

Habitats Regulations Assessment of the Medway Local Plan

Interim Habitats Regulations Assessment Report

June 2025



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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Acronyms & abbreviations

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
ALS	Abstraction License Strategy
CAMS	Catchment Abstraction Management Strategy
CEcIA	Cumulative Ecological Impact Assessment
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
dB	Decibel
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley and Associates
EMS	European Marine Site
EP	Environmental Permit
FLL	Functionally Linked Land
GI	Green Infrastructure
HDV	Heavy Duty Vehicle
HRA	Habitats Regulations Assessment
IAQM	Institute of Air Quality Management
IDP	Infrastructure Delivery Plan
IROPI	Imperative Reasons of Overriding Public Interest
IRZ	Impact Risk Zone
IUCN	International Union for Conservation of Nature
JNCC	Joint Nature Conservation Committee
LNR	Local Nature Reserve
LPA	Local Planning Authority
LSE	Likely Significant Effect
LWS	Local Wildlife Site
MEASS	Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy
MLP	Medway Local Plan
NO_x	Nitrogen Oxides
PCSO	Police Community Support Officer
PRoW	Public Rights of Way
RMBP	River Management Basin Plan
SAC	Special Area of Conservation
SAMMS	Strategic Access Management and Monitoring Strategy
SIP	Site Improvement Plan
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Urban Drainage Systems
SWMC	Surface Water Management Catchment
TIDE	Tidal River Development
WFA	Whole Feature Assessment
WFD	Water Framework Directive
WRMP	Water Resource Management Plan
WRZ	Water Resource Zone
WwTWs	Wastewater Treatment Works
ZoI	Zone of Influence

Executive Summary

Introduction

- E1. Lepus Consulting has been appointed, on behalf of Medway Council to undertake a Habitats Regulations Assessment (HRA) of the proposed submission draft of the Medway Local Plan (MLP). The report has been prepared in compliance with the Habitats Regulations 2017 (as amended)¹.
- E2. This is an interim HRA report since some information which is necessary for the completion of the assessment is, at the time of writing, outstanding.

Screening Outcomes (HRA Stage 1)

- E3. The MLP is not directly connected with or necessary to the management of any European site. Consideration was therefore given to potential links or causal connections between the effects of the MLP and European sites within the study area to identify likely significant effects (LSEs). This exercise was undertaken through the collation of information for each European site and application of a 'source-pathway-receptor' model.
- E4. Taking no account of mitigation measures, the screening stage concluded that the MLP has the potential to have LSEs at the following European sites:
- **Medway Estuary and Marshes SPA** – air quality, hydrology, recreational pressure and urbanisation impacts
 - **Medway Estuary and Marshes Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
 - **Thames Estuary and Marshes SPA** – air quality, hydrology, recreational pressure and urbanisation impacts.
 - **Thames Estuary and Marshes Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
 - **The Swale SPA** – air quality, hydrology, recreational pressure and urbanisation impacts.
 - **The Swale Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
 - **North Downs Woodlands SAC** – air quality, hydrology and recreational pressure.
- E5. The identification of LSEs at the screening stage triggered the requirement for an Appropriate Assessment (AA), stage 2 of the HRA process.

¹ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Accessed: 14/12/22] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Accessed: 13/06/25].

Appropriate Assessment Outcomes (HRA Stage 2)

Air Quality Appropriate Assessment

- E6. At the time of writing, air quality modelling information which is necessary to evaluate air quality impacts associated with the MLP at the North Kent Estuary European sites² and the North Downs Woodlands SAC remains outstanding. It is therefore not possible to conclude whether the MLP will have an adverse impact upon the integrity of European sites in respect of air quality impacts. Further work in the form of air quality modelling is currently being scoped by the Council, in consultation with Natural England, and will inform a full AA of air quality impacts in due course. Once air quality modelling has been evaluated, this interim HRA report will be finalised and a conclusion of adverse impacts reached in terms of air quality impacts.

Water Quality and Water Quantity Appropriate Assessment

- E7. The potential effects of a change in water quantity due to development allocations associated with the MLP on the North Kent Marshes European sites and the North Downs Woodlands SAC were evaluated as part of the AA. Potential effects due to a change in water quality were also evaluated for the North Kent Marshes European sites. This assessment took into account the high-level regulatory water quantity and quality protective frameworks which address growth from the MLP and in-combination growth in neighbouring areas. This high-level framework includes the Water Resource Management Plan, River Basin Management Plan, Drainage and Wastewater Management Plan and Drought Plan. The assessment also took into consideration MLP requirements for new development set out in policy wording. This information was analysed in the context of the conservation objectives for each European site. It was concluded that no adverse impacts on the site integrity at any European site due to a change in water quantity or quality will arise as a result of the MLP either alone or in-combination.

Recreation Pressure Appropriate Assessment

- E8. The potential impact of increased recreational pressures upon the North Kent Marshes European sites and North Downs Woodlands SAC was assessed, drawing on a detailed evidence base and geographical information for proposed site allocations. The assessment took into consideration mitigation measures including the 'Bird Wise North Kent Strategic Access Management and Monitoring Strategy' (SAMMS), the emerging 'Hoo Peninsula Strategic Environmental Programme' for the North Kent Marshes and the 'Securing the Landscape Project' for the North Downs Woodlands SAC. These mitigation measures are secured through MLP policy wording. Whilst it is considered that this mitigation is likely to ensure no adverse impact upon the site integrity of any European site from recreational impacts, as the details of the Hoo Peninsula Strategic Environmental Programme are yet to be finalised, and taking a precautionary approach, no conclusion is drawn in this HRA report. Once the Hoo Peninsula Strategic Environmental Programme has been finalised, in consultation with Natural England, this interim HRA report will be finalised and a conclusion of adverse impacts reached in terms of recreational impacts.

² These sites comprise the Medway Estuary and Marshes SPA, the Medway Estuary and Marshes Ramsar, the Thames Estuary and Marshes SPA, the Thames Estuary and Marshes Ramsar, the Swale SPA and the Swale Ramsar.

Urbanisation Appropriate Assessment

- E9. Given the proximity of some proposed allocations to the North Kent Marshes European sites, urbanisation effects upon both designated sites and areas of functionally linked land were assessed. The outputs of the AA informed policy wording which requires development within an Impact Risk Zone (IRZ) associated with a Site of Special Scientific Interest (SSSI) where it underpins the North Kent Marshes European sites to implement a range of mitigation measures to address noise, lighting, dust and visual impacts. Taking these factors into consideration, it was concluded that no adverse impacts on the site integrity at any European site due to an increase in recreational pressure as a result of the MLP either alone or in-combination.

Conclusions

- E10. This interim HRA report has concluded no adverse impacts on the site integrity of any European site due to a change in water quality, water quantity or urbanisation effects as a result of the MLP either alone or in-combination.
- E11. This HRA report has however not been able to reach a conclusion regarding potential adverse air quality impacts upon the site integrity of the North Kent Marshes European sites or the North Downs Woodlands SAC, or recreational impacts upon the North Kent Marshes European sites. Further air quality modelling work, to be commissioned by the Council, and the final Hoo Peninsula Strategic Environmental Programme, will be evaluated to further inform the appropriate assessment. Once the results of the air quality modelling and the Hoo Peninsula Strategic Environmental Programme and have been evaluated, this HRA report can be updated and finalised.
- E12. The final HRA report will be submitted to Natural England, the statutory nature conservation body, for formal consultation once available. The Council must 'have regard' to Natural England's representations under the provisions of the Habitats Regulations prior to making a final decision as to whether they will 'adopt' the conclusions set out within this report as their own.

1 Introduction

1.1 A new local plan for Medway

1.1.1 Medway Council is preparing a new local plan to set the framework for the area's growth up to 2041. The Medway Local Plan (MLP) will provide a framework for where and how new development can take place from 2026/27–2040/41. Once adopted, the MLP will replace the 2003 Medway Local Plan³.

1.1.2 The MLP will cover the urban conurbation which extends across the five historic towns of Medway (Strood, Rochester, Chatham, Gillingham and Rainham) and the surrounding network of villages on the Hoo Peninsula and within the Medway Valley. This area is referred to hereafter as the 'Plan area' and is illustrated in **Figure 1.1**.

1.2 Purpose of this report

1.2.1 Lepus Consulting has prepared this report to inform the Habitats Regulations Assessment (HRA) of the proposed submission draft of the MLP⁴ on behalf of Medway Council. The MLP is also known as the Regulation 19 version of the plan because Regulation 19 of the Local Plan Regulations 2012⁵ requires that local plans are subject to particular stages of consultation.

1.3 Habitats Regulations Assessment

1.3.1 The application of HRA to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)⁶. HRA applies to plans and projects, including all local development documents in England and Wales.

1.3.2 Where a plan is likely to have a significant effect on a European site (either alone or in combination) and is not directly connected with or necessary to the management of the European site, Regulation 105 of the Habitats Regulations notes that the plan making authority for that plan must, before the plan is given effect, make an Appropriate Assessment (AA) of the implications for the site in view of that site's conservation objectives. These tests are referred to collectively as a Habitats Regulations Assessment (HRA).

³ Medway Council (2003) Medway Local Plan. Available at:
https://www.medway.gov.uk/downloads/file/2400/medway_local_plan_2003 [Date accessed:14/05/25].

⁴ Medway Council (12 June 2025) Medway Local Plan Proposed Submission Draft, Regulation 19. Version 2.

⁵ The Town and Country (Local Planning) (England) Regulations 2012 Statutory Instrument 767

⁶ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

- 1.3.3 The Habitats Regulations⁷ provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive. In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site⁸:
- A potential SPA (pSPA)
 - A possible / proposed SAC (pSAC)
 - Listed and proposed Ramsar Sites (wetland of international importance)
 - In England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPA, pSAC, and listed or proposed Ramsar sites.
- 1.3.4 The Council, as the competent authority, has responsibility to make the Integrity Test. The Integrity Test asks whether a plan or project has the potential to adversely affect the integrity of a European site alone or in-combination. The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated⁹. This can be undertaken in light of the conclusions set out in this report, having regard to representations made by Natural England under the provisions of the Habitats Regulations.
- 1.3.5 This HRA report has been prepared using the following guidance:
- Planning Practice Guidance: Appropriate Assessment¹⁰
 - The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: 'Practical Guidance for the Assessment of Plans under the Regulations')¹¹.

⁷ Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

⁸ Ministry of Housing, Communities and Local Government (2025). National Planning Policy Framework. Para 194.

⁹ Ministry of Housing, Communities and Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

¹⁰ Ministry of Housing, Communities and Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

¹¹ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (June) (2024) edition UK: DTA Publications Limited.

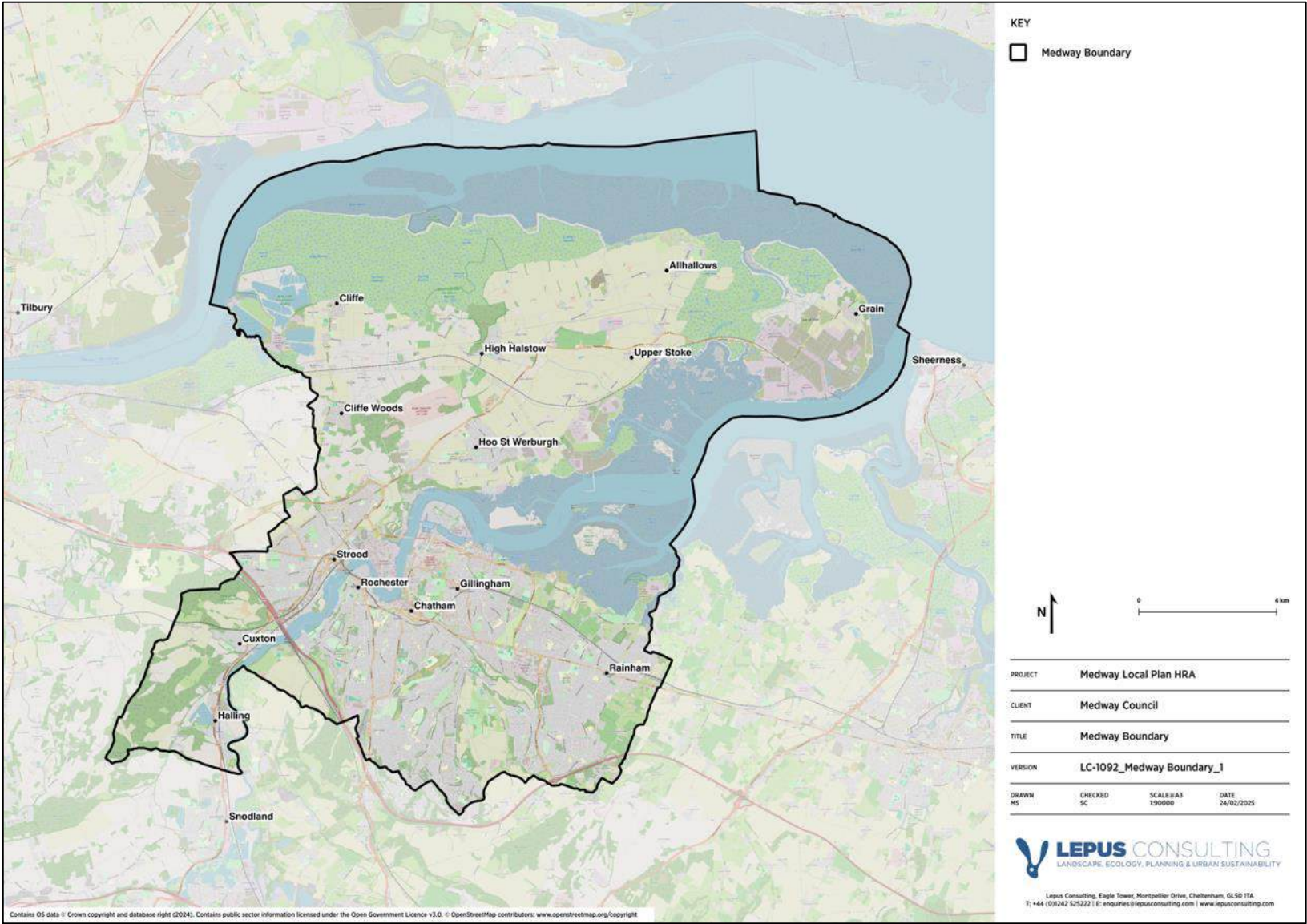


Figure 1.1: Medway Boundary

1.4 Previous HRA work

1.4.1 An initial consultation document ‘setting the direction for Medway’ was prepared by Medway Council and published for consultation between 18th September and 31st October 2023¹². The consultation was supported by a preliminary HRA which identified impact pathways to European sites and provided a preliminary high-level screening of the issues considered and recommendations to inform future policies¹³. Natural England was consulted on the preliminary HRA and welcomed the consideration of issues set out in the HRA report¹⁴.

1.4.2 Following the 2023 consultation, a Regulation 18 consultation was carried out between 15th July and 8th September 2024¹⁵. The Regulation 18 consultation built on the responses to the previous consultation ‘setting the direction for Medway’ and reviewed details on proposed policies and spatial growth options including an urban focus, dispersed growth and a blended regeneration strategy. The consultation was supported by an HRA¹⁶ which provided a screening of the indicative preferred strategy in the context of pathways to European sites and screened in likely significant effects at the following European sites:

- **Medway Estuary and Marshes SPA** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **Medway Estuary and Marshes Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **Thames Estuary and Marshes SPA** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **Thames Estuary and Marshes Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **The Swale SPA** – air quality and hydrology.
- **The Swale Ramsar** – air quality and hydrology.
- **North Downs Woodlands SAC** – air quality, hydrology and recreational pressure.

1.4.3 Natural England was consulted on this Regulation 18 HRA and provided a number of comments in relation to the HRA report as follows¹⁷:

- Consideration should be given to all features for which European sites are designated – with a particular focus on Ramsar sites (e.g. invertebrates and wetland plants).

¹² Medway Council (2023) Setting the direction for Medway 2040. Available at: www.medway.gov.uk/info/200542/medway_local_plan_2040/1823/setting_the_direction_for_medway_2040 [Date accessed: 14/05/25].

¹³ Lepus Consulting (September 2023) Regulation 18: Setting the Direction for Medway 2040. Preliminary HRA Report.

¹⁴ Natural England (2023) Medway Local Plan Regulation 18 Consultation. 31 October 2023. [Letter].

¹⁵ Medway Council (2024) Regulation 18 Consultation. Available at: https://www.medway.gov.uk/info/200542/medway_local_plan_2041/1823/medway_local_plan_regulation_18_consultation_2024 [Date accessed: 14/05/25].

¹⁶ Lepus Consulting (June 2024) Habitats Regulations Assessment of the Medway Local Plan Regulation 18.

¹⁷ Natural England (2023) Medway Local Plan Regulation 18 Consultation. 31 October 2023. [Letter].

- In terms of air quality, both transport and wider development related air quality emissions should be considered in the HRA process (e.g. those related to industrial development allocations).
- In terms of water quality and water quantity, Natural England recommended that further clarity be provided on the source of water to Peter's Pit SAC.
- Natural England recommended that recreational impacts upon the Swale SPA and Ramsar site should be taken into consideration.
- Natural England recommended that a broad suite of urbanisation effects should be taken into considered alongside recreational effects upon both European sites and areas of functionally linked land.
- The requirement for additional coastal defences and the impact of this upon coastal squeeze should be taken into consideration.

1.4.4 Natural England's comments were discussed in a meeting on 6th January 2025 and have been taken into consideration within this proposed submission HRA.

2 Methodology

2.1 Overview

2.1.1 HRA is a rigorous precautionary process centred around the conservation objectives of a European site's qualifying interests. It is intended to ensure that European sites are protected from impacts that could adversely affect their integrity. A step-by-step guide to the HRA methodology, as outlined in the DTA Handbook, is illustrated in **Figure 2.1**. This HRA report provides outputs from Stage 1 and Stage 2 of the HRA process.

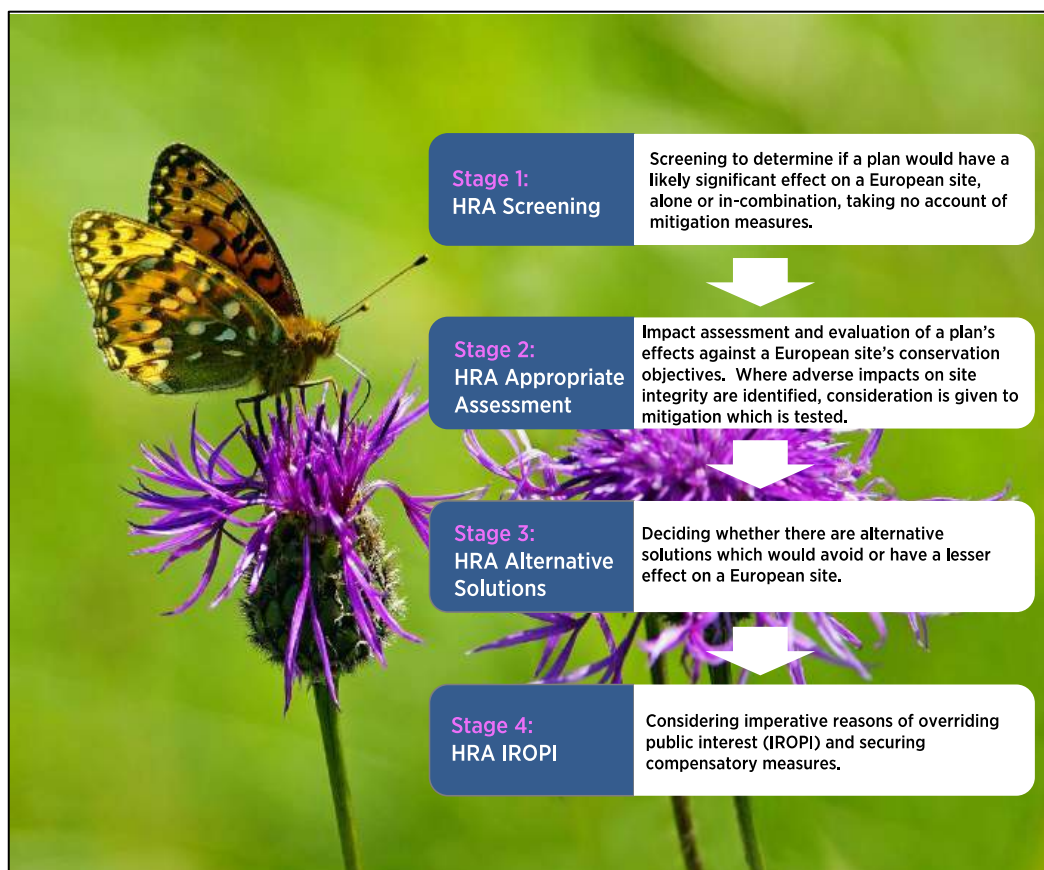


Figure 2.1: Stages in the Habitats Regulations Assessment process¹⁸

2.2 Stage 1: Screening for Likely Significant Effects

2.2.1 The first stage in the HRA process comprises the screening stage (see **Figure 2.1**). The purpose of the screening process is to firstly determine whether a plan is either (1) exempt (because it is directly connected with or necessary to the management of a European site), (2) whether it can be excluded (because it is not a plan), or (3) eliminated (because there would be no conceivable effects), from the HRA process. If none of these conditions apply, it is next necessary to identify whether there are any aspects of the plan which may lead to a Likely Significant Effect (LSE) at a European site, either alone or in-combination with other plans or projects.

¹⁸ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (January) (2021) edition UK: DTA Publications Limited.

- 2.2.2 Screening was undertaken of the Regulation 18 MLP which concluded that it had the potential to have LSEs on a number of European sites alone and in-combination. It therefore concluded that the MLP would be screened into the HRA process, and an AA would be required (Stage 2 - **Figure 2.1**).
- 2.2.3 Where elements of the MLP have been updated in response to the Regulation 18 consultation and the updated supporting evidence base, these components have been re-screened to determine whether the Publication MLP is likely to have an LSE alone or in-combination. The codes set out in **Table 2.1** are used to inform the formal screening decision (Column 2). The results of this re-screening exercise are presented in **Chapter 4** of this report.

Table 2.1: Screening evaluation and reasoning categories from Part F of the DTA Handbook¹⁹

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013):	Screen in / Screen out
A. General statements of policy / general aspirations	Screen Out
B. Policies listing general criteria for testing the acceptability / sustainability of proposals.	Screen Out
C. Proposal referred to but not proposed by the Plan.	Screen Out
D. General plan-wide environmental protection / designated site safeguarding / threshold policies.	Screen Out
E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.	Screen Out
F. Policies or proposals that cannot lead to development or other change.	Screen Out
G. Policies or proposals that could not have any conceivable or adverse effect on a site.	Screen Out
H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects).	Screen Out
I. Policies or proposals with a Likely Significant Effect on a site alone.	Screen In
J. Policies or proposals unlikely to have a significant effect alone.	Screen Out
K. Policies or proposals unlikely to have a significant effect either alone or in-combination.	Screen Out
L. Policies or proposals which might be likely to have a significant effect in-combination.	Screen In
M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.	Screen In

¹⁹ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (December) (2019) edition UK: DTA Publications Limited. Available at: <http://www.dtapublications.co.uk/> [Date accessed: 10/01/25]

2.2.4 The judgement by the European Court of Justice on the interpretation of the Habitats Directive in the case of *People Over Wind and Sweetman vs Coillte Teoranta* (Case C-323/17²⁰) determined that mitigation measures are only permitted to be considered as part of the AA stage of the HRA process. The HRA screening process has therefore taken no account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a European site when assessing the LSEs of the MLP on European sites. These are measures which, if removed (i.e. should they no longer be required for the benefit of a European site), would still allow the lawful and practical implementation of a plan.

2.3 In-combination effects

2.3.1 Should screening conclude there are no LSEs from the MLP alone, it is necessary to then consider whether the effects of the MLP in-combination with other plans and projects would combine to result in an LSE on any European site. It may be that the MLP alone will not have an LSE but could have a residual effect which may contribute to in-combination LSEs on a European site.

2.3.2 Plans and projects which are considered to be of most relevance to the in-combination assessment of the MLP include those that have similar impact pathways (see **Appendix A**). These include those plans and projects which have the potential to increase development in the HRA study area including the following Local Planning Authority (LPA) local development plans:

- Castle Point Borough Council
- Dartford Borough Council
- Gravesham Borough Council
- Maidstone Borough Council
- Southend-on-Sea Borough Council
- Swale Borough Council
- Thurrock Council
- Tonbridge and Malling Borough Council

2.3.3 In addition, other plans and projects with the potential to increase traffic across the study area have the potential to act in-combination with the MLP include the Kent Minerals and Waste Plan²¹, Medway Local Transport Plan²², Kent Local Transport Plan²³ and relevant river basin and water resource management plans. Consideration has also been given to in-combination effects with the Lower Thames Crossing in terms of its effect on traffic movements.

²⁰ InfoCuria (2018) Case C-323/17. Available at: <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date accessed: 10/01/24].

²¹ Kent County Council (2020) Kent Minerals and Waste Local Plan 2013-30. Available at: https://www.kent.gov.uk/_data/assets/pdf_file/0004/112585/Kent-Minerals-and-Waste-Local-Plan-2013-2030.pdf [Date Accessed: 26/02/25].

²² Medway Council (2011) Medway Local Transport Plan 2011-2026 Moving forward together.

²³ Kent County Council (2024) Local Transport Plan 5: Striking the Balance. Available at: <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/roads-paths-and-transport-policies/striking-the-balance-our-local-transport-plan> [Date Accessed: 23/06/25].

2.4 Stage 2: Appropriate Assessment and Integrity Test

- 2.4.1 Stage 2 of the HRA process comprises the AA and Integrity Test. The purpose of the AA is to undertake an assessment of the implications of a plan for a European site in light of its conservation objectives²⁴.
- 2.4.2 As part of this process, plan makers should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation and they should consult interested parties on the possible ways of managing the risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on European sites. Mitigation measures may take the form of policies within the MLP, or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate the adverse effects for which they are targeted.
- 2.4.3 The AA aims to present information in respect of all aspects of the MLP and ways in which it could, either alone or in-combination with other plans and projects, impact a European site. The plan making body (as the Competent Authority) must then ascertain, based on the findings of the AA, whether the Publication plan will adversely affect the integrity of a European site either alone or in-combination with other plans and projects. This is referred to as the Integrity Test.

2.5 Dealing with uncertainty

- 2.5.1 Uncertainty is an inherent characteristic of HRA, and decisions can be made using currently available and relevant information. This concept is reinforced on the 7th of September 2004 'Waddenzee' ruling²⁵:
- 2.5.2 *"However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead, it is clear from the second sentence of Article 6(3) of the Habitats Directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the AA. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty".*

2.6 The Precautionary Principle

- 2.6.1 The HRA process is characterised by the Precautionary Principle. This is described by the European Commission: *"If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered"*. The Precautionary Principle is embedded in the Integrity Test.

²⁴ Ministry of Housing, Communities and Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

²⁵ EC Case C-127/02 Reference for a Preliminary Ruling 'Waddenzee' 7th September 2004 Advocate General's Opinion (para 107).

3 Scoping of Threats and Pressures at European sites

3.1 Introduction

- 3.1.1 An important initial stage of the screening process is gathering information on European sites which may be affected by the MLP. This is known informally as scoping and provides an understanding of potential impact pathways from the MLP and connections to European sites and their vulnerabilities. This information is then used to inform the screening assessment (**Chapter 4**). This chapter presents an update of the Regulation 18 baseline information for each European site and their associated threats and pressures in the context of potential impacts from the proposed submission draft MLP at Regulation 19.

3.2 Identification of a HRA study area

- 3.2.1 Each European site has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enables the site to support its particular ecosystems. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment (known as pressures and threats). For example, sites can be affected by land use plans in a number of different ways, including the direct land take of new development, the type of use the land will be put to (for example, an extractive or noise-emitting use), or the pollution / threat a development generates (air pollution, water pollution or increased recreational pressure), and the resources used (for example water abstraction).
- 3.2.2 An intrinsic quality of any European site is its functionality at the landscape ecology scale. This refers to how the site interacts with its immediate surroundings as well as the wider area. This is particularly the case where there is potential for development resulting from a plan to generate water or air-borne pollutants, use water resources or otherwise affect water levels. Adverse effects may also occur via impacts to mobile species occurring outside a designated site boundary, but which are qualifying features of the site. For example, there may be effects on protected birds, bats and fish which use land outside a designated site for foraging, feeding, roosting, breeding or other activities.
- 3.2.3 There is no guidance that defines the study area for inclusion in an HRA. Planning Practice Guidance for Appropriate Assessment²⁶ indicates that: *“The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. ‘Appropriate’ is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site”*.
- 3.2.4 The purpose of scoping is to determine the HRA study area and therefore which European sites will be considered in the HRA process.

²⁶ Ministry of Housing, Communities and Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

3.3 Scoping impact pathways

- 3.3.1 Threats and pressures to which European sites are vulnerable have been identified through reference to data held by the JNCC and Natural England and through reference to Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each European site and is summarised in **Appendix B**.
- 3.3.2 Supplementary advice notices prepared by Natural England often provide more recent information on threats and pressures upon European sites than SIPs and have therefore also been reviewed. A number of threats and pressures are unlikely to be exacerbated by the MLP and have therefore not been considered.
- 3.3.3 Sites of Special Scientific Interest (SSSIs) are protected areas in the United Kingdom designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. It is considered that the conservation status of SSSI features that overlap with European sites offer a useful indicator of habitat / species health at a particular location.
- 3.3.4 Natural England conducts Whole Feature Assessments (WFA) which measure the condition of each notified feature across the whole of the SSSI. The conservation status of each notified feature highlights any areas which are particularly vulnerable to threats/pressures. Conservation status is defined as below.
- Favourable
 - Unfavourable – recovering
 - Unfavourable – no change
 - Unfavourable – declining
- 3.3.5 SSSI features in either an ‘Unfavourable – no change’ or ‘Unfavourable – declining’ condition indicate that the European site may be particularly vulnerable to certain threats or pressures. It is important to remember that SSSI features may be in an unfavourable state due to the condition of features unrelated to a European designation.
- 3.3.6 Natural England defines zones around each SSSI which may be at risk from specific types of development, these are known as Impact Risk Zones (IRZ). These IRZs are “a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and ‘Compensation Sites’, which have been secured as compensation for impacts on Natura 2000/Ramsar sites”²⁷. The location of IRZs has been taken into consideration in this assessment as they provide a useful guide as to the location of functionally linked land (defined in **paragraph 3.3.8**) and likely vulnerabilities to development proposed within the MLP.

²⁷ Natural England (2019) Natural England's Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf [Date Accessed: 17/01/25].

3.3.7 Based on the previous HRA work undertaken at Regulation 18, the following potential impact pathways are considered to be within the scope of influence of the MLP:

- **Air pollution:** Land use planning has the potential to increase atmospheric emissions of pollutants to the air. These can result in adverse effects at European sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)²⁸.
- **Water resources and water levels:** Urban development can change run off rates from urbanised areas to European sites or watercourses which run through them. An increase in housing provision can also influence supply and demand for water within the region which may impact water levels.
- **Water quality:** Surface water run-off from urban areas has the potential to reduce the quality of water entering a catchment. Water quality may also be reduced through point source effluent discharges from new development at Wastewater Treatment Works (WwTWs) and other controlled discharge sources. Changes in water quality also have the potential to affect functionally linked land (FLL) (land or watercourses outside a designated site boundary).
- **Recreational pressure:** New housing development has the potential to increase recreational pressure upon European sites which are accessible to the public.
- **Urbanisation effects:** Urban development has the potential to result in disturbing activities (such as noise, vibration, lighting, cat predation and visual disturbance). Disturbance effects may impact upon European sites themselves and also their qualifying features when outside a designated site boundary. It may also result in the fragmentation of connecting habitats and corridors which could hinder the movement of mobile qualifying species when located outside a designated site boundary.
- **Coastal squeeze:** Coastal squeeze is a process by which coastal defences prevent intertidal habitats from migrating landwards and are therefore subsumed by rising sea levels. Given the location of the Plan area and the coastal nature of adjacent European sites, increased development has the potential to result in a loss of European sites when considered alongside sea level rise.

3.3.8 Land use planning also has the potential to result in impacts upon qualifying features of a European site when located outside a designation boundary, known as Functionally Linked Land (FLL). According to Natural England, *“the term ‘functional linkage’ refers to the role or ‘function’ that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore ‘linked’ to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status”*²⁹. This HRA therefore also considers effects upon FLL or mobile species when outside a designated site boundary within the above topic assessments.

²⁸ APIS (2016) Ecosystem Services and air pollution impacts.

²⁹ Natural England (2016) Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

3.4 Scoping European sites

3.4.1 Based on a review of HRA work undertaken to date and local knowledge, the following European sites are considered to be within the scope of influence of the MLP:

- Medway Estuary and Marshes SPA
- Medway Estuary and Marshes Ramsar
- North Downs Woodlands SAC
- Peter's Pit SAC
- Queendown Warren SAC
- Thames Estuary and Marshes SPA
- Thames Estuary and Marshes Ramsar
- The Swale SPA
- The Swale Ramsar

North Kent Marshes

3.4.2 The area of wetland, marsh and intertidal habitat which run along the North Kent coast, encompassing the Thames, Medway and Swale estuaries include the following designated sites:

- Medway Estuary and Marshes SPA
- Medway Estuary and Marshes Ramsar
- Thames Estuary and Marshes SPA
- Thames Estuary and Marshes Ramsar
- The Swale SPA
- The Swale Ramsar

3.4.3 These designations form a contiguous swathe of coastal habitat, known as the North Kent Marshes throughout this report. They are designated due to their importance for wintering waterfowl, breeding waterfowl, breeding and wintering raptors and a range of rare plants and invertebrate species³⁰. The bird, plant and invertebrate species for which these sites are designated are provided in **Appendix B**.

3.4.4 The Thames Estuary SPA and Thames Estuary Ramsar is the furthest west of these designated sites and extends predominantly along the south side of the River Thames, with a small area along its northern shore. According to research undertaken by Natural England (2011)³¹, the area to the south of the river comprises brackish grazing marsh, some of which has been converted to arable use, with flooded clay pits at Cliffe which have been filled with dredgings. In addition, there is a small extent of salt marsh and broad intertidal mud-flats outside the sea wall.

³⁰ LILEY, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

³¹ LILEY, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

- 3.4.5 From west to east the next designated site along the coast comprises the Medway Estuary and Marshes SPA and Medway Estuary and Marshes Ramsar. This area is located on both the northern and southern banks of the Medway Estuary and forms a single tidal system with the Swale. It joins the Thames Estuary between the Isle of Grain and Sheerness. It consists of a complex arrangement of tidal channels, which drain around large islands of saltmarsh and peninsulas of grazing marsh. The mud-flats are rich in invertebrates and also support beds of *Enteromorpha* and some Eelgrass *Zostera spp.* Small shell beaches occur, particularly in the outer part of the estuary. Grazing marshes are present inside the sea walls around the estuary. The complex and diverse mixes of coastal habitats support important numbers of waterbirds throughout the year. In summer, the estuary supports breeding waders and terns, whilst in winter it holds important numbers of geese, ducks, grebes and waders. The site is also of importance during spring and autumn migration periods, especially for waders³².
- 3.4.6 The Swale SPA and the Swale Ramsar lies furthest to the east between the Isle of Sheppey and the Kent Mainland, joining the Medway Estuary to the west. Research undertaken by Liley (2011)³³ notes that it comprises a complex of brackish and freshwater floodplain grazing marshes with ditches and intertidal salt marshes and mud-flats. The intertidal habitat supports a dense invertebrate fauna and bed of algae and eelgrass, with large mussel beds locally on harder areas of substrate.
- 3.4.7 Any part of a European site which is covered (continuously or intermittently) by tidal waters or any part of the sea in or adjacent to Great Britain up to the seaward limit of territorial waters are called European Marine Sites (EMS). Two EMS are located within and adjacent to the Plan area including the Swale and Medway EMS and the Thames Estuary and Marshes EMS.

North Downs Woodlands SAC

- 3.4.8 The North Downs Woodlands SAC consists of mature Beech (*Fagus sylvatica*) forests and Yew (*Taxus baccata*) woods on steep slopes. These woodland stands lie within a mosaic of scrub, other woodland types and areas of unimproved grassland on thin chalk soils³⁴.

Peter's Pit SAC

- 3.4.9 Peter's Pit SAC comprises an old chalk quarry situated in the North Downs with adjoining soil-stripped fields, with scattered ponds situated amongst grassland, scrub and woodland. These ponds have widely fluctuating water levels and support large breeding populations of Great Crested Newt (*Triturus cristatus*)³⁵.

³² JNCC Medway Estuary and Marshes SPA Site Description. Available at: <http://jncc.defra.gov.uk/default.aspx?page=2043>. [Date Accessed: 23/04/25].

³³ LILEY, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

³⁴ Natural England (2019) North Downs Woodlands SAC. Supplementary Advice.

³⁵ Natural England (2015) Peter's Pit SAC. Supplementary Advice.

Queendown Warren SAC

- 3.4.10 Queendown Warren SAC is located in the North Downs and comprises an area of semi-natural dry grassland on the south-facing slope of a dry chalk valley³⁶. In addition to the grassland flora, it also supports an important assemblage of rare and scarce orchids and is entomologically diverse.

3.5 Air pollution

- 3.5.1 Air pollution can affect designated sites if it has an adverse effect on the features of qualifying interest. The main mechanisms through which air pollution can have an adverse effect is through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides). Deposition of air pollutants can alter the soil and plant composition and species which depend upon these.

- 3.5.2 Natural England has developed a standard methodology for the assessment of traffic related air quality impacts under the Habitats Regulations which is relevant to the HRA of land use plans³⁷. This guidance sets a methodology and thresholds for screening of likely significant air quality effects at the HRA screening stage (Stage 1 of the HRA process).

- 3.5.3 Natural England's guidance (in the form of a series of questions / thresholds below) has been applied to determine potential air quality impact pathways to European sites:

- Does the MLP give rise to emissions which are likely to reach a European site?
- Are the qualifying features of sites within 200m of a road sensitive to air pollution?
- Could the sensitive qualifying features of the site be exposed to emissions?
- Application of screening thresholds (alone and then, if necessary, in-combination).

Does the MLP give rise to emissions which are likely to reach a European site?

- 3.5.4 The MLP will trigger housing and employment development and as such increase traffic related emissions. Air quality impacts have been shown to typically affect European sites within 10km of a plan boundary³⁸. Campman and Kite (2021) note that *'this zone is based on professional judgment recognising that the effects of growth from development beyond 10km will have been accounted for in the Nitrogen Futures modelling work business as usual scenario'*³⁹. This 10km distance threshold can be a useful guide to identify the broad areas that may be impacted by air quality. However, it is acknowledged that consideration should also be given to larger residential or commercial allocations and their wider potential for air quality impacts in the context of the local and regional road network.

³⁶ Natural England (2019) Queendown Warren SAC. Supplementary Advice.

³⁷ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001).

³⁸ Chapman, C and Kite, B. (2021) Main Report. Guidance on Decision-making Thresholds for Air Pollution. JNCC Report No. 696.

³⁹ JNCC. (2022) Nitrogen Future.

3.5.5 Data obtained from the Office for National Statistics highlights the most common destinations for journeys to work undertaken by car or van arising from and finishing in the plan area⁴⁰. The key traffic destinations / origins include neighbouring authority areas such as Maidstone, Tonbridge and Malling, Swale, Gravesham and Dartford. The European sites located within 10km of the Plan boundary and within these key commuting areas include:

- Medway Estuary and Marshes Ramsar
- Medway Estuary and Marshes SPA
- North Downs Woodlands SAC
- Peter's Pit SAC
- Queendown Warren SAC
- Thames Estuary and Marshes Ramsar
- Thames Estuary and Marshes SPA
- The Swale Ramsar
- The Swale SPA

Are the qualifying features of sites within 200m of a road sensitive to air pollution?

3.5.6 It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance^{41,42,43}. Baseline mapping data has been used to determine the proximity of European sites, and their qualifying features, to roads (within 200m) which may result in an exceedance of Natural England's screening thresholds (A and B roads) within a 10km buffer from the Plan area and within the key commuting area⁴⁴.

3.5.7 The UK Air Pollution Information System (APIS) provides information on all European sites and the sensitivity of their qualifying features (habitats and / or species) to air pollution. This data has been analysed, alongside a desk-based review of site-based data, to determine whether there may be impact pathways from the MLP to any European site through a change in atmospheric emissions (**Table 3.1**). Based on a review of aerial mapping data and priority habitat information it is concluded that qualifying features of the sites listed in **paragraph 3.5.5** are likely to be located within 200m of a Motorway, A or B road. This information suggests that these locations are sensitive to changes in air quality in particular from atmospheric nitrogen deposition (all qualifying features). The desk-based review indicated that no road links are located within 200m of Queendown Warren SAC.

⁴⁰ Office for National Statistics (2011) Location of usual residence and place of work by method of travel to work (2011 census data). Travel by car or van only. Available at: <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462281> [Date Accessed: 17/01/25].

⁴¹ The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality.

⁴² Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

⁴³ Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁴⁴ As per Nitrogen Futures Modelling Work – see Paragraph 5.4.8.

Could the sensitive qualifying features of the site be exposed to emissions?

- 3.5.8 As noted above, the MLP will trigger housing and employment development and as such has the potential to increase traffic related emissions within 10km of the Plan area and therefore along road links within 200m of European sites, which are listed in **Table 3.1**. A review of Natural England SIP data (**Appendix B**) indicates that Peter's Pit SAC is not a site that is sensitive to changes in air quality.

Application of screening thresholds (alone and then, if necessary, in-combination)

- 3.5.9 Natural England's advice on the assessment of air quality impacts under the Habitats Regulations states that consideration should be given to the risk of road traffic emissions associated with a local plan⁴⁵. This advice states that an assessment of the risks from road traffic emissions can be expressed in terms of the average annual daily traffic flow (AADT as a proxy for emissions). The use of the AADT screening threshold is advocated by Highways England in their Design Manual for Roads and Bridges (DMRB). This screening threshold is intended to be used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic is required. This non-statutory or guideline threshold is based on a predicted change of daily traffic flows of 1,000 AADT or more (or heavy-duty vehicle flows on motorways (HDV) change by 200 AADT or more).
- 3.5.10 The AADT thresholds do not themselves imply any intrinsic environmental effects and are used solely as a trigger for further investigation. Widely accepted environmental benchmarks for imperceptible impacts are set at 1% of the critical load or level, which is considered to be roughly equivalent to DMRB thresholds for changes in traffic flow of 1,000 AADT and for HDV of 200 AADT. This has been confirmed by modelling using the DMRB Screening Tool that used average traffic flow and speed figures from the Department for Transport (DfT) data to calculate whether the NO_x outputs could result in a change of >1% of critical load / level on different road types. A change of >1,000 AADT on a road was found to equate to a change in traffic flow which might increase emissions by 1% of the Critical Load or Level and might consequentially result in an environmental effect nearby (e.g. within 10 metres of roadside).
- 3.5.11 The AADT thresholds and 1% of critical load/level are considered by Natural England to be suitably precautionary as any emissions below this level are widely considered to be imperceptible and, in the case of AADT, undetectable through the DMRB model. There can, therefore, be a high degree of confidence in its application to screen for risks of an effect.
- 3.5.12 Traffic data used to inform the screening assessment was derived from the Medway Transport Model (MTM), built using PTV VISUM software version (2022) and modelled within the Medway Area of Detailed Modelling Boundary (AODM). Traffic flows outside the AODM have not necessarily met TAG base year development criteria. The MTM has been developed using a cordon of the existing Kent Transport Model and therefore has a consistent base year of 2019. Traffic data was provided as AADT movement for the following three scenarios which allowed consideration of both alone and in-combination effects:

⁴⁵ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001).

- 2019 Base year.
- 2041 Reference Case (Do Nothing): This includes completions and commitments within the borough since 2019, significant recent completions and commitments outside of the borough, and natural traffic growth.
- 2041 Do Something: This is a copy of the 2041 Reference Case scenario, plus MLP development sites and their associated highway mitigation schemes.

3.5.13 Further details can be found in the Strategic Transport Model Assessment.

3.5.14 The results for the Do-Minimum (Reference Case) and Do-Something scenarios were compared against one-another to show the impacts of the MLP in-isolation (alone). The in-combination assessment was completed by comparing the results of the Base and the Do-Something scenarios. The traffic modelling takes into consideration commitments outside the borough alongside natural traffic growth. This allows the impact of the Local Plan in-combination with all neighbouring LPA and wider growth to be taken into consideration accurately. It also takes into consideration the impact of the Lower Thames Crossing.

3.5.15 The total change in AADT has been calculated for all road links that fall within 200m of each European site listed in **paragraph 3.5.5**. This data was assessed against Natural England's 1,000 AADT screening threshold for LSEs. The outputs indicate that the MLP would result in an exceedance of the 1,000 AADT threshold both alone and in-combination at road links within 200m of all European sites. It can therefore be concluded that the MLP has the potential to have likely significant air quality effects upon the European sites (detailed in **Table 3.1**), and this will be considered further in an AA.

Table 3.1: Atmospheric pollution impact pathways to European sites

European site within 10km radius of Plan area	Is the European site sensitive to air quality impacts (as indicated in SIP / NE Supplementary Conservation Advice – Appendix A)?	Is there a strategic road link (A and B roads) located within 200m of the European site?	Has the 1,000 AADT screening threshold been exceeded either alone or in combination?
Medway Estuary and Marshes Ramsar Medway Estuary and Marshes SPA	Yes	Minor road links and also the A228, A249, B2001 and B2004.	Yes
North Downs Woodlands SAC	Yes	Minor road links and also the A229 (Bluebell Hill) and A249 (Detling Hill)	Yes
Peter's Pit SAC	No	No	n/a
Queendown Warren SAC	Yes	No	n/a
Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	Yes	Minor road links and also the B2001, A228 and B2000	Yes
The Swale SPA The Swale Ramsar	Yes	Minor road links and also the A249, A299, B2045	Yes

3.6 Water quality and water quantity

3.6.1 Urban development coming forward through the MLP has the ability to affect water dependent European sites through a number of impacts as listed below. These impacts have the potential to change the water balance (levels) and the quality of water entering a European site:

- Change in surface permeability and run off rates.
- Increased water demand to supply new homes and businesses.
- Reduced quality of surface run off water.
- Increased effluent discharge for treatment from WWTWs.

3.6.2 A review of Natural England's SIP and Supplementary Advice information (**Appendix B**) indicates that there are several European sites located within the Plan area which are hydrologically sensitive including;

- North Downs Woodlands SAC
- Medway Estuary and Marshes Ramsar
- Medway Estuary and Marshes Ramsar SPA
- Thames Estuary and Marshes Ramsar
- Thames Estuary and Marshes SPA

- 3.6.3 Qualifying and notified features associated within the North Kent Marshes which may be sensitive to changes in the quality and quantity of water include a variety of birds, nationally scarce plants and Red Data Book wetland invertebrates. These species are detailed at **Appendix B**. Grassland and woodland habitats at the North Downs Woodlands SAC also require a hydrological regime to be maintained to meet site conservation objectives.
- 3.6.4 European sites located outside the Plan area can also be affected by changes in water supply and quality where they are hydrologically linked to development in the MLP.
- 3.6.5 Decisions relating to water abstraction for supply and disposal of water are controlled through a number of licensing mechanisms and a high-level water planning framework which is subject to HRA. This ensures the protection of the water environment and compliance with the Water Framework Directive (WFD).
- 3.6.6 The Plan area lies within the Thames River Basin District and within the Medway Surface Water Management Catchment (SWMC) area⁴⁶ (see **Figure 3.1**). The lower reaches of the River Medway run through the Plan area, entering to the south of Halling before reaching the Estuary at Rochester. The Medway catchment contains a large amount of urban development including the towns of Chatham, Rochester, Gillingham and Strood. Areas around the upper Estuary have a legacy of heavy manufacturing industry. The estuaries of the River Medway and the River Thames are located to the north of the Plan area. The Medway Estuary forms a single tidal system with the Swale and feeds into the outer Thames Estuary between the Isle of Grain and Sheerness. The Thames Estuary is contiguous with the Medway and the Swale Estuaries. The tidal influence of the River Medway and River Thames means that water levels are governed by extreme sea levels within the estuary. The north of Medway is dominated by marshland, which is drained by a network of man-made ditches, the primary function of which is to maintain lower water levels across the marshlands. The drainage ditches across the Cliffe Marshes, Cooling and Halstow Marshes, Allhallows Grain and Stoke Marshes all drain into the River Thames.⁴⁷
- 3.6.7 The Thames River Basin Management Plan (RBMP)⁴⁸ provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. It provides strategic level policy guidance in relation to baseline classification of water bodies, statutory objectives for protected areas and water bodies, and a summary of measures to achieve statutory protection.

⁴⁶ Environment Agency (2019) Catchment Data Explorer. Available at: <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/6> [Date Accessed: 24/04/25].

⁴⁷ Herrington Part of eps (2025) Medway Council Strategic Flood Risk Assessment.

⁴⁸ Environment Agency (2015) Thames River Basin Management Plan.

- 3.6.8 Medway is located in an area of serious water stress as identified by the Environment Agency (EA)⁴⁹. Southern Water and South East Water are the statutory water suppliers for Medway, with Southern Water supplying water to most of the authority and South East Water supplying Halling⁵⁰. These water companies are regulated by the EA for abstraction of fresh water and treatment of wastewater. It is a statutory requirement that every five years water companies produce and publish a Water Resources Management Plan (WRMP). The WRMP demonstrates long term plans to accommodate the impacts of population growth, drought, environmental obligations, and climate change uncertainty in order to balance supply and demand. WRMP's are linked to Drought Plans which detail the steps that would be taken to ensure that supplies can be maintained whilst minimising the impacts to rivers and the environment during drought events.
- 3.6.9 A WRZ is an area within which water supply and demand are primarily managed independently, with potential bulk transfers of water between zones. The Plan area falls within Southern Water's Eastern Area Water Resource Zone (WRZ) and within South East Water's WRZs 6 (Maidstone). The EA prepares Abstraction Licensing Strategies (ALS) through its Catchment Abstraction Management Strategy (CAMS) process. These ALSs are prepared for each sub-catchment within a river basin. The CAMS process aims to assess the amount of water available for further abstraction licensing, taking into account environmental needs and implementation of the RBMPs and water abstraction plans⁵¹. The CAMS process is published in a series of ALSs for each river basin. Water abstraction by water companies and private individuals within a catchment is managed by a regulated permitting system for existing licences.
- 3.6.10 The Plan area lies within the Medway ALS area (**Figure 3.2**) which provides information about the availability of water for further abstraction and gives an indication of the reliability of the new source. There are hydrological links between the Plan area and a number of European sites due to their location within this ALS area (**Table 3.2**). ALS are important in relation to the RBMP as they assist in determining current and future pressures on water resources and how the supply and demand will be managed by the relevant water companies through WRMPs.

Table 3.2: Hydrologically sensitive European sites within the Medway ALS catchment areas

ALS catchment area	Hydrologically sensitive European sites within ALS catchment area
Medway ALS ⁵²	• Medway Estuary and Marshes Ramsar • Medway Estuary and Marshes SPA • North Downs Woodlands SAC • Queendown Warren SAC • Peters Pit SAC • Thames Estuary and Marshes Ramsar • Thames Estuary and Marshes SPA

⁴⁹ Environment Agency (2021) Water Stressed Areas - final classification. Available at: <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification> [Date Accessed: 24/04/25].

⁵⁰ Medway Council (2017) Medway Infrastructure Position Statement.

⁵¹ DEFRA (2021). Policy Paper: Water Abstraction Plan.

⁵² Environmental Agency (2013) Medway Abstraction Licensing Strategy.

