

Medway Council

Medway Local Plan Development Strategy

Interim Consideration of the
Implications of Development
Strategy Scenarios on European Sites

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Executive Summary

Medway Council is preparing a new Local Plan covering the period from 2012 to 2035, which will replace the existing adopted Local Plan. It seeks to meet significant development needs to support projected growth over the plan period. The council has prepared a Development Strategy (hereafter referred to as 'the plan'), including four options to meet the area's growth needs alongside draft policies. Ove Arup & Partners Ltd has produced this Habitats Regulations Assessment (HRA) on behalf of Medway Council to assess the effects of the Development Strategy on European designated sites. The purpose of this HRA is to ensure that the plan maintains the integrity of European sites in line with the requirements of the Habitats Regulations.

Natural England's consultation response on the Local Plan Development Options HRA Screening Report was reviewed. Furthermore, a stakeholder workshop was held in January 2018 with Medway Council, Natural England, Kent Wildlife Trust and the RSPB in attendance to discuss the scope of the HRA.

The plan consultation comprises the third Regulation 18 consultation stage for the Local Plan. Four scenarios are set out for the consultation, with a rural town centred on Hoo St Werburgh included in all of the development scenarios. Scenario 1 delivers an objectively assessed need for housing of 29,463 homes over the plan period. Scenario 2 follows the development strategy set out at Scenario 1, but explicitly considers the implications and approach to masterplanning and design that could arise from the introduction of a new passenger rail service and stations. Scenario 3 meets the Government's challenging calculation of local housing need of 37,143 homes. Scenario 4 includes development within Lodge Hill SSSI.

All European sites within Medway are considered in the HRA, in addition to those within the influence of the plan in terms of possible significant effects through a known impact pathway. This applies specifically to Medway and Thames Estuary and Marshes Special Protection Areas (SPA)/Ramsar sites, North Downs Woodlands, Peter's Pit and Queendown Warren Special Areas of Conservation (SAC) and The Swale SPA/Ramsar. Natural England's SSSI Impact Risk Zones (IRZs) which have been reviewed to identify supporting habitat to European sites, forecast changes to traffic flows were derived from Medway's Strategic Transport Assessment and air quality information was obtained from the APIS and Defra websites. The draft site allocations and policies were screened for likely significant effects on European sites, alone and in combination with other plans and projects. An Appropriate Assessment (AA) has been undertaken on any such effects, including a high level air quality assessment. The report also provides a comparative review of the four scenarios.

The screening assessment identified a range of policies and site allocations that should be subject to AA. Likely significant effects were identified with respect to Medway and Thames Estuary and Marshes and The Swale SPA/Ramsar sites and North Downs Woodlands and Peter's Pit SACs due to habitat loss and fragmentation, disturbance, reduced water levels and quality and reduced air quality. Queendown Warren SAC was screened out of the AA as no likely significant effects, either alone or in combination with other plans and projects, were identified.

The incorporation of measures described in this document, including further assessment as required through project level HRAs, would ensure that the plan would not hinder European sites from achieving their conservation objectives. However, further air quality

assessment is required to inform selection of the preferred option and establish whether likely significant effects associated with predicted increases in the deposition of nitrogen at Medway and Thames Estuary and Marshes SPA/Ramsar sites and North Downs Woodlands SAC would lead to adverse impacts on integrity.

The assessment indicates that scenario 3 is the least preferable option, followed by scenario 1. Scenarios 2 and 4 provide the best options, both in terms of potential impacts on supporting habitats associated with the north Kent marshes and significant effects associated with increased nitrogen deposition on Medway and Thames Estuary and Marshes SPA/Ramsar sites and North Downs Woodlands SAC.

Strategic air quality modelling is planned for the coming months, the results of which would be incorporated into this report and the assessment updated and submitted during the consultation to inform selection of the preferred option.

1 Introduction

Medway Council is preparing a new Local Plan covering the period from 2012 to 2035, which will replace the existing adopted Local Plan¹. It seeks to meet significant development needs to support projected growth over the plan period, including approximately 30,000 new homes, land for employment and retail, supported by a range of infrastructure improvements, whilst protecting the area's natural and historic environment.

The council has prepared a Development Strategy (hereafter referred to as 'the plan'), including four options to meet the area's growth needs alongside draft policies to deliver the vision set for Medway in 2035. Ove Arup & Partners Ltd has produced this Habitats Regulations Assessment (HRA) on behalf of Medway Council to assess the effects of the Development Strategy on European designated sites.

1.1 Legislation

1.1.1 The Habitats Directive and The Conservation of Habitats and Species Regulations

The requirement for HRA is established by the Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora²), which is transposed into UK law by The Conservation of Habitats and Species Regulations 2017³ (hereafter referred to as the 'Habitats Regulations').

Article 6 (3) of the Habitats Directive 1992 states that:

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."

Regulation 63(1) of the Habitats Regulations states that:

"A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

(b) is not directly connected with or necessary to the management of that site,

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives."

Regulation 63(5) states:

"In the light of the conclusions of the assessment, and subject to regulation 64, the competent authority may agree to the plan or project only after having ascertained that it

¹ Medway Council, (2003); 'Medway Local Plan.' Adopted 14th May 2003.

² European Commission, (1992); 'Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.' Available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31992L0043:EN:HTML>

³ Her Majesty's Stationary Office (HMSO), (2017); 'The Conservation of Habitats and Species Regulations.'

will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).”

This Shadow HRA provides Medway Council, as competent authority, with sufficient information to undertake an appropriate assessment (AA). European sites, or Natura 2000 sites, as defined under the Habitats Regulations, are Special Areas of Conservation (SACs) designated under the Habitats Regulations and Special Protection Areas (SPAs) designated under the Directive 2009/147/EC on the conservation of wild birds (codified version), (Birds Directive), which originally came into force in April 1979. Of relevance to this report, as a matter of UK Government policy, sites designated under the Convention on Wetlands 1971 (the Ramsar Convention)⁴, known as Ramsar Sites, are also included within the consideration of European sites.

1.1.2 European Air Quality Management

In 1996, the European Commission published the Air Quality Framework Directive on ambient air quality assessment and management (96/62/EC)⁵. This Directive defined the policy framework for 12 air pollutants known to have harmful effects on human health and the protection of vegetation. Limit values (pollutant concentrations not to be exceeded by a certain date) for each specified pollutant were set through a series of Daughter Directives, including Directive 1999/30/EC (the 1st Daughter Directive)⁶, which sets limit values for sulphur dioxide (SO₂), nitrogen dioxide (NO₂) and oxides of nitrogen (NO_x), particulate matter (PM₁₀) and lead in ambient air.

In May 2008, the Directive 2008/50/EC⁷ on ambient air quality and cleaner air for Europe came into force. The Directive has been transposed into national legislation in England by the Air Quality Standards Regulations 2010⁸. This legislation sets a standard for annual mean NO_x concentrations of 30µg/m³ for the protection of vegetation. As a precautionary approach, this standard is generally applied to designated sites where vegetation is included as part of their designation.

1.2 Process of Habitats Regulations Assessment for Plans

The HRA process is divided into the following four stages:

- Stage 1 Screening - An assessment of likely significant effects of a plan on European sites either alone or in-combination with other plans and projects;
- Stage 2 Appropriate Assessment - Where it is not possible to rule out likely significant effects during Stage 1, it is necessary to undertake an AA as set out in Regulation 63 (1) of the Habitats Regulations (refer to Section 1.1). This considers the implications of a plan in view of the European site’s conservation objectives, either alone or in-combination with other plans and projects, taking into account

⁴ United Nations Educational, Scientific and Cultural Organization (UNESCO), (1994); ‘Convention on Wetlands of International Importance especially as Waterfowl Habitat. Ramsar, Iran, 2.2.1971 as amended by the Protocol of 3.12.1982 and the Amendments of 28.5.1987.’

⁵ Directive 96/62/EC of 27 September 1996 on ambient air quality assessment and management

⁶ Directive 1999/30/EC of 22 April 1999 relating to limit values for sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air

⁷ Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe

⁸ The Air Quality Standards Regulations 2010, SI 2010/1001

mitigation measures. This provides the competent authority (Medway Council) with sufficient information to determine whether the plan has an adverse impact on the integrity of European sites, which is also referred to as the 'integrity test';

- Stage 3 Alternative solutions - Where adverse effects on integrity cannot be mitigated, it is necessary to consider alternative solutions that would not give rise to these effects. The plan may only proceed if there are no alternative solutions; and
- Stage 4 Imperative reasons for overriding public interest (IROPI) and compensatory measures – If no alternatives are identified during Stage 3, the plan may only proceed in exceptional circumstances, if pursuit of the option is also justified by IROPI. In this case, compensatory measures must be put in place to offset adverse effects on integrity.

This HRA comprises the first two stages of this process, identifying likely significant effects and setting out appropriate measures to mitigate such effects. Providing that it can be demonstrated that, with appropriate mitigation measures, the plan would not give rise to an adverse effect on the integrity of a European site, the plan can proceed. In this case, it is not necessary to consider stages 3 and 4, which are collectively referred to as 'derogation'.

1.3 Purpose of this Report

The purpose of this HRA is to ensure that the plan maintains the integrity of European sites in line with the requirements of the Habitats Regulations. This report provides information to allow Medway Council to undertake an AA of the Development Strategy in their role as the Competent Authority, in accordance with Regulation 63(2) of the Habitats Regulations (refer to Section 1.1).

1.4 Aims

This document fulfils the following objectives:

- Identify elements of the plan that have a potential to result in significant effects on European sites, considering the implementation of initial mitigation measures;
- Assess the implications of these elements of the plan in view of the conservation objectives of European sites;
- Assess the significance of effects in-combination with other plans and projects;
- Consider the implementation of mitigation measures within the plan to offset significant effects; and
- Consider the implications of the plan on the integrity of European sites.

1.5 Sections of the Report

This report comprises the following sections:

- Section 2 – describes the background to the HRA;
- Section 3 – describes the stages of consultation relating to the HRA and the outcomes where relevant to this report;
- Section 4 - describes the plan;

- Section 5 – outlines the methodology for stage 1 screening and stage 2 AA;
- Section 6 – describes the results of the screening assessment, identifying European sites, impact types and in-combination plans and projects considered in the assessment and the elements of the plan considered to have likely significant effects on European sites;
- Section 7 – documents the results of the AA, identifying significant effects and setting out mitigation measures required to avoid adverse effects on integrity; and
- Section 8 – provides a summary and conclusions.

2 Background

Previous iterations of the Medway Local Plan have been subject to HRA. The Medway Submission Draft Core Strategy (2006-2028) was published in January 2012 and an HRA (AA)⁹ was produced in December 2011. The Core Strategy set out draft policies and a strategy for development focussed on large waterfront regeneration sites and a new settlement at Lodge Hill. Lodge Hill was subsequently designated as Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI) because of its breeding nightingale *Luscinia megarhynchos* population, woodland and unimproved neutral grassland. The Core Strategy was subsequently withdrawn in November 2013. The HRA is nevertheless considered to provide a valuable review of impacts on European sites and mitigation measures of relevance to the current iteration of the Local Plan.

Medway has since been working on the new Local Plan covering the period 2012-2035 and undertook an initial Regulation 18 Issues and Options consultation¹⁰ early January 2016 and a further consultation stage on Development Options¹¹ in early 2017. HRA Screening¹² was undertaken on the second Regulation 18 Development Options consultation report, which was published in April 2017. This second iteration of the Local Plan set out a draft vision for Medway's growth. In line with the stage of plan preparation, it did not identify development allocations or draft policies, but rather four scenarios for meeting development needs and policy approaches under broad themes. The four scenarios were:

- maximising the potential of urban regeneration;
- suburban expansion;
- Hoo Peninsula focus; and
- urban regeneration and a rural town.

This section summarises the conclusions of these assessments where relevant to this report taking account of recommendations with respect to the identification and assessment of effects and incorporation of mitigation measures within the Development Strategy.

2.1 Core Strategy 2006-2028 Habitats Regulations Assessment

The results of the HRA (AA) of the Core Strategy are summarised in Table 1. Impacts on European sites that were screened into the AA are highlighted in blue and the text summarises the results of the AA.

⁹ Enfusion, (2011); 'Medway Council Core Strategy Habitats Regulations Assessment Appropriate Assessment) Report December 2011.'

¹⁰ Medway Council, (2016); 'Medway Council Local Plan Issues and Options 2012 – 2035. Consultation Document – January/February 2016.'

¹¹ Medway Council, (2017); 'Medway Council Local Plan 2012-2035 Development Options Regulation 18 Consultation Report January 2017.'

¹² Medway Council, (2017); 'Medway Council Local Plan - Development Options Habitats Regulations Assessment: Screening Report.'

Table 1 Summary of the Results of Medway Publication Draft Core Strategy HRA (AA)

European Sites	Impacts			
	Habitat Fragmentation and Loss	Disturbance	Reduced Water Levels and Quality	Reduced Air Quality
Medway Estuary and Marshes SPA and Ramsar	No adverse impacts on integrity	No adverse impacts on integrity	Potential for adverse impacts on integrity alone and in-combination	Potential for adverse impacts on integrity in-combination
Thames Estuary and Marshes SPA/Ramsar				
The Swale SPA/Ramsar				
North Downs Woodlands SAC				
Peters Pit SAC				
Queendown Warren SAC				

The HRA was unable to conclude with certainty that the Core Strategy would not have adverse effects on the integrity of European sites through reduced air quality (in-combination) and reduced water levels and quality (alone and in-combination) and recommended the incorporation of specific safeguards to strengthen the mitigation proposed within the Core Strategy. The report also concluded that there were no adverse effects on the integrity of European sites due to habitat fragmentation and loss and disturbance due to increased recreational pressure providing that the recommendations within the report are incorporated into the Core Strategy.

2.2 Local Plan 2012-2035 Development Options Regulation 18 Habitat Regulations Assessment Screening

The results of the HRA Screening of the Development Options Regulation 18 Consultation Report published in December 2017 are summarised in Table 2. Impacts and European sites that were screened in are highlighted in blue and the text provides the results of the assessment with respect to likely significant effects.

Table 2 Summary of the Results of Medway Local Plan Development Options HRA Screening Report

European Sites	Impacts			
	Habitat Fragmentation and Loss	Disturbance	Reduced Water Levels and Quality	Reduced Air Quality
Medway Estuary and Marshes SPA and Ramsar	Potential for significant effects alone and in-combination	Potential for significant effects alone and in-combination	No significant effects	Potential for significant effects in-combination
Thames Estuary and Marshes SPA/Ramsar				
The Swale SPA/Ramsar				
North Downs Woodlands SAC				
Peter's Pit SAC				
Queendown Warren SAC		Potential for significant effects alone and in-combination		

As the site allocations and policies were not detailed at this early stage of the Local Plan preparation, it was not possible to carry out an AA of the Development Options and therefore identify any specific adverse impacts. However, the report identifies areas where impacts are uncertain and further work is needed to assess potential sites and draft policies.

Contrary to the conclusions of the AA of the 2011 Core Strategy, the Screening Report did not identify likely significant effects on water levels and quality, given the embedded measures that are in place to address water supply and Medway's ongoing work with providers, as summarised below:

- The assessment of new abstraction licences by the Environment Agency through the Review of Consents process, which could involve the issue of a licence with conditions attached, such as a 'Hands-Off Flow' condition;
- The Environment Agency's duty to assess the effects of consented discharges. It was considered that these ongoing processes; and
- The council is in ongoing liaison with the water companies, to ensure that appropriate provision can be made for infrastructure, and that the emerging growth proposals can be supported.

In addition, likely significant effects due to increased reduced air quality associated with the Local Plan alone were excluded, although further work was required to assess in-combination impacts. Given that policies and site allocations were not defined in the Development Options document, it was not possible to screen out likely significant effects associated with habitat fragmentation and loss within supporting habitats to European sites, as well as disturbance due to increased recreational pressure.

2.3 Summary of Recommendations

This section collates additional policy safeguards and requirements that were set out within the 2011 HRA AA and 2017 HRA Screening report to inform the evolving Local Plan with respect to screened in impact categories.

Habitat loss and fragmentation:

- Appropriate wording within the Green Infrastructure policy ensuring the protection, maintenance and enhancement of supporting habitats to the European sites, preventing development that could lead to the loss or fragmentation of these habitats unless it can be demonstrated that appropriate mitigation is available; and
- Ensuring that any future employment development at the Isle of Grain employment site and the Kingsnorth commercial park should remain within the existing boundaries of the employment areas, unless it can be shown that there will be no loss of European sites or supporting habitats.

Disturbance:

- Appropriate policy wording to ensure that the north Kent marshes Strategy Access Management and Monitoring Strategy¹³ (SAMMS) is implemented to avoid adverse impacts on European sites;
- Requiring any proposal for Lodge Hill to incorporate suitable areas for dog walking; and
- Requiring water taxis to remain within the urban waterfront and not travel further downstream than Lower Upnor.

Reduced water quality and levels:

- Ensuring that development proposals that pose material risk or harm to the quality and/or quantity of ground waters, surface waters, wetlands or coastal water systems either alone or in combination will not be permitted;
- Requiring major proposals for new development to demonstrate that there are, or will be, adequate water supply and waste-water treatment facilities in place to serve the whole development;
- Requiring Sustainable Drainage Systems (SuDS) to be incorporated into all new development;
- Requiring any proposal for Lodge Hill to be accompanied by a surface water strategy that considers the incorporation of SuDS;
- Establish the criteria under which any further growth in the number of houseboats would be allowed;
- Consider making explicit reference to the environmental impacts of proposed growth on the utilities network in the draft infrastructure policy; and
- Provide greater clarity regarding policies for water based tourism, visitor accommodation and recreation proposals to avoid negative impacts on water quality and resources that could affect the integrity of the European sites.

¹³ Liley, D. & Underhill-Day, J., (2013); 'Thames, Medway and Swale Estuaries Strategic Access, Management and Monitoring Strategy.' Unpublished report by Footprint Ecology.

Reduced air quality:

- Supporting the Kent and Medway Air Quality Network during the life of the plan. The network aims to promote the improvement of air quality within the region, help Local Authorities meet their obligations under Environmental Regulations and maintain an accessible database of robust measurements for public reporting, research and development. The network provides monitoring data from the region and publishes monthly and annual reports on their website¹⁴;
- Monitoring of air quality at key locations within or close to the proposed strategic sites;
- Supporting and seeking opportunities for a wider approach to the management of air quality in north Kent in co-operation with surrounding authorities;
- Considering opportunities for the phasing and management of construction to minimise any impact on air quality (especially from vehicular movement);
- Make reference to the Air Quality Planning Guidance in transport policy; and
- Consider the in-combination impacts of reduced air quality associated with the Lower Thames Crossing.

¹⁴ Kent and Medway Air Quality Network, (2018); 'Kent Air.' Available at: <http://www.kentair.org.uk/>

3 Consultation

3.1 Local Plan Development Options Habitats Regulations Assessment Screening

Natural England's consultation response (Appendix A) on the Local Plan Development Options HRA Screening Report was reviewed to ensure that key issues raised at the early stage of the plan development could be addressed in this report.

3.2 The Plan

3.2.1 Stakeholder Workshop

A stakeholder workshop was held on 24th January 2018 with Medway Council, Natural England, Kent Wildlife Trust and the RSPB in attendance. The scope of the HRA was discussed, including European sites, impacts and in-combination projects and plans to be considered in the assessment, addressing points made in Natural England's consultation response. The minutes from the meeting are included in Appendix B.

3.2.2 Further Consultation

Ongoing liaison with Natural England has been important as the assessment has progressed, concerning the overall approach to the HRA at this and future stages of the plan development. This is to ensure that the assessment provides a robust comparative assessment of the options with sufficient detail to inform the selection of the preferred option. Further consideration was also given to the methodology for assessment of air quality impacts.

3.3 Summary of Key Points

The key points raised in the response, at the meeting and during the teleconference are summarised below, as well as the implications for this report:

- It was considered to be premature to screen out any impacts to SACs, SPAs and Ramsar sites at the Development Options stage, as the policies and site allocations were not available. As such, this report provides a full screening assessment in line with Stage 1 of the HRA process;
- The HRA needs to consider the indirect impacts of habitat loss and fragmentation on supporting habitats further than 200m from European sites. Natural England have provided details concerning supporting habitats to inform the assessment;
- With respect to the assessment of disturbance impacts due to increased recreational pressure, further bespoke mitigation may be required beyond the standard tariff contribution to the Strategic Access Management and Monitoring Strategy (SAMMS). Bespoke measures have been recommended for incorporation within the Development Strategy;

- Air quality impacts need to be assessed using site and habitat specific critical loads from the APIS website¹⁵. This information has been considered in the assessment; and
- The air quality in-combination assessment needs to consider local plans rather than the HRAs of those plans, focussing on impact pathways identified in the HRA that could lead to in-combination effects, and the implications of High Court judgement in *Wealden District v Secretary of State*. A high level air quality assessment has been undertaken as part of this interim report to inform the selection of the preferred option, with strategic modelling of in-combination effects to follow during the consultation window prior to issue of the final report.

¹⁵ APIS Air Pollution Information System (2016); Available at: <http://www.apis.ac.uk/src1>.

4 Medway Development Strategy

4.1 Context

The aim of the plan is to ensure that Medway grows sustainably, to provide land for the homes, jobs, infrastructure and services that people need, whilst protecting and enhancing the qualities of the area's environment and heritage. The plan shares the ambitions of the council's regeneration strategy, 'Medway 2035' for a successful waterfront University city noted for its revitalised urban centres, its stunning natural and historic assets, and countryside.

The plan carries forward the draft vision and strategic objectives presented at the Development Options stage, as these received general support through the consultation. It provides further direction on a growth strategy that responds to the vision and strategic objectives set for the plan. It takes a sequential approach to identifying the most sustainable locations for development, identifying sites and broad locations for potential allocations in the plan.

The scale of growth Medway is experiencing is challenging. A key task for the plan is to manage growth to achieve a more successful, attractive Medway with healthier communities that share in the benefits of development. The council works in partnership to secure the natural environmental features of the estuarine landscapes of the north Kent coast, and the natural beauty of the Kent Downs. Coordinated working at a landscape scale is essential to the conservation and enhancement of the natural environment. Medway Council has played a leading role in the establishment of the Strategic Access Management and Monitoring Scheme (SAMMS) that addresses the risk of recreational disturbance on the SPA and Ramsar sites along the Thames, Medway and Swale estuaries.

The plan consultation comprises the third Regulation 18 consultation stage for the Local Plan, further to the Issues and Options consultation in January to February 2016 and the Development Options consultation in January to May 2017. This follows representations made at the Development Options consultation stage requesting that the council explicitly consider a development option that does not include reference to development on land at Lodge Hill, Chattenden.

4.2 Development Scenarios

Four scenarios are set out for the consultation, representing how growth could be delivered in line with the overarching development strategy, which are summarised below. A rural town centred on Hoo St Werburgh is included in all of the development scenarios.

4.2.1 Scenario 1 - Meeting Objectively Assessed Need

The 2015 North Kent Strategic Housing and Economic Needs Assessment identified an objectively assessed need for housing of 29,463 homes over the plan period. This figure is used as the basis for this development scenario.

The strategy seeks to firstly direct growth to brownfield urban sites, to realise the potential of regeneration. This includes identified waterfront regeneration sites, together with 'opportunity areas' in and around town centres with the potential for redevelopment.

This approach complements urban regeneration with the proposed development of a rural town centred on Hoo St Werburgh and some suburban expansion. Over half of growth is directed to urban sites, and the rural town, plus some village expansions could provide about a third of housing land. Development of the rural town in this scenario does not involve development of land on the designated SSSI at Lodge Hill and Deangate, and include buffers to protected land.

4.2.2 Scenario 2 - Investment in Infrastructure to Unlock Growth

This scenario follows the development strategy set out at Scenario 1, but explicitly considers the implications and approach to masterplanning and design that could arise from the introduction of a new passenger rail service and stations. This results in bringing forward development at a faster rate on the Hoo Peninsula, and achieving greater capacity on some sites that are appropriate for higher densities in accessible locations. However, the rural character of the Hoo Peninsula would not support the densities found in more urban areas. The higher and faster rates of delivery that could be supported in this scenario would reduce the need to release some sites in suburban areas, where there are more limited opportunities to mitigate transport impacts. This could remove land in the Capstone Valley and to the north of Rainham from proposed development allocations.

4.2.3 Scenario 3 - Meeting Government's Proposed Calculation of Local Housing Need

This scenario responds to the definition of local housing need by the government's proposed standard method. The annual housing need of 1665 homes has been projected from 2016 to the end of the plan period in 2035, which calculates a need for 37,143 homes. This level of housing need is very challenging, and would require a radical change in how development is delivered. In assessing the options to deliver this level of growth, issues of infrastructure and environmental capacity were identified.

The key components to increasing the supply of housing in this scenario would require a reliance on the development of the urban opportunity areas and achieving high densities on appropriate sites. This could lead to difficulties in achieving the mix and range of housing types needed by Medway's communities. Land in the Capstone Valley and to north and east of Rainham would be considered as potential allocations for development in this scenario. Some employment land is also identified for possible redevelopment to meet housing needs.

There is considerable uncertainty on the ability to demonstrate the deliverability of such rates of growth, together with the infrastructure requirements. The impacts on the transport network would be particularly challenging to mitigate, and exacerbate the problems of poor air quality in the designated Air Quality Management Areas.

4.2.4 Scenario 4 - Consideration of development within Lodge Hill SSSI

The potential inclusion of Lodge Hill as part of Medway's development strategy was subject to the outcome of a Public Inquiry into an outline planning application for the proposed development of a strategic mixed use site, providing for up to 5000 homes. In September 2017, the outline planning application for proposed development at Lodge Hill was withdrawn and the Public Inquiry cancelled. Homes England is preparing a

development proposal for land at Lodge Hill, based on new survey and evaluation work. The new proposal is significantly reduced in scale from the withdrawn outline planning application, reflecting a new strategy for nature conservation on the site. Ecological survey work has informed a new proposal for the site that directs development to the western and southern areas, around Chattenden Barracks and Lodge Hill Camp. All of the ancient woodland and land to the north-east of the site would remain undeveloped to be managed for the long term environmental interests. However the scheme does involve elements of development on land designated as a SSSI.

The emerging proposal seeks to deliver a residential led scheme for up to 2000 homes, as part of a wider strategic development of the wider Hoo rural town. It would also include land for a primary school, over 29 hectares of public open space, some mixed use facilities for community uses, small retail units and commercial land. In meeting the 'Objectively Assessed Need' for housing, development at Lodge Hill could replace the need to release land at Lower Stoke and south of Shawstead Road in the Capstone Valley. With the exception of the sites mentioned above, and the extended potential development area at Lodge Hill, all other components of land supply in this scenario are the same as outlined in Scenario 1.

4.3 Policies

The policies have been prepared in the context of national planning policy and guidance. The council has also had regard to key government strategies and documents in defining the important issues and approaches to be taken in the plan. The Housing White Paper, 2017¹⁶, the Industrial Strategy, 2017¹⁷, and the 25 Year Environment Plan, 2018¹⁸ are highlighted as some of the main strategies that provide direction on significant matters for the plan.

The emerging plan forms part of the council's policy context. It provides the spatial direction for Medway's growth that aligns to the overarching ambitions for the area. The council is committed to achieving Medway's potential as a successful vibrant modern city that celebrates its heritage and close links to the river and countryside, and where all residents can share in opportunities to improve their lives, health and wellbeing. The policies are set out under the following sections:

3. Development Strategy – provides two broad policies concerning sustainable development and the spatial development strategy.
4. Housing - provides for the housing needs of Medway's communities up until 2035. As well as the context for the wider plan, draft policies in this section draw from a Strategic Housing and Economic Needs Assessment as evidence of the diverse housing need in Medway.

¹⁶ Department for Communities and Local Government, (2017); 'Fixing our Broken Housing Market.' Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

¹⁷ HM Government, (2017) 'Industrial Strategy. Building a Britain Fit for the Future.' Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf

¹⁸ HM Government, (2018); 'A Green Future: Our 25 Year Plan to Improve the Environment.' Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

5. Employment - aimed at strengthening the performance of Medway's economy. As well as the context for the wider plan, draft policies in this section draw from an Employment Land Needs Assessment and are closely linked to Medway's regeneration plans for realising the area's economic potential.
6. Retail and Centres - aimed at supporting the viability and vitality of retail and town centres. As well as the context for the wider plan, draft policies in this section draw from a North Kent Retail Study and Medway Retail Needs Assessment as evidence and together form the council's retail strategy.
7. Natural Environment and Green Belt - aimed at recognising the importance of the borough's extensive natural assets. As well as the context for the wider plan, draft policies in this section draw from a Strategic Access Management and Monitoring Strategy (SAMMS) in order to conserve and enhance the natural and local environment.
8. Built Environment - aimed at promoting high quality, sustainable design. The policies consider the housing required to meet Medway's target growth, as well as the historic environment which will provide context to this growth.
9. Health and Communities - aimed at improving the quality of life for Medway's residents, meeting their needs for services and providing the opportunities that support people in living healthy and fulfilling lives. These consider the marked inequalities in health across the area, and the challenges posed by Medway's changing population.
10. Infrastructure - aimed at planning and developing the services and facilities that make up the area's infrastructure. These include strategic infrastructure which has impacts over a region greater than Medway, and which may be of national significance. The council will produce an infrastructure delivery plan to sit alongside the plan.
11. Sustainable Transport - aimed at supporting a sustainable and effective transport network. As well as the context for the wider plan, draft policies in this section draw from the Medway Local Transport Plan and Strategic Transport Assessment to contribute to the overall Development Strategy, critical infrastructure improvements, travel demand measures and other initiatives concerning the development and use of land.
12. Minerals, Waste and Energy - aimed at managing minerals to ensure that there is a steady and adequate supply to meet local needs and contribute to regional requirements.

5 Methodology

The HRA has been carried out in line with the Habitats Regulations Assessment Handbook¹⁹ and, with specific reference to the assessment of plans, the Department for Communities and Local Government (DCLG) publication, ‘Planning for the Protection of European Sites: Appropriate Assessment guidelines’²⁰. It follows the approach set out in the DCLG publication, specifically:

1. Evidence gathering;
2. Task 1 - Likely significant effects or ‘screening’, identifying whether the plan is likely to have a significant effect on European sites; and
3. Task 2 – AA and ascertaining the effect on site integrity.

5.1 Evidence Gathering

5.1.1 European Sites

All European sites within Medway are considered in the HRA, in addition to those within the influence of the plan in terms of possible significant effects through a known impact pathway. As defined in the DCLG publication, the AA should be ‘proportionate to the geographical scope of the option and the nature and extent of any effects identified’²⁰.

An online desk study was undertaken to obtain information on European sites with reference to the following sources:

- Natura 2000 Standard Data Forms and Ramsar Information Sheets were obtained from the Joint Nature Conservation Committee (JNCC) website²¹;
- Citations, conservation objectives for European sites and condition assessments for component SSSIs were sourced from Natural England’s website²²;
- Natural England’s SSSI Impact Risk Zones (IRZs) were reviewed to identify ‘North Kent Marshes Functional Land’²³;
- Existing nitrogen deposition and habitat specific critical loads for European sites were obtained from the APIS website¹⁵;
- The Defra website²⁴ has been referred to for estimated background pollutant concentrations for NO_x and NO₂ for each 1km by 1km OS grid square for years from 2015 to 2030; and

¹⁹ Tyldesley, D. and Chapman C., (2017); ‘The Habitats Regulations Assessment Handbook.’ DTA Publications. Available (with login details) at <https://www.dtapublications.co.uk/handbook/>

²⁰ DCLG, (2006); ‘Planning for the Protection of European Sites: Appropriate Assessment. Guidance For Regional Spatial Strategies and Local Development Documents.’

²¹ JNCC, (2016); ‘UK Protected Sites.’ Available at: <http://jncc.defra.gov.uk/page-4>.

²² GOV.UK, (no date); ‘Planning and Development Protected Sites and Species.’ Available at <https://www.gov.uk/topic/planning-development/protected-sites-species>.

²³ Natural England, (2017); ‘Natural England Open Data. SSSI Impact Risk Zones (England).’ Available at: <http://naturalengland-defra.opendata.arcgis.com/datasets/sssi-impact-risk-zones-england?page=9033>

²⁴ Defra, ‘Local Air Quality Management.’ Available at: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2015> [Accessed March 2018]

- Forecast changes to traffic flows predicted as part of each scenario, which were derived from Medway's Strategic Transport Assessment²⁵.

5.1.1.1 North Kent Marshes Functional Land IRZs

The North Kent Marshes Functional Land IRZ dataset maps risk zones relating to Medway Estuary and Marshes, Thames Estuary and Marshes and The Swale SPA/Ramsar sites. It identifies areas that may be of value to qualifying features of these sites based on aerial photographs, bird survey data available from the Kent and Medway Biological Records Centre and a limited degree of ground truth surveys. It flags certain types of development within two bespoke buffers; the following are flagged within a core buffer, which includes Medway Estuary and Marshes SPA/Ramsar site:

- All planning applications (except householder) outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures;
- Pipelines, pylons and overhead cables. Any transport proposal including road, rail and by water (excluding routine maintenance). Airports, helipads and other aviation proposals.
- Solar schemes with footprint > 0.5ha, all wind turbines;
- Planning applications for quarries, including new proposals, Review of Minerals Permissions (ROMP), extensions, variations to conditions etc., oil and gas exploration/extraction;
- Large non-residential developments outside existing settlements/urban areas where net additional gross internal floorspace is > 1,000m² or footprint exceeds 0.2ha;
- Residential development of 10 units or more;
- Any residential development of 10 or more houses outside existing settlements/urban areas; and
- Landfill including inert, non-hazardous and hazardous landfill.

The following types of development are flagged within a smaller, peripheral buffer the beyond the boundaries of the European sites:

- Pylons and overhead cables, airports, helipads and other aviation proposals;
- Wind turbines;
- Large non-residential developments outside existing settlements/urban areas where footprint exceeds 1ha;
- Residential development of 50 units or more;
- Any residential development of 10 or more houses outside existing settlements/urban areas; and
- Landfill including inert, non-hazardous and hazardous landfill.

²⁵ Fore Consulting Limited, (2018); 'Medway Council. Medway Local Plan. Strategic Transport Assessment: Development Options Technical Report 2. 1 March 2018. Version 0.2. Draft – For Internal Use Only.'

5.1.1.2 Air Quality Data

The habitat specific critical loads are set as ranges, reflecting the uncertainty in the present scientific knowledge and evidence-base on the effects of air pollution on sensitive species. If the upper limit critical load (CLmax) is exceeded, it is likely that there is harm to the relevant habitat/features arising from the current level of nitrogen deposition. If the deposition level is below the lower limit critical load (CLmin), it is unlikely that the feature/habitat is being harmed. If the deposition level lies between the lower and upper critical load values, it is not possible to be certain that harmful effects are, or are not, occurring.

The background deposition rates are an average of 2013 – 2015 data. Background deposition rates for future assessment years have been assumed to reduce by 2% per year in line with guidance outlined in the Design Manual for Roads and Bridges (DMRB).

5.1.1.3 Traffic Data

Traffic data, provided by Fore Consulting, comprised 24hr Annual Average Daily traffic (AADT) flows, percentage of the fleet which are Heavy Duty Vehicles (HDVs) and average speed (kph). This data was provided for the following years and scenarios:

- Baseline 2016;
- Reference Case 2023;
- Scenarios 1, 2, 3 and 4 2023;
- Reference Case 2028;
- Scenarios 1, 2, 3 and 4 2028;
- Reference Case 2035; and
- Scenarios 1, 2, 3, 4 2035.

For each of the future assessment years, a reference case was provided which is representative of traffic flows without any of the plan scenarios in place. The future reference and scenario cases account for predicted national traffic growth and local committed development which sits outside of the plan. This relates to committed developments and highway improvements in the relevant year, plus an allowance for growth associated with planned future development throughout the rest of the country through the use of NTEM (National Trip End Model) growth factors²⁶. The NTEM projections effectively take into account Local Plan and other development growth in other authorities, although at an aggregated level. As a result, it is considered that in-combination effects are included as part of this assessment.

The modelling has assessed a scenario in which the plan development goes ahead without any mitigation and the effects of plan policies, public transport improvements or physical highway improvements have not been considered. This therefore represents a worst-case scenario in terms of traffic emissions.

5.1.2 In-combination Plans and Projects

In-combination plans and projects have been selected on a case-by-case basis, focussing on the relevant stages of other plans and projects that could interact with identified effects

²⁶ Data.gov.uk. National Trip End Model (NTEM). Available at: <https://data.gov.uk/dataset/national-trip-end-model-ntem>.

of the plan. Projects have only been considered where they are not covered by the relevant local plan, or where additional information has been made available since the plan was adopted.

5.2 Task 1: Screening

This assessment considers whether there are any likely significant effects of the plan on European sites, either alone or in combination with other plans and projects. Every element of the plan has been analysed and screened for likely significant effects.

Consideration has been given to whether any effects of the plan either alone or in combination with other plans or projects undermine the conservation objectives for a European site. Such effects are deemed significant and are screened in, thereby triggering the requirement for AA.

The screening stage is a preliminary examination. If significant effects cannot be ruled out without extensive investigation, the plan is considered to have a likely significant effect and requires further investigation through an AA.

Effects of the plan have been identified through a review of the plan in light of the sensitivities of the European sites, particularly the qualifying features and pressures and threats.

5.2.1 Screening Criteria

The draft site allocations and policies supplied by Medway Council have been screened in accordance with the criteria set out in Table 3.

Table 3 Screening Criteria

Screening Category	Criteria	Screening Outcome
A	General statement of policy / general aspiration	Screened out
B	Policy listing general criteria for testing the acceptability / sustainability of proposals	Screened out
C	Proposal referred to but not proposed by the plan	Screened out
D	Environmental protection / site safeguarding policy	Screened out
E	Policies or proposals which steer change in such a way as to protect European sites from adverse effects	Screened out
F	Policy that cannot lead to development or other change	Screened out
G	Policy or proposal that could not have any conceivable effect on a site	Screened out
H	Policy or proposal 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)	Screened out

I	Policy or proposal with a likely significant effect on a site alone	Screened in
J	Policy or proposal with an effect on a site but not likely to be significant alone, so need to check for likely significant effects in combination	Check categories K and L
K	Policy or proposal not likely to have a significant effect either alone or in combination	Screened out after the in-combination test
L	Policy or proposal likely to have a significant effect in combination	Screened in after the in-combination test

The in-combination assessment only applied to elements of the plan that give rise to effects which are not likely to be significant, as per category J in Table 3.

The screening assessment has taken into account plainly established uncontroversial mitigation measures. These are measures that are in place irrespective of the plan; they should be simple to apply and without complex implications that should be tested through AA.

5.3 Task 2: Appropriate Assessment

The purpose of the AA is to undertake an objective scientific assessment of the implications for the European sites' qualifying features potentially affected by the plan in light of their conservation objectives. It is a transparent and iterative process, which is fully documented in this report. It provides the information necessary for Medway Council to assess whether the plan has an adverse effect on the integrity of European sites, which is referred to as the 'integrity test'.

5.3.1 Scope

Where significant effects have been identified during screening or the significance of effects are uncertain, further consideration has been given to the potential for these effects to be of a sufficient scale and magnitude to hinder the features of the European sites from meeting their conservation objectives. This stage in the process also takes account of mitigation measures.

5.3.2 High Level Air Quality Assessment

An assessment was undertaken of the potential changes in nitrogen deposition and NO_x concentrations arising from forecast changes to traffic flows predicted as part of each scenario. The traffic data was screened against criterion set out in the Environmental Protection UK (EPUK)/Institute of Air Quality Management (IAQM) land-use planning guidance²⁷ for which a quantitative air quality assessment may be required. The criterion used in this assessment are set out below:

- A change of Light Duty Vehicle (LDV) flows of more than 500 AADT; or
- A change of HDV flows more than 100 AADT.

²⁷ Moorcroft and Barrowcliffe et al (2017) Land-use Planning & Development Control: Planning for Air Quality v1.2, Institute of Air Quality Management

Those scenarios which result in the greatest increase in traffic at roads adjacent to each of the designated sites have been included in this assessment.

Vehicle emissions for those roads which have the greatest increase in traffic flows within 200m of the designated sites have been calculated using the Defra Emission Factor toolkit (EFT) v8.0.1²⁸. The EFT provides vehicle emission data for all years up to 2030. For the future assessment year of 2035, vehicle emissions have been held constant from 2030.

To determine indicative pollutant concentrations at the closest point of the European sites to these roads, the dispersion equation from the DMRB spreadsheet method has been used. This allows roadside contributions to NO_x pollutant concentrations to be calculated.

To allow a comparison with the Annual mean NO_x standard, which has been set for the protection of vegetation, background concentrations of NO_x have been added to the roadside contributions calculated using the DMRB method.

5.3.2.1 NO_x to NO₂ Conversion

For the assessment of road emissions, Defra's LAQM.TG16²⁹ details an approach for calculating the conversion of roadside NO_x to NO₂, which takes into account the difference between ambient NO_x concentrations with and without the change in traffic, the concentration of ozone and the different proportions of primary NO₂ emissions in different years. This approach is available as a spreadsheet calculator. The latest version 6.1 released in October 2017, has been used.

5.3.2.2 Nutrient Nitrogen Deposition

The dry deposition flux for each receptor location has been calculated using the recommended deposition velocity in Table 4. The deposition velocity for 'Forest' has been used in this assessment for North Downs Woodland SAC, all other designated sites are considered to be grassland which is representative of shorter vegetation.

Table 4 Recommended Dry Deposition Velocities

Pollutant	Recommended Deposition Velocity (m/s)		European Sites
NO ₂	Grassland	0.0015	Medway and Thames Estuary and Marshes SPA/Ramsar sites Peter's Pit SAC
	Forest	0.003	North Downs Woodland SAC

The conversion factor used to convert dry deposition flux from units of µg/m²/s to kg N/ha/yr is 96. Detailed habitat information for the receptor locations chosen is not available. Therefore, to account for all critical loads and assess a worst case scenario, the minimum lower critical load and maximum upper critical load of any of the habitats designated as part of each site have been used.

²⁸ Defra, Emission factor Toolkit, <https://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html> [Accessed March 2018]

²⁹ Defra, Local Air Quality Management Technical Guidance, April 2016

5.3.2.3 Significance Criteria

The impact of the change in road traffic can be referred to as the Process Contribution (PC) to concentrations and deposition rate. The combination of PC deposition rate and the background deposition rate is referred to as the Predicted Environmental Deposition Rate (PEDR).

The Defra/Environment Agency test on significance has been used, whereby if the long-term PC is less than 1% of the critical load for protected conservation areas, there are no likely significant effects. Where the long-term PC is greater than 1% of the critical load and the critical load is exceeded, there are likely significant effects that require further consideration as part of an AA.

5.3.2.4 Assumptions and Limitations

As this is a high-level assessment, a number of assumptions have been made in line with best practice guidance and include:

- Vehicle emissions for future assessment years as included in the Defra Emission Factor Toolkit, which account for improvements in vehicle emissions and technology in the future;
- Background concentrations of NO_x and NO₂ have been assumed to decrease with time as shown in the Defra background pollutant mapping;
- Existing nitrogen deposition rates have been assumed to reduce by 2% per year for future assessment years, as recommended by the Design manual for Roads and Bridges; and
- The scenario resulting in the greatest increase in traffic across the assessment years has been used to assess potential air quality impacts at each designated site.

As a full modelling assessment has not been carried out at this stage, no verification of predicted indicative pollutant concentrations has been undertaken. The level of assessment is appropriate to the stage of the plan, with further work planned to support the selection of the preferred option, with a full air quality assessment, using dispersion modelling planned at the Regulation 19 consultation stage.

5.3.3 Assessment of Effects in Relation to Conservation Objectives

The assessment of effects on European sites in relation to their conservation objectives has taken into account the following factors:

- The implications for each qualifying feature of the European sites affected;
- The conservation status of the qualifying features of the sites;
- Implications for the site condition of SSSI units of SPAs; and
- Threats, degradations or disturbance of the qualifying features.

5.3.4 Mitigation Measures

Consideration has been given to the implementation of amendments to the plan to avoid significant effects, or lessen effects to the extent that they do not constitute adverse

effects. This may comprise changes to site allocation boundaries; the removal of allocations; alterations to policy wording; or the removal or addition of policies.

Effects of the plan are reassessed following the implementation of mitigation measures using the same methodology. This process may be repeated several times to provide confidence in an assessment of no adverse effects.

5.3.5 Integrity Test

The report considers whether the plan has an adverse effect on the integrity of European sites, to inform the 'integrity test'. Integrity is described as:

“The site’s coherence, 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 species for which it was classified”³⁰.

Integrity also relates to a site’s resilience and ability to evolve in ways that are favourable to conservation.

5.3.6 The Use of Professional Judgement

Professional judgement has been used in the interpretation of results in relation to assessment of effects, the significance of effects and consequences for the conservation objectives of European sites. A precautionary assessment has been applied in line with current guidance, whereby an effect is deemed significant if the effect cannot be ruled out on the basis of objective information.

³⁰ Office for the Deputy Prime Minister (ODPM), (2009); ‘Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.’

6 HRA Screening of the Development Strategy

The plan is not directly connected with or necessary to the management of the European site(s) potentially affected and is therefore not exempt from the requirements of HRA.

This section documents the results of stage 1 of the HRA process. European sites and impact types within the scope of the assessment are reviewed. The assessment then considers likely significant effects of the plan on European sites, both alone and in combination with other plans and projects.

6.1 European Sites

The following sites are assessed as they are located within Medway:

- Medway Estuary & Marshes SPA/Ramsar;
- Thames Estuary & Marshes SPA/Ramsar; and
- North Downs Woodlands SAC.

The following European sites are located entirely outside the plan area, but are within the influence of the plan in terms of possible impacts and have therefore been included:

- Peter's Pit SAC;
- Queendown Warren SAC; and
- The Swale SPA/Ramsar.

These sites are described in the following sections. Full details concerning site areas, qualifying features, conservation objectives, condition assessments, pressures/threats and critical loads are provided in Appendix C. Appendix C also provides a map showing the location of the European sites in relation to the Medway unitary authority boundary.

6.1.1 Medway Estuary and Marshes SPA and Ramsar

The Medway Estuary forms a single tidal system with the Swale and feeds into the outer Thames Estuary. It is a complex of rain-fed, brackish, floodplain grazing marsh with ditches, and intertidal saltmarsh and mudflat. The saltmarsh and grazing marsh are of international importance for their diverse assemblages of wetland plants, including beds of *Enteromorpha* and some eelgrass *Zostera* spp., as well as invertebrates of which at least twelve British Red Data Book wetland species have been recorded. The complex and diverse mixes of coastal habitats support internationally 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 waders.

6.1.2 Thames Estuary and Marshes SPA and Ramsar

The Thames Estuary and Marshes is a wetland of European importance comprising a mosaic of intertidal habitats, saltmarsh, coastal grazing marshes, saline lagoons and chalk

pits. The site provides wintering and breeding habitats for important assemblages of wetland bird species, particularly wildfowl and waders, as well as supporting migratory birds on passage. The site forms part of the wider Thames Estuary, together with other classified SPAs in both Essex and Kent.

6.1.3 North Downs Woodlands SAC

The area is considered to be one of the best in the UK for calcareous substrates (Festuco-Brometalia), supporting semi-natural dry grasslands and scrubland facies. The area is also considered to be one of the best in the UK for Asperulo-Fagetum beech forests and yew *Taxus baccata* woodland.

6.1.4 Peter's Pit SAC

Peter's Pit is an old chalk quarry situated in the North Downs in north Kent, with large ponds situated amongst grassland, scrub and woodland. Great crested newt *Triturus cristatus* populations thrive amongst these ponds, which have widely fluctuating water levels.

6.1.5 Queendown Warren SAC

The area is considered to be one of the best in the UK for calcareous substrates (Festuco-Brometalia), supporting semi-natural dry grasslands and scrubland facies. A number of rare and scarce plant species have been recorded on the site, including early spider-orchid *Orphrys sphegodes*, burnt orchid *Orchis ustulata* and man orchid *Aceras anthropophorum*.

6.1.6 The Swale SPA/Ramsar

Located between the Isle of Sheppey and the Kent mainland, the Swale is a complex of brackish and freshwater, floodplain grazing marsh with ditches, and intertidal saltmarsh and mudflat. These habitats together support internationally important numbers of wintering waterfowl. Rare wetland birds breed in important numbers. The saltmarsh and grazing marsh are of international importance for their diverse assemblages of wetland plants and invertebrates.

6.2 Pathways of Impact

Implementation of the plan as summarised in Section 3 could lead to a range of effects on the European sites that have been scoped into the assessment, as summarised in Table 5. This table also details the range of impact types that are considered with respect to each effect. Consideration has been given to pathways along which development can be connected with European sites, rather than arbitrary boundaries or distances from European sites.

Table 5: Summary of Potential Impacts within the Scope of the HRA

Effects on European Sites	Impact Types
Habitat (& species) fragmentation and loss	Direct land take, removal of green/ connecting corridors/ supporting habitat, changes to sediment patterns (rivers and coastal locations) Coastal restrictions Introduction of invasive species (predation) Disturbance
Disturbance	Increased recreational activity (population increase) Noise and light pollution (from development and increased traffic)
Changes to hydrological regime/water levels	Changes to surface water flow pathways - increased hard standing non-permeable surfaces or accelerated run-off and interruption of ground water flows
Changes to water quality	Increase in run-off or pollutants from non-permeable surfaces (roads, built areas) Potential pollution from water emissions, spills and surface run-off Increased volume of discharges (consented)
Reduced air quality	Increased traffic movements resulting in increased air pollution (traffic, housing) Potential emissions from buildings (employment and housing)

6.2.1 Habitat Fragmentation and Loss

There is potential for the plan to result in direct land take within European sites, and to a greater extent, the loss of habitat outside European sites that supports qualifying features of the European sites. Supporting habitat may be located some distance from the European sites, particularly with respect to the north Kent marshes that are designated for bird species that utilise a wide range of habitats beyond the core habitats formally designated as SPA/Ramsar sites. This is a key consideration for these sites. Associated with this loss is the fragmentation of habitats, through the loss of connecting corridors that hinders the movement of qualifying species. The North Kent Functional Land IRZs provides a valuable reference for identifying areas that may provide supporting habitat for the SPA/Ramsar sites. Project-level survey and assessment work would be required to establish the importance of these areas for European sites.

As sea levels rise, the north Kent marshes are subject to ‘coastal squeeze’ where coastal defences prevent intertidal habitats from migrating landwards and are therefore subsumed by the rising seas. Other documents provide an overarching strategy for the management of coastal defences in Medway (refer to Section 6.4), meaning that effects associated with coastal squeeze are most likely to act in-combination with the plan. The provision of residential development would be expected to increase dog and cat populations, potentially increasing predation within European sites.

6.2.2 Disturbance

Development proposed in the plan is expected to increase recreational pressure and therefore disturbance within and around European sites, particularly the north Kent marshes given their proximity to existing urban centres. Development adjacent or close to European sites also has a potential to cause disturbance to qualifying species due to

lighting and noise during construction and operation. The scale, type and location of development in relation to European sites and the sensitivity of nearby and adjacent habitats will influence the significance of such effects.

6.2.3 Reduced Water Quality and Levels

Development immediately adjacent to European sites has the potential to affect both the water quality and levels within those sites which may give rise to significant effects on their features or supporting habitats for features. These impacts could take the form of pollution or contamination of habitats, especially in areas where either surface water or other water based emissions (eg. from industrial processes in employment areas) are discharged into water courses or ground water. Developments also have the potential to affect water quantity either through localised lowering of the water table through excavations or through interrupting drainage pathways.

The significance of any effects on either water quality or quantity and any resulting effects would be influenced by the nature of any development proposed, the management of pollution risk during construction and the management of surface water including discharge points.

6.2.4 Reduced Air Quality

Roads within 200m of a designated site have the potential to contribute towards nitrogen deposition rates within European sites. Pollutant concentrations drop off rapidly from the road and beyond 200m any impact is considered negligible³¹. Therefore, all main roads, for which traffic data is available, within 200m of the European sites have been screened to determine the changes in traffic for each scenario and resulting changes to deposition rates. Nitrogen oxides (NOx) may lead to ground flora changes related to eutrophication.

The only other potential sources of pollution associated with the plan would be the energy strategy for the buildings, if combustion plant was proposed as part of the energy strategy i.e. a district heating network or centralised energy centre, and emissions from employment areas, such as energy from waste. No information regarding the energy strategy for future development is available yet, however this would need to be considered as part of air quality assessments undertaken for the planning process for individual developments, where relevant.

With respect to the intertidal habitats, effects of nitrogen deposition are mainly on growth, photosynthesis and nitrogen assimilation/metabolism. Direct damage to mosses, liverworts and lichens, which receive their nutrients from atmospheric deposition, often leads to reductions in species diversity, but also leads to an increase in nitrogen-loving species. In open water habitats, this can lead to changes in species composition of macrophyte communities and increased algal productivity. Woodland habitats are particularly vulnerable to impacts associated with nitrogen deposition, particularly in the understorey, including loss of species diversity, loss of sensitive forbs, mosses and lichens and acidification (decreased soil pH).

Critical loads have been published for many habitats which set ranges, reflecting the uncertainty in the present scientific knowledge and evidence-base on the effects of air pollution on sensitive species. If the upper limit critical load (CLmax) is exceeded, it is likely that there is harm to the relevant habitat/features arising from the current level of

³¹ Highways Agency (2007) Design Manual for Roads and Bridges: Volume 11, Section 3, Part 1.

nitrogen deposition. If the deposition level is below the lower limit critical load (CLmin), it is unlikely that the feature/habitat is being harmed. If the deposition level lies between the lower and upper critical load values, it is not possible to be certain that harmful effects are, or are not, occurring.

The relevant critical loads for this study have been derived from the most up-to-date information on the APIS website³² and are shown in Table 6.

Table 6 Nutrient Nitrogen Critical Loads (kg N/ha/yr)

Designated Site	Critical Load Class	Nitrogen Critical Loads CLmin-CLmax (kg N/ha/yr)
Medway Estuary and Marshes SPA/Ramsar	Supralittoral sediment - Coastal stable dune grasslands (acidic)	8 – 10
	Supralittoral sediment - Coastal stable dune grasslands (calcareous)	10 – 15
	Supralittoral sediment - shifting coastal dunes	10 – 20
	Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 - 10
	Dwarf shrub heath (Northern wet heath)	10 - 20
	Fen, marsh and swamp (Rich Fens)	15 - 30
	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 - 30
Thames Estuary and Marshes SPA/Ramsar	Supralittoral sediment (Coastal stable due grasslands acidic)	8 – 10
	Supralittoral sediment (shifting coastal dune)	10 - 20
	Supralittoral sediment (Coastal stable dune grasslands calcareous)	10 - 15
	Dwarf shrub heath (Northern wet heath)	10 - 20
	Fen, marsh and swamp (Rich Fens)	15 - 30

³² Air Pollution Information System, <http://www.apis.ac.uk/> [Accessed March 2018]

Designated Site	Critical Load Class	Nitrogen Critical Loads CLmin-CLmax (kg N/ha/yr)
	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 - 30
North Downs Woodland SAC	Coniferous Woodland	5 – 15
	Fagus (beech) Woodland	10 – 20
	Sub-atlantic semi-dry calcareous grassland	15 - 25
Peter's Pit SAC	Permanent dystrophic lakes, ponds and pools	3 - 10

6.3 Effects of the Plan Alone

6.3.1 Policies

Table 7 identifies the policies that have been screened into the AA due to the potential for significant effects alone, in line with the criteria set out in Table 3. Full policy screening, including all screened out policies, is provided in Appendix D.

Table 7 Screened in Policies with Likely Significant Effects Alone

Policy	Rationale
Policy DS2: Spatial Development Strategy	Site allocations at Hoo St Werburgh associated with the proposed rural town and at Lower Rainham, High Halstow, Allhallows, Grain and Lower Stoke have potential to provide supporting habitat to the north Kent marshes European sites. There are likely significant effects associated with development in these locations, associated with habitat loss and fragmentation, disturbance, reduced water quality and levels and reduced air quality. Extension of a riverside walk also has a potential to increase recreational pressure within the SPA/Ramsar sites depending on its location.
Policy H1: Housing Delivery	Delivering housing targets in line with the objectively assessed need for housing has a potential to lead to significant effects on European sites associated with disturbance, habitat loss, reduced water quality and levels and reduced air quality. In particular, site allocations on the Hoo Peninsula associated with the proposed rural town have potential to provide supporting habitat to the north Kent marshes European sites.
Policy H7: Houseboats	Houseboats are located within SPA/Ramsar sites, the growth of which could increase disturbance or water pollution through waste disposal. This policy indicates that further growth may be permitted, but does not provide the criteria under which the growth of houseboats will be allowed. It is therefore not possible to rule out likely significant effects on European sites.
Policy H10: Gypsy, Traveller and Travelling Showpersons	The policy prohibits proposals for new sites within European sites, but does not take supporting habitat into account, or development that could cause disturbance or other indirect impacts. As such, it is not possible to rule out likely significant effects.

Policy	Rationale
Policy E1: Economic Development	The policy makes provision for the supply of 369,954 m2 of employment floorspace to be delivered up to 2035 identified in the Employment Land Needs Assessment. The strategic site at Kingsnorth is located partially within and adjacent to Medway Estuary & Marshes SPA and Ramsar site and includes an additional parcel of land that was not allocated in the 2003 Local Plan (Land north of Kingsnorth Industrial Estate). The site at Grain is located adjacent to Medway Estuary & Marshes SPA and Ramsar site and close to Thames Estuary & Marshes SPA and Ramsar site, although the boundaries of this allocation align with the 2003 Local Plan. Given the extent and location of employment provision, there are likely significant effects associated with the loss of designated and supporting habitats, disturbance associated with lighting, noise and recreation and reduced water quality and levels.
Policy RTC2: Sequential Assessment	It is not possible to rule out likely significant effects on European sites for main town centre uses on the edge of or out of centre, given that the locations are not defined and environmental impacts have not been taken into account.
Policy RP3 ³³ : Impact Assessments	It is not possible to rule out likely significant effects on European sites for main town centre uses on the edge of or out of centre, given that the locations are not defined and environmental impacts have not been taken into account.
Policy NE5: Securing strong Green Infrastructure	The policy promotes improvements to the public rights of way network, including the extension of appropriate access along the riverside, which has a potential to increase recreational disturbance within the SPA/Ramsar sites.
Policy T3: Hoo Peninsula rail connection	Site allocations on the Hoo Peninsula associated with the proposed rural town have potential to provide supporting habitat to north Kent marshes European sites. There are likely significant effects associated with encouraging development on the Hoo Peninsula and provision of new rail infrastructure, including habitat loss, disturbance, reduced air quality and reduced water quality and levels.
Policy T5: Riverside Infrastructure	There are likely significant effects on European sites associated with the potential introduction of visitor and river taxi services and provision of new riverside infrastructure facilities. Such effects could include habitat loss and fragmentation, disturbance and changes to water levels and quality.
Policy MWE2: Land- won extraction of sands and gravels	The areas of search for the land-won extraction of sands and gravels are adjacent or close to European sites. The area at Hoo St Werburgh is located adjacent to Medway Estuary & Marshes SPA/Ramsar and the 250m consultation areas fall within this European site. At Grain and Allhallows, the areas are close to Thames Estuary & Marshes SPA/Ramsar site. The policy does not provide mitigation for adverse environmental effects. As such, there are likely significant effects on European sites associated with habitat loss and fragmentation, disturbance, reduced water quality and air quality.
Policy MWE3: Land- won minerals: chalk and clay	It is not possible to rule out likely significant effects associated with the extraction of land-won minerals outside of the identified areas, given that these areas are not specified and the policy makes an allowance for such activities despite adverse environmental impacts. Significant effects could include habitat loss, disturbance and reduced water and air quality.
Policy MWE7: New Waste Management Facilities	The policy provides criteria for testing the acceptability of the development of waste facilities outside of identified industrial areas, including adequate mitigation for impacts on European sites. However, the development of waste management that utilises the River Medway as a means of transportation has a potential to lead to increased boat

³³ Since updated to Policy RTC3 in the current Development Strategy document online

Policy	Rationale
	traffic and therefore significant effects on European sites, including through disturbance and reduced water and air quality.
Policy MWE9: Waste disposal to land	There are likely significant effects on European sites associated with the provision of a disposal facility for non-inert or hazardous waste within the areas referred to as the Disposal to Land Resource Areas on the Hoo Peninsula and Isle of Grain. The policy does not include criteria relating to mitigating or avoiding environmental impacts and, while these areas are located outside European sites, these Disposal to Land resource areas have potential to provide supporting habitats to north Kent marshes European sites. There are likely significant effects associated with habitat loss, disturbance and reduced water and air quality.