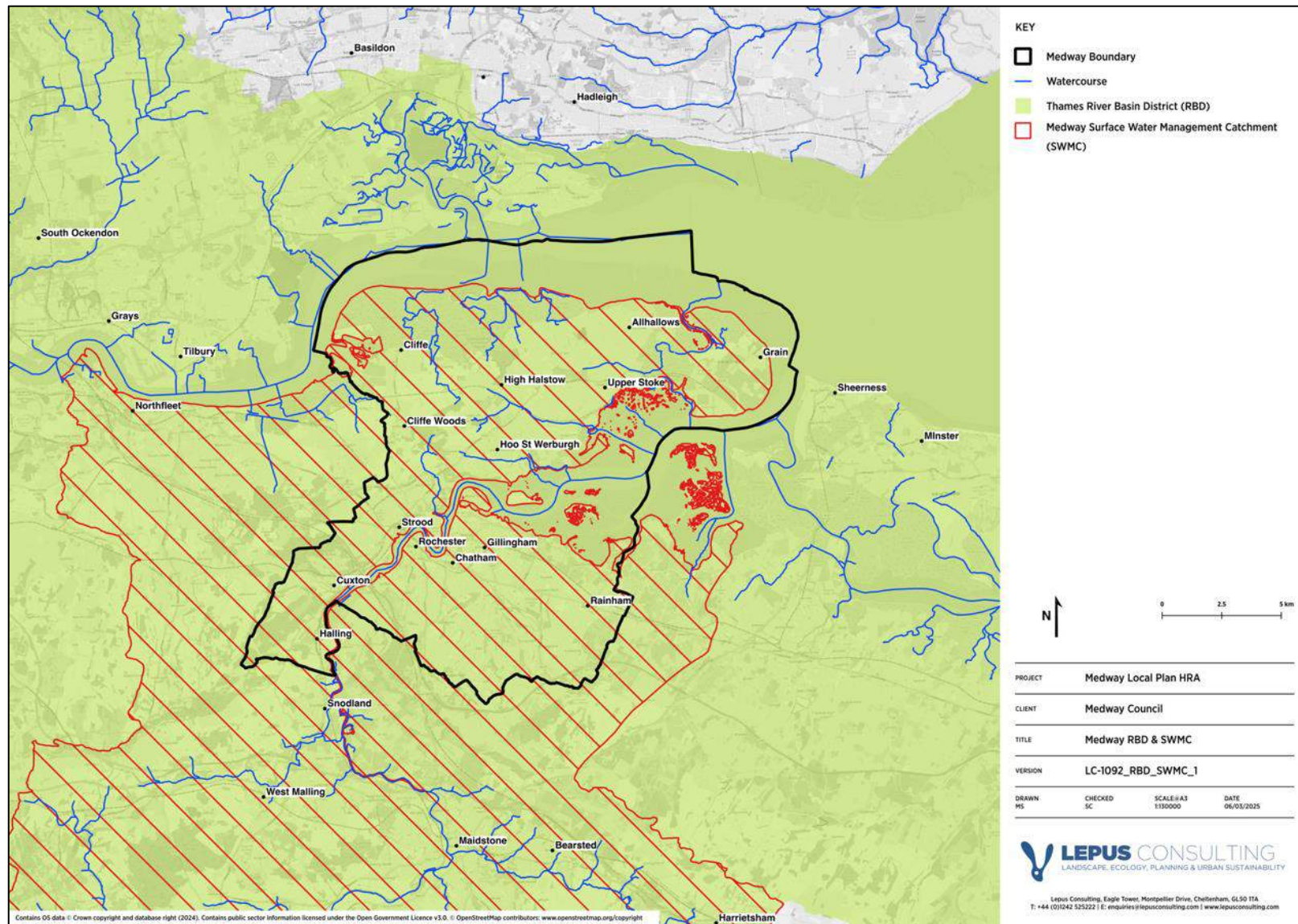


Figure 3.1: Medway water management catchments

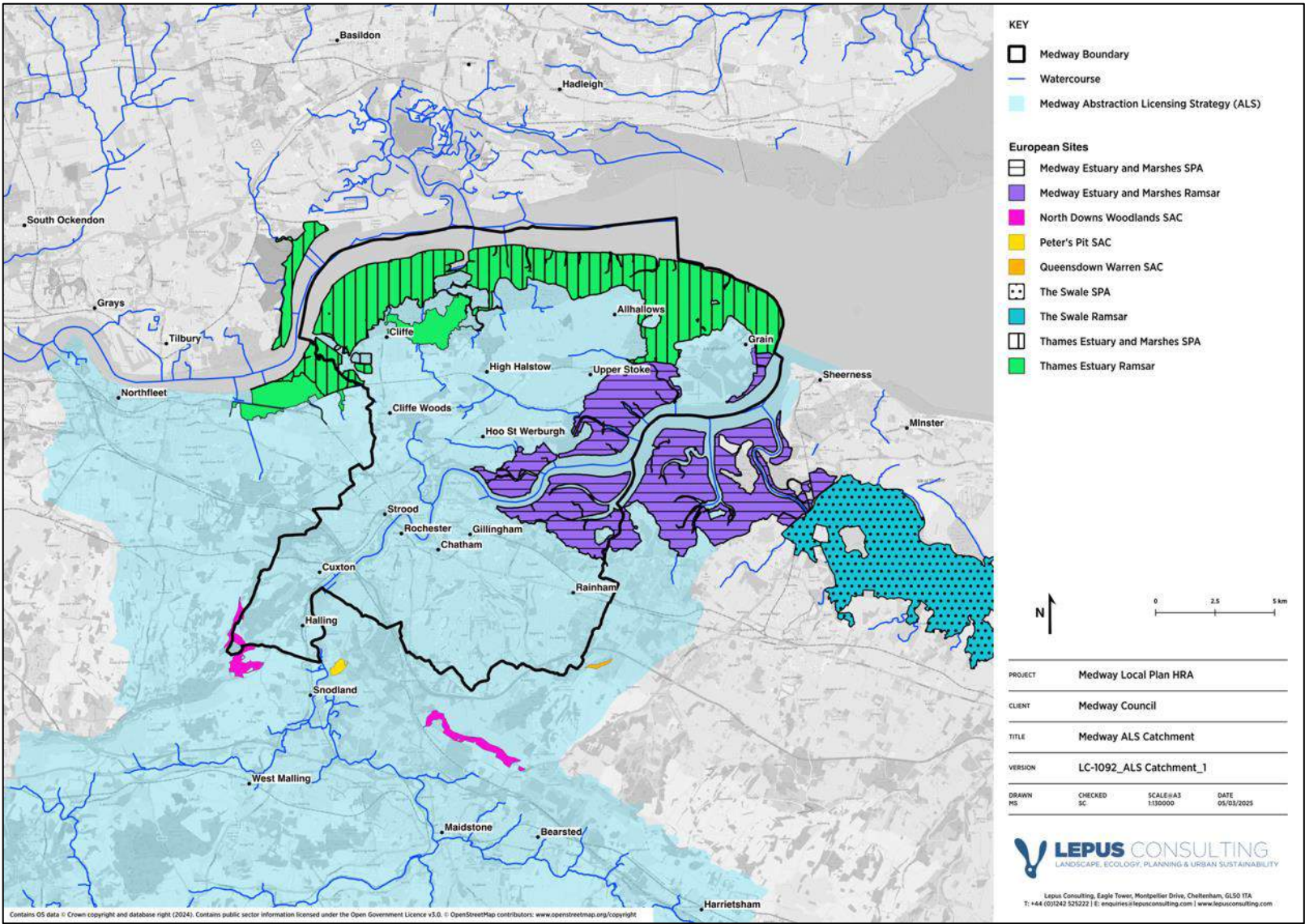


Figure 3.2: Medway hydrological connectivity to European sites

3.6.11 European sites were assessed for potential hydrological impact pathways taking into consideration potential changes in water levels (through abstraction for water supply) and water quality (through surface water run-off and discharges from WwTWs). **Table 3.3** indicates which European sites will be scoped into the screening assessment for further consideration in the HRA process in terms of hydrological impact pathways as reported in **Chapter 4**.

Table 3.3: Review of hydrological impact pathways to European sites within the influence of the MLP

European site with hydrological links to the MLP area	Sensitive to hydrological impacts (water quality and water quantity)?	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
Medway Estuary and Marshes SPA Medway and Marshes Estuary Ramsar	Yes	The SPA and Ramsar are located downstream of the Plan area and are hydrologically connected. Therefore, water quality impact pathways will be considered further in the HRA process.	The Medway Estuary and Marshes designations are located within the Medway ALS catchment, therefore there is a potential for water quantity impacts as a result of the MLP and associated water abstraction for new development.	Yes
North Downs Woodlands SAC	Yes	Given the location of the SAC upstream of the Plan area and due to its substrate and elevated position within the landscape, it is considered unlikely that there will be any water quality impact pathways from the MLP.	The North Downs Woodlands SAC is located within the Medway ALS catchment, therefore there is a potential for water quantity impacts as a result of the MLP and associated water abstraction for new development.	Yes

European site with hydrological links to the MLP area	Sensitive to hydrological impacts (water quality and water quantity)?	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
Peter's Pit SAC	Yes	The citation for Peter's Pit SAC notes that it is an old chalk quarry with adjoining soil-stripped fields on the North Downs, with scattered ponds situated amongst grassland, scrub and woodland. The ponds have widely fluctuating water levels and support large breeding populations of Great Crested Newt (<i>Triturus cristatus</i>). The site has an undulating terrain in which many rain-fed ponds, of various sizes, have developed. Given the rain-fed nature of these ponds and the site's location upstream of the Plan area, it is unlikely that there will be any water quality impact pathways.	Whilst Peter's Pit SAC is located within the Medway ALS catchment, given the rain-fed nature of its ponds (as defined in the SAC citation ^{53, 54}), it is unlikely that there will be any water quantity impact pathways. In addition, it is located over 400m from the Plan area and upstream, and therefore is unlikely to be affected by direct run off from new development associated with the MLP.	No
Queendown Warren SAC	No	Queendown Warren SAC is designated for the semi-natural dry grassland and scrubland habitats that it supports. The SIP for this designation does not list hydrology as a threat ⁵⁵ . Given its location in relation to the Plan area, it is unlikely that there will be any water quality impact pathways from the MLP.	Whilst Queendown Warren SAC is located within the Medway ALS catchment. As hydrology is not identified as a threat at this SAC, it is unlikely there will be any water quantity impact pathways.	No

⁵³ English Nature (2005) Citation for SAC.

⁵⁴ In addition, the citation for the underpinning SSSI notes 'An active chalk quarry until about 20 years ago, Peters Pit has an undulating terrain in which many rain fed ponds, of various sizes, have developed. Those which dry up early in the season are of less interest, but five ponds are sufficiently large to support very substantial populations of amphibians, particularly the great crested newt'. Source: Natural England Designated Site Viewer: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1001745.pdf>

⁵⁵ Natural England (2015) Queendown Warren SAC Site Improvement Plan.

European site with hydrological links to the MLP area	Sensitive to hydrological impacts (water quality and water quantity)?	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
The Swale SPA The Swale Ramsar	Yes	The SPA and Ramsar are located downstream of the Plan area and are hydrologically connected. Therefore, water quality impact pathways will be considered further in the HRA process.	The Swale designations are located within the Medway ALS catchment, therefore there is a potential for water quantity impacts as a result of the MLP and associated water abstraction for new development.	Yes
Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	Yes	The SPA and Ramsar are located downstream of the Plan area and are hydrologically connected. Therefore, water quality impact pathways will be considered further in the HRA process.	The Thames Estuary and Marshes designations are located within the Medway ALS catchment, therefore there is a potential for water quantity impacts as a result of the MLP and associated water abstraction for new development.	Yes

3.7 Recreational pressure

- 3.7.1 Increased recreational pressure at European sites can result in damage to habitats through erosion and compaction, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, dog fouling and tree climbing etc.
- 3.7.2 A common approach taken across the UK to address recreational impacts at European sites is to establish a Zone of Influence (Zoi) based on detailed visitor survey data. The Zoi is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance at which 75% of interviewees surveyed have travelled to reach a particular site (based on a review of visitor survey data).
- 3.7.3 The broad principle of buffer zones is one component of the HRA screening process for recreational pressures. This process also takes into consideration other factors such as recreational management at sites, proximity to settlements and existing recreational resources. Where available, buffer distances have been applied to determine potential pathways of recreational and urbanisation effects from the MLP.

- 3.7.4 The recreational draw of a European site depends on a number of factors. These include the extent and range of facilities provided (in particular parking), accessibility both within the European site and links to the wider area, incorporation of a European site as part of a wider designation such as a National Park and the site's promotion. A review of recreational impact assessments undertaken for other European sites across the UK indicates visitors typically live within 4.2 km (overall median value) of nature conservation sites and that the majority (75%) live within 12.6 km⁵⁶. However, this review recognises that some visitors are prepared to travel longer distances to visit particular sites, for instance coastal and wetland sites.
- 3.7.5 A large body of research has been undertaken into the effect of recreational disturbance upon birds^{57,58}. This has shown that disturbance can result in complex behavioural effects, such as a change in feeding behaviour, reduced breeding success⁵⁹ (due to nest abandonment and increased predation) and wasted energy expenditure due to birds taking flight⁶⁰. The research notes that response differs between species depending on visual and audible disturbances and other external factors⁶¹ such as food resource availability.

⁵⁶ Weitowitz, D, C. Panter, C. Hoskin, R. and Liley, D. (October 2019) The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology*, Volume 5, Issue 1.

⁵⁷ Mitchell J.R., Moser M.E. & Kirby J.S. (1988) Declines in the midwinter counts of waders roosting on the Dee estuary. *Bird Study* 35:191-198.

⁵⁸ Smit C.J. and Visser J.M. (1993) Effects of disturbance on shorebirds: a summary of existing knowledge from the Dutch Wadden Sea and Delta area. *Wader Study Group Bulletin* 68: 53-58.

⁵⁹ Liley, D and Sutherland, W. (2007) Predicting the population consequences of human disturbance for Ringed Plovers *Charadrius hiaticula*: a game theory approach. *Ibis* 149(1): 82- 94.

⁶⁰ Riddington, R., Hassall, M., Lane, S.J., Turner, P.A. and Walters, R. (1996) The impact of disturbance on the behaviour and energy budgets of Brent Geese *Branta b. bernicla*. *Bird Study* 43(3): 269-279.

⁶¹ Cayford, J. T. (1993) Wader disturbance: a theoretical overview. *Wader Study Group Bull.* 68:3-5.

- 3.7.6 Bird populations associated with the Thames Estuary and Marshes SPA, Thames Estuary and Marshes Ramsar, Medway Estuary and Marshes SPA, Medway Estuary and Marshes Ramsar, the Swale SPA and the Swale Ramsar designations are vulnerable to recreational impacts. Research has been undertaken to document the effects of bird disturbance⁶² and visitor surveys have been undertaken to determine visitor use of the shoreline and collate visitor origin data^{63,64}. In 2014, based on this work, the North Kent Strategic Access Management and Monitoring Strategy (SAMMS)⁶⁵ established a strategy to resolve disturbance issues to wintering birds on the North Kent Marshes. Bird Wise is the brand name of the North Kent SAMMS Board, a partnership of local authorities, developers and environmental organisations working together to mitigate disturbance to birds that winter in North Kent⁶⁶. A 6km Zol has been identified from the North Kent Marshes within which recreational impacts are likely. The updated five-year Bird Wise strategy was published in December 2024⁶⁷ and took into consideration new evidence on bird disturbance impacts from recreational activities⁶⁸, the efficacy and costings for SAMMS projects and the proposed level of planned growth within the Zol over the Strategy period.
- 3.7.7 The North Downs Woodlands SAC is split over two locations, the first of which contains part of the Halling to Trottiscliffe Escarpment SSSI, and the second which contains part of the Wouldham to Detling Escarpment SSSI. A small proportion of the SAC near Upper Halling falls within Medway's boundary. The SIP for the North Downs Woodland SAC⁶⁹ notes that off-road vehicles as well as all-terrain bikes are having an impact on parts of the woodland. It states that vehicle damage is associated with vehicles coming off the Public Rights of Way (PRoW) network into the woodland. There has been no visitor survey work undertaken across the North Downs Woodlands SAC to determine a recreational Zol. Boxley Warren Local Nature Reserve (LNR) forms part of the Wouldham to Detling Escarpment SSSI component of the SAC (outside the Plan area). A survey was undertaken at the LNR⁷⁰ in 2012 which found that 75% of visitors to the site travelled up to 7km to visit the LNR. The outputs of this survey have been used as a precautionary guide to inform this preliminary scoping assessment.
- 3.7.8 Public access and disturbance effects have been identified as a threat and pressure at several European sites. The output of the scoping review is summarised in **Table 3.4** and has been drawn on for the screening assessment (reported in **Chapter 4**).

⁶² Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

⁶³ Fearnley, H. & Liley, D. (2011). North Kent Visitor Survey Results. Footprint Ecology.

⁶⁴ Liley, D., Lake, S. & Fearnley, H. (2012). Phase I – Bird Disturbance Report. Footprint Ecology/GGKM/NE

⁶⁵ Liley, D. & Underhill-Day, J. (2013). Thames, Medway, and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology.

⁶⁶ Birdwise. About birdwise. Available at: <https://northkent.birdwise.org.uk/about/> [Date Accessed: 17/01/25].

⁶⁷ North Kent Bird Wise (2024) Mitigation Strategy 2024 – 2029.

⁶⁸ Kent Wildlife Trust Consultancy Service (2022) North Kent SAMMS – Bird Disturbance Surveys Winter 2021/22.

⁶⁹ Natural England (2015) North Downs Woodlands SAC SIP.

⁷⁰ Part of the Wouldham to Detling Escarpment SSSI section of the North Downs Woodlands SAC.

Table 3.4: Review of recreational disturbance impact pathways to European sites

European site	Sensitive to public access and disturbance effects?	Public access and disturbance impact pathways	Will the European site be scoped in for further assessment in the HRA process?
Medway Estuary and Marshes SPA Medway Estuary and Marshes Ramsar	Yes	The qualifying features of this designation are considered to be vulnerable to impacts associated with the MLP in terms of increased recreational pressure from growth. The designation provides a vast and linked expanse of important habitat to the SPA network around the British coastline⁷¹. Given the location of the MLP area within 6km of the North Kent Marshes, recreational disturbance impact pathways will be looked at further in the HRA process.	Yes
Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	Yes	The qualifying features of this designation are considered to be vulnerable to impacts associated with the MLP in terms of increased recreational pressure from growth. The designation provides a vast and linked expanse of important habitat to the SPA network around the British coastline⁷². Given the location of the MLP area within 6km of the North Kent Marshes, recreational disturbance impact pathways will be looked at further in the HRA process.	Yes
The Swale SPA The Swale Ramsar	Yes	The qualifying features of this designation are considered to be vulnerable to impacts associated with the MLP in terms of increased recreational pressure from growth. The designation provides a vast and linked expanse of important habitat to the SPA network around the British coastline⁷³. Whilst the Plan area is located outside the core North Kent SAMMS 6km area for the Swale SPA and Ramsar, larger developments outside this 6km zone should be considered on a case-by-case basis.	Yes
North Downs Woodlands SAC	Yes	Given the North Downs Woodlands SAC is located within the Plan area (and within the 7km distance visitors were shown to travel), it is considered to be sensitive to recreational impacts associated with the MLP and will therefore be scoped into the HRA process.	Yes
Peter's Pit SAC	No	Given the location of the SAC is outside the Plan area, and taking into consideration the features for which it is designated, it is considered unlikely that there will be recreational impact pathways. Recreational impacts at the SAC will not be considered further in this HRA.	No

⁷¹ Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

⁷² Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

⁷³ Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

European site	Sensitive to public access and disturbance effects?	Public access and disturbance impact pathways	Will the European site be scoped in for further assessment in the HRA process?
Queendown Warren SAC	No	Given the location of the SAC is outside the Plan area, and taking into consideration the features for which it is designated, it is considered unlikely that there will be recreational impact pathways. Recreational impacts at the SAC will not be considered further in this HRA.	No

3.8 Urbanisation effects

- 3.8.1 Urbanisation effects typically occur when development is located close to a European site boundary. Urbanisation effects may include noise and vibration disturbance, lighting effects, visual disturbance, cat predation, fly-tipping, wildfire, littering, vandalism and damage to / fragmentation of habitats. Research undertaken on behalf of Natural England explored threats and pressures at the North Kent Marshes⁷⁴. This body of work highlighted housing, industrial and other development as posing a considerable threat to the conservation objectives of the estuarine and coastal European sites in North Kent.
- 3.8.2 Urbanisation effects may take place at designated sites and also at FLL⁷⁵. This is especially important for the North Kent Marshes which are designated for their diversity of bird species and invertebrates among other factors. Certain species of birds, which include qualifying species, use a variety of habitats outside the designation boundary of a European site, for instance as foraging or high tide roost habitat. These habitats may be functionally linked where they play an important role in maintaining or restoring the population of a qualifying bird species at a favourable conservation status. The tests set out under Regulation 105 of the Habitats Regulations need to be applied in respect of plans which may significantly affect FLL. Given the mobile nature of the qualifying features of coastal sites, it is considered that urbanisation effects upon FLL is a potential impact pathway alongside direct urbanisation effects upon the North Kent Marshes.
- 3.8.3 For other mitigation strategies across the UK, a distance of 400m has been used to represent the distance from which people will access designated sites by foot (rather than accessing sites from car parking locations as with recreational impacts). A distance of 400m also reflects a precautionary distance over which cat predation takes place and an average buffer zone for noise, lighting and visual disturbance effects. Whilst this 400m distance is useful for the inland European sites, it is not necessarily appropriate for the North Kent Marshes given the nature of this peninsula environment.

⁷⁴ Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology. Available at: <https://northkent.birdwise.org.uk/research-and-strategy-reports/#researchReports> [Date Accessed: 28/04/25].

⁷⁵ "The term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore 'linked' to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status". Source: Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

- 3.8.4 Natural England's SSSI IRZs, described in **Section 3.3**, define areas around a SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts upon it. They also cover the interest features and sensitivities of European sites, which are underpinned by SSSI designations. The IRZs associated with the North Kent Marshes have therefore been used to flag up locations where development may have a potential impact upon both the designations themselves and also areas of FLL.
- 3.8.5 The Halling to Trottiscliffe Escarpment SSSI component of the North Downs Woodlands SAC is located within the southwestern corner of the Plan area. The SIP for the SAC indicates that Beech Forest is sensitive to illumination effects from urbanisation and therefore the SAC is also scoped in for assessment in the HRA process.
- 3.8.6 The output of the urbanisation scoping assessment is summarised in **Table 3.5**.

Table 3.5: Review of urbanisation impact pathways to European sites

European site name	Sensitive to urbanisation effects?	Urbanisation impact pathways	Will the European site be scoped in for further assessment in the HRA process?
Medway Estuary and Marshes SPA Medway Estuary and Marshes Ramsar	Yes	The SPA and Ramsar are located within the Plan area. The underpinning SSSI IRZs flag up development in the Plan area for consultation with Natural England. Urbanisation effects will therefore be considered further in the HRA process and are scoped in. Given the mobile nature of qualifying features associated with these designations, it is also considered that FLL may be impacted by urbanisation effects.	Yes
Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	Yes	The SPA and Ramsar are located within the Plan area. The underpinning SSSI IRZs flag up development in the Plan area for consultation with Natural England. Urbanisation effects will therefore be considered further in the HRA process and are scoped in. Given the mobile nature of qualifying features associated with these designations, it is also considered that FLL may be impacted by urbanisation effects.	Yes
The Swale SPA The Swale Ramsar	Yes	Whilst the SPA and Ramsar are not located within the Plan area, given the mobile nature of qualifying features associated with these designations, it is also considered that FLL may be impacted by urbanisation effects.	Yes
North Downs Woodlands SAC	Yes	The SAC is located within the Plan area. The underpinning SSSI IRZ flags up development in the Plan area for consultation with Natural England. Urbanisation effects will therefore be considered further in the HRA process and are scoped in.	Yes

European site name	Sensitive to urbanisation effects?	Urbanisation impact pathways	Will the European site be scoped in for further assessment in the HRA process?
Peter's Pit SAC	No	Peter's Pit SAC is not located within the Plan area. The SAC is designated for Great Crested Newts (<i>Triturus cristatus</i>). Whilst Great Crested Newts rely on water bodies to breed and during the aquatic stages of their life cycle, they are known to travel approximately 500m from their breeding pond habitat during the terrestrial phase of their lifecycle ^{76,77} . Whilst the MLP area is located at its closest point 450m from the SAC, a review of aerial photography indicates that it is separated from the Plan area by the River Medway. This is likely to create a barrier to movement for newts. It is therefore considered that functionally linked Great Crested Newt habitat will not be affected by development set out in the MLP and this SAC can therefore be scoped out of the HRA process.	No
Queendown Warren SAC	No	As Queendown Warren SAC is not located within the Plan area and does not support mobile species, this SAC can be scoped out of the HRA process.	No

3.9 Coastal squeeze

3.9.1 As sea levels rise the low-lying North Kent Marshes are subject to 'coastal squeeze'. This is the process by which coastal defences prevent intertidal habitats from migrating landwards and are therefore subsumed by rising sea levels⁷⁸. The European site designations of the North Kent Marshes are vulnerable to habitat loss through this process as rising sea levels squeeze it close to existing defences. The Environment Agency estimates a total loss of saltmarsh over the next 100 years in the Medway Estuary and Swale area of 113ha (0-20 years), 140ha (21-50 years), and 308ha (51-100 years)⁷⁹.

3.9.2 The Strategic Flood Risk Assessment (SFRA)⁸⁰ prepared in support of the MLP indicates that the entire coastline within the Plan area benefits from flood defences, with the exception of All Hallows-on-Sea. Coastline and tidal defences in the Medway Plan area are managed through the Environment Agency's Medway Estuary and Swale (MEAS) Flood and Coastal Erosion Risk Management (FCERM) Strategy⁸¹ and Thames Estuary 2100 (TE2100)⁸².

⁷⁶ Natural England (2015) Great crested newts: protection and licences.

⁷⁷ Langton, T.E.S., Beckett, C.L., and Foster, J.P. (2001), Great Crested Newt Conservation Handbook, Froglife, Halesworth.

⁷⁸ Arup (2018) Medway Local Plan Development Strategy. Interim Consideration of the Implications of Development Strategy Scenarios on European sites.

⁷⁹ Environment Agency (2018). Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy – Non Technical Summary (MEASS). [Date Accessed: 10/06/25].

⁸⁰ Herrington (2025) Strategic Flood Risk Assessment Medway Council.

⁸¹ Environment Agency (2018). Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (MEASS). [Date Accessed: 10/06/25].

⁸² Environment Agency (2021) Thames Estuary (TE) 2100 Plan. Available at: <https://www.gov.uk/government/collections/thames-estuary-2100-te2100> [Date Accessed: 10/06/25].

- 3.9.3 In 2019 Defra approved the Environment Agency's MEAS⁸³. MEAS sets out the approach to manage flood risk and coastal erosion risk over the next 100 years. The Environment Agency has begun a 10-year programme of work to carry out the recommendations of MEAS. The programme includes the following measures:
- Twelve schemes to refurbish and/or raise existing flood defences.
 - Six schemes to realign defences and create compensatory intertidal habitat - this will replace what is lost because of sea level rise.
 - The creation of freshwater habitat this will maintain the integrity of the designated sites, whilst allowing coastal adaptation.
 - Sustainable asset management decisions⁸⁴.
- 3.9.4 MEAS contains three policies for flood defence as follows:
- Hold the line - build or maintain artificial defenses so that the position of the shoreline remains.
 - Managed realignment - allowing the shoreline to move naturally, but managing the process.
 - No active intervention or sustainable asset management - no planned investment to defend against flooding or erosion- this is the case whether or not an artificial defense has existed before.
- 3.9.5 The Plan area sits within four Benefit Areas as defined by MEAS⁸⁵; BA01 – North Medway, BA02 – Medway Towns, BA03 – Upper Medway and BA04 – Medway Marshes.
- 3.9.6 Defences across the North Medway Benefit Area will be predominantly maintained and raised with no active intervention in some areas. In addition to the immediate west of Kingsnorth on the Hoo Peninsular there will be a managed realignment site to offset the impacts of coastal squeeze. In the Medway Towns Benefit Area the strategy is to improve existing defences and locally raise these in parts with an area in Rochester subject to no active intervention. In the Upper Medway Benefit Area (where it coincides with the Plan area) measures will focus on no active intervention, with new setback embankments provided at Halling Marshes. In addition, there will be the construction of a managed retreat site at Halling Marsh to help compensate for the Strategy wide coastal squeeze impacts. In the Medway Marshes Benefit Area (where it is coincident with the Plan area) the focus will be on raising existing defences and the provision of setback embankments in areas such as Danes Hill, with no active intervention in Motney Hill. New development set out in the MLP must not compromise the ability to deliver the managed retreat sites set out for each Benefit Area.

⁸³ Environment Agency (2018). Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (MEASS). [Date Accessed: 10/06/25].

⁸⁴ Environment Agency (2024). Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (MEASS). Available at: <https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy> [Date Accessed: 10/06/25].

⁸⁵ A term used in the MEAS to refer to the 11 individual flood and erosion cells or areas which the Strategy has been broken down into to undertake the Options Appraisal.

- 3.9.7 MEAS was supported by an HRA⁸⁶ which showed that MEAS would have adverse effects on intertidal habitats, due to coastal squeeze. The MEAS HRA indicated that there would also be an adverse impact on freshwater habitats due to managed realignment and no active intervention. The MEAS HRA identified the requirement for compensatory freshwater habitat, to compensate for the loss of designated freshwater habitats and coastal squeeze impacts on the SPA and Ramsar interest features. The creation of freshwater habitat will maintain the integrity of these designated sites, whilst allowing coastal adaptation. The two areas of compensatory habitat set out in MEAS which are within the Plan area include Abbots Court on the Hoo Peninsula and Danes Hill close to Riverside Country Park⁸⁷. New development set out in the MLP must not compromise the ability of required areas for compensation habitat to be delivered.
- 3.9.8 TE2100 has been developed by the Environment Agency and outlines how to manage risks from climate change and sea level rise along the Thames coastline which extends into the Plan area. The area of relevance to Medway is the North Kent Marshes and Isle of Grain Policy Units. The North Kent Marshes Policy Units comprises two large areas located to the north and west of the village of Cliffe. Policy 3 of this strategy applies to this area and means that the Environment Agency will maintain flood defences at their current level, supported by Riverside Strategies⁸⁸. The Isle of Grain Policy Unit includes the village of Allhallows, freshwater marshes and industrial infrastructure but does not include the village of Grain. Policy 4 applies to this area which mean that the Environment Agency will take further action to keep up with climate and land use change so that flood risk does not increase⁸⁹. To compensate for coastal squeeze, through TE2100 the Environment Agency has worked with the Royal Society for the Protection of Birds (RSPB) to create compensatory habitat at Wallasea Island (Essex), and DP World London Gateway to create compensatory habitat at Salt Fleet Flats Reserve (Medway Kent) - together, these schemes compensate for habitat losses projected in the TE2100 by 2025 (58 hectares). New development set out in the MLP must not compromise the ability of required areas for compensation habitat to be delivered.
- 3.9.9 MEAS and TE2100 enables more local policies, which promote a combination of 'Hold the Line' and 'Managed Realignment' options, as set out in the Medway Estuary and Swale Shoreline Management Plan⁹⁰ and Isle of Grain to South Foreland Shoreline Management Plan⁹¹. Flood defence in the Plan area will be designed in compliance with MEAS and TE2100 and also the Shoreline Management Plans which sit under these higher-level policy documents.
- 3.9.10 The output of the coastal squeeze scoping assessment is summarised in **Table 3.6**.

Table 3.6: Review of coastal squeeze impact pathways to European sites

⁸⁶ Environment Agency (2018). Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Report – Technical Appendix K: Habitats Regulations Assessment.

⁸⁷ Environment Agency (2018) Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Report – Technical Appendix K – HRA.

⁸⁸ Environment Agency (2023) North Kent Marshes Policy Unit. Available at: <https://www.gov.uk/guidance/north-kent-marshes-policy-unit-thames-estuary-2100> [Date Accessed: 18/06/25]

⁸⁹ Environment Agency (2023) Isle of Grain Policy Unit. Available at: <https://www.gov.uk/guidance/isle-of-grain-policy-unit-thames-estuary-2100> [Date Accessed: 18/06/25]

⁹⁰ Halcrow Group Ltd (2010). Medway Estuary and Swale Shoreline Management Plan.

⁹¹ Halcrow Group Limited (2010). Isle of Grain to South Foreland Shoreline Management Plan Review 2010.

European site name	European site located within coastal area	European site scoped in for further consideration?
Medway Estuary and Marshes SPA Medway Estuary and Marshes Ramsar	Yes	Yes
Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	Yes	Yes
The Swale SPA The Swale Ramsar	Yes	No as located outside MLP area
Peter's Pit SAC	No	No
Queendown Warren SAC	No	No

3.10 European sites and threats and pressures

3.10.1 **Figure 3.2** illustrates the location of European sites which will be scoped into the HRA process for further consideration in the screening assessment (**Chapter 4**). **Table 3.7** provides a summary of impacts which will be considered at each European site further in the HRA process.

Table 3.7: Summary of impact pathways to European sites which may be associated with the MLP

European site	Air quality	Water quality and/or water quantity	Recreational pressure	Urbanisation effects	Coastal squeeze
Medway Estuary and Marshes SPA Medway Estuary and Marshes Ramsar	Yes	Yes	Yes	Yes	Yes
North Downs Woodland SAC	Yes	Yes	Yes	Yes	No
Peter's Pit SAC	No	No	No	No	No
Queendown Warren SAC	No	No	No	No	No
Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	Yes	Yes	Yes	Yes	Yes
The Swale SPA The Swale Ramsar	Yes	Yes	Yes	Yes	No

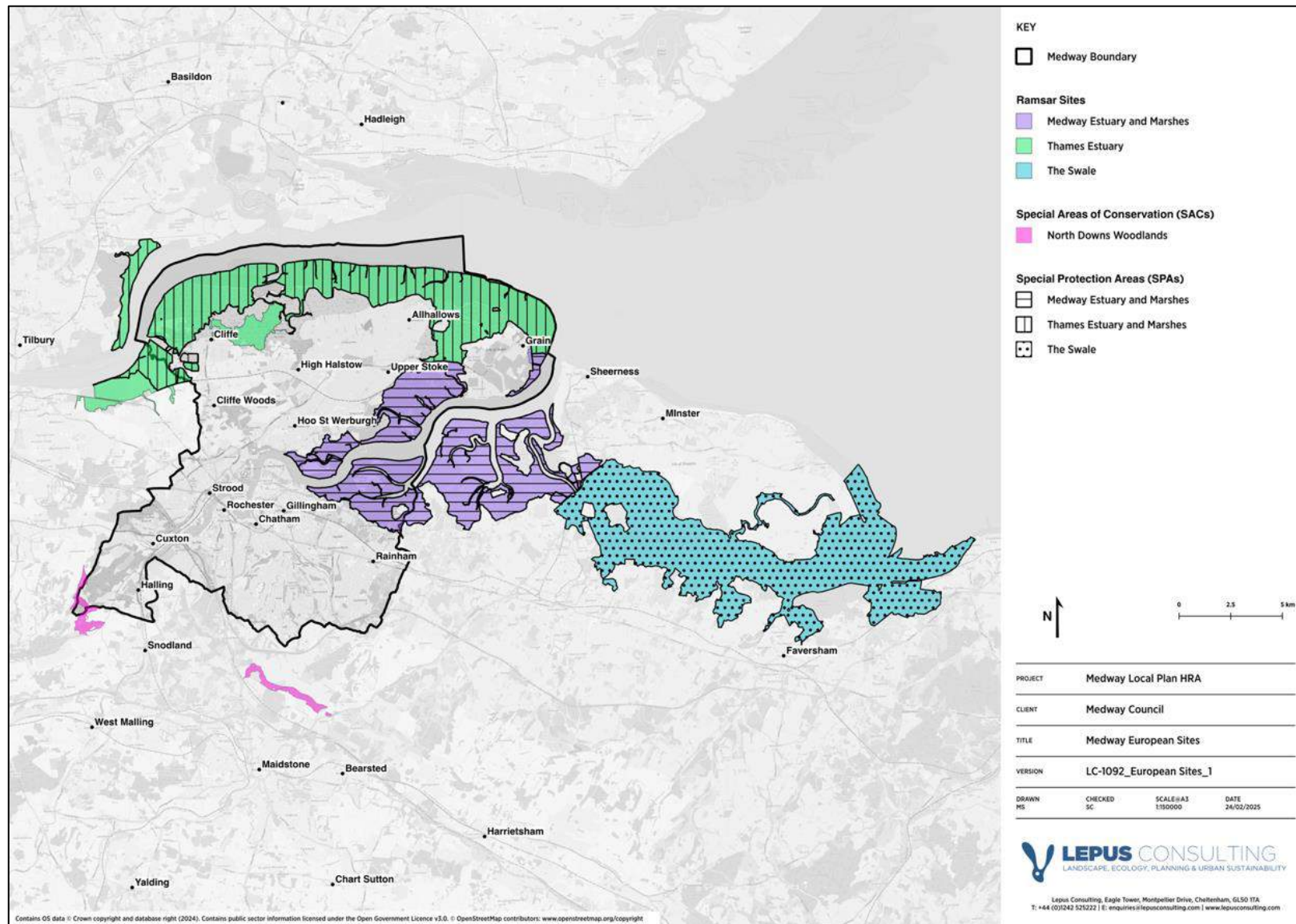


Figure 3.3: European sites scoped in for consideration in the HRA process

4 Screening of the Proposed Submission Draft MLP

4.1 Policy and allocations screening

- 4.1.1 Each policy and allocation which was evaluated in the Regulation 18 HRA⁹² during the Regulation 18 Local Plan Consultation (2024) against the HRA pre-screening criteria (see **Table 2.1**), taking into consideration case law and best practice (see **Section 1.3**). This concluded LSEs alone and in-combination at a number of European sites. The policies and allocations that form the MLP were re-screened as part of the HRA process to ensure all changes made in response to the Regulation 18 consultations were captured. **Appendices C and D** provide the output of this re-screening exercise which has informed the test of likely significance i.e. will the MLP have an LSE, alone or in-combination, at a European site.
- 4.1.2 It is concluded that LSEs, either from the MLP alone or in-combination with other plans or projects, could be screened out for most policies. This is because the policies fall into the following categories (see **Table 4.1** for a description of each category):
- **Category A:** General statements of policy / general aspirations
 - **Category D:** Environmental protection / site safeguarding
 - **Category F:** Policies or proposals that cannot lead to development or other change
- 4.1.3 A number of policies were however considered likely to have an LSE on the basis of this assessment as they fall into the following categories:
- **Category I:** Policies or proposals with a likely significant effect on a site alone
 - **Category L:** Policies or proposals which might be likely to have a significant effect in combination
 - **Category M:** Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site
- 4.1.4 The following policies (**Table 4.1**) will therefore be explored in the AA (Stage 2 of the HRA process) in more detail.

⁹² Lepus Consulting (June 2024) Habitats Regulations Assessment of the Medway Local Plan Regulation 18.

Table 4.1: Summary of screened in policies

(Note: only policies screened into the HRA process have been included in the summary table below. The screening outcome for all policies and allocations is provided at Appendix C)

Policy Number	Policy Name	Screening Category
N/A	Spatial Development Strategy	L
Policy S2	Conservation and Enhancement of the Natural Environment	M
Policy S3	North Kent Estuary and Marshes Designated Sites	M
Policy S5	Securing Strong Green and Blue Infrastructure	L
Policy T7	Houseboats	L
Policy T9	Self-Build and Custom Housebuilding	L
Policy T10	Gypsy, Traveller & Travelling Showpeople	L
Policy S10	Economic Strategy	I
Policy S11	Existing Employment Sites	I
Policy S12	New Employment Sites	I
Policy S17	Chatham Town Centre	L
Policy S18	Rochester District Centre	L
Policy S19	Gillingham District Centre	L
Policy S20	Strood District Centre	L
Policy S21	Rainham District Centre	L
Policy S22	Hoo Peninsula	L
Policy S23	Hempstead Valley District Centre	L
Policy T20	Riverside Path	L
Policy DM16	Chatham Waters Line	L
Policy T21	Riverside Infrastructure	L
Policy T22	Marinas and Moorings	L
Policy T32	Supply of Recycled and Secondary Aggregates	I
Policy T33	Extraction of Land Won Minerals	I
Policy T36	Location of Waste Management Facilities	L
Policy T37	Other Recovery	L
Policy T38	Landfill	L
Policy T39	Beneficial Use of Inert Waste by Permanent Deposit	L
Policy T40	Wastewater Treatment	L
Policy S20	Energy Supply	I
Policy SA1	Chatham Town Centre and Surrounds	L
Policy SA2	Heritage-led Sites	L
Policy SA3	Gillingham District Centre	L

Policy Number	Policy Name	Screening Category
Policy SA4	River Waterfront	L
Policy SA5	Strood Town Centre and Surrounds	L
Policy SA6	Chapter Farm/Land west of Strood	L
Policy SA7	Capstone Valley	L
Policy SA8	Hoo St Werburgh and Chattenden	L
Policy SA9	High Halstow	L
Policy SA10	Lower Rainham	L
Policy SA11	Rural Settlements	L
Policy SA12	Other Sites	L
Policy SA13	Frindsbury Peninsula Opportunity Area	L
Policy SA14	Employment Sites	L

4.1.5 All allocations were considered to have a potential alone (Category I) or in-combination (Category L) LSE upon European sites and areas of FLL, due potential air quality, water quality and quantity, recreational pressure and urbanisation effects (**Appendix D**). All allocations were therefore screened into the HRA process.

4.1.6 No LSEs were identified at Peter's Pit SAC or Queendown Warren SAC and these European sites are therefore screened out. As there are no site allocations located within 400m of the North Downs Woodlands SAC, urbanisation effects are unlikely at this SAC and this impact pathway has been screened out (see **Appendix D**). Consideration has been given to the location of site allocations in relation to required compensatory habitat or managed realignment sites as set out in the MEAS⁹³ and TE2100⁹⁴. Policy 9 of the MLP notes that allocation sites have been identified to support flood risk works under the MEAS and TE2100 programmes and therefore no allocation coincides with an area of a compensatory habitat site or managed realignment site. Coastal squeeze LSEs have can therefore be screened out.

4.1.7 LSEs were identified at the following European sites:

- **Medway Estuary and Marshes SPA** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **Medway Estuary and Marshes Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **Thames Estuary and Marshes SPA** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **Thames Estuary and Marshes Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.

⁹³ Environment Agency (2019) Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Available at: <https://ea.sharefile.com/share/view/s53042b8483441048/foaa518c-77f9-4111-8a59-23a6f61add9c> [Date Accessed: 29/04/25].

⁹⁴ Environment Agency (2021) Thames Estuary (TE) 2100 Plan. Available at: <https://www.gov.uk/government/collections/thames-estuary-2100-te2100> [Date Accessed: 10/06/25].

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- **The Swale SPA** – air quality, hydrology, recreational pressure and urbanisation impacts.
 - **The Swale Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
 - **North Downs Woodlands SAC** – air quality, hydrology and recreational pressure.

4.2 Screening Conclusion

- 4.2.1 As required under Regulation 105 of the Habitats Regulations, an assessment of LSEs of the MLP upon European sites has been undertaken. The screening checks (**Appendix B** and **C**) indicate that the MLP has the potential to have LSEs at a number of European sites, both alone, and for a number of policies and allocations, in-combination. The MLP is not directly connected with or necessary to the management of any European site. The screening assessment takes no account of mitigation measures that the MLP may incorporate to mitigate adverse impacts upon European sites. It is therefore concluded that the MLP will be screened into the HRA process. The next stage of the HRA process will be Stage 2, Appropriate Assessment.

5 Air Quality Appropriate Assessment

5.1 Introduction

5.1.1 The HRA screening process in **Chapter 4** concluded that a number of MLP policies (**Appendix C**) and all allocations when taken cumulatively (**Appendix D**) have the potential to result in LSEs at the Medway Estuary and Marshes SPA, the Medway Estuary and Marshes Ramsar, the Thames Estuary and Marshes SPA, the Thames Estuary and Marshes the Thames Estuary and Marshes Ramsar, the Swale SPA, the Swale Ramsar and the North Downs Woodlands SAC due to changes in air quality.

5.1.2 Policies with potential to have recreational impacts and which are therefore screened into the HRA process include:

- Policy T9 – Self-Build and Custom Housebuilding
- Policy T10 – Gypsy, Traveller & Travelling Showpeople
- Policy S10 – Economic Strategy
- Policy S11 – Existing Employment Sites
- Policy S12 – New Employment Sites
- Policy S17 – Chatham Town Centre
- Policy S18 – Rochester District Centre
- Policy S19 – Gillingham District Centre
- Policy S20 – Strood District Centre
- Policy S21 – Rainham District Centre
- Policy S22 – Hoo Peninsula
- Policy S23 – Hempstead Valley District Centre
- Policy T32 – Supply of Recycled and Secondary Aggregates
- Policy T33 – Extraction of Land Won Materials
- Policy T36 – Location of Waste Management Facilities
- Policy T37 – Other Recovery
- Policy T38 – Landfill
- Policy T39 – Beneficial Use of Inert Waste by Permanent Deposit
- Policy T40 – Wastewater Treatment
- Policy S25 – Energy Supply
- Policy SA1 – Chatham Town Centre and Surrounds
- Policy SA2 – Heritage-led Sites
- Policy SA3 – Gillingham District Centre
- Policy SA4 – River Waterfront
- Policy SA5 – Strood Town Centre and Surrounds
- Policy SA6 – Chapter Farm / Land west of Strood
- Policy SA7 – Capstone Valley
- Policy SA8 – Hoo St Werburgh and Chattenden
- Policy SA9 – High Halstow
- Policy SA10 – Lower Rainham
- Policy SA11 – Rural Settlements
- Policy SA12 – Other Sites

- Policy SA13 – Frindsbury Peninsula Opportunity Area
- Policy SA14 – Employment Sites

5.1.3 This assessment follows Natural England's current guidance and therefore assesses the likely effects to inform a conclusion as to whether an adverse effect on site integrity can be ruled out. The assessment also draws on the Chartered Institute of Ecology and Environmental Management (CIEEM's) guidance following a six-step methodology. It includes consideration of factors such as:

- Action needed to protect the condition of the European sites.
- The expected future trend in pollutants of concern (and the scientific reasonableness of any trend).
- The magnitude of any future 'in combination' dose and how it may change the trend
- The physical extent of the affected area as a proportion of that interest feature within the European sites⁹⁵.

5.2 Baseline information

Introduction to air pollutant critical loads and levels

5.2.1 In an attempt to manage the negative consequences of atmospheric pollution at designated sites, 'critical loads' and 'critical levels' have been established for ecosystems across Europe. Each European site is host to a variety of habitats and species with different sensitivities to different levels of air pollution. The critical loads of pollutants are defined as a "...quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge"⁹⁶. Critical levels are defined as "concentrations of pollutants in the atmosphere above which direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge"⁹⁷.

5.2.2 Nitrogen oxides (NOx) are produced from road traffic during the combustion processes, partly from nitrogen compounds in the fuel, but mostly by direct combination of atmospheric oxygen and nitrogen in flames⁹⁸. Road transport emissions of NOx in 2018 were the largest contributor to UK total emissions of NOx with most emissions related to diesel vehicles⁹⁹. The introduction of catalytic converters has seen an overall reduction in emissions since 1990. NOx has the potential to impact habitats through direct toxicity and through their contribution to nitrogen deposition. The critical level for all vegetation types from the direct toxic effects of NOx has been set at 30 µg/m³.

⁹⁵ CIEEM (January 2021) Paragraph 20. Advisory Note: Ecological Assessment of Air Quality Impacts.

⁹⁶ Coordination Centre for Effects (CCE). Critical load and level definitions. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Accessed: 28/04/25].

⁹⁷ Coordination Centre for Effects (CCE). Critical load and level definitions. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Accessed: 28/04/25]

⁹⁸ Air Pollution Information Systems (2017) Pollutants, NOx. Available at: https://www.apis.ac.uk/overview/pollutants/overview_NOx.htm [Accessed: 28/04/25].

⁹⁹ National Atmospheric Emissions Inventory. Available at: https://naei.beis.gov.uk/overview/pollutants?pollutant_id=6 [Accessed: 28/04/25].

- 5.2.3 Ammonia originates from both natural and anthropogenic sources, with the main man-made source being agriculture. Other man-made sources of ammonia include industrial processes and vehicular emissions (from catalyst-equipped petrol vehicles and selective catalytic reduction on light and heavy goods diesel fueled vehicles). As with NO_x, elevated levels of ammonia can be directly toxic to plants and can also enrich a system with nitrogen causing eutrophication and acidification effects on habitats.
- 5.2.4 Lichen species can be sensitive to even small increases in ammonia ($1 \mu\text{g}/\text{m}^3$)¹⁰⁰. As such, there are two critical levels for ammonia, $1 \mu\text{g m}^{-3}$ for lower plants (lichens and bryophytes¹⁰¹) and $3 \mu\text{g}/\text{m}^3$ for higher level plants (all other vegetation). Critical levels of ammonia which are relevant to each European site are set out in **Appendix E**.
- 5.2.5 The Air Pollution Information System (APIS) describes nitrogen deposition as “*the input of reactive nitrogen from the atmosphere to the biosphere both as gases, dry deposition and in precipitation as wet deposition*”¹⁰². Anthropogenic sources of enhanced reactive nitrogen deposition come from emissions of oxidised nitrogen (NO_x) and fossil fuel combustion and reduced nitrogen from agricultural sources.
- 5.2.6 Nitrogen is a major growth nutrient for plants. An increase in nitrogen can be toxic to plants and can lead to eutrophication which can cause species loss and changes in the structure and function of ecosystems. Nitrogen can also cause acidification of soils, the effects of which are discussed in more detail below (**paragraph 5.2.7**). Traffic related inputs of NO_x and ammonia have an impact on the rates of nitrogen deposition. Nitrogen deposition rates are habitat specific as different habitats have different tolerances to different levels. Nitrogen critical loads which are relevant to each European site are set out in **Appendix E**.
- 5.2.7 Acidification comprises the deposition of pollutants to soils which changes the pH level causing acidification. The contribution of SO₂ to acid deposition has reduced since the 1980s, with controls on transboundary emissions, so that the main contribution to acidification is from sources of oxidised and reduced nitrogen. The effect of acid deposition is indirect and related to the lowering of soil pH leading to reduced fertility and nutrient deficiencies, the release of toxic metals and changes in microbial transformations¹⁰³. As with nitrogen deposition, acid deposition rates are habitat specific. The sensitivity of European sites to acidification is set out in **Appendix E**.

¹⁰⁰ Air Pollution Information Systems. Pollutants, Ammonia. Available at: https://www.apis.ac.uk/overview/pollutants/overview_NH3.htm [Accessed: 16/10/24].

¹⁰¹ *Lichens and mosses are at most risk as they have limited detoxification capacity relative to their uptake potential and a large surface area relative to mass.* Source: Air Pollution Information Systems. Pollutants. Available at: http://www.apis.ac.uk/overview/pollutants/overview_NH3.htm [Date Accessed: 16/10/24].

¹⁰² APIS. Nitrogen Deposition. Available at: https://www.apis.ac.uk/overview/pollutants/overview_N_deposition.htm [Date Accessed: 14/05/25].

¹⁰³ The APIS. Acid Deposition. Available at: <http://www.apis.ac.uk/overview/pollutants/acid-deposition> [Accessed: 16/10/24].