6.3.2 Site Allocations

This section reviews site allocations that have been screened into the AA due to the potential for significant effects alone. Full site allocations screening, including screening of all site allocations, is provided in Appendix D.

6.3.2.1 Medway and Thames Estuary and Marshes SPA/Ramsar Site

Outdoor sports and recreational activities are cited as current pressures/threats to Medway and Thames Estuary and Marshes SPA/Ramsar sites. The majority of Medway Estuary and Marshes SPA/Ramsar site is in unfavourable condition (99.53%) and the remaining areas destroyed. Natural England's site condition assessment states that wintering and breeding bird numbers have declined significantly at this site for reasons which are not clear. Drawing from previous condition assessments, habitat quality is thought to be good and not the cause of declines. As it is currently unclear as to why bird declines are occurring, a number of reasons are being investigated including disturbance, bird movements within the region and internationally. Further consideration on condition will be given when the results of current research are available; in the meantime the site remains recovering but at risk.

Studies have been undertaken to assess the impact of recreational disturbance to wintering waterfowl on the intertidal habitats and understand the factors influencing recreational activity, which have found that³⁴:

- There have been marked declines in some of the bird species, particularly around Medway. Within Medway, the areas that have seen the most marked declines are the area north of Gillingham, including the area around Riverside Country Park, which is one of the busiest areas in terms of recreational pressure;
- Recreational activities cause disturbance to birds, mostly due to the presence of dogs, particularly those off the lead. In one study, dog walking accounted for 55% of all major flight observations with a further 15% attributed to walkers without dogs³⁴. Other activities that contribute towards disturbance are those that involve people on the mudflats or the water;
- Visitor rates decline with distance from the SPA/Ramsar sites and indicate that development within a 6km radius of access points is particularly likely to result in

³⁴ Liley, D. & Fearnley, H. (2011); 'Bird Disturbance Study, North Kent 2010/11.' Footprint Ecology.

increased access levels and activities that relate to day-to-day use of local greenspace;
and

- Beyond 6km, large developments or large scale changes to housing levels will also result in increased recreational use. Visitors to the North Kent coast mostly originate from a zone north of the M2/A2 between Gravesend and Herne, with those visiting from beyond 6km being likely to visit for more coastal specific activities, including boating and bait digging.

The majority of the housing allocations are located within 6km of Medway and Thames Estuary and Marshes SPA/Ramsar sites, meaning that there are likely significant effects associated with increased recreational pressure and therefore disturbance within these sites. Some of these sites at Lower Rainham, Gillingham, Chatham, Chattenden, Hoo St Werburgh, High Halstow, Lower and Middle Stoke, Allhallows and Grain also fall within the North Kent Marshes Functional Land IRZ, meaning that there is a risk of loss to supporting habitats. Allocations in Gillingham (Steelfields on Danes Hill, Ref. 1109 and National Grid Property on Pier Road, Ref. 0.687) are located adjacent or near to Medway Estuary and Marshes SPA/Ramsar respectively, meaning that there is a risk of disturbance due to noise and lighting.

At the previous Regulation 18 Development Options consultation, consideration was given to the potential development of a site at Mill Hill for a new stadium for Gillingham Football Club, with some supporting mixed development. This proposal is not promoted in the Development Strategy consultation document. However, given the potential impact that could arise from such a development, the HRA has considered such a proposal, to provide a basis for further work, should the site be promoted in the representations to the Development Strategy consultation. In this regard, the proposal of a site at Mill Hill for a new stadium for Gillingham Football Club falls within North Kent Marshes Functional Land IRZ and therefore would have potential to provide supporting habitat to European sites. This site is also located approximately 415m to the southwest of Medway Estuary and Marshes SPA and Ramsar site. As such, there would be likely significant effects associated with habitat loss, fragmentation and disturbance.

As highlighted in Table 7 with respect to policy E1, the strategic employment site allocations at Kingsnorth and Grain are located within and adjacent to Medway Estuary and Marshes SPA/Ramsar site and the allocation at Grain is close to Thames Estuary and Marshes SPA/Ramsar site. There are therefore likely significant effects associated with the loss of designated and supporting habitats, disturbance associated with lighting, noise and recreation and reduced water quality and levels. The majority of other employment sites are some distance from European sites and are therefore unlikely to lead to significant effects, with the exception of a site at Hoo St Werburgh, which is located within the North Kent Marshes Functional Land IRZ and therefore may provide supporting habitat to European sites.

The primary and secondary schools at Hoo St Werburgh are located within the North Kent Marshes Functional Land IRZ and therefore could provide supporting habitats to these sites.

6.3.2.2 The Swale SPA/Ramsar

There are no site allocations within 6km of The Swale SPA/Ramsar, meaning that there are no likely significant effects associated with reduced water quality or disturbance as a result of the plan. The Swale SPA/Ramsar is not recognised as being sensitive to impacts associated with air pollution. Considering that this site is located approximately 6.8km

from Medway's boundary, there are no likely significant effects associated with reduced air quality.

However, as discussed in section 6.3.2.1, there are housing, employment and school site allocations that fall within the North Kent Marshes Functional Land IRZ which may provide supporting habitat to this site. As such, habitat loss and fragmentation is considered further in the AA.

6.3.2.3 North Downs Woodlands SAC

There are no site allocations within or near to the SAC; the closest are small employment sites approximately 2.95km to the northwest of the eastern portion of the SAC at Walderslade. The nearest housing allocation is approximately 3.65km to the north. Furthermore no supporting habitat to the SAC has been identified. There are therefore no likely significant effects associated with habitat loss and fragmentation. The likelihood of effects associated with reduced water quality and levels as a result of the plan is therefore relatively low and if effects did occur they are unlikely to be significant. As such, impacts on water quality and levels at this site are not considered further.

Recreational activities are a recognised pressure/threat to North Downs Woodlands SAC. This SAC is composed of parts of two SSSIs: Halling to Trottiscliffe Escarpment SSSI, which falls partly within Medway; and Wouldham to Detling Escarpment SSSI to the east, which falls within Maidstone and Tonbridge and Malling. The condition assessment records evidence of access by four-wheel-drive vehicles and small fires along the northern boundary of the woodland within part of Halling to Trottiscliffe Escarpment SSSI. However, the majority of the site is in favourable condition, with units assessed as unfavourable condition due to scrub encroaching into chalk grassland, excessive grazing and conifer plantations. There are other areas of woodland nearby, including the adjacent areas of SSSI and other areas closer to urban areas within Medway. Given that there are no site allocations near to the SAC, there are alternative woodlands close by that provide opportunities for woodland recreation and disturbance is not currently a factor with respect to the condition of SSSI units, it is possible to rule out likely significant effects on North Downs Woodlands SAC due to disturbance.

Air pollution and air borne pollutants are a recognised pressures/threats to North Downs Woodlands and there are roads within 200m of this site that have the potential to contribute towards nitrogen deposition rates within the European site. Likely significant effects associated with reduced air quality are therefore considered in the AA.

6.3.2.4 Peter's Pit SAC

There are no site allocations in the vicinity of Peter's Pit SAC and no supporting habitat has been identified. As such, there are considered to be no likely significant effects associated with habitat loss and fragmentation or reduced water quality and levels. Recreational disturbance is not considered to be a threat to this SAC and the site is in favourable condition. Great crested newts, which are the qualifying feature for this site, are not likely to be disturbed by any minimal increase in visitors associated with site allocations in the plan, therefore there are no likely significant effects.

Peter's Pit SAC is not recognised as being sensitive to impacts associated with air pollution. However, there are roads within 200m that have the potential to contribute towards nitrogen deposition rates within the European site. Likely significant effects associated with reduced air quality are therefore considered in the AA.

6.3.2.5 Queendown Warren SAC

This SAC is located outside Medway; there are no site allocations in the vicinity of Queendown Warren SAC and no supporting habitat to the SAC has been identified, as such no effects have been identified relating to habitat loss and fragmentation or reduced water quality and levels. There are also no roads included in Medway's Strategic Transport Assessment within 200m of Queendown Warren SAC, therefore there are no likely significant effects associated with reduced air quality.

The nearest residential site allocation is approximately 1.75km to the north in Rainham, with further allocations located approximately 5km to the northwest in Capstone. However, recreational disturbance is not considered to be a threat to this site. There is limited parking, therefore most visitors will be cyclists or on foot. The site's favourable condition status indicates that existing levels of use are not impacting the qualifying grassland habitats, despite the proximity of existing housing immediately north of the M2, approximately 1km from the SAC. As such, there are no likely significant effects associated with recreational disturbance.

6.4 Effects of the Plan In-combination

Appendix E provides a review of other plans and projects that have been considered to identify those that could contribute to significant effects in conjunction with the plan. Those listed below are most likely to act in conjunction with the plan to result in significant effects and have therefore been scoped into the in-combination assessment:

- Tonbridge and Malling Core Strategy 2007³⁵, Development Land Allocations Development Plan Document 2008³⁶, Managing Development and the Environment DPD³⁷, saved policies from the Local Plan³⁸ and Local Plan Issues and Options 2016³⁹;
- Bearing Fruits 2031: The Swale Borough Local Plan 2017⁴⁰;
- Maidstone Borough Local Plan 2017⁴¹;
- Peter's Village; and
- The Lower Thames Crossing⁴².

³⁵ Tonbridge & Malling Borough Council, (2007); 'Local Development Framework. Core Strategy. As adopted by the Council 25 September 2007.'

³⁶ Tonbridge & Malling Borough Council, (2008); 'Development Land Allocations Development Plan Document. As adopted by the Council April 2008.'

³⁷ Tonbridge & Malling Borough Council, (2010); Managing Development and the Environment DPD.'

³⁸ Tonbridge & Malling Borough Council, (2010); 'Tonbridge and Malling Borough Council Local Development Framework. Compendium of Saved Policies. April 2010.'

³⁹ Tonbridge & Malling Borough Council, (2016) 'Tonbridge & Malling Borough Council Local Plan. 'The Way Forward'. Regulation 18. Issues and Options'

⁴⁰ Swale Borough Council, (2017); 'Bearing Fruits 2031: The Swale Borough Local Plan, Full Council Item, 26th July 2017.'

⁴¹ Maidstone Borough Council, (2017); 'Maidstone Borough Local Plan. Adopted 25 October 2017.'

⁴² Highways England, (2017); 'Lower Thames Crossing Scheme Number HE540039. Environmental Impact Assessment. Scoping Report.'

6.4.1 Policies

In line with Table 3, the screening assessment has not identified any policies that have an effect that is not likely to be significant alone, therefore none of the policies have been screened in due to likely significant in combination effects.

6.4.2 Site Allocations

6.4.2.1 The Swale SPA/Ramsar

As discussed in 6.3.2.2, there are no likely significant effects on this site due to the plan alone as there are no site allocations within 6km. However, there are likely significant effects on this European site as the plan is likely to contribute towards recreational pressure across the north Kent marshes in conjunction with other plans, most notably Swale Borough Local Plan.

As there are no site allocations in close proximity to the SPA/Ramsar site, there are no likely significant effects of the plan associated with reduced air or water quality in combination with other plans, specifically Swale Borough Local Plan. The HRA screening report concluded that an adequate policy framework is in place within the Local Plan to enable a conclusion that there are no likely significant effects, including with respect to reduced water and air quality.

6.4.2.2 Peter's Pit SAC

This SAC is located within Tonbridge and Malling. The HRA screening report⁴³ for the Local Plan states that the SAC lies immediately adjacent to one of the strategic housing sites listed in Core Policy CP16. This development (Peter's Village) now has planning permission and is under construction, due for completion in 2022. The issue of impact upon the SAC was a material consideration taken into account in determining the planning application. A nature conservation management regime for the site was secured by condition and legal agreement. Project-level mitigation of potential impacts associated with this development ensures that the plan will not contribute towards likely significant in combination effects on this SAC.

6.4.2.3 Queendown Warren SAC

This SAC is located within Swale borough, but is also close to neighbouring Maidstone. Therefore in combination effects have been assessed in conjunction with the local plans for these districts.

The SAC is 5km in a straight line from the nearest significant population in Swale and approximately 8km by road. The nearest residential provisions within the Maidstone are 0.9km and 1.7km from the SAC; these are gypsy and traveller site allocations, with the next nearest residential site allocation located 7.3km from the SAC. HRA screening reports for local plans for Swale⁴⁴, and Maidstone⁴⁵ conclude that, since the main

⁴³ Tonbridge and Malling Borough Local Development Framework, (2006); 'Habitats Regulations – Appropriate Assessment Screening.'

⁴⁴ URS Infrastructure and Environment UK Limited (2015); 'Bearing Fruits 2031: The Swale Borough Local Plan Part 1: Submission Version Habitats Regulations Assessment Screening.'

⁴⁵ AECOM, (2016); 'Habitats Regulations Assessment for: Maidstone Borough Local Plan - Publication (Regulation 19). February 2016.'

population centres lie outside the probable core recreational catchment of this SAC, it is considered that no likely significant effect of the respective local plans will arise either alone or in combination with other projects and plans. As such, no likely significant effects in combination with other plans and projects have been identified.

6.5 Conclusions

Table 8 summarises the results of the screening assessment in accordance with the following categories:

- Likely significant effects have been identified or the significance of effects are uncertain and therefore AA is required (indicated by a tick ✓); and
- No likely significant effect and therefore AA is not required (indicated by a cross ✕).

Table 8 Summary of Screening Results

European Site	Likely Significant Effects			
	Habitat Fragmentation and Loss	Disturbance	Reduced Water Levels and Quality	Reduced Air Quality
Medway Estuary and Marshes SPA and Ramsar	✓	✓	✓	✓
Thames Estuary and Marshes SPA/Ramsar	✓	✓	✓	✓
The Swale SPA/Ramsar	✓	✓	✕	✕
North Downs Woodlands SAC	✕	✕	✕	✓
Peter's Pit SAC	✕	✕	✕	✓
Queendown Warren SAC	✕	✕	✕	✕

7 Appropriate Assessment

7.1 Scope

The AA reviews the policies in Table 7 that were screened and provides recommendations for plan level mitigation for likely significant effects on European sites, as summarised in Table 8.

With respect to each European site, the AA provides an assessment of the effects of the plan in relation to the conservation objectives, outlines any further mitigation measures, and then concludes on whether the plan is considered to have an adverse impact on the integrity of European sites.

A comparative appraisal of the four scenarios is provided taking into consideration the mitigation measures applied and conclusions of the AA.

7.2 Medway and Thames Estuary and Marshes SPA/Ramsar Sites and The Swale SPA/Ramsar

These sites have been considered together as impact pathways associated with potential development in the plan apply to all three sites.

7.2.1 Conservation Objectives

Ensure that, subject to natural change, 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 populations of qualifying features; and,
- The distribution of qualifying features within the site.

7.2.2 Assessment of Effects

7.2.2.1 Habitat Fragmentation and Loss

Part of the site allocation for Medway Commercial Park (Kingsnorth) falls within Medway Estuary and Marshes SPA and Ramsar site, meaning that there is a potential for habitat loss within this European site.

There are allocations for housing, employment and schools within the North Kent Marshes Functional Land IRZ, which may provide supporting habitats to the north Kent marshes European sites. Applications within these areas have the potential to result in the loss or fragmentation of habitats used by features of the European sites.

The potential habitat loss resulting from developments within these allocated areas could limit the ability of the sites to achieve conservation objective 1 in terms of the extent and distribution of habitats, and therefore constitute adverse effects.

7.2.2.2 Disturbance

There is a potential for increased recreational pressure associated with the allocation of housing, particularly within 6km of the north Kent marshes European sites. This has been acknowledged in Policy NE1 and an approach agreed with Natural England to manage recreational pressures.

Direct disturbance of species which are features of these European sites could also occur through the proposals to encourage recreational use along the River Medway. This includes the introduction of water taxis as indicated in policy T5, the promotion of marine-based tourism in policy E3 and the proposal for potential development for Gillingham Football Club at Mill Hill given its proximity to Medway Estuary and Marshes SPA/Ramsar site. Development associated with housing and employment allocations adjacent to and in close proximity to Medway and Thames Estuary and Marshes SPA/Ramsar sites could also disturb qualifying bird species of these sites due to noise and lighting.

Disturbance of birds and any resulting displacement would affect the distribution of bird features and limit the ability of these sites to meet the requirements of conservation objective 5 and therefore constitute an adverse effect on these sites.

7.2.2.3 Reduced Water Levels and Quality

The site allocations at the Kingsnorth (Ref. 0647 and 0730), the National Grid Property, Pier Road, Gillingham, Bennetts Orchard, Lower Rainham (Ref. 0849) and Steelfields, Danes Hill, Gillingham (Ref. 1109) have a potential to impact water quality and levels. This is due to their proximity to Medway Estuary and Marshes SPA/Ramsar site and its inclusion within the North Kent Marshes Functional Land IRZ. However some of these allocations include areas of brownfield land. The same also applies to the Grain employment site, although this site is also close to Thames Estuary and Marshes SPA/Ramsar site.

The Medway shows symptoms of eutrophication, particularly growth of green algae which covers large areas of the intertidal mudflats in late summer. Studies by the Environment Agency also indicate that the waters in the Medway and Thames estuaries are hyper-nutriented for nitrogen and phosphorus. Water quality and sources of nutrient inputs are subject to further investigation by the Environment Agency as part of the Agency's review of consents under the Habitats Regulations.

Therefore, any applications which are likely to affect water quality and supply within the marshland habitats used by the features of the European sites have the potential to affect those habitats and their ability to support those features. Such effects could prevent the European Sites from achieving conservation objectives 2, 4 and 5 and therefore have the potential to give rise to adverse effects on the integrity of those sites.

7.2.2.4 Reduced Air Quality

The main roads within 200m of each of the designated sites, where the EPUK/IAQM criterion are met are outlined in Table 9.

Table 9 Main Roads within 200m of Designated Sites where Screening Criteria were met

Thames Estuary and Marshes SPA/Ramsar	Medway Estuary and Marshes SPA/Ramsar
Buckland Road, Rectory Road, Grain Road, Avery Way	Yokosuka Way, Gads Hill, Lower Rainham Road, Mariners View, Lower Woodlands Road, Plantation Road, West Motney Road, Grain Road, Owens Way

The criteria set out in the EPUK/IAQM for which a quantitative air quality assessment may be required (refer to section 5.3.2) were met at roads adjacent to the sites for a number of future assessment years and scenarios, as shown in Table 10 and Table 11. The assessment focussed on those scenarios and assessment years which have the potential to generate the greatest impact or result in exceedances of the critical loads and standards at each of the designated sites, as highlighted in blue.

Table 10 Scenarios and Assessment Years where EPUK/IAQM Criterion are met at Medway Estuary and Marshes SPA/Ramsar site

Assessment Year	Scenarios where EPUK/IAQM Criterion are met			
	1	2	3	4
2023	Y	Y	Y	Y
2028	Y	Y	Y	Y
2035	Y	Y	Y	Y

Table 11 Scenarios and Assessment Years where EPUK/IAQM Criterion are met at Thames Estuary and Marshes SPA/Ramsar site

Assessment Year	Scenarios where EPUK/IAQM Criterion are met			
	1	2	3	4
2023	N	N	N	N
2028	Y	Y	Y	Y
2035	Y	Y	Y	Y

The assessment focussed on the closest part of the designated sites to the roads which are predicted to have the greatest increase in traffic as a result of the plan scenarios. For both Medway and Thames Estuary and Marshes SPA/Ramsar sites, this comprised Ordnance Survey (OS) grid reference TQ 84492 75603, where the A228 passes through Medway Estuary and Marshes SPA/Ramsar site and along the boundary with Thames Estuary and Marshes SPA/Ramsar site, which is adjacent to Grain Road.

The results for scenario 3 in 2035 are shown in Appendix F. There is the potential for an increase in nitrogen deposition rates as a result of the predicted increases in traffic volumes as a result of the plan. Current nitrogen deposition rates exceed the lower critical load level for the habitats within the European sites, which is likely to be contributing to the existing issues of eutrophication within the Medway Estuary. However, the increase would not cause the upper critical load to be exceeded and, due to predicted improvements in air quality by 2035, it is predicted that even with the increase, the deposition rate would be less than the current average rate recorded on the APIS website.

The assessment of nitrogen deposition rates above is limited to the predicted increase in emissions resulting from changes in traffic volumes associated with anticipated

development. It is not possible at this stage to assess the full impacts on air quality as a result of emissions from employment areas or from heating strategies within residential areas. It is therefore necessary to take a precautionary approach and assume that adverse effects on the integrity of sites could occur as a result of the policies and site allocations.

7.2.3 Mitigation Measures

The following mitigation measures are recommended to be included in future iterations of the proposed Local Plan as it is developed to avoid or reduce effects on these European sites:

- The boundary of the Medway Commercial Park (Kingsnorth) allocation needs to be revised to prevent encroachment onto Medway and Thames Estuary SPA/Ramsar site, which would be contrary to the conservation objective to maintain the extent and distribution of the habitats of the qualifying features;
- Project level survey work and assessment is required for any developments in the allocated sites for housing, employment and schools within the North Kent Marshes Functional Land IRZ to ascertain the importance of these habitats to qualifying species and establish whether there is potential for the development to adversely impact the integrity of European sites. Any applications within these allocated sites should be subject to a project level HRA;
- Adequate facilities for recreation should be incorporated into development proposals, particularly for dog walking on and off the lead. Large scale developments and those within close proximity to the north Kent Marshes European sites, most notably at Chatham Docks, Lodge Hill, Hoo St Werburgh and Steelfields on Danes Hill in Gillingham would be required to deliver bespoke mitigation in conjunction with the required contribution towards a SAMMS, to adequately offset disturbance impacts associated with the development. This could include measures to encourage on site recreation, enhance supporting habitats and buffer or shield the site from noise and lighting during the construction and operation of the development. These measures should be developed in consultation with Natural England and assessed through a project specific HRA;
- Proposals that encourage recreation along the River Medway, in line with policies T5, T6 and E3, would need to be supported by an HRA, given the level of growth predicted in the region and the potential for disturbance, particularly with respect to activities in the open water and intertidal zone. Consideration should be given to the feasibility of introducing water taxis along the River Medway as indicated in policy T5, in light of the requirements of the Habitats Regulations. Detailed studies would need to be undertaken to establish whether this use can be accommodated and where and how mitigation should be implemented to minimise impacts, such as avoiding the core overwintering period between November and February;
- Consideration should be given to the viability of the proposal for potential development for Gillingham Football Club at Mill Hill, given its proximity to Medway Estuary and Marshes SPA/Ramsar site. This includes its potential to provide supporting habitat to the north Kent marshes European sites and the levels of disturbance that could be expected in terms of lighting, noise and recreational disturbance. While this site would not need to meet the requirements of a SAMMS as it is not residential, there is a potential that large volumes of people attracted to this location could contribute towards recreational pressure within these sensitive habitats;

- Policy NE7 requires consideration of the impact of proposals on surface and groundwater systems and the incorporation of appropriate mitigation measures. However, this should be extended to ensure that development proposals that pose material risk or harm to the quality and/or quantity of ground waters, surface waters, wetlands or coastal water systems either alone or in combination will not be permitted, to avoid likely significant effects on European sites associated with reduced water quality and levels. Furthermore, the policy should be expanded to ensure that major proposals for new development demonstrate that there are, or will be, adequate water supply and waste-water treatment facilities in place to serve the whole development;
- Given the level of growth promoted by the plan, Policy I1 should consider making explicit reference to the environmental impacts of proposed growth on the utilities network, to demonstrate the importance of the timely and effective delivery of infrastructure;
- Policy NE9 should be strengthened to take heed of predicted impacts on traffic flows across the network and impacts associated with nitrogen deposition. The policy should commit to:
 - Monitoring of air quality at key locations within or close to the proposed strategic sites, including the receptor locations identified in this report;
 - Supporting and seeking opportunities for a wider approach to the management of air quality in north Kent in co-operation with surrounding authorities;
- The plan should consider opportunities for the phasing and management of construction to minimise any impact on air quality (especially from vehicular movement).
- Proposed developments likely to give rise to increased air quality emission, either directly or through changes in traffic volumes, should be subject to detailed modelling and a project level HRA to determine if the exceedances of the critical load are considered to be significant and whether adverse effects could occur.

7.2.4 Integrity Test

With the inclusion of the mitigation measures outlined above it is concluded that the plan is unlikely to give rise to an adverse effect on the integrity of the Medway and Thames Estuary and Marshes SPA/Ramsar sites and The Swale SPA/Ramsar. This is because any proposed developments that might give rise to adverse effects would fail the integrity test in the project level HRA and not be consented.

However, high level air quality assessment has identified effects relating to nitrogen deposition at Medway and Thames Estuary and Marshes SPA/Ramsar sites, with respect to the reference case and the worst-case assessment year and scenario for the plan. As such, further assessment is planned to inform selection of the preferred option. This would establish whether the plan would hinder these European sites from meeting their conservation objectives and therefore whether there are considered to be adverse impacts on the integrity.

7.3 North Downs Woodlands SAC

7.3.1 Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

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

7.3.2 Assessment of Effects

7.3.2.1 Reduced Air Quality

The criterion set out in the EPUK/IAQM for which a quantitative air quality assessment may be required (refer to section 5.3.2) were met at roads adjacent to the site for a number of future assessment years and scenarios. These are Lidsing Road, Harp Farm Road, Detling Hill, The Street and Pilgrims Way. The assessment focussed on those scenarios and assessment years which have the potential to generate the greatest impact or result in exceedances of the critical loads and standards at the sites, as highlighted in blue.

Table 12 Scenarios and Assessment Years where EPUK/IAQM Criterion are met at North Downs Woodlands SAC

Assessment Year	Scenarios where EPUK/IAQM Criterion are met			
	1	2	3	4
2023	Y	Y	Y	Y
2028	Y	Y	Y	Y
2035	Y	Y	Y	Y

The assessment focussed on the closest part of the designated site to the roads which are predicted to have the greatest increase in traffic as a result of the plan scenarios. This comprised the following locations:

- OS grid reference TQ 79400 58446 at the eastern edge of Wouldham to Detling Escarpment SSSI, comprising the eastern portion of the SAC located outside Medway.
- OS grid reference TQ 75308 60257 at the western edge of Wouldham to Detling Escarpment SSSI, comprising the eastern portion of the SAC located outside Medway; and
- OS grid reference TQ 68634 63016 at the eastern edge of Halling to Trottscliffe Escarpment SSSI, comprising the western portion of the SAC that falls partly within Medway (although this point is outside Medway to the south).

In scenario 1, the increases in air quality emissions are predicted to cause further exceedance of the upper critical load for the two woodland habitats (current deposition

rates exceed the critical load and exceedances are still predicted in 2023 (both woodland habitats) and 2028 (yew woodland)). Exceedance of the upper critical load for yew woodland is also predicted under scenario 3 in 2028 at the three locations assessed. The upper critical load for beech woodland is also exceeded under this scenario in 2028 at the Wouldham to Detling Escarpment SSSI (East) component of the SAC, however at the other two locations the upper limit is not exceeded. The exceedance of the critical loads is likely to affect the structure and function of the woodland habitats, through changes to species composition, and therefore is likely to affect the ability of the site to achieve its conservation objectives.

The current background deposition rates exceed the upper critical load levels for both of these woodland habitats and by the assessment years the rates only fall below the upper limit for beech woodland by 2028.

Predicted background deposition rates for the grassland habitat do not exceed the lower critical load limit. The predicted increases only cause the lower critical load limit to be exceeded under scenario 1 in 2023 at the Wouldham to Detling Escarpment SSSI (East) component of the SAC.

The predicted changes in traffic volumes as a result of the allocated developments have the potential to further exacerbate existing air quality issues affecting yew and beech woodlands within the North Downs Woodlands SAC and therefore the plan has the potential to give rise to adverse effects. The grassland feature of the SAC is unlikely to be affected as a result of air quality emissions.

7.3.3 Mitigation Measures

Proposed developments likely to give rise to increased air quality emission, either directly or through changes in traffic volumes, should be subject to detailed modelling and a project level HRA to determine if the exceedances of the critical load are considered to be significant and whether adverse effects could occur.