North Kent Marshes

- 5.2.8 The qualifying features of the North Kent Marshes designations are listed in **Appendix B**. The SIP for the Greater Thames Complex (which includes the Medway Estuary and Marshes SPA, the Thames Estuary and Marshes SPA and the Swale SPA designations)¹⁰⁴ notes that these sites are vulnerable to air pollution, and in particular atmospheric nitrogen deposition. It notes that the Hen Harrier (*Circus cyaneus*), Little Tern (*Sterna albifrons*) and seabird assemblage are particularly vulnerable to changes in air quality.
- 5.2.9 Natural England provides Supplementary Advice on the Conservation Objectives for the Medway Estuary and Marshes SPA, the Thames Estuary and Marshes SPA and the Swale SPA. The Supplementary Advice for the features of each of these SPAs provides an air quality target because the structure and function of habitats which support the SPA features may be sensitive to changes in air quality. Exceeding critical values for air pollutants may result in changes to the chemical status of its habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of feeding or roosting habitats. The target for all the SPA qualifying habitats in terms of air quality is to 'maintain' as necessary the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for these features of the site on the Air Pollution Information System. This 'maintain' objective represents current baseline exceedances of critical loads. Any deterioration of air quality at these SPAs as a result of the MLP either alone or in combination with other plans and projects has the potential to have adverse impacts on their integrity.
- 5.2.10 For the corresponding Ramsar sites, no Conservation Advice is available. Natural England considers the Conservation Advice packages for the overlapping European Marine Site designations to be, in most cases, sufficient to support the management of the Ramsar interests¹⁰⁵.
- 5.2.11 APIS provides a searchable database and information on pollutants and their impacts on habitats and species¹⁰⁶. This information includes site relevant critical loads for the qualifying features of SAC and SPA designations and data on the sensitivities of each qualifying feature to air quality impacts. **Appendix E** summarises the critical levels for each of the North Kent Marshes SPA designations¹⁰⁷. The data presented in **Appendix E** only includes those qualifying features where APIS identifies there will be a "*potential negative impact on species due to impacts on the species' 'broad habitat' as a result of a change in air quality*". Where APIS identifies either no impact or a positive impact from a change in air quality upon qualifying features critical loads for these qualifying features have not been included in **Appendix E**.

¹⁰⁴ Natural England. 2014. SIP Greater Thames Complex.

¹⁰⁵ Natural England Designated Sites Viewer. Available at: <https://designatedsites.naturalengland.org.uk/> [Date Accessed: 28/04/25].

¹⁰⁶ Air Pollution Information Systems (2024) Site relevant critical loads, available at: <https://www.apis.ac.uk/> [Date Accessed: 14/05/25].

¹⁰⁷ Medway Estuary and Marshes SPA, Thames Estuary and Marshes SPA and the Swale SPA.

- 5.2.12 The North Kent Marshes Ramsar designations¹⁰⁸ qualify for avian species as set out for the SPAs in **Appendix B**. In addition, the Ramsar sites are also notified for a number of species of nationally scarce plants and wetland invertebrates (see **Appendix B**). Research undertaken on behalf of Natural England indicates that these species are associated with coastal habitats¹⁰⁹.
- 5.2.13 The Medway Estuary and Marshes Ramsar, the Thames Estuary and Marshes Ramsar and the Swale Ramsar comprise a complex of brackish, floodplain grazing marsh, ditches, saline lagoons and intertidal salt marsh and mudflat. The plant nationally scarce plant species are associated with coastal habitat types such as grazing marshes, together with their brackish ditches; upper salt marsh; sandy shingle; tidal mudflats or sandy mud; sea walls and disturbed soils near the sea. Key habitats for invertebrates include salt marshes and grazing marshes with brackish ditches or saline pools and reedbeds. For some species where suitable habitat exists inland these species are found for instance in reedbed and fen species such as the fly *Cephalops perspicuus* and the crane fly *Erioptera bivittata*¹¹⁰.
- 5.2.14 Whilst APIS does not provide critical loads and levels for the notified Ramsar features, it does provide information for qualifying habitats and features associated with the underpinning SSSI designations¹¹¹. The critical loads and levels for the non-avian features of the Ramsar sites, where they relate to the underpinning SSSI designation, are also set out in **Appendix E**.
- 5.2.15 At the North Kent Marshes, APIS baseline data indicates that on average across each designation nitrogen deposition levels are currently exceeding the lower nitrogen critical load range for all broad habitat classes but are below the upper range, with deposition to short vegetation approximately 11.5 kg N/ha/yr.

North Down Woodlands SAC

- 5.2.16 The SIP for the North Downs Woodlands SAC indicates that dry grasslands and scrublands on chalk or limestone (important orchid sites), Beech forests on neutral to rich soils and Yew-dominated woodland are all sensitive to air pollution.

¹⁰⁸ The Medway Estuary and Marshes Ramsar, the Thames Estuary and Marshes Ramsar and the Swale Ramsar

¹⁰⁹ LILEY, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

¹¹⁰ LILEY, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

¹¹¹ Medway Estuary and Marshes SSSI, Mucking Flats SSSI, South Thames Estuary and Marshes SSSI and the Swale SSSI.

5.2.17 England's Supplementary Advice¹¹² for the SAC indicates that a change in air quality may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it. The management target for the semi-natural dry grasslands and scrubland facies in terms of air quality is to "*maintain as necessary the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for these features of the site on the Air Pollution Information System*". With a target of 'restore' for Beech forest and Yew-dominated woodland features. This 'restore' objective represents current baseline exceedances of critical loads for these features. Any further deterioration therefore of air quality at the SAC as a result of the Local Plan either alone or in-combination with other plans and projects has the potential to have adverse impacts on the integrity of the SAC.

5.2.18 APIS baseline data for the North Downs Woodlands SAC indicates that both the upper and lower nitrogen critical loads are exceeded for Beech forests and Yew-dominated woods, with the lower range for semi-natural dry grasslands and scrubland facies on calcareous substrates also being exceeded. **Appendix E** summarises the critical levels for the North Downs Woodlands SAC.

5.3 Appropriate Assessment

5.3.1 Policies set out in the MLP (see **Table 5.1**) incorporate measures for sustainable transport and a requirement to encourage a modal shift and promote active transport options. These measures will have a positive impact upon air quality by discouraging the use of the private car and encouraging use of electric vehicles (EVs).

Table 5.1: MLP policies with mitigating effects on air quality LSEs

Policy number	Policy name	How does the policy mitigate air quality LSEs?
DM3	Air Quality	This policy requires that developments which have the potential to negatively impact on air quality will be expected to be accompanied by air pollution impact assessments and mitigation measures, in accordance with local air quality guidance.
S5	Securing Strong Green and Blue Infrastructure	This policy promotes opportunities to enhance the PRoW network, including national trails, long distance paths and the wider footpath network, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside, and other cross border links.
DM15	Monitoring and managing development	This policy requires development to demonstrate how vehicle trip generation would meet targets and also provide contributions towards transport mitigations to lower trip generations.
T20	Riverside Path	This policy sets requirements for waterfront development to integrate walking and cycling and provide opportunities for links to existing path networks.

¹¹² Natural England. (2019) North Downs Woodlands SAC. Supplementary Advice. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030225.pdf> [Accessed: 02/05/25].

Policy number	Policy name	How does the policy mitigate air quality LSEs?
DM16	Chatham Waters Line	This policy safeguards land for a new active travel corridor, linking the riverside around Chatham Maritime and Gillingham Riverside with Gillingham town centre.
DM17	Grain Branch	This policy safeguards land for new rail infrastructure, including a station, route alignment and buffer stop zone.
T24	User hierarchy and street design	This policy requires development to demonstrate consideration of a hierarchy which promotes among other items use in the first instance by pedestrians and cyclists.
T26	Accessibility Standards	This policy sets accessibility standards from key destinations for new development to encourage active travel and sustainable transport use.
DM18	Transport Assessments, Transport Statements and Travel Plans	This policy requires that development proposals that will generate a significant amount of movement will be supported by a Transport Assessment, Transport Statement and/or a commitment to provide a Travel Plan to promote active and sustainable transport.
DM20	Cycle parking and storage	This policy sets requirements for cycle parking and storage in new development.
SA1	Chatham Town Centre and Surrounds	This policy sets requirements for the provision of green-blue infrastructure and suitable walking and cycling links to improve accessibility.
SA3	Gillingham District Centre	This policy sets out requirements to connect walking and cycle routes to destinations including universities and with the proposed Greenway as a rich green resource for residents to improve health and connectivity to the waterfront and riverside walk.
SA4	River Waterfront	This policy aims to deliver greater accessibility along the waterfront.
SA5	Strood Town Centre and Surrounds	This policy supports proposals to deliver a transport interchange for sustainable and active forms of transport.
SA6	Chapter Farm / Land west of Strood	This policy aims to promote bus connections and pedestrian movements through design.
SA7	Capstone Valley	This policy aims to promote bus connections through design.
SA8	Hoo St Werburg and Chattenden	This policy promotes a range of active and sustainable transport links.
SA9	High Halstow	This policy aims to promote bus connections and pedestrian movements through design.
SA10	Lower Rainham	This policy aims to promote pedestrian connections through design.
SA14	Employment Sites	This policy requires development to assess the in-combination impact of industrial emissions (with traffic emissions) upon European sites specifically.

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- 5.3.1 Together these policies aim to protect air quality as a result of growth in the MLP and have been taken into consideration during the examination of adverse air quality impacts in this AA.
- 5.3.2 The Medway Local Transport Plan¹¹³ was adopted in 2011 and sets out the strategic policy for sustainable transport in Medway. Details of how the strategy will be implemented are contained in a series of Implementation Plans. A key priority includes the need to support a healthier community in Medway by promoting active lifestyles. Medway is currently working on a new LTP which is likely to contain similar ambitions for active travel. There are also a number of national initiatives to reduce vehicle related emissions, such as the Starmer's Labour Government commitment to restore the phase out of new petrol and diesel vehicles by 2030¹¹⁴.
- 5.3.3 Acting together, MLP policies, county and national led initiatives will promote sustainable transport options with reductions in reliance on the private car and associated reductions in traffic emissions.
- 5.3.4 At the time of writing air quality modelling was not available to fully allow an evaluation of air quality impacts associated with the MLP at the North Kent Marshes or the North Downs Woodlands SAC. It is therefore not possible to conclude whether the MLP will have an adverse impact upon the integrity of any European site. Further work in the form of air quality modelling is currently being scoped by the Council, in consultation with Natural England, and will inform a full AA of air quality impacts in due course. This work will include consideration of air quality emissions from industrial development allocations alongside transport related emissions.

¹¹³ Medway Council (2011) Medway Local Transport Plan 2011 – 2026.

¹¹⁴ Labour (2024) Driving a Growing Economy Labour's Plan for the Automotive Sector. Available at: https://labour.org.uk/wp-content/uploads/2023/10/WR-797_23-Automotive-strategy-v8.pdf [Date Accessed: 14/05/25].

6 Water Quality and Quantity Appropriate Assessment

6.1 Introduction

6.1.1 Development can reduce catchment permeability, and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to European sites or watercourses which connect to them and therefore a change in water levels. Water mains leakage and sewer infiltration may also affect water levels. In addition, supply to meet water demand associated with new development (supported by the MLP) also has the potential to affect water balances at hydrologically sensitive European sites which are connected to the Plan area.

6.1.2 The HRA screening process in **Chapter 4** concluded that a number of MLP policies (**Appendix C**) and all allocations when taken cumulatively (**Appendix D**) have the potential to result in LSEs at the Medway Estuary and Marshes SPA, the Medway Estuary and Marshes Ramsar, the Thames Estuary SPA, the Thames Estuary Ramsar, the Swale SPA and the Swale Ramsar due to changes in water quality and quantity. The screening process identified potential LSEs at the North Downs Woodlands in terms of changes in water quantity only.

6.1.3 Policies with potential to have recreational impacts and which are therefore screened into the HRA process include:

- Policy T7 – Houseboats
- Policy T9 - Self-Build and Custom Housebuilding
- Policy T10 - Gypsy, Traveller & Travelling Showpeople
- Policy S10 – Economic Strategy
- Policy S11 – Existing Employment Sites
- Policy S12 – New Employment Sites
- Policy S17 – Chatham Town Centre
- Policy S18 – Rochester District Centre
- Policy S19 – Gillingham District Centre
- Policy S20 – Strood District Centre
- Policy S21 – Rainham District Centre
- Policy S22 – Hoo Peninsula
- Policy S23 – Hempstead Valley District Centre
- Policy T32 – Supply of Recycled and Secondary Aggregates
- Policy T33 – Extraction of Land Won Materials
- Policy T36 – Location of Waste Management Facilities
- Policy T37 – Other Recovery
- Policy T38 – Landfill
- Policy T39 – Beneficial Use of Inert Waste by Permanent Deposit
- Policy T40 – Wastewater Treatment
- Policy S25 – Energy Supply
- Policy SA1 – Chatham Town Centre and Surrounds

- Policy SA2 – Heritage-led Sites
- Policy SA3 – Gillingham District Centre
- Policy SA4 – River Waterfront
- Policy SA5 – Strood Town Centre and Surrounds
- Policy SA6 – Chapter Farm / Land west of Strood
- Policy SA7 – Capstone Valley
- Policy SA8 – Hoo St Werburgh and Chattenden
- Policy SA9 – High Halstow
- Policy SA10 – Lower Rainham
- Policy SA11 – Rural Settlements
- Policy SA12 – Other Sites
- Policy SA13 – Frindsbury Peninsula Opportunity Area
- Policy SA14 – Employment Sites

6.1.4 This chapter therefore provides an AA which assesses more precisely the ecological impacts associated with changes in water quantity and quality due to MLP growth at each European site in view of its qualifying features and conservation objectives.

6.2 North Kent Marshes Appropriate Assessment

Baseline Information

- 6.2.1 The Medway Estuary forms a single tidal system with the Swale and feeds into the outer Thames Estuary between the Isle of Grain and Sheerness. A review of condition data for the Medway Estuary and Marshes SSSI, which underpins both the SPA and Ramsar designations, shows that algal blooms were detected at SSSI Unit 100. This unit is located at Bartlett Spit and Bishops Ooze in front of the Motney Hill sewage treatment works outfall. This unit is classed as being in an unfavourable – declining status. Algal blooms have the potential to reduce oxygen availability in sediments and impact upon the benthic invertebrate community upon which other species rely.
- 6.2.2 The Thames Estuary and Marshes SPA and Thames Estuary and Marshes Ramsar is located on the south side of the Thames Estuary. The marshes extend for approximately 15 km along the south side of the estuary and also include intertidal areas on the north side of the estuary. To the south of the river, much of the area is brackish grazing marsh, although some of this has been converted to arable use. The Thames Estuary and Marshes SPA and Thames Estuary and Marshes Ramsar designations are underpinned by two SSSIs, of which one, South Thames Estuary and Marshes SSSI, is potentially hydrologically linked to the Plan area. A review of favourable condition data associated with this SSSI indicates that no unit is in an unfavourable condition due to presence of algal blooms.
- 6.2.3 The Swale SPA and the Swale Ramsar designations are located on the south side of the outer part of the Thames Estuary. The Swale is an estuarine area that separates the Isle of Sheppey from the Kent mainland. To the west it adjoins the Medway Estuary. The Swale SPA and the Swale Ramsar designations are underpinned by one SSSI, The Swale SSSI. A review of favourable condition data associated with this SSSI indicates that no unit is in an unfavourable condition due to presence of algal blooms.

- 6.2.4 The SIP for the Thames Complex¹¹⁵ (which includes Medway Estuary and Marshes SPA, the Thames Estuary and Marshes SPA and the Swale SPA), does not identify water quality as a threat at these designated sites. However, research undertaken on behalf of Natural England to establish background information on the birds, invertebrates and habitats of the North Kent Marshes¹¹⁶ suggests that nutrient enrichment (in the form of nitrogen and phosphorus) is an issue in the waters around the Thames and Medway estuaries. This body of research indicates that the Environment Agency has recorded growth of green algae covering large areas of the intertidal mudflats in late summer noting: “*work undertaken by the Environment Agency has established that, at present, the intertidal mud and associated wintering birds are not being adversely affected by algal mats*”¹¹⁷. No water quality threats are identified at the Thames Estuary and Marshes SPA or the Swale SPA in the SIP.
- 6.2.5 The North Kent Marshes and the Plan area are all located within the Medway ALS area. Any increased demand for water supply from new growth set out in the MLP may affect the quantity of water available at these water dependent European Sites.
- 6.2.6 Growth set out in the MLP has the potential to increase nutrient loading and pollutants in the estuaries due to increased sewage effluent discharge and run off from new development. This may also act in-combination with other nutrient loadings from other land uses and development outside the Plan area.

Water Quality Appropriate Assessment

- 6.2.7 As noted in **Section 3.6**, urbanisation has the potential to reduce the quality of water entering a catchment through processes such as sedimentation, accidental spillage of chemicals and materials, disturbance of contaminated soils and operational surface water runoff. Water quality may also be reduced through effluent discharges at wastewater treatment works. This change in water quality can increase nutrient inputs into a catchment which can lead to algal blooms, reduce dissolved oxygen and increased turbidity. It can also result in the release of pollutants to a waterbody. This can affect the overall condition of the receiving waterbody and may have adverse effects at hydrologically sensitive and connected European sites and their qualifying features.
- 6.2.8 The Water Framework Directive (WFD) provides an indication of the health of the water environment and whether a water body is at good status or potential. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve good ecological status or potential, good chemical status or good groundwater status every single element assessed must be at good status or better. If one element is below its threshold for good status, then the whole water body's status is classed below good. Surface water bodies can be classed as high, good, moderate, poor or bad status.

¹¹⁵ Natural England (2014) Site Improvement Plan. Greater Thames Complex. Available at: [file:///Users/samanthacheater/Downloads/SIP141009FINALv1.0%20Greater%20Thames%20Complex%20\(1\).pdf](file:///Users/samanthacheater/Downloads/SIP141009FINALv1.0%20Greater%20Thames%20Complex%20(1).pdf) [Date Accessed: 02/04/25].

¹¹⁶ LILEY, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

¹¹⁷ Natural England Designated Site Viewer. Available at: <https://designatedsites.naturalengland.org.uk/SiteFeatureCondition.aspx?SiteCode=S1000244&SiteName=Medway%20Estuary%20and%20Marshes%20SSSI>. [Date Accessed: 02/04/25].

- 6.2.9 The WFD sets out areas which require special protection. These include areas designated for “*the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in their protection including relevant Natura 2000 sites designated under Directive 92/43/EEC (the Habitats Directive) and Directive 79/409/EEC (the Birds Directive)*”¹¹⁸.
- 6.2.10 A review of Environment Agency monitoring data¹¹⁹ indicated that in 2019 the Medway Management Catchment, which comprises 59 waterbodies, contained four surface waterbodies which were classified as being of ‘bad’ ecological status, nine being ‘poor’, 44 moderate and only two ‘good’. A total of 58 waterbodies failed chemical status testing.
- 6.2.11 A high-level framework is in place across the country to protect and enhance the benefits provided by the water environment (as set out in **Section 3.6**). To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning and provides strategic level policy guidance in relation to baseline classification of water bodies, statutory objectives for protected areas and water bodies, and a summary of measures to achieve statutory protection. The Thames RMBP, as outlined at **Section 3.6**, sets out a number of water management issues affecting rivers within this river basin and measures to address these as follows¹²⁰:
- Measures required to address physical modifications
 - Measures required to manage pollution from wastewater, from towns, cities and transport
 - Measures required to manage pollution from metal mines
 - Measures required for pollution from rural areas
 - Measures required to manage changes to natural flow and levels of water
 - Measures required for peatland restoration
 - Measures required to manage invasive non-native species
- 6.2.12 The Thames RMBP was supported by an HRA which was carried out by the Environment Agency¹²¹. It determined that, at the strategic plan level, the range of potential mitigation options available allow a conclusion that the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects. It notes that HRA requirements will continue to apply for lower tier plan and project level assessments.

¹¹⁸ Official Journal of the European Communities (2000) Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy. Available at: <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3055> [Date Accessed: 02/04/25].

¹¹⁹ Environment Agency (2023) Water Quality Monitoring Data Archive. Available at: <https://environment.data.gov.uk/dataset/2499766e-b15a-4f85-a758-5702de693723> [Date Accessed: 02/04/25].

¹²⁰ Environment Agency (2022) Thames River Basin Management Plan. Available at: <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022> [Date Accessed: 02/04/25].

¹²¹ Environment Agency (2022) River basin management plan for the Thames River Basin District Habitats Regulations Assessment. Available at: https://assets.publishing.service.gov.uk/media/635248048fa8f554cca7b226/Thames_river_basin_management_plan_2022_HRA.pdf [Date Accessed: 02/04/25].

- 6.2.13 Southern Water is the primary provider for wastewater disposal within Medway and has prepared a Drainage and Wastewater Management Plan (DWMP) across its catchments, including Medway. DWMPs are long term plans that will provide an opportunity to improve water quality and drainage systems and will address pollution and flooding for the benefit of communities and the environment. These long-term plans take into account projected growth over the MLP period.
- 6.2.14 Wastewater is treated at eight locations across Medway. Facilities at Whitewall Creek also serve part of Gravesham, and at Motney Hill, parts of the Swale Borough. Southern Water has undertaken a risk assessment in relation to nutrient neutrality for their DWMP¹²². This identified wastewater catchments where there is a need or risk of needing to secure nutrient neutrality for growth in order to protect European sites. The North Kent Marshes are amongst the designated sites identified in this review as being potentially vulnerable to water quality threats. The assessment for the Medway River Basin catchment indicated that nutrient neutrality is a risk at four wastewater systems including Motney Hill in Medway¹²³.
- 6.2.15 Effluent discharge to the water is also controlled through an environmental permitting system which is administered by the EA. The level of discharge is determined by the EA through the issue of Environmental Permits (EPs). These ensure the receiving watercourse is not prevented from meeting its environmental objectives under the WFD, with specific regard to the physico-chemical status element of the WFD classification.
- 6.2.16 The construction and operation of allocated sites set out in the MLP has the potential to result in the discharge of contaminated surface water run-off. At a site level, construction related surface water run-off must be managed at all development sites through the implementation of sensitive construction techniques and a Construction Environmental Management Plan (CEMP). Policy DM2 – Contaminated Land – provides provisions for the careful management and remediation of contaminated land at brownfield sites, which will include provisions to mitigate contaminated water run-off during construction.

¹²² Southern Water. 2021. Medway Wastewater BRAVA summary. Available at: <https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/medway-river-basin-catchment/#> [Date Accessed: 02/04/25].

¹²³ Southern Water. 2021. Medway Wastewater BRAVA summary. Available at: <https://www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/medway-river-basin-catchment/#> [Date Accessed: 02/04/25].

- 6.2.17 A Sustainable Urban Drainage Systems (SuDS) should be implemented for all developments to mitigate any adverse effects arising from potentially contaminated surface water run-off during site operation. The design of a SuDS strategy should take into consideration best practice such as CIRIA SuDS Manual¹²⁴. This measure is secured through Policy DM1– Flood and Water Management. This policy requires new development to *“have regard to the actions and objectives of appropriate RBMP (in Medway, this is the Thames River Basin District) in striving to protect and improve the quality of water bodies in and adjacent to the district. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary”*. This policy requires new development to *“ensure that adequate wastewater infrastructure is available in tandem with the development, which are also resilient to the impacts of climate change”*. The policy also promotes the use of SuDS to address run-off rates, which also have water quality benefits. This policy requires that all foul water sewerage be connected to the main public sewage network, and in the absence of a connection to the main sewage network, evidence provided indicating why connecting to the mains sewer system is not feasible for this development.
- 6.2.18 In addition, Policy S2 - Conservation and Enhancement of the Natural Environment - will apply to all development and any windfall which comes forward through the MLP. This policy includes requirements for development to comply with the Habitat Regulations Assessment and ensures development does not contribute to any adverse impacts on the integrity of any European site either alone or in-combination.
- 6.2.19 Estuaries are dynamic systems which are regularly flooded from both fluvial and tidal sources. This means they are regularly flushed with nutrient rich waters, with sediment input being naturally high in the Medway Estuary. A high sediment loading is likely to limit light penetration and availability to photosynthetic organisms¹²⁵. This will limit growth and mean that sediments are likely to remain well oxidised¹²⁶. The high sediment loading is likely to be the limiting factor in algal growth, rather than nutrient availability.
- 6.2.20 Taking into consideration the dynamic nature of the estuarine systems, the high level protective framework for water quality, the permitting system administered by the Environment Agency and policy requirements set out in the MLP to protect water quality, it is considered unlikely there will be any increased nutrient loading or pollutants within the estuaries and the benthic invertebrate community upon which the bird species rely will be unaffected. As a result, there will be no adverse impact on site integrity at any European site as a result of the MLP alone or in-combination.

Water Quantity Appropriate Assessment

- 6.2.21 The North Kent Marshes and the Plan area are all located within the Medway ALS area. Any increased demand for water supply from new growth set out in the MLP may affect the quantity of water available at these water dependent European Sites.

¹²⁴ Ciria (2015) The SuDS Manual.

¹²⁵ C R Scott+, KIL Hemingway, M Elliot, V N de Jonge, J S Pentthick, S Malcolm and M Wilkinson. 1999. Impact of Nutrients in Estuaries. Phase 2 Summary Report.

¹²⁶ Swale Borough Council. January 2021. Habitats Regulations Assessment Local Plan. AECOM.

- 6.2.22 Urban development can reduce catchment permeability, and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to European sites or watercourses which connect to them and therefore a change in water levels. Water mains leakage and sewer infiltration may also affect water levels. In addition, supply to meet water demand associated with new development (residential and employment development supported by the MLP) also has the potential to affect water balances at hydrologically sensitive European sites which are connected to the Plan area.
- 6.2.23 As noted in **Section 3.6** two water companies operate within Medway, with Southern Water providing the supply to the majority of the Plan area, with South East Water supplying the Haling area. For the purposes of water resource planning, the Southern Water supply area is divided into Water Resource Zones (WRZs). These WRZs have been amalgamated into larger sub-regional supply areas. The MLP area is served from the Kent Medway East and Kent Medway West areas. The Kent Medway East supply area is supplied 100% from groundwater, whilst the Kent Medway West area is supplied 56% from river and reservoir (Bewl Water) and 44% from groundwater¹²⁷. As set out in **Section 3.6**, Medway is in an area of water stress as identified by the Environment Agency.
- 6.2.24 Southern Water's Final Draft WRMP24¹²⁸ covers the period from 2020-2075. Southern Water's draft WRMP24 proposes a range of short-term interventions including leakage reductions, significant demand management and new resource developments, such as smart network technology, water quality improvements, and a water recycling plant near the River Medway. The short-term interventions provide alternative water supplies to industrial water users and drought management schemes. The need for these interventions is due to a combination of changes to abstraction licences, increasing demand, the effects of climate change, and expected further reductions in the water available for use from existing sources as a result of licence changes to protect and enhance the environment. The Southern Water WRMP was subject to an HRA¹²⁹ which concluded no adverse impact on site integrity (see **Appendix A**).

¹²⁷ Southern Water (2024) Securing a resilient future for water in the South East A consultation on our draft Water Resources Management Plan. September 11 to December 2024. Available at: <https://www.southernwater.co.uk/about-us/our-plans/water-resources-management-plan/> [Date Accessed: 02/04/25].

¹²⁸ Southern Water. Final Draft Water Resources Management Plan May 2025. Technical Report. Available at: <https://www.southernwater.co.uk/media/2p5o0k0c/technical-report.pdf> [Date Accessed: 16/06/25].

¹²⁹ Southern Water (2022). Final Water Resources Management Plan 2024 ANNEX 18 – HABITATS REGULATIONS ASSESSMENT OF THE WATER RESOURCE MANAGEMENT PLAN 2024. Available at: <https://www.southernwater.co.uk/media/b45jc3w1/annex-18-habitat-regulations-assessment-report.pdf> [Date Accessed: 16/06/25]

- 6.2.25 South East Water has also prepared a WRMP which sets out how South East Water plan to secure water supplies from 2025 – 2075¹³⁰. The long-term forecast shows there is insufficient water available to meet demand, and therefore there is a risk of not meeting supply. Therefore, the WRMP sets out a range of demand management measures and new water supply options that could meet that shortfall in water availability. The South East Water WRMP was subject to an HRA¹³¹ which concluded that all measures and options, with the exception of one which will not be taken forward, would have no adverse impact on site integrity (see **Appendix A**).
- 6.2.26 The Water Industry Act 1991 as amended by the Water Act 2003 made it a statutory requirement for water companies to produce and maintain a Drought Plan every 5 years. A Drought Plan (or Dry Weather Plan) sets out a framework for a water company to follow at times of drought and dry weather to maintain water supply and links strategically with the WRMPs. Southern Water has a Drought Plan in place to cover the five-year period from 2019¹³² and South East Water's Drought Plan covers the period from 2022 to 2027¹³³. A number of drought / dry weather scenarios are tested in these plans under different climatic conditions to show that supply can be maintained. These plans are aligned with the WRMPs.
- 6.2.27 Together the Government, the Environment Agency and the water companies are responsible for preparing plans and strategies and implementing a regulatory framework to ensure there is enough water for the future needs of both people and the environment and managing the treatment of wastewater. This is undertaken through a catchment-based approach and provides protection for European sties and ensures compliance with the WFD¹³⁴. As set out in **Section 3.6**, abstractions for water supply are managed by the Environment Agency through licences issued in line with their CAMS process.
- 6.2.28 Policy DM1 – Flood and Water Management - will only permit new development within groundwater Source Protection Zones (SPZs) and Principal Aquifers where it has no adverse impact on the quality of the groundwater resource, and it does not put at risk the ability to maintain a public water supply. The purpose of this policy is to protect and conserve water supply in the area. Policy DM1 also promotes water efficiency measures in new development such as the use of grey water and rainwater recycling and low water use sanitary equipment.
- 6.2.29 In preparing the MLP, the Council has been in ongoing liaison with the water companies, to ensure that appropriate and sufficient supply can be made for infrastructure, and that the emerging growth proposals can be supported. This forms part of the Duty to Cooperate on strategic cross border issues and will inform the Infrastructure Delivery Plan (Policy S24) which forms a critical component of the MLP evidence base.

¹³⁰ South East Water (October 2024) Water Resources Management Plan 2025 to 2075.

¹³¹ South East Water. 2024. WRMP24 Habitats Regulations assessment report. Technical report. Available at: https://cdn.southeastwater.co.uk/SewHousehold/Documents/WRMP2023/Final/SEW_WRMP24_HRA_Report.pdf [Date Accessed: 16/06/25]

¹³² Southern Water (July 2019) Drought Plan 2019. Technical Report.

¹³³ South East Water (May 2022) The Drought Plan.

¹³⁴ https://environment.ec.europa.eu/topics/water/water-framework-directive_en.

- 6.2.30 In conclusion, water supply issues will be addressed through the higher-level water planning framework and licencing process (RBMP, WRMP, Drought Plans and CAMS). MLP policies to improve water efficiency and ensure adequate water supply for growth will also ensure water supplies at the North Kent Marshes can be met to meet the requirements of European sites. It can therefore be concluded that there will be no adverse impacts on the integrity of the North Kent Marshes, either alone or in-combination, due to a change in water quantity as a result of the MLP.

6.3 North Downs Woodlands SAC Appropriate Assessment

Baseline Information

- 6.3.1 The North Downs Woodlands SAC consists of mature Beech (*Fagus sylvatica*) forests and Yew (*Taxus baccata*) woods on steep slopes. These stands lie within a mosaic of scrub, other woodland types and areas of unimproved grassland on thin chalk soils¹³⁵. Natural England's Supplementary Advice for the SAC indicates that in relation to the Beech forest and Yew-dominated woodland features, changes in source, depth, duration, frequency, magnitude and timing of water supply can have significant implications for the assemblage of characteristic plants and animals present. It is therefore important that natural hydrological processes are maintained. Both the SAC and the Plan area are located within the Medway ALS area. Any increased demand for water supply from new growth set out in the MLP may affect the quantity of water available at this water dependent European site.

Water Quantity Appropriate Assessment

- 6.3.2 The North Downs Woodlands SAC and the Plan area are all located within the Medway ALS area. Any increased demand for water supply from new growth set out in the MLP may affect the quantity of water available at this water dependent site.
- 6.3.3 As set out in **Section 6.2**, water supply issues will be addressed through the higher-level water planning framework and licencing process (RBMP, WRMP, Drought Plans and CAMS). MLP policies to improve water efficiency and ensure adequate water supply for growth will also ensure water supplies at the North Downs Woodlands SAC can be met to meet its requirements. It can therefore be concluded that there will be no adverse impacts on the integrity of the North Downs Woodlands SAC, either alone or in-combination, due to a change in water quantity as a result of the MLP.

¹³⁵ Natural England (2014) North Downs Woodlands SAC Citation.

7 Recreational Pressure Appropriate Assessment

7.1 Introduction

7.1.1 The following section of the AA focuses on assessing the ecological impacts of increased recreational pressures from the MLP upon the qualifying features of the following European sites which were screened into the HRA process (**Chapter 4**):

- Medway Estuary and Marshes SPA
- Medway Estuary and Marshes Ramsar
- Thames Estuary and Marshes SPA
- Thames Estuary and Marshes Ramsar
- The Swale SPA
- The Swale Ramsar
- North Downs Woodlands SAC

7.1.2 Policies with the potential to have LSE recreational impacts and therefore which will be assessed in the recreational pressure AA include the following:

- Spatial Development Strategy
- Policy T7 – Houseboats
- Policy T9 - Self-Build and Custom Housebuilding
- Policy T10 - Gypsy, Traveller & Travelling Showpeople
- Policy S20 – Strood District Council
- Policy T20 – Riverside Path
- Policy DM16 – Chatham Waters Line
- Policy SA1 – Chatham Town Centre and Surrounds
- Policy SA2 – Heritage-led Sites
- Policy SA3 – Gillingham District Centre
- Policy SA4 – River Waterfront
- Policy SA5 – Strood Town Centre and Surrounds
- Policy SA6 – Chapter Farm / Land west of Strood
- Policy SA7 – Capstone Valley
- Policy SA8 – Hoo St Werburgh and Chattenden
- Policy SA9 – High Halstow
- Policy SA10 – Lower Rainham
- Policy SA11 – Rural Settlements
- Policy SA12 – Other Sites
- Policy SA13 – Frindsbury Peninsula Opportunity Area

7.1.3 Development, and specifically housing growth, has the potential to increase recreational pressure at European sites. These pressures can cause the loss of, or damage to, the features for which a European site is designated¹³⁶. Recreational activities including land and water-based pursuits can lead to impacts such as:

- Habitat loss
- Habitat fragmentation
- Habitat damage through trampling and erosion
- Disturbance to plants and animals from increased numbers of people undertaking a range of different open air recreational activities
- Disturbance to plants and animals from dogs
- Pollution and contamination caused by dog fouling (eutrophication)

7.2 North Kent Marshes Appropriate Assessment

Baseline information

7.2.1 Given the contiguous nature of the Medway Estuary and Marshes SPA, Medway Estuary and Marshes Ramsar, the Thames Estuary and Marshes SPA and the Thames Estuary and Marshes Ramsar, this section of the report considers these designations collectively. Whilst the screening assessment (**Chapter 4**) indicates that there are no residential allocations located within 6km of the Swale SPA and Ramsar, given these designations are a key component of the wetland, marsh and intertidal habitat system along the North Kent Marshes, these designations are also considered within this element of the AA.

7.2.2 The SIP for the Greater Thames Complex¹³⁷ (which includes the Medway Estuary and Marshes SPA, the Thames Estuary and Marshes SPA and the Swale SPA), and extensive research carried out in north Kent^{138,139} indicates that these European sites are vulnerable to recreational disturbance. In particular, it has been shown that there have been marked declines in the numbers of birds using the SPA and Ramsar designations at areas where public access for recreational purposes is greatest. Recent bird disturbance surveys were undertaken in 2021/2022¹⁴⁰ to collect current data on abundance, distribution, disturbance events, and responses of waterbirds within a defined study area using the same survey locations as previous surveys. These surveys highlighted the link between dogs off the lead and bird disturbance and identified the key focal areas along the coast for access and recreational activity, Riverside Country Park and Grain Coastal Park.

7.2.3 An increase in development from the MLP has the potential to increase recreational pressure on these designated sites and undermine its ability to achieve relevant conservation objectives.

¹³⁶ Natural England. Public Access and Disturbance Theme Plan A strategic approach to identifying and addressing significant effects on the features of Natura 2000 sites.

¹³⁷ Natural England (2014) SIP Greater Thames Complex.

¹³⁸ Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

¹³⁹ LILEY, D. (2011) What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

¹⁴⁰ Kent Wildlife Trust Consultancy Services (2022) North Kent SAMMS – Bird Disturbance Surveys Winter 2021/22.

Appropriate Assessment

- 7.2.4 As set out in **Section 3.7**, research undertaken in 2011 and 2012 established a 6km Zol, within which new residential development is considered to have the potential to contribute to in-combination recreational disturbance impacts with other plans and projects.
- 7.2.5 **Figure 7.1** shows those residential site allocations which are located within the 6km Zol. Development of these allocations therefore has the potential to result in an in-combination adverse impact on the integrity of the North Kent Marshes.
- 7.2.6 The updated five-year Bird Wise strategy was published in December 2024¹⁴¹ and took into consideration new evidence on bird disturbance impacts from recreational activities¹⁴², the efficacy and costings for SAMMS projects and the proposed level of planned growth within the Zol over the strategy period. This set out mitigation required to address in-combination recreational pressure from future growth in north Kent¹⁴³ upon the North Kent Marshes to ensure no adverse impact on their site integrity and measures to monitor the efficacy of this mitigation and will be subject to regular review. These measures focus on dog walkers, water based and airborne activities, walking and nature watching, education and digital engagement alongside monitoring projects.
- 7.2.7 All residential development within 6km of the North Kent Marshes will be required to pay a developer contribution towards the Bird Wise scheme. This scheme will see the implementation of mitigation and monitoring measures to ensure no adverse impact on the integrity of the designated sites due to new development from the MLP in-combination with other plans and projects which deliver growth in the area of impact (6km).
- 7.2.8 The requirement for new development to contribute towards Bird Wise is secured through the MLP at Policy S3: North Kent Estuary and Marshes Designated Sites. This policy states: *“New residential development within a 6km Zone of Influence from the North Kent Estuary and Marshes designated sites will need to make a defined tariff contribution to a strategic package of measures agreed by the North Kent SAMMS, ‘Bird Wise’ Board, or undertake their own Habitats Regulation Assessment with bespoke mitigation which must be agreed with Medway Council and Natural England. Bird Wise will be reviewed on a regular basis to reflect proposed growth from all LPAs within the Zone of Influence”*.
- 7.2.9 Policy S3 also notes that new residential development for larger schemes outside the 6km Zol may, on a case-by-case basis, also need to secure appropriate mitigation and avoidance measures to offset any potential adverse effects arising from increased recreational pressure on the above listed designations.
- 7.2.10 Policy S3 will apply to all new residential development including residential moorings and houseboats (as set out under Policy T7 – Houseboats).

¹⁴¹ North Kent Bird Wise (2024) Mitigation Strategy 2024 – 2029.

¹⁴² Kent Wildlife Trust Consultancy Service (2022) North Kent SAMMS – Bird Disturbance Surveys Winter 2021/22.

¹⁴³ Local Planning Authority areas included: Canterbury, Dartford, Gravesham, Medway and Swale.

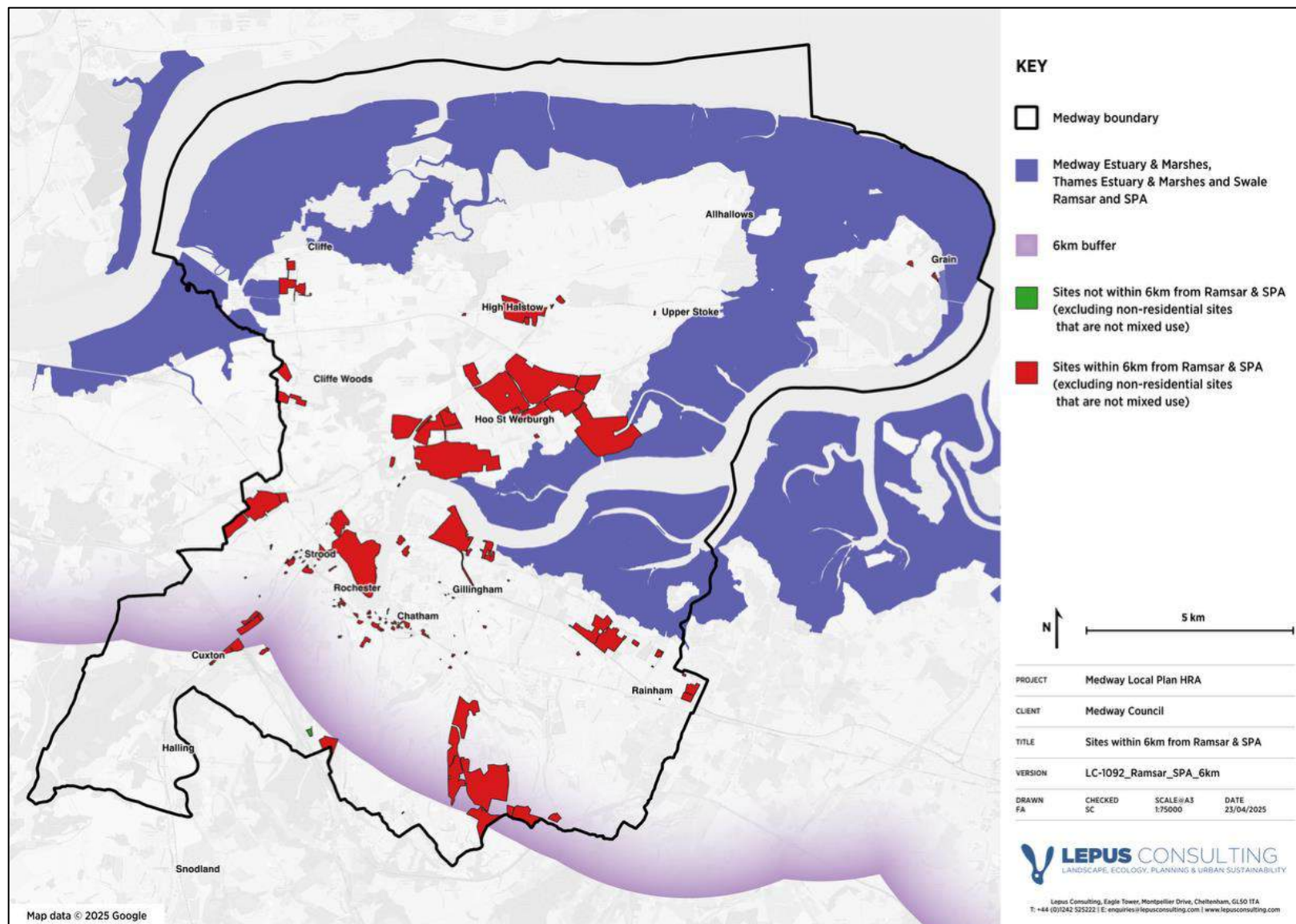


Figure 7.1: Location of site allocations within the Bird Wise 6km ZOI

- 7.2.11 A number of residential allocated sites on the Hoo Peninsula and also along the southern coast of the Medway Estuary (at Chatham Docks at St Mary's Island moving to the east towards Rainham), are located within close proximity, and in some cases adjacent, to the North Kent Marshes (see **Figure 7.2**).
- 7.2.12 Natural England's SSSI IRZs, described in **Section 3.3**, define areas around a SSSI which reflect the particular sensitivities of the features for which a SSSI is notified and indicate the types of development proposal which could potentially have adverse impacts upon it. They also cover the interest features and sensitivities of European sites, which are underpinned by SSSI designations. A review of Natural England's SSSI IRZs for residential allocations which are within close proximity to the North Kent Marshes, indicates that a number of these will trigger requirements to consult with Natural England. The outputs of this review and SSSI IRZ thresholds are provided in **Appendix D** and summarised in **Table 7.1**.
- 7.2.13 Whilst it is considered that Bird Wise will provide appropriate mitigation for recreational impacts from proposed MLP growth (in-combination) across the majority of the Plan area, it may not completely address recreational impacts associated with allocations in close proximity to the North Kent Marshes (i.e. development listed in **Table 7.1** and illustrated in **Figure 7.2**).

Table 7.1: *Allocations which are located within the North Kent Marshes SSSI IRZ and which trigger consultation with Natural England due to the scale of development proposed*

Allocation	Number of residential dwellings	SSSI IRZ trigger
HHH12	1801	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes.
HHH25	80	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes.
HHH24	85	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes.
HHH33	330	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes.
HHH5	50	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has 50 proposed new net homes.
HHH8	8	A small part of the site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 50 proposed new net homes.
HHH22 & HHH31	1700	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes.
GN6	400	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes.
GN3	176	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 50 proposed new net homes.
GN15	1100	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes.

Allocation	Number of residential dwellings	SSSI IRZ trigger
HHH26	760	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes.
HHH29	55	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes.
RN17	32	The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As the development is in a rural setting, and has over 10 proposed new net homes, it triggers consultation with Natural England.
RN23	75	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 50 proposed new net homes. Therefore, the site triggers consultation with Natural England.
RN9	800	The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As the development is in a rural setting, and has over 10 proposed new net homes, it triggers consultation with Natural England
AS25	34	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As it is in a rural location, bordered on three sides by agricultural land, and has over 10 proposed new net homes, consultation with Natural England is triggered.
SR7	44	The site sits partly within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As it is in a rural location and there are over 10 proposed new net homes, the site triggers consultation with Natural England.
AS11	10	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As it is in a rural location and there are 10 proposed new net homes, the site triggers consultation with Natural England.
SR51	250	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As there are over 10 proposed new net homes, the site triggers consultation with Natural England
AS6	40	The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As the site has over 10 proposed new net homes, the site triggers consultation with Natural England.

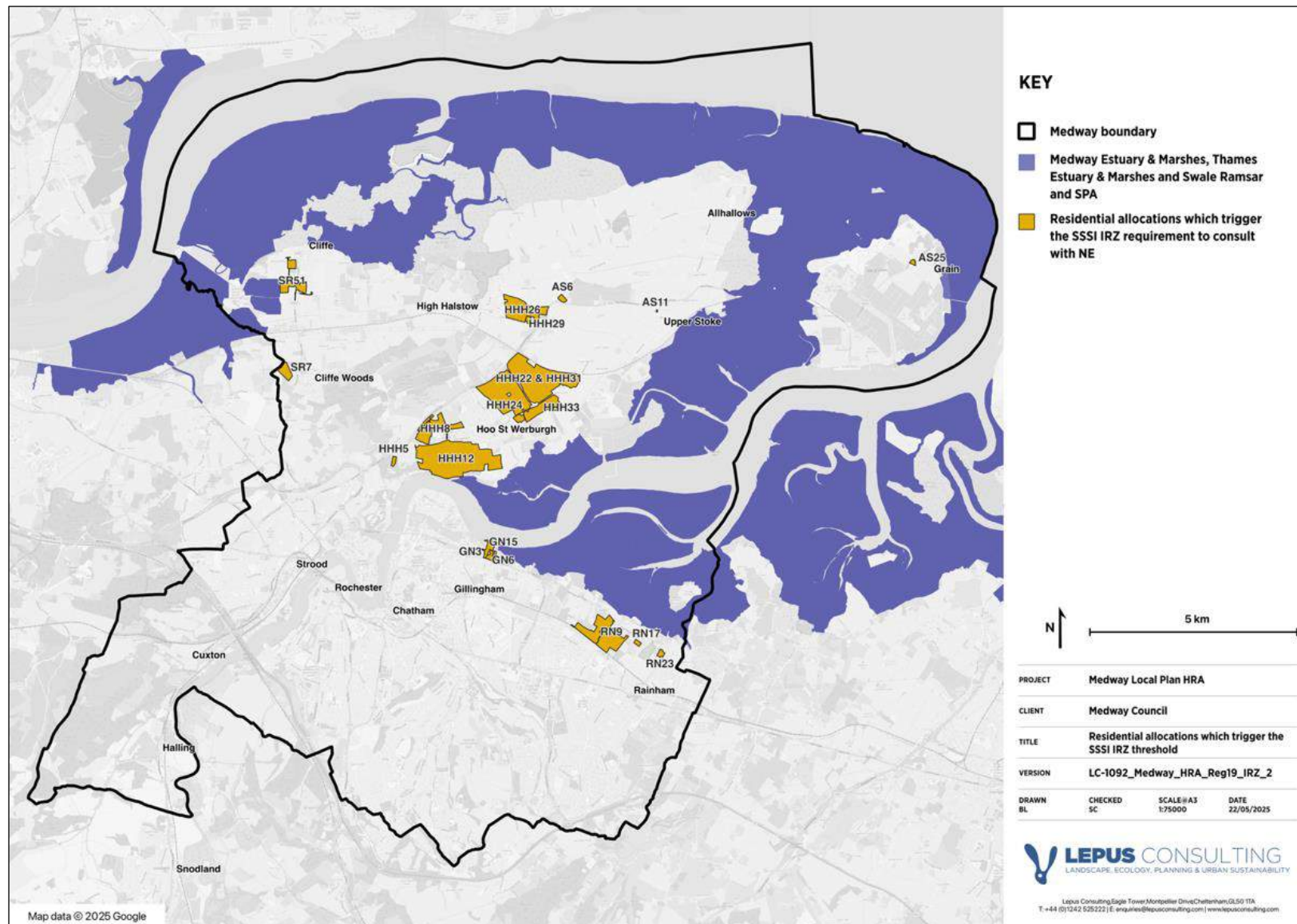


Figure 7.2: Residential allocations which trigger SSSI IRZ thresholds

- 7.2.14 A Cumulative Ecological Impact Assessment (CEcIA) was undertaken on behalf of Medway Council to assess, at a broad scale, the potential ecological impacts of development on the Hoo Peninsula as proposed within the MLP¹⁴⁴. The CEcIA notes that access to the Hoo Peninsula's shoreline is limited in many areas. Research undertaken on behalf of Natural England indicates that recreational disturbance is focused on key car parking locations which include Otterham Creek, the Riverside Country Park, with access also available along the harbour front to Rushenden on the southern shore¹⁴⁵. On the north shore of the estuary access and parking is available at Lower Upnor and Hoo St Werburgh (linked to the coast via the Saxon Shore Way and the King Charles III Coastal Path around Hoo flats and marshes) and Grain. As noted in **paragraph 7.2.7**, the Bird Wise scheme is already in place to deal with disturbance impacts along these designated shoreline habitats.
- 7.2.15 The CEcIA notes that breeding waders such as lapwing (*Vanellus vanellus*)¹⁴⁶ and redshank (*Tringa totanus*), which ground nest in open landscapes of wet grassland away from the immediate coastline, may be vulnerable to impacts associated with the scale and proximity of development. This is because a number of areas of designated habitat are crossed by the PRow network (see **Figure 7.2**). An increase in use of this network would increase disturbance of ground nesting birds with potential adverse impacts on the integrity of the designated sites. The CEcIA highlights a number of areas which may be particularly sensitive to these impacts. These include Higham Marsh, Cliffe Pools, Rye Street Common, Northward Hill and Allhallows (See **Figure 7.3**). Lapwing form part of the Medway Estuary and Marshes SPA waterbird and breeding bird assemblage (**Appendix B**) and part of the Thames Estuary and Marshes SPA waterbird assemblage. Redshank form part of the waterbird assemblage for both sites (**Appendix B**).

¹⁴⁴ Ricardo Energy and Environment. 2021. Hoo Peninsula CEcIA.

¹⁴⁵ LILEY, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

¹⁴⁶ All bird species nomenclature follows the Royal Society for the Protection of Birds (RSPB) style.

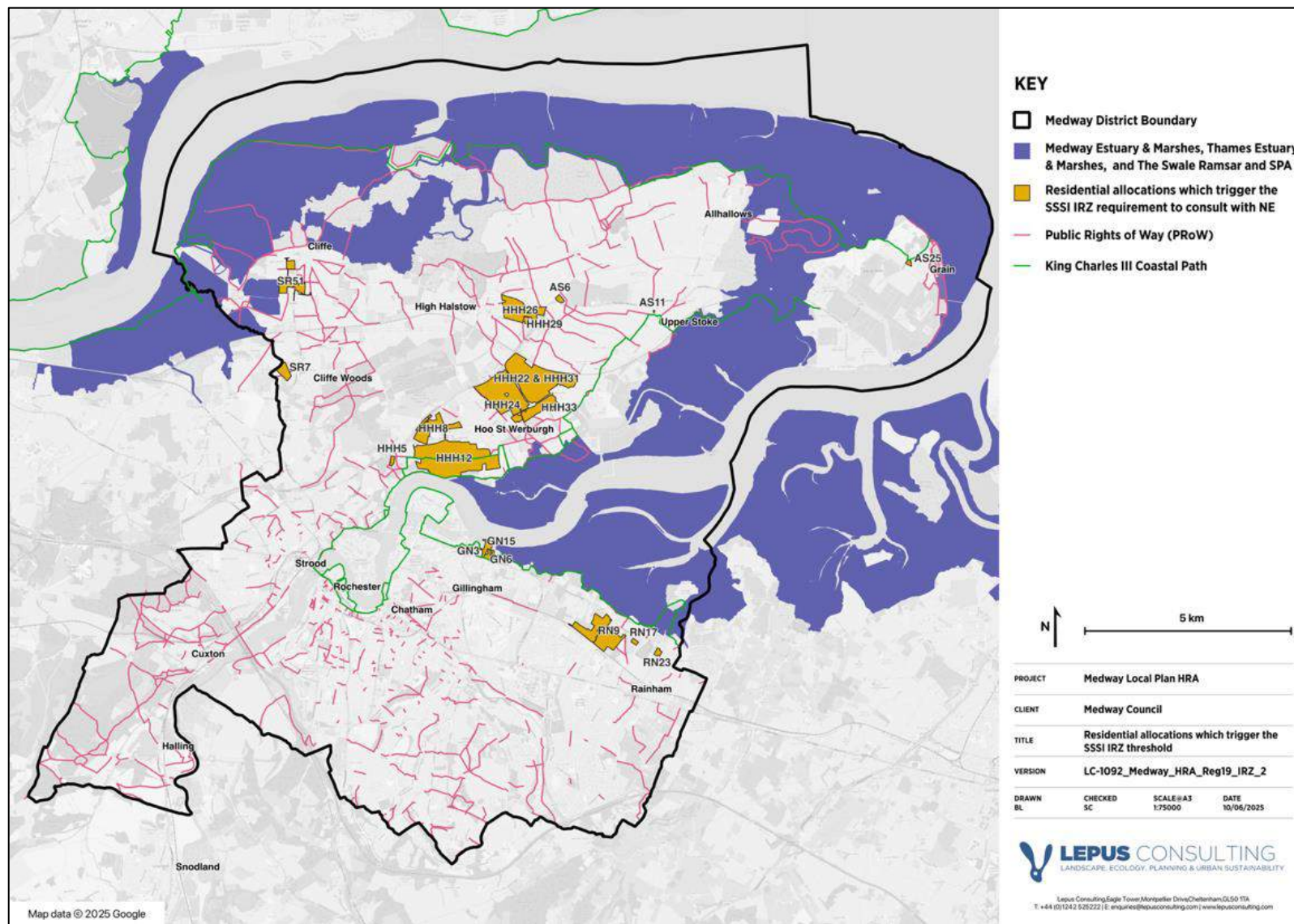


Figure 7.3: PRoW and site allocations on the Hoo Peninsula

- 7.2.16 Given the scale of development on the Hoo Peninsula specifically and the proximity of allocations to the North Kent Marshes (see **Figure 7.2**), the CEclA recommends a package of measures, in addition to the Bird Wise scheme, to address recreational impacts.
- 7.2.17 In the first instance through the growth strategy for the Plan area, the Council has sought to avoid sensitive sites where possible, restricting allocations to land which is in either intensive arable / horticultural land uses, or which has been previously developed.
- 7.2.18 Policy S2 sets out details regarding the Hoo Peninsula Strategic Environmental Programme. This policy notes that the *“Council will work in partnership with Natural England, environmental organisations and communities to establish and implement a strategic environmental programme on the Hoo Peninsula. This will provide a strategic approach to protecting designated sites, specifically Chattenden Woods and Lodge Hill SSSI, and the Medway Estuary and Marshes SPA, Ramsar site and SSSI. A coordinated programme of evidence-based measures will include land management and habitat restoration and creation, buffers to sensitive sites, securing the landscape, a nature-based approach to flood and water management, education and wardening, and provision of recreational resources away from sensitive locations. Developers of sites on the Hoo Peninsula will be required to contribute to the implementation of the strategic environmental programme, proportionate to the scale and nature of the development, and its proximity to sensitive sites”*.
- 7.2.19 In addition, this requirement is covered in the site allocation policy for Hoo St Werburgh and Chattenden (Policy SA8) which notes that *“a strategic environmental management plan will be prepared and approved by the Council and Natural England to provide the basis for an integrated programme of measures to safeguard and strengthen the natural environment around Hoo and Chattenden, particularly the SPA, Ramsar sites and SSSIs. Development will contribute towards the implementation of the strategic programme to provide for sustainable development”*.
- 7.2.20 The Hoo Peninsula Strategic Environmental Programme is comprised of a number of components as detailed below:
- Cockham Community Parkland
 - Hoo Wetlands Reserve
 - Deangate Community Parkland
 - Green Infrastructure (GI) improvements and projects, which could include Homes England’s proposed Environmental Framework plan for Chattenden Woods and Lodge Hill.
- 7.2.21 The final details of the Hoo Peninsula Strategic Environmental Programme are currently being worked up however the following information outlines existing work that has been prepared to date.

7.2.22 The proposed site for the Cockham Community Parkland forms part of Cockham Farm. A series of fields currently in use for crop growing will be re-purposed to create the parkland. The fields lie to the south of Hoo St Werburgh and the east of Chattenden. The eastern edge of the park will meet Vicarage Lane. Saxon Shore Way (Upper) runs along part of the northern site boundary. Planning permission for the Parkland was granted in 2021. Environmental enhancements at the parkland include the creation of a place for community recreation, combined with extensive habitat creation including the enhancement of Cockham Wood SSSI as follows (and illustrated in **Figure 7.4**):

- Create a substantial public open space of at least 50 hectares.
- Showcase the Peninsula's landscapes.
- Celebrate nature through nurturing existing habitats and creating new ones.
- Provide users with an opportunity to further enjoy views across the River Medway.
- Educate visitors about the importance of the estuary and need to protect it.
- Provide appropriate visitor facilities including extensive space for passive recreation including space for picnics, play and woodland trails.
- Create a network of safe and attractive routes for dog walkers, walkers and cyclists.
- Design in flexibility for additional visitor facilities to be added in the future such as a visitor centre.



Figure 7.4: Location of Cockham Community Parkland

7.2.23 The Hoo Wetlands Reserve received planning approval in March 2023. The site comprises agricultural land with some wooded tree belt boundaries, with areas of grazing marshland. The site is just under 16 hectares and is located on the north shore of the River Medway between Hoo St Werburgh found to the west and Kingsnorth Power Station to the east (see **Figure 7.5**). The key design objectives of the site are:

- Deliver Hoo Peninsula Strategic Environmental Programme objectives through management measures, improve the condition of The Medway Estuary and Marshes SSSI, and Medway Estuary and Marshes Ramsar Site.

- Protect and appropriately manage existing habitats to support notable species identified through the SSSI and Ramsar site designations.
- Expand current habitats and create new habitats suitable for promoting the existing and future wildlife populations.
- Convert existing arable land uses to support appropriate wetland habitat systems. To align with existing site designations and longer-term aspirations for the Hoo Peninsula and Hoo Estuary.
- Provide enhancements to the Hoo hydrological infrastructure systems through the introduction of naturalised drainage and a series of wetland habitat typologies.
- Enhance connectivity and rework existing path networks to provide sensitive routes. Visitors to only have controlled access to the site, ensuring existing and new wildlife habitats are protected.
- Educate and celebrate, through site interpretation, the rich heritage, wildlife, and hydrological systems found on site and the wider Hoo Peninsula.
- Ensure the long-term management of the wetland, including on-site ranger facilities. This will enable habitats and key species to thrive and will allow for the maintenance of visitor facilities.



Figure 7.5 Location of Hoo Wetlands Reserve

7.2.24 Deangate Community Parkland is located on Deangate Ridge, north of the urban areas of Chattenden and Hoo St Werburgh, and to the South-West of High Halstow (see **Figure 7.6**). The site was originally used as a golf course and more recently public recreation space to the South of the Lodge Hill Training Area. The scheme has planning permission and the project is being delivered using Section 106 funding. The key design objectives of the Deangate Community Parkland are:

- Create a substantial public open space of at least 43.3 hectares which delivers SEMS objectives.
- Respond positively to the site context, and landscape character of Chattenden Ridge.
- Celebrate nature through nurturing existing habitats and creating new ones.
- Increase public knowledge of the importance of the Nightingale population and the habitats they populate.
- Provide key visitor facilities including extensive space for passive recreation.
- Create a network of safe and attractive routes for dog walkers, walkers and cyclists.



Figure 7.6: Location of Deangate Community Parkland

7.2.25 Given its inland location, the role of the Hoo Peninsula Strategic Environmental Programme, to divert a significant number of visitors away from coastal designated sites is limited in Natural England's view as it will be a local community facility rather than a designation country park attracting large numbers of visitors. This is because visitors to the north Kent coast (and designated sites) are attracted by their coastal location and features, something that would not be replicated in an inland parkland site. However, it is noted that this Programme could be effective at encouraging use of alternative greenspace at the more local/neighbourhood level, especially for people regularly walking or dog-walking from their homes to nearby rural sites.

- 7.2.26 The residual recreational effect of population growth across the Hoo Peninsula on the designated sites, both at designated coastline areas and designated areas more inland which are accessible from the PRoW network, could be addressed through enhanced visitor access management. This will also be relevant to allocations within close proximity to designated sites along the southern boundary of the Medway Estuary, from Chatham Docks moving eastwards (see **Figure 7.2**). This could be achieved through an enhanced SAMMS scheme which would address the scale of housing development which is located close to designated sites. Enhanced SAMMS may include the funding of an additional long-term, dedicated warden scheme and management and maintenance programme for the above SEMS sites but embedded in tried and tested Bird Wise structures.
- 7.2.27 The Hoo Peninsula Strategic Environmental Programme will therefore also comprise a number of GI improvements and projects. These may include enhancements to the condition, wayfinding and interpretation of the PRoW network across the peninsular and inclusion of safe pedestrian access between green spaces. GI measures may also comprise a programme to raise awareness of site sensitivities and promote the location of alternative recreational resources. This may include the use of mobile rangers to promote and manage the Programme and ensure the engagement and involvement of the local community.
- 7.2.28 The Hoo Peninsula Strategic Environmental Programme will be secured through both Policy S2 (see **paragraph 7.2.18**), Policy SA8 (see **paragraph 7.2.19**) and the Infrastructure Delivery Plan (IDP) as set out in Policy 24 (Infrastructure Delivery). The IDP sets out the required level and phasing of infrastructure to support the proposed development. The IDP is an iterative document that is to be monitored and reviewed over time to ensure the timely and effective delivery of infrastructure.
- 7.2.29 Whilst the final details of the Hoo Peninsula Strategic Environmental Programme are currently being worked up, it is expected that funding for long-term management of measures such as the Hoo Peninsula Strategic Environmental Programme, in perpetuity, will be secured through the IDP. The Programme will also link to other wider initiatives such as wider GI provision and greenspaces, Biodiversity Net Gain (BNG) delivery and Local Nature Recovery Networks (LNRN). Homes England is developing an environmental Framework Plan across the wider Lodge Hill site, with potential to integrate with Deangate Community Parkland as part of a strategic programme for the Hoo Peninsula. The Programme will be taken forward by a number of stakeholders including the Council, Natural England, nature conservation bodies and organisations, local community groups and developers. A delivery body, such as a third-party environmental body/charity/trust, will be set up to ensure the long-term management of the Programme in perpetuity.
- 7.2.30 Policy T19 – Riverside Path – sets out the aspiration for provision of a riverside path across the Plan area. This policy reads as follows:
- 7.2.31 *“Waterfront development proposals will incorporate public space to facilitate walking and cycling and demonstrate the highest design standards, including Local Transport Note 1/20 (Cycle Infrastructure Design) and Sport England’s Active Design guidance. Development proposals will demonstrate how any impacts will be mitigated. Opportunities to provide linkages with other path networks should be explored where these are compatible with other policies and do not result in impacts on coastal designated sites”.*

- 7.2.32 Policy SA4 – River Waterfront – aims to provide greater accessibility for residents to the waterfront through increased permeability and connectivity. This will take the form of a strong greenway link to Gillingham District centre and a riverside walk connecting St Marys Island to the Strand, which is the missing link to provide a comprehensive riverside walk to the rest of Medway. Policy SA4 contains mitigation wording to protect European sites and areas of functionally linked land from these impacts *“Any enhancement in waterfront accessibility will have no adverse impact upon the integrity of the North Kent Marshes designations (and FLL), either alone or in-combination”*.
- 7.2.33 The design aspiration for enhanced waterfront accessibility and active travel along the waterfront is echoed in other policies of the MLP, although specific details are not provided. These policies include Policy DM16 - Chatham Waters Line and Policy S5 – Securing Strong Green and Blue Infrastructure. The improvement of waterfront accessibility close to the North Kent Marshes has the potential to increase recreational pressures at these areas. Mitigation is therefore incorporated within the supporting text for these policies which indicates that any enhancements must have no adverse impacts upon any of the North Kent Marshes sites.
- 7.2.34 Mitigation to ensure no adverse effects occur at any European site as a result of improved waterfront access and the Riverside Path is provided through Policy S3 (North Kent Estuary and Marshes Designated Sites Note) and also within Policy T20 itself, which reads *“Opportunities to provide linkages with other path networks should be explored where these are compatible with other policies and do not result in impacts on coastal designated sites”*.
- 7.2.35 Whilst it is considered that mitigation outlined above is likely to ensure no adverse impact upon the site integrity of any European site from recreational impacts, as the final details of Hoo Peninsula Strategic Environmental Programme are yet to be finalised, and taking a precautionary approach, no conclusion is drawn in this HRA report. A more detailed Hoo Peninsula Strategic Environmental Programme prepared in consultation with Natural England, will inform a full AA of recreational impacts in due course.

7.3 North Downs Woodlands SAC Appropriate Assessment

Baseline information

- 7.3.1 As noted in **Section 3.7**, the North Downs Woodlands SAC is split over two locations, Halling to Trottscliffe Escarpment SSSI, and Wouldham to Detling Escarpment SSSI. The SAC is located within the Kent Down National Landscape, which forms a chain of chalk hills extending from the Hog's Back in Surrey to the White Cliffs of Dover. The North Downs Woodlands SAC consists of mature Beech forests and Yew woods on steep slopes¹⁴⁷. A small proportion of the SAC near Upper Halling falls within Medway's boundary. The SIP for the SAC notes that off-road vehicles, as well as all-terrain bikes, are having an impact on parts of the woodland; damage is associated with vehicles coming off the PRow network into the woodland¹⁴⁸.

¹⁴⁷ Natural England (2019) Supplementary Advice North Downs Woodlands SAC.

¹⁴⁸ Natural England (2015) Site Improvement Plan North Downs Woodland.

- 7.3.2 Whilst no visitor survey has been undertaken to define a formal recreational Zol for the SAC, as noted in **Section 3.7**, a visitor survey was undertaken at a small section of the Wouldham to Detling Escarpment SSSI, known as Boxley Warren LNR (outside the MLP area). This survey suggested that 75% of visitors travel 7km to visit this section of the SAC. This visitor survey data has been used as a guide zone of influence in this assessment.
- 7.3.3 The Halling to Trottiscliffe Escarpment SSSI section of the North Downs Woodlands SAC, which is located within the MLP area, can be accessed from Holly Hill Wood public open space and the Whitehorse Wood and Holly Hill Local Wildlife Site (LWS). These sites are linked to the SAC via the PRoW network. A review of ordnance survey data indicates that there is a restricted byway, the North Downs Way long distance trail, which runs in a north to south direction along the eastern boundary of the SAC. A number of PRoW link to this trail, running along the boundary of the SAC and within the SAC itself at Greatpark Wood, Hanginghill Wood and Crookhorn Wood. The Halling to Trottiscliffe Escarpment SSSI section of the SAC is poorly signposted with very little parking. A small car park is located at Holly Hill Wood. There are no visitor facilities such as toilets.
- 7.3.4 At the Wouldham to Detling Escarpment SSSI section of the North Downs Woodlands SAC, ordnance survey data shows that the Pilgrim's Way runs to its south. The North Downs Way long distance trail links to the Pilgrim's Way, running along the northern boundary of the SAC in a north west to south east direction. Whilst there is no formal parking at the SAC, there are a number of settlements including Detling and Boxley which are likely to provide parking opportunities. Access into the SAC in the north is obtained from a roman road under the A229 and over the Channel Tunnel Rail Link at the White Horse Stone local land mark. Access in the south is via the Pilgrim's Way track and PRoW network from Detling.

Appropriate Assessment

- 7.3.5 Whilst no visitor survey has been undertaken to define a recreational Zol for the SAC, as noted in **Section 3.7**, screening was undertaken on the basis of a visitor survey undertaken at a small section of the Wouldham to Detling Escarpment SSSI, known as Boxley Warren LNR (outside the Plan area). This survey suggested that 75% of visitors travel 7km to visit this section of the SAC.
- 7.3.6 Site allocations that are located within 7km of the North Downs Woodlands SAC are shown in **Figure 7.7**.

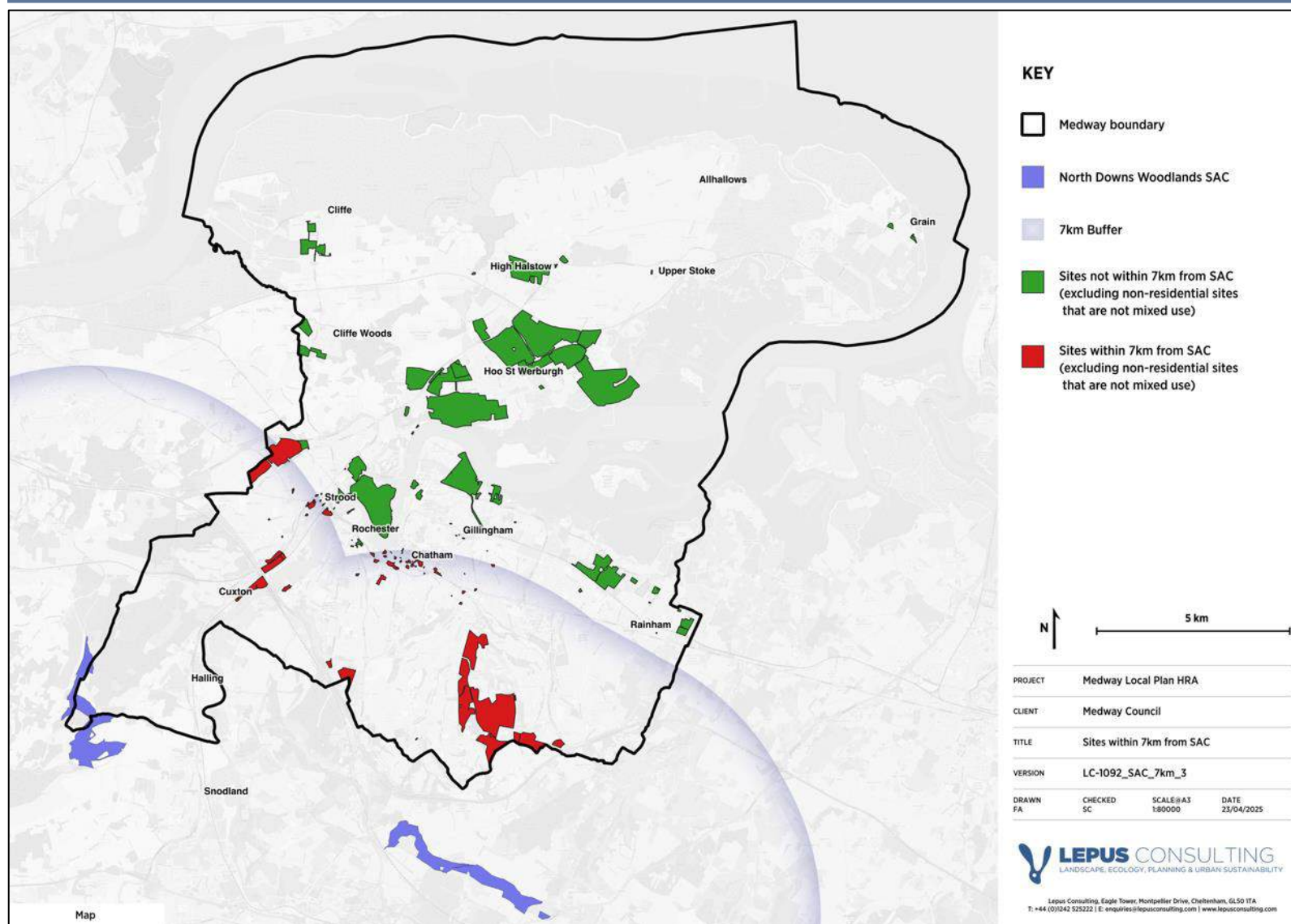


Figure 7.7: Site allocations within 7km of the North Downs Woodlands SAC

- 7.3.7 The closest residential site allocation to the Halling to Trottiscliffe Escarpment SSSI component of the SAC is CHR14, which allocates 49 dwellings, is located to the east of Cuxton, approximately 4.3km to the east of the Halling to Trottiscliffe Escarpment SSSI section of the SAC. Other residential allocations within 7km of this component of the SAC are located to the east of the M2 and within the urban areas of Strood and Chatham (see **Figure 7.7**). The closest residential site allocation to the Wouldham to Detling SSSI component of the SAC are at Capstone and at their closest point approximately 2.4km to the north of the SAC beyond the M2. Together sites at Capstone allocate approximately 3,398 new dwellings.
- 7.3.8 All preferred indicative sites set out in the MLP, with the exception of Site CHR14, are separated from the North Downs Woodland SAC by the M2. This strategic route presents a considerable barrier to movement.
- 7.3.9 The Halling to Trottiscliffe Escarpment SSSI section of the North Downs Woodlands SAC, which is located within the Plan area, can be accessed from the adjacent Holly Hill Wood public open space and Whitehorse Wood & Holly Hill LWS to the south. These sites are linked to the SAC via the PRoW network. A restricted byway runs through the centre of this section of the SAC. The Halling to Trottiscliffe Escarpment SSSI section of the SAC is poorly signposted, with very little parking. A small car park is located at Holly Hill Wood. There is also a lack of visitor facilities such as toilets. It is noted that the SAC itself at this location is topographically steep with the main byway running along the top of the escarpment. This topography is likely to naturally restrict access off the main byway to other sections of the SAC and prevent recreational impacts.
- 7.3.10 The Tonbridge and Malling Borough Council HRA¹⁴⁹ provides a review of accessibility at the Wouldham to Detling Escarpment SSSI section of the North Downs Woodlands SAC. The HRA notes that there are two main access routes within the SAC. The first access route is accessible from roadside parking on Old Chatham Road, where the roadside parking is heavily restricted, with access to the site gained via an urbanised footpath which runs under the A229 and over the Channel Tunnel Rail Link. The access from parking to site is approximately 0.5 km, which is considered to be undesirable to routine users. Although this access track leads walkers past a local land mark, The White Horse Stone, it is currently showing signs of damage by graffiti, which is likely to detract from the site's aesthetic appeal. The second access point is the west of the site, off the Pilgrim's Way road near Detling. The parking at this location is limited to small laybys which are poorly service by access tracks. In addition to these access issues, there is limited sign provision for visitors looking to access the site, which limits incidental discovery of the SAC, and though the large woodland tracks may appeal to some visitors, they are unlikely to appeal to those seeking numerous vistas or a variety of habitats. The topography at this component of the SAC is also steep. The North Downs Way long distance route runs along the top of the escarpment at this point and due to the steep nature of the site access off this route is likely to be naturally restricted, preventing recreational impacts.

¹⁴⁹ Tonbridge and Malling Borough Council (2019). Habitats Regulations Assessment.

- 7.3.11 A desktop review has indicated that there are a number of existing publicly accessible spaces, with similar habitat characteristic to the North Downs Woodlands SAC, in closer proximity to the MLP allocations than the SAC. These include country parks, parkland and nature reserves such as Capstone Farm Country Park, Blue Bell Hill, Riverside Country Park and Shorne Country park in Gravesham. A number of these sites also provide better facilities such as parking, cafes, play areas and signed footpaths.
- 7.3.12 As noted, in the SIP for the North Downs Woodland SAC, the key recreational threat at the woodland is in relation to antisocial behaviour (off-road vehicles) rather than recreational disturbance. Under the Valley of Visions Landscape Partnership Scheme, the Securing the Landscape Project¹⁵⁰ was set up in the Medway Gap to help manage the illegal activity and reduce potential impacts in a joint initiative with stakeholders including Kent Police and local landowners. A Police Community Support Officer (PCSO) for the area was funded through this project. This project had a positive impact on managing access to, and on the condition of the North Downs Woodlands SAC. Discussions are currently ongoing between the partnership and Police service to continue this project.
- 7.3.13 Whilst no specific adverse recreational impacts are anticipated from the MLP upon the North Downs Woodlands SAC, a number of policies in the MLP will go towards ensuring that an appropriate level of open space is provided for new development. These policies include Policy S5 (Securing Strong Green and Blue Infrastructure), Policy T28 (Existing open space, outdoor sports and play spaces) and Policy DM21 (New open space, outdoor sports and playing pitches).
- 7.3.14 The HRA has taken into consideration mitigation that is already in place to address threats from off road vehicles, the distance of allocations from the SAC, restricted facilities (parking etc) at the SAC, the topography of the SAC, availability of other publicly accessible spaces closer to the Plan area and the policy framework set out at **Paragraph 7.3.13** in respect of GI and open space. On the basis of these points, it can be concluded that there will be no adverse impact as a result of the MLP either alone or in-combination on the North Downs Woodlands SAC due to increased recreational pressures.

¹⁵⁰ Valley of Visions Landscape Partnership Scheme. General Booklet.

8 Urbanisation Appropriate Assessment

8.1 Introduction

8.1.1 The following section of the AA focuses on assessing the ecological impacts of increased urbanisation from the MLP upon the qualifying features of the following European sites, and areas of associated FLL:

- Medway Estuary and Marshes SPA and Ramsar
- Thames Estuary and Marshes SPA and Ramsar
- The Swale SPA and Ramsar

8.1.2 The HRA screening process (**Appendix C**) concluded that the following policies have the potential to result in LSEs on these sites as a result of urbanisation:

- Spatial Development Strategy
- Policy T7 – Houseboats
- Policy T9 - Self-Build and Custom Housebuilding
- Policy T10 - Gypsy, Traveller & Travelling Showpeople
- Policy S10 – Economic Strategy
- Policy S11 – Existing Employment Sites
- Policy S12 – New Employment Sites
- Policy S18 – Chatham Town Centre
- Policy S19 – Rochester District Centre
- Policy S20 – Gillingham District Centre
- Policy S21 – Strood District Centre
- Policy S22 – Rainham District Centre
- Policy S23 – Hoo Peninsula
- Policy T21 – Riverside Infrastructure
- Policy T22 – Marinas and Moorings
- Policy T32 – Supply of Recycled and Secondary Aggregates
- Policy T33 – Extraction of Land Won Materials
- Policy T32 – Supply of Recycled and Secondary Aggregates
- Policy T33 – Extraction of Land Won Materials
- Policy T36 – Location of Waste Management Facilities
- Policy T37 – Other Recovery
- Policy T38 – Landfill
- Policy T39 – Beneficial Use of Inert Waste by Permanent Deposit
- Policy T40 – Wastewater Treatment
- Policy S25 – Energy Supply
- Policy SA1 – Chatham Town Centre and Surrounds
- Policy SA2 – Heritage-led Sites
- Policy SA3 – Gillingham District Centre
- Policy SA4 – River Waterfront

- Policy SA5 – Strood Town Centre and Surrounds
- Policy SA6 – Chapter Farm / Land west of Strood
- Policy SA7 – Capstone Valley
- Policy SA8 – Hoo St Werburgh and Chattenden
- Policy SA9 – High Halstow
- Policy SA10 – Lower Rainham
- Policy SA11 – Rural Settlements
- Policy SA12 – Other Sites
- Policy SA13 – Frindsbury Peninsula Opportunity Area
- Policy SA14 – Employment Sites

8.1.3 The screening assessment in **Chapter 4 (Appendix D)** drew on SSSI IRZ data published by Natural England. All allocations within or adjacent to the SSSI IRZ associated with the European sites listed above (**paragraph 8.1.1**) were screened in for further assessment.

8.2 Baseline Information

Introduction

- 8.2.1 As noted in **Section 3.8**, urbanisation effects can result from all types of development set out in the MLP including housing, retail and employment. Urbanisation effects often occur where development is located within close proximity to a European site. Urbanisation impacts may include the direct loss / damage to habitat, construction and operation related noise pollution, light pollution, vibration, visual disturbance, dumping of waste, predation from domestic pets, vandalism, spread of invasive plant species and encroachments from properties among other impacts. An increase in noise and vibration levels, artificial lighting and sources of visual disturbance has the potential to cause birds to fly away, resulting in energy expenditure and abandonment of feeding or resting places. These urbanisation impacts can also affect other features of the North Kent Marshes, such as invertebrates and plants, through direct loss / damage of habitat and a change in diurnal patterns through sources of artificial lighting.
- 8.2.2 Urbanisation effects have the potential to impact both the qualifying features of a European site but also qualifying species when they are located outside a designation boundary (FLL). In addition to direct impacts upon areas of FLL, urbanisation also has the potential to cause the fragmentation of connecting habitat (such as hedgerows and water features) between designated sites and other areas of FLL. Fragmentation can lead to the isolation of habitat and an increase in urban edge effects.

North Kent Marshes

8.2.3 Given the contiguous nature of the North Kent Marshes listed above (**paragraph 8.1.2**), this section of the AA considers these designations collectively. The North Kent Marshes are designated due to their importance for wintering waterfowl, breeding waterfowl, breeding and wintering raptors and a range of rare plants and invertebrate species¹⁵¹. A number of these species use habitats both within and outside the SPA and Ramsar designation boundaries due to the range of species habitat requirements (see **Appendix F**). The Conservation Advice for the Swale and Medway EMS and the Thames EMS indicates that supporting habitat for the avian features of the corresponding SPA designations include:

- Intertidal mudflats provide a rich source of invertebrates, shellfish, worms and plants such as eelgrass and algae. These areas are the main feeding ground for wintering species.
- Intertidal saltmarsh is the predominantly vegetated part of the intertidal area and provides high tide roosting and feeding habitat within the vegetation, exposed areas of mud and network of creeks. Some areas are grazed by domestic livestock which provides variations in vegetation type.
- Shallow inshore and coastal waters provide prey including fish, crustaceans and worms for species such as Little Tern (*Sterna albifrons*) and Great Crested Grebe (*Podiceps cristatus*).
- Intertidal shingle beaches provide nesting habitat for species such as Little Tern^{152,153}.

8.2.4 Land outside the designation boundary is known as FLL (see **paragraph 3.3.8**) FLL may include foraging inland for instance at agricultural fields (used by Brent Goose (*Branta bernicla bernicla*), Bewick Swan (*Cygnus columbianus bewickii*), Greater White Fronted Goose (*Anser albifrons albifrons*), Lapwing (*Vanellus vanellus*) and Golden Plover (*Pluvialis apricaria*)) or roosting in fields adjacent to the coast (used by Dunlin (*Calidris alpina*)). It may also include waterbodies and intertidal mudflat habitat which supports invertebrates or other wetland habitats supporting plants. As such, FLL may also provide a crucial supporting role to the qualifying species of the North Kent Marshes.

8.2.5 There is currently a high level of dense urban development and infrastructure in close proximity to these coastal designations within the main towns of Medway at Rainham, Gillingham, Chatham, Strood and Rochester. The Hoo Peninsula, which separates the Thames and Medway estuaries, is largely farmed and has a much more rural and open feel with significantly less development and associated infrastructure. Fields are bound by creeks and ditches, and the landscape supports features associated with saltmarsh and intertidal mudflats. In places, grazing marsh has been converted to arable cultivation¹⁵⁴.

¹⁵¹ LILEY, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

¹⁵² English Nature (2001) Swale and Medway EMS. English Nature's advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994.

¹⁵³ English Nature (2001) Thames Estuary EMS. English Nature's advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994.

¹⁵⁴ Ricardo Energy and Environment. 2021. Hoo Peninsula CEClA.

- 8.2.6 The main settlement is at Hoo St Werburgh with smaller settlements at High Halstow, Stoke, Grain and Allhallows all connected by the A228. Given its strategic position, the Peninsula supports a range of industrial and commercial facilities including Kingsnorth Quarry, London Thamesport, two power stations, Liquefied Natural Gas infrastructure and various pipelines and cables forming part of the national energy supply network, including electrical interconnectors linking to the Netherlands and to northern Germany. Aviation fuel is also imported, stored and distributed from the Isle of Grain. There are four RSPB reserves on the peninsula including Northward Hill, Cliffe Pools, Shorne Marshes and Higham Marshes. Any increase in urban development has the potential to increase levels of noise and vibration, visual disturbance, artificial lighting and other urbanisation effects set out in **paragraph 8.2.1**. Due to the openness of the Hoo Peninsula urbanisation effects, particularly those relating to lighting, visual disturbance and noise impacts upon species of bird and invertebrates are likely to be exacerbated.

8.3 Appropriate Assessment

Methodology

- 8.3.1 As noted in **Section 8.1**, the screening assessment drew on Natural England's SSSI IRZs which cover the interest features and sensitivities of European sites which are underpinned by SSSI designations. This AA takes into consideration other site and location specific factors which may result in urbanisation impacts upon European sites and also areas of FLL.
- 8.3.2 The CEclA¹⁵⁵ provides an assessment of the potential for FLL at development sites across the Hoo Peninsula. Drawing on the findings of the CEclA, and taking a precautionary approach, it is assumed for the purposes of this AA that areas of grazing marsh habitat, on the Hoo Peninsula in particular, could serve as FLL. In addition, it is assumed that other areas of open grassland or arable land adjacent to European sites and also land in close proximity to the RSPB reserves on the peninsula including the reserves at Shorne Marshes, Higham Marshes, Cliffe Pools and Northward Hill could also be functionally linked. **Figure 8.1** illustrates the location and distribution of priority habitats across the Plan area and also the location of the RSPB reserves.

¹⁵⁵ Ricardo Energy and Environment. 2021. Hoo Peninsula CEclA.

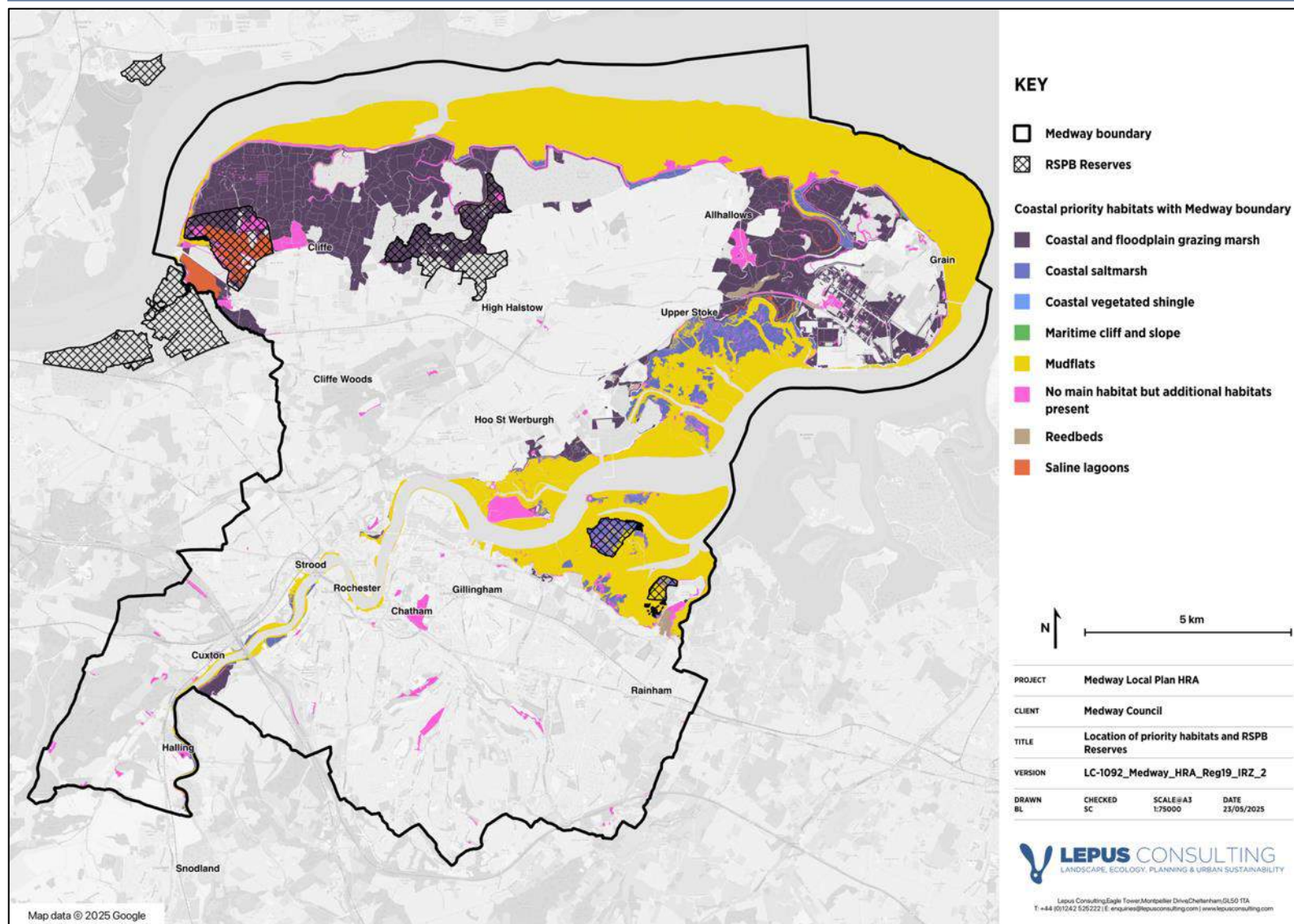


Figure 8.1: Location of priority habitat and RSPB reserves

8.3.3 The desktop assessment of urbanisation effects has therefore taken into consideration the suitability of the habitat at each site allocation and within the surrounding area, alongside other factors listed below.

- Distance from the European site (sites closer to an SPA and/or Ramsar site are more likely to provide roosting and /or foraging opportunities for birds).
- Proximity to RSPB reserve.
- Availability of priority habitat which may support qualifying species associated with the North Kent Marshes.
- Site characteristics including details on:
 - Habitat type;
 - Cropping regime, including how often the site is planted with a suitable crop;
 - Visibility (for example are there unrestricted sight-lines);
 - Details of any field boundaries (trees/hedgerows/field drains);
 - Details of any permanent waterbodies, areas of seasonal flooding; and
 - The size of the site.
- Details of any existing factors (where available) that may affect the habitat suitability, including:
 - Existing PRow and their usage, especially by users with dogs;
 - Proximity to existing built up areas; and
 - Existing farming practices (for example the use of bird scarers/deterrents).
- Noise and visual disturbance - drawing on the Waterbird Disturbance Tool Kit¹⁵⁶ (**Table 8.1**).
- Cat predation ranges.
- Presence of large and/or multiple overhead power lines.

8.3.4 Research suggests that disturbance is more likely to have an impact on bird populations where it is not continuous in nature. Sources of disturbance which are irregular and infrequent are also likely to have a greater impact, as birds are less likely to be habituated to these sources of disturbance. Disturbance, excluding recreational pressure which is addressed in **Chapter 7**, is therefore a function of the scale of disturbance, the distance of the source of disturbance and its frequency and duration. As set out in **Table 8.1**, the most sensitive species to disturbance are likely to respond to visual and noise stimuli at 500m.

¹⁵⁶ The Waterbird Disturbance Mitigation Toolkit. TIDE tools - tide-toolbox.eu. Available at: https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer_public/8f/bd/8fbd7e9-ea6f-4474-869f-ec1e68a9c809/11367.pdf [Date Accessed: 20/07/21]

Table 8.1: Waterbird Disturbance Toolkit – Species disturbance distances

Bird species listed in Waterbird Disturbance Toolkit ¹⁵⁷	Visual disturbance distance	Noise disturbance distance
Brent Goose (<i>Branta bernicula</i>)	Foraging – 105m Roosting or loafing – 205m	100m - 110-115dB 300m - 120-125dB
Shelduck (<i>Tadorna tadorna</i>)	500m	150m - 115-120dB 500m - 125-130dB
Mallard (<i>Anas platyrhynchos</i>)	200m	50m - 105-110dB
Oystercatcher (<i>Haematopus ostralegus</i>)	200m	50m - 105-110dB
Ringed Plover (<i>Charadrius hiaticula</i>)	50m	50m - 107-112dB
Golden Plover (<i>Pluvialis apricaria</i>)	200m	300m - 107-112dB
Grey Plover (<i>Pluvialis squatarola</i>)	200m	150m - 115-120dB 500m - 125-130dB
Lapwing (<i>Vanellus vanellus</i>)	300m	200m - 115-120dB
Knot (<i>Calidris canuta</i>)	100m	50m - 100-105dB
Dunlin (<i>Calidris alpina</i>)	75m	75m - 102-107dB
Black-tailed Godwit (<i>Limosa limosa</i>)	250m	100m - 110-115dB
Curlew (<i>Numenius arquata</i>)	300m	100m - 107- 112dB 300m - 117-122dB
Redshank (<i>Tringa totanus</i>)	100m	75m - 100-105dB
Turnstone (<i>Arenaria interpres</i>)	50m	50m - 107-112dB

8.3.5 Other urbanisation effects, such as householder related garden waste dumping, vandalism, or anti-social behaviours, are likely where housing is located within close proximity to development. For other mitigation strategies across the UK, a distance of 400m has been used to represent the distance from which people will access designated sites by foot (rather than accessing sites from car parking locations as with recreational impacts).

8.3.6 The CEclA recognises that domestic cats have an average roaming range of 360m¹⁵⁸. It is however noted that cat predation is predominantly associated with woodland and garden birds, and the qualifying bird species associated with the North Kent Marshes are therefore less likely to be susceptible to cat predation due to the coastal environment in which they are found.

¹⁵⁷ Note: not all qualifying features of the North Kent coastal designations are included in the Waterbird Disturbance Toolkit.

¹⁵⁸ “The small home ranges and large local ecological impacts of pet cats” (Animal Conservation, ZSL 2020) R. Kays R. R. Dunn A. W. Parsons B. McDonald T. Perkins S. A. Powers L. Shell J. L. McDonald H. Cole H. Kikillus L. Woods H. Tindle P. Roetma

Appropriate Assessment

- 8.3.7 A detailed assessment of each allocation against the above criteria is included in **Appendix G**. Considering the location and nature of each allocation, their relationship within the wider landscape of the Hoo Peninsula which is open and rural in nature, proximity to the Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA and Ramsar designations and species habitat requirements, the allocations listed in **Table 8.2** and **Figure 8.2** have the potential to have adverse urbanisation impacts upon both the North Kent Marshes sites and also FLL.

Table 8.2: Site allocations with potential for urbanisation impacts (Appendix G)

Allocation	Urbanisation impacts upon North Kent Marshes	Urbanisation impacts upon areas of FLL
HHH32	Yes – avian and invertebrates	Yes – avian
HHH12 Residential 1801	Yes – avian	No
HHH25 Residential 80	Yes – avian	Yes – avian
HHH24 Residential 85	Yes – avian	Yes – avian
HHH33 Residential 330	Yes – avian	Yes – avian
HHH22 & HHH31 Residential 1700	Yes – avian	Yes – avian
HHH35 Employment – flexible	Yes – avian	Yes – avian
HHH36 Employment – Energy from Waste facility and other flexible development	Yes – avian, invertebrates and plants	Yes – avian
GN6 Residential 400	Yes – avian, invertebrates and plants	Yes – avian, invertebrates and plants
GN15 Residential 1100	Yes – avian, invertebrates and plants	Yes – avian, invertebrates and plants
HHH26 Residential 760	Yes – avian	Yes – avian
HHH29 Residential 55	Yes – avian	Yes – avian
RN9 Residential 800	Yes – avian	Yes – avian
SR51 Residential 250	Yes – avian, invertebrates and plants	Yes – avian
AS28 Residential 9	Yes – avian, invertebrates and plants	Yes – avian, invertebrates and plants
SR49 Residential 6	No	Yes – avian, invertebrates and plants
SR48 Residential 8	No	Yes – avian, invertebrates and plants
SR53 Residential 690	No	Yes – avian, invertebrates and plants

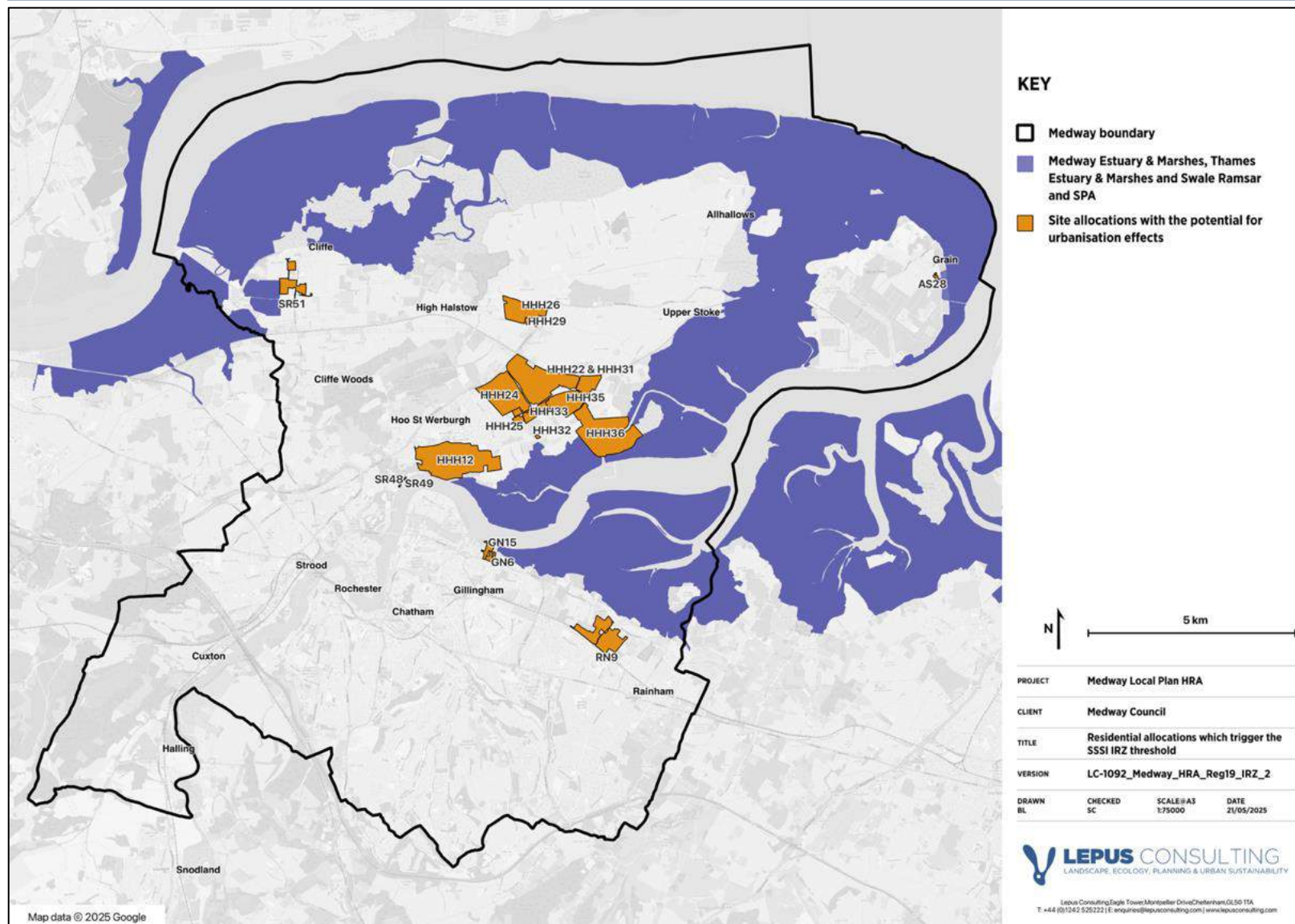


Figure 8.2: Site allocations with the potential for urbanisation effects

Mitigation

- 8.3.8 Other mitigation strategies across the UK have excluded development within a 400m zone where urbanisation effects are likely. The bird disturbance research undertaken on behalf of the North Kent Environmental Planning Group looked at the possibility of including an exclusion zone within the SAMMS Bird Wise scheme (see **Section 7.2** for more details on the Bird Wise scheme). This concluded that a 'sterile' zone of no development around the North Kent SPAs would encompass ports, town centres, very built-up residential areas and contaminated brownfield sites and therefore development would potentially be halted or pushed to greenfield sites and prevent the regeneration of urban centres¹⁵⁹. As such, a coastwide 400m exclusion zone was not considered further as part of the SAMMS. As noted in **paragraph 3.8.3**, a 400m buffer zone may also not be appropriate given the nature of the Hoo Peninsula which is open and rural and also the qualifying avian species which are coastal rather than heathland / woodland birds.
- 8.3.9 Given the proximity the allocations listed in **Table 8.2** to both designated sites and potential areas of FLL, it is necessary to ensure that operational and construction related noise and vibration levels, visual disturbance and lighting proposals do not have a disturbance impact upon the qualifying bird or invertebrate species.
- 8.3.10 Development at all allocations located in the SSSI IRZ associated with the North Kent Marshes European sites should be preceded by bird surveys including surveys for overwintering and breeding birds. These surveys should be undertaken at times of the year which are reflective of both tidal states and the season in order to ascertain whether the qualifying features of the North Kent Marshes are likely to be impacted by development proposal, either in the construction and/or operational phase. Invertebrate and NVC surveys should also be undertaken where there is potential for an allocation to provide habitat which has the potential support the notified invertebrate or plant species associated with the Ramsar designations. This requirement is secured through wording in Policy S3.
- 8.3.11 Outputs from these surveys will inform requirements for mitigation measures which may include the incorporation of screens, planting, bunds, fencing, directional lighting, and low noise emitting equipment among other solutions. The CEclA provides a number of suggested best practice methods including compliance with lighting¹⁶⁰ and noise¹⁶¹ standards, quiet construction techniques and timing of work to avoid sensitive seasons. Noise limits should be put in place which are species specific, as set out in **Table 8.1**, and reflect the outputs from bird surveys. Noise levels should be monitored throughout construction and operation of sites. In addition, use should be made of visual screens and acoustic barriers. Construction method statements and management plans should be put in place to specify sensitive construction techniques and equipment. All applications for development within the SSSI IRZ associated with the North Kent Marshes European sites should be accompanied with detailed noise assessments and lighting strategies.