7.3.4 Integrity Test

With the inclusion of the mitigation measures outlined above, it is concluded that the plan is unlikely to give rise to an adverse effect on the integrity of the North Downs Woodlands SAC, as any proposed developments that might give rise to adverse effects would fail the integrity test in the project level HRA and not be consented.

However, high level air quality assessment has identified significant effects relating to nitrogen deposition, both at Wouldham to Detling Escarpment SSSI and Halling to Trottscliffe Escarpment SSSI, with respect to the reference case and the worst-case assessment year and scenario for the plan. As such, further assessment is planned to inform selection of the preferred option. This would establish whether the plan would hinder these European sites from meeting their conservation objectives and therefore whether there are considered to be adverse impacts on the integrity.

7.4 Peter's Pit SAC

7.4.1 Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying species;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

7.4.2 Assessment of Effects

7.4.2.1 Reduced Air Quality

The criterion set out in the EPUK/IAQM for which a quantitative air quality assessment may be required (refer to section 5.3.2) were met at roads adjacent to the site, namely Hall Road and Church Road, for a number of future assessment years and scenarios, as shown in Table 13. The assessment focussed on those scenarios and assessment years which have the potential to generate the greatest impact or result in exceedances of the critical loads and standards at the sites, as highlighted in blue.

Table 13 Scenarios and Assessment Years where EPUK/IAQM Criterion are met at Peter's Pit SAC

Assessment Year	Scenarios where EPUK/IAQM Criterion are met			
	1	2	3	4
2023	N	N	N	N
2028	N	N	N	N
2035	Y	Y	Y	Y

The assessment focussed on the closest part of the designated site to the roads which are predicted to have the greatest increase in traffic as a result of the plan scenarios. This comprised the western edge at OS grid reference TQ 71372 62687, adjacent to Hall Road.

Whilst the background nitrogen deposition rate is still predicted to exceed the lower critical load limit in 2035, the increase as a result of traffic changes resulting from site allocations within the plan is minimal and will not cause the upper limit to be exceeded. Even with the predicted increase, the deposition rate will still be lower than the current deposition rate which exceeds the upper limit. Integrity Test

Whilst increased nitrogen deposition may affect the species composition of habitats within the SAC, this is unlikely to have a significant effect on the suitability of the water bodies within the SAC for breeding great crested newts, which is the qualifying feature of this SAC. The extent, distribution, structure and function of the habitats of great crested newts; the supporting process on which the habitats rely; and the populations and

distribution of great crested newt would be maintained. As such, it is considered that the plan would not hinder Peter's Pit SAC from achieving its conservation objectives and the predicted increase in nitrogen deposition is not likely to constitute an adverse effect on integrity.

8 Further Recommendations

In addition to the mitigation measures identified in Section 7 above, the following recommendations are made in relation to the wording of specific policies which should be implemented in future stages of the draft local plan.

8.1.1 Policy DS2: Spatial Development Strategy

This policy should be amended to ensure the protection of European sites, given that the spatial development strategy encourages development in close proximity to Medway and Thames Estuary and Marshes SPA/Ramsar sites. The policy should also incorporate appropriate wording clarifying that a riverside walk would need to be carefully designed to protect European sites from recreational disturbance. Although not necessary to state in policy, development proposals that promote access to European sites for recreation would need to be subject to an HRA to ensure that there are no adverse impacts to integrity.

8.1.2 Policy H1: Housing Delivery

The policy should incorporate appropriate wording ensuring the protection of European sites, as delivering the objectively assessed need for housing will put significant pressure on these habitats. The policy should state that an HRA needs to support development proposals that could impact European sites, to maintain the integrity of the Natura 2000 network. The policy should also highlight the requirement for residential development within 6km of the north Kent marshes European sites to make a financial contribution towards the protection of these sites through a SAMMS, referring to policy NE1.

8.1.3 Policy H7: Houseboats

Further detail is required with respect to the second bullet point concerning the criteria under which any further growth of houseboats will be allowed, specifying that this will include avoidance of adverse impacts on the integrity of European sites. The growth of houseboats should be closely controlled given that some are located within European sites and potential impacts of water quality associated with waste water disposal.

8.1.4 Policy H10: Gypsy, Traveller and Travelling Showpersons

Given that this policy does not specify locations for new sites, additional wording should be incorporated to avoid indirect impacts on the integrity of European sites, including the loss of supporting habitats and disturbance.

8.1.5 Policy E1: Economic Development

The policy should incorporate appropriate wording ensuring the protection of European sites, as delivering the employment land identified in the Employment Land Needs Assessment in the locations proposed could impact Medway and Thames Estuary and Marshes SPA/Ramsar sites. This policy should also prioritise or ideally ensure development within the existing site allocation boundaries at Kingsnorth, to avoid the potential loss of supporting habitat to Medway Estuary and Marshes SPA/Ramsar site (refer to section 6.3.2.1). Any planning application for development that could impact

European sites, particularly those relating to development outside the existing boundary, would need to be supported by an HRA to ensure that any adverse impacts on integrity are avoided.

8.1.6 Policy RTC2: Sequential Assessment and Policy RP3³³: Impact Assessments

The preference of main centre uses in Chatham and other urban centres is supported, however, these policies need to incorporate appropriate wording ensuring the protection of European sites to provide appropriate mitigation for the development of main centre uses at the edge of or out of town centres. It is also recommended that the further criteria are applied to the out of centre option, to avoid development in close proximity to European sites that could increase recreational pressure.

8.1.7 Policy NE5: Securing strong Green Infrastructure

As highlighted previously with respect to policy DS2, policies that promote enhancements to the network of public rights of way along the riverside need to be supplemented with appropriate wording ensuring the protection of European sites. Planning applications that could enhance recreational pressure within the north Kent marshes would need to be supported by an HRA.

This policy should also ensure the protection, maintenance and enhancement of supporting habitats to European sites and prevent development that could lead to the loss or fragmentation of these habitats unless it can be demonstrated that adverse impacts to the integrity of European sites can be adequately mitigated.

8.1.8 Policy T3: Hoo Peninsula rail connection

This policy should provide criteria under which proposals for development on the Hoo Peninsula will be encouraged, including the protection of European sites. This should highlight a requirement for all residential development to make a financial contribution towards the management and protection of the north Kent marshes through a SAMMS, with reference to policy NE1. Also the requirement for project level HRA where there is a potential for negative effects on European sites.

8.1.9 Policy T5: Riverside Infrastructure

This policy does not provide adequate mitigation for potential adverse impacts on the north Kent marshes European sites, given that and possible introduction of visitor and river taxi services would be likely to attract tourists and residents and therefore contribute towards recreational disturbance. The provision of new riverside infrastructure may also result in the loss of supporting habitat. With this in mind, the policy should require that, if introduced, water taxis remain within the urban waterfront and not travel further downstream than Lower Upnor. The last paragraph should also be strengthened to require that development does not result in the loss of supporting habitats, or otherwise adversely impact the integrity of European sites.

8.1.10 Policy MWE2: Land-won extraction of sands and gravels

The 250m consultation areas surrounding the areas of search for the extraction of sands and gravels should be amended to exclude land within European sites. Furthermore, the policy should incorporate appropriate wording ensuring the protection of European sites, even in the event of demonstrable overriding benefits that justify development, to ensure compliance with the Habitats Regulations. Consideration should be given to amending the areas of search to provide a buffer preventing development immediately adjacent to Medway Estuary and Marshes SPA/Ramsar site to mitigate potential impacts.

8.1.11 Policy MWE3: Land-won minerals: chalk and clay

The policy should incorporate appropriate wording ensuring the protection of European sites, even in the event of demonstrable overriding benefits that justify development, to ensure compliance with the Habitats Regulations.

8.1.12 Policy MWE7: New Waste Management Facilities

This policy text relating to the development of waste management within existing industrial estates that utilise the river Medway as a means of transport should provide a clause that ensures the protection of European sites.

8.1.13 Policy MWE9: Waste disposal to land

The list of criteria under which the creation of waste disposal facilities will be permitted within the Land Resource Areas should incorporate appropriate wording ensuring that development avoids adverse impacts on the integrity of European sites.

9 Comparative Review of Scenarios

The key considerations in the comparison of the four scenarios are constraints associated with site allocations that may provide supporting habitat to the north Kent marshes European sites and significant effects associated with the deposition of nitrogen within Medway and Thames Estuary and Marshes SPA/Ramsar sites and North Downs Woodlands SAC.

Appropriate mitigation has been identified in this document to avoid significant effects on the north Kent marshes European sites associated with the allocation of sites within the North Kent Marshes Functional Land IRZs. Further survey work and assessment is required to fully assess the constraints in light of the requirements of the Habitats Regulations, particularly in combination with other plans and projects. The majority of the site allocations within the North Kent Marshes Functional Land IRZs are part of all four scenarios, with the exception of the following:

- Land West of Lower Stoke (Ref. SO8) – only scenarios 1, 2 and 3;
- Middle Street Farm, Grain Road, Middle Stoke (Ref. 0794) – only scenarios 1, 2 and 3;
- Bennetts Orchard, Lower Rainham (Ref. 0849) – only scenarios 1, 3 and 4;
- Land west of Lower Station Road, Rainham (Ref. 0800) - only scenarios 1, 3 and 4;

- Rear of Lower Rainham Road/Station Road, Rainham (Ref. UB4g) - only scenarios 1, 3 and 4; and
- Wooleys Orchard, land south of Lower Rainham (Ref. 0749) - only scenarios 1, 3 and 4.

A review of aerial mapping confirms that these sites support areas of open space that have potential to provide supporting habitat. The exclusion of some of these site allocations from scenarios 2 and 4 indicates that these scenarios are preferable when considering the implications of supporting habitat. However, this is a high level assessment; constraints would need to be verified through survey work and assessment.

Scenario 3 presents the worst-case scenario in terms of predicted increases in traffic flows and therefore the greatest increase in NO_x concentrations at Medway and Thames Estuary and Marshes SPA/Ramsar and North Downs Woodlands SAC. Scenario 3 relates to meeting the Government's calculation of the local housing need, which is considered to be challenging to deliver. There are also significant effects on North Downs Woodlands SAC (Wouldham to Detling Escarpment SSSI) relating to scenario 1.

At this interim stage, prior to the completion of strategic air quality modelling, scenario 3 is the least preferable option, followed by scenario 1. Scenarios 2 and 4 provide the best options both in terms of potential impacts on supporting habitats and significant effects associated with increased nitrogen deposition.

10 Conclusions

10.1 Screening

The screening assessment identified a range of policies and site allocations that should be subject to AA. Likely significant effects were identified with respect to Medway and Thames Estuary and Marshes and The Swale SPA/Ramsar sites and North Downs Woodlands and Peter's Pit SACs due to habitat loss and fragmentation, disturbance, reduced water levels and quality and reduced air quality. Queensdown Warren SAC was screened out of the AA as no likely significant effects, either alone or in combination with other plans and projects, were identified.

10.2 Appropriate Assessment

The incorporation of measures described in this document, including further assessment as required through project level HRAs, would ensure that the plan would not hinder European sites from achieving their conservation objectives. However, further air quality assessment is required to inform selection of the preferred option and establish whether likely significant effects associated with predicted increases in the deposition of nitrogen at Medway and Thames Estuary and Marshes SPA/Ramsar sites and North Downs Woodlands SAC would lead to adverse impacts on integrity.

10.3 Comparison of Scenarios

At this interim stage, prior to the completion of strategic air quality modelling, scenario 3 is the least preferable option, followed by scenario 1. The assessment indicates that scenarios 2 and 4 provide the best options both in terms of potential impacts on supporting habitats associated with the north Kent marshes and significant effects associated with increased nitrogen deposition on Medway and Thames Estuary and Marshes SPA/Ramsar sites and North Downs Woodlands SAC.

10.4 Further Steps

The recommendations of this report will be used to inform the emerging Local Plan, with updates planned throughout future stages of the plan's development. These updates will respond to changes to the plan and consultation comments.

Strategic air quality modelling is planned for the coming months, including consideration of in-combination effects. This should include consideration of predicted traffic flows associated with the Lower Thames Crossing. The results of this work would be incorporated into this report and the assessment updated and submitted during the consultation window to inform selection of the preferred option. Full air quality modelling of the preferred option is planned at the Regulation 19 consultation stage.

Appendix A

Medway Local Plan
Development Options Habitats
Regulations Assessment
Screening Consultation

Date: 25 May 2017
Our ref: 213487
Your ref: -



Catherine Smith
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Physical & Cultural Regeneration
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By email only, no hard copy to follow

Dear Catherine

**Medway Local Plan – Development Options
Habitats Regulations Assessment – Screening Report**

Thank you for your letter of the 13 April 2017 consulting Natural England on the Habitats Regulations Assessment (HRA) Screening Report prepared for the Medway Local Plan Development Options consultation document. Natural England's response to this Screening Report should be considered in conjunction with our advice on the Local Plan Development Options Consultation and the accompanying Sustainability Appraisal and supporting evidence provided in our letter of the 18 April 2017 (our reference 206265)

Natural England welcomes the opportunity to provide comments on the Habitats Regulations Screening Report. Understandably at this early stage of the Local Plan, the Screening Report relates to a very high level document which is not allocating specific sites or providing any policies in relation to conserving and enhancing the Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites within and adjacent to Medway. Our advice in this letter therefore provides guidance on the measures that the Council should consider as the local plan progresses to the preferred options or submission stage. The HRA process should be an iterative process reconsidering potential implications of the Plan at each stage, and recommending amendments as necessary to ensure impacts to the designated sites do not occur.

We consider therefore that it is premature for the HRA at this stage to exclude further consideration of potential impacts to the SACs, SPAs and Ramsar Sites on the basis that policies, which are not yet available for consultation, will ensure impacts to the designated sites do not occur. We advise that it would be more appropriate to await the publication of the draft policy wording and preferred site allocations before screening out potential impacts (either direct or indirect) from further consideration. This will give certainty that the development and economic growth in Medway during the lifetime of the Local Plan will not result in impacts to the designated sites.

Natural England notes that reference is made within the Screening Report to the HRA for neighbouring districts. Where the Medway Local Plan may have implications for European Sites outside of the district, we advise that the HRA should consider these in-combination with any residual effects from the Plans of neighbouring authorities rather than screening them out on the basis of assessments for adjacent Local Plans.

We further advise that the HRA should focus solely on implications for the habitats and species

associated with the SACs, SPAs and Ramsar Sites which could be impacted by proposals within the emerging local plan, rather than wider environmental implications. Wider environmental considerations such as the impacts of air quality on human health (as detailed in Paragraphs 3.68, 3.70 and 3.71 of the Screening Report), for example, are important requirements for the Local Plan to consider and address but these would appear to fit better within the Sustainability Appraisal as they are not directly relevant to the HRA. In addition, Natural England advise that consideration of the 'embodied energy in construction materials and increased energy use from new housing and employment development' does not need to be considered as part of the HRA for the Local Plan as these will be considered at a national level.

Paragraph 3.8 of the Screening Report details that land promoted through the Strategic Land Availability Assessment that has been used to identify the various spatial options all lie outside of the designated SACs, SPAs and Ramsar Sites. Natural England welcomes the commitment within Paragraph 3.13 in relation to the Medway Estuary and Marshes SPA and Ramsar Site which states that 'There is a risk that expansion of the employment areas could result in the loss of designated or supporting habitats. Any changes to the employment area boundaries that may be considered through the emerging Local Plan would need to be subject to a robust assessment to avoid the loss or fragmentation of designated or supporting habitats'.

The loss of habitat outwith the designated sites but which supports the species for which the site is important could result in significant indirect impacts. Natural England welcomes the consideration of such indirect impacts from the loss of supporting habitat or functionally-linked land within Paragraph 3.9 but we advise that this could extend significantly beyond 200 metres from the site boundary. Natural England has undertaken some research on the likely locations of functional land in north Kent and we would be pleased to work closely with the Council as the Local Plan proceeds to ensure that impacts are wherever possible avoided and, where this is not possible, fully mitigated.

Natural England agrees that the survey information currently available for the proposed development site at Lodge Hill suggests that it is not used by significant numbers of birds associated with the Medway Estuary and Marshes or the Thames Estuary and Marshes SPA or Ramsar Site (Paragraph 3.10). Given the nature conservation importance of the Chattenden Woods and Lodge Hill SSSI, it is key that all potential strategic allocation sites are considered with a similar level of ecological information to ensure that the sites with the lowest environmental impact are allocated.

Natural England welcomes the Council's continued support for and implementation of the Thames, Medway and Swale Strategic Access Management and Monitoring Strategy (SAMMS) as a means of managing indirect impacts from recreational disturbance to the coastal designated sites. Given the close proximity of some of the development options to the SPAs and Ramsar Sites, further bespoke mitigation measures may be required in addition to the standard tariff contribution to the SAMMS. Natural England would be pleased to discuss this in more detail with the Council to ensure that the development and regeneration aspirations within the emerging Local Plan can be fully met whilst conserving and enhancing the important nature conservation sites. Further details of any bespoke measures can of course then be included within site specific policy wording as the detail of the Local Plan increases prior to its submission.

In relation to potential impacts from air quality, Natural England welcomes the strategic transport assessment that is to be undertaken. This should help inform where air quality impacts resulting from increased traffic within 200 metres of a SAC, SPA or Ramsar Site could result from the Local Plan. The assessment threshold detailed within Paragraph 3.68 appears to be human health specific; in relation to the Habitats Regulations Assessment, the site and habitat specific critical loads and levels¹ will need to be considered as part of the assessment. In addition to traffic, air quality impacts from employment and industrial developments will also need to be considered as part of the HRA as the Local Plan evolves.

¹ Available from <http://www.apis.ac.uk/>

Given the time delay for observable habitat/vegetation changes to result from nutrient enrichment associated with air quality impacts, the effects of atmospheric pollution on species composition are difficult to record. Whilst, as detailed within Paragraph 3.75, the site specific information does not indicate that atmospheric pollution is currently having adverse effects on the qualifying features of any of the sites, we recommend that air quality impacts associated with the Local Plan will need to be revisited as part of the HRA as the detail of the Plan evolves. The critical loads and levels for the air quality assessment are set nationally based upon the habitat types present, not determined locally as suggested in Paragraph 3.75; the process contribution however needs to be assessed at the site specific level.

Natural England acknowledges that there are existing high levels of nitrogen deposition to coastal habitats, with much of the deposition being associated with developments in close proximity to the sites (Paragraph 3.76). However, in the absence of detailed site allocations, traffic data and policy wording, Natural England recommends that further testing through the HRA of the emerging Local Plan will be required to ensure that a likely significant effect will not result to coastal habitats.

A screening report should consider whether the Local Plan could result in a likely significant effect to a SAC, SPA or Ramsar Site and where these cannot be ruled out a more detailed Appropriate Assessment will be required to establish whether the plan or project will have an adverse effect on the integrity of the site. In the absence of detailed plans, traffic data and policy wording the approach in Paragraph 3.77 in which it is stated that 'it is unlikely that the development proposed in the emerging Local Plan along would have adverse effects on the integrity of the [North Downs Woodland] SAC through increased atmospheric pollution' appears premature. As such, Natural England recommends that further consideration of the potential implications for all of the SACs, SPAs and Ramsar Sites identified in the Screening Report should be undertaken as the detail of the Local Plan emerges.

Natural England advises that further consideration of the potential for in-combination air quality effects with other plans or projects will be required, focussing specifically on the process contribution that the Medway Local Plan will contribute. The Local Plan will only need to mitigate for its process contribution. Natural England would also recommend the Council considers the implications of the High Court judgment that was handed down on 20 March 2017 in *Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* [2017] EWHC 351² when considering in-combination air quality effects.

I trust these comments are helpful and we look forward to working closely with the Council as the Local Plan evolves to ensure that the vision and aspiration for Medway are realised and that our joint vision of a securing a sound Local Plan is achieved. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact me on 0208 0266 064 or by email to sean.hanna@naturalengland.org.uk.

Yours sincerely

Sean Hanna

Sean Hanna
Lead Adviser
Sussex and Kent Team

² The full judgement is available at <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>

Appendix B

Medway Local Plan
Development Strategy Habitats
Regulations Assessment
Consultation

Project title	Medway Technical Assessments	Job number 259372
Meeting name and number	Stakeholder Meeting 3/18	File reference
Location	Gun Wharf, Chatham	Time and date 13:00 25 January 2018
Purpose of meeting		
Present	Catherine Smith - Medway Council (Planning Lead) Valenie Smith, Matthew Pinder - Medway Council Adrian Thomas - RSPB (Project Manager) Carrie Marbank - RSPB James Dawkins - RSPB (National Planning Lead) Sean Hanna, Patrick McKernan - Natural England Greg Hitchcock - Kent Wildlife Trust Steven Harding - Arup (Senior Environmental Consultant) Gemma Turner - Arup (Senior Ecologist) Phil Fieldhouse (Environmental Consultant)	
Apologies	Environment Agency	
Circulation	Those present	

Action

3.1 Introductions

Natural England wants a sound local plan. They oppose development on lodge Hill but would like to see Objectively Assessed Need and housing targets (OAN) achieved. They recognise the difficult job Medway has, and advocates for the right outcome of a sustainable plan which considers environmental designations.

Kent Wildlife Trust would also like to see a sound local plan, and have a dedicated Local Plan Officer in Kent. They would like to see environmental concerns hold more weight than the National Planning Policy Framework (NPPF), and are opposed to development on Lodge Hill as an objective. They would like to see

Prepared by Phil Fieldhouse

Date of circulation

Date of next meeting

Minutes

Project title

Job number

Date of Meeting

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all alternatives considered and specific plans for green infrastructure development.

The RSPB focuses on nationally and internationally designated sites for the protection of birds and wildlife and recognise that a sound local plan is the best way to achieve this. Looking for a robust and transparent development and assessment of options and alternatives which aim to deliver housing needs with or without development on Lodge Hill. Will aim to assist council on delivery of plan without Lodge Hill development. Would like to review draft copies of the Habitats Regulations Assessment (HRA) and Sustainability Assessment (SA) before public consultation.

3.2 Background and Context

Responses from previous Regulation 18 consultation published with a vast amount of public opposition to development on Lodge Hill (11,500 responses out of a total 12,500 responses). This taken into account with an additional stage included to consider development alternatives excluding Lodge Hill.

Strong support for regeneration in Medway, but mixed opinions about how this could be delivered.

There are additional concerns of impacts affecting high quality farmland, air quality, the landscape, transport systems, schools, public health, and ecology.

Developers largely responded to the consultation in order to promote their sites for development.

3.2.1 Discussion

There is pressure to deliver the local plan due to a tight timeframe, speculation of developments, risk of government intervention, and a potential uplift in OAN (from < 20,000 to ~ 30,000) based on a change in methodology used by the Department for Communities and Local Government (DCLG) to calculate OAN. DCLG have been contacted for comment.

RSPB seek clarity on the site selection process. Why is Medway selecting Lodge Hill for development when there are other sites with less constraints? And, given Medway's declining population, why is there an increase in OAN?

A review of the population is needed. Message is being sent to government about the pressures and constraints faced by Medway, but there is a need to show ownership of issues to avoid intervention. Land for consideration presents issues relating to both

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environmental and agricultural constraints. Movement of people is difficult to manage, but there is inward migration from London and outward migration due to being priced out.

Natural England question the sustainability of the uplifted OAN figure. Is it possible to deliver this many houses?

Arup can undertake a sensitivity test to see how a change in numbers can impact on different objectives. This will identify issues within a specific context and therefore can determine most appropriate way of dealing with this. Sensitivity analysis will form part of the SA framework.

Future work will include more detail on the site selection process. Arup is to review Medway's approach as a critical friend

3.3 Delivering Development and Infrastructure Needs

Arup is to review Medway's approach towards understanding what infrastructure is required. Future work will include more detail on the site selection process.

Medway have opened a bid to consider use of freight railway line on the Hoo peninsula. This will form part of the options and would be a significant change if successful. Clarity is not likely until the submission document is finalised, however there are still issues with funding. DCLG advised against discussion of this due to uncertainty.

RSPB welcome the opening of the bid but expressed disappointment that this hadn't been considered until now. They question why other land, such as Round Top Hill which is adjacent to the entrance of Medway from the dual carriageway isn't under consideration when nationally designated sites are.

Medway responded that these sites aren't being promoted, and that the history of specific sites has led to this outcome. Further detail is not for discussion at this moment.

Arup can work this in to the assessment.

3.4 HRA

3.4.1 In combination plans and projects

Arup is to review HRA work completed to date and work closely with Medway to ensure a sound plan. Arup is to confirm the scope and seek clarifications, particularly regarding impacts on European sites within and external to Medway. Arup wish to undertake a proportionate assessment while considering Planning Inspectorate

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(PINS) and Kent County Council (KCC) projects, including Lower Thames Crossing project to increase capacity.

RSPB recognise that key plans have been considered but that there are large key projects involving infrastructure and housing that need to be included. They support a proportionate assessment and are willing to collaborate. They recommend Source, Pathway, Receptor (SPR) analysis and a buffer zone to filter projects and plans that need to be included.

In combination assessment of air quality is a key issue. Need to refer to local plans rather than the HRAs of those plans with respect to the in combination air quality assessment, specifically in relation to proposals that may influence air quality impacts. Review of pathways sufficient to avoid review of whole plans and measures can be implemented on a case by case basis.

3.4.2 Impacts – Habitat loss and fragmentation

NE holds information concerning supporting habitats that fall outside European sites that should be considered in the assessment.

NE to provide Arup with supporting habitats to European sites

3.4.3 Impacts – Disturbance due to increased recreational pressure

Dealt with through the Strategic Access Management and Monitoring Strategy (SAMMS). However, bespoke measures may be required to mitigate impacts to European sites at close proximity/large scale. This may require creative solutions, such as more accessible and attractive green space within developments and footpaths and screening within European sites. Soft measures can also work, and if written into policy, can incentivise developers to fund measures. Therefore, these measures need to be written into the Local Plan. Dialogue is required between local developers, Medway Council and NE; Kent have a dedicated officer for this. The Group and board are essential to review whether measures are working.

Medway Council to provide Arup with the SAMMS policy to inform the HRA

3.4.4 Impacts - Air quality

Air quality is a key impact to be considered in the assessment given the likely increase in traffic. Transport assessment is ongoing in collaboration with other councils. Impacts depend on method for impact assessment; is this based on thresholds or overall % increase?

Marion Ashdown is the air quality expert at Natural England.

Baseline air quality data should be obtained from the apis website.

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	<p>Whealdon District Council case law has implications for the in-combination assessment for air quality, with the picture changing rapidly. NE can give more detailed advice on dealing with this. The Discretionary Advice Service may be applicable.</p> <p>The HRA stopped at the screening stage previously. Important to push through to Appropriate Assessment given the knock-on effects on the robustness of the Local Plan.</p>	NE to confirm the implications of the Whealdon High Court judgement on the in-combination air quality assessment
3.4.5	European sites	
	Where providing compensatory habitat, there may be a need to consider other European sites.	
3.4.6	Other	
	RSPB is aware of a strategy for the Solent to protect/enhance supporting habitats, including new refuges and better protection. Arup can be put in contact with those involved.	
3.5	Sustainability Appraisal (SA)	
3.5.1	Arup's Role	
	Arup is reviewing the Issues and Options document in Regulation 18. Stage A of SA, scoping, has been undertaken which reviewed the baseline and context, developed the SA framework and tested this with the local plan and SA objectives. An interim SA was published including 4 development options and policy approaches.	
3.5.2	Framework revision	
	Arup to provide critical friend review to challenge Medway and ensure transparency and accountability. Baseline and context review being undertaken, and full review of SA objectives to be made to account for change in levels of detail and any emerging issues that are identified. Arup also welcoming input on policy and plans review to establish revised context.	
	SAs often a missed opportunity to thoroughly evaluate alternative and maximise sustainability. As a public facing document, interim SA will serve both as an audit trail and as an assurance that due process has been carried out.	
	Objectives relating to environment and biodiversity are unclear and will be reviewed to give more specific detail on objectives and monitoring.	

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Objective 8 (Previously Developed Land) should be reviewed to ensure that inherent value in sites, particularly post-industrial sites, is not lost. This should be carefully defined to avoid opposition.

Environment Agency (not present) may require clarification on best use of natural assets, water quality and climate change.

3.5.3 Monitoring

Early engagement in local plan very positive for developing monitoring measures. Arup welcoming input regarding monitoring and indicators to ensure that local plan policies can incorporate a robust monitoring framework in post adoption stage. Monitoring strategy will be included in interim SA.

Compensation for environmental impacts is not necessarily sustainable and every effort should be made to avoid impacts where possible. Such detail hasn't been provided thus far due to the high level nature of work undertaken. Such detail will become apparent as a result of the completion of this stage. Arup to ensure transparency as independent consultants, and provide an appropriate level of detail to make documents accessible to stakeholders and public.

3.5.4 Alternatives and assessment of alternatives

Lodge Hill to be assessed based on NPPF. Robust and transparent assessment required to ensure all direct and indirect impacts have been considered, and that there is a justification for the chosen options.

Whealdon District Council case law has implications concerning consideration of alternatives and Strategic Access Management and Monitoring Strategy (SAMMS). Medway has a corporate policy regarding SAMMS and council meetings are key to ensuring alternatives have been sufficiently considered.

3.5.5 Next steps

Full review ongoing. Comments will be taken on board alongside full review of context, baseline, framework, and objectives.

3.6 Local Plan going forward

Suite of documents to be published before Regulation 18 consultation to include detailed alternatives.

SLAA process has made significant progress in identifying development opportunities. Medway not opposed to sharing this prior to consultation, however may be limited on a technical level.

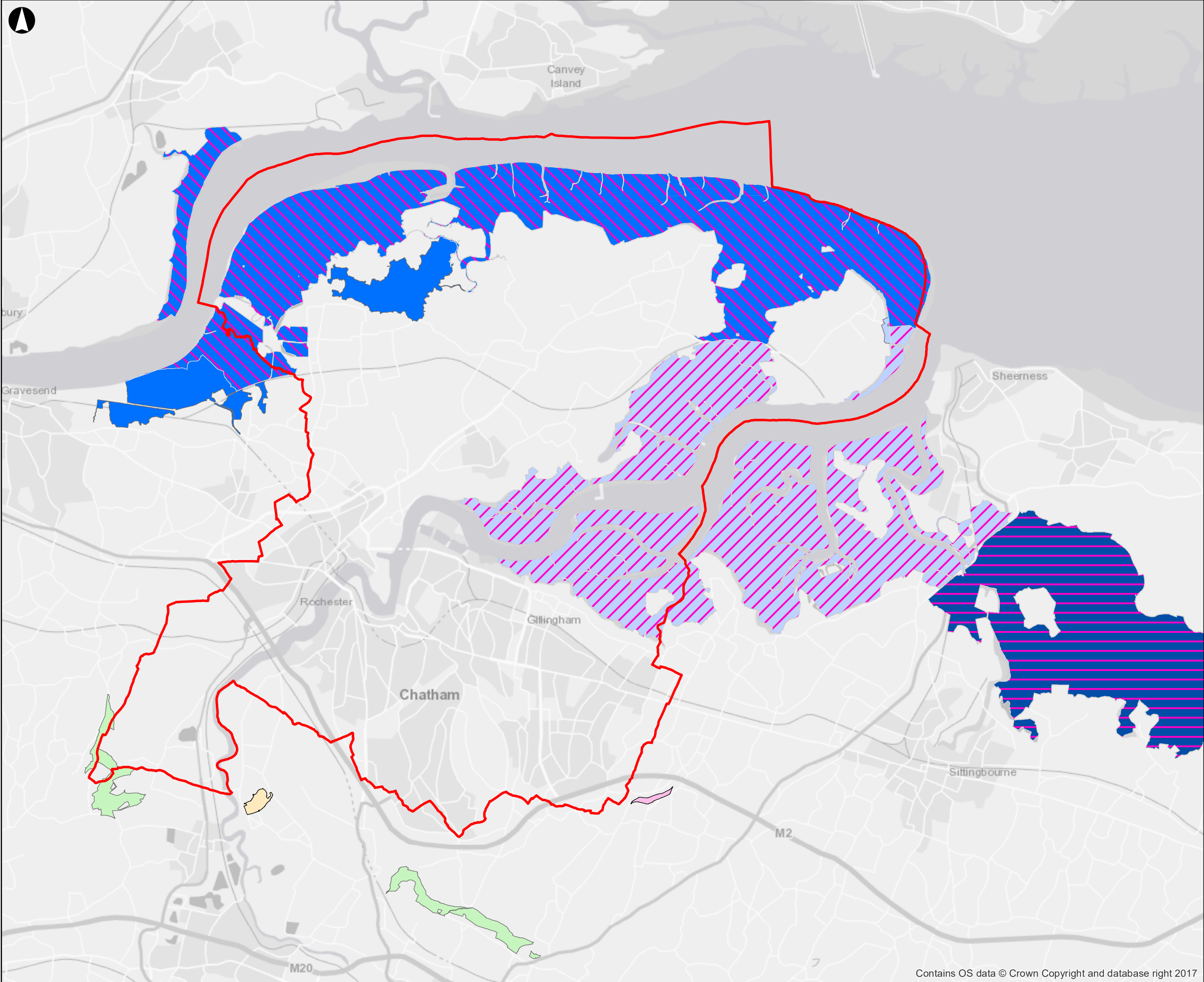
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<p>Robust assessment to be conducted to reflect the honest and frank relationship between Arup and Medway Council. Time pressures exist to turn around interim SA but this is achievable with continuation of positive and active engagement from stakeholders present. Arup to align SA publication to ensure delivery in conjunction with Medway Council.</p> <p>Further stakeholder workshop can be held to facilitate further consultation in late April/May. Responses to be given by June.</p>

Appendix C

European Sites



Legend

Medway Council

SPA

Medway Estuary & Marshes

Thames Estuary & Marshes

The Swale

SAC

Queendown Warren

North Downs Woodlands

Peters Pit

RAMSAR

Medway Estuary & Marsh

Thames Estuary & Marsh

The Swale

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Issue	Date	By	Chkd	Appd
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Metres

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1,300

2,600

5,200

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Client
Medway Council

Job Title
Medway Local Plan Technical Assessments

Habitats Regulations Assessment
European Sites

Scale at A3
1:100,000

Job No 259372-00	Drawing Status Issue
Drawing No 001	Issue P0

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MXD Location

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C1 Characteristics of European Sites

Site Name	Medway Estuary and Marshes	
Designation	SPA	Ramsar
Site Area	4686.32 ha	4696.74 ha
Qualifying Features	<p>During the breeding season the area regularly supports (Article 4.1):</p> <p>Pied avocet <i>Recurvirostra avosetta</i> - 6.2% of the breeding population in Great Britain;</p> <p>Little tern <i>Sterna albifrons</i> - 1.2% of the breeding population in Great Britain; and</p> <p>Common tern <i>Sterna hirundo</i> - 0.6% of the breeding population in Great Britain.</p> <p>Over winter the area regularly supports (Article 4.1):</p> <p>Bewick's swan <i>Cygnus columbianus bewickii</i> - 0.2% of the population in Great Britain; and</p> <p>Pied avocet <i>Recurvirostra avosetta</i> - 24.7% of the population in Great Britain;</p> <p>Over winter the area regularly supports (Article 4.2):</p> <p>Northern pintail <i>Anas acuta</i> - 1.2% of the population in Great Britain;</p> <p>Northern shoveler <i>Anas clypeata</i> - 0.8% of the population in Great Britain;</p> <p>Eurasian teal <i>Anas crecca</i> - 1.3% of the population in Great Britain;</p> <p>Eurasian wigeon <i>Anas penelope</i> - 1.6% of the population in Great Britain;</p>	<p>The site supports a number of species of rare plants and animals (Ramsar criterion 2). The site holds several nationally scarce plants, including:</p> <p>Sea barley <i>Hordeum marinum</i>;</p> <p>Curved hard-grass <i>Parapholis incurve</i>;</p> <p>Annual beard-grass <i>Polypogon monspeliensis</i>;</p> <p>Borrer's saltmarsh-grass <i>Puccinellia fasciculata</i>;</p> <p>Slender hare's-ear <i>Bupleurum tenuissimum</i>;</p> <p>Sea clover <i>Trifolium squamosum</i>;</p> <p>Saltmarsh goose-foot <i>Chenopodium chenopodioides</i>;</p> <p>Golden samphire <i>Inula crithmoides</i>;</p> <p>Perennial glasswort <i>Sarcocornia perennis</i>; and</p> <p>One-flowered glasswort <i>Salicornia pusilla</i>.</p> <p>A total of at least twelve wetland British Red Data Book species have been recorded on the site:</p> <p>A ground beetle <i>Polistichus connexus</i>;</p> <p>A fly <i>Cephalops perspicuous</i>;</p> <p>A dancefly <i>Poecilobothrus ducalis</i>;</p> <p>A fly <i>Anagnota collini</i>;</p> <p>A weevil <i>Baris scolopacea</i>;</p>

	<p>Ruddy turnstone <i>Arenaria interpres</i> - 0.9% of the population in Great Britain;</p> <p>Dark-bellied brent goose <i>Branta bernicla bernicla</i> - 1.1% of the population in Great Britain;</p> <p>Dunlin <i>Calidris alpina alpina</i> - 1.9% of the population in Great Britain;</p> <p>Red knot <i>Calidris canutus</i> - 0.2% of the population in Great Britain;</p> <p>Common ringed plover <i>Charadrius hiaticula</i> - 1.6% of the population in Great Britain;</p> <p>Eurasian oystercatcher <i>Haematopus ostralegus</i> - 1% of the population in Great Britain;</p> <p>Black-tailed godwit <i>Limosa limosa islandica</i> - 12.9% of the population in Great Britain;</p> <p>Eurasian curlew <i>Numenius arquata</i> - 1.7% of the population in Great Britain;</p> <p>Grey plover <i>Pluvialis squatarola</i> - 2% of the population in Great Britain;</p> <p>Common shelduck <i>Tadorna tadorna</i> - 1.5% of the population in Great Britain;</p> <p>Common greenshank <i>Tringa nebularia</i> - 2.6% of the population in Great Britain; and</p> <p>Common redshank <i>Tringa totanus</i> - 2.1% of the population in Great Britain.</p> <p>An internationally important assemblage of birds (Article 4.2). Over winter, the area regularly supports 65496 waterfowl.</p>	<p>A water beetle <i>Berosus spinosus</i>;</p> <p>A beetle <i>Malachius vulneratus</i>;</p> <p>A rove beetle <i>Philonthus punctus</i>;</p> <p>The ground lackey moth <i>Malacosoma castrensis</i>;</p> <p>A horsefly <i>Atylotus latistriatus</i>;</p> <p>A fly <i>Campsicnemus magius</i>;</p> <p>A soldier beetle <i>Cantharis fusca</i>; and</p> <p>A crane fly <i>Limonia danica</i>.</p> <p>A significant number of non-wetland British Red Data Book species also occur.</p> <p>Assemblages of international importance (Ramsar criterion 5):</p> <p>Over winter the area supports 47637 waterfowl</p> <p>Species/populations occurring at levels of international importance (Ramsar criterion 6). Over spring/autumn the area supports:</p> <p>Grey plover <i>Pluvialis squatarola</i> - 1.2% of the population in Great Britain; and</p> <p>Common redshank <i>Tringa tetanus</i> - 1.4% of the population in Great Britain.</p> <p>Over winter the area supports:</p> <p>Dark-bellied brent goose <i>Branta bernicla bernicla</i> - 1.1% of the population in Great Britain;</p> <p>Common shelduck <i>Tadorna tadorna</i> - 3.3% of the population in Great Britain;</p> <p>Northern pintail <i>Anas acuta</i> - 1.8% of the population in Great Britain;</p> <p>Ringed plover <i>Charadrius hiaticula</i> - 1.6% of the population in Great Britain;</p>
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		<p>Red knot <i>Calidris canutus</i> - 1% of the population in Great Britain; and</p> <p>Dunlin <i>Calidris alpina alpina</i> - 1.4% of the population in Great Britain.</p> <p>Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in spring/autumn:</p> <p>Black-tailed godwit <i>Limosa limosa islandica</i> - 2% of the population in Great Britain.</p>
Pressures and Threats	<p>Negative:</p> <p>Invasive non-native species</p> <p>Changes in abiotic and biotic conditions</p> <p>Outdoor sports and leisure activities, recreational activities</p> <p>Positive:</p> <p>Improved access to site</p> <p>Modification of cultivation practices</p> <p>Annual and perennial non-timber crops</p>	<p>Water diversion for irrigation/domestic/industrial use</p> <p>Dredging - Continued maintenance dredging for port facilities and jetties may be contributing to adverse effects, e.g. through removal of sediment from the estuary. Maintenance dredging is subject to regulation and will be assessed under a protocol currently being trialled by Defra.</p> <p>Erosion - The North Kent Coastal Habitat Management Plan (CHaMP) has been produced (Anon. 2002). The Environment Agency is to produce a Shoreline Management Plan/Flood Defence Strategy for Medway and Swale [published in 2010] and decisions on future flood risk management will need to take into account the effects on features within the designated sites. Large-scale trials of mudflat recharge to address erosion.</p> <p>Eutrophication - The Medway shows symptoms of eutrophication, particularly growth of green algae which covers large areas of the intertidal mudflats in late summer. Studies by the Environment Agency also indicate that the waters in the Medway are hyper-nutrient for nitrogen and phosphorus. Water quality and sources of nutrient inputs are subject to further investigation by the Environment Agency as part of the Agency's review of consents under the Habitats Regulations. Stage 3 of the Review of Consents (appropriate assessment) is scheduled for completion by March 2006, at which point any</p>

		<p>consented discharges having an adverse effect on site integrity will be identified.</p> <p>Recreational/tourism (unspecified)</p> <p>Transport infrastructure development - Construction of new road bridge on to Isle of Sheppey, resulting in loss of some designated habitat and disturbance during construction. Scheme was assessed under Habitats Regulations and compensatory habitat provided (outside current designated site).</p>
Conservation Objectives	<p>Ensure that, subject to natural change, 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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The populations of qualifying features; and,</p> <p>The distribution of qualifying features within the site.</p>	
Condition Summary for SSSI Units	<p>Medway Estuary and Marshes SSSI:</p> <p>53.72% unfavourable recovering</p> <p>0.24% unfavourable no change</p> <p>45.56% unfavourable declining</p> <p>0.47% destroyed</p>	
Nitrogen Critical Loads CLmin-CLmax (kg N/ha/yr)	<p>Supralittoral sediment (coastal stable dune grasslands (acidic)): 8 – 10</p> <p>Supralittoral sediment (coastal stable dune grasslands (calcareous)): 10 – 15</p>	

	<p>Supralittoral sediment (shifting coastal dunes): 10 – 20</p> <p>Standing open water and canals (permanent dystrophic lakes, ponds and pools): 3 - 10</p> <p>Dwarf shrub heath (northern wet heath): 10 - 20</p> <p>Fen, marsh and swamp (rich fens): 15 - 30</p> <p>Littoral sediment (pioneer, low-mid, mid-upper saltmarshes: 20 - 30</p>	
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Site Name	Thames Estuary and Marshes	
Designation(s)	SPA	Ramsar
Site Area	4802.47 ha	5588.59 ha
Qualifying Features	<p>Over winter the area regularly supports (Article 4.1):</p> <p>Hen harrier <i>Circus cyaneus</i> - 1% of the population in Great Britain; and</p> <p>Pied avocet <i>Recurvirostra avosetta</i> – 28.3% of the population in Great Britain.</p> <p>Over winter the area regularly supports (Article 4.2):</p> <p>Dunlin <i>Calidris alpina alpina</i> – 2.1% of the population in Great Britain;</p> <p>Red knot <i>Calidris canutus</i> – 1.4% of the population in Great Britain;</p> <p>Black-tailed godwit <i>Limosa limosa islandica</i> – 2.4% of the population in Great Britain;</p> <p>Grey plover <i>Pluvialis squatarola</i> – 1.7% of the population in Great Britain; and</p> <p>Common redshank <i>Tringa totanus</i> - 2.2% of the population in Great Britain.</p> <p>On passage the area regularly supports (Article 4.2):</p> <p>Common ringed plover <i>Charadrius hiaticula</i> – 2.6% of the population in Great Britain.</p> <p>An internationally important assemblage of birds (Article 4.2). Over winter, the area regularly supports 75019 waterfowl.</p>	<p>The site supports a number of species of rare plants and animals (Ramsar 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.</p> <p>The site supports a winter waterfowl assemblage of international importance, with peak counts at 45,118 (Ramsar criterion 5).</p> <p>Species/populations occurring at levels of international importance (Ramsar criterion 6). Over spring/autumn the area supports:</p> <p>Ringed plover <i>Charadrius hiaticula</i> - 1.8% of the population in Great Britain; and</p> <p>Black-tailed godwit <i>Limosa limosa islandica</i> – 4.6% of the population in Great Britain.</p> <p>Over winter the area supports:</p> <p>Red knot <i>Calidris canutus</i> – 1.6% of the population in Great Britain;</p> <p>Dunlin <i>Calidris alpina alpina</i> - 1.1% of the population in Great Britain;</p> <p>Grey plover <i>Pluvialis squatarola</i> – 3.1% of the population in Great Britain; and</p> <p>Common redshank <i>Tringa tetanus</i> - 1% of the population in Great Britain.</p>
Pressures and Threats	<p>Negative:</p> <p>Changes in abiotic and biotic conditions</p> <p>Invasive non-native species</p> <p>Outdoor sports and leisure activities, recreational activities</p>	<p>Dredging</p> <p>Erosion - The North Kent CHaMP has been produced. The Environment Agency is producing a Flood Defence Strategy for the Thames (Thames 2100) [published in 2012] and decisions on future flood risk management will need to take into account the effects on features within the designated sites. Studies of sediment transport and</p>

	<p>Positive:</p> <p>Modification of cultivation practices</p> <p>Interpretative centres</p> <p>Improved access to site</p> <p>Grazing</p> <p>Annual and perennial non-timber crops</p>	<p>hydrodynamics within Thames estuary. Investigation of beneficial use of dredgings for mudflat recharge and creation of compensatory habitat.</p> <p>Eutrophication - Studies by the Environment Agency indicate that the waters in the Thames estuary are hyper-nutriented for nitrogen and phosphorus. Water quality and sources of nutrient inputs are subject to further investigation by the Environment Agency as part of the Agency's review of consents under the Habitats Regulations. Stage 3 of the Review of Consents (appropriate assessment) is scheduled for completion by March 2006, at which point any consented discharges having an adverse effect on site integrity will be identified.</p> <p>General disturbance from human activities</p>
Conservation Objectives	<p>Ensure that, subject to natural change, 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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The populations of qualifying features; and</p> <p>The distribution of qualifying features within the site.</p>	
Condition Summary for SSSI Units	<p>Mucking Flats and Marshes SSSI:</p> <p>94.13% favourable</p> <p>5.87% unfavourable recovering</p> <p>South Thames Estuary and Marshes SSSI:</p> <p>95.28% favourable</p> <p>2.35% unfavourable recovering</p>	

	0.59% unfavourable no change 1.79% unfavourable declining.	
Nitrogen Critical Loads CL_{min}-CL_{max} (kg N/ha/yr)	Supralittoral sediment (coastal stable due grasslands acidic): 8 – 10 Supralittoral sediment (shifting coastal dune): 10 - 20 Supralittoral sediment (coastal stable dune grasslands calcareous): 10 - 15 dwarf shrub heath (northern wet heath): 10 - 20 Fen, marsh and swamp (rich fens): 15 - 30 littoral sediment (pioneer, low-mid, mid-upper saltmarshes): 20 - 30	

Site Name	North Downs Woodlands
Designation(s)	SAC
Site Area	288.58 ha
Qualifying Features	Annex I habitats supported in the area: Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) (important orchid sites); <i>Asperulo-Fagetum</i> beech forests; and Yew <i>Taxus baccata</i> woods.
Pressures and Threats	Negative: Invasive non-native species Air pollution, air-borne pollutants Outdoor sports and leisure activities, recreational activities Forest and plantation management and use Positive: Grazing Modification of cultivation practices Forest and plantation management and use
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring: The extent and distribution of the qualifying natural habitats; The structure and function (including typical species) of the qualifying natural habitats; and The supporting processes on which the qualifying natural habitats rely.
Condition Summary for SSSI Units	Halling to Trottisccliffe Escarpment SSSI: 82.58% favourable 14.11% unfavourable recovering 3.3% unfavourable no change

	<p>Wouldham to Detling Escarpment SSSI:</p> <p>61.58% favourable</p> <p>38.42% unfavourable recovering</p>
<p>Nitrogen Critical Loads CL_{min}-CL_{max} (kg N/ha/yr)</p>	<p>Coniferous woodland: 5 – 15</p> <p><i>Fagus</i> woodland: 10 – 20</p> <p>Sub-atlantic semi-dry calcareous grassland: 15 - 25</p>

Site Name	Peter's Pit
Designation(s)	SAC
Site Area	287.58 ha
Qualifying Features	The area is considered to be one of the best in the UK for great crested newt <i>Triturus cristatus</i> .
Pressures and Threats	None identified
Conservation Objectives	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of qualifying species;</p> <p>The structure and function of the habitats of qualifying species;</p> <p>The supporting processes on which the habitats of qualifying species rely;</p> <p>The populations of qualifying species; and</p> <p>The distribution of qualifying species within the site.</p>
Condition Summary for SSSI Units	<p>Peter's Pit SSSI:</p> <p>100% favourable</p>
Nitrogen Critical Loads CLmin-CLmax (kg N/ha/yr)	Permanent dystrophic lakes, ponds and pools: 3 - 10

Site Name	Queendown Warren SAC
Designation(s)	SAC
Site Area	14.28 ha
Qualifying Features	Annex I habitats supported in the area: Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) (important orchid sites); and Dry grasslands and scrublands on chalk or limestone (important orchid sites).
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.
Pressures and Threats	Negative: Air pollution, air-borne pollutants Changes in biotic conditions Other ecosystem modifications Positive: Modification of cultivation practices
Condition Summary for SSSI Units	Queendown Warren SSSI: 100% favourable

Site name	The Swale	
Designation(s)	SPA	Ramsar
Site Area	6509.88 ha	6514.71 ha
Qualifying Features	<p>Over winter the area regularly supports (Article 4.2):</p> <p>Dunlin <i>Calidris alpina alpina</i> – 2.3% of the population in Great Britain;</p> <p>Dark-bellied brent goose <i>Branta bernicla bernicla</i> – 0.7% of the population in Great Britain; and</p> <p>Common redshank <i>Tringa totanus</i> – 0.9% of the population in Great Britain.</p> <p>An internationally important assemblage of birds (Article 4.2). Over winter the area regularly supports 65588 waterfowl.</p>	<p>The site supports nationally scarce plants and at least seven British Red Data Book invertebrates (Ramsar criterion 2).</p> <p>The site supports a winter waterfowl assemblage of international importance, with peak counts at 77,501 (Ramsar criterion 5).</p> <p>Species/populations occurring at levels of international importance (Ramsar criterion 6). Over spring/autumn the area supports:</p> <p>Common redshank <i>Tringa tetanus</i> – 1.4% of the population in Great Britain.</p> <p>Over winter the area supports:</p> <p>Grey plover <i>Pluvialis squatarola</i> – 3.9% of the population in Great Britain; and</p> <p>Dark-bellied brent goose <i>Branta bernicla bernicla</i> - 1.6% of the population in Great Britain.</p> <p>Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in spring/autumn:</p> <p>Ringed plover <i>Charadrius hiaticula</i> - 1.2% of the population in Great Britain;</p> <p>Species with peak counts in winter:</p> <p>Eurasian wigeon <i>Anas penelope</i> - 1% of the population in Great Britain;</p> <p>Northern pintail <i>Anas acuta</i> - 1.2% of the population in Great Britain;</p> <p>Northern shoveler <i>Anas clypeata</i> - 1.2% of the population in Great Britain; and</p>

		Black-tailed godwit <i>Limosa limosa islandica</i> - 4.2% of the population in Great Britain.
Pressures and Threats	<p>Negative:</p> <p>Changes in abiotic and biotic conditions</p> <p>Outdoor sports and leisure activities, recreational activities</p> <p>Fishing and harvesting aquatic resources</p> <p>Invasive non-native species</p> <p>Positive:</p> <p>Annual and perennial non-timber crops</p> <p>Modification of cultivation practices</p> <p>Improved access to site</p> <p>Grazing</p>	Erosion
Conservation Objectives	<p>Ensure that, subject to natural change, 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:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The populations of qualifying features; and</p> <p>The distribution of qualifying features within the site.</p>	
Condition Summary for SSSI Units	<p>The Swale SSSI:</p> <p>97.83% favourable</p> <p>2.17% unfavourable no change</p>	

Appendix D

Screening

D1 Screening of Policies

Title	Policy	Rationale	Assessment Category	Screened In/Out
Policy DS1: Sustainable Development	<p>The purpose of planning is to achieve sustainable development. When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.</p> <p>Planning applications that are in conformity with the Medway Local Plan (and where applicable, with policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application, or relevant policies are out of date, the council will grant permission, unless material considerations indicate otherwise, and considering whether:</p> <ul style="list-style-type: none"> Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or Specific policies in that framework indicate that development should be restricted. 	The policy describes the council's approach when considering the sustainability of development proposals but does not lead to development itself.	B	Out
Policy DS2: Spatial Development Strategy	<p>The council will seek to meet the development needs for homes, employment and retail land, infrastructure and services, as determined by the evidence base set out in the Medway Local Plan, whilst respecting the need to conserve and enhance the natural and built environment.</p> <p>The development strategy for Medway prioritises regeneration, making the best use of underused and previously developed land and directing investment to urban waterfront and centre opportunity areas. The council will encourage sustainable development in appropriate urban regeneration sites to deliver housing, employment, retail and community uses, establishing a quality and accessible public realm, including the extension of a riverside walk. Chatham will provide the</p>	Site allocations at Hoo St Werburgh associated with the proposed rural town and at Lower Rainham, High Halstow, Allhallows, Grain and Lower Stoke have potential to provide supporting habitat to the north Kent marshes	I	In (alone)

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>focus for new retail and community facilities. Appropriate opportunities to capitalise upon the learning quarter at Chatham Maritime will be positively considered.</p> <p>Outside of the regeneration areas, the council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting and supported by significant infrastructure investments. The development will be in accordance with a masterplan, to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to a range of services and infrastructure.</p> <p>The council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.</p> <p>Strategic green infrastructure zones throughout urban and rural Medway will promote a natural capital approach, and secure benefits for nature and people and provide separation of settlements.</p>	<p>European sites. There are likely significant effects associated with development in these locations, associated with habitat loss and fragmentation, disturbance, reduced water quality and levels and reduced air quality. Extension of a riverside walk also has a potential to increase recreational pressure within the SPA/Ramsar sites depending on its location.</p>		
Policy H1: Housing Delivery	<p>The council will determine a housing target for the Medway Local Plan, responding to the latest relevant information, in preparing its draft Local Plan.</p> <p>The council will seek to provide a supply of land to meet the needs for market and affordable housing that responds to the objectively assessed need for housing, and meets the principles of sustainable development.</p> <p>Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.</p> <p>Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.</p>	<p>Delivering housing targets in line with the objectively assessed need for housing has a potential to lead to significant effects on European sites associated with disturbance, habitat loss, reduced water quality and levels and reduced air quality. In particular, site</p>	I	In (alone)

Title	Policy	Rationale	Assessment Category	Screened In/Out
	Development of a strategic allocation for a rural town on the Hoo Peninsula will be in accordance with the council's development framework for Hoo.	allocations on the Hoo Peninsula associated with the proposed rural town have potential to provide supporting habitat to the north Kent marshes European sites.		
Policy H2: Housing Mix	<p>The council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population. Residential development will be permitted to encourage a sustainable mix of market housing to include an appropriate range of house types and size to address local requirements.</p> <p>The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.</p> <p>Accommodation requirement as detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform which house sizes and mix should be delivered in urban and rural areas to meet the objectively assessed needs of the area.</p> <p>In relation to affordable housing, the council will expect the submission of details of how this information has been used to justify the proposed mix.</p> <p>Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council's housing register and discuss affordable housing requirements with the council's Housing Strategy team at the pre-submission stage of the planning process.</p> <p>Large development schemes must demonstrate that sufficient consideration has been given to custom and self-build plots as part of housing mix.</p> <p>The council will work with partners to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people.</p>	The policy provides criteria for testing the acceptability of housing mix proposals, but does not provide specific details concerning the amount or locations of housing.	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	Gypsy, Traveller and Travelling Showpeople accommodation requirements will form part of the borough's need for housing.			
Policy H3: Affordable Housing	<p>On housing and mixed use development sites of 15 or more residential units the council will require the delivery of affordable housing.</p> <p>The council will apply the following requirements for affordable housing provision:</p> <ul style="list-style-type: none"> in rural Medway 30% of all residential units for developments of 15 or more dwellings in urban Medway 25% of all residential units for developments of 15 or more dwellings <p>There will be a strong presumption in favour of the affordable homes being fully integrated within the proposed development. However the council may consider off site provision, for instance to enable other policy objectives to be met, subject to an equivalent level of developer contribution being provided.</p> <p>Offsite provision could be either by way of the developer directly providing affordable dwellings on an alternative site, or by making a financial contribution which would enable provision either through new build on an alternative site.</p>	The policy provides criteria for testing the acceptability of proposals for affordable housing provision.	B	Out
Policy H4: Supported Housing, Nursing Homes and Older Persons Accommodation	<p>The development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:</p> <ul style="list-style-type: none"> Meets a proven need for that particular type of accommodation. Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs. Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence. 	The policy outlines general criteria for testing the acceptability of proposals for specialised residential housing, but does not specify the location or quantum of development.	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area. <p>Loss of specialist housing will be permitted only where it is demonstrated that there is no need for the form of accommodation.</p>			
Policy H5: Student Accommodation	<p>This council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.</p> <p>Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need. The council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, and does not have a negative impact on the core functions of the town centres.</p> <p>These locations must be well served by public transport and accessible to a wide range of town centre, leisure and community uses.</p> <p>Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land or leisure or community space.</p> <p>Student housing will be required to provide a high quality living environment and include a range of unit sizes and layouts with and without shared facilities to meet requirements of the educational institutions they serve.</p>	The policy outlines general criteria for testing the acceptability of proposals for student accommodation focussed in town centre locations.	B	Out
Policy H6: Mobile Home Parks	<p>Proposals for mobile or park home developments will be given the same consideration as other dwellings and will be subject to the same compliance with planning policy in assessing impact and sustainability.</p> <p>The council seeks to protect existing parks from competing uses, but restrict their expansion outside designated areas. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area particularly those near areas of sensitive environmental interests.</p>	The policy outlines general criteria for testing the acceptability of the development of mobile home parks and development that may result in the loss of mobile homes.	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home park, or a reduction in the area available for their use will not be permitted.</p> <p>The council will set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites.</p> <p>Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.</p> <p>Any proposals for updates or intensification must have careful consideration for the colour, massing and materials used, incorporate appropriate landscaping and have no adverse impact on the character of the locality or amenity of nearby residents.</p>			
Policy H7: Houseboats	<p>The council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim:</p> <ul style="list-style-type: none"> • To protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place. • To specify criteria under which any further growth of houseboats will be allowed in order to minimise impact. • To seek the removal and disposal of any vessel so moored if a boat sinks, or becomes unfit for habitation, derelict, or is otherwise abandoned. 	Houseboats are located within SPA/Ramsar sites, the growth of which could increase disturbance or water pollution through waste disposal. This policy indicates that further growth may be permitted, but does not provide the criteria under which the growth of houseboats will be allowed. It is therefore not possible to rule out likely significant effects on European sites.	I	In (alone)
Policy H8: Houses of	The council seeks to avoid detrimental over concentrations of HMOs. Where planning applications for houses in multiple occupation (HMOs) are not already	The policy outlines general criteria for testing the acceptability	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
multiple occupation	<p>covered by permitted development rights, they will be favourably considered where they:</p> <ul style="list-style-type: none"> Do not adversely affect the character and amenity of the area, or the supply of family housing. Do not contribute to the over concentration of HMOs in a particular area. Do not contribute to the generation of excessive parking demands or traffic in an area. Make appropriate provision for the storage of waste. 	of proposals with houses in multiple occupation.		
Policy H9: Self-build and Custom Housebuilding	<p>The council will support self-build or custom build home development in sustainable and suitable locations.</p> <p>To identify and provide for people who wish to build their own home, the council will maintain a register of interested parties and report the headline data annually on the council website after the end of each base period.</p> <p><i>All new self-build/custom housebuilding applications</i></p> <ul style="list-style-type: none"> Applicants will need to have regard to the local landscape and guidance from other relevant Local Plan policies in the same way that other types of residential applications do; this will ensure all types of new development are of high quality. If the number of self build plots on a single site exceeds 10, then a design code framework should be agreed with the council prior to the submission of individual planning applications. This will ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality. In accordance with Government guidance on Self-Build and Custom Housebuilding, the plots must be serviced (have access to a public highway and connections for electricity, water and waste water) or, in the opinion of a relevant authority, can be provided with access to those things 	The policy outlines general criteria for testing the acceptability of self-build and custom housebuilding applications.	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>within the duration of a development permission granted in relation to that land.</p> <ul style="list-style-type: none"> Where a land owner has a suitable small site that they wish to obtain speculative outline residential permission for, they are encouraged to consider the plot for self-build or custom housebuilding, depending on the local demand. <p><i>Expanding/intensifying existing residential permissions</i></p> <p>Where there is an existing permission and the developer approaches the council seeking to expand/intensify the development, the developer should demonstrate that they have considered some/all of the additional plots to be provided as serviced self/custom build plots, where there is identified demand.</p> <p><i>Neighbourhood Plans</i></p> <p>The council supports the consideration of self-build and custom housebuilding in the preparation of Neighbourhood Plans. The Neighbourhood Plan group may also work with the council to establish a locally derived design code.</p> <p><i>Council owned land and Regeneration</i></p> <p>The council will consider opportunities for self-build housing in disposal of Council land and in promoting regeneration schemes.</p>			
<p>Policy H10: Gypsy, Traveller and Travelling Showpersons</p>	<p><i>Safeguarding Existing Sites</i></p> <p>Existing permanent authorised gypsy and traveller sites and sites for travelling showpeople will be retained, unless:</p> <ul style="list-style-type: none"> There is a surplus of available accommodation over and above the required five year supply of sites, or, The site will be replaced by a site of similar proportions in an appropriate location which complies with the criteria listed below for new sites, or, A site has been granted a personalised permission restricting residency to a named occupier or family. 	<p>The policy prohibits proposals for new sites within European sites, but does not take supporting habitat into account, or development that could cause disturbance or other indirect impacts. As such, it is not possible to</p>	I	In