¹⁵⁹ Liley, D. & Underhill-Day, J. (2013). Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology

¹⁶⁰ Guidance Note 08/18 'Bats and artificial lighting' by the Bat Conservation Trust and the Institution of Lighting Professionals (2018)

¹⁶¹ BS 5228-1:2009+A1:2014: "Code of practice for noise and vibration control on construction and open sites. Noise

-
- 8.3.12 At the detailed design stage, the layout and design of development at each allocation should avoid proximity to designated sites or areas of FLL and incorporate planting and other measures to naturally avoid potential disturbance impacts. Waterbodies and coastal and floodplain grazing marsh habitat should be retained on site and enhanced where possible.
- 8.3.13 The above mitigation measures are secured in Policy S3 which notes that:
- 8.3.14 *“Development at the allocation sites within the SSSI IRZ associated with the North Kent Marshes European sites should be preceded by bird, invertebrate and habitat surveys to investigate whether these parcels of land (or adjacent land parcels of land) support a significant population of birds, invertebrates or plants, for which the North Kent Estuary and Marshes sites are designated or classified and whether each site plays an important role in maintaining or restoring the population of qualifying species at favourable conservation status. Surveys be undertaken in the appropriate survey season and following best practice methods. Outputs from these surveys will inform requirements for mitigation measures which may include sensitive site layout and the incorporation of screens, planting, bunds, fencing, directional lighting, and low noise emitting equipment among other solutions. The output of any bird / invertebrate / habitat surveys should input to master planning and ongoing monitoring should be implemented.*
- 8.3.15 *Project level applications should be supported by an HRA to ensure that development has no adverse impact on site integrity. All applications for development at the allocations set out should be accompanied with detailed noise assessments and lighting strategies and where necessary construction method statements and management plans should be put in place”.*
- 8.3.16 In addition, it is anticipated that the following policies which comprise the MLP will have a positive impact and contribute towards mitigating the impact of increased urbanisation effects at European sites:
- Policy S2: Conservation and Enhancement of the Natural Environment. This is a positive policy which seeks to protect European sites and compliance with the Habitats Regulations.
 - Policy DM1: Contaminated Land. This policy requires remediation of contained sites for development and protection of the environment.
 - Policy DM4: Noise and Light Pollution. This policy seeks to reduce noise and light pollution from new development on the natural environment and ecology.

8.3.17 The exact details of the required mitigation measures will be provided at the planning application stage. This reflects the hierarchical nature of plan making and ensures that mitigation is indicative of final site proposals. Given there are widely used techniques available to mitigate urbanisation impacts, there is no uncertainty over the deliverability of these allocations. As an example, a planning application for the Uniper Scheme for MedwayOne (former Kingsnorth Power Station - HHH36) has received outline consent for an energy from waste facility. This was supported by an HRA report which set out requirements for mitigation measures covering a similar range of solutions to those recommended here¹⁶². These included mitigation measures such as a Construction Method Statement, External Lighting Strategy, Construction Environmental Management Plan, a Dust Management Plan, sensitive landscape design, an External Lighting Strategy and a Drainage Strategy.

8.3.18 This approach is compliant with case law which requires the Competent Authority to be satisfied that mitigation solutions can be achieved in practice^{163, 164}, whilst recognising the multi-staged planning and approval procedural approach to plan making¹⁶⁵.

Conclusion

8.3.19 Taking into consideration the planning policy requirements in Policy S3 and site allocation policy wording, it can be concluded that there will be no adverse impacts on the integrity of any European site or areas of FLL, either alone or in-combination, as a result of urbanisation effects.

¹⁶² Aspect Ecology (2021) MedwayOne, Former Kingsnorth Power Station Report to Inform a Habitats Regulations Assessment and Appropriate Assessment.

¹⁶³ Ltd (NANT Ltd) v Suffolk Coastal District Council, Court of Appeal, 17 February 2015. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Core-Strategy-and-DMP/No-Adastral-New-Town-Ltd-v-SCDC.pdf> [Date Accessed: 11/11/21]

¹⁶⁴ Opinion of Advocate General Kokott delivered on 9 June 2005. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland. Failure of a Member State to fulfil obligations - Directive 92/43/EEC - Conservation of natural habitats - Wild fauna and flora. Case C-6/04. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62004CC0006> [Date Accessed: 11/11/21].

¹⁶⁵ R (o a o Devon Wildlife Trust) v. Teignbridge DC [2015] EWHC 2159 (Admin). 28 July 2015. Available at: <https://www.casemine.com/judgement/uk/5a8ff76460d03e7f57eac083> [Date Accessed: 11/11/21]

9 Next Steps

9.1 Summary

9.1.1 The MLP is not directly connected with or necessary to the management of any European site. A screening assessment was therefore undertaken which identified a number of LSEs associated with the MLP. Taking no account of mitigation measures, the MLP has the potential to affect the following European sites:

- **Medway Estuary and Marshes SPA** – air quality, hydrology, recreational pressure and urbanisation impacts
- **Medway Estuary and Marshes Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **Thames Estuary and Marshes SPA** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **Thames Estuary and Marshes Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **The Swale SPA** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **The Swale Ramsar** – air quality, hydrology, recreational pressure and urbanisation impacts.
- **North Downs Woodlands SAC** – air quality, hydrology and recreational pressure.

9.1.2 The HRA therefore progressed to the next stage of the HRA process: AA. The following matters were explored in more detail:

- Impacts on designated features affected by a possible deterioration in air quality.
- Impacts on water quality and water quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure.
- Impact of urban development upon both designated sites and areas FLL.

9.1.3 A range of potential threats and pressures that might be exacerbated by the MLP were identified through the assessment process. The Precautionary Principle has been used in circumstances where likely effects were considered to be uncertain. The protective policies set out in the MLP, alongside existing protection measures in existing high level strategic and planning policy frameworks, have been factored into the assessment process.

9.1.4 The AA has concluded no adverse impacts on the site integrity of any European site due to a change in water quality or water quantity, an increase in recreational pressure or urbanisation effects as a result of the MLP either alone or in-combination. This report has however not been able to reach a conclusion regarding adverse air quality impacts upon the site integrity of the North Kent Marshes European sites and North Downs Woodlands SAC and recreational impacts upon the North Kent Marshes European sites. Further air quality modelling work which will be commissioned by the Council and a finalised Hoo Strategic Environmental Programme will be evaluated to inform a full AA of air quality and recreational impacts.

9.2 Next steps

- 9.2.1 The purpose of this interim report is to inform the HRA of the MLP using best available information. Once air quality modelling and a finalised Hoo Strategic Environmental Programme have been evaluated, this interim HRA report will be finalised.
- 9.2.2 The Council, as the Competent Authority, has responsibility to make the Integrity Test, which can be undertaken in light of the conclusions of the Final HRA report once available.
- 9.2.3 The final HRA report will be submitted to Natural England, the statutory nature conservation body, for formal consultation once available. The Council must 'have regard' to Natural England's representations under the provisions of the Habitats Regulations prior to making a final decision as to whether they will 'adopt' the conclusions set out within this report as their own.

Appendix A: In-Combination Assessment

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
Castle Point Borough Council	The current Local Plan¹ was adopted in November 1998 and saved in its totality until 2007. Since then, only certain policies are in place. The Council is currently preparing the new Castle Point Plan². An Issues and Options Consultation³ ran from July to September 2024. Once adopted, the Local Plan will guide development until 2043.	The Plan sets out the requirement of 355 dwellings per annum between 2023-2043 (7,100 total) as identified by the Standard Methodology. The Council-commissioned Local Housing Needs Assessment identified a need for 255 homes per annum (5,100 total).	An HRA⁴ was undertaken in May 2024 to support the development of the Local Plan. The HRA Scoping report identified 21 European sites within scope for the HRA, including the following: • Blackwater Estuary SPA and Ramsar • Benfleet and Southend Marshes SPA and Ramsar • Crouch and Roach Estuaries SPA and Ramsar • Dengie SPA and Ramsar • Essex Estuaries SAC • Foulness SPA and Ramsar • Medway Estuary and Marshes SPA and Ramsar • North Downs Woodlands SAC • Outer Thames Estuary SPA • Peter's Pit SAC • Queendown Warren SAC • Thames Estuary and Marshes SPA and Ramsar • The Swale SPA and Ramsar

¹ Castle Point Borough Council. Adopted Local Plan. Available at: <https://www.castlepoint.gov.uk/adopted-local-plan/> [Date Accessed: 16/06/25].

² Castle Point Borough Council (2025) Castle Point Plan Overview and Programme. Available at: <https://www.castlepoint.gov.uk/castle-point-plan-overview-and-programme/> [Date Accessed: 26/02/25].

³ Castle Point Borough Council (July-September 2024) The Castle Point Plan 2023-2043 Issues & Options Consultation. Available at: <https://www.castlepoint.gov.uk/download.cfm?doc=docm93iijm4n8212.pdf&ver=14049> [Date Accessed: 26/02/25].

⁴ Place Services (May 2024) Emerging Castle Point Local Plan Regulation 18 – Issues and Options. Habitats Regulations Assessment Scoping Report. Available at: <https://consultation.castlepoint.gov.uk/planning/castle-point-plan-hra-scoping/> [Date Accessed: 26/02/25].

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
Maidstone Borough Council	The Maidstone Borough Council Local Plan Review 2021 – 2038 ⁵ was adopted on 20 th March 2024.	The Local Plan Review will cover the period of 2021 – 2038. The new plan replaces the Maidstone Borough Local Plan (2017). Over the plan period of 2021 to 2038, provisions will be made for the development of a minimum of 19,669 dwellings within the borough. Over the plan period of 2021 to 2038, allocation of sites for a minimum of 119,250² of employment floorspace.	To support the development of the Local Plan Review 2021 - 2038, a Habitat Regulation Assessment (HRA) was undertaken in September 2021⁶. The following European sites were looked at (only those of relevance to the Medway Local Plan (MLP) HRA are listed below): • North Downs Woodlands SAC; • Queendown Warren SAC; • Peters Pit SAC; • Medway Estuary and Marshes SPA/ Ramsar; • The Swale SPA and Ramsar; and • Thames Estuary and Marshes SPA and Ramsar; Outer Thames Estuary Ramsar. The following likely significant effects were screened in: • Air pollution; • Recreation; and • Water quantity and quality. The combined impact of neighbouring authority growth, in-combination with the MLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.

⁵ Maidstone Borough Council (2024). Adopted Local Plan Review 2021 – 2038. Available at: <https://localplan.maidstone.gov.uk/home/local-plan-review> [Date accessed: 04/02/25]

⁶ LUC (2021). Maidstone Local Plan Review Habitats Regulations Assessment. Reg 19 HRA Report. Available at: <https://drive.google.com/file/d/1WLBxCeATMzrAuq94IVwLUIBye3SYxRg/view> [Date accessed: 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
Gravesham Borough Council	The Gravesham Core Strategy and Policies Maps were adopted in 2014⁷. The Council are currently undertaking a review of the Local Plan Core Strategy. A Regulation 18 Stage 2 was undertaken in 2020. This followed on from the Stage 1 consultation, which closed in 2018. The next stage will be the Regulation 19.	The Core Strategy covers the period from 1 April 2011 to 31 March 2028. The Core Strategy proposes the delivery of a minimum 4,600 new homes and 4,600 new jobs over the plan period (to 2028).	The local plan review is being supported by an HRA. To date a Scoping Report has been prepared⁸. The following European sites were considered: • North Downs Woodlands SAC; • Queendown Warren SAC; • Peters Pit SAC; • Medway Estuary and Marshes SPA/ Ramsar; and • Thames Estuary and Marshes SPA and Ramsar; Outer Thames Estuary Ramsar. The following effects were screened in: • Physical loss of/damage to habitat; • Non-physical disturbance (noise, vibration and light); • Non-toxic contamination; • Air pollution; • Recreation pressure; and • Changes to hydrological regimes. The combined impact of neighbouring authority growth, in-combination with the MLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.

⁷ Gravesham Borough Council. Gravesham Local Plan Core Strategy. 2014. Available at: <https://drive.google.com/file/d/1bJTgQLmhbzjqZFibl-5WFb2tbvixXpLk/view> and https://drive.google.com/file/d/1siQD4461VqiNqziBu0MhCPveA9eKNP_Z/view [Date Accessed: 16/06/25]

⁸ Land Use Consultants. 2020. Gravesham Local Plan HRA Scoping Report. Available at: https://localplan.gravesham.gov.uk/gf2.ti/f/1210690/83677861.1/PDF/-/Gravesham_Local_Plan_HRA_Scoping_Report.pdf [Date Accessed: 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
Swale Borough Council	The Swale Local Plan (Bearing Fruits 2031) was adopted in July 2017⁹. The review of the Swale Local Plan Review 2022 - 2040 will set out the planning framework for the borough. The Local Development Scheme sets out the timetable for the Swale Local Plan Review and states that a draft Regulation 18 consultation will be carried out in the fourth quarter of 2025, with a Regulation 19 pre-submission consultation in the second quarter of 2026 and submission at the end of the fourth quarter in 2026.	The plan review aims to meet the following needs: - B Class Employment floorspace provision (ha): 56ha (of which 15ha for office floorspace) - Housing provision: 16,608 (1,038 dwellings per annum)	The Local Plan review was supported by an HRA¹⁰. This HRA comprised a Screening and Appropriate Assessment. It looked at a number of impact pathways including: • Recreational Pressure • Atmospheric Pollution • Water Resources • Water Quality • Functionally Linked Land • Visual and Noise Disturbance • Coastal Squeeze These impacts were considered at the following European sites (only those of relevance to the MLP HRA are listed here): • The Swale SPA/Ramsar • Medway Estuary and Marshes SPA/Ramsar • Queensdown Warren SAC • North Downs Woodlands SAC The Appropriate Assessment set out policy wording to ensure mitigation was adopted in the plan around recreational impacts, air pollution, impacts upon functionally linked land, visual and noise disturbance, and water quality impacts. Following incorporation of this policy wording the HRA concluded that there would be no adverse impact on site integrity at any European site alone or in-combination. The combined impact of neighbouring authority growth, in-combination with the Medway Plan, on air quality, habitat loss / fragmentation,

⁹ Swale Borough Council (2017). Bearing Fruits 2031. The Swale Borough Local Plan. Available at: <http://services.swale.gov.uk/media/files/localplan/adoptedlocalplanfinalwebversion.pdf> [Date Accessed: 16/06/25].

¹⁰ AECOM. 2021. Swale Borough Council Local Plan HRA. Available at: [https://services.swale.gov.uk/assets/Planning%20Policy%202019/Swale%20LPR%20HRA%202021%20FINAL%20\(V2\)%20issue.pdf](https://services.swale.gov.uk/assets/Planning%20Policy%202019/Swale%20LPR%20HRA%202021%20FINAL%20(V2)%20issue.pdf) [Date Accessed: 16/06/25].

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
			hydrology and public access and disturbance impacts will be considered further in the HRA process.
Tonbridge and Malling Borough Council	The Development Plan for Tonbridge and Malling Borough Council comprises¹¹: Core Strategy (Adopted 2007) Development Land Allocation DPD (Adopted 2008) Tonbridge Central Area Action Plan (Adopted 2008) Managing Development and the Environment DPD (Adopted 2010) Local Plan Policies Map Saved Policies Kent Minerals and Waste Planning Policy The Regulation 18 consultation of the Local Plan ran from 22nd	The Local Plan has been subject to a local plan review. Examination of the Tonbridge and Malling Borough Local Plan has now taken place. The Inspector's Report recommended that the plan not be adopted. On 13 July 2021 the Council agreed that the current plan should be withdrawn¹². The Council are now working to refresh and resubmit the plan. The new Local Plan sets the vision and framework for the borough. Based on the new standard method figure of 1,096 dwellings per annum for the borough, a gross need across the plan period of 20,824 dwellings is required.	An HRA was undertaken to support the now withdrawn Local Plan. Screening Report was conducted in May 2017, followed by an HRA Air Quality Screening Report in July 2018¹³. This focused on the following European sites: • North Downs Woodland SAC • Peters Pit SAC • Queendown Warren SAC • Medway Estuary and Marshes SPA/Ramsar The reports concluded that there would be no likely significant effect on any European site from the Local Plan. The HRA work will need to be updated as part of the Local Plan refresh and resubmission. The combined impact of neighbouring authority growth, in-combination with the Medway Plan, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.

¹¹ Tonbridge and Malling Borough Council. Development Plan. Available at: <https://www.tmbc.gov.uk/local-plan/local-development-framework-planning> [Date Accessed: 16/06/25]

¹² Tonbridge and Malling Borough Council. Local Plan updates. Available at: <https://www.tmbc.gov.uk/local-plan/local-plan-updates#:~:text=On%2013%20July%202021%2C%20full,share%20updates%20on%20this%20page>. [Date accessed: 16/06/25]

¹³ Mott Macdonald (2018). Habitat Regulation Assessment Airt Quality Screening. Available at: <https://democracy.tmbc.gov.uk/documents/s32758/Appendix%204.pdf> [Date Accessed: 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
	September 2022 – 3rd November 2022. The Local Plan will form the development plan for the borough.		
Dartford Borough Council	The Dartford Plan 2024 - 2037¹⁴ was adopted on the 22nd April 2024 after a series of public consultations. The new local plan replaces all core strategy and development plan policies from the existing Core Strategy 2011 and Development Policies Plan 2017.	The new plan will replace the existing adopted Core Strategy and Development Policies Plans. It will guide key planning and infrastructure decisions by setting out the location, type and amount of new development to 2037. The plan sets out the requirement to deliver 790 per annum and 22,000sqm per annum of new commercial, business and services uses, and community and learning uses and approximately an average rate of 25,000sqm per annum of new industrial/ distribution premises.	The Regulation 19 version of the new Local Plan was supported by an HRA¹⁵. This HRA focused on the following European sites: • Thames Estuary and Marshes Ramsar/SPA • Medway Estuary and Marshes Ramsar/SPA • North Downs Woodlands SAC • Peter's Pit SAC The HRA Appropriate Assessment focused on recreational disturbance (at the Thames Estuary and Marshes Ramsar / SPA and the Medway Estuary and Marshes Ramsar / SPA) with all other LSEs and European sites being screened out. Mitigation was included in policy wording to ensure there would be no adverse impact on site integrity at either European site. The combined impact of neighbouring authority growth, in-combination with the Medway Plan, on public access and disturbance impacts will be considered further in the HRA process.

¹⁴ Dartford Borough Council (2024). The Dartford Plan. Dartford Borough's Local Plan to 2037. Available at: <https://www.dartford.gov.uk/downloads/file/2248/the-dartford-plan> [Date accessed: 16/06/25]

¹⁵ AECOM. July 2021. Dartford Local Plan Pre-Submission (Publications) Document Habitats Regulations Assessment. Available at: <https://www.dartford.gov.uk/downloads/file/2444/habitats-regulations-assessment-july-2021> [Date Accessed: 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
Thurrock Council	The Council began work on a new Local Plan in February 2014. The current Core Strategy was originally adopted on 21 December 2011 and subsequently updated on 28 January 2015 ¹⁶ .	Between 18th December 2023 and 19th February 2024, a public consultation was held for three documents that will support the emerging Local Plan, which included the Local Plan Initial Proposals, Integrated impact assessment (IIA) and the Thurrock Design Character. Consultation was undertaken on issues and options (Stage 2) in 2018. The Plan will set out the spatial vision, spatial objectives, the spatial development strategy and policies for Thurrock over the next 20 years and beyond together with a monitoring and implementation framework.	To support the development of the emerging Local Plan for Thurrock Council an HRA Scoping Report was conducted in January 2019¹⁷. The following LSEs were screened into the assessment (European sites which are within the Medway HRA study area only are listed): • Loss of habitat (Thames Estuary and Marshes Ramsar / SPA) • Disturbance (Thames Estuary and Marshes Ramsar / SPA) • Air Pollution (Thames Estuary and Marshes Ramsar / SPA) • Recreation (Thames Estuary and Marshes Ramsar / SPA and Outer Thames Estuary SPA and Ramsar site). • Hydrology (Thames Estuary and Marshes Ramsar / SPA, Medway Estuary and Marshes SPA / Ramsar and The Swale SPA and Ramsar) The combined impact of neighbouring authority growth, in-combination with the Medway Plan, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.
Southend-on-Sea Borough Council	The Council adopted Southend Core Strategy in 2007 and Southend Development Management Document in 2015¹⁸. The Council is currently preparing a new Local Plan.	The new Local Plan consultation document identified local housing and economic needs as equating to 23,620 new homes and 11,000 new jobs over 20 years.	An Integrated Impact Assessment was undertaken to support the 'Refining Options' consultation which identified the need for HRA at future stages of the Plan making process ²⁰ .

¹⁶ Thurrock Council (2015). Thurrock Council local Plan. Available at: https://www.thurrock.gov.uk/sites/default/files/assets/documents/core_strategy_adopted_2011_amended_2015.pdf [Date Accessed: 16/06/25]

¹⁷ LUC (2019). Habitat Regulation Assessment Scoping Report. Available at: <https://www.thurrock.gov.uk/sites/default/files/assets/documents/localplan-hra-scoping-201901-v01.pdf> [Date accessed 16/06/25]

¹⁸ Southend-on-Sea City Council. Adopted Plans. Available at: <https://planningpolicy.southend.gov.uk/adopted-plans> [Date Accessed: 16/06/25].

²⁰ AECOM (2021) Integrated Impact Assessment (IIA) for the Southend-on-Sea Local Plan. Available at: <https://localplan.southend.gov.uk/evidence-documents> [Date Accessed: 16/06/25].

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
	In 2021 the Council consulted on the 'Refining Options' consultation ¹⁹ .		
Medway Local Transport Plan	The Medway Local Transport Plan came into force in April 2011 and covers the period to 2026 ²¹ .	It sets the transport strategy for a 15-year period. It looks at issues such as public transport and accessibility through improvements in walking and cycling.	An HRA was not prepared in support of this plan. However, policies will be considered in the in-combination assessment as they will have a bearing on traffic flows (which effect air quality) within the study area.
Kent Local Transport Plan	The current Kent LTP is LTP5 and covers the period from 2016 to 2031 ²² .	Local Transport Plan 5: 'Striking the Balance' brings together transport policies, looking at local schemes and issues as well as those at a countywide and national significance.	An HRA Report was undertaken as part of an Integrated Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) by Kent Council for the Kent Local Transport Plan 5 (LTP5) in July 2024²³. Of the 10 Policy Outcomes, none are considered to result in likely significant effects on the integrity of European sites. The report identified four road schemes where the conclusion of 'no likely significant effects' could not be confirmed due to the presence of potential impact pathways and an Appropriate Assessment (AA) is required. The four road schemes are: • Bluebell Hill A229 southbound widening • A2 Lydden Dualling • A256 Dualling

¹⁹ Southend-on-Sea Borough Council (2021) Southend-on-Sea New Local Plan – Refining the Plan options. Available at: <https://localplan.southend.gov.uk/local-plan-refining-plan-options-pdf> [Date Accessed: 16/06/25].

²¹ Medway Council (2011). Medway Local Transport Plan 2011-2026. Moving forward together. Available at: https://www.medway.gov.uk/downloads/file/1995/local_transport_plan_2011-2026 [Date Accessed: 16/06/25].

²² Kent County Council. July 2024. Local Transport Plan 5. Striking the Balance. Available at: <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/roads-paths-and-transport-policies/striking-the-balance-our-local-transport-plan> [Date accessed: 16/06/25].

²³ AECOM (2024). Local Transport Plan. Report to Inform Habitats Regulations Assessment. Kent County Council. Available at: https://www.kent.gov.uk/data/assets/pdf_file/0009/174753/LTP5-Habitats-Regulation-Assessment.pdf [Date accessed: 16/06/25].

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
			- Sittingbourne Southern Relief Road The report concludes that four European sites required an AA at the LTP5 level, with those relevant to Medway being the North Downs Woodlands SAC and the Swale SPA/Ramsar. The HRA recommended the following wording in regard to the four road schemes: - Bluebell Hill A229 Southbound Widening: A full HRA is required for any planning application. Updated air quality modelling is needed. Mitigation measures must be implemented based on the outcome of the air quality modelling. - A2 Lydden Dualling: A full HRA is required for any planning application. Updated air quality modelling is needed. Mitigation measures must be implemented based on the outcome of the air quality modelling. - A256 Dualling: A full project-level HRA must be produced before the scheme can be consented - The insertion of the wording would allow the conclusion that the Kent LTP5 will have no adverse effects on the integrity of any European sites. Policies set out in LTP5 will be considered in the Medway HRA in-combination assessment in terms of their ability to encourage a modal shift from the private car and positive impacts upon air quality.
Kent Minerals and Waste Local Plan	The Kent Minerals and Waste Local Plan (MWLP) was adopted by the County	The updated MWLP is required to enable the plan to address the minerals and waste requirements of Kent for the period 2023-2038 and will	An HRA was undertaken by Kent County Council to address any policy changes within the KMWLP 2023-2038²⁵. Based on the policy text included in the draft Minerals and Waste Local Plan, the HRA concluded that it was possible to screen out policies with

²⁵ Kent County Council. Habitats Regulations Assessment (HRA) Kent Minerals and Waste Local Plan Update 2023-2038. Available at: https://ehq-production-europe.s3.eu-west-1.amazonaws.com/541c1c03e01bf1b5bf371da4bac9be87d5ac6b16/original/1666183129/fd55d6263d90672344e67c43a570c6ae_Habitats_Regulations_Assessment.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIJHZMYNPA%2F20250616%2Feu-west-1%2Fs3%2Faws4_request&X-Amz-Date=20250616T082125Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=fe2755e113cb9ba596c24a8792a9548e1a5370aef0f9b587140d98d23866cd9 [Date accessed: 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
	Council in September 2020 ²⁴ .	replace the previously adopted MWLP in 2016. The Plan provides a blueprint for ensuring that Kent's waste is managed, and minerals supplied in such a way that best supports the needs of communities, businesses and the environment for the next generation. It aims to ensure that Kent's minerals are used wisely and that there will be enough to supply the needs of Kent until 2038.	the exception of Policy CSW17, as being unlikely to result in significant effects on European sites. The APP of Policy CSW17 concluded that there is risk of potential adverse effects on the integrity of European sites in the Dungeness peninsula, identified as a result of air pollution resulting from cumulative and in combination vehicle movements. The in-combination effect of the KMWLP on air will be addressed in the HRA.
South East Water. Water Resources Management Plan 2025 to 2075 ²⁶	WRMP24 published.	Sets out how SEW plan to secure water supplies from 2025 to 2075. The long-term forecast shows there is insufficient water available to meet demand, and therefore there is a risk of not meeting supply. Therefore, the WRMP sets out a range of demand management measures and new water supply options that could meet that shortfall in available water.	The key relevant outputs of the WRMP are as follows: • For the purposes of water resource planning, the South East Water supply area is divided into eight Water Resource Zones. • A small area to the south of the Medway administrative area falls within WRZ6 (Maidstone). • A new groundwater source, through a licence trade near Maidstone by 2040. • Water supplies are largely sourced from groundwater which are stored within underground aquifers across the South East. • South East Water has defined a preferred plan to address the future deficit of water supply. This plan includes: ○ Adopting a mix of demand management and supply side options

²⁴ Kent County Council (2020). Kent Minerals and Waste Local Plan 2013-2030. Available at: https://www.kent.gov.uk/_data/assets/pdf_file/0004/112585/Kent-Minerals-and-Waste-Local-Plan-2013-2030.pdf [Date accessed: 16/06/25]

²⁶ South East Water. Water Resources Management Plan 2025 to 2075. Available at: https://cdn.southeastwater.co.uk/SewHousehold/Documents/WRMP2023/Final/SEW_WRMP24_Technical_Overview_Document.pdf [Date Accessed: 04/02/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
			Addressing deficits in both dry year annual average and summer peak period for all WRZs across the plan period An HRA²⁷ was undertaken in parallel to the development of the WRMP and found that none of the WRMP preferred plan options would result in significant effects on European sites and no further assessment was required. This was subject to the appropriate resolution of the noted issues relating to CTR-22 (Canterbury to Maidstone new company transfer), which could result in habitat loss with regard to Blean Complex SAC and North Downs Woodlands SAC and would therefore not be taken forward. All other options were shown to have no adverse impacts on any European site. The impact of the Local Plan in-combination with the WRMP will be considered in the assessment of water quality and water resource impacts.
Southern Water. Draft Water Resource Management Plan ²⁸	Final Draft Water Resources Management Plan 2024 Technical Report (May 2025).	Southern Water propose a range of interventions including leakage reductions, significant demand management and new resource developments, and water trading across its Eastern, Central and Western areas of supply. The need for these is due to a combination of changes to abstraction licences, increasing demand, the effects of	An HRA was undertaken alongside the development of this Plan²⁹. This concluded that, for virtually all options, there will be no adverse effects alone or in combination that cannot be reliably avoided through scheme design or mitigated with measures that are known to be available, achievable and likely to be effective at the project-level. These options are not of a scale or type that would ensure that adverse effects were unavoidable irrespective of how the option is delivered. Given the high-level nature of the WRMP, a number of minor residual adverse impacts were identified at The Swale SPA/Ramsar and Thames

²⁷ South East Water. 2024. WRMP24 Habitats Regulations assessment report. Technical report. Available at: https://cdn.southeastwater.co.uk/SewHousehold/Documents/WRMP2023/Final/SEW_WRMP24_HRA_Report.pdf [Date Accessed: 16/06/25]

²⁸ Southern Water. Final Draft Water Resources Management Plan May 2025. Technical Report. Available at: <https://www.southernwater.co.uk/media/2p5o0k0c/technical-report.pdf> [Date Accessed: 16/06/25].

²⁹ Southern Water (2022). Final Water Resources Management Plan 2024 ANNEX 18 – HABITATS REGULATIONS ASSESSMENT OF THE WATER RESOURCE MANAGEMENT PLAN 2024. Available at: <https://www.southernwater.co.uk/media/b45jc3w1/annex-18-habitat-regulations-assessment-report.pdf> [Date Accessed: 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
		climate change, and expected further reductions in the water available for use from existing sources as a result of licence changes to protect and enhance the environment. The most significant driver for the proposed strategies in the WRMP is licence changes.	Estuary and Marshes SPA/Ramsar and Medway Estuary and Marshes SPA/Ramsar. However, it was concluded that these would not lead to adverse impacts on site integrity.
Medway Abstraction Licencing Strategy ³⁰	Published.	This strategy sets out how water resources are managed in Medway and how contribute to implementing the WFD objectives.	The CAMS indicates that the chalk aquifer supplies approximately 97% of the groundwater source and just over half of the total resource. Over 70% of total abstraction in this catchment is for public water supply, with over 90% from surface water sources. Of this almost half is abstracted from the Middle Medway and about a third from the River Eden. Existing and new licence abstractions are subject to the Habitats Regulations process. Water resources will be considered in the in-combination assessment.
South East Water Drought Plan 2022 - 2027 ³¹	Drought Plan published May 2022.	A Drought Plan sets out a framework for the water company to follow at times of drought and dry weather to maintain water supply.	These plans set out a number of drought / dry weather scenario actions which have been tested under different climatic conditions to show that supply can be maintained. These plans are aligned with the WRMP. The most recent Drought Plan (2022) was supported by an HRA screening assessment which concluded that no Appropriate Assessment would be required due to the absence of hydrological connectivity between European sites and abstractions ³² .

³⁰ Environment Agency. 2013. Medway Abstraction Licencing Strategy. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289875/LIT_1995_61b7f5.pdf [Date Accessed: 16/06/25]

³¹ South East Water. May 2022. Drought Plan. Available at: <https://cdn.southeastwater.co.uk/Publications/Drought+Plan/Final+Drought+Plan+May+2022+-+Main+Report.pdf> [Date Accessed: 16/06/25]

³² South East Water. May 2022. Appendix M Habitats Regulations Assessment. Available at: <https://cdn.southeastwater.co.uk/Publications/Drought+Plan/Final+Drought+Plan+May+2022+-+Appendix+M+-+HRA+screening.pdf> [Date Accessed: 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
			The impact of the Medway Plan in-combination with the drought / dry weather plans will be considered in the assessment of water quality and water resource impacts.
Southern Water Drought Plan 2019. Technical Summary ³³	Drought Plan published 2019.	A Drought Plan sets out a framework for the water company to follow at times of drought and dry weather to maintain water supply.	A HRA was undertaken to support the Drought Plan³⁴. This HRA screened in LSEs at the following European sites (other European sites outside the scope of this HRA were also looked at) due to the Sheerness emergency desalination option: • Medway Estuary and Marshes SPA and Ramsar • Thames Estuary and Marshes SPA and Ramsar The subsequent Appropriate Assessment, taking account of mitigation measures, concluded no adverse impact on site integrity of this option on the above European sites. The impact of the Medway Plan in-combination with the drought plan will be considered in the assessment of water quality and water resource impacts.
Medway Estuary and Swale Shoreline Management Plan	Published 2010 ³⁵ .	A Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and	An HRA was conducted for the Medway Estuary and Swale SMP in 2010³⁶. The Appropriate Assessment concluded that, alone and in combination, the Managed Realignment within the Medway Estuary and Swale SMP would have an Adverse Effect on the integrity of the Medway Estuary and

³³ Southern Water. 2019. Drought Plan 2019. Technical Summary. Available at: <https://www.southernwater.co.uk/media/lswlt5np/final-drought-plan-technical-summary.pdf> [Date Accessed: 16/06/25]

³⁴ Southern Water. July 2019. Drought Plan 2019. Annex 11. Habitats Regulations Assessment. NTS. Available at: <https://www.southernwater.co.uk/media/ew2hggsi/annex-11-hra-report-part-1-stages-1-and-2.pdf> [Date Accessed: 16/06/25]

³⁵ Halcrow Group Ltd (2010). Medway Estuary and Swale Shoreline Management Plan. Available at: https://www.medway.gov.uk/downloads/file/303/medway_estuary_and_swale_shoreline_management_plan_2010 [Date Accessed: 16/06/25]

³⁶ Environment Agency (2007). Medway Estuary and Swale Shoreline Management Plan Appendix J Habitat Regulations Assessment. Available at: <https://environment.data.gov.uk/shoreline-planning/documents/SMP9%2FAppendix%20J-%20Habitats%20Regulations%20Assessment%20.pdf> [Date Accessed: 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
		natural environment in a sustainable manner. It covers an area from the upstream limit in Medway at Allington Lock Gate and a downstream limit in Medway at the boundary with the coast and junction with the Isle of Grain to South Foreland SMP. The SMP sets out the process by which losses (due to flood defences and coastal squeeze) and the gains (due to managed retreat) will be identified. The SMP focuses on a strategic level.	Marshes SPA/Ramsar and The Swale SPA/Ramsar network, through displacement of Grazing Marsh and Standing Water Habitats. This assessment therefore progressed to Stage 4 of the HRA process. It was concluded that the alternative 'Managed Realignment with Controlled Extent' was the least damaging alternative and was the approach the SMP adopted subject to the following conditions (detailed below). • Investigations (ecological survey and monitoring) to increase understanding of the site, its interest features and the conditions necessary to best maintain the site. • Investigations (geomorphological study) to increase the understanding of sediment flux and habitat change through sea level rise. • Informed mitigation. • Modification of the realignment extent to best manage the estuary and cause least adverse effect. Compensation provisions were developed in partnership with Natural England using best available information. Development (an in particular siting of allocations) will need to take into consideration the aims of this plan and this will be considered in the assessment of coastal squeeze.
Thames Estuary Plan 2100 (TE2100)	Published in 2023. ³⁷	This plan sets out how the Environment Agency is planning to manage tidal flood risk in the Thames Estuary until the year 2100.	The Medway HRA in-combination assessment will take into consideration this plan when assessing coastal squeeze impacts.

³⁷ Environment Agency. 2023. Thames Estuary 2100. Available at: <https://www.gov.uk/government/collections/thames-estuary-2100-te2100> [Date Accessed: 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
Isle of Grain to South Foreland Shoreline Management Plan Review	The review of the original North Kent Coast: Isle of Grain to Dover Harbour SMP (1996) was carried out following the guidance developed by the Department for Environment, Food and Rural Affairs (Defra) leading to this second generation SMP. The development of this 'open coast' SMP was carried out in close co-operation with the Medway Estuary and Swale SMP, sharing the same Client Steering Group³⁸. The Policy Options set out in the Plan were all adopted by the relevant Operating Authorities in the first half of 2008. Since then Defra has transferred all of its 'delivery' responsibilities to the Environment Agency (EA) under their Strategic	A Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner.	To support the development of the Isle of Grain to South Foreland Shoreline Management Plan (SMP), an HRA was conducted in March 2009³⁹. Following an Appropriate Assessment of the SMP it could not be concluded that there would be no adverse effects on The Swale SPA/Ramsar and Thames Estuary and Marshes SPA/Ramsar sites. This was caused by displacement of Grazing Marsh and Standing Water Habitat through Managed Realignment. Therefore, the assessment progressed onto stage four of the HRA. However, no alternatives were found to mitigate adverse effects on European designated sites. Compensation provisions were developed in partnership with Natural England using the best available information.

³⁸ Halcrow Group Limited (2010). Isle of Grain to South Foreland Shoreline Management Plan Review 2010
https://www.medway.gov.uk/downloads/file/284/isle_of_grain_to_south_foreland_smp_review_2010 [Date Accessed: 16/06/25]

³⁹ Halcrow Group Limited (2009). Habitat Regulations Assessment. Available at: <https://environment.data.gov.uk/shoreline-planning/documents/SMP10%2FAppendix%20J-%20Habitats%20Regulations%20Assessment.pdf> [Date Accessed 16/06/25]

Plans and projects	Status	Summary of plan/project aspects which may act in-combination with Local Plan to cause an LSE	Review of HRA data and summary of potential in-combination LSE
	Overview role, which came into effect in April 2008.		
Lower Thames Crossing	LTC has no planning status to date.	National Highways submitted their first planning application in 2020 and resubmitted in 2022 for consent to build the proposed Lower Thames Crossing (LTC). The LTC would provide a new road to link Kent and Essex with a new tunnel beneath the River Thames. The LTC's proposed 'Order Limits' (i.e. development boundary) is adjacent to the Medway administrative boundary.	This project is a Nationally Significant Infrastructure Project (NSIP), with the potential to have alone adverse effects upon one or more European designated site. The traffic modelling undertaken for the MLP for the Do Something scenario includes the LTC. This traffic data has informed the assessment of air quality impacts in the HRA process and ensures a robust approach to the in-combination assessment.

Appendix B: European site conservation objectives, qualifying features, threats and pressures

Medway Estuary and Marshes SPA¹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying features:

A046a *Branta bernicla bernicla*; Dark-bellied Brent Goose (Non-breeding)

A048 *Tadorna tadorna*; Common Shelduck (Non-breeding)

A054 *Anas acuta*; Northern Pintail (Non-breeding)

A132 *Recurvirostra avosetta*; Pied Avocet (Breeding)

A132 *Recurvirostra avosetta*; Pied Avocet (Non-breeding)

A137 *Charadrius hiaticula*; Ringed Plover (Non-breeding)

A141 *Pluvialis squatarola*; Grey Plover (Non-breeding)

A143 *Calidris canutus*; Red Knot (Non-breeding)

A149 *Calidris alpina alpina*; Dunlin (Non-breeding)

A162 *Tringa totanus*; Common Redshank (Non-breeding)

A195 *Sterna albifrons*; Little Tern (Breeding)

Waterbird assemblage

Breeding bird assemblage

Waterbird assemblage includes:

Medway Estuary and Marshes SPA is one of the key estuaries in the UK for wintering wildfowl and waders. The site qualifies under article 4.2 of the Directive (79/409/EEC) as it is used regularly by over 20,000 waterbirds (waterbirds as defined by the Ramsar Convention) in any season^{2,3}. At the time of classification, the site supported internationally or nationally important wintering populations of the following migratory waterfowl Dark-bellied Brent Geese (*Branta bernicla bernicla*), Shelduck (*Tadorna tadorna*), Wigeon (*Anas penelope*), Teal (*Anas crecca*), Pintail (*Anas acuta*), Ringed Plover (*Charadrius hiaticula*), Grey Plover (*Pluvialis squatarola*), Knot (*Calidris canutus*), Great Crested Grebe (*Podiceps cristatus*), Shoveler (*Anas clypeata*), Dunlin (*Calidris alpina*), Black-tailed Godwit (*Limosa limosa islandica*), Oyster Catcher (*Haematopus*

¹ Natural England (2019) Medway Estuary & Marshes SPA Conservation Objectives Available at: <http://publications.naturalengland.org.uk/publication/6672791487119360> [Date Accessed: 15/05/25].

² English Nature. 2001. Medway Estuary and Marshes (Kent): SPA citation (UK9012031): English Nature.

³ English Nature. 2003. Swale and Medway European Marine site. English Nature's advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994.: English Nature.

Medway Estuary and Marshes SPA¹

ostralegus), Curlew (*Numenius arquata*) and Redshank (*Tringa totanus*), Greenshank (*Tringa nebularia*) and Turnstone (*Arenaria interpres*)⁴.

Breeding bird assemblage includes:

The Medway Estuary and Marshes SPA qualifies under Article 4.2 by supporting regularly in summer a diverse assemblage of breeding migratory waterfowl including Oystercatcher (*Haematopus ostralegus*), Lapwing (*Vanellus vanellus*), Ringed Plover (*Charadrius hiaticula*), Redshank (*Tringa totanus*), Shelduck (*Tadorna tadorna*), Mallard (*Anas platyrhynchos*), Teal (*Anas crecca*), Shoveler (*Anas clypeata*), Pochard (*Aythya ferina*) and Common Tern (*Sterna hirundo*)⁵. The Chetney Peninsula is among the most important wildfowl breeding areas in Kent. Breeding species include Shelduck, Shoveler, Avocet (*Recurvirostra avosetta*), Pochard (*Aythya ferina*), Mute Swan (*Cygnus olor*), Tufted Duck (*Aythya fuligula*), Teal (*Anas crecca*) and Gadwall (*Anas strepera*)⁶.

Threats and pressures at European site which may be affected by the MLP⁷:

- Public Access / Disturbance
- Air Pollution – Nitrogen deposition
- Coastal Squeeze

⁴ English Nature. 2001. Medway Estuary and Marshes (Kent): SPA citation (UK9012031): English Nature.

⁵ English Nature. 2001. Medway Estuary and Marshes (Kent): SPA citation (UK9012031): English Nature.

⁶ Gordon, A. 2013. Nor Marsh and Motney Hill RSPB Management Plan 2008-2013 update.: Royal Society for the Protection of Birds.

⁷ Natural England (2014) Site Improvement Plan Greater Thames Complex Available at: <https://publications.naturalengland.org.uk/publication/627073746783436> [Date Accessed 15/05/25].

Medway Estuary and Marshes Ramsar⁸

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	The site supports a number of species of rare plants and animals. The site holds several nationally scarce plants, including Sea Barley <i>Hordeum marinum</i>, Curved Hard-grass <i>Parapholis incurva</i>, Annual Beard-grass <i>Polypogon monspeliensis</i>, Borrer's Saltmarsh-grass <i>Puccinellia fasciculata</i>, Slender Hare's-ear <i>Bupleurum tenuissimum</i>, Sea Clover <i>Trifolium squamosum</i>, Saltmarsh Goose-foot <i>Chenopodium chenopodioides</i>, Golden Samphire <i>Inula crithmoides</i>, Perennial Glasswort <i>Sarcocornia perennis</i> and One-flowered Glasswort <i>Salicornia pusilla</i>. A total of at least twelve British Red Data Book species of wetland invertebrates have been recorded on the site. These include a ground beetle <i>Polistichus connexus</i>, a fly <i>Cephalops perspicuus</i>, a dancefly <i>Poecilobothrus ducalis</i>, a fly <i>Anagnota collini</i>, a weevil <i>Baris scolopacea</i>, a water beetle <i>Berosus spinosus</i>, a beetle <i>Malachius vulneratus</i>, a rove beetle <i>Philonthus punctus</i>, the ground lackey moth <i>Malacosoma castrensis</i>, a horsefly <i>Atylotus latistriatus</i>, a fly <i>Campsicnemus magius</i>, a soldier beetle, <i>Cantharis fusca</i>, and a crane fly <i>Limonia danica</i>. A significant number of non-wetland British Red Data Book species also occur.
5	Assemblages of international importance: Species with peak counts in winter: 47637 waterfowl (5-year peak mean 1998/99-2002/2003)
6	Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: - Grey Plover, <i>Pluvialis squatarola</i>, E Atlantic/W Africa -wintering 3103 individuals, representing an average of 1.2% of the population (5-year peak mean 1998/9-2002/3) - Common Redshank, <i>Tringa totanus totanus</i>, 3709 individuals, representing an average of 1.4% of the population (5-year peak mean 1998/9-2002/3) Species with peak counts in winter: - Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i>, 2575 individuals, representing an average of 1.1% of the population (5-year peak mean 1998/9-2002/3) - Common Shelduck, <i>Tadorna tadorna</i>, NW Europe 2627 individuals, representing an average of 3.3% of the GB population (5-year peak mean 1998/9-2002/3) - Northern Pintail, <i>Anas acuta</i>, NW Europe 1118 individuals, representing an average of 1.8% of the population (5-year peak mean 1998/9-2002/3) - Ringed Plover, <i>Charadrius hiaticula</i>, Europe/Northwest Africa 540 individuals, representing an average of 1.6% of the GB population (5-year peak mean 1998/9- 2002/3)

⁸ JNCC (2008) Information Sheet on Medway Estuary and Marshes Ramsar Wetlands Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11040.pdf> [Date Accessed: 15/05/25].

Ramsar Criterion	Justification for the application of each criterion
	• Red Knot, <i>Calidris canutus islandica</i>, W & Southern Africa (wintering) 3021 individuals, representing an average of 1% of the GB population (5-year peak mean 1998/9- 2002/3) • Dunlin, <i>Calidris alpina alpina</i>, W Siberia/W Europe 8263 individuals, representing an average of 1.4% of the GB population (5-year peak mean 1998/9-2002/3) Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in spring/autumn: • Black-tailed Godwit, <i>Limosa limosa islandica</i>, Iceland/W Europe 721 individuals, representing an average of 2% of the population (5-year peak mean 1998/9- 2002/3) Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually.

Threats and Pressures at European site which may be affected by the MLP⁹:

- Water diversion for irrigation/domestic/industrial use
- Eutrophication
- Recreational/tourism disturbance

9 JNCC (2008) Information Sheet on Ramsar Wetlands Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11040.pdf> [Date accessed 31/01/24].

Thames Estuary and Marshes SPA¹⁰

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying features:

A082 *Circus cyaneus*; Hen Harrier (Non-breeding)
A132 *Recurvirostra avosetta*; Pied Avocet (Non-breeding)
A137 *Charadrius hiaticula*; Ringed Plover (Non-breeding)
A141 *Pluvialis squatarola*; Grey Plover (Non-breeding)
A143 *Calidris canutus*; Red Knot (Non-breeding)
A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
A156 *Limosa limosa islandica*; Black-tailed Godwit (Non-breeding)
A162 *Tringa totanus*; Common Redshank (Non-breeding)
Waterbird assemblage

Threats and pressures at European site which may be affected by the Plan¹¹:

- Public Access / Disturbance
- Air Pollution – Nitrogen deposition

Waterbird Assemblage includes:

The site regularly supports large numbers of birds, with the 1993/4-1998/9 wintering population being 75,019, which supported classification of the SPA¹². The citation lists the following species as regularly occurring on the site in non-qualifying numbers. Passage and wintering Bewick's Swan *Cygnus columbianus bewickii*, Golden Plover *Pluvialis apricaria* and Ruff *Philomachus pugnax*. Also nationally important populations of Shelduck *Tadorna tadorna*, Teal *Anas crecca*, Pintail *Anas acuta*, Gadwall *Anas strepera*, Shoveler *Anas clypeata*, Tufted Duck *Aythya fuligula* and Pochard *Aythya farina*¹³.

¹⁰ Natural England (2019) Thames Estuary & Marshes SPA Conservation Objectives Available at: <https://publications.naturalengland.org.uk/publication/4698344811134976> [Date Accessed: 15/05/25].

¹¹ Natural England (2014) Site Improvement Plan Greater Thames Complex Available at: <https://publications.naturalengland.org.uk/publication/6270737467834368> [Date Accessed 15/05/25].

¹² English Nature (EN). 2000. Directive 79/409 on the conservation of wild birds: Special Protection Area - Thames Estuary and Marshes Citation.

¹³ English Nature (EN). 2000. Directive 79/409 on the conservation of wild birds: Special Protection Area - Thames Estuary and Marshes Citation.

Thames Estuary and Marshes Ramsar¹⁴

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	The site supports one endangered plant species and at least 14 nationally scarce plants of wetland habitats. The site also supports more than 20 British Red Data Book invertebrates
5	Assemblages of international importance: Species with peak counts in winter: 45118 waterfowl (5-year peak mean 1998/99-2002/2003)
6	Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: - Ringed Plover, <i>Charadrius hiaticula</i>, Europe/Northwest Africa 595 individuals, representing an average of 1.8% of the GB population (5-year peak mean 1998/9- 2002/3) - Black-tailed Godwit, <i>Limosa limosa islandica</i>, Iceland/W Europe 1640 individuals, representing an average of 4.6% of the population (5-year peak mean 1998/9-2002/3) Species with peak counts in winter: - Grey Plover, <i>Pluvialis squatarola</i>, E Atlantic/W Africa -wintering 1643 individuals, representing an average of 3.1% of the GB population (5-year peak mean 1998/9-2002/3) - Red Knot, <i>Calidris canutus islandica</i>, W & Southern Africa (wintering) 7279 individuals, representing an average of 1.6% of the population (5-year peak mean 1998/9-2002/3) - Dunlin, <i>Calidris alpina alpina</i>, W Siberia/W Europe 15171 individuals, representing an average of 1.1% of the population (5-year peak mean 1998/9-2002/3) - Common Redshank, <i>Tringa totanus totanus</i>, 1178 individuals, representing an average of 1% of the GB population (5-year peak mean 1998/9- 2002/3) Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the annual Wetland Bird Survey report.

Threats and Pressures at European site which may be affected by the MLP¹⁵:

- Water diversion for irrigation/domestic/industrial use
- Eutrophication
- Recreational/tourism disturbance

¹⁴ JNCC. (2008) Information Sheet on Ramsar Wetlands (RIS). Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11069.pdf> [Date Accessed: 15/05/25].

¹⁵ JNCC. (2008) Information Sheet on Ramsar Wetlands (RIS). Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11040.pdf> [Date Accessed: 15/05/25].

The Swale SPA¹⁶

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying features:

A046a *Branta bernicla bernicla*; Dark-bellied Brent Goose (Non-breeding)

A149 *Calidris alpina alpina*; Dunlin (Non-breeding)

Breeding bird assemblage

Waterbird assemblage

Breeding bird assemblage includes:

The grazing marshes support a typical assemblage of breeding species including Shelduck (*Tadorna tadorna*), Mallard (*Anas platyrhynchos*), Moorhen (*Gallinula chloropus*), Coot (*Fulica atra*), Lapwing (*Vanellus vanellus*), Redshank (*Tringa totanus*), Reed Warbler (*Acrocerphalus scirpaceus*) and Reed Bunting (*Emberiza schenicolus*)¹⁷.

Waterbird assemblage includes:

The Swale SPA is one of the key estuaries in the UK for wintering wildfowl and waders. The site qualifies under article 4.2 of the Directive¹⁸ as it is used regularly by over 20,000 waterbirds (waterbirds as defined by the Ramsar Convention) in any season. The wintering waterbird assemblage includes all the internationally important regularly occurring migratory species as well as species present in nationally important numbers or species whose populations exceed 2,000 individuals^{19,20}. In addition to Dunlin and Dark-bellied Brent Geese the mudflats also support smaller numbers of wintering migratory waterfowl including Oyster Catcher (*Haematopus ostralegus*), Ringed Plover (*Charadrius hiaticula*), Grey Plover (*Pluvialis squatarola*), Curlew (*Numenius arquata*) and Redshank (*Tringa totanus*)²¹. The grazing marshes support internationally and nationally important numbers of several waterbirds including Shelduck (*Tadorna tadorna*), Wigeon (*Anas Penelope*), Teal (*Annas Creca*) and Curlew (*Numenius arquata*)²². Non-qualifying species of interest include

¹⁶ Natural England (2019) The Swale SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5745862701481984> [Date accessed 31/01/24].

¹⁷ English Nature. 1993. The Swale extensions (Kent): SPA citation (UK9012011): English Nature.