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p><i>New Sites</i></p> <p>Proposals for new gypsy, traveller and travelling showperson sites (temporary or permanent) will be permitted, in accordance with the council's planning policies if they meet the following criteria:</p> <ul style="list-style-type: none"> • Need – the council is satisfied that there is a clear need for the site and the proposal cannot be met on existing available sites or an allocated site • Location – within an accessible walking distance to local facilities for education, healthcare, and convenience retailing. <p>Not located in the Green Belt, flood risk zones 2 & 3, areas covered by landscape or environmental designations (AONBs, SSSI, Ramsar, SPA, SACs, Ancient Woodland or local nature reserves), protected open spaces or protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas), or the best and most versatile agricultural land, of Grades 1, 2 or 3a).</p> <ul style="list-style-type: none"> • Scale – a site should respect its location and surrounding environment and be embedded within it and not intrude onto the landscape. The council will require a landscape strategy as part of the application to confirm the details of this. <p>Pitches and plots should be of a sufficient size and, on sites for Travelling Showpeople have space for adequate storage.</p> <ul style="list-style-type: none"> • Access – there is safe and convenient pedestrian and vehicular access to the public highway, with adequate space on site for vehicle turning and parking. 	rule out likely significant effects.		
Policy E1: Economic Development	<p>The council will seek to boost Medway's economic performance, securing a range of jobs for its workforce. The council will work positively with the local business community and major public sector employers, the Universities at Medway and further education providers, inward investors, strategic partnerships and neighbouring authorities to support sustainable economic growth and job creation.</p> <p>The council will make provision for the scale, range, quality and locational requirements of employment land identified in the Employment Land Needs</p>	The policy makes provision for the supply of 369,954 m ² of employment floorspace to be delivered up to 2035 identified in the Employment Land Needs	I	In (alone)

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>Assessment, 2015 in Medway. This will involve the safeguarding of sites, identification of redevelopment and investment opportunities, and allocations for new sites.</p> <p>The plan will seek to increase the productivity of Medway's economy, as measured through GVA, through support for higher value employment. This will include the designation of specific employment sites as suitable for higher value employment. All planning applications for employment uses will be assessed for their GVA contributions and whether the proposed use is best aligned to the site characteristics and locational offer. The council and its partners will promote growth of employment sectors that have the best potential for higher value jobs.</p> <p>The council will support actions to:</p> <ul style="list-style-type: none"> • Consolidate economic benefits from the regeneration programme in Medway, specifically seeking to strengthen the role of the town centres in providing wider job opportunities; • Raise skills levels and provide apprenticeship and local labour opportunities; • Realise opportunities for raising higher value employment through supporting the development of the Universities at Medway and the wider learning quarter, and linking to growth in the wider economy; • Seek to accrue benefits for Medway's economy from strategic developments of infrastructure, housing and employment sites outside of the borough; • Explore the extension of the successful Medway Innovation Centre model to provide additional serviced employment space for businesses; • Seek the installation and upgrade of high speed broadband services in employment sites; • Promote the diversification of Medway's economic base; 	<p>Assessment. The strategic site at Kingsnorth is located partially within and adjacent to Medway Estuary & Marshes SPA and Ramsar site and includes an additional parcel of land that was not allocated in the 2003 Local Plan (Land north of Kingsnorth Industrial Estate). The site at Grain is located adjacent to Medway Estuary & Marshes SPA and Ramsar site and close to Thames Estuary & Marshes SPA and Ramsar site, although the boundaries of this allocation align with the 2003 Local Plan. Given the extent and location of employment provision, there are likely significant effects associated with the loss of designated and supporting habitats, disturbance associated</p>		

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> Secure sustainable employment uses for the strategic sites at Grain and Kingsnorth, achieving value from the specific location offer and the access to water and rail for freight movements. 	with lighting, noise and recreation and reduced water quality and levels.		
Policy E2: Rural Economy	<p>The council will support the land based sector in Medway, through seeking to direct development to land of lesser agricultural land [value], where feasible, and promoting the sustainable development and diversification of farming and other land based rural businesses, where the proposals can demonstrate positive benefits and do not conflict with other policies in the Local Plan. The council will define countryside areas outside of the urban and village settlement boundaries, where the land based economy will be supported where it does not conflict with requirements to conserve and enhance the environment.</p> <p>The council will support the growth of rural businesses in well-designed development in appropriate locations that respect the character of the countryside and environmental features. Sustainable rural tourism and leisure activities that are in keeping with their rural setting will be supported.</p> <p>The council will seek the retention of key rural services and facilities to promote sustainable villages, providing for the needs of rural residents.</p>	The policy provides a general aspiration for the development of the rural economy, providing that this does not conflict with other policies or requirements to conserve and enhance the environment. This provides acceptable mitigation for impacts on European sites.	A	Out
Policy E3: Tourism	<p>The council will positively promote sustainable tourism development that can make a positive contribution to Medway's economy and cultural life. Appropriate proposals for the development of tourism facilities and visitor accommodation will be supported where they meet the principles of sustainable development.</p> <p>Tourism developments that can contribute positively to the regeneration of Medway, consistent with the council's vision, and extend the cultural offer will be considered favourably. Opportunities for development to enhance the vibrancy and vitality of town centres will be welcomed.</p> <p>The enhancement of cultural assets and visitor facilities will be supported, where they respect the integrity of the surrounding area, particularly those assets associated with the local historic environment.</p>	The policy provides general criteria testing the acceptability of proposals that promote tourism. The promotion of rural and marine based tourism could impact European sites, potentially including increased disturbance, habitat loss, reduced water quality and levels and reduced air quality.	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>Opportunities to support the development of rural and marine based tourism will be welcomed, where they can demonstrate that negative impacts on the environment can be avoided.</p> <p>Proposals for tourism facilities will be assessed against the principles below:</p> <ul style="list-style-type: none"> • Identified need for creation, expansion or improvement of tourism facilities; • The proposal is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment • Maximises opportunities for sustainable travel 	However, the policy provides adequate mitigation for such effects.		
Policy E4: Visitor accommodation	<p>The retention and provision of visitor accommodation is encouraged in accordance with the principles set out below:</p> <ul style="list-style-type: none"> • Where it meets a proven need, particularly those sectors of the market where evidence indicates unmet demand, such as a high quality boutique hotel in Rochester, and quality rural self-catering accommodation; • Development enhances the quality and offer of existing visitor accommodation and its setting; • Where the proposal contributes to the vibrancy, vitality and viability of town centres and the sustainability of wider settlements; • Where the proposal avoids negative impacts on the environment, is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment, avoids siting in areas of high flood risk and intrusion into the landscapes of open countryside; • Maximises opportunities for sustainable travel in accessible locations and minimises traffic generation. 	The policy provides a general aspiration for the retention and provision of visitor accommodation.	A	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
Policy RTC1: Retail hierarchy	<p>The function of centres as multi-purpose destinations and the main locations for retail, community, leisure and employment will continue to be supported in relation to their individual role and scale. Chatham is the primary centre at the top of the hierarchy and will be the focus for the majority of comparison retail to meet the strategic needs for the authority and maintain its role in the hierarchy.</p> <p>Medway's hierarchy of centres is:</p> <ol style="list-style-type: none"> I. Principal Town Centre: Chatham is the main location for comparison retail, community uses, leisure and tourism (in support of local heritage assets and cultural focus). II. District Centres: The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres: Strood, Gillingham, Rainham, Rochester, Hempstead Valley III. Local Centres: The authority seeks to maintain the sustainably accessed local top up shopping offer and to satisfy the day-to day needs of the local population <p>New local centres or shopping parades compliant with the council's retail policies may be required in the following locations depending on the defined development strategy and proposals maps in the Local Plan, the scale of the proposal.</p> <ul style="list-style-type: none"> • Hoo St Werburgh rural town • Rainham East • Capstone <p>Proposals will need to be supported by a robust justification taking into account the existing provision, character and scale of the area and the demographics.</p>	<p>The policy describes general criteria for testing the acceptability of proposals for retail provision, focussed in Chatham and then in other existing and proposed centres. Specific locations are provided, but significant effects are unlikely given that development is focussed in town centres that are not located near to European sites.</p>	A	Out
Policy RTC2: Sequential Assessment	<p>Main town centre uses are directed to Medway's centres as identified in policy RTC1.</p> <p>Proposals to locate or expand main town centre uses outside of defined centres, and where not in accordance with any part of the retail and main town centre uses strategy in the development plan, are required to demonstrate through a sequential</p>	<p>It is not possible to rule out likely significant effects on European sites for main town centre uses on the edge of or</p>	I	In (alone)

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>assessment, within an agreed and defined catchment area, that there are no sequentially preferable sites available in accordance with the following sequence:</p> <ol style="list-style-type: none"> I. Chatham II. Strood, Gillingham, Rainham, Rochester III. Hempstead Valley Shopping Centre IV. Local centre or edge of centre, whichever is better connected and able to support 1, 2 or 3 listed above V. Out of centre <p>When considering sequentially preferable edge and out of centre sites, following demonstration of the unavailability of more central sites, preference will be given to edge and out of centre sites that are accessible and well connected to town centres respectively, i.e. consideration of edge of centre sites first.</p> <p>The catchment area must be defined through discussions with the authority at the earliest opportunity and is dependent on the scale and type of the proposal and its ability to draw trade.</p> <p>Large scale leisure proposals must be accessed by sustainable means, not have a negative impact on traffic and provide ease of access.</p> <p>Proposals for ancillary development are required to be compliant with the policy set out above unless it can be:</p> <ul style="list-style-type: none"> • Justified as ancillary and necessary for the business operation; • the type of use and scale of the proposal is secondary to the predominant/main use; • demonstrated that there are dependencies between the proposal and the predominant/main use. Consideration will be given to the location of the proposal in relation to the predominant/main use; • it may be necessary to manage the ancillary use through condition to maintain its secondary nature 	<p>out of centre, given that the locations are not defined and environmental impacts have not been taken into account.</p>		

Title	Policy	Rationale	Assessment Category	Screened In/Out
	The scale of the proposal may also require an impact assessment and therefore requires compliance with policy RP3 ³³ where it meets the criteria.			
Policy RP3³³: Impact Assessments	<p>Proposals that seek to locate or expand retail and other main town centre uses in edge or out of centre locations will be permitted where:</p> <ol style="list-style-type: none"> it is supported by an impact assessment where proposals for comparison, convenience retail, or commercial leisure⁴⁶ development exceeds a defined threshold set in the Local Plan; or other large scale leisure and office uses exceeds 2,500sqm. it is demonstrated that it would not have a significant adverse impact on: <ul style="list-style-type: none"> Impact on the strategy - development, retail and main town centre uses strategy Impact on vitality and viability of centres within the catchment of the proposal Impact on existing, planned or committed town centre investment Consideration is given to the cumulative impact of proposals considered relevant and to the health of centres Consideration is given to the local context and the vulnerability of the authority's centres Where appropriate development proposals may be conditioned to reduce the impact on centres where there is an impact but is not considered significantly adverse to justify refusal. 	It is not possible to rule out likely significant effects on European sites for edge and out of centre uses, given that the locations are not defined and environmental impacts have not been taken into account.	I	In (alone)
Policy RTC4: Frontages	Proposals within frontages of centres must be in accordance with the council's design policies and:	The policy sets out requirements for proposals within frontages of centres.	G	Out

⁴⁶ Restaurants and cafes considered important in supporting the evening economy.

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> provide an active frontage at ground floor level, which is accessible and attractive to pedestrians. The presence of a larger proportion of show window space is required. be of appropriate scale, format, design and character reflective of the facades above ground floor, the centre's role and function and the Council's ambitions as set out in RP1 and RP5 Protect and where possible enhance the public realm through well planned and coordinated planting, improvements to surfacing/paving and other environmental enhancements. Must demonstrate no harm to other neighbouring businesses, residential public and visual amenity through impacts such as noise, light, odour, late night activity, litter and general disturbance. 			
Policy RTC5: Role, Function and management of uses in centres – Frontage	<p>The council seeks to establish a robust, vital and viable retail core in support of competitive, sustainable and healthy centres compliant with its retail policies. A mix of uses is supported with due consideration of avoiding an overprovision or concentration of the same type of uses.</p> <p><i>Primary Frontage</i></p> <p>Proposals for non-A1 uses within the primary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy provided the provision of A3 uses do not result in an over concentration in Rochester District Centre.</p> <p>Where the proposal results in the loss of A1 premises, permission will be granted where:</p> <ol style="list-style-type: none"> it is consistent with the policy above. in all other cases the unit has remained vacant for at least 6 months and the applicant can demonstrate: <ul style="list-style-type: none"> reasonable attempts were made without success to let the premises for A1 use; 	<p>The policy describes the council's approach to establishing a retail core as part of town centres, and mix of uses for primary and secondary frontages.</p>	G	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> that the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy of the centre. <p>Greater efficiency in the use of upper floors will be supported and encouraged.</p> <p><i>Secondary Frontage</i></p> <p>Proposals for non-A1 uses within the secondary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy and where provision of A3 uses does not result in over provision in Rochester district centre.</p> <p>Where the proposal results in the proportion of A1 representation falling below the desirable threshold and/or results in the loss of A1, A3, D2, community and cultural uses, permission will be granted where:</p> <ul style="list-style-type: none"> reasonable attempts were made without success to let the premises for the last use the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy. 			
Policy RTC6: Temporary uses	<p>Proposals for a temporary use of vacant units within town and local centre frontages will be supported for a period of up to 6 months where compliant with the council's design and retail policies and:</p> <ul style="list-style-type: none"> where the unit has been vacant for at least 2 months; where the proposed use makes a contribution to the vitality and viability of the centre. <p>Erection of structures for the operation of the business must be easily removable</p> <p>Temporary permissions will only be renewed for a single additional period where:</p> <ul style="list-style-type: none"> The original temporary permission was granted for a period of less than 4 months Reasonable attempts were made to let the premises without success 	The policy identifies the council's approach to proposals for temporary use of vacant units within town and local centre.	G	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> The current temporary use can demonstrate benefit to the centre and success of business. 			
Policy RTC7: Supporting Sustainable and Healthy centres	<p>Development proposals will help to create healthy and sustainable places, recognising the cumulative effect individual units and specific uses can have on the success of places.</p> <p>The council will seek to manage the concentration and mix of specific premises to strengthen its centres and support healthier communities.</p>	The policy provides a general aspiration for creating healthy and sustainable places.	A	Out
Policy RTC8: Hempstead Valley District Centre	<p>Hempstead Valley is different to the other traditional centres with high streets. The council recognises that it provides for local needs and therefore supports the modernisation and growth of this where supportive of this local function.</p> <p>Further retail and leisure development, appropriate to the character and role of the centre will be supported, following a sequential or impact test, where it can be demonstrated that it does not undermine the viability of main town centres in Medway.</p>	The policy provides general criteria for testing the acceptability of retail and leisure development at Hempstead Valley, which not located near to European sites.	B	Out
Policy RTC9: Medway Valley Leisure Park	<p>Medway Valley Leisure Park is a family leisure destination that attracts visitors and residents in the area.</p> <p>The council's retail policy directs all leisure uses firstly to Medway's centres. Development proposals will be supported where enhancing current provision without requiring expansion beyond the designated boundary, subject to compliance with the council's retail policies:</p> <ol style="list-style-type: none"> satisfying that no sequentially preferable sites were found; <ul style="list-style-type: none"> that the impact assessment has been satisfied where triggered. 	The policy provides general criteria for testing the acceptability of retail and leisure development at Medway Valley Leisure Park, Strood, which not located near to European sites.	B	Out
Policy RTC10: Healthy sustainable communities	<p>The council will support the provision of services and facilities, in accessible locations, to support the day-to-day activities of residents in a sustainable manner. Considerations of sustainability will include the offer (balance of retail, community uses and services), and accessibility - the mode of travel and distance.</p>	The policy provides a general aspiration to support healthy sustainable communities.	A	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
Policy RTC11: Local Centres and shopping parades	<p>Uses within a defined local centre or smaller shopping parades must be appropriate to the scale, character and role of the centre or parade, be compliant with the council's retail policies and include the following uses to support the core function:</p> <ul style="list-style-type: none"> • Convenience retail offer to provide top up shopping • Community uses (such as hall, library, notice board) • Services (such as hairdressers, cash machines) • provide convenience for local communities (allowing various activities to be undertaken) <p>Proposals resulting in the loss of the core uses listed above will be permitted in local centres and shopping parades where in compliance with the council's retail policies:</p> <ul style="list-style-type: none"> • it is demonstrated that the loss is mitigated by similar uses of community value in close proximity; • it is demonstrated that the proposed use would make a positive contribution to the vitality and viability and balance of uses in the centre and is of appropriate scale and character; • the unit has remained vacant for at least 6 months and can be demonstrated that reasonable attempts have been made, without success, to let or sell the premises for a shop or community use. 	The policy is focussed on the provision of core retail uses within centres.	G	Out
Policy RTC12: Retail Parks	<p>Retail proposals will be permitted in defined retail parks (Strood Retail Park, Horsted Park, Gillingham Retail Park) appropriate to their character where the following criteria are satisfied:</p> <ul style="list-style-type: none"> • Provision of suitable access, parking or parking arrangements; • It is demonstrated that no locations in-centres are available where uses are typical of and more appropriate for a town centre location; 	The policy provides general criteria for testing the acceptability of retail and leisure development at Strood, Horsted and Gillingham Retail Parks, which are not located near to European sites.	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> It is demonstrated satisfaction of an impact assessment that there will be no impact on centres, with particular attention to vitality, viability, vibrancy and sustainability of the existing centres and their vulnerabilities No significant impact on the transport network and parking in the surrounding area Good public realm and linkage to the neighbouring centre is provided assisting in linked trips and increasing dwell time in the neighbouring centre. <p>An impact and sequential assessment for non-minor retail (above 2,500sqm) will be required to take account of the cumulative impact of recent significant proposals.</p> <p>Where appropriate the council will require:</p> <ul style="list-style-type: none"> conditions or legal agreements will be required to manage impact on centres, including a condition on the type and range of goods. Public realm works to facilitate better linkage with the centre. 			
Policy NE1: Sites of international importance for nature conservation	<p>The estuaries and marshes of the Thames, Medway and Swale are designated Special Protection Areas (SPAs) and Ramsar sites in recognition of their international importance as wetland habitats. There is a Special Area of Conservation in the North Downs woodland near north Halling. These sites require the highest level of protection from development that could damage the features of the designated areas. No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site, alone or in combination with other plans or projects, as it would not be in accordance with the Habitat Regulations 2010 (as amended) and the aims and objectives of this emerging Local Plan.</p> <p>The council will work in collaboration with local planning authorities in north Kent to contribute to the delivery of a strategic access management and monitoring scheme to address potential damage from population increases on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.</p>	The policy describes the council's approach to maintaining the integrity of European Sites.	E	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>Development within 6km of these areas designated as the Special Protection Areas and Ramsar sites that has the potential to generate additional visits to these coastal areas will be required to make a defined tariff contribution to a strategic package of measures agreed by the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) Project Board.</p> <p>The council will consider the potential for adverse impacts on the Special Areas of Conservation arising from development, either alone or in combination with other plans and projects. If the assessment shows that there is a potential for adverse impacts, steps will be taken to restrict or mitigate development.</p>			
Policy NE2: Conservation and Enhancement of the Natural Environment	<p>The council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy NE1, Medway includes Sites of Special Interest, Local Nature Reserves, Local Wildlife Sites and a Marine Conservation Zone.</p> <p>The council will promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.</p>	The policy describes the council's approach to promoting the conservation and enhancement of biodiversity in Medway.	D	Out
Policy NE3: Kent Downs Area of Outstanding Natural Beauty	<p>Development proposals in the Kent Downs AONB and in the setting of the downs will be required to contribute to the conservation and enhancement of the natural beauty of this designated landscape.</p> <p>Development must demonstrate that it has have regard to the Kent Downs Management Plan and associated policy guidance.</p>	The policy sets out how development in the Kent Downs AONB must contribute to its conservation and enhancement of its natural beauty.	D	Out
Policy NE4: Landscape	<p>The council attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, containing urban sprawl and separation of settlements.</p> <p>An updated Medway Landscape Character Assessment and Green Infrastructure Framework will provide a basis for determining the acceptability of development proposals and areas and features that need to be protected and enhanced.</p>	The policy sets out how development proposals will be required to demonstrate that they protect, strengthen and	D	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	Development proposals will be required to demonstrate that they protect, strengthen and connect features of local landscapes.	connect features of local landscapes.		
Policy NE5: Securing strong Green Infrastructure	<p>The council will protect the network of green infrastructure across rural and urban Medway. The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a Special Protection Area, Ramsar site and/or Special Area of Conservation. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland.</p> <p>The council will consider the need to protect the special features of Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves</p> <p>Wider components of the green infrastructure network will be protected in line with the analysis and strategy set out in the emerging Green Infrastructure Framework. This will include open space assets, landscape buffers and green infrastructure zones.</p> <p>New development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.</p> <p>The council will expect development proposals to demonstrate that they are designed to be resilient to, and can adapt to the future impacts of climate change, in strengthening ecological networks.</p> <p>The council will promote the extension of the green infrastructure network through setting criteria for the establishment and maintenance of Local Green Spaces.</p> <p>Opportunities will be sought to promote and enhance the public rights of way network, including footpaths, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside.</p>	The policy promotes improvements to the public rights of way network, including the extension of appropriate access along the riverside, which has a potential to increase recreational disturbance within the SPA/Ramsar sites.	I	In (alone)

Title	Policy	Rationale	Assessment Category	Screened In/Out
Policy NE6: Green Belt	<p>The council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.</p> <p>Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.</p> <p>The council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.</p>	The policy highlights the function of the Green Belt, and sets out the Council's approach to managing its continued function.	D	Out
Policy NE7: Flood and Water Management	<p>The Local Plan will seek to reduce flood risk, promote water efficiency measures, and protect and enhance water quality through the following mechanisms:</p> <p><i>Flood Risk Management</i></p> <ul style="list-style-type: none"> Ensuring that development has a positive or nil impact on flood risk management interests Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted. Where development benefits from an existing or proposed flood infrastructure, the development should contribute towards the capital costs and/or maintenance of these defences over the lifetime of the development. <p><i>Sustainable Urban Drainage</i></p> <p>Development should enable or replicate natural ground and surface water flows and decreased surface water runoff, via the use of Sustainable urban Drainage systems (SUDS), utilising green infrastructure where possible and as guided by relevant national (and/or local standards) and guidance.</p> <p>Where SuDs are provided, arrangements must be put in place for their management and maintenance over their full lifetime.</p> <p><i>Water Supply</i></p>	The policy sets out the Council's mechanisms to reduce flood risk, promote water efficiency measures, and protect and enhance water quality.	D	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that 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.</p> <p><i>Water Quality</i></p> <p>All new development should have regard to the actions and objectives of appropriate River Basin Management Plans (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.</p> <p><i>Adaptation to Climate Change</i></p> <p>Development will be required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures. These include:</p> <ul style="list-style-type: none"> • Incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment. • Minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDs in accordance with (SuDs policy above). • Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading. • Seeking opportunities to make space for water and develop new blue infrastructure to accommodate climate change. 			
Policy NE9: Air Quality	<p>The council seeks to reduce exposure to areas of poor air quality, maintain areas of good air quality, and where possible improve air quality through restricting development or requiring acceptable and effective mitigation measures.</p>	<p>The policy describes the Council's ambition to reduce exposure to areas of poor air quality, maintain areas of good</p>	D	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>Proposed developments which have the potential to 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.</p> <p>All proposals should take account of the Medway Council Air Quality Planning Guidance that sets out a screening checklist for major size development and proposed development within, or close to an AQMA. Depending on the scale of development, the council may require the submission of an Air Quality Assessment and/or an Emissions Mitigation Assessment.</p> <p>The guidance also advocates mitigation measures for all development. Where mitigation is not integrated into a scheme, the council will require this through a planning condition(s). If on site mitigation is not possible, then the council may seek contribution to wider air quality mitigation measures through a planning obligation.</p>	<p>air quality, and where possible improve air quality through restricting development or requiring acceptable and effective mitigation measures.</p>		
<p>Policy BE1: Promoting High Quality Design</p>	<p>Development in Medway will be expected to be of high quality design that makes a positive contribution and respond appropriately to the character and appearance of its surroundings.</p> <p>Proposals that incorporate high quality design and demonstrably consider the following criteria will be permitted:</p> <ul style="list-style-type: none"> • The scale and form of development is appropriate to its surrounding context and is characteristic of Medway; • The protection and possible enhancement of the historic environment and heritage assets; • How the proposal relates to and/or reinforces the local distinctiveness and character through the use of high quality materials and local vernacular materials where appropriate; landscaping and building detailing; • Working with the topography of the site and the incorporation of existing natural features; 	<p>The policy describes the council's approach to promoting high quality design in development proposals.</p>	<p>G</p>	<p>Out</p>

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> • Responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site; • Makes efficient use of land and ensures appropriate streetscapes; • Good connectivity permeability that provides a clear user hierarchy for pedestrians, cycles, public transport and cars and that streets and spaces within new residential developments are not overly car dominated; • Demonstration of provision and/or access to essential services and facilities; • Respects the amenity of neighbouring uses through consideration of light levels, overshadowing, overlooking, loss of privacy, visual intrusion, appropriately designed car parking and ensuring minimal impact through noise, vibration, fumes or light pollution, and other relevant considerations; • Creates a safe environment; • Buildings that are appropriately flexible/adaptable and in appropriate circumstances transformable in the interests of sustainable life-long places; • Provides for discreet waste and recycling bin storage and collection in accordance with the 'Medway Waste Management Requirements for New Developments' or other superseding guidance; • High quality landscaping and areas of public realm that make use of or retaining features considered relevant/important by the Council and demonstrating linkages/contribution toward green infrastructure assets and networks; • Achieves a transition from urban to rural where appropriate; • Includes measures to mitigate and adapt to climate change. • For non-residential development to at least meet a BREEAM standard of 'Very Good' for both energy efficiency and water efficiency. 			