¹⁸ English Nature. 1993. The Swale extensions (Kent): SPA citation (UK9012011): English Nature

¹⁹ English Nature. 2003. Swale and Medway European Marine site. English Nature's advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994.: English Nature.

²⁰ English Nature. 1993. The Swale extensions (Kent): SPA citation (UK9012011): English Nature.

²¹ English Nature. 1993. The Swale extensions (Kent): SPA citation (UK9012011): English Nature.

²² English Nature. 1993. The Swale extensions (Kent): SPA citation (UK9012011): English Nature.

The Swale SPA¹⁶

the Short-eared Owl (*Asio flammeus*) (Annex I species) which occurred in non-breeding numbers of less than European importance (less than 1% of the GB population)^{23,24}.

Threats and pressures at European site which may be affected by the MLP²⁵:

- Public Access / Disturbance
- Air Pollution – Nitrogen deposition
- Coastal squeeze

²³ English Nature. 2003. Swale and Medway European Marine site. English Nature's advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994.: English Nature.

²⁴ English Nature. 1993. The Swale extensions (Kent): SPA citation (UK9012011): English Nature.

²⁵ Natural England (2014) Site Improvement Plan Greater Thames Complex Available at:
<https://publications.naturalengland.org.uk/publication/6270737467834368> [Date Accessed: 15/05/25].

The Swale Ramsar²⁶

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	The site supports nationally scarce plants and at least seven British Red data book invertebrates
5	Assemblages of international importance: Species with peak counts in winter: 77501 waterfowl (5-year peak mean 1998/99-2002/2003)
6	Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: - Common Redshank, <i>Tringa totanus totanus</i>, 1712 individuals, representing an average of 1.4% of the GB population (5-year peak mean 1998/9-2002/3) Species with peak counts in winter: - Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i>, 1633 individuals, representing an average of 1.6% of the GB population (5-year peak mean 1998/9-2002/3) - Grey Plover, <i>Pluvialis squatarola</i>, E Atlantic/W Africa -wintering 2098 individuals, representing an average of 3.9% of the GB population (5-year peak mean 1998/9-2002/3) Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in spring/autumn: - Ringed Plover, <i>Charadrius hiaticula</i>, Europe/Northwest Africa 917 individuals, representing an average of 1.2% of the population (5-year peak mean 1998/9- 2002/3) Species with peak counts in winter: - Eurasian Wigeon, <i>Anas penelope</i>, NW Europe 15296 individuals, representing an average of 1% of the population (5-year peak mean 1998/9- 2002/3) - Northern Pintail, <i>Anas acuta</i>, NW Europe 763 individuals, representing an average of 1.2% of the population (5-year peak mean 1998/9- 2002/3) - Northern Shoveler, <i>Anas clypeata</i>, NW & C Europe 483 individuals, representing an average of 1.2% of the population (5-year peak mean 1998/9- 2002/3) - Black-tailed Godwit, <i>Limosa limosa islandica</i>, Iceland/W Europe 1504 individuals, representing an average of 4.2% of the population (5-year peak mean 1998/9-2002/3) Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually

²⁶ Natural England (2005) Information Sheet on Ramsar Wetlands: The Swale Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11071.pdf> [Date Accessed 31/01/24].

Threats and Pressures at European site which may be affected by the MLP²⁷:

None identified within The Swale Ramsar Information Sheet.

North Downs Woodlands SAC²⁸

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of qualifying natural habitat
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which the qualifying natural habitats rely

Qualifying features:

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco- Brometalia*);
Dry grasslands and scrublands on chalk or limestone

H9130. *Asperulo-Fagetum* Beech forests; Beech forests on neutral to rich soils

H91J0. *Taxus baccata* woods of the British Isles; Yew-dominated woodland*

*Priority natural habitats or species.

Threats and pressures at European site which may be affected by the MLP²⁹:

- Public Access / Disturbance
- Air Pollution – Nitrogen deposition

²⁷ Natural England (2005) Information Sheet on Ramsar Wetlands: The Swale Available at:
<https://rsis.ramsar.org/RISapp/files/RISrep/GB299RIS.pdf> [Date Accessed: 15/05/25].

²⁸ Natural England (2018) North Downs Woodlands SAC Conservation Objectives Available at:
<http://publications.naturalengland.org.uk/publication/5717001544663040> [Date Accessed: 15/05/25].

²⁹ Natural England (2015) Site Improvement Plan North Downs Woodlands Available at:
<http://publications.naturalengland.org.uk/publication/6363401429188608> [Date Accessed: 15/05/25].

Queendown Warren SAC³⁰

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of qualifying natural habitat
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which the qualifying natural habitats rely

Qualifying features:

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco Brometalia*) (important orchid sites); Dry grasslands and scrublands on chalk or limestone (important orchid sites) *

* Denotes a priority natural habitat or species

Threats and pressures at European site which may be affected by the MLP³¹:

- Air Pollution – Nitrogen deposition
- Habitat Fragmentation

Peters Pit SAC³²

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying features:

S1166. *Triturus cristatus*; Great Crested Newt

Threats and pressures at European site which may be affected by the MLP³³:

No current issues affecting the Natura 2000 feature(s) have been identified on this site.

³⁰ Natural England (2018) Queendown Warren SAC Conservation Objectives Available at: <http://publications.naturalengland.org.uk/publication/5977332179271680> [Date Accessed: 15/05/25].

³¹ Natural England (2015) Site Improvement Plan: Queendown Warren Available at: <http://publications.naturalengland.org.uk/publication/4943746697265152> [Date Accessed: 15/05/25].

³² Natural England (2018) Peter's Pit SAC Conservation Objectives Available at: <http://publications.naturalengland.org.uk/publication/4817478370721792> [Date Accessed: 15/05/25].

³³ Natural England (2018) Peter's Pit SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/5643865918799872> [Date Accessed: 15/05/25].

Appendix C: Policies Screening Summary to inform Test of Likely Significance

The Medway Local Plan (MLP) policies (**Appendix C**), and allocations (**Appendix D**) have been screened using the DTA HRA pre-screening categories¹ presented in **Table C.1**.

Table C.1: *Assessment and reasoning categories from Part F of the DTA Handbook*

Assessment and reasoning categories from Chapter F of The Habitats Regulations Assessment Handbook (DTA Publications, 2013):

- A. General statements of policy / general aspirations.
- B. Policies listing general criteria for testing the acceptability / sustainability of proposals.
- C. Proposal referred to but not proposed by the plan.
- D. General plan-wide environmental protection / site safeguarding / threshold policies
- E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.
- F. Policies or proposals that cannot lead to development or other change.
- G. Policies or proposals that could not have any conceivable or adverse effect on a site.
- H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects).
- I. Policies or proposals with a likely significant effect on a site alone.
- J. Policies or proposals unlikely to have a significant effect alone.
- K. Policies or proposals unlikely to have a significant effect either alone or in combination.
- L. Policies or proposals which might be likely to have a significant effect in combination.
- M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.

¹ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (September) (2013) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

Vision and Spatial Objectives

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
n/a	A Vision for Medway in 2041	This policy sets out the vision for Medway. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category A	Screen out
n/a	Strategic Objectives	The strategic objectives define the aims of the MLP across a range of topics. They are high level and do not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category A	Screen out
n/a	Spatial Development Strategy	This policy sets out the spatial strategy for development in Medway. Whilst no details regarding development are identified within the policy, it does support waterfront redevelopment and development in other areas of the Plan area. A number of waterfront areas in Medway are located within, or close to, the IRZ SSSI associated with the North Kent coastal designations ² , or adjacent to priority habitat associated with them. It is possible therefore that there may be direct or indirect recreation and urbanisation LSEs upon either these designations or associated areas of FLL. This will be addressed in further detail in the HRA process.	Category L	Screen in

² Including: Medway Estuary and Marshes SPA, Medway Estuary and Marshes Ramsar, Thames Estuary and Marshes SPA, Thames Estuary and Marshes Ramsar, The Swale SPA and The Swale Ramsar.

Natural Environment

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy S1	Planning for Climate Change	This policy sets out requirements for new development to plan for climate change in order to provide positive plan wide environmental protection. This policy does not allocate development specifically or trigger any change which would have an adverse impact on site integrity.	Category F	Screen out
Policy S2	Conservation and Enhancement of the Natural Environment	This policy provides plan-wide environmental protection to international, national and locally designated wildlife sites. It provides proposals intended to avoid or reduce harmful effects on European sites and has therefore been screened into the HRA process to ensure compliance with case law around consideration of mitigation measures (People Over Wind).	Category M	Screen in
Policy S3	North Kent Estuary and Marshes Designated Sites	This policy provides plan-wide environmental protection to the North Kent coastal designations. It provides proposals intended to avoid or reduce harmful effects on European sites and has therefore been screened into the HRA process to ensure compliance with case law around consideration of mitigation measures (People Over Wind).	Category M	Screen in
Policy S4	Landscape Protection and Enhancement	This policy provides plan-wide environmental protection to landscape features. This policy does not allocate development specifically or trigger any change which would have an adverse impact on site integrity.	Category D	Screen out
Policy S5	Securing Strong Green and Blue Infrastructure	This policy is positive in nature and will protect the network of green infrastructure across Medway. This policy also seeks to 'promote and enhance the public rights of way network, including national trails, long distance paths and the wider footpath network, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside, and other cross border links'. The promotion of such links has the potential to introduce recreation into new areas. Where introduced in sensitive locations, this policy would have the potential to increase recreational pressure at European sites when considered cumulatively with other public access and disturbance effects which may result from local plan growth. Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.	Category L	Screen in
Policy S6	Kent Downs National Landscape	This policy provides plan-wide environmental protection to the Kent Downs National Landscape.	Category D	Screen out
Policy DM1	Flood and Water Management	This policy sets out requirements for new development to reduce flood risk, promote water efficiency measures, and protect and enhance water quality.	Category D	Screen out

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		This policy does not trigger development but provides positive plan wide environmental protection for the water environment.		
Policy DM2	Contaminated Land	This policy provides plan-wide environmental protection in relation to contaminated land.	Category D	Screen out
Policy DM3	Air Quality	This policy provides plan-wide environmental protection in relation to the protection of air quality, both in terms of habitats and human health.	Category D	Screen out
Policy DM4	Noise and Light Pollution	This policy provides plan-wide environmental protection in relation to the protection of noise and lighting, both in terms of habitats and other sensitive landscapes.	Category D	Screen out
Policy S7	Green Belt Policy	This policy sets out requirements in terms of green belt in relation to new development. It will not trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out

Built Environment

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy T1	High Quality Design and Amenity	This policy sets out design requirements for new proposals. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM5	Housing Design	This policy sets out standards for housing design at new development. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM6	Sustainable Design and Construction	This policy sets out standards for sustainable design and construction of new development. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM7	Shopfront Design and Security	This policy sets out requirements for development of shop frontages. This policy does not trigger development and would have no LSE upon any European site alone or in-combination.	Category F	Screen out
Policy DM8	Advertisements	This policy sets out requirements for advertisements. This policy does not trigger development and would have no LSE upon any European site alone or in-combination.	Category F	Screen out
Policy S8	Historic Environment	This policy sets out commitments to the conservation, enhancement and enjoyment of the historic environment. This policy does not trigger development but provides positive plan wide environmental protection for the historical environment.	Category F	Screen out
Policy DM9	Heritage Assets	This policy sets out requirements for new development to protect heritage assets. This policy does not trigger development but provides positive plan wide environmental protection for the historical environment.	Category D	Screen out
Policy S9	Star Hill to Sun Pier	This policy sets out requirements for planning applications within the Star Hill to Sun Pier Development Heritage Zone area which must be compliant with the Framework to ensure protection of heritage and conservational interest features. This policy does not trigger development but provides positive plan wide environmental protection for the historical environment.	Category D	Screen out

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy DM10	Conservation Areas	This policy sets out requirements for new development to protect and enhance Conservation Areas. This policy does not trigger development but provides positive plan wide environmental protection for the historical environment.	Category D	Screen out
Policy DM11	Scheduled Monuments and Archaeological Sites	This policy sets out requirements for new development to protect Scheduled Monuments and archaeological sites. This policy does not trigger development but provides positive plan wide environmental protection for the historical environment.	Category D	Screen out

Housing

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy T2	Housing Mix	This policy sets out development requirements in respect of housing mix. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T3	Affordable Housing	This policy sets out development requirements in respect of affordable housing. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T4	Supported Housing, Nursing Homes and Older Person Accommodation	This policy sets out development requirements in respect of supported housing nursing homes and old person accommodation. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T5	Student Accommodation	This policy sets out development requirements in respect of student accommodation. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T6	Mobile Home Parks	This policy sets out development requirements in respect of mobile home parks. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T7	Houseboats	This policy sets out the Council's commitment to manage provisions for houseboats. Given the presence of coastal / river designated European sites in proximity to existing houseboat sites, this policy may have potential likely significant effects at a European site when considered cumulatively with other development proposed within the MLP as follows: - Hydrology (water quality) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Recreational impacts – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar. - Urbanisation impacts - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Swale SPA and Ramsar.	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy T8	Houses of Multiple Occupation	This policy sets out development requirements in respect of HMO. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T9	Self-Build and Custom Housebuilding	This policy sets out development requirements in respect of self-build and custom build housing and identifies a site allocation (AS2 - assessed in Appendix C). This policy supports development which has the potential for LSEs as follows: • Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. • Recreational impacts – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar and North Downs Woodlands SAC. • Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. • Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, Swale Estuary and Marshes and upon areas of FLL.	Category L	Screen in
Policy T10	Gypsy, Traveller & Travelling Showpeople	This policy sets out provisions for the protection and expansion of existing Gypsy, Traveller and Travelling Showpeople sites. It sets out the level of need, with existing sites noted. It also provides a set of development criteria that must be met for any new sites. This policy supports development which has the potential for LSEs as follows: • Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. • Recreational impacts – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar and North Downs Woodlands SAC. • Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. • Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy T11	Small Sites and SME Housebuilders	This policy sets out provisions for development of small sites and SME housebuilders. It does not provide locational specific information in respect of new sites or any information regarding the quantum of development for new sites. However, it does set out development criteria that must be met for any new sites. It does not therefore directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out

Economic development

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy S10	Economic Strategy	This policy sets out broad areas for the direction of employment development in Medway. It notes that office development will be focused towards the main town centres and key regeneration opportunity areas, industry and warehouse uses on the periphery of Medway and larger scale Net Zero Carbon Energy generating uses and port using facilities to be directed to the Hoo Peninsula to sites at Kingsnorth and Grain. Development close to North Kent coastal designations has the potential for LSEs listed below alone and will be screened in for consideration in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category I	Screen in
Policy S11	Existing Employment Provision	This policy sets out provisions for safeguarding Existing Employment Areas and supports development at these locations where they meet listed criteria. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination. Development close to North Kent coastal designations has the potential for LSEs listed below alone and will be screened in for consideration in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category I	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy S12	New Employment Sites	This policy sets out allocation locations for the promotion of new employment sites. This policy triggers development and change with the potential for the following LSEs at European sites alone which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category I	Screen in
Policy T12	Learning and Skills Development	This policy sets out development which the Council will support in terms of learning and skills development. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T13	Tourism, Culture and Visitor Accommodation	This policy sets out criteria for new tourism, culture and visitor accommodation employment development. It does not however provide locational or quantum information. This policy sets out criteria for development but does not in itself directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy S14	Supporting Medway's Culture and Creative Industries	This policy sets out development proposals which will be supported to enhance continued growth of cultural infrastructure across Medway. No location or other details regarding development are identified within the policy. It does not therefore directly trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T14	Rural Economy	This policy sets out criteria for employment development in rural locations. It does not however provide locational or quantum information. This policy does therefore not in itself directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out

Retail and Town Centres

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy S15	Town Centres	This policy sets out requirements for development in town centres. It does not however provide locational or quantum information. This policy does therefore not in itself directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy S16	Hierarchy of Centres	This policy details the hierarchy of centres based on their role, function and scale. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T15	Sequential Assessment	This policy sets out requirements in relation to sequential assessment for retail development where not in accordance with the development plan. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T16	Ancillary Development	This policy sets out criteria for ancillary development for retail and town centres. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T17	Impact Assessment	This policy sets out impact assessment criteria for proposals that seek to provide or expand retail and leisure uses in edge or out of centre locations. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy S17	Chatham Town Centre	This policy sets out criteria which development in Chatham Town Centre must meet. It also sets out a number of opportunity sites for development. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.		
Policy S18	Rochester District Centre	This policy sets out criteria which development in Rochester District Centre must meet. It also sets out a number of opportunities for development. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in
Policy S19	Gillingham District Centre	This policy sets out criteria which development in Gillingham District Centre must meet. It also sets out a number of opportunities for development. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in
Policy S20	Strood District Centre	This policy sets out criteria which development in Strood District Centre must meet. It also sets out opportunity areas for development. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered.	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		- Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.		
Policy S21	Rainham District Centre	This policy sets out criteria which development in Rainham District Centre must meet. It also sets out a number of opportunities for development including cycle links and green spaces. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in
Policy S22	Hoo Peninsula	This policy sets out criteria which development in Hoo St Werburgh must meet. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy S23	Hempstead Valley District Centre	This policy sets out criteria for retail development in Hempstead Valley District Centre. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar.	Category L	Screen in
Policy DM12	Local and Rural Centres	This policy sets out criteria which development in local and rural centres must meet. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T18	Shopping Parades and Neighbourhood Centres	This policy sets out criteria which development at shopping parades and neighbourhood centres must meet. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T19	Meanwhile Uses	This policy sets out criteria which development defined as meanwhile/temporary/pop-up use must meet. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM13	Medway Valley Leisure Park	This policy sets out tests for development at Medway Valley Leisure Park. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM14	Dockside	This policy sets out tests for development at Dockside. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out

Transport

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
n/a	Vision for Access and Movement in Medway	This policy sets out the vision for access and movement in Medway. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category A	Screen out
Policy DM15	Monitoring and Managing Development	This policy sets requirements for new development to lower vehicle trip generation and contribution to transport mitigations. This policy does not trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T20	Riverside Path	This policy sets out aspiration for a new riverside path or boardwalk along the River Medway, where possible, tying in with the England Coastal Path. The River Medway (and route of the existing England Coastal Path) is located close to the Medway and Thames Estuary and Marshes SPA and Ramsar sites and areas of FLL habitat associated with these. The creation of waterfront walking routes may have a likely significant effect on the European sites through the introduction of increased recreational pressure at these designations when considered cumulatively with other recreational and urbanisation LSEs which may result from local plan growth. Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA and Ramsar.	Category L	Screen in
Policy DM16	Chatham Waters Line	This policy sets out the aspiration for a new active travel corridor along the Chatham Waters Line and also at Gillingham Riverside. Gillingham Riverside area is located close to the Medway and Thames Estuary and Marshes SPA and Ramsar sites and associated FLL. The creation of waterfront walking routes at this location may have a likely significant effect on the European sites through the introduction of increased recreational pressure at these designations when considered cumulatively with other recreational and urbanisation LSEs which may result from local plan growth. Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA and Ramsar.	Category L	Screen in
Policy DM17	Grain Branch Line	This policy safeguards land for the Grain Branch Line. Allocations for new development are assessed in Appendix C. As this is a safeguarding policy it does not trigger development directly. As such it would not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T21	Riverside Infrastructure	This policy safeguards riverside infrastructure and sets out requirements for new infrastructure. Due to the sensitive location of this infrastructure close to the Medway and Thames SPA and Ramsar sites and	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		potential associated areas of FLL, urbanisation effects are possible. This policy will therefore be screened in for further consideration in the HRA process.		
Policy T22	Marinas and Moorings	This policy safeguards marina and mooring infrastructure and sets out requirements for new infrastructure. Due to the sensitive location of this infrastructure close to the Medway and Thames SPA and Ramsar sites and potential associated areas of FLL, urbanisation effects are possible. This policy will therefore be screened in for further consideration in the HRA process.	Category L	Screen in
Policy T23	Aviation	This policy safeguards aviation facilities at Rochester Airport. This policy does not trigger development directly. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T24	Urban Logistics	This policy sets out requirements to resist loss of existing B8 use. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T25	User Hierarchy and Street Design	This policy sets out requirements in terms of user hierarchy and street design. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T26	Accessibility Standards	This policy sets out requirements for new development in terms of accessibility standards. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM18	Transport Assessments, Transport Statements and Travel Plans	This policy sets out the requirement for development proposals to be supported by a Transport Assessment, Transport Statement and/or a commitment to provide a Travel Plan. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM19	Vehicle Parking	This policy sets out parking requirements for new development. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM20	Cycle Parking and Storage	This policy sets out cycle parking and storage requirements for new development. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out

Health, Communities and Infrastructure

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy T27	Reducing Health Inequalities and Supporting Health and Wellbeing	This policy sets out requirements for new development to support health and wellbeing. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T28	Existing open space, outdoor sports and play spaces	This policy sets out the provisions for existing open space and playing pitches. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM21	New open space, outdoor sports and playing pitches	This policy sets out the requirements for new development in terms of open space and playing pitches. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T29	Community and Cultural Facilities	This policy sets out the provisions for safeguarding community and cultural facilities. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy S24	Infrastructure Delivery	This policy sets out expectations for development to deliver appropriate infrastructure and circumstances where planning permission would be granted. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy DM22	Digital Communications	This policy sets out requirements for new development in relation to digital communications. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out

Minerals Supply

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
n/a	Vision for Minerals Supply	This policy sets out the vision for minerals supply in Medway. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category A	Screen out
Policy T30	Safeguarding Mineral Resource	This policy sets out requirements to safeguard mineral resource. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T31	Safeguarding of Existing Mineral Supply Infrastructure	This policy sets out requirements to safeguard existing mineral supply infrastructure. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T32	Supply of Recycled and Secondary Aggregates	This policy sets out requirements for additional capacity for secondary and recycled aggregate production and locations where this will be supported. Proposals for additional capacity have the potential for the following LSEs at European sites alone which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category I	Screen in
Policy T33	Extraction of Land Won Minerals	This policy sets out provisions for where extraction of land won minerals will be supported. Proposals for extraction of land won minerals have the potential for the following LSEs at European sites alone which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered.	Category I	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		- Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.		

Waste Management

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
n/a	Vision for Waste Management	This policy sets out the vision for waste management. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category A	Screen out
Policy DM23	Waste Prevention	This policy sets out requirements for waste prevention at new development. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T34	Safeguarding of Existing Waste Management Facilities	This policy sets out requirements to safeguard existing management facilities. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T35	Provision of Additional Waste Management Capacity	This policy sets out criteria for the development of additional waste management capacity. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out
Policy T36	Location of Waste Management Facilities	This policy specifies locations where waste management facilities may be considered. Proposals for additional waste facilities have the potential for the following LSEs at European sites which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in
Policy T37	Other Recovery	This policy provides criteria where energy from waste facilities will be supported. Proposals for energy from waste facilities have the potential for the following LSEs at European sites which will be considered in the HRA process:	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		- Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.		
Policy T38	Non-inert Landfill	This policy provides criteria where non-inert landfill facilities will be supported. Proposals for landfill facilities have the potential for the following LSEs at European sites which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in
Policy T39	Beneficial Use of Inert Waste by Permanent Deposit	This policy provides criteria where proposals for the deposit of inert waste on land will be permitted. This type of waste disposal has the potential for the following LSEs at European sites which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy T40	Wastewater Treatment	This policy provides criteria where proposals for the upgrade or extension of wastewater treatment works. Water treatment has the potential for the following LSEs at European sites which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category L	Screen in

Energy

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
Policy S25	Energy Supply	This policy sets out suitable locations (Kingsnorth and the Isle of Grain) for low carbon energy and renewable development along with criteria which must be met. These locations are adjacent to the Medway Estuary and Marshes SPA and Ramsar designations and also close to the Thames Estuary and Marshes SPA and Ramsar and Swale SPA and Ramsar. This policy triggers development and change with the potential for the following LSEs at European sites alone which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects - To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.	Category I	Screen in
Policy T41	Heat Networks	This policy sets out the requirement for new development to follow the heat network provision hierarchy. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	Category F	Screen out

Site Allocation Policies

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
SA1	Chatham Town Centre and Surrounds	This policy sets out criteria which development in Chatham Town Centre and surrounds must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.	Category L	Screen in
SA2	Heritage-led Sites	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.	Category L	Screen in
SA3	Gillingham District Centre	This policy sets out criteria which development in Chatham Town Centre and surrounds must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process:	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		- Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar.		
SA4	River Waterfront	This policy sets out aspirations for development in this area to deliver greater accessibility to the river waterfront. The improvement of waterfront accessibility close to the North Kent Marshes designated sites (and areas of associated Functionally Linked Land) has the potential to increase recreational pressure and disturbance for species using these areas. There is also the potential for impacts associated with lighting of new routes / developments (urbanisation effects) and construction implications. Proposals for additional development alongside improvements in waterfront accessibility therefore have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar.	Category L	Screen in
SA5	Strood Town Centre and Surrounds	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process:	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		- Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.		
SA6	Chapter Farm/Land west of Strood	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.	Category L	Screen in
SA7	Capstone Valley	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar.	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		- Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.		
SA8	Hoo St Werburgh and Chattenden	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar.	Category L	Screen in
SA9	High Halstow	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar.	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
SA10	Lower Rainham	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar.	Category L	Screen in
SA11	Rural Settlements	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.	Category L	Screen in
SA12	Other Sites	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process:	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		- Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC.		
SA13	Frindsbury Peninsula Opportunity Area	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. - Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL. - Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar.	Category L	Screen in
SA14	Employment Sites	This policy sets out criteria which development at Heritage-led sites must meet. It lists site specific allocations. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: - Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. - Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar.	Category L	Screen in

Policy Reference	Policy name	Summary of Policy and Identification of LSEs	Screening category	Screening conclusion
		Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the Swale SPA and Ramsar, and upon areas of FLL.		

Appendix D: Site Allocations Screening Summary to inform Test of Likely Significance

Table Notes:

Air Quality LSEs: All site allocations set out in the Regulation 19 consultation (**Figure D.1**) have the potential to act cumulatively to increase traffic flows on the local road network. An increase in traffic related emissions have the potential to change air quality. Applying Natural England's screening thresholds, air quality Likely Significant Effects (LSEs) are considered possible at a number of European sites as a result of growth set out in the MLP. These sites include the Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and North Downs Woodlands SAC. **As growth at all allocations has the potential to contribute cumulatively to a change in air quality in-combination with other plans and projects, all sites have been screened in under Category L.**

Water Quality and Quantity LSEs: All site allocations set out in the Regulation 19 consultation have the potential to act in combination with one another to increase the quantity of water required for treatment at Wastewater Treatment Works (WwTWs). This may result in the deterioration of downstream water quality. Water abstraction for development also has the potential to change the quantity of water at hydrologically sensitive European sites. Taking a precautionary approach, hydrology impacts from the combined effect of all developments together, acting in-combination with other plans and projects have the potential to result in LSEs at downstream European sites and those in the MLP area (the Medway Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and North Downs Woodlands SAC). **As growth at all allocations has the potential to contribute cumulatively to a change in water resources and water quality in-combination with other plans and projects, all sites have been screened in under Category L.**

This appendix screens a number of other impact pathways from each site allocation including recreational pressure, direct urbanisation impacts, urbanisation impacts upon areas of FLL and the impacts of coastal squeeze. Red shading indicates potential LSEs. Green shading indicates no LSE.

Recreational pressure LSEs: Recreational impacts have been screened through the application of zones of influence (Zol). These include a 6km Zol from the North Kent Estuary and Marshes European sites (**Figure D.2**) and a 7km Zol from the North Downs Woodlands SAC (**Figure D.3**).

Urbanisation effects LSEs: Urbanisation effects typically occur when development is located close to a European site boundary. Urbanisation effects may include noise disturbance, lighting effects, visual disturbance, cat predation, fly-tipping, wildfire, littering, vandalism and damage to / fragmentation of habitats. A distance of 400m is typically used to determine the zone of influence of urbanisation effects as this represents the distance from which people will access designated sites by foot and the distance within which cat predation, noise, lighting and visual disturbance occurs. It is however recognised that the environment of the North Kent coastal European designations is open and low lying in nature with minimal sources of urbanisation disturbance. Therefore, a combination of factors has been taken into consideration which include the following:

- Distance from the European site (sites closer to an SPA and/or Ramsar site are more likely to provide roosting and /or foraging opportunities for birds).
- Location of the site within a Natural England SSSI IRZ.
- Site characteristics.

Urbanisation effects may take place at designated sites and also at functionally linked land¹ and therefore both have been considered in this screening assessment.

¹ "The term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore 'linked' to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at

Coastal squeeze LSEs: Consideration has been given to the location of site allocations in relation to required compensatory habitat sites and managed realignment sites designed to help compensate for the coastal squeeze impacts (as set out in the Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (MEASS)² – **Figure D.5** and Thames Estuary 2100 (TE2100)³. The compensation sites of relevance to the HRA include No. 2 – Abbots Court on the Hoo Peninsula and No. 13 – Danes Hill close to Riverside Country Park (see Figure 10 of the MEASS HRA⁴ - copied below for ease of reference). Where the allocations do not coincide with a compensatory habitat site or area of managed realignment this is denoted with an 'x'.

favourable conservation status". Source: Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

² Environment Agency (2019) Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Available at: <https://ea.sharefile.com/share/view/s53042b8483441048/foaa518c-77f9-4111-8a59-23a6f61add9c> [Date Accessed: 29/04/25].

³ Environment Agency (2021) Thames Estuary (TE) 2100 Plan 10 year Monitoring Review. Available at: <https://www.gov.uk/government/publications/thames-estuary-2100-te2100-monitoring-reviews/thames-estuary-2100-10-year-monitoring-review-2021#habitat> [Date Accessed: 18/06/25].

⁴ Environment Agency (2018) Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Report – Technical Appendix K – HRA. Available at: (<https://ea.sharefile.com/share/view/s53042b8483441048/foaa518c-77f9-4111-8a59-23a6f61add9c>) [Date Accessed: 29/04/25].

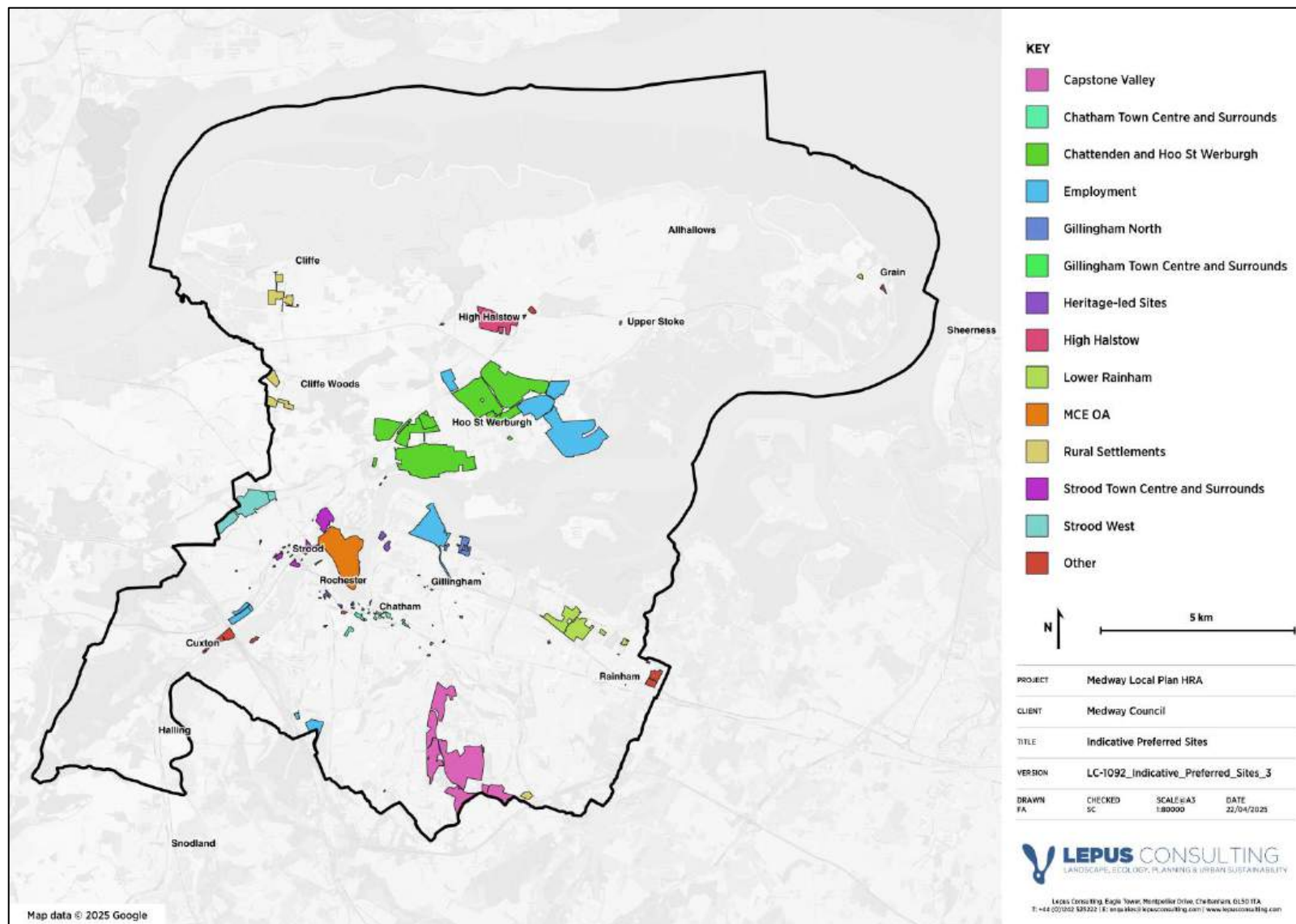


Figure D.1: Site allocation location map

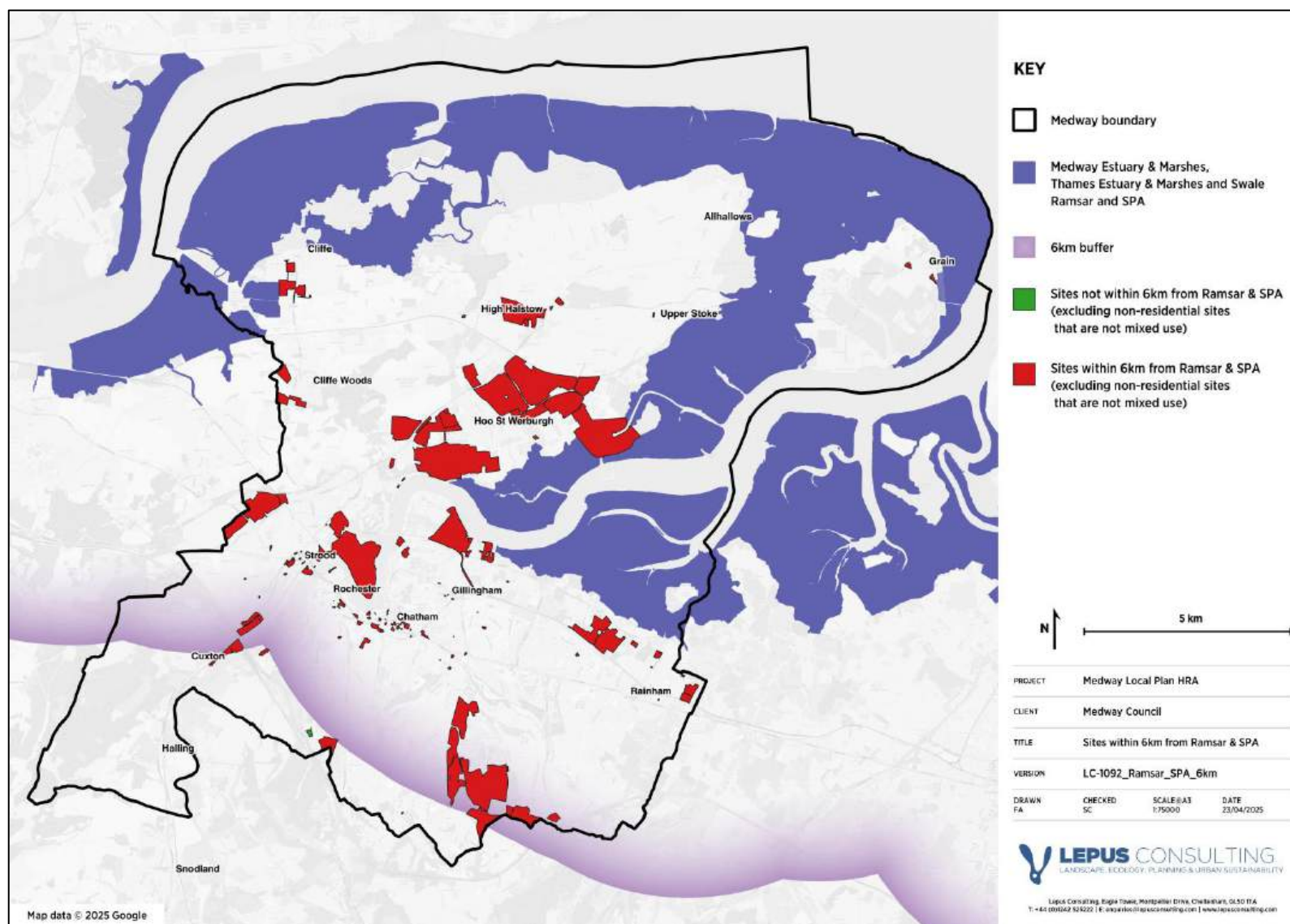


Figure D.2: Bird Wise 6km Zol from the North Kent Estuary and Marshes European sites

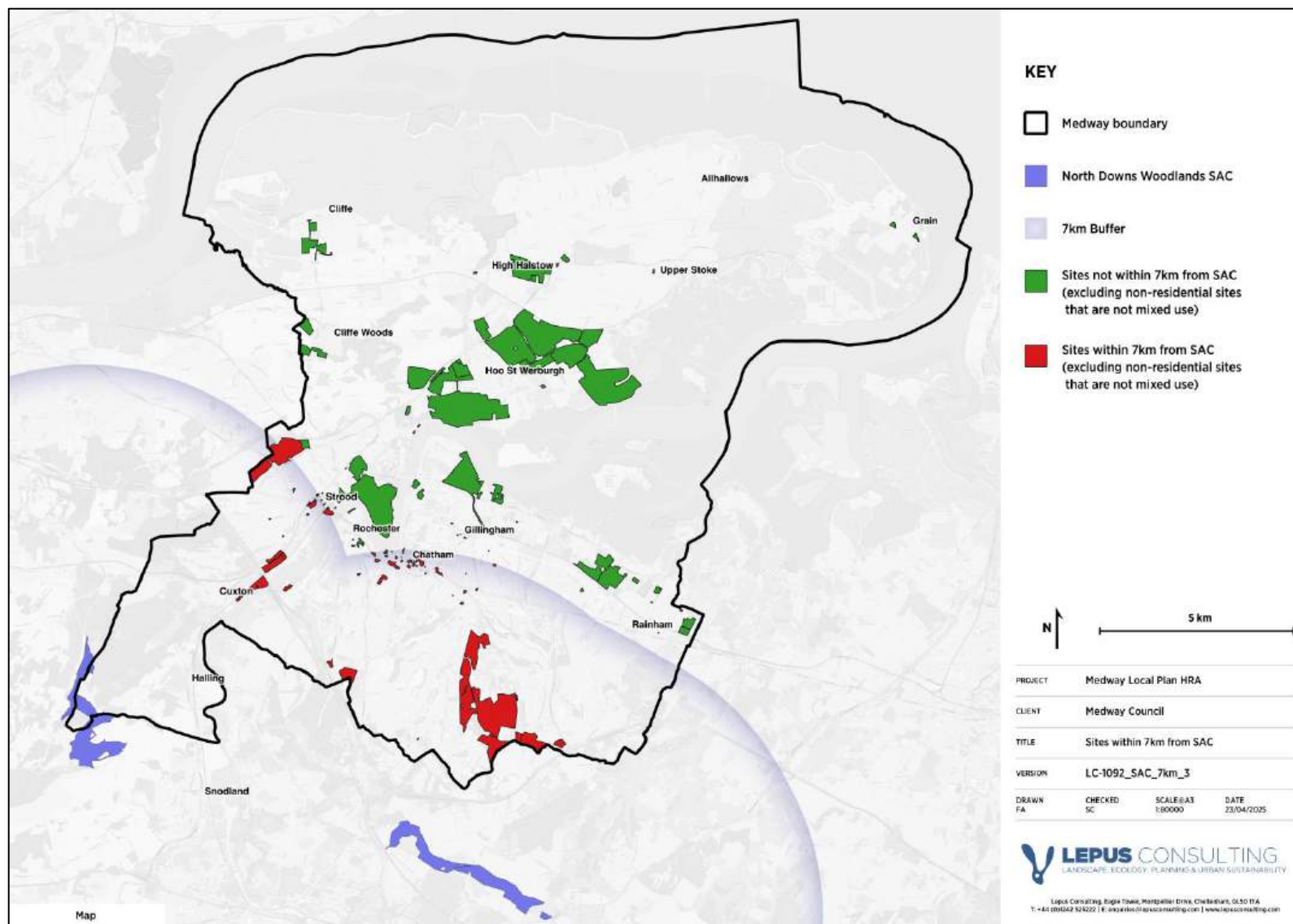
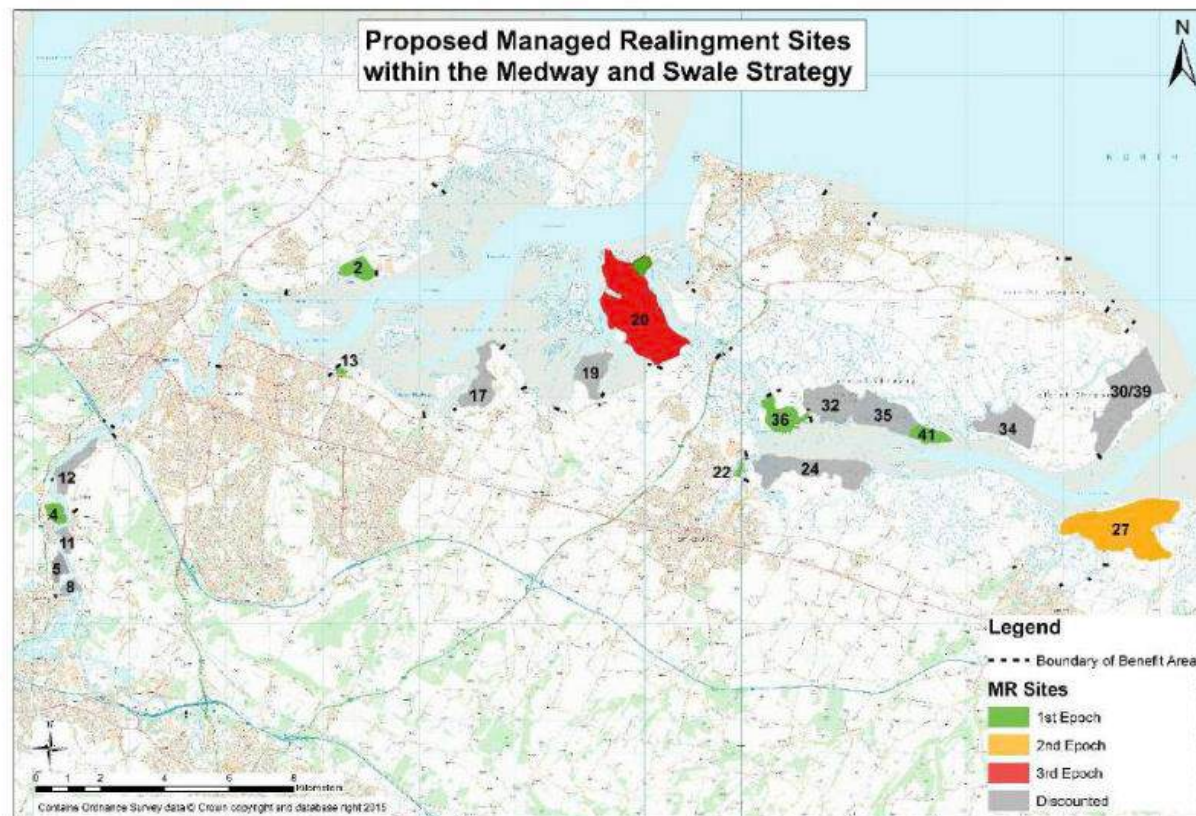


Figure D.3: 7km ZOI from North Downs Woodlands SAC

Figure 10: Map of the proposed MR sites across the Strategy area.



Source: Mott MacDonald, 2018

Figure D.4: Extract from MEASS showing areas of compensation habitat⁵

⁵ Environment Agency (2019) Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Available at: <https://ea.sharefile.com/share/view/s53042b8483441048/foaa518c-77f9-4111-8a59-23a6f61add9c> [Date Accessed: 29/04/25].