Title	Policy	Rationale	Assessment Category	Screened In/Out
	Proposals that fail to take the opportunity to incorporate high quality design will be resisted.			
Policy BE2: Sustainable Design	All new development should aim for high standards of sustainable design and construction where feasible. For residential development this will include meeting the higher national water efficiency standard of 110 litres/person/day.	The policy provides an aspiration for high standards of sustainable design and construction.	A	Out
Policy BE3: Housing Design	New housing developments should provide good living conditions for future occupants with high quality, robust, adaptable housing and functional spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities. All new accommodation must, in addition to the general design policy above: <ul style="list-style-type: none"> As a minimum meet the relevant nationally described internal space standard for each individual unit; As a minimum meet the Medway Housing Design Standard (MHDS) for external spaces including shared outdoor amenity space, shared access and circulation, cycle storage, refuse and recycling, management, visual privacy and private outdoor space, environmental comfort; Be arranged to ensure primary habitable rooms have an acceptable outlook and where possible receive direct sunlight; Be designed to minimise the disturbance to occupants from other land uses nearby and/or other sources of noise, vibration and pollution; Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms, unless there is justification for doing so on the basis of a significant design quality gain; Incorporate sufficient space for storage and clothes drying; 	The policy sets out the standards required for new housing developments.	G	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> Encourage the extensive use of trees as a positive contribution to air/environmental quality within housing developments; Be designed with a clear and particular attitude to place-making and distinctiveness within their context. 			
Policy BE4: Housing Density Approach	<p>The council will seek the efficient use of land and secure positive contributions to place-making through supporting developments at higher densities in appropriate locations, where it can be demonstrated that it does not create an unacceptable impact on the surrounding amenity and environment, and has the potential to boost the vibrancy and vitality of town centres.</p> <p>Density should be reflective of the particularity in its surroundings and make the most effective and efficient use of land.</p> <p>The council will consider varying attitudes to density on a case by case basis in developing masterplans and development briefs for regeneration sites.</p> <p>Densities surrounding transport interchanges (railway stations and bus stations) will be expected to be higher to reflect the nature of these areas as transport hubs providing sustainable travel choices.</p> <p>A range of house types should be considered regarding housing mix.</p>	The policy provides general aspirations for density of housing proposals.	A	Out
Policy BE5: Historic Environment	<p>To ensure the continued contribution that the historic environment has on Medway, the council will support the conservation and, where possible, the enhancement of the historic environment; including the heritage assets and their distinctiveness and characteristics. This will be achieved through:</p> <ul style="list-style-type: none"> Restricting development that could have an unacceptable impact on a designated heritage asset and its setting; Ensuring that all new development contributes to local distinctiveness and character; Encouraging development that makes sensitive use of historic assets, particularly where they are under-used or redundant; 	The policy seeks to conserve and enhance Medway's historic environment.	D	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> Promoting the preservation of historic buildings considered to be ‘at risk’; Resisting demolition or destruction of heritage assets without substantial justification that clearly demonstrates that public benefit outweighs the harm or loss resulting from the demolition or destruction; Working with stakeholders on heritage initiatives, including bids for funding. 			
Policy BE6: Managing development in the historic environment	<p>Development that impacts a heritage asset, or its setting, should achieve a high quality of design which will preserve or enhance the asset’s historic or architectural character, appearance and setting.</p> <p>Where a development impacts upon a heritage asset, or its setting, a proportionate heritage assessment must be submitted that assesses the level of impact.</p> <p>The demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that all possible methods of preserving the asset have been investigated. In the circumstances where the loss of a heritage asset can be fully and robustly justified, the developer must make information about the heritage asset and its significance available to the council, along with making it possible for any materials and features to be salvaged.</p> <p>Where a development involves, or has the potential to involve heritage assets with archaeological interest, applicants must submit a desk-based assessment, or where appropriate, a field evaluation.</p>	The policy seeks to ensure that where development impacts the historic environment, high quality design will preserve or enhance the heritage asset and its setting.	D	Out
Policy HC1: Promoting Health and Wellbeing	<p>The council is committed to reducing health inequalities, increasing life expectancy and improving quality of life. It will support work to improve economic and social opportunities to tackle disadvantage across Medway by:</p> <ul style="list-style-type: none"> Seeking opportunities to improve access to healthcare facilities and activities that promote physical and mental health and wellbeing. Requiring planning applications for major new residential developments where Environmental Impact Assessments are required, or developments 	The policy outlines how the Council will reduce health inequalities, increase life expectancy and improve quality of life.	G	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>identified by the council with the potential for negative health impacts, to be accompanied by a health impact assessment in line with the HUDU Rapid Health Impact Assessment Tool. The results of this assessment will be a material consideration in determining applications.</p> <ul style="list-style-type: none"> • Helping to tackle obesity, encourage physical activity and support mental wellbeing, through the provision of greenspaces, public realm and sports facilities accessible to all, creating and enhancing environments conducive to walking and cycling. • Ensuring new development is sustainably located with access to local health facilities, and contributes to increasing capacity in line with the scale of proposed growth, and the council's policy for infrastructure contributions from developers. • Increasing access to healthy food choices through extending opportunities for growing food such as allotments & community gardens; securing a range of local services; and a reduction in the proliferation of uses promoting unhealthy food options, including controls on A5 uses, in line with the council's Hot Food Takeaway Guidance Note. • Promoting health and wellbeing through the design and layout of development in order to mitigate health conditions, such as dementia, and improve the accessibility of public places. • Working alongside healthcare commissioners to plan for the future of acute care the council will seek to investigate the redevelopment of the present Medway Maritime Hospital site and if deemed necessary the relocation, or partial relocation of some services, to a new site within Medway. 			
Policy HC2: Community Facilities	The council recognises the importance of community facilities and the need for an appropriate range of facilities as a key component of sustainable development. The council will seek to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors.	The policy provides general criteria for testing the sustainability of community facilities	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>The council will support appropriate development that seeks to enhance community facilities, that does not have a negative impact on the surrounding amenity, historic and natural environment and transport networks.</p> <p>The council will require provision to be made for community facilities in planning for new development. Large scale residential developments will be required to provide community facilities to meet the needs of new residents and seek opportunities to support integration with existing communities.</p> <p>New community facilities should be located within or near the community they are intended to serve and should be appropriately located to limit the need to travel, being accessible to users by walking, cycling and public transport.</p> <p>If the development is smaller scale and community facilities cannot be accommodated on site, a contribution will be sought to upgrade appropriate facilities off site, where it can be demonstrated that they are accessible to residents of the new development and that there is capacity for the increased population. All developments for over 10 homes will be required to contribute to upgrading community facilities in line with the council's policy on infrastructure contributions from developers.</p> <p>There is a presumption against the loss of community facilities in rural and urban areas. Any proposal which would result in the loss of a community facility will not be permitted unless:</p> <ul style="list-style-type: none"> • an alternative community facility which meets similar local needs to at least the same extent is already available; and • it can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character and vitality of the area; and • in the case of commercial community facilities, it has been demonstrated that it is no longer economically viable and cannot be made so. 	provision as part of new development. The council will require the provision of community facilities in development proposals.		
Policy II: Infrastructure	The council will seek the timely and effective delivery of infrastructure to support the local economy and meet the needs of Medway's communities. It will seek	The policy provides general criteria for	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
Planning and Delivery	<p>opportunities through working with government agencies, infrastructure bodies, developers and partner organisations to secure improvements to infrastructure in Medway.</p> <p>It will produce and regularly review an Infrastructure Delivery Plan, identifying the range, cost and scope of infrastructure improvements required in Medway.</p> <p>Development coming forward in Medway will be expected to contribute to the delivery of new and improved infrastructure, in line with the council's evidence base and policy for infrastructure contributions from developers.</p> <p>Appropriate conditions will be attached planning permissions in order to make development acceptable and to support the provision of infrastructure.</p> <p>The council will identify land for safeguarding for the provision of future infrastructure where required to meet specific development needs.</p> <p>The council will engage with appropriate bodies on strategic infrastructure planning matters, meeting the Duty to Cooperate and where appropriate, and through Statements of Common Ground supporting plan making.</p>	testing the acceptability of infrastructure provisions in development proposals.		
Policy I2: Developer Contributions	<p>To make development acceptable and enable the granting of planning permission, deficiencies in infrastructure arising from proposed development will be mitigated through developer contributions and conditions.</p> <p>Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to provide or contribute towards the additional requirement to an agreed delivery programme. Where demonstrated to be necessary, the council will require that infrastructure is delivered ahead of the development being occupied.</p> <p>Where developers consider that providing or contributing towards the infrastructure requirement would have serious implications for the viability of a development, the council will require an "open book" approach and, where necessary, will operate the policy flexibly.</p>	The policy provides criteria for additional infrastructure provision where deficiencies are identified.	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
Policy I3: Education	<p><i>Early Years & School Provision</i></p> <p>As Medway's population grows additional school places will be needed. New residential developments of significant scale will be expected to provide education facilities within their development in order to create sustainable communities. The requirements will be informed by the council's School Organisation Plan and Education Planning team providing an assessment of the capacity and suitability of existing local schools to expand existing school provision.</p> <p>All proposals for residential developments over 10 homes will be required to contribute to the funding of education services in accordance with the council's policy for infrastructure contributions from developers.</p> <p>Proposals for the upgrading and expansion of existing schools and development of new schools in locations where additional provision is required will be supported subject to the criteria below. The council may use its Compulsory Purchase powers to facilitate the development of new schools where necessary.</p> <p>Proposals for new education facilities should:</p> <ul style="list-style-type: none"> • have safe access by cycle and walking, public transport and car and incorporate a school travel plan; • have safe drop-off and pick-up provision; • provide outdoor facilities for sport and recreation; and • avoid conflict with adjoining uses. <p>The Council supports consideration of opportunities for co-location of community services and shared use facilities on school sites. Educational facilities shall be encouraged to diversify to provide a wider range of services to benefit the whole community, such as sports facilities or community centres open to the public.</p> <p><i>Further & Higher Education</i></p> <p>The development and expansion of the Universities at Medway and Higher and Further Education Colleges will be supported within the 'learning quarter' at Chatham Maritime. Development of supporting uses where there is an identified</p>	<p>The policy provides general criteria for testing the acceptability for education provision in development proposals. Beyond reference to the provision of further and higher education facilities in Chatham, which is not near any European sites, the policy does not specify the location of facilities.</p>	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	link to the Universities and other research and development establishments will be supported where appropriate, and does not conflict with other policies in the plan.			
Policy I4: Communications Technology	<p>In order for Medway to achieve its economic and social potential and maintain its status as a well-connected place to live and work, the Council will seek to develop and enhance the provision of broadband and telecommunications infrastructure coverage across Medway.</p> <p>When considering proposals for the development of communications installations, regard will be given to:</p> <ul style="list-style-type: none"> operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications apparatus; the potential for sharing existing masts, buildings and other structures; and the impact of the development on its surroundings with particular regard to the visual amenity, character or appearance of the surrounding area, and the proposed provision of landscaping. <p>Apparatus and associated structures sited on a building should be sited and designed in order to seek to minimise impact to the external appearance of the host building.</p> <p>Development should not have an unacceptable effect on conservation areas or buildings of architectural or historic interest or areas of ecological interest or areas of landscape value or sites of archaeological importance.</p> <p>Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.</p> <p><i>Broadband</i></p> <p>Proposals for new major employment and residential developments should include appropriate infrastructure, wired and wireless, to provide high speed internet access as part of the development.</p>	The policy provides an aspiration to develop Medway's communications technology, while ensuring no unacceptable effects on areas of ecological interest.	A	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
Policy I5: Utilities	Any new development will be supported by the requisite utilities infrastructure. Significant new development proposals will be assessed to determine the impact on the existing network (water, electricity and gas). Any development that would create a demand that could not be accommodated within the existing capacity will be expected to secure the necessary upgrades.	The policy requires the provision of the requisite utilities infrastructure to support development proposals.	D	Out
Policy I6: Open Space and Sports Facilities	Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: <ul style="list-style-type: none"> an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. 	The policy identifies the need to protect open space and sports facilities.	D	Out
Policy I7: New Open Space Provision	Provision for new open space will be in line with specifically identified needs, informed by a robust assessment. Strategic scale development will be required to provide new greenspaces to meet community needs, and contribute to the quality of placemaking.	The policy provides general criteria for testing the acceptability of open space provision in development proposals.	B	Out
Policy I8: New Playing Pitches	New pitches will be provided in line with specifically identified needs, informed by a robust assessment. Any new playing pitches should be constructed in line with Sport England guidance.	The policy provides general criteria for testing the acceptability of open space provision in development proposals.	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
Policy I9: Gillingham Football Club	The council recognises Gillingham Football Club's important strategic and community role and intends to secure its future in Medway.	This policy provides a general aspiration to locate Gillingham Football Club in Medway, but does not relate to a specific location.	A	Out
Policy T1: Promoting sustainable transport	<p>The council will work with the relevant authorities and transport providers to:</p> <ul style="list-style-type: none"> • support the Medway Local Transport Plan (2011-26) and subsequent iterations during the plan period, along with the associated three-year Implementation Plans and strategies • ensure development is located and designed to enable sustainable transport • mitigate the impacts of new development according to Transport Assessments and Transport Statements, or refuse development where its residual cumulative impacts are severe • require a Travel Plan for development which will generate significant amounts of movement • plan for strategic road network and rail improvements • improve public transport provision and the walking and cycling network • develop an integrated transport strategy for Medway to deliver sustainable growth • engage with the relevant authorities to address the impacts of the proposed Lower Thames Crossing • undertake any necessary revisions to the adopted Parking Standards • improve air quality as a result of vehicular emissions 	The policy describes the council's general approach to promoting sustainable transport and improve air quality.	D	Out
Policy T2: Linking	The council promotes development which supports the use of sustainable transport.	The policy provides a general aspiration to	A	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
sustainable transport and development	It seeks to realise opportunities for making the best use of land, by promoting higher density housing development in areas within close walking distance of the main rail stations (Strood, Rochester, Chatham, Gillingham and Strood) and Chatham Waterfront bus interchange in line with the proposed levels set out at Table 11.1. Proposals which compromise this policy will be resisted.	support the use of sustainable transport.		
Policy T3: Hoo Peninsula rail connection	The council intends to safeguard land for new rail infrastructure, including a station, route alignment and buffer stop zone. Proposals which compromise this policy will be resisted. Proposals which demonstrate consistency with the Hoo Development Framework and any subsequent masterplans will be encouraged. The council will work with strategic transport bodies and wider partners to seek investment in providing new passenger rail services on the Hoo Peninsula.	Site allocations on the Hoo Peninsula associated with the proposed rural town have potential to provide supporting habitat to north Kent marshes European sites. There are likely significant effects associated with encouraging development on the Hoo Peninsula and provision of new rail infrastructure, including habitat loss, disturbance, reduced air quality and reduced water quality and levels.	I	In (alone)
Policy T4: Rochester Airport	Rochester Airport will be safeguarded to provide an enhanced aviation facility for business, public service, training, heritage and leisure uses, and support the development of a strategic gateway and an economic hub.	The policy provides general criteria for testing the acceptability development proposals at Rochester Airport, which	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	Proposals will need to demonstrate how any impacts will be mitigated, including air quality, noise, traffic, and amenity.	is not located near to any European sites.		
Policy T5: Riverside Infrastructure	<p>This policy intends to reinforce Medway's strategic location in the Thames Gateway. Ports and wharfage will be safeguarded in order to support existing business sectors and to attract businesses requiring such facilities.</p> <p>The allocation of Chatham Docks for mixed use development will be regularly reviewed, taking account of market signals and development needs. Innovative, mixed use proposals for this strategic site will be encouraged.</p> <p>Riverside infrastructure associated with the transport of minerals, waste and other defined materials will be safeguarded in accordance with national planning policy.</p> <p>The existing network of piers, jetties, slipways, steps and stairs will be safeguarded to support the potential for visitor and river taxi services and to accommodate visiting vessels, while any new facilities will be encouraged.</p> <p>Riverside infrastructure will be required to comply with the requirements of conserving the designated environmental features of the estuaries and river. Development must demonstrate that there will be no loss of protected or priority habitats or species, unless the impacts are not significant at a waterbody scale, and can be adequately mitigated for.</p>	There are likely significant effects on European sites associated with the potential introduction of visitor and river taxi services and provision of new riverside infrastructure facilities. Such effects could include habitat loss and fragmentation, disturbance and changes to water levels and quality.	I	In (alone)
Policy T6: Medway Riverside Path	<p>The council intends to maximise the potential of the River Medway and its edges as a strategic priority.</p> <p>Waterfront development proposals will incorporate public space to facilitate walking and cycling and demonstrate the highest design standards, including Sport England's Active Design guidance.</p> <p>Proposals will need to demonstrate how any impacts will be mitigated.</p>	<p>The policy provides criteria for testing the acceptability of proposals to improve Medway riverside path, which has a potential to contribute towards recreational disturbance within the north Kent marshes European sites.</p> <p>The policy provides</p>	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
		adequate mitigation for likely significant effects.		
Policy T7: Marinas and moorings	<p>Proposals for marinas and permanent moorings will be permitted where:</p> <ul style="list-style-type: none"> • It will meet a proven need • In an urban location, it is supported by the provision of other commercial leisure uses at an appropriate scale without undermining the role of centres and their vitality and vibrancy • Required for the proper functioning of an existing facility or to enhance and improve access to the waterway • Will not have a significant adverse impact on transport network • Will not result in increased flood risk further downstream or elsewhere • Will not conflict with neighbouring uses, have a significant adverse impact or result in unacceptable environment consequences. A detailed HRA may be required. • Provision of access, servicing and car parking is made in a form that will not adversely impact on amenity particularly with regard to the waterways • The site has adequate land-based utility infrastructure and support facilities including sewage, waste, water, secure storage and washing <p>Proposals will be required to demonstrate careful consideration with regard to the Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest and the Marine Conservation Zone. Developments will need to adhere to the council's policy for the North Kent Strategic Access Management and Monitoring Scheme.</p>	There are likely significant effects associated with proposals for marinas and permanent moorings, including habitat loss, disturbance and reduced water quality. However, the policy has made allowance for this and included acceptable mitigation to avoid such effects.	H	Out
Policy T8: Urban Logistics	This policy will support the logistics sector to develop in Medway and encourage efficient courier distribution, likely to be a significant source of local traffic congestion.	The policy encourages efficient courier distribution.	G	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>The loss of existing B8 (storage or distribution) uses will be resisted, unless it can be demonstrated that the site is no longer suitable for this activity, for example due to amenity issues.</p> <p>This policy only applies to premises under 500 sq m if and when temporary permitted development rights are removed under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the change of use to B1 business and C3 residential use.</p>			
Policy T9: Connectivity and Permeability	<p>Proposals must demonstrate how the street layout will promote connectivity and permeability.</p> <p>Masterplans and/or Design and Access Statements must demonstrate how the proposed street layout will promote ease of movement along safe routes and integrate with adjacent built-up areas. The external connectivity and internal permeability of new development proposals will require careful consideration. Development will be expected to be integrated with the public realm and public transport, in particular ensuring that local facilities and services are easily accessible by foot or bicycle.</p> <p>The council will seek to expand the network of safe pedestrian and cycle routes to ensure that areas dedicated to vehicular circulation are designed with pedestrian safety and needs of vulnerable groups in mind.</p> <p>Proposals which highlight design features for vulnerable groups will be encouraged.</p>	The policy requires development proposals to demonstrate how the street layout will promote connectivity and permeability.	G	Out
Policy T10: Vehicle Parking	<p>Planning applications for residential and non-residential development will be determined in accordance with the adopted Parking Standards.</p> <p>For predominantly residential development, Design and Access Statements must demonstrate how vehicle parking adheres to the following design principles:</p> <ul style="list-style-type: none"> formal parking bays as part of the carriageway, indicated by clear road markings or surfacing access to vehicles should be from the front of the property 	The policy lists the design principles to be demonstrated in Design and Access Statements.	G	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> • avoid parking within the front curtilage of the property where appropriate • well surveyed • planting to soften the impact of vehicles • establish 'home zones' where appropriate • accommodate parking for larger, commercial vehicles • accommodate parking for Blue Badge holders in suitable locations • accommodate dedicated spaces for car club membership where appropriate • accommodate electric and other ultra-low emission vehicle parking <p>In line with national policy and guidance, the council will seek opportunities to improve the quality and, where appropriate, the quantity of parking in town centres. In addition, the strategic management of public car parking, as set out in the LTP, will support the vitality of town centres.</p>			
Policy T11: Cycle parking and storage	<p>Development proposals will be expected to comply with the cycle parking standards in accordance with the council's adopted Parking Standards.</p> <p>Long term cycle parking facilities for residents, visitors and/or employees of the development must be conveniently located; safe to use; secure; weatherproof; and be well integrated into the building and/or layout of the site.</p> <p>Short term cycle parking facilities should be conveniently located in relation to the public realm and safe to use.</p> <p>For dwelling houses, individual provision should be made within the private garden area. For flatted developments and commercial uses, communal cycle stores should be provided.</p> <p>In the event that internal space constraints mitigate against providing on-site provision, the Council may seek contributions from the developer towards secure on-street residential parking or maintenance of strategic cycle routes throughout the Borough; where appropriate.</p>	<p>The policy identifies the council's current Parking Standards cycle parking and storage requirement for new development.</p>	G	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
Policy T12: Managing the transport impact of development	<p><i>Transport Assessments for Transport Statements</i></p> <p>Development proposals will need to demonstrate their effect on traffic and transport by provision of Transport Assessments (TAs).</p> <p>For major developments, the Council will require that all TAs are to be assessed in line with the Medway Strategic Transport Model (STM) in order to undertake a micro level transport modelling exercise with alternative mitigation scenarios. The outputs of which, will then be verified by an independent third party and used as part of the decision-making process.</p> <p><i>Travel Plans</i></p> <p>Travel Plans will also be required for developments above threshold sizes, specified by the council.</p> <p><i>Vehicular Crossovers</i></p> <p>Developments, including those that require new or additional crossovers, will need to demonstrate that the proposal would not cause a road safety hazard to vehicle occupants, cyclists and pedestrians.</p>	The policy provides general criteria for testing the sustainability of development proposals by demonstrating their effects by the provision of TAs.	B	Out
Policy MWE1: Minerals Supply	<p>The council will plan for a steady and adequate supply of minerals by:</p> <ul style="list-style-type: none"> • Maintaining a 7-year landbank of permitted sand and gravel reserves; • Supporting regional consideration and planning of minerals through its membership of the South East England Aggregates Working Party. 	The policy provides a general aspiration to plans for a steady and adequate supply of minerals.	A	Out
Policy MWE2: Land-won extraction of sands and gravels	<p>Proposals for the extraction of sand and gravel will be permitted within the identified areas of search when:</p> <ul style="list-style-type: none"> • There is a proven need for the minerals to be extracted at that time in order for the council to maintain a 7-year landbank; • There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and 	The areas of search for the land-won extraction of sands and gravels are adjacent or close to European sites. The area at Hoo St Werburgh is located adjacent to Medway Estuary & Marshes SPA/Ramsar	I	In (alone)

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> The proposed development is in accordance with the provisions of the Local Plan; <ul style="list-style-type: none"> Exceptions will be considered when there are demonstrable overriding benefits that justify the development. <p>Where development is proposed at, or within 250m of a safeguarded area of search, the Planning Policy team will be consulted for its views prior to a planning decision being made.</p>	<p>and the 250m consultation areas fall within this European site. At Grain and Allhallows, the areas are close to Thames Estuary & Marshes SPA/Ramsar site. The policy does not provide mitigation for adverse environmental effects. As such, there are likely significant effects on European sites associated with habitat loss and fragmentation, disturbance, reduced water quality and air quality.</p>		
Policy MWE3: Land-won minerals: chalk and clay	<p>Proposals for the extraction of land-won minerals will be permitted outside of the identified areas of search when:</p> <ul style="list-style-type: none"> There is no adverse impact on sites designated for environmental or heritage significance; There is a proven need for the minerals to be extracted at that time; The site is not allocated for another use in the Local Plan; The site is located in an area that can accommodate the proposed development; There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and 	<p>It is not possible to rule out likely significant effects associated with the extraction of land-won minerals outside of the identified areas, given that these areas are not specified and the policy makes an allowance for such activities despite adverse environmental impacts. Significant effects could</p>	I	In (alone)

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> The proposed development is in accordance with the provisions of the Local Plan; <ul style="list-style-type: none"> Exceptions will be considered when there are demonstrable overriding benefits that justify the development. 	include habitat loss, disturbance and reduced water and air quality.		
Policy MWE4: Minerals wharves and railheads	<p>The identified minerals importation and distribution facilities that currently benefit from permanent planning permission will be safeguarded from development that would prejudice or prevent their operation, unless;</p> <ul style="list-style-type: none"> The proposed site is already allocated for other uses in the Local Plan; It can be demonstrated that the facility is no longer required; Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or Alternative equivalent provision for the loss of the importation or distribution facility can be made elsewhere in Medway. <p>Where development is proposed at, or within 250m of a safeguarded importation or distribution facility, the Planning Policy team will be consulted for its views prior to a planning decision being made.</p>	The policy sets out how Medway's three wharfs will be safeguarded.	G	Out
Policy MWE5: Minerals infrastructure	<p>Facilities for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material in Medway will be safeguarded from development that will prejudice or prevent their operation, unless;</p> <ul style="list-style-type: none"> The proposed site is already allocated for other uses in the Local Plan; It can be demonstrated that the facility is no longer required; Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or Alternative equivalent provision for the loss of the facility can be made elsewhere in Medway. 	The policy sets out how Medway's minerals infrastructure will be safeguarded.	G	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	Where non-waste development is proposed at, or within 250m of safeguarded waste management facilities, the Planning Policy team will be consulted for its views prior to a planning decision being made.			
Policy MWE6: Waste Management	<p>All development should seek to minimise the generation of waste, having regard to the Waste Hierarchy.</p> <p>The council will promote sustainable waste management within all new developments, ensuring that there is an appropriate provision for the separation, storage and collection of waste.</p> <p>In order to help reduce waste through the development process, planning applications for major or strategic development or those where significant levels of waste will be generated must include a waste management audit that describes how waste is to be managed throughout the lifetime of the development; including that arising through the demolition, remediation and construction phases.</p> <p>The council will continue to actively support regional consideration and the planning of waste management through its membership of the South East Waste Planning Advisory Group (SEWPAG), and with neighbouring Waste Planning Authorities on cross-border waste management issues and opportunities.</p>	The policy provides general criteria for testing the sustainability of waste management in existing and new development.	A	Out
Policy MWE7: New Waste Management Facilities	<p>The council will strive to maintain net self-sufficiency across each of the waste streams through permitting facilities for the reuse, recycling, treatment and transfer of waste materials, subject to their being of an appropriate environmental standard. Medway City Estate and Kingsnorth and, at a lesser scale, the existing established industrial estates are the preferred locations for such activities. The development of waste facilities outside of identified industrial areas will only be permitted where:</p> <ul style="list-style-type: none"> • There is no adverse impact on sites designated for environmental or heritage significance; • The site is not allocated for other uses in the Local Plan; 	<p>The policy provides criteria for testing the acceptability of the development of waste facilities outside of identified industrial areas, including adequate mitigation for impacts on European sites.</p> <p>However, the development of waste management that utilises</p>	I	In (alone)

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> The site is located in an area that can accommodate the proposed development and does not have an unacceptable impact on amenity, the local environment and transport networks; and The site comprises brownfield land; <ul style="list-style-type: none"> Proposals on green field land will only be permitted where no alternative suitable brownfield sites can be identified. <p>Special consideration will be given to the development of waste management within existing established industrial estates that utilise existing rail facilities or the river Medway as a means of transportation.</p>	the River Medway as a means of transportation has a potential to lead to increased boat traffic and therefore significant effects on European sites, including through disturbance and reduced water and air quality.		
Policy MWE8: Existing Waste Management Facilities	<p>Existing waste management facilities that currently benefit from permanent planning permission will be safeguarded from development for non-waste management uses, unless;</p> <ul style="list-style-type: none"> The proposed site is allocated for other uses in the Local Plan; It can be demonstrated that the facility is no longer required; Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or Alternative equivalent provision for the loss of the waste management facility can be made elsewhere in Medway. <p>Where non-waste development is proposed at, or within 250m of safeguarded waste management facilities, the Planning Policy team will be consulted for its views prior to a planning decision being made.</p>	The policy sets out how existing waste management facilities will be safeguarded.	G	Out
Policy MWE9: Waste disposal to land	<p>Proposals for the creation of void space or land-raising to facilitate a disposal facility for non-inert or hazardous waste located within the areas referred to as the Disposal to Land Resource Areas on the Hoo Peninsula and Isle of Grain will be assessed against the following criteria:</p> <ul style="list-style-type: none"> Impact of development on rural landscape character and local distinctiveness; 	There are likely significant effects on European sites associated with the provision of a disposal facility for non-inert or hazardous waste within the areas referred	I	In (alone)