Capstone Valley Sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HW11	Residential	60	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 5.5km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This site comprises a greenfield and developed area. It is surrounded by agricultural fields with urban development to its northeast. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x
HW3	Residential	335	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 5.2km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises agricultural land and woodland, intersected by several small roads. To the south, the site is bordered by further agricultural land. To the north, the site is bordered by allotments and a developed retail area. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
LW10	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4.6km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a greenfield and developed land with residential development to the east and agricultural land on other sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x
LW4	Residential	670	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 5.3km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises arable fields and woodland. Residential development lies to its west, with woodland and arable fields on all other sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
LW6	Residential	698	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.4km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises arable fields and woodland. Residential development lies to its west and north, with woodland and arable fields on all other sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x
LW7	Residential	450	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 5.7km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises arable fields. Residential development lies to its west and north, with arable fields on all other sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
LW8	Residential	2000	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4.5km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises arable fields. Arable fields lie on all sides, aside from a small retail development to the south. Residential development lies beyond this. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Chatham Town Centre and Surrounds

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB15	Residential	60	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB27	Residential	20	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB37	Residential	200	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
FP10	Residential	139	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 4.1km to the northeast of the site. The site comprises a school (including buildings, hard standing and playing fields) within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB12	Residential	24	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of trees in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
L12	Residential	13	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.8km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB30	Residential	21	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB1	Residential	12	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.2km to the northeast of the site. This site includes a previously developed parcel of land in Chatham on the southern bank of the River Medway. With the A2 to the south and urban development and transport infrastructure on all other sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB21	Residential	14	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB24	Residential	9 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
L9	Residential	22	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3km to the northeast of the site. The site comprises car dealership within an urban and residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB39	Residential	24	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of trees in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
GS2	Residential	45	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 2.8km to the northeast of the site. This site comprises the edge of a residential area, with some tree cover and a small road, in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB31	Residential	179	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of trees, grass and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB41	Residential	7 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land, garden and trees in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB7	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and trees in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB19	Residential	13	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB3	Residential	13	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
L7	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.9km to the northeast of the site. The site comprises an area of previously developed land within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB20	Residential	98	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB4	Residential	50 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of previously developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB49	Residential	150	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
FP25	Residential	121	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.4km to the northeast of the site. This site comprises Chatham Station and associated railway sidings, parking, buildings etc on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRow on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
CCB8	Residential	164	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol. It is also within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the coastal designations and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Chattenden and Hoo St Werburgh

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH32	Residential	3	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar - approx. 90m to the south. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, the site has less than 10 proposed new net homes and therefore does not trigger consultation with Natural England. On a precautionary basis, given its proximity to the European sites and location within the IRZ, this allocation is screened in	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH12	Residential	1801	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located adjacent to this allocation. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England and urbanisation impacts upon FLL and the designated sites themselves are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH25	Residential	80	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 600m to the south and Thames Estuary and Marshes SPA and Ramsar approx. 4.3km to north. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England. LSEs upon both designated sites and FLL are therefore screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH24	Residential	85	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 790m to the south and Thames Estuary and Marshes SPA and Ramsar approx. 4.2km to north. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England. Likely significant urbanisation effects on FLL and the designated sites themselves are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH6	Residential	550	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1.5km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 3.5km to north. This allocation is not located within the FLL SSSI IRZ. However, considering the size of this site (550 units) and its location in proximity to the FLL SSSI IRZ on the Hoo Peninsular, it is screened in for potential urbanisation effects both on the designated site itself and also FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH11	Residential	240	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 1.2km to the south. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, considering the size of this site (240 units) and its location in proximity to the FLL SSSI IRZ on the Hoo Peninsular, it is screened in for potential urbanisation effects both on the designated site itself and also FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH33	Residential	330	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 530m to the south and Thames Estuary and Marshes SPA and Ramsar approx. 4.3km to north. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England. LSE are possible due to urbanisation effects upon the designated sites themselves and also FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH5	Residential	50	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1.4km to the east. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has 50 proposed new net homes. Therefore, the site triggers consultation with Natural England. Likely significant urbanisation effects on designated sites themselves and FLL are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH8	Residential	450	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 3.4km to north. A small part of the site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 50 proposed new net homes. Therefore, the site triggers consultation with Natural England. Likely significant urbanisation effects on the designated sites themselves and FLL are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH41	Residential	25	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1.3km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 3.4km to north. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, considering the size of this site (25 units) and its location in proximity to the FLL SSSI IRZ on the Hoo Peninsular, it is screened in for potential urbanisation effects both on the designated site itself and also FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) - Site characteristics	Coastal Squeeze
HHH22 & HHH31	Residential	1700	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 800m to the south and Thames Estuary and Marshes SPA and Ramsar approx. 3.3km to north. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England. Likely significant urbanisation effects on the designated sites themselves and FLL are screened in.	x

Employment

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
FH1	Employment	11.841ha	n/a as employment site	The closest European sites are Medway Estuary and Marshes SPA and Ramsar, located approx. 6.1km to the north. This site is comprised of two land components in a highly urbanised setting. It includes parking and formerly developed land. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the distance of this site from the North Kent coastal designations and its urban and previously developed nature it is unlikely that there will be urbanisation LSEs upon any European designation or associated FLL.	x
HHH19	Employment	13.9ha	n/a as employment site	The closest European sites are Medway Estuary and Marshes SPA and Ramsar, located approx. 2km to the southeast, and Thames Estuary and Marshes SPA and Ramsar approx. 2.7km to the northwest. The majority of the site lies within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and is an employment site. Therefore, the site triggers consultation with Natural England. Likely significant urbanisation effects on both European designated sites and FLL are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SM16	Mixed use	57.714ha 2200 residential units	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 610m to the northeast of the site, on the opposite side of the River Medway. A small area of the site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and it is an employment site. Therefore, the site triggers consultation with Natural England. Given the scale of development at this location and proximity of mudflat habitat, potential impacts upon European sites and associated areas of FLL are screened in.	x
RWB5	Employment	1.617ha	n/a as employment site	The closest European sites are Medway Estuary and Marshes SPA and Ramsar, located approx. 6.4km to the north. This site is made up of a field, bordered by trees. Developed land lies to the north, east, and south. Woodland lies to the west. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the distance of this site from the North Kent coastal designations it is unlikely that there will be urbanisation LSEs upon any European site or associated FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
CHR16	Employment	8.949ha	n/a as employment site	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 5.7km to the east of the site. The site comprises an area of previously developed land within an urban setting to the south of the A228 and to the east of the M2. Urban development and road infrastructure are likely to provide a significant source of disturbance, with a railway running along the site's northern boundary. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat. There is a PRow which runs along the southern boundary of the site. Taking into account the nature and location of the site, it is not considered to provide suitable FLL. It is unlikely that there will be urbanisation LSEs upon any European site or associated FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
CHR17	Employment	3.727ha	n/a as employment site	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 5.6km to the east of the site. The site comprises an area of previously developed land within an urban setting to the south of the A228 and to the east of the M2. Urban development and road infrastructure is likely to provide a significant source of disturbance with a railway marking the site's southern boundary. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There is a small strip of deciduous woodland priority habitat in the far south western corner of the site which would be impacted. There are no PRowS across the site. Taking into account the nature and location of the site, it is not considered to provide suitable FLL. It is unlikely that there will be urbanisation LSEs upon any European site or associated FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
CHR18	Employment	1.284ha	n/a as employment site	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 5.6km to the east of the site. The site comprises an area of developed land within an urban setting to the south of the A228 and to the east of the M2. Urban development and road infrastructure is likely to provide a significant source of disturbance with a railway line marking the site's northern boundary. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat. There is a PRow which runs along the southern boundary of the site. Taking into account the nature and location of the site, it is not considered to provide suitable FLL. It is unlikely that there will be urbanisation LSEs upon any European site or associated FLL.	x
HHH35	Employment	57.44ha	n/a as employment site	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar is located 919m to the north and east of the site. The site lies within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and is an employment site. Therefore, the site triggers consultation with Natural England. Taking into account the nature of this site and its location within the wider area on the Hoo Peninsula, it has potential to provide suitable FLL and urbanisation effects are likely upon both designated sites and areas of FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
HHH36	Employment	114.109ha	n/a as employment site	The Medway Estuary and Marshes SPA and Ramsar is located immediately adjacent to this site, with a small area of designated land extending into the site boundary. The site lies within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and is an employment site. Therefore, the site triggers consultation with Natural England. Taking into account the nature of this site and its location within the wider area on the Hoo Peninsula, it has potential to provide suitably FLL and urbanisation effects are likely upon both European sites and areas of associated FLL.	x

Gillingham North

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GN6	Residential	400	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar sites are located 53m to the east. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England. Given the location of this allocation within 53m of the Medway Estuary and Marshes SPA and Ramsar designations and presence of mudflat habitat on site, it has the potential to affect FLL directly and also have urbanisation effects upon the designated sites and also adjacent areas of FLL.	x
GN3	Residential	176	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 586m to the northeast of the site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 50 proposed new net homes. Therefore, the site triggers consultation with Natural England. Given the location and nature of this site, it has the potential to affect FLL directly and also have urbanisation effects upon adjacent areas of FLL. Likely significant urbanisation effects on designated sites and also areas of FLL are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GN15	Residential	1100	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar sites are located 99m to the east. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England. Given the location of this allocation within 99m of the Medway Estuary and Marshes SPA and Ramsar designations and presence of mudflat habitat to its immediate east and west, urbanisation effects upon designated sites themselves and areas of FLL are likely.	x

Gillingham Town Centre and Surrounds

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GS7	Residential	14 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.8km to the northeast of the site. This site comprises an area of previously developed land in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRow on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GS4	Residential	24	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.5km to the northeast of the site. This site comprises an area of currently developed land in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRow on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GS26	Residential	14	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.6km to the northeast of the site. This site comprises an area of currently developed land and parking in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GS19	Residential	57	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.5km to the northeast of the site. This site comprises an area of currently developed land in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRow on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GS14	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.7km to the northeast of the site. This site comprises an area of currently developed land and parking in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Heritage-led Sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
FP11	Residential	123	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.3km to the east of the site. The site comprises an area of developed land within an urban setting surrounded on all sides by existing development. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
FP1	Residential	28	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.7km to the northeast of the site. This site comprises an area of currently developed land, areas of grass and trees and parking on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is a PRoW running along the site's eastern boundary. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
FP12	Residential	70	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.4km to the northeast of the site. This site comprises an area of currently developed land on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRow on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RWB19	Residential	246	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and road infrastructure in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
FP14	Residential	7	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.2km to the east of the site. The site comprises a developed site within an urban setting on the south bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
CCB25	Residential	150	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.9km to the north east. The current and surrounding land use is urban with some green space, with the site located on the southern bank of the River Medway. There will be loss of broadleaved woodland priority habitat. There are no PRoWs across the site. The site does not sit within a FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
FP16	Residential	6 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.4km to the northeast of the site. This site comprises a developed site within an urban setting on the southern bank of the River Medway. With residential development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRow on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
CCB35	Employment	2.7ha	n/a as employment site	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 2km to the east. The current land use is green space with a wooded area and parking. It is surrounded by urban development and is located on the southern bank of the River Medway immediately adjacent to mudflat priority habitat. There will be no loss of priority habitat. There are no PROWs across the site. The site does not sit within a FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites themselves or areas of FLL associated with the North Kent Estuary and Marshes designations.	x

High Halstow Sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
HHH26	Residential	760	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites the Thames Estuary and Marshes SPA and Ramsar which is located approx. 1.5km to the north. The Medway Estuary and Marshes SPA and Ramsar sites are located approx. 2.8km to the south. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England. Considering the nature and location of the site and its location in the wider landscape, it is considered to provide suitable FLL. LSE due to urbanisation effects upon both designated sites and also FLL are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
HHH29	Residential	55	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which is located approx. 2.3km to the north. The Medway Estuary and Marshes SPA and Ramsar sites are located approx. 2.9km to the south. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England. Considering the nature and location of the site and its location in the wider landscape, it is considered to provide suitable FLL. LSE due to urbanisation effects upon both designated sites and also FLL are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
HHH15	Residential	5	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Thames Estuary SPA and Ramsar which are located approx. 1.7km to the north west. The site does not sit within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, considering the nature and location of the site and its location in the wider landscape, it is considered to provide suitable FLL. LSE due to urbanisation effects upon both designated sites and also FLL are screened in.	x

Lower Rainham Sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RN17	Residential	32	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 350m to the north east. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As the development is in a rural setting, and has over 10 proposed new net homes, it triggers consultation with Natural England. LSE due to urbanisation effects upon both designated sites and areas of FLL are screened in.	x
RN23	Residential	75	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 360m to the north east. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations and has over 50 proposed new net homes. Therefore, the site triggers consultation with Natural England. Considering the nature and location of the site and its location in the wider landscape, it is considered to provide suitable FLL. LSE due to urbanisation effects upon both designated sites and areas of FLL are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RN25	Residential	5 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 360m to the north east. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. It does not however trigger consultation for development due to the scale of development. Considering the nature and location of the site and its location in the wider landscape, it is considered to provide suitable FLL. LSE due to urbanisation effects upon both designated sites and areas of FLL are screened in.	x
RN9	Residential	800	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 200m to the north east. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As the development is in a rural setting, and has over 10 proposed new net homes, it triggers consultation with Natural England. LSE due to urbanisation effects upon both designated sites and areas of FLL are screened in.	x

MCE OA Sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR53	Residential	690	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Medway Marshes Estuary SPA and Ramsar which are located approx. 2.8km to the east. The site's current land use is for commercial developments. It sits on the northern bank of the River Medway. The site does not sit within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature and location of the site, it is unlikely to provide FLL or have any urbanisation effects upon designated sites or areas of FLL.	x

Rural Settlements Sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
AS25	Residential	34	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which are located approx. 741m to the east. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As it is in a rural location, bordered on three sides by agricultural land, and has over 10 proposed new net homes, consultation with Natural England is triggered. Due to its location in the SSSI IRZ, urbanisation impacts upon both designated sites and areas of FLL are screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
HW6	Residential	88	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 5km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a greenfield surrounded by woodland with a minor road running through it, and urban development to its northeast, and the M2 to its south. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR7	Residential	44	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which is located approx. 850m to the north. The Medway Estuary and Marshes SPA and Ramsar sites are located approx. 4.7km to the south. The site sits partly within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As it is in a rural location and there are over 10 proposed new net homes, the site triggers consultation with Natural England. Considering the location and nature of the site, proximity to the Thames Estuary and Marshes SPA and Ramsar this site has the potential to provide suitable FLL. LSE are possible due to urbanisation effects upon both designated sites and also areas of FLL, so the site is screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
AS11	Residential	10	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 630m to the southeast. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As it is in a rural location and there are 10 proposed new net homes, the site triggers consultation with Natural England. Development has the potential to have urbanisation effects upon both designated sites and also areas of FLL, so the site is screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR4	Residential	130	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 4.3km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 1.4km to north. The site does not sit within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, considering the nature of the site and its location, it has the potential to have urbanisation effects upon both designated sites and also areas of FLL, so the site is screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR14	Residential	49	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 4km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 1.5km to north. The site does not sit within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, considering the nature of the site and its location, it has the potential to have urbanisation effects upon both designated sites and also areas of FLL, so the site is screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR51	Residential	250	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	This site is located adjacent to the Thames Estuary and Marshes SPA and Ramsar sites which lies to its west. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As there are over 10 proposed new net homes, the site triggers consultation with Natural England. Considering the location and nature of the site, proximity to the Medway Estuary and Marshes SPA and Ramsar this site has the potential to provide suitable FLL. LSE are possible due to urbanisation effects upon both designated sites and also areas of FLL and the site is therefore screened in.	x

Strood Town Centre and Surrounds Sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF9	Residential	40	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 4.6km to the east of the site. The site comprises an area of developed land within an urban setting to the south of the Chatham main line in Strood centre. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat. There are no PRowS at the site. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF41	Residential	216	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 3.9km to the east. The current and surrounding land use is urban, with the site located on the northern bank of the River Medway immediately adjacent to mudflat priority habitat. There is a PRoW running broadly NE/SW through the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF35	Residential	171	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites are likely. It is also located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.9km to the northeast of the site. The site comprises an area of hard standing on the northern bank of the River Medway. Urban development and transport infrastructure locally is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however there is some mudflat priority habitat to the south west of the site, separated by road infrastructure. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF20	Residential	15	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRow on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF15	Residential	350	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF23	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x
SW7	Residential	6 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.4km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is currently used as car parking within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF32	Residential	6 (consented)	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.8km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF30	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF8	Residential	19	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF34	Residential	52	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x
SW6	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.5km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is developed land, areas of green space and trees within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF5	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 4.5km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is currently developed land, areas of green space and trees within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR25	Residential	152	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.6km to the northeast of the site. The site comprises an area of previously developed land, scrub and trees with an industrial area to the south east and residential areas to the north and west. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF38	Residential	12	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.8km to the northeast of the site. The site comprises an area of developed land within an urban setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF31	Residential	8 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF24	Residential	7 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land, parking and trees in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF27	Residential	13	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.9km to the northeast of the site. The site comprises an area of hard standing and greenspace within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF44	Residential	6	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.1km to the northeast of the site. The site comprises an area of previously developed land within a residential area. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Strood West Sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF1	Residential	360	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Thames Estuary and Marshes SPA and Ramsar sites which are located approx. 3.2km to the north of the site. The site comprises an agricultural field. The site is bordered by more agricultural fields to the north and west, as well as Gravesend Road to the east and residential developments to the south. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SNF3	Residential	800	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Thames Estuary and Marshes SPA and Ramsar sites which are located approx. 2.8km to the north of the site. The site comprises agricultural fields. The site is bordered by more agricultural fields to the east, small roads to the north and east, and residential development to the south. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR5	Residential	120	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC	The closest European sites are the Thames Estuary and Marshes SPA and Ramsar sites which are located approx. 2.9km to the north of the site. The site comprises an agricultural field and one existing residential settlement. The site is bordered by more agricultural fields to the west. A line of trees separates the site from the A289 to its north and residential developments lie to the east and south. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Other Sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
AS2	Residential	4	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 2.6km to the southeast. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, the site does not trigger consultation with Natural England, as there are less than 10 proposed new net homes. Given its location on the Hoo Peninsular this site will be screened in for assessment of urbanisation effects upon both designated sites and areas of FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RN29	Residential	14	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 600m to the north. The site is currently developed with urban development to its north, east and west. There are green fields to its south. These areas are likely to be a source of disturbance and limit bird sight lines. There are no PRowWs. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on both designated sites and areas of FLL are unlikely, so the site is screened out.	x
CHR14	Residential	49	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The allocation is more than 6km from the North Kent Estuary and Marshes designated sites. The site is developed as a car park with an area to the east comprising two bodies of water and areas of coastal saltmarsh. The site is located on the banks of the River Medway adjacent to mudflat priority habitat and other areas of coastal saltmarsh. A railway line marks the site's northern boundary. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature and location of this site, it is unlikely to provide FLL or have any urbanisation effects upon either designated sites or areas of FLL, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
AS6	Residential	40	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 2.7km to the southeast. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. As the site has over 10 proposed new net homes, the site triggers consultation with Natural England. Given the location of this site, urbanisation impacts upon both designated sites and areas of FLL are possible and therefore it is screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
AS28	Residential	9	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Medway and Thames Estuary and Marshes SPA and Ramsar which are located approx. 200m to the east. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations but does not trigger consultation with Natural England. Given the location of this site, urbanisation impacts upon both designated sites and areas of FLL are possible and therefore it is screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RN30	Residential	90	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 1.1km to the north. The site is an agricultural field surrounded by a hedgerow. There are greenfields to its north and west and a golf course to its east. These areas are likely to be a source of disturbance and limit bird sight lines. There are no PROWs. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on both designated sites and also areas of FLL are unlikely, so the site is screened out.	x
RN31	Residential	80	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 840m to the north. The site is an agricultural field surrounded by a hedgerow. There are greenfields to its north and west and a golf course to its east. These areas are likely to be a source of disturbance and limit bird sight lines. There are no PROWs. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on both designated sites and also areas of FLL are unlikely, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR49	Residential	6	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1km to the east. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, as the site has less than 10 proposed new net homes, the site does not trigger consultation with Natural England. Considering the nature of the site and its location, and taking a precautionary approach LSEs upon both designated sites and also areas of FLL from urbanisation effects are considered to be possible, so the site is screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GN8	Residential	17	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 419m to the northeast of the site. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, as the site has less than 50 proposed new net homes, it does not trigger consultation with Natural England. Considering the nature of the site and its location, and taking a precautionary approach LSEs upon both designated sites and also areas of FLL from urbanisation effects are considered to be possible, so the site is screened in.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GS35	Residential	12	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.4km to the northeast of the site. The site comprises an area of previously developed land and hard standing within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RWB11	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RWB12	Residential	3	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 4.1km to the northeast of the site. The site comprises an area of previously developed land and hard standing within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations, so the site is screened out.	x
RN22	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 770m to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises developed land within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
W4	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.4km to the northeast of the site. The site comprises an area of developed land within an industrial area. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations, so the site is screened out.	x
W7	Residential	21	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 1.7km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is currently developed (building and car park) with an area of greenspace (garden) and trees in a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon either designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
AS10	Residential	5 (consented)	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 630m to the southeast. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations, however consultation with Natural England is not triggered due to the number of homes. Given the location and nature of this site, and taking a precautionary approach, it has the potential to have urbanisation impacts upon either designated sites or areas of FLL associated with the North Kent Estuary and Marshes designations, so the site is screened in.	x
T3	Residential	20 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 1.5km to the north. The site comprises previously developed land and trees in a residential setting. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on either designated sites or areas of FLL are unlikely, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RWB2	Residential	36	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZOI and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 5.8km to the east of the site. The site comprises an area of boat storage and buildings at Medway Marina on the southern bank of the River Medway. Urban development and transport infrastructure locally is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however there is some mudflat priority habitat to the north of the site. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on either designated sites or areas of FLL are unlikely, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
REWW3	Residential	11	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 4.2km to the northeast of the site. The site comprises an area of developed land within an urban and residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on either designated sites or areas of FLL are unlikely, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR48	Residential	8	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.2km to the east of the site. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. However, as the site has less than 50 proposed new net homes, it does not trigger consultation with Natural England. Taking a precautionary approach the site is screened in due to its location.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
GS23	Residential	5 (consented)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.3km to the northeast of the site. The site comprises a brownfield site within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on either designated sites or areas of FLL are unlikely, so the site is screened out.	x
LW2	Residential	18	This site is located within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the SAC are therefore likely. This site is not located within 6km of the Medway Estuary and Marshes SPA and Ramsar.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located over 7km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a greenfield with residential development on all sides. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on either designated sites or areas of FLL are unlikely, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RN24	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.3km to the northeast of the site. The site comprises an area of previously developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on either designated sites or areas of FLL are unlikely, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
FP6	Residential	102	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites and the SAC are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.6km to the east of the site. The site comprises a college site within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on either designated sites or areas of FLL are unlikely, so the site is screened out.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
RWB25	Residential	132	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.4km to the northeast of the site. The site comprises an area of previously developed land on the southern bank of the River Medway. Urban development and transport infrastructure locally is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however there is some mudflat priority habitat to the north of the site. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on either designated sites or areas of FLL are unlikely, so the site is screened out.	x

Frindsbury Peninsula Opportunity Area

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation effects: - Proximity to European designations - Within functionally linked land associated with the North Kent Estuary and Marshes designations (SSSI IRZ) Site characteristics	Coastal Squeeze
SR53	Residential	690	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise Zol and recreational LSEs upon these estuary sites are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.2to the east of the site. The site comprises an area of developed land within an urban setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat. There are no PRoWs at the site. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations or upon any European designations, so the site is screened out.	x

Appendix E: European site air quality critical loads and critical levels

All data sourced from APIS.

Table E.1: Critical Levels and Loads for qualifying features at the Medway Estuary and Marshes SPA

Qualifying features	NOx Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
<i>Sterna albifrons</i> (Eastern Atlantic - breeding) – Little Tern	Not sensitive	Not sensitive	5-15a	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Sterna hirundo</i> (Northern/Eastern Europe - breeding) – Common Tern	Not sensitive	Not sensitive	5-15a	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Anas penelope</i> (Western Siberia/North-western/North-eastern Europe) – Eurasian Wigeon	Not sensitive	Not sensitive	10-20b	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Branta bernicla bernicla</i> – Dark-bellied Brent Goose	Not sensitive	Not sensitive	10-20b	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Limosa limosa islandica</i> (Iceland - breeding) – Black-tailed Godwit	Not sensitive	Not sensitive	10-20b	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Numenius arquata</i> (Europe - breeding) – Eurasian Curlew	Not sensitive	Not sensitive	10-20c	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Numenius arquata</i> (Europe - breeding) – Eurasian Curlew	Not sensitive	Not sensitive	10-20b	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Podiceps cristatus</i> (North-western Europe – wintering – Great Crested Grebe	Not sensitive	Not sensitive	10-20b	Potential negative impact on species due to impacts on the species' broad habitat.
<i>Recurvirostra avosetta</i> (Western Europe/Western Mediterranean - breeding) – Pied Avocet	Not sensitive	Not sensitive	10-20b	No expected negative impact on the species due to impacts on the species' broad habitat.

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
<i>Sterna albifrons</i> (Eastern Atlantic - breeding) – Little Tern	Not sensitive	Not sensitive	10-20d	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Sterna hirundo</i> (Northern/Eastern Europe - breeding) – Common Tern	Not sensitive	Not sensitive	10-20d	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Anas acuta</i> (North-western Europe) – Northern Pintail	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Anas clypeata</i> (North-western/Central Europe) – Northern Shoveler	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Anas crecca</i> (North-western Europe) – Eurasian Teal	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Anas penelope</i> (Western Siberia/North-western/North-eastern Europe) – Eurasian Wigeon	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No expected negative impact on the species due to impacts on the species' broad habitat.

Qualifying features	NOx Annual Critical Level (µg/m³)	NH ₃ Annual Mean Critical Level (µg/m³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
<i>Anas platyrhynchos</i> (North-western Europe) - Mallard	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Aythya ferina</i> (North-western/North-eastern Europe) – Common Pochard	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Cygnus columbianus bewickii</i> (Western Siberia/North-eastern & North-western Europe) – Tundra Swan	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Phalacrocorax carbo</i> (North-western Europe) – Great Cormorant	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	APIS identifies species as sensitive to acidity impacts on broad habitat type but no critical load range given.
<i>Podiceps cristatus</i> (North-western Europe - wintering) – Great Crested Grebe	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	APIS identifies species as sensitive to acidity impacts on broad habitat type but no critical load range given.

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
<i>Sterna hirundo</i> (Northern/Eastern Europe - breeding) – Common Tern	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	MaxCLminN: 1.07 MaxCLmaxN: 5.07 MaxCLmaxS: 4 MinCLminN: 0.86 MinCLmaxN: 4.86 MinCLmaxS: 4

Table Notes: a – Coastal dune grasslands habitat; b - Atlantic upper-mid & mid-low salt marshes; c- Low and medium altitude hay meadows; and d – Shifting coastal dunes

Table E.2: Critical Levels and Loads for qualifying features at the Thames Estuary and Marshes SPA

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
<i>Limosa limosa islandica</i> (Iceland - breeding) – Black-tailed Godwit	Not sensitive	Not sensitive	10-20a	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Recurvirostra avosetta</i> (Western Europe/Western Mediterranean - breeding) – Pied Avocet	Not sensitive	Not sensitive	10-20a	No expected negative impact on the species due to impacts on the species' broad habitat.

Table Notes: a - Atlantic upper-mid & mid-low salt marshes

Table E.3: Critical Levels and Loads for qualifying features at the Swale SPA

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
<i>Branta bernicla bernicla</i> – Dark-bellied Brent Goose	Not sensitive	Not sensitive	10-20a	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Numenius arquata</i> (Europe - breeding) – Eurasian Curlew	Not sensitive	Not sensitive	10-20a	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Numenius arquata</i> (Europe - breeding) – Eurasian Curlew	Not sensitive	Not sensitive	10-20b	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Anas crecca</i> (North-western Europe) – Eurasian Teal	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No expected negative impact on the species due to impacts on the species' broad habitat.
<i>Anas strepera</i> (North-western Europe) – Gadwall	Not sensitive	Not sensitive	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No expected negative impact on the species due to impacts on the species' broad habitat.

Table Notes: a - Atlantic upper-mid & mid-low salt marshes; and b- Low and medium altitude hay meadows.

Table E.4: Qualifying Features of all SSSI which underpin the North Kent Coastal Ramsar designations

SSSIs which underpin the North Kent Coastal Ramsar sites	SSSI Qualifying Features
Medway Estuary and Marshes SSSI	Lowland wetland including basin fen, valley fen, floodplain fen, waterfringe fen, spring/flush fen and raised bog lagg SM4-28 – Saltmarsh Vascular plant assemblage Ditches
Mucking Flats SSSI	Invert. assemblage F1 unshaded early successional mosaic Invert. assemblage M311 saltmarsh and transitional brackish marsh Invert. assemblage W211 open water on disturbed sediments Invert. assemblage W3 permanent wet mire
South Thames Estuary and Marshes SSSI	Coastal vegetated shingle (SD1-3) Ditches Invert. assemblage F1 unshaded early successional mosaic Invert. assemblage M311 saltmarsh and transitional brackish marsh Invert. assemblage W211 open water on disturbed sediments Invert. assemblage W314 reed-fen & pools SM4-28 – Saltmarsh Vascular plant assemblage
The Swale SSSI	Brackish lakes Ditches Floodplain fen (lowland) Invert. assemblage M311 saltmarsh and transitional brackish marsh Invert. assemblage W211 open water on disturbed sediments Invert. assemblage W Ponds 314 reed-fen & pools Ponds SM4-28 – Saltmarsh Vascular plant assemblage

Table E.5: Critical Levels and Loads for non-avian qualifying features associated with the Medway Estuary and Marshes SSSI

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
Annual <i>Salicornia</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Atriplex portulacoides</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Inula crithmoides</i> Stands	30	1 or 3	10-20a	Not assessed for this feature
<i>Lolium perenne</i> - <i>Cynosurus cristatus</i> Grassland	30	3	10-20b	MaxCLminN: 1.07 MaxCLmaxN: 5.07 MaxCLmaxS: 4 MinCLminN: 0.86 MinCLmaxN: 4.86 MinCLmaxS: 4
<i>Puccinellia maritima</i> Saltmarsh, <i>Puccinellia maritima</i> Dominant Sub-Community	30	1 or 3	10-20a	Not assessed for this feature
Rayed <i>Aster tripolium</i> On Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Sarcocornia perennis</i>	30	1 or 3	10-20a	Not assessed for this feature
<i>Spartina anglica</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Suaeda maritima</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
Transitional Low Marsh Vegetation with <i>Puccinellia maritima</i> , Annual <i>Salicornia</i> Species and <i>Suaeda maritima</i> .	30	1 or 3	10-20a	Not assessed for this feature
Lowland ditch systems	30	1 or 3	No comparable habitat with established critical load estimate available	Not assessed for this feature
<i>Zostera</i> Communities	30	1 or 3	No critical level has been assigned for this feature, please seek site specific advice	Not assessed for this feature
Vascular plants	30	3	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation.	No comparable acidity value

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
			No comparable habitat with established critical load estimate available	

Table Notes: a - Atlantic upper-mid & mid-low salt marshes; b - Low and medium altitude hay meadows

Table E.6: Critical Levels and Loads for non-avian qualifying features associated with the South Thames Estuary and Marshes SSSI

Qualifying features	NOx Annual Critical Level (µg/m³)	NH ₃ Annual Mean Critical Level (µg/m³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
Annual <i>Salicornia</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Atriplex portulacoides</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Inula crithmoides</i> Stands	30	1 or 3	10-20a	Not assessed for this feature
<i>Puccinellia maritima</i> Saltmarsh, <i>Puccinellia maritima</i> Dominant Sub-Community	30	1 or 3	10-20a	Not assessed for this feature
Rayed <i>Aster tripolium</i> On Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Rumex crispus</i> - <i>Glaucium flavum</i> Shingle Community	30	1 or 3	No information provided	Not assessed for this feature
<i>Sarcocornia perennis</i>	30	1 or 3	10-20a	Not assessed for this feature
<i>Spartina anglica</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Suaeda maritima</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
Transitional Low Marsh Vegetation With <i>Puccinellia maritima</i> , Annual <i>Salicornia</i> Species And <i>Suaeda maritima</i> .	30	1 or 3	10-20a	Not assessed for this feature
Lowland ditch systems	30	1 or 3	No comparable habitat with established critical load estimate available	Not assessed for this feature
Vascular plants	30	3	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	No comparable acidity class
Invertebrate assemblage	No critical level has been assigned for this feature, please seek site specific advice	No critical level has been assigned for this feature, please seek site specific advice	To be determined at site level	No comparable acidity class
<i>Zostera</i> Communities	30	1 or 3	No information provided	Not assessed for this feature

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
Lowland damp grasslands	Not sensitive	Not sensitive	No information provided	Not assessed for this feature
Lowland open waters and their margins	Not sensitive	Not sensitive	No information provided	Not assessed for this feature
Sand-dunes and saltmarshes	Not sensitive	Not sensitive	No information provided	Not assessed for this feature

Table Notes: a - Atlantic upper-mid & mid-low salt marshes

Table E.7: Critical Levels and Loads for non-avian qualifying features associated with the Mucking Flats and Marshes SSSI

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
Invertebrate assemblage	No critical level has been assigned for this feature, please seek site specific advice	No critical level has been assigned for this feature, please seek site specific advice	To be determined at site level	No comparable acidity class

Table E.8: Critical Levels and Loads for non-avian qualifying features associated with the Swale SSSI

Qualifying features	NOx Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
Annual Salicornia Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Atriplex portulacoides</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Inula crithmoides</i> Stands	30	1 or 3	10-20a	Not assessed for this feature
<i>Puccinellia maritima</i> Saltmarsh, <i>Puccinellia maritima</i> Dominant Sub-Community	30	1 or 3	10-20a	Not assessed for this feature
Rayed Aster <i>tripolium</i> On Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Sarcocornia perennis</i>	30	1 or 3	10-20a	Not assessed for this feature
<i>Spartina anglica</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
<i>Suaeda maritima</i> Saltmarsh	30	1 or 3	10-20a	Not assessed for this feature
Transitional Low Marsh Vegetation with <i>Puccinellia maritima</i> , Annual Salicornia Species And <i>Suaeda maritima</i> .	30	1 or 3	10-20a	Not assessed for this feature
Lowland fen without open water	Not sensitive	Not sensitive	15-25b	Not sensitive
Lowland ditch systems	30	1 or 3	No comparable habitat with established critical load estimate available	Not assessed for this feature
Vascular plants	30	3	Decision to be taken at a site-specific level since habitat sensitivity depends on N or P limitation. No comparable habitat with established critical load estimate available	Not assessed for this feature
Invertebrate assemblage	No critical level has been assigned for this feature, please seek site specific advice	No critical level has been assigned for this feature, please seek site specific advice	To be determined at site level	No comparable class
Phragmites Australis - <i>Urtica dioica</i> Tall-Herb Fen	30	1 or 3	10-20a	Not assessed for this feature

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
Zostera Communities	30	1 or 3	No information provided	Not assessed for this feature

Table Notes: a - Atlantic upper-mid & mid-low salt marshes; and b – Rich fens

Table E.9: Critical Levels and Loads for qualifying features associated with the North Downs Woodlands SAC

Qualifying features	NO _x Annual Critical Level (µg/m ³)	NH ₃ Annual Mean Critical Level (µg/m ³)	N Deposition Critical Load (kg N/ha/yr)	Acid Deposition (keq/ha/yr)
<i>Asperulo-Fagetum</i> beech forests	30	1 or 3	10-15	MaxCLminN: 0.142 MaxCLmaxN: 2.079 MaxCLmaxS: 11.029 MinCLminN: 0.142 MinCLmaxN: 4.86 MinCLmaxS: 1.841
Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites)	30	1	10-20	MaxCLminN: 0.856 MaxCLmaxN: 4.856 MaxCLmaxS: 4 MinCLminN: 0.856 MinCLmaxN: 4.856 MinCLmaxS: 4
<i>Taxus baccata</i> woods of the British Isles	30	3	10-15	MaxCLminN: 0.142 MaxCLmaxN: 2.079 MaxCLmaxS: 11.029 MinCLminN: 0.142 MinCLmaxN: 4.86 MinCLmaxS: 1.841

Appendix F: Bird Habitat Requirements

Bird habitat requirements



Avocet (*Recurvirostra avosetta*)
Non-breeding & Breeding

Avocet are a designated feature of the Medway Estuary and Marshes SPA due to their breeding and non-breeding populations. When classified in 1993 this site supported 7% of the British breeding population. One of the most important sites for breeding birds in the Medway, including avocet, is the Chetney Peninsula. The freshwater areas at Barksore marshes also provide good breeding habitat for this species. Avocet breed on areas of grazing marsh, which tend to be located behind sea walls. In summer they move their young into the intertidal area where the mudflats have an abundant source of invertebrates from which they can feed. *Gammarus*, *Corophium*, *Nereis*, *Hydrobia*, *Cardium* and gobies are important prey species. Supporting habitats include coastal lagoons, freshwater and coastal grazing marsh, intertidal coarse and mixed sediments, intertidal mud, sand and muddy sand.



Bar-tailed godwit (*Limosa lapponica*)
Non-breeding

Approximately 50,000 bar-tailed godwit spend winter in the UK, with the Wash Bay in Lincolnshire and Norfolk holding over 60% of this population. Approximately 1,000 individuals of this species can be found wintering at the Swale SPA each year. They are found around the coast on mud or sand, as well as estuaries, and the tideline, where they feed. Their diet is mainly shellfish, marine snails, worms, and shrimps.



Bewick's swan (*Cygnus columbianus bewickii*)
Non-breeding

Bewick's swans breed in Siberia, with around one third of the world's population - 4,350 individuals - migrating to the UK for winter. Numbers of these swans have severely declined by 96% since 1996. The Medway SPA has been recorded to have a small population of less than 20 individuals. They feed on leftover crops such as grains and potatoes in arable fields, as well as aquatic plants and grass.



Black-tailed godwit (*Limosa limosa islandica*)
Non-breeding

The Thames SPA supported 2.4% of the Icelandic breeding population according to the 1993/4-1997/8 peak mean of 1,699 wintering individuals, making this species a designated feature of the SPA. This site continues to support high numbers of black-tailed godwits. High tide counts have shown that Cliffe Pools (Cliffe Pits & Pools and Cliffe Creek & Offshore), Mucking Flats at East Tilbury, Allhallows-on-Sea and the Yantet Inlet contain high numbers of black-tailed godwit. They winter in sheltered estuaries, with the large intertidal mudflats, brackish habitats, beaches and saltmarshes that these areas provide. Black-tailed godwit associated with the site are also known to use habitat outside of the SPA, for example Holehaven Creek SSSI. Supporting habitats include coastal lagoons, freshwater and coastal grazing marsh, intertidal mixed sediments, intertidal mud, sand and muddy sand, intertidal seagrass beds, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritimae*).

Bird habitat requirements



Common tern (*Sterna hirundo*)
Breeding

Around 11,000 common terns arrive in the UK in mid-April, leaving again in late summer for their wintering grounds abroad. Their breeding range has expanded in recent years, being found at flooded gravel pits, reservoirs, lakes, and around the coast at shingle beaches and rocky islands. Inland colonies are often much smaller than coastal colonies. In recent years, the mean population of common terns within the Thames SPA has been 373 individuals. They feed on fish, hunting them by plunge-diving.



Coot (*Fulica atra*)
Breeding

Coots are a common bird throughout the UK, with 26,000 breeding pairs and 205,000 wintering individuals, and are a feature of the Swale SPA's breeding bird assemblage. These birds inhabit parks, lakes, ponds, rivers, and wetlands. Coots will dive to catch small invertebrates, and also feed on larvae, vegetation and seeds.



Cormorant (*Phalacrocorax carbo*)
Non-breeding

The UK has 8,900 breeding pairs of cormorants and a wintering population size of 65,000 individuals, making the UK internationally important in terms of wintering numbers. In 2003/4, 305 individuals were recorded within the Medway SPA. Cormorants are most commonly found around estuaries and shorelines. They were once only found in coastal habitats but have increasingly adopted inland breeding since the 1950s around rivers, lakes, reservoirs and ponds. These birds feed on fish, which they catch when swimming.



Curlew (*Numenius arquata*)
Non-breeding & breeding

Curlews are the largest European wading bird. Curlew breeding and winter populations have both been in long-term decline, with the breeding population declining by 50% from 1995 - 2022. Approximately 59,000 breeding pairs reside in the UK, with an influx of 125,000 wintering individuals. The Swale, Medway, and Thames SPAs regularly host over 1,000 curlews each. These birds inhabit a range of habitats such as rough pasture, heather moorland, wetland and reedbeds in the summer. In the winter, Curlews can be found in coastal areas such as tidal mudflats, saltmarshes and nearby farmland. Their diet consists of worms, shellfish, and shrimp.

Bird habitat requirements



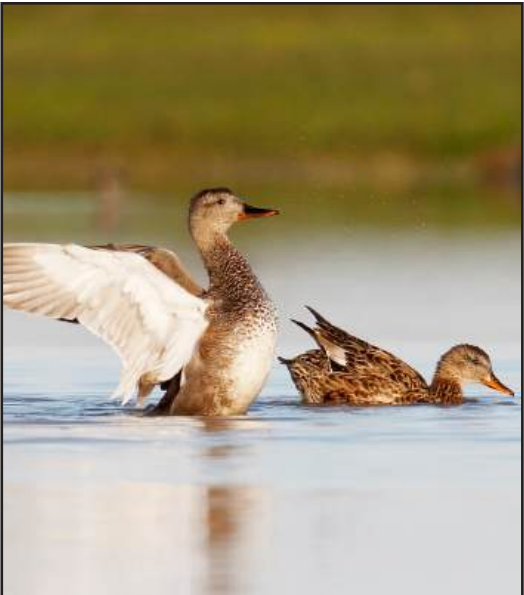
Dark-bellied brent goose (*Branta bernicla bernicla*), Non-breeding

When classified in 1993 the Medway SPA supported internationally important numbers of this species' wintering individuals, representing 2.4% of the world's wintering population. Numbers since classification track regional declines but this decline is greater than the national trend - the cause is not understood. They roost on intertidal areas of brackish and freshwater grazing marshes such as the Hoo marsh, Hoo flats, Chetney and Barksore marshes, and also Nor Marsh and Motney Hill. In areas of saltmarsh such as those bordering the eastern shores of Chetney Marshes, these geese feed on *Spergularia*, *Puccinellia*, *Triglochin*, *Aster trifolium*, *Plantago* and *Salicornia*. They also feed on algae *Enteromorpha* and *Ulva lactuca*, and *Zostera* (eelgrass) that the mudflats support in addition to grasses and winter cereals in agricultural areas. Supporting habitats include freshwater and coastal grazing marsh, intertidal coarse/mixed sediments, intertidal mud, sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritimae*).



Dunlin (*Calidris alpina*), Non-breeding

When classified in 1993 the Medway Estuary and Marshes SPA supported internationally important numbers of dunlin, representing 1.6% of the East Atlantic Flyaway population. This site continues to support high numbers of dunlin, but recent counts show a decline. This decline tracks the regional trend but is greater than the national trend. The dunlin that winter in the Medway SPA are predominantly the alpine sub-species, migrating from breeding grounds in western Siberia. Dunlin roost in large numbers on the upper intertidal areas, such as Burntwick Island, Chetney Marshes and Stoke Saltings and Ooze. They feed on the intertidal mudflats at low tide throughout the estuary such as the mudflats at Ham Green and Twinney, Nor Marsh, Chetney Marshes and Hoo Flats. They feed on invertebrates including *Nereis* (polychaete worm), *Macoma* (saltwater clam), *Hydrobia* (marine snail), *Crangon* (shrimp) and *Carcinus* (crab). Supporting habitats include coastal lagoons, freshwater and coastal grazing marsh, intertidal coarse/mixed sediments, intertidal mud, sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritimae*).



Gadwall (*Anas strepera*) Breeding

Around 1,250 breeding pairs of gadwall inhabit the UK, nesting on freshwater lakes with an abundance of vegetation. This increases to 31,000 wintering birds, who can be seen in large numbers around reservoirs, lakes, flooded gravel pits, and coastal wetlands. The peak population for the Swale SPA in recent years was 198 individuals, whereas the average population for the Thames fluctuates from 400 to 500. Gadwall follow a herbivorous diet, feeding on the surface of shallower parts of waterbodies.



Golden plover (*Pluvialis apricaria*) Non-breeding

In summer, 33,000 breeding pairs of golden plovers can be found in the UK, occupying farmland, grassland, coastal flats, and the uplands around the Pennines, Scotland, Wales and Western Ireland. In winter, the population reaches 410,000 birds which form large flocks anywhere in lowlands throughout the UK, such as marsh, bog, heaths, grassland, and moorland, with the largest numbers being found around the Humber Estuary, East Anglia, and the Somerset Levels. Numbers of golden plovers in the Swale SPA vary, with winter populations ranging from under 10,000 to over 17,300 individuals. Their diet consists of worms, beetles, insects, and other small invertebrates.

Bird habitat requirements



Great crested grebe (*Podiceps cristatus*) Non-breeding

The UK breeding population of great crested grebes is only around 4,900 pairs, however the wintering population consists of approximately 18,000 individuals. In the 19th century, the UK population of these birds was almost eradicated as the species was hunted for their feathers, which were used to decorate women's hats. Peak counts of these birds have reached 191 individuals for the Swale SPA, and 161 for the Medway SPA. Great crested grebes are known for their iconic plumage and courtship rituals. In summer, they can be found in lakes and other ponds, but are more commonly found offshore in habitats such as estuaries in the winter months. They feed on fish, which they hunt for by diving.



Greenshank (*Tringa nebularia*) Non-breeding

Greenshank are a relatively uncommon UK bird, with a breeding population of 1,100 pairs and a wintering population of less than 1,000. Population surveys for the SPAs have identified a mean of 183 individuals for the Thames, 35 individuals for the Medway, and 26 individuals for the Swale. Greenshank are found on moors and bogs in Scotland during the summer but can be found across the UK on inland freshwater lakes, marshes, and coastal wetlands during migration. They feed on small invertebrates such as worms and snails, as well as fish.



Grey plover (*Pluvialis squatarola*) Non-breeding

Grey plover are a designated feature of the Medway Estuary and Marshes SPA. When classified in 1993 this site supported internationally important numbers of this species, representing 3.2% of the East Atlantic Flyway population and 22.9% of the British population. The number of individuals on the site has decreased since classification. This decline appears to track the regional trend but is greater than the national trend. Grey plover are known to be widely distributed across the estuary. Important locations include Stoke Saltings and Hoo Flats on the Isle of Grain and at Chetney Marshes, Riverside Country Park, Nor Marsh, Copperhouse Marshes and the many surrounding creeks. They are also found on the islands of the Medway, such as Hoo Island, Burntwick Island and Deadman's Island. Grey Plover feed on the intertidal mudflats. Important prey species include *Nereis*, *Arenicola* and *Notomastus*. Saltmarsh provides roosting areas. Supporting habitats include coastal lagoons, freshwater and coastal grazing marsh, intertidal coarse/mixed sediments, intertidal mud, sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritima*e).



Hen harrier (*Circus cyaneus*) Breeding

The Thames SPA supported 1% of the British wintering population according to the 1993/4-1997/8 peak mean of 7 individuals, allowing hen harriers to be a designated feature of the SPA. More recent anecdotal information suggest that hen harrier counts across the North Kent Marshes (which also includes those within the Medway and the Swale) are not as high as counts in previous decades. Although this is cause for concern, the target for population abundance is set to maintain due to lack of quantifiable evidence. There are anecdotal sightings around the Isle of Grain, the Yantlet Inlet and Allhallows-on-Sea, as well as occasional sightings throughout the remainder of the site. These areas are characterised by lowland farmland, heathland, and fenland above mean high water; as well as coastal marshes below mean high water. They are known to feed on small birds and mammals. Supporting habitats include coastal lagoons, coastal reedbeds, freshwater and coastal grazing marsh, intertidal mixed sediments, intertidal sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritima*e).

Bird habitat requirements



Kingfisher (*Alcedo atthis*) Breeding

Kingfishers are a feature of the Medway Estuary & Marshes SPA breeding bird assemblage. Around 3,850 breeding pairs of kingfishers are resident to the UK. They inhabit lowland rivers and still waters, but may move to more coastal areas during the winter to increase fishing opportunities. They feed on fish and aquatic insects.



Knot (*Calidris canutus*) Non-breeding

When classified in 1993, the Medway SPA supported internationally important numbers of this species, representing 1.0% of the East Atlantic Flyway population and 1.6% of the British population. The number of individuals on this site has decreased since classification. Important locations for knot include Deadman's Island within the Medway channel, Stoke Saltings on the Isle of Grain and at Chetney Marshes and at Ham Green and the Twinny. Knot feed on the intertidal mudflats. Important prey species include *Macoma*, *Mytilus*/*Cerastoderma* spat and *Hydrobia*. Saltmarsh provides roosting areas. Supporting habitats include coastal lagoons, freshwater and coastal grazing marsh, intertidal coarse/mixed sediments, intertidal mud, sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritimae*).



Lapwing (*Vanellus vanellus*) Breeding

Lapwing are widespread in the UK, with 98,000 breeding pairs and 635,000 wintering individuals. The Swale and Thames SPAs have both supported wintering populations of over 16,000 individuals in recent years. The breeding locations of lapwings have reduced in number due to changes in land management and increased predation. Distribution in the UK has also shifted Eastward and increased in coastal wetlands as birds feed more on tidal mudflats in recent years. Lapwings can be found across a wide range of habitats, including marshes, reedbeds, ponds, lakes, streams, moorland, estuaries, wetland, farmland, etc. Their diet consists of earthworms, leatherjackets, insects, and larvae.



Little grebe (*Tachybaptus ruficollis*) Non-breeding

5,500 breeding pairs of little grebes are found in the UK, which increases to 16,000 individuals with the arrival of the winter population. The Thames Estuary & Marshes SPA's population has been observed to fluctuate between 150 to 500 individuals, whereas the Medway Estuary & Marshes SPA's population has declined from 51 birds to 18. Little grebes live in a range of habitats including ponds, rivers, streams, and brackish or coastal habitats. They are diving birds that feed on small fish and aquatic invertebrates.

Bird habitat requirements



Little tern (*Sternula albifrons*)
Breeding

When classified in 1993, the Medway Estuary & Marshes SPA supported 1% of the British breeding population. Since classification there has been a recorded reduction in the number of breeding pairs of this species on the estuary. Little terns require bare and sparsely vegetated sediment (i.e. intertidal coarse and mixed sediments) to breed on, such as the habitat found at Deadman's Island and Stoke Saltings. They prefer to breed on shallow, sloping shorelines to protect them against flooding. Little terns feed in the shallow waters of the Medway Estuary, and their prey includes sprats, small sandeels, crustaceans and worms. Supporting habitats include coastal lagoons, intertidal coarse/mixed sediments, intertidal sand and muddy sand.



Mallard (*Anas platyrhynchos*)
Breeding

Mallards are the most common duck in the UK, with 61,000-145,000 breeding pairs and 675,000 wintering individuals found throughout the country in urban, suburban, and rural areas, and in most types of water body, including rivers, lakes, ponds, and estuaries. The mean population of mallard ducks within the Swale SPA in recent years is 2,410 individuals. Their diet is incredibly varied, including seeds, acorns, berries, plants, insects, shellfish, etc. They are often fed foods like bread, sweetcorn, lettuce, oats, and seeds by the public.



Marsh harrier (*Circus aeruginosus*)
Breeding

590 breeding pairs of marsh harriers are found in the UK, which has increased from once being extinct in the area in the early 1900s. Marsh harriers first bred in Kent in 1942. In 1995, 24 breeding pairs were observed in the Swale SPA. These birds are mainly found in Eastern England around reedbeds and marshes. Their diet includes small waterbirds and mammals.



Mediterranean gull (*Ichthyaeetus melanocephalus*)
Breeding

1,200 pairs of mediterranean gulls breed in the UK, with the wintering population increasing to 4,000 individuals. Mediterranean gulls were first recorded as breeding in the UK in 1968. As of 1995, the Swale SPA had 12 breeding pairs. These birds inhabit saltmarshes, beaches, inland lakes, and reservoirs. Their diet includes insects, fish, carrion, etc.

Bird habitat requirements



Merlin (*Falco columbarius*)
Breeding

Merlin are a feature of the Medway Estuary & Marshes SPA breeding bird assemblage. There are just over 1,000 breeding pairs of merlin in the UK, most of which are resident. They breed in the uplands and moorlands during the summer and are often seen wintering around saltmarshes and farmlands. Merlins feed on small birds such as meadow pipits.



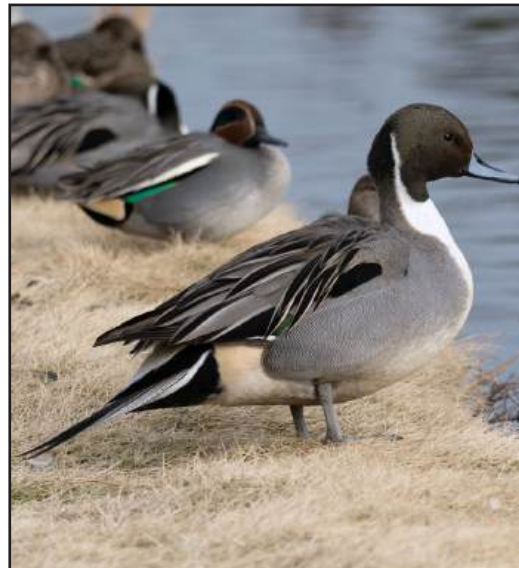
Moorhen (*Gallinula chloropus*)
Breeding

Moorhens are a common bird in the UK, with an estimated population of 210,000 breeding pairs, and 305,000 individuals in winter. The mean population of moorhen within the Thames Estuary & Marshes SPA in recent years was 374 individuals. They can be found in rural and urban areas including parks, ponds, rivers, lakes, streams, and estuaries. They are also often seen foraging in grassy areas. The moorhen's diet is varied, ranging from aquatic plants, seeds, fruit and grasses to insects, snails, worms, and small fish.



Oystercatcher (*Haematopus ostralegus*)
Non-breeding & breeding

96,000 breeding pairs of oystercatchers can be found in the UK, both around the coasts and inland. 305,000 wintering birds congregate on estuaries, making up a significant amount of the global population. They may also be found around shorelines. The mean population of oystercatchers within the Medway Estuary & Marshes SPA is 2,937 individuals, but numbers as high as 4,160 have been recorded. The Swale SPA has observed counts ranging from 3,293 up to 5,858 individuals. The mean population for the Thames Estuary & Marshes SPA is 26,350, but numbers as high as 33,959 have been observed. Their diet consists of mussels and cockles when by the coast, and worms when inland.



Pintail (*Anas acuta*)
Non-breeding

When classified in 1993, the Medway SPA supported internationally important numbers of this species, representing 1.4% of the North-Western Europe non-breeding population. At the time of classification this site was the most important area in north Kent for this species, with birds wintering from breeding areas in northern and central Europe, Asia, and North America typically arriving in October. Since classification there has been a decline in numbers on site. This decline does not track the regional or the national trend. Pintail feed on *hydrobia*, which can be found extensively across the Medway mudflats such as those surrounding Funton. The grazing marshes at Chetney Marshes in particular provide a good roosting area and also provide seeds which are also a favoured food source for the Pintail. Supporting habitats include coastal lagoons, freshwater and coastal grazing marsh, intertidal coarse/mixed sediments, intertidal mud, sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritimae*).

Bird habitat requirements



Pochard (*Aythya farina*)
Breeding

Pochards are part of the Medway Estuary & Marshes SPA's breeding bird and waterbird assemblages. The UK has only 700 breeding pairs of pochards, found mostly in England. During winter, this number increases to around 30,000 individuals, however milder winters in recent years have caused a decline in pochards migrating to the UK. These birds can be found on deeper bodies of water such as lakes, reservoirs, and estuaries, as they dive in search of food. Their diet ranges from plants and seeds to snails, small fish, and insects.



Red-throated diver (*Gavia stellata*)
Breeding

Red-throated divers are part of the Medway Estuary & Marshes SPA's breeding bird and waterbird assemblages. The breeding population of red-throated divers in the UK consists of only 1,250 pairs of birds, found mainly around lochs and lakes near the sea in the north of Ireland and western Scotland. The wintering population is much larger, with around 22,000 birds who can be found anywhere around the UK coast, although particularly common around the east coast. Red-throated divers feed mainly on fish.



Redshank (*Tringa totanus*)
Non-breeding & breeding

When classified in 1993, the Medway SPA supported internationally and nationally important numbers of this species, representing 2.7% of the East Atlantic Fly-away population and 5.5% of the British wintering population. Since classification there has been a decline in numbers.

This decline tracks the regional trend, but is greater than the national trend. Redshank feed predominantly on *Nereis* (polychaete worm), *Macoma* (saltwater clam), *Hydrobia* (marine snail) and *Corophium* (amphipod crustacean) on the mudflats, and in the creeks of the Medway SPA such as Nor Marsh and offshore of Ham green and Twinney. On high tides redshank move to the edges of the saltmarsh with important roost locations including those identified on the eastern Chetney Marshes and Swale sites. Supporting habitats include coastal lagoons, freshwater and coastal grazing marsh, intertidal coarse/mixed sediments, intertidal mud, sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritimae*).



Reed bunting (*Emberiza scheniculus*)
Breeding

Reed buntings are part of the Swale SPA's breeding bird assemblage. Around 275,000 breeding pairs of reed buntings can be found in the UK. These birds are most often found in reedbeds, however can also be seen in a range of other habitats including marshes, coasts, bogs, and farmland. They feed on seeds and insects.

Bird habitat requirements



Reed warbler (*Acrocerphalus scirpaceus*) Breeding

Reed warblers are part of the Swale SPA's breeding bird assemblage. Approximately 130,000 breeding pairs of reed warblers can be found in the UK. They are double brooded, laying two clutches of eggs in late spring and midsummer, before returning to Africa by mid-September. They are mostly found in reedbeds and riverside reed fringes in England, Wales and Eastern Ireland. They feed on insects and berries.



Ringed plover (*Charadrius hiaticula*) Non-breeding & breeding

When classified in 1993, the Medway SPA supported internationally important numbers of ringed plovers, representing 1.4% of the East Atlantic Flyway population and 3.2% of the British population. The number of individuals on this site has decreased since classification. This decline tracks the regional trend but is greater than the national trend. Important locations for ringed plover include Bishop's Island within the Medway channel, Hoo Flats on the Isle of Grain and at Ham Green and the Twinny and Riverside Country Park. Ringed Plover feed on the intertidal mudflats. Important prey species include *Gammarus*, *tubifex* worms and *Pisidium*. Saltmarsh provides roosting areas. Supporting habitats include coastal lagoons, freshwater and coastal grazing marsh, intertidal coarse/mixed sediments, intertidal mud, sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritimae*).



Shelduck (*Tadorna tadorna*) Non-breeding & breeding

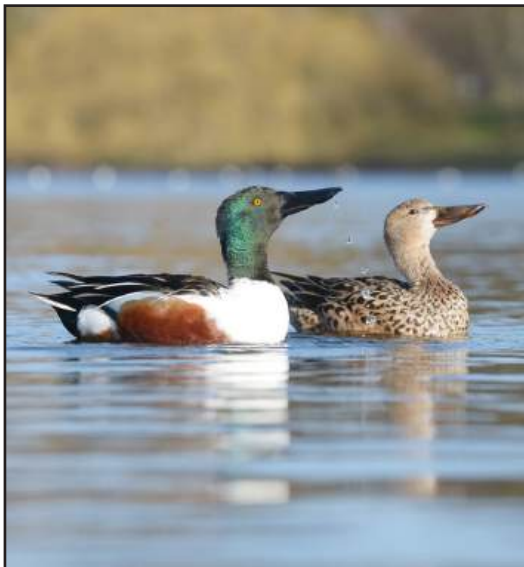
When classified in 1993, the Medway SPA supported internationally important numbers of shelducks, representing 2.3% of the North West European population and 7.9% of the British population. Numbers on site have decreased since classification. This decline tracks the regional trend but is greater than the national trend. Shelduck are widely distributed across the estuary. Important locations include Stoke Saltings, Hoo Flats and Hoo Marsh on the Isle of Grain and at Chetney Marshes, Ham Green and the Twinny, Riverside Country Park, Nor Marshes, Copperhouse Marshes and the surrounding creeks. They are also found on the islands of the Medway, such as Deadman's Island. Shelduck feed on the intertidal mudflats. Important prey species include *Nereis*, *Hydrobia* and *Corophium*. Supporting habitats include coastal lagoons, freshwater and coastal grazing marsh, intertidal coarse/mixed sediments, intertidal mud, sand and muddy sand, *Salicornia* and other annuals colonising mud and sand, *Spartina* swards (*Spartinion maritimae*).



Short-eared owl (*Asio flammeus*) Breeding

Short-eared owls are part of the Medway Estuary & Marshes SPA's breeding bird assemblage. 620 breeding pairs of short-eared owls are found in the UK, making them scarce. Their exact breeding locations change most years, but broadly they are found in grasslands, moorland, young forestry, and saltmarshes. They feed on small mammals, especially voles such as the field vole.

Bird habitat requirements



Shoveler (*Anas clypeata*)
Non-breeding & breeding

Around 1,100 breeding pairs of shovelers can be found in the UK, which increases to 20,000 individuals with the arrival of the wintering population. Populations of over 690 individuals have been observed at the Thames Estuary & Marshes SPA, and over 500 individuals at the Medway Estuary & Marshes and the Swale SPAs. These birds can be found mainly in lowland areas such as inland wetlands, coastal estuaries, floodplains, and wetlands. Their diet consists of zooplankton, small insects, and plant matter sifted from the water.



Teal (*Anas crecca*)
Non-breeding & breeding

Only around 4,000 breeding pairs of Teal are present in the UK, but an estimated 500,000 individuals migrate here in the winter. The overall population in the UK has increased in recent years, however their breeding range has decreased. Recent population counts of teal within the SPAs recorded a mean of 4,981 individuals for the Swale and 4,911 individuals for the Thames. These birds are found on reservoirs, floodplains, and wetlands. Their diet consists mostly of seeds and small invertebrates.



Turnstone (*Arenaria interpres*)
Non-breeding

Turnstones breed in the Arctic and are therefore primarily found in the UK in winter, with a wintering population size of approximately 43,000 individuals. Population counts for the SPAs in recent years identified a mean of 844 individuals at Thames, and 515 individuals at the Swale. These birds can be found at any coastal habitat but prefer rocky shores, as their feeding habits consist of turning over stones to look for food such as small crustaceans and insects. They are known to have an incredibly indiscriminate diet.



Whimbrel (*Numenius phaeopus*)
Non-breeding & breeding

Whimbrel are a feature of the waterbird assemblages for both the Medway and Thames Estuary & Marshes SPAs. Around 310 pairs of Whimbrel breed in the UK, being mainly confined to moorland in Shetland and Orkney. They spend winter in Europe and Africa, meaning the UK wintering population is less than 50 individuals. These birds may also be seen in coastal areas as they migrate. Their diet includes insects, snails and slugs when nesting, and crustaceans, shrimps, and molluscs when migrating.

Bird habitat requirements



White-fronted goose (*Anser albifrons*)
Non-breeding

Around 12,000 European white-fronted geese spend the winter months in the UK. The Swale SPA has seen a mean population of 332 individuals of this species in recent years. White-fronted geese can be found particularly around wetlands and farmlands, and feed on roots, shoots, tubers, leaves, grains, and oats.



Wigeon (*Mareca penelope*)
Non-breeding

The wintering population of wigeon in the UK has increased significantly since 1983/84 to over 450,000 individuals. Numbers of wigeon at the Swale have a recent mean value of 12,244 birds, but have fluctuated in the past from 7,000 to 40,000. The recent mean population for the Thames SPA is smaller, at 5,374. They gather in large numbers in habitats such as wet grassland, floodplains, reservoirs, lakes, and canals. Wigeons are primarily herbivores and feed on aquatic and terrestrial plants such as algae, duckweed, and grass.

References:

Atkinson, P. W., Austin, G. E., Burton, N. H. K., Musgrove, A. J., Pollitt, M. and Rehfisch, M. M. 2000. Changes in numbers of wintering waterbirds in the United Kingdom at national, country and Special Protection Area (SPA) scales. British Trust for Ornithology.

Austin, G.E., Calbrade, N.A., Mellan, H.J., Musgrove, A.J., Hearn, R.D., Stroud, D.A., Wotton, S.R. and Holt, C.A. 2014. Waterbirds in the UK 2012/13: The Wetland Bird Survey [Online]. Thetford: BTO/RSPB/JNCC.

Banks, A. N., Austin, G. E., Burton, N. H. K. and Mellan, H. J. 2005. Investigating possible movements of waterbirds between the Medway Estuary & Marshes SPA and neighbouring areas of the Thames and Swale Estuaries. Part 1.: British Trust for Ornithology.

British Trust for Ornithology (BTO). 2017. Personal Communication RE: Thames Estuary and Marshes WeBS counts 2010/11 to 2015/16.

Canal & River Trust Website.

Cook, A.S.C.P., Barimore, C., Holt, C.A., Read, W.J. and Austin, G.E. 2013. Wetland Bird Survey Alerts 2009/2010: Changes in the numbers of wintering waterbirds in the Constituent Countries of the United Kingdom, Special Protection Areas (SPAs) and Sites of Special Scientific Interest (SSSIs). Thetford: BTO/PSPB/JNCC.

Del Hoyo, J., Elliot, A. and Sargatal, J. 1996. Handbook of the Birds of the World, vol 3: Hoatzin to Auks., Barcelona, Lynx Edicions.

English Nature. 2000. Directive 79/409 on the conservation of wild birds: Special Protection Area – Thames Estuary and Marshes Citation

English Nature. 1993. Medway Estuary and Marshes (Kent): SSSI citation: English Nature.

English Nature. 2001. Medway Estuary and Marshes (Kent): SPA citation (UK9012031): English Nature.

English Nature. 2003. Swale and Medway European Marine site. English Nature's advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994.: English Nature.

Gordon, A. 2013. Nor Marsh and Motney Hill RSPB Management Plan 2008-2013 update.: Royal Society for the Protection of Birds

Johnsgard, P. A. 1981. The plovers, sandpipers and snipes of the world, Lincoln USA and London, University of Nebraska Press.

Kent Ornithological Society. 2014. Medway bird counts; various dates.: KMBRC.

Liley, D. and Fernley, H. 2011. Bird Disturbance Study, North Kent 2010.11: Footprint Ecology.

Liley, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

Liley, D., Lake, S. and Fearnley, H. 2012. Phase 1 - Bird Disturbance Report: Footprint Ecology; GGKM; Natural England.

Natural England, Designated Sites Viewer Website.

Robinson, R.A. 2005. BirdFacts: profiles of birds occurring in Britain & Ireland (BTO Research Report 407). [Online]. Thetford: British Trust for Ornithology Books.

Royal Society for the Protection of Birds (RSPB). 2015. Birds by name [Online].BTO, BirdFacts Species.

Royal Society for the Protection of Birds Website.

Spaans, B. and Postma, P. 2001. Inland pastures are an appropriate alternative for salt-marshes as a feeding area for spring-fattening Dark-bellied Brent Geese *Branta bernicla*. *Ardea*, 89, 426-440.

The Wildlife Trusts Website.

Ward, R. M. 2014. Dark-bellied brent goose in Britain 1960/61-1999/2000 Slimbridge: Wetland and Wildfowl Trust

Appendix G: Urbanisation assessment

G.1.1 Introduction

G.1.1.1 The assessment of urbanisation effects has taken into consideration the suitability of the habitat at each site allocation and within the surrounding area, alongside other factors listed below.

- Distance from the European site (sites closer to an SPA and/or Ramsar site are more likely to provide roosting and /or foraging opportunities for birds).
- Proximity to RSPB reserves.
- Availability of priority habitat which may provide habitat for features of SPA and Ramsar designations.
- Site characteristics including details on:
 - o Habitat type;
 - o Cropping regime, including how often the site is planted with a suitable crop;
 - o Visibility (for example are there unrestricted sight-lines);
 - o Details of any field boundaries (trees/hedgerows/field drains);
 - o Details of any permanent waterbodies, areas of seasonal flooding; and
 - o The size of the site.
- Details of any existing factors (where available) that may affect the habitat suitability, including:
 - o Existing public rights of way and their usage, especially by users with dogs;
 - o Proximity to existing built up areas; and
 - o Existing farming practices (for example the use of bird scarers/deterrents).
- Noise and visual disturbance drawing on the Waterbird Disturbance Tool Kit.
- Cat predation ranges.
- Presence of large and/or multiple overhead power lines.

Table G.1: Review of urbanisation effects - Chattenden and Hoo St Werburgh Allocations

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat and RSPB reserves	Review of impacts upon qualifying species / habitat and areas of FLL
HHH32	Residential 3	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites. However, the site has less than 10 proposed new net homes and therefore does not trigger consultation with Natural England.	The allocation comprises hedgerows and greenfield. A residential property sits within the southwestern corner of the site. There are no water features on site. There are no PRowS on the site or overhead pylons. Quarry ponds are located to the immediate north and south of the site. Residential development and woodland lies to the southwest.	There is no priority habitat on site. Coastal floodplain and grazing marsh is located approx. 10m to the south. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located on the Hoo Peninsula approximately 84m to the north of the Medway Estuary and Marshes SPA and Ramsar and approx. 5km to the south of the Thames Estuary and Marshes SPA and Ramsar. Based on a review of species habitat requirements, this allocation is unlikely to provide FLL for any species associated with the North Kent coastal designated sites. The agricultural fields, ponds and floodplain grazing marsh in the surrounding area may provide FLL for birds qualifying features when roosting / foraging inland. The site and surrounding landscape are unlikely to provide FLL for invertebrates or plants for which the Ramsar is notified. This allocation is separated from the SPA and Ramsar by hedgerows to its north and south and residential development to its south. These hedgerows are likely to restrict bird sight lines between the estuary and the allocation itself to the immediate south. The quarry and areas of residential development likely to be sources of disturbance. Development proposed at this allocation does not exceed the SSSI IRZ threshold – any residential development of 10 or more houses outside existing settlements/urban areas. However, given the proximity of this allocation to the Medway Estuary and Marshes SPA and Ramsar and areas of potential FLL it is possible that development at this location will disturb the avian qualifying species associated with these designations both at the SPA /

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat and RSPB reserves	Review of impacts upon qualifying species / habitat and areas of FLL
					Ramsar and also in areas of FLL. Therefore, an adverse urbanisation impact on the site integrity of the North Kent coastal designated sites from development at this allocation is possible with no mitigation.
HHH12	Residential 1801	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England.	The site comprises a number of agricultural fields and is located on the Hoo Peninsula. The southern section of the site includes parts of Cockham Woods. The Medway Estuary is located immediately adjacent and to the south of the site. Hoo Marina Park is located to the immediate south east. Hoo St Werburgh lies to the immediate north of the allocation. There are a number of PROW running through the site. There are no overhead pylons apparent on the mapping data.	Deciduous woodland priority habitat is located in the southern area of the site (associated with Cockham Woods) but this is not likely to support species associated with the North Kent Estuary coastal designations. There would be no other loss of priority habitat. Mudflats associated with the Medway Estuary and Marshes SPA and Ramsar are located to the immediate south east of the site. The allocation is not located in close proximity to an RSPB reserve.	The Medway Estuary SPA and Ramsar are located immediately adjacent to the south of this allocation. Development associated with Hoo St Werburgh and the Hoo Marina are likely to comprises sources of disturbance. Cockham Wood and the Hoo Marina are likely to be providing a visual barrier between the estuary designations and the agricultural fields which comprise this allocation. It is therefore unlikely that the fields which comprise this allocation provide FLL for avian qualifying features of the SPA or Ramsar. The agricultural fields are unlikely to provide FLL for invertebrates or plants for which the Ramsar is notified. This site is located immediately adjacent to other proposed site allocations around Hoo St Werburgh. Given the current open, low lying and rural of the peninsula, urbanisation effects associated with development of this scale, in close proximity to the Medway Estuary and Marshes SPA and Ramsar, is likely to have adverse urbanisation impacts upon the avian features for which the SPA and Ramsar are designated. It is unlikely that development at this site will have an adverse urbanisation impact upon species of plant or invertebrate for which the Ramsar is notified.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat and RSPB reserves	Review of impacts upon qualifying species / habitat and areas of FLL
HHH25	Residential 80	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has over 10 proposed new net homes.	The site comprises a grassed field with scattered trees. It is bound by a non-continuous hedgerow with mature trees in places. The surrounding land use comprises agricultural fields. Residential development associated with Hoo St Werburgh is located to the immediate west of this allocation. To the south, between the site and the Medway Estuary and Marshes SPA and Ramsar designation, lies a sand and gravel quarry with associated ponds. A PRoW runs along the site's eastern boundary. There are no overhead pylons apparent on the mapping data.	There would be loss of orchard priority habitat, but this is not likely to support species associated with the North Kent Estuary coastal designations. There would be no loss of other priority habitat. There is coastal and floodplain grazing marsh located approx. 437m to the south of the site (associated with the SPA and Ramsar) beyond a number of quarry ponds and some minor infrastructure. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located on the Hoo Peninsula approximately 600m to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 4.3km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. The PRoW and residential development to the immediate west of the site are likely to provide an existing source of disturbance. The hedgerows on site are likely to limit bird sight lines to some degree towards the estuary. The site itself is unlikely to provide FLL for qualifying birds. The site is bound by agricultural fields with ponds to the south. These surrounding agricultural fields have the potential to provide FLL for avian qualifying features of the SPA or Ramsar for activities such as foraging or roosting inland. The agricultural fields are unlikely however to provide FLL for invertebrates or plants for which the Ramsar is notified. This site is located immediately adjacent to other proposed site allocations around Hoo St Werburgh. Given the current open, low lying and rural of the peninsula, urbanisation effects associated with development of this scale, in close proximity to the Medway Estuary and Marshes SPA and Ramsar and areas of potential FLL, is likely to have adverse urbanisation impacts upon the avian features for which the SPA and Ramsar are designated. Given the distance of the site from the Medway Estuary and Marshes SPA and Ramsar, is unlikely that development at this site will have an adverse urbanisation

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat and RSPB reserves	Review of impacts upon qualifying species / habitat and areas of FLL
					impact upon species of plant or invertebrate for which the Ramsar is notified.
HHH24	Residential 85	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England.	The site comprises an agricultural field with a non-continuous hedgerow and trees down the centre of the site in a north to south direction. A farm building is in the centre of the site. This site is bound by agricultural fields with residential development associated with Hoo St Werburgh to the west. To the south, between the site and the Medway Estuary and Marshes SPA and Ramsar designation, lies a sand and gravel quarry with associated ponds. A PRoW runs through the centre of the site. There are no overhead pylons apparent on the mapping data.	There would be no loss of priority habitat. There is coastal and floodplain grazing marsh located approx. 651m to the south of the site (associated with the SPA and Ramsar) beyond a number of quarry ponds and some minor infrastructure. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located on the Hoo Peninsula approximately 800m to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 4.2km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. The PRoW and residential development to the immediate west of the site are likely to provide a source of disturbance. The hedgerows on site are likely to limit bird sight lines to some degree towards the estuary. The site itself is unlikely to provide FLL for qualifying birds. The site is bound by agricultural fields with ponds to the south. These surrounding agricultural fields have the potential to provide FLL for avian qualifying features of the SPA or Ramsar for activities such as foraging or roosting inland. The agricultural fields are unlikely however to provide FLL for invertebrates or plants for which the Ramsar is notified. This site is located immediately adjacent to other proposed site allocations around Hoo St Werburgh. Given the current open, low lying and rural of the peninsula, urbanisation effects associated with development of this scale, in close proximity to the Medway Estuary and Marshes SPA and Ramsar and areas of potential FLL, is likely to have adverse urbanisation impacts upon the avian features for which the SPA and Ramsar are designated. Given the distance of the site from the Medway Estuary and Marshes SPA and Ramsar, is unlikely that

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat and RSPB reserves	Review of impacts upon qualifying species / habitat and areas of FLL
					development at this site will have an adverse urbanisation impact upon species of plant or invertebrate for which the Ramsar is notified.
HHH6	Residential 550	The site is not located within the FLL SSSI IRZ associated with the North Kent coastal designated sites. Consultation with Natural England is therefore not required for development of this allocation.	The site comprises a number of agricultural fields. The fields are bound by hedgerows with the A228 forming the southern site boundary. There are no PRoW or overhead pylons apparent on the mapping data.	There would be loss of orchard priority habitat, but this is not likely to support species associated with the North Kent Estuary coastal designations. There would be no loss of other priority habitat. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located on the Hoo Peninsula approximately 1.5km to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 3.6km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. Residential development and roads are likely to provide existing sources of disturbance. The settlement of Chattenden and the A228 are likely to present a barrier to movement of birds between the Medway Estuary and Marshes SPA and Ramsar to the south and the Thames Estuary and Marshes SPA and Ramsar to the north and this allocation. The hedgerows on site are likely to limit bird sight lines towards the estuary. The site itself is unlikely to provide FLL for qualifying birds. It is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
HHH11	Residential 240	The site is not located within the FLL SSSI IRZ associated with the North Kent coastal designated sites.	The site is an agricultural field and is located on the Hoo Peninsula. The surrounding land use to the south and west of this allocation comprises residential areas associated with Hoo St Werburgh, road infrastructure including the	There will be no loss of priority habitat. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located on the Hoo Peninsula approximately 1.5km to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 4.7km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. Residential development, roads and the PRoW are likely to provide sources of disturbance.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat and RSPB reserves	Review of impacts upon qualifying species / habitat and areas of FLL
			A288 to the north, and agricultural fields to the west. There is one PRoW which runs along the north eastern site corner but no overhead pylons apparent on the mapping data.		The settlement of Hoo St Werburgh and road infrastructure are likely to present a barrier to movement of birds between the Medway Estuary and Marshes SPA and Ramsar to the south and the Thames Estuary and Marshes SPA and Ramsar to the north and this allocation. The hedgerows on site are likely to limit bird sight lines towards the estuary. The site itself is unlikely to provide FLL for qualifying birds or any notified features of the Ramsar. It is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
HHH33	Residential 330	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England.	The site comprises a number of agricultural fields with hedgerow present in places. This site is bound by agricultural fields. To the immediate south, between the site and the Medway Estuary and Marshes SPA and Ramsar designation, lies a sand and gravel quarry which is likely to be a source of disturbance. There is one PRoW which runs through the site. There are overhead pylons running through the centre of the site.	There would be no loss of priority habitat. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located on the Hoo Peninsula approximately 530m to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 4.3km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. The PRoW and the sand and gravel quarry to the south may be a source of disturbance. There are however clear sight lines into adjacent countryside from the site towards the estuary in a southerly direction and the site has the potential to provide FLL for avian qualifying features of the SPA or Ramsar for activities such as foraging or roosting inland. The agricultural fields are unlikely however to provide FLL for invertebrates or plants for which the Ramsar is notified. This site is located immediately adjacent to other proposed site allocations around Hoo St Werburgh.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat and RSPB reserves	Review of impacts upon qualifying species / habitat and areas of FLL
					Given the current open, low lying and rural of the peninsula, urbanisation effects associated with development of this scale, in close proximity to the Medway Estuary and Marshes SPA and Ramsar and areas of potential FLL, is likely to have adverse urbanisation impacts upon the avian features for which the SPA and Ramsar are designated. Given the distance of the site from the Medway Estuary and Marshes SPA and Ramsar, is unlikely that development at this site will have an adverse urbanisation impact upon species of plant or invertebrate for which the Ramsar is notified.
HHH5	Residential 50	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has 50 proposed new net homes. Therefore, the site triggers consultation with Natural England.	This site is located to the north of the River Medway. It is a grass field with a single development in the centre. The site is surrounded on all sides by woodland. A PRoW runs across the western site boundary through the site but no overhead pylons apparent on the mapping data.	No priority habitat will be lost. Adjacent priority habitat is deciduous woodland but this is unlikely to be associated for the qualifying features of the North Kent coastal designations. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located approximately 1.4km to the north west of the Medway Estuary and Marshes SPA and Ramsar and approximately 4.3km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. The PRoW is likely to provide a source of disturbance. The dense woodland surrounding this site on all sides will limit bird sight lines towards the estuary. The site itself is unlikely to provide FLL for qualifying birds or other qualifying features. It will also provide a buffer to other urbanisation effects upon the features of the North Kent coastal designations. It is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
HHH8	Residential 450	A small part of the site sits within the FLL	The site comprises a number of arable fields bound by	No priority habitat would be lost.	This allocation is located approximately 940m to the north of the Medway Estuary and Marshes SPA and Ramsar

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat and RSPB reserves	Review of impacts upon qualifying species / habitat and areas of FLL
		SSSI IRZ associated with the North Kent coastal designated sites and has over 50 proposed new net homes. Therefore, the site triggers consultation with Natural England.	hedgerows. The site is sandwiched between the A228 and the settlement of Hoo and Chattenden (including houses and road infrastructure), with Hoo primary school and playing fields to the immediate south east. The Deangate Ridge Country Park is located to the north and agricultural fields beyond residential development along Main Road to the south. No PRoWs or overhead pylons apparent on the mapping data.	The allocation is not located in close proximity to an RSPB reserve.	and approximately 4.6km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. Residential development and road infrastructure is likely to limit bird sight lines towards the estuary. The site itself is unlikely to provide FLL for qualifying birds. These features are also likely to present sources of disturbance. The screening of this allocation from the estuary to the south by existing development and infrastructure is likely to prevent urbanisation impacts upon the designated sites themselves. It is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
HHH41	Residential 25	The site is not located within the FLL SSSI IRZ associated with the North Kent coastal designated sites.	The site comprises developed industrial units and associated access infrastructure. It is bordered by arable fields to the south, beyond which is the settlement of Hoo, and the A228 to the north. A PRoWs runs along the site's south western boundary but there are no overhead pylons apparent on the mapping data.	No priority habitat would be lost. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located approximately 1.6km to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 4.7km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. Given the nature and location of this site it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat and RSPB reserves	Review of impacts upon qualifying species / habitat and areas of FLL
HHH22 & HHH31	Residential 1700	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England.	The site is comprised of a number of agricultural fields bound in parts with a non-continuous hedgerow and the occasional cluster of trees. Farm buildings are located in the centre of the western section of the site. This site is bound to the west and southwest by the residential development of Hoo. To the south, between the site and the Medway Estuary and Marshes SPA and Ramsar designation, lies agricultural fields and a sand and gravel quarry. The site is crossed by a number of PRoW. There are overhead pylons running through the centre of the site.	There would be no loss of priority habitat. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located on the Hoo Peninsula approximately 770m to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 5.8km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. The PRoWs may be a source of disturbance alongside residential development to the west. There are clear sight lines into adjacent countryside from the site towards the estuary in a southerly direction and the site has the potential to provide FLL for avian qualifying features of the SPA or Ramsar for activities such as foraging or roosting inland. The agricultural fields are unlikely however to provide FLL for invertebrates or plants for which the Ramsar is notified. This site is located immediately adjacent to other proposed site allocations around Hoo St Werburgh. Given the current open, low lying and rural of the peninsula, urbanisation effects associated with development of this scale, in close proximity to the Medway Estuary and Marshes SPA and Ramsar and areas of potential FLL, is likely to have adverse urbanisation impacts upon the avian features for which the SPA and Ramsar are designated. Given the distance of the site from the Medway Estuary and Marshes SPA and Ramsar, is unlikely that development at this site will have an adverse urbanisation impact upon species of plant or invertebrate for which the Ramsar is notified.

Table G.2: Review of urbanisation effects - Employment Allocations

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
HHH19	Employment Allocated for flexible employment-related uses. Exact use to be determined at planning application stage.	The majority of the site lies within the FLL SSSI IRZ associated with the North Kent coastal designated sites. Consultation with Natural England would only be triggered however for non-employment related end uses.	This site is located on the Hoo Peninsula and comprises agricultural land as is largely bordered by further agricultural land, as well as a road to its south, some employment developed land to its east, and a bike track to its west. The site is crossed by a number of PRoWs. There are no overhead power lines shown on the mapping data.	There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located on the Hoo Peninsula approximately 770m to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 5.8km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. The PRoWs may be a source of disturbance alongside residential development to the west. Given the distance of this site from the North Kent coastal designations and nature of proposed development it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
SM16	Employment Allocated for flexible employment-related uses. Exact use to be determined at planning application stage.	A small area of the site is located within the FLL SSSI IRZ associated with the North Kent coastal designated sites and it is an employment site. Consultation with Natural England would only be triggered however for non-employment related end uses.	The site comprises an area of currently developed land at Chatham Marina and a marina waterbody on the southern bank of the River Medway. The site is bound to the east, south and west by urban development. The River Medway is located to the north. There are no PRoW or overhead power lines shown on the mapping data.	There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however there is some mudflat priority habitat to the immediate northeast of the site. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located on the Hoo Peninsula approximately 600m to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 6.4km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. Development around the site is likely to pose a significant source of disturbance. The site itself will not provide FLL for any qualifying features of the North Kent coastal designations. Given the existing development at this site and the nature of proposed development it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
HHH35	Employment Allocated for flexible employment-related uses. Exact use to be determined at planning application stage.	The site lies within the FLL SSSI IRZ associated with the North Kent coastal designated sites which triggers consultation with Natural England for all planning applications.	This site is comprised of two parcels of land, which in turn are formed of a number of parcels of agricultural land, on the Hoo Peninsula to the west of Kingsnorth. There are some hedgerows around the agricultural fields, but these are not continuous and allow bird sight lines to the designated sites. The surrounding land use to the north, east and south is agricultural in nature. There are two PROW, one running along its eastern boundary and the other through the western area of the site. There is an overhead power cable on the site's southern boundary.	There would be no loss of priority habitat. Coastal and floodplain grazing marsh is located to the immediate east of the site. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located approximately 519m to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 3.9km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. To the immediate east and southeast of the site is the industrial development at Kingsnorth which is likely to be a source of existing disturbance. There is a sand and gravel quarry to the south west of the site, which is likely to be another source of disturbance. There are some hedgerows around the agricultural fields, but these are not continuous and allow bird sight lines to the designated sites. Development of this site has the potential to have urbanisation effects directly on species of bird for which the Medway Estuary and Marshes SPA and Ramsar are designated. The site and surrounding area also has the potential to provide FLL for bird species for activities such as foraging or roosting inland. The agricultural fields which comprise the site are unlikely however to provide FLL for invertebrates or plants for which the Ramsar is notified and there are unlikely to be urbanisation impacts upon these features due to the distance of the allocation from the Ramsar designation.
HHH36	Employment Site (known as MedwayOne) has consent for an energy	The site lies within the FLL SSSI IRZ associated with the North Kent coastal designated sites and is an employment site. Therefore, the site	The site is previously developed being located on the site of the former Kingsnorth power station. The southern part of the site is hard standing with the northern area being grassed	Development of this site would result in the loss of a small area of coastal and floodplain grazing marsh and deciduous woodland	This allocation is located on the Hoo Peninsula immediately adjacent to the Medway Estuary and Marshes SPA and Ramsar, with a very small area of designated land extending into the allocation boundary. The site comprises previously developed land and is within the former Kingsnorth power station site. There

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
	from waste facility (outline planning permission ref. MC/21/0979) but the rest of the consented floorspace is flexible.	triggers consultation with Natural England.	with scattered scrub and trees. There are no PROW on site. There is a PROW that runs along the western boundary of this site. There is an overhead power line running along the sites western boundary. The Medway Estuary is located immediately to the south of the allocation and industrial development to the immediate north.	priority habitat. The site has the potential to provide FLL for birds associated with the Medway Estuary and Marshes SPA. The allocation is not located in close proximity to an RSPB reserve.	are areas of coastal and floodplain grazing marsh on site. Development to the immediate north is likely to be a source of disturbance. The energy from waste facility at this site has received outline planning permission (MC/21/0979). This was supported by a Habitats Regulations Assessment¹. This HRA screened in construction and operational disturbance impacts upon the qualifying features of the Medway Estuary and Marshes SPA and Ramsar sites in terms of visual, lighting, noise and vibration impacts. The HRA prepared in support of the outline planning application for the site confirms that there are no intertidal or marine habitats on site and therefore it is unlikely to provide FLL habitat for the wetland invertebrates associated with the Ramsar designation. Development of this site has the potential to have urbanisation effects directly on species of bird and invertebrates for which the Medway Estuary and Marshes SPA and Ramsar are designated. It also has the potential to provide FLL for birds which the SPA and Ramsar have been designated.

¹ Aspect Ecology (December 2021) Report to Inform a Habitats Regulations Assessment and Appropriate Assessment. MedwayOne Kingsnorth Power Station.

Table G.3: Review of urbanisation effects - Gillingham North Allocations

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
GN6	Residential 400	The site lies within the FLL SSSI IRZ associated with the North Kent coastal designated sites which triggers consultation with Natural England for all planning applications.	The site comprises the Southern Gas site and marina boat parking. Areas surrounding the site to the east, west and south are heavily developed. Land to the immediate north is mudflat habitat associated with the River Medway. There are no PRoW or overhead power cables apparent on the site mapping data.	There is no priority habitat on site but there is mudflat priority habitat within the centre of the site (outside the site line boundary). The allocation is not located in close proximity to an RSPB reserve.	This allocation is located to the south of the River Medway approximately 55m to the west of the Medway Estuary and Marshes SPA and Ramsar and approximately 7.4km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. Given the proximity of this allocation to the Medway Estuary and Marshes SPA and Ramsar it is likely that there will be adverse urbanisation impacts from the development of this allocation upon all the qualifying features of the North Kent coastal designations and areas of adjacent potential FLL associated with the River Medway and mudflats.
GN3	Residential 176	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has over 50 proposed new net homes. Therefore, the site triggers consultation with Natural England.	The site comprises an area of developed land and car parking within an urban setting. Existing urban development is located on all sites of this site. There are no PRoW or overhead power cables apparent on the site mapping data.	There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. The allocation is not located in close proximity to an RSPB reserve.	This allocation is located to the south of the River Medway approximately 588m to the west of the Medway Estuary and Marshes SPA and Ramsar and approximately 7.4km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. Given the distance of this site from the North Kent coastal designations and existing urban development on all sides of this allocation, it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
GN15	Residential 1100	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and	The site comprises currently developed land and Gillingham Marina.	There would be no loss of priority habitat associated with the North Kent Estuary and Marshes	This allocation is located to the south of the River Medway approximately 100m to the west of the Medway Estuary and Marshes SPA and Ramsar and

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
		has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England.	Land use to the south, east and west of the site is developed. The River Medway is located to the immediate north of the site. There are no PRoW or overhead power cables apparent on the site mapping data.	designations. However, the site is located immediately adjacent to mudflat habitat which is present to both its east and west The allocation is not located in close proximity to an RSPB reserve.	approximately 7.2km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. Given the proximity of this allocation to the Medway Estuary and Marshes SPA and Ramsar it is likely that there will be adverse urbanisation impacts from the development of this allocation upon the qualifying features of the North Kent coastal designations and areas of adjacent potential FLL associated with the River Medway and mudflats.

Table G.4: Review of urbanisation effects - High Halstow Allocations

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
HHH26	Residential 760	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England.	The site lies approx. 380m to the south east of the Northward Hill RSPB Nature Reserve. The site comprises a number of agricultural fields, bound by hedgerows, to the immediate east of residential development at High Halstow. The A228 marks the eastern site boundary. There is a PRoW which runs through the site but no overhead power cables apparent on the site mapping data.	There will be no loss of priority habitat. The site is located approx. 380m from the RSPB reserve at Northward Hill.	This site is located on the Hoo Peninsula and approximately 1.5km to the south of the Thames Estuary and Marshes SPA and Ramsar and approximately 2.8km to the north of the Medway Estuary and Marshes SPA and Ramsar designations. It is however approx. 380m to the southeast of the Northward Hill RSPB Nature Reserve. Both the A228 and the residential development to the west are likely to be sources of disturbance. The surrounding land use is agricultural in nature. The PRoW is likely to provide a source of disturbance. There are clear sight lines into adjacent countryside from the site towards the Thames estuary in a northerly direction towards the Northward Hill RSPB reserve. The site has the potential to provide FLL for avian qualifying features of the SPA or Ramsar for activities such as foraging or roosting inland. The agricultural fields are unlikely however to provide FLL for invertebrates or plants for which the Ramsar is notified. Given the site's proximity to the RSPB reserve at Northward Hill and the current open, low lying and rural of the peninsula, urbanisation effects associated with development of this scale, in close proximity to the Thames Estuary and Marshes SPA and Ramsar and areas of potential FLL, is likely to have adverse urbanisation impacts upon the avian features for which the SPA and Ramsar are designated.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
					Given the distance of the site from the Medway and Thames Estuary and Marshes SPA and Ramsar designations, is unlikely that development at this site will have an adverse urbanisation impact upon species of plant or invertebrate for which the Ramsar is notified.
HHH29	Residential 55	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has over 10 proposed new net homes. Therefore, the site triggers consultation with Natural England.	The site lies approx. 1.1km to the south east of the Northward Hill RSPB Nature Reserve. The site comprises a grassed field bound by hedgerows and mature trees and a yard. The A228 runs to the east. Residential development at High Halstow is located to the west. The surrounding land use is agricultural in nature. A PRoW runs along the site's western boundary but there are no overhead power cables shown on site.	There will be no loss of priority habitat. The site is located approx. 1.1km to the southeast of the Northward Hill RSPB Nature Reserve.	This site is located on the Hoo Peninsula and approximately 2.2km to the south of the Thames Estuary and Marshes SPA and Ramsar and approximately 3km to the north of the Medway Estuary and Marshes SPA and Ramsar designations. It is however approx. 1.1km to the southeast of the Northward Hill RSPB Nature Reserve. Both the A228 and the residential development to the west are likely to be sources of disturbance. The surrounding land use is agricultural in nature. There is a PRoW which runs through the site which is likely to provide a source of disturbance. There are clear sight lines into adjacent countryside from the site towards the Thames estuary in a northerly direction towards the Northward Hill RSPB reserve. The site has the potential to provide FLL for avian qualifying features of the SPA or Ramsar for activities such as foraging or roosting inland. The agricultural fields are unlikely however to provide FLL for invertebrates or plants for which the Ramsar is notified. Given the site's proximity to the RSPB reserve at Northward Hill and the current open, low lying and rural of the peninsula, urbanisation effects associated with development of this scale, in close proximity to the Thames Estuary and Marshes SPA and Ramsar and areas of potential FLL, is likely to have adverse

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
					urbanisation impacts upon the avian features for which the SPA and Ramsar are designated. Given the distance of the site from the Medway and Thames Estuary and Marshes SPA and Ramsar designations, is unlikely that development at this site will have an adverse urbanisation impact upon species of plant or invertebrate for which the Ramsar is notified.
HHH15	Residential 5	The site does not sit within the FLL SSSI IRZ associated with the North Kent coastal designated sites.	The current land use is rural settlements, bordered by agricultural land to the south and Cooling Road to the north. There are no PRoW or overhead power cables on site.	There will be no loss of priority habitat. The site is located approx. 370m to the south of the RSPB reserve at Northward Hill.	This allocation is located on the Hoo Peninsula approximately 3.5km to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 1.7km to the south of the Thames Estuary and Marshes SPA and Ramsar designations. Given the distance of this site from the North Kent coastal designations, the scale of proposed development and its location to the southwest of High Halstow, it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.

Table G.5: Review of urbanisation effects - Lower Rainham Allocations

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
RN17	Residential 32	The site is located within the FLL SSSI IRZ associated with the North Kent coastal designated sites. As the development is in a rural setting, and has over 10 proposed new net homes, it triggers consultation with Natural England.	The site is currently a field of green space, bordered by trees, green fields and residential development. There are no PRoW or overhead power cables on site.	There would be loss of orchard priority habitat, but this is not likely to support species associated with the North Kent Estuary coastal designations. There would be no loss of other priority habitat. The site is not located in close proximity to an RSPB reserve.	This allocation is located to the south of the Medway Estuary, approximately 360m to the south of the Medway Estuary and Marshes SPA and Ramsar. The Lower Rainham Road and residential development between this allocation and the Medway Estuary and Marshes SPA and Ramsar are likely to provide sources of disturbance and limit bird sight lines. The site itself and surrounding land is unlikely to provide FLL. Given the location and scale of proposed development, it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
RN23	Residential 75	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites and has over 50 proposed new net homes. Therefore, the site triggers consultation with Natural England.	The site is comprised of scrub habitat with woodland and hedgerow or residential development forming the site boundaries. Residential development (of Rainham) forms the northern, eastern and southern boundaries. There are no PRoW or overhead power cables on site.	There would be no loss of priority habitat. The site is not located in close proximity to an RSPB reserve.	This allocation is located to the south of the Medway Estuary, approximately 360m to the south of the Medway Estuary and Marshes SPA and Ramsar. The Lower Rainham Road and residential development between this allocation and the Medway Estuary and Marshes SPA and Ramsar are likely to provide sources of disturbance and limit bird sight lines. The site itself and surrounding land is unlikely to provide FLL. Given the location and scale of proposed development, it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
RN25	Residential 5	The site is located within the FLL SSSI IRZ associated with the North Kent coastal designated sites. It does not however trigger consultation for development due to the scale of development. Considering the nature and location of the site and its location in the wider landscape, it is considered to provide suitable FLL. LSE due to urbanisation effects upon both designated sites and areas of FLL are screened in.	The site is comprised of scrub habitat with residential development in the eastern area of the site. Residential development (of Rainham) forms the northern, eastern and western boundaries. There are no PRoW or overhead power cables on site.	There would be no loss of priority habitat. The site is not located in close proximity to an RSPB reserve.	This allocation is located to the south of the Medway Estuary, approximately 360m to the south of the Medway Estuary and Marshes SPA and Ramsar. The Lower Rainham Road and residential development between this allocation and the Medway Estuary and Marshes SPA and Ramsar are likely to provide sources of disturbance and limit bird sight lines. The site itself and surrounding land is unlikely to provide FLL. Given the location and scale of proposed development, it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
RN9	Residential 800	The site is located within the FLL SSSI IRZ associated with the North Kent coastal designated sites. As the development is in a rural setting, and has over 10 proposed new net homes, it triggers consultation with Natural England.	The site comprises a few small units of commercial developed land and multiple agricultural fields, separated by hedgerows and small roads. Land to the south of the site is residential. Land to the north of the western block of this site is agricultural.	There would be no loss of priority habitat. The site is not located in close proximity to an RSPB reserve.	This allocation is located to the south of the Medway Estuary, approximately 185m to the south of the Medway Estuary and Marshes SPA and Ramsar. In the eastern area of this site, the Lower Rainham Road and residential development between this allocation and the Medway Estuary and Marshes SPA and Ramsar are likely to provide sources of disturbance and limit bird sight lines. The eastern section of the site and surrounding land is unlikely to provide FLL. Bird sight lines are however present from the western area of this site to the Medway Estuary. The eastern

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
			Land to the north of the eastern block of this site is residential. There is one PRow running through the eastern section of the site but no overhead power cables on site.		section of the site, and fields to its north, have the potential to provide FLL for avian qualifying features of the SPA or Ramsar for activities such as foraging or roosting inland. The agricultural fields and site are unlikely however to provide FLL for invertebrates or plants for which the Ramsar is notified. Given the site's proximity to the Medway Estuary and Marshes SPA and Ramsar, urbanisation effects associated with development of this scale is likely to have adverse urbanisation impacts upon the avian features for which the SPA and Ramsar are designated. Given the distance of the site from the Medway and Thames Estuary and Marshes SPA and Ramsar designations, is unlikely that development at this site will have an adverse urbanisation impact upon species of plant or invertebrate for which the Ramsar is notified.

Table G.6: Review of urbanisation effects - Rural Settlement site Allocations

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
AS25	Residential 34	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites. As proposed over 10 new net homes, consultation with Natural England is triggered.	The site comprises previously developed land and is located on the Hoo Peninsula. The site is bound on three sides by residential development and on the third by an agricultural field. There are no PRoW or overhead power cables on site.	There will be no loss of priority habitat. The site is not located in close proximity to an RSPB reserve.	This allocation is located approximately 588m to the east of the Thames Estuary and Marshes SPA and Ramsar designations and approximately 830m to the northeast of the Medway Estuary and Marshes SPA and Ramsar designations. The site itself and land within the immediate surrounding area is unlikely to provide FLL. Given the location and proximity of this allocation to existing development at the Isle of Grain, the existing land use and scale of development, it is considered unlikely that there will be adverse urbanisation impacts from development at this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
SR7	Residential 44	The site sits partly within the FLL SSSI IRZ associated with the North Kent coastal designated sites. As it is in a rural location and there are over 10 proposed new net homes, the site triggers consultation with Natural England.	The site comprises a number of agricultural fields to the immediate northwest of the settlement of Cliffe Wood. Hedgerows form site boundaries. The surrounding land use to the north and west is agricultural. The fields to the north are bound by hedgerows in some instances. Residential areas form the eastern and southern site boundaries. There is a PRoW which runs through the centre of the site	No priority habitat would be lost. The site is approx. 1.3km to the south east of the RSPB reserve at Higham Marshes.	This allocation is located approximately 839m to the south of the Thames Estuary and Marshes SPA and Ramsar designations and approximately 4.5km to the northwest of the Medway Estuary and Marshes SPA and Ramsar designations. The site itself and land within the immediate surrounding area is unlikely to provide FLL. The adjacent residential area is likely to be a source of disturbance. Given the location and proximity of this allocation to existing development at Cliffe Woods, the existing land use, scale of development and distance from designated sites, it is considered unlikely that there will be adverse urbanisation impacts from development at this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
			in a northeast / southwest direction. There are no overhead power cables.		
AS11	Residential 10	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites. As it is in a rural location and there are 10 proposed new net homes, the site triggers consultation with Natural England.	The site is located on the Hoo Peninsula and is an arable field surrounded to the north, south and east by residential development. Agricultural land lies to the east. There are no PRow or overhead power cables on site.	There will be no loss of priority habitat. The site is not in close proximity to an RSPB reserve.	This allocation is located approximately 3km to the south of the Thames Estuary and Marshes SPA and Ramsar designations and approximately 658m to the northwest of the Medway Estuary and Marshes SPA and Ramsar designations. The site itself and land within the immediate surrounding area is unlikely to provide FLL. The adjacent residential area is likely to be a source of disturbance. Given the location and proximity of this allocation to existing development at Upper Stoke, the existing land use, scale of development and distance from designated sites, it is considered unlikely that there will be adverse urbanisation impacts from development at this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
SR4	Residential 130	The site does not sit within the FLL SSSI IRZ associated with the North Kent coastal designated sites.	The site comprises arable fields bound by hedgerows. The site is located to the immediate south of the residential areas of Cliffe Wood. There are no PRow or overhead power cables on site.	No priority habitat would be lost. The site is approx. 1.7km to the south east of the RSPB reserve at Higham Marshes.	This allocation is located approximately 1.4km to the south of the Thames Estuary and Marshes SPA and Ramsar designations and approximately 6km to the northwest of the Medway Estuary and Marshes SPA and Ramsar designations. The site itself and land within the immediate surrounding area is unlikely to provide FLL. The adjacent residential area is likely to be a source of disturbance. Given the location and proximity of this allocation to existing development at Cliffe Woods, the existing land use, scale of development and distance from designated sites, it is considered unlikely that there will be adverse

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
					urbanisation impacts from development at this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
SR14	Residential 49	The site does not sit within the FLL SSSI IRZ associated with the North Kent coastal designated sites.	The site comprises a number of arable fields bound by hedgerows. The site is located to the immediate south of the residential areas of Cliffe Wood. There are no PRoW or overhead power cables on site.	No priority habitat would be lost. The site is approx. 1.9km to the south east of the RSPB reserve at Higham Marshes.	This allocation is located approximately 1.4km to the south of the Thames Estuary and Marshes SPA and Ramsar designations and approximately 6km to the northwest of the Medway Estuary and Marshes SPA and Ramsar designations. The site itself and land within the immediate surrounding area is unlikely to provide FLL. The adjacent residential area is likely to be a source of disturbance. Given the location and proximity of this allocation to existing development at Cliffe Woods, the existing land use, scale of development and distance from designated sites, it is considered unlikely that there will be adverse urbanisation impacts from development at this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
SR51	Residential 250	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites. As there are over 10 proposed new net homes, the site triggers consultation with Natural England.	The site comprises a number of agricultural fields with hedgerow present in places. This site is bound by agricultural fields with the residential area of Cliffe to the east. The site is crossed by a PRoW. These may be a source of disturbance. No overhead power cables were apparent on the mapping data for this site.	There would be no loss of priority habitat. The site is located approximately 640m to the east of the RSPB reserve at Cliffe Pool.	This allocation is located on the Hoo Peninsula immediately adjacent to the Thames Estuary and Marshes SPA and Ramsar designations. The PRoW and residential development to the immediate east of the site are likely to provide a source of disturbance. The site and surrounding agricultural fields are likely to provide FLL for avian qualifying features of the SPA or Ramsar for activities such as foraging or roosting inland. The agricultural fields are unlikely however to provide FLL for invertebrates or plants for which the Ramsar is notified.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
					Given the proximity of the site to the Thamas Estuary and Marshes SPA and Ramsar, the current open, low lying and rural of the peninsula, proximity to Cliffe Pools RSPB reserve, urbanisation effects associated with development of this scale is likely to have adverse urbanisation impacts upon the avian and invertebrate features for which the SPA and Ramsar are designated and potential FLL.

Table G.7: Review of urbanisation effects - Other Site Allocations

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
AS2	Residential 4	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites. However, the site does not trigger consultation with Natural England, as there are less than 10 proposed new net homes.	The site is developed. The surrounding land use comprises residential areas and agricultural fields. There are no PRoWs on site. There are no overhead cables on the site.	There will be no loss of priority habitat. The site is located approximately 1.5km to the southeast of the RSPB reserve at Northward Hill.	This allocation is located approximately 2.6km to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 2.5km to the south of the Thames Estuary and Marshes SPA and Ramsar. Given the nature of the site, its location, the scale of proposed development and its proximity to existing development along the A228 it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
AS6	Residential 60	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites. As the site has over 10 proposed new net homes, the site triggers consultation with Natural England.	The site comprises a greenfield and parking area. The surrounding land use comprises residential areas beyond which are agricultural fields. There are no PRoWs on site. There are no overhead cables on the site.	There will be no loss of priority habitat. The site is located approximately 1.5km to the southeast of the RSPB reserve at Northward Hill.	This allocation is located approximately 2.6km to the north of the Medway Estuary and Marshes SPA and Ramsar and approximately 2.5km to the south of the Thames Estuary and Marshes SPA and Ramsar. Given the nature of the site, its location, the scale of proposed development and its proximity to existing development along the A228 it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
AS28	Residential 9	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites. However, the site does not trigger consultation	The site comprises a greenfield and is located on the Hoo Peninsula. The surrounding land use comprises residential areas, agricultural fields, scrub and coastal and floodplain grazing	There will be no loss of priority habitat. The site borders areas of coastal and floodplain grazing marsh which is to the immediate east.	This allocation is located within 200m of the Medway and Thames Estuaries SPA and Ramsar designations and adjacent to areas of coastal and floodplain grazing marsh. This allocation therefore has the potential to have adverse urbanisation impacts upon both the North Kent coastal designated sites themselves and also upon areas of FLL.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
		with Natural England, as there are less than 10 proposed new net homes.	marsh. There is a PRow which runs down the site's eastern boundary. There are no overhead power cables.	The site is not located in close proximity to an RSPB reserve.	
SR49	Residential 6	The site sits within the FLL SSSI IRZ associated with the North Kent coastal designated sites. However, as the site has less than 10 proposed new net homes, the site does not trigger consultation with Natural England.	The site is located on the northern bank of the River Medway and is currently developed. The surrounding land use urban on all sides. These features present sources of disturbance and likely barriers to bird sight lines. There are no PRowS across the site or overhead power cables.	There is no priority habitat within the site boundary however mudflat priority habitat is located on the bank of the River Medway immediately adjacent to the site. The site is not located in close proximity to an RSPB reserve.	This allocation is located within 1km to the west of the Medway Estuaries SPA and Ramsar designations. It is however located immediately adjacent to an area of mudflat priority habitat. This allocation therefore has the potential to have adverse urbanisation impacts upon areas of FLL associated with the North Kent coastal designated sites.
GN8	Residential 17	The site is located within the FLL SSSI IRZ associated with the North Kent coastal designated sites. However, as the site has less than 50 proposed new net homes, it does not trigger consultation with Natural England.	The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. There are no PRowS across the site or overhead power cables.	There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. The site is not located in close proximity to an RSPB reserve.	This allocation is located approximately 430m to the west of the Medway Estuary and Marshes SPA. Given the nature of the site, its location, the scale of proposed development and its proximity to existing urban development in Gillingham, it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
AS10	Residential 5	The site sits within the FLL SSSI IRZ	The site is located on the Hoo Peninsula and is currently	There will be no loss of priority habitat.	This allocation is located approximately 606m to the west of the Medway Estuary and Marshes SPA.

Site Allocation Name and Code	Proposed end use	IRZ trigger	Land use on site and within surrounding area	Priority habitat	Review of impacts upon qualifying species / habitat and areas of FLL
		associated with the North Kent coastal designated sites, however consultation with Natural England is not triggered due to the number of homes.	developed. The surrounding land use comprises residential areas and agricultural fields. There are no PRoWs across the site or overhead power cables.	The site is not located in close proximity to an RSPB reserve.	Given the nature of the site, its location, the scale of proposed development and its proximity to existing urban development in Upper Stoke, it is considered unlikely that there will be adverse urbanisation impacts from the development of this allocation upon the North Kent coastal designations or areas of FLL associated with these designations.
SR48	Residential 8	The site is located within the FLL SSSI IRZ associated with the North Kent coastal designated sites. However, as the site has less than 50 proposed new net homes, it does not trigger consultation with Natural England. Taking a precautionary approach the site is screened in due to its location.	The site comprises an area of hardstanding boat storage within an urban setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. There are no PRoWs across the site or overhead power cables.	There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations; however the site is located adjacent to mudflat priority habitat. The site is not located in close proximity to an RSPB reserve.	This allocation is located within 1.2km to the west of the Medway Estuaries SPA and Ramsar designations. It is however located immediately adjacent to an area of mudflat priority habitat. This allocation therefore has the potential to have adverse urbanisation impacts upon areas of FLL associated with the North Kent coastal designated sites.

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys

Biodiversity Net Gain



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