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<ul style="list-style-type: none"> • Other local impacts, including on residential amenity, being acceptable; • The site being well related to the primary road network and with suitable site access and egress arrangements, and that impacts on the transport network are acceptable. Opportunities for transport by rail and water are encouraged; • It being clearly demonstrated that the material to be deposited cannot be reasonably disposed of in any other way (that is that they are irreducible residues); • That the facility will handle a high proportion of such waste arising within Medway and the immediately surrounding area to ensure a sustainable pattern of disposal; • Unless a specific needs case can be demonstrated, that wastes to be deposited do not involve a road haulage distance of more than 50 miles; • That all the reasonable requirements of the Environment Agency can be satisfied; and • There being a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site. 	to as the Disposal to Land Resource Areas on the Hoo Peninsula and Isle of Grain. The policy does not include criteria relating to mitigating or avoiding environmental impacts and, while these areas are located outside European sites, these Disposal to Land resource areas have potential to provide supporting habitats to north Kent marshes European sites. There are likely significant effects associated with habitat loss, disturbance and reduced water and air quality.		
Policy MWE10: Waste Water Treatment Works	Proposals for the development of new, or the extension to existing waste water treatment works, sewage treatment and disposal facilities will be permitted in sustainable locations where there is a proven need for the proposed facility, and development does not conflict with the need to safeguard the environment and does not create unacceptable impacts on amenity.	The policy provides general criteria for testing the acceptability of the extension to existing waste water treatment works, including adequate mitigation for adverse impacts on European sites.	B	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
Policy MWE11: Energy and Renewables	<p>Proposals for energy developments, including any ancillary building or infrastructure, will be supported unless:</p> <ul style="list-style-type: none"> the impact would compromise statutory designations where national planning policy restricts development; their scale, form, design, material and cumulative impacts is unacceptable to the local landscape or built environment, or loss of the best and most versatile agricultural land; any adverse impacts on the local community, economy, biodiversity or historic interests cannot be mitigated; The council will consider the designation of defined areas for renewable energy technologies through a Local Landscape Character Assessment. <p>The council will actively promote the development of local supply chains and other associated employment opportunities.</p> <p>The council will explore opportunities for Combined Heat and Power Systems connected to district heating networks.</p>	The policy provides general criteria for testing the acceptability of proposals for energy development and provides adequate mitigation avoiding adverse impacts on European sites.	B	Out
Policy MWE12: Low Carbon Development	<p>This policy seeks to implement an energy hierarchy by achieving energy efficiency first, before requiring the implementation of other forms of renewable energy generation on a larger scale.</p> <p>Developers are required to follow the hierarchical approach set out below in achieving the energy and carbon dioxide emission requirements of the Building Regulations for all new residential development. New non-residential development is encouraged to follow the same approach.</p> <ol style="list-style-type: none"> To improve energy efficiency through thermal and fabric performance improvement measures. Provide on-site renewable energy generation or on-site connected heating, or Combined Heat and Power (CHP) technologies, or Combined Cooling, Heat and Power (CCHP) systems. 	The policy promotes low carbon development.	G	Out

Title	Policy	Rationale	Assessment Category	Screened In/Out
	<p>3. The remainder of the carbon reduction targets to meet the Building Regulations targets should be met through suitable additional measures. Developers are encouraged to meet higher standards than those required nationally, and pursue additional low carbon or renewable energy generation measures where practicable.</p> <p>Compliance with this policy approach is required to be demonstrated through design and access statements submitted with a planning application.</p>			

D2 Site Allocations Screening

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
Schools				
Moor St, Rainham	1	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
South of A228, Hoo St Werburgh	2	All	Within a North Kent Marshes Functional Land IRZ and therefore there is a likely significant effect on the north Kent marshes SPA/Ramsar sites associated with habitat fragmentation and loss.	In (alone)
Manor Farm, Strood	3	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
East of Hempstead Road	4	All	Within a North Kent Marshes Functional Land IRZ. As such, there is a likely significant effect on the north Kent marshes SPA/Ramsar sites associated with habitat fragmentation and loss.	In (alone)
South of A228, Hoo St Werburgh	5	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Chattenden	6	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Cornwallis Ave, Gillingham	7	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Capstone Valley	8	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
North of Priory Rd, Strood	9	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Manor Farm, Strood	10	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
Housing				
Former Gillingham Fire Station	1181	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in-combination)
Medway Maritime Hospital	1180	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in-combination)
Rainham Library	1183	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in-combination)
Parcel 2 North of Stoke Road, Hoo	1178	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Parcel 3 South of Stoke Road	1179	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Primary School	SO25	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in-combination)
Land at Capstone Valley, Darland Farm	0783c_North	1, 3, 4	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in-combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
Land at Capstone Valley, Darland Farm	0783d	1, 3, 4	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in-combination)
Land South of Stoke Road, Hoo	1174	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
East of Whitehouse Farm, Hoo	1044	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Land West of Ropers Lane, Hoo	1084	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
R/O Whitehouse Farm, Stoke Road, Hoo	1043	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Land West of Allhallows	SO9	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Deangate Cottage	SO2	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
South of Main Road, Hoo	1065a	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
			is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	
Canterbury Lane, Rainham	SO15	3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Rear of Lower Rainham Road/Station Road, Rainham	UB4g	1, 3, 4	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Land West of Hoo	753	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
South Ratcliffe Highway, West Vidgeon Avenue, Hoo	1066	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
In Land to East of High Halstow	1113	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Land to east of Chattenden Lane	714	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. Given the number of dwellings and proximity to Medway Estuary and Marshes SPA/Ramsar site, it is not possible to rule out likely significant effects associated with recreational disturbance alone.	In (alone)
31-39 Duncan Road, Gillingham	703	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
National Grid Property, Pier Road, Gillingham	687	All	Within 100m of Medway Estuary & Marshes Ramsar/SPA site and within a North Kent Marshes Functional Land IRZ. There are therefore likely significant effects associated with habitat loss and fragmentation, disturbance (recreation, noise and lighting) and reduced water quality and quantity.	In (alone)
The Platters, Rainham	303	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Wickes, New Cut, Chatham	869	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
55-105a The Brook & 1,5,11 & 12 King Street, Chatham	866	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
2-8 King Street and 1-11 Queen Street, Chatham	865	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
The Brook (R/O High Street and Batchelor Street) Chatham	857	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
1 Batchelor Street, Off the Brook, Chatham	834	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
Chatham Retailing, Clover/Richard/Rhode/High Street	243	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Tesco, Charles Street, Strood	843	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
National Tyre, Station Road, Strood	1039	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Ex Service station, Adj 86 Corporation Street, Rochester	700	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Strood Service Station, 3 London Road, Strood	603	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Land at High Street, Union Street and New Road, Chatham	860	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Car Park, Commercial Road, Strood	1115	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Land West of Commercial Road, Strood	SO22	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant	In (in combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
			effects associated with recreational disturbance in combination with other plans and projects.	
Deangate Ridge, Sports Complex, Chattenden	1121	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
North of Ratcliffe Highway	1175	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Land West of Lower Stoke	SO8	1, 2, 3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Former Police Station, Chatham	755	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Lodge Hill	0050a	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. Given the number of dwellings and proximity to Medway Estuary and Marshes SPA/Ramsar site, it is not possible to rule out likely significant effects associated with recreational disturbance alone.	In (alone)
1-35 High Street, Chatham (Grays Garage)	102	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Vixen Close, Lordwood	410	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
352-356 Luton Road, Luton	213	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
320 - 344 High Street inc. 42 New Road, Rochester	100	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Chatham Docks, Chatham	824	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Samuels Towers, Longhill Avenue	1112	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Driving Range, Street End Road	1114	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Junction of Pier Road and Medway Road, Gillingham	810	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Land at Burneys Farm, Lower Stoke	754	1, 2, 3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Medtha Bungalow, Port Victoria Road, Grain	833	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It	In (alone)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
			is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	
Middle Street Farm, Grain Road, Middle Stoke	794	1, 2, 3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Walnut Tree Farm, r/o Longfield Ave, High Halstow	835	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
26-36 Napier Road Gillingham	1018	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
143-145 Canterbury Street Gillingham	981	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
146 Canterbury Street, Gillingham	1098	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
85 Church Street Gillingham	547	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Land at 54 Beacon Road, Chatham	1048	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
111 Rainham Road (Jezreels), Gillingham	853	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Wooleys Orchard, land south of Lower Rainham Road	749	1, 3, 4	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
56A Pump Lane, Rainham	177	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
274-276 Station Road Rainham	182	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
101 Beacon Road, Chatham	1052	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Beacon Hill	236	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
LIFT site, 551-555 Canterbury Street, Gillingham	707	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Bennetts Orchard, Lower Rainham	849	1, 3, 4	Within 250m of Medway Estuary & Marshes Ramsar/SPA site and within a North Kent Marshes Functional Land IRZ. There are therefore likely significant effects associated	In (alone)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
			with habitat loss and fragmentation, disturbance (recreation, noise and lighting) and reduced water quality and quantity.	
Land west of Lower Station Road, Rainham	800	1, 3, 4	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Civic Centre and Janes Creek	137	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Manor Farm, Parsonage Lane	1088	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Land at Robins and Day	822	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
North side, Priory Road	1057	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
6-11 New Road Avenue, Chatham	1056	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Whiffens Avenue Car Park, Chatham	759	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
19 New Road Avenue and 3 New Cut, Chatham	868	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Between Cross Street & The Brook, Chatham	757	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
R/O 250 Main Road, Hoo	1072	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Strood Riverside, Canal Road	90	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
St Bartholomews Hospital, New Road, Rochester	144	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
3 Broad Street Cottages, Main Road, Hoo	1092	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Miles Place, Delce Road, Rochester	1106	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Manor Farm, Marsh Road, Halling	1105	1, 3, 4	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant	In (in combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
			effects associated with recreational disturbance in combination with other plans and projects.	
HMP Rochester, Sir Evelyn Road	712	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
13-15 Borough Road, Gillingham MLP Allocated Site	1156	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Berengrave Nursery	817	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Interface Land	0820a	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Interface Land, Chatham Maritime	0820b	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Retailing in Gillingham, High Street, Skinner Street, Jeffrey Street	39	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Rear of 47 High Street/Britton Street, Gillingham	873	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
Jeffrey Street, Gillingham	1184	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
J7, Chatham Maritime	818	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Norse Depot, Pier Approach Road	1188	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Unnamed	760	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Siloam Farm, Rainham	847	3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Westmoor Farm, Moor Street, Rainham	814	3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Land at Mierscourt Road, Rainham	1170	3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Unnamed	1189	3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant	In (in combination)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
			effects associated with recreational disturbance in combination with other plans and projects.	
Land at Capstone Valley, Darland Farm	0783c_South	1, 3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Elm Avenue, Chattenden	CH1g	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Hopewell Drive, Luton	SO17	3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Second Avenue, Luton	SO16	3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Firmstart Estate Twydall	SO11	3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Unnamed	n/k	3	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Steelfields, Danes Hill, Gillingham	1109	All	Adjacent to Medway Estuary & Marshes Ramsar/SPA site and within a North Kent Marshes Functional Land IRZ. There are therefore likely significant effects associated with habitat loss and fragmentation, disturbance (recreation, noise and lighting) and reduced water quality and quantity.	In (alone)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
Unnamed	n/k	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Mill Hill, Grange Road, Gillingham	774	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Land at Mill Hill, Grange Road, Gillingham	1073	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. It is therefore not possible to rule out likely significant effects associated with habitat loss and fragmentation and recreational disturbance.	In (alone)
Land at Priestfield, Gillingham	1089	All	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. It is therefore not possible to rule out likely significant effects associated with recreational disturbance in combination with other plans and projects.	In (in combination)
Lodge Hill (SSSI)	0050b	4	Within 6km of Medway Estuary and Marshes SPA/Ramsar site and/or Thames Estuary and Marshes SPA/Ramsar site. Given the number of dwellings and proximity to Medway Estuary and Marshes SPA/Ramsar site, it is not possible to rule out likely significant effects associated with recreational disturbance alone.	In (alone)
Employment				
Land north of Kingsnorth Industrial Estate	n/k	All	Within a North Kent Marshes Functional Land IRZ. There are therefore likely significant effects associated with habitat loss and fragmentation, disturbance (recreation, noise and lighting) and reduced water quality and quantity.	In (alone)
ELNA Kingsnorth 1	647	All	Within 100m of Medway Estuary & Marshes Ramsar/SPA site and within a North Kent Marshes Functional Land IRZ. There are therefore likely significant effects associated with habitat loss and fragmentation, disturbance (recreation, noise and lighting) and reduced water quality and quantity.	In (alone)
ELNA Rochester Airport	378	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
Diggerland, Roman Way, Strood	686	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Woolmans Wood Caravan Site	845	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Pit 2, Roman Way, Strood	705	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
BAE Systems, Rochester	724	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Interface Land (Northern Parcel), Chatham Maritime	0820a	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
M2 J4	786	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Old Park & Ride Site, Medway City Estate	1186	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Former Officers Mess	804	All	Outside the North Kent Marshes Functional Land IRZs and further than 250m from European sites.	Out
Medway Commercial Park (Kingsnorth)	730	All	Adjacent to Medway Estuary & Marshes Ramsar/SPA site and within a North Kent Marshes Functional Land IRZ. There are therefore likely significant effects associated with habitat loss and fragmentation, disturbance (recreation, noise and lighting) and reduced water quality and quantity.	In (alone)
Isle of Grain 4 & 5	n/k	All	Adjacent to Medway Estuary & Marshes Ramsar/SPA site, within 100m of Thames Estuary and Marshes SPA/Ramsar site and within a North Kent Marshes Functional Land IRZ. There are therefore likely significant effects associated with habitat loss and fragmentation, disturbance (recreation, noise and lighting) and reduced water quality and quantity.	In (alone)

Site Allocation	Ref.	Scenario(s)	Rationale	Screened In/Out
Hoo St Werburgh - Employment	n/k	All	Within a North Kent Marshes Functional Land IRZ. There are therefore likely significant effects associated with habitat loss and fragmentation, disturbance (recreation, noise and lighting) and reduced water quality and quantity.	In (alone)

Appendix E

Plans and Project Review for the In-Combination Assessment

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
Kent Local Transport Plan 4, 2016 ⁴⁷		
<p>To set out Kent County Council's (KCC) Strategy and Implementation Plans for local transport investment for the period 2016-31.</p>	<p>Consists of 5 key policies: deliver resilient transport infrastructure and schemes; promote affordable, accessible and connected transport; provide a safer road, footway and cycleway network; reduce the environmental footprint of transport and enhance the environment; promote active travel and implement measures to improve air quality. From these key policies, the strategic priorities and local priorities are required to deliver '<i>Growth without Gridlock</i>', including a new Lower Thames Crossing to the east of Gravesend.</p> <p>The key policies require the following local priorities within Medway:</p> <ul style="list-style-type: none"> • A289 Four Elms to Medway Tunnel improvements; • Improvements to the A229 corridor between Maidstone and Medway; • Strood and Chatham Town Centre Improvements; • Public Transport, Journey Time and Road Safety Improvements through the Medway Local Plan; • Rail improvements at Strood and Chatham Stations; • Tackling congestion hotspots along the A2 corridor through Medway; and • Improved cycling facilities throughout Medway. 	<p>The HRA Screening report⁴⁸ concluded that two priorities are potentially significant, including the Lower Thames Crossing which is of relevance to the in-combination assessment. However, significant effects on all Natura 2000 sites have been screened out on the basis that project level screening of likely significant effects will be undertaken as, in part, there is not enough information to determine whether uncertain effects associated with the plan are likely to be significant.</p>

⁴⁷ Kent County Council, (2016); 'Local Transport Plan 4: Delivering Growth without Gridlock 2016–2031.'

⁴⁸ Kent Country Council, (2016); 'Habitats Regulations Assessment (HRA) Screening Report: Kent County Council's Draft Fourth Transport Plan (LTP4). July 2016.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
Kent Minerals and Waste Local Plan, 2016 ⁴⁹		
<p>To describe the strategy for sustainable minerals supply and waste management in Kent up to the end of 2030. The spatial vision for minerals and waste in Kent will:</p> <ul style="list-style-type: none"> • Be sustainable and progress towards a low carbon economy; • Support the needs arising from growth; • Collaborate with communities, landowners the minerals and waste industries, the environmental and voluntary sector and local planning authorities; and • Ensure the natural and historically rich environment is conserved and enhanced for future generations. 	<p>Policy CSM 3 Strategic Site for Minerals relates to the site of the proposed Medway Cement Works, Holborough and its permitted mineral reserves. These are together identified as the Strategic Site for Minerals in Kent. This site is located immediately adjacent to Medway's southern boundary, partially within North Downs Woodlands SAC, and is therefore relevant to this assessment.</p>	<p>The HRA⁵⁰ concluded that, due to the inclusion of safeguarding policies, the Kent Minerals and Waste Local Plan is unlikely to have any significant negative effects on any European sites.</p> <p>The assessment suggests that further project-level measures are included with regard to Policy CSM3 – Strategic Site for Minerals. A Dust Action Plan is required to ensure that dust deposition outside the quarry is rendered negligible. It is also recommended that there be a 25m standoff between the SAC and the active quarry, unless subsequent analysis can prove this is not necessary.</p>
Thames River Basin Management Plan (RBMP) 2015 ⁵¹		

⁴⁹ Kent County Council, (2016); 'Kent Minerals and Waste Local Plan. Planning for the future of minerals and waste in Kent.'

⁵⁰ URS Infrastructure and Environment UK Limited, (2014); 'Kent County Council: Draft Minerals and Waste Local Plan 2013-30 Habitats Regulations Assessment. July 2014.'

⁵¹ Environment Agency, (2016); 'Water for Life and Livelihoods. Part 1: Thames River Basin District River Basin Management Plan Updated: December 2015.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
To provide a framework for protecting and enhancing the benefits provided by the water environment.	There are potential hazards associated with implementation of the measures in the RBMP. These hazards are associated with the types of measures that are related to each significant water management issue (SWMI) and indicate the potential levels of risk to the range of features of the network of European sites. This includes changes to natural flow and levels of water and risks to qualifying species and supporting habitats. There is, however, insufficient detail in the plan to allow consideration of effects on individual European sites.	The HRA ⁵² concluded that, at this strategic plan level, the range of potential mitigation options available allow a conclusion that the plan is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects. This conclusion is reliant on the fact that, before any measures in the plan are implemented, they must be subject to the requirements of the Habitats Regulations. Any plans, project or permissions required to implement the measures must undergo an AA if they are likely to have a significant effect.
Thames Estuary (TE) 2100 Plan ⁵³		
The TE 2100 project was established by the Environment Agency in 2002 with the aim of developing a strategic flood risk management plan for London and the Thames estuary through to the end of the century. The Plan primarily looks at tidal flooding, though other sources of flooding including high river flows as a result of heavy rainfall and surface water flooding are considered.	The TE2100 plan proposes improvements to the existing defence system for the first 60 years of the plan period (from 2010 to 2069). From 2070, rising sea levels will require a different approach to be taken, for which there are two options: Option 1.4 – a continuation of defence improvements including major improvements to the Thames Barrier, or Option 3.2 – a new downstream barrier at Long Reach. The best option will be selected in approximately 2050. Improvements to the existing defence system and a new downstream barrier will lead to habitat loss within Medway Estuary and Marshes SPA/Ramsar site and Thames Estuary and Marshes SPA/Ramsar.	Sea level rise could cause the loss of up to 1200 ha of designated intertidal habitat in the Thames Estuary Plan area over the next century. This has been identified through the Greater Thames Coastal Habitat Management Plan (CHaMP). The HRA screening assessment identified likely significant effects alone, and in combination, on Medway Estuary and Marshes SPA/Ramsar site and Thames Estuary and Marshes SPA/Ramsar site. The primary reason for this is that continuing with the current line of defences will mean that these sites are likely to suffer from coastal squeeze, where the inter-tidal habitat is squeezed out between the line of defences and rising sea levels.

⁵² Environment Agency, (2015); 'Water for Life and Livelihoods. River Basin Management Plan for the Thames River Basin District Habitats Regulations Assessment. Updated December 2015.'

⁵³ Environment Agency, (2012); 'Managing flood risk through London and the Thames estuary. TE2100 Plan. November 2012.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
		<p>The TE2100 plan was therefore subject to AA, which concluded that maintenance and improvement of the fixed defences is likely to lead to an adverse effect on integrity on the Medway Estuary and Marshes SPA/Ramsar site. No alternatives to the TE2100 plan were identified and Imperative Reasons for Overriding Public Interest (IROPI) tests have been applied. The TE2100 identifies opportunities for up to 1000 ha for potential intertidal habitat creation and 800 ha for potential freshwater habitat creation as compensation for habitat loss. The new habitat areas are as near as possible to those adversely affected; are suitable in terms of ecological features; and should be ready in time to provide the functions they are intended to compensate for.</p>
South East Water Water Resources Management Plan (WRMP) 2014 ⁵⁴		
<p>To set out how South East Water, in partnership with local communities, will secure water supplies for customers and stakeholders. The document proposes a range of supply and demand management activities, as well as schemes to develop and share new resources from 2015-2040.</p>	<p>EF-11 Water re-use at Aylesford proposes the transfer and discharge of treated effluent from Aylesford Water Treatment Works (WTW) into the River Medway in order to support increased abstraction by Southern Water at the Springfield intake in Maidstone. This option would also require the construction of a new effluent treatment plant at Aylesford WTW, a new pumping station, outfall (including a cascade) and a 6.6km long transfer main. This option could result in significant effects to Medway Estuary & Marshes SPA/Ramsar through non-toxic contamination and/or changes in water quality and quantity, either alone or in-combination with other plans or projects. This option could have in-combination effects with the Southern Water</p>	<p>An initial screening test was undertaken on a total of 136 options within a Feasible Options List. EF-11 (Aylesford water re-use at Aylesford) was screened in due to effluent discharge into the River Medway at East Barming, which although located in excess of 15km upstream, cannot be ruled out as having a significant effect on the Medway Estuary and Marshes SPA/Ramsar. The scheme is planned to be implemented for 2023. Due to the complexity of modelling or studies required to assess the significance of impacts associated with EF-11, a 'down the line' AA is proposed. In the event that no adverse effects on integrity cannot be concluded, South East Water commits to</p>

⁵⁴ South East Water, (2015); 'Our 2015-2040 Water Resources Management Plan.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
	WRMP options including licence variations and asset enhancement options in the Medway catchment. The Aylesford wastewater recycling scheme is effectively the same scheme undertaken by Southern Water.	bringing forward suitable alternatives, with all options subject to an HRA. TR-22/TR-22a was screened in due to the proximity of the proposed pipelines to North Downs Woodlands SAC and Queendown Warren SAC, but significant effects have been ruled out as the implementation of standard best practice guidelines and pollution prevention measures would be sufficient to ensure that the integrity of the respective sites is not adversely affected.
Southern Water WRMP 2014 ⁵⁵		
To set out how Southern Water proposes to ensure that there is sufficient security of water supplies to meet the anticipated demands of all its customers over the 25-year planning period from 2015 to 2040.	There are no relevant effects on European sites that could act in combination with the plan.	The HRA screening assessment did not identify any likely significant effects on European sites of relevance to this assessment ⁵⁶ .
Medway Estuary and Swale Shoreline Management Plan ⁵⁷		
This document 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. It identifies policies to manage coastal flood and erosion risks, deliver a wide ranging	Managed Realignment and Hold the Line Policies have the potential to result in freshwater habitat displacement and intertidal habitat growth.	The HRA screening assessment ⁵⁸ identified that the SMP would have a likely significant effect on the Ramsar sites / SPAs due to freshwater habitat displacement and intertidal habitat growth through Managed Realignment Policies. Based on the 2002 North Kent Coastal Habitat Management Plan (CHaMP) for the area, coastal squeeze was not considered a likely significant effect at the time of the stage 2 work.

⁵⁵ Southern Water, (2014); 'Water Resources Management Plan 2015–40.'

⁵⁶ Cascade, (2014); 'Southern Water Final Water Resources Management Plan Habitat Regulations Assessment - Stage 2 Appropriate Assessment.'

⁵⁷ Halcrow Group Limited, (2010); 'Medway Estuary and Swale SMP.'

⁵⁸ Environment Agency, (2008); 'Medway Estuary & Swale Shoreline Management Plan Appendix J Habitats Regulations Assessment.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
assessment of risks, opportunities, limits and areas of uncertainty.		<p>The AA identifies the following adverse effects</p> <ul style="list-style-type: none"> • Thames Estuary & Marshes SPA/Ramsar - hold the line policies have an adverse effect on through coastal squeeze of intertidal habitat alone; • Medway Estuary & Marshes SPA/Ramsar and The Swale SPA/Ramsar- managed realignment policies have an adverse effect on alone (through displacement of grazing marsh habitat) and in-combination (through displacement of grazing marsh and standing water habitats). <p>The assessment proceeded to a review of alternatives and it was determined that managed realignment with a controlled extent is the least damaging alternative and is therefore the approach adopted. The plan was considered necessary and passed the IROPI test. Grazing marsh and standing water compensation provisions were developed in partnership with Natural England, with the following habitat creation programme outlining cumulative areas:</p> <ul style="list-style-type: none"> • 0-20 years – Rank 1 North Swale 370ha • 20-50 years – Rank 2 South Swale 665ha • 50-100 years – Rank 3 Hoo St. Werberg 860ha <p>Should sufficient areas not be available within these sites, the Regional Habitat Creation Programme will secure investigate locations increasingly further afield until suitable sites are found.</p>

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
Isle of Grain to South Foreland Shoreline Management Plan Review 2010 ⁵⁹		
<p>The document 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. It identifies identify policies to manage coastal flood and erosion risks, deliver a wide ranging assessment of risks, opportunities, limits and areas of uncertainty.</p>	<p>Managed Realignment and Hold the Line Policies have the potential to result in freshwater habitat displacement and intertidal habitat growth.</p>	<p>The AA⁶⁰ identifies the following adverse effects:</p> <ul style="list-style-type: none"> Thames Estuary & Marshes SPA/ Ramsar – it is not possible to demonstrate that the SMP does not have an adverse effect alone due to the displacement of freshwater habitats. In combination, the Hold the Line policies in the adjacent Medway Estuary SMP2 have an adverse effect through coastal squeeze of intertidal habitat; and The Swale SPA / Ramsar - it is not possible to demonstrate that the SMP does not have an adverse effect alone due to the displacement of freshwater habitats. In combination, there is an adverse effect through displacement of grazing marsh and standing water habitat. <p>The assessment proceeded to a review of alternatives and it was determined that managed realignment with a controlled extent is the least damaging alternative and is therefore the approach adopted. The plan was considered necessary and passed the IROPI test. Grazing marsh and standing water compensation provisions were developed in partnership with Natural England, with the following habitat creation programme outlining cumulative areas:</p> <ul style="list-style-type: none"> Rank 1 South Swale – 665ha

⁵⁹ Halcrow Group Limited, (2010); 'Isle of Grain to South Foreland SMP Review 2010.'

⁶⁰ Halcrow Limited, (2009); 'Isle of Grain to South Foreland Shoreline Management Plan Appendix J: Habitats Regulations Assessment.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
		<ul style="list-style-type: none"> Rank 2 Possible additional sites within the Thames Estuary to be identified by the TE2100 programme – tbc <p>Should sufficient areas not be available within these sites, the RHCP will secure investigate locations increasingly further afield until suitable sites are found.</p>
Medway Local Transport Plan 2011-2026 ⁶¹		
<p>Set out the strategic policy for sustainable transport in Medway between 2011 and 2026. It aims to act as a mechanism to obtain funding to deliver transport improvement, and to unlock Medway's growth potential and address wider social, economic and environmental challenges for the area. The plan identifies the following long-term transport objectives:</p> <ul style="list-style-type: none"> Maintaining the cycleway infrastructure aims to contribute to improved air quality; Improving transport infrastructure capacity aims to reduce emissions from private car use by more efficient highway network; Improving public transport aims to reduce emissions by encouraging a modal shift from private car to bus; 	No likely significant effects have been identified.	Not applicable

⁶¹ Medway Council, (2011); 'Medway Local Transport Plan 2011-2026.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
<ul style="list-style-type: none"> Encouraging active travel and improving health aims to reduce emissions from private car use and encourage local interventions to improve air quality; and Improving travel safety aims to promote safe routes to school and therefore improved air quality. 		
Dartford Development Policies, 2017 ⁶²		
<p>The document is a key tool in achieving the Core Strategy's objectives. It sets out the scale of development needed in Medway for homes, jobs, retail land and supporting services and infrastructure, together with recognition of the area's important natural and historic environments.</p> <p>The Development Policies document builds on the spatial pattern of sustainable development identified in the Core Strategy⁶³ in the Priority Areas of Dartford Town Centre and Northern Gateway, Ebbsfleet to Stone and the Thames Waterfront (Policy CS1). Accordingly, the Development Policies</p>	<p>The plan provides policies outlining how development should take place within the Dartford Borough but contains no allocations for development. As such, no elements of the plan have been identified that have potential to cause in-combination effects.</p>	<p>The HRA⁶⁴ identifies no likely significant effects alone. However, likely significant effects were identified in combination with the Dartford Core Strategy given the scale and spatial distribution of residential development within 10km of European sites and the potential for recreational pressure as highlighted in recent research findings. However, it was considered that Policy DP25 within the plan addresses the potential for significant impacts and requires proposals for such developments to undertake an HRA. In addition the Council, with the help of consultants, is seeking to identify a strategic mitigation strategy which such proposals can apply in mitigating identified impacts.</p>

⁶² Dartford Borough Council, (2017); 'Dartford Development Policies Plan. Adopted July 2017. Dartford Local Plan Document.'

⁶³ Dartford Borough Council, (2011); 'Core Strategy - Proposed Adoption Document.'

⁶⁴ HRA Screening of the Dartford Borough Council Development Policies Plan Publication Version (December 2015).

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
support the capacity-based housing figure set out in the Core Strategy of up to 17,300 dwellings in the 20 years to 2026.		
Tonbridge and Malling Core Strategy 2007 and saved policies from the Local Plan		
<p>The adopted Local Development Framework (LDF) comprises the Core Strategy, saved policies from the Local Plan, Development Plan Allocations Development Plan Document (DPD), the Managing Development and the Environment DPD and the Tonbridge Central Area Action Plan.</p> <p>The Core Strategy sets out the Council's vision, aims and objectives which will determine the future pattern of development in the Borough over the period up until 2021 and the way in which the social, economic and environmental needs of the area can be delivered in the most sustainable way.</p>	<p>Policy CP15 supports an average rate of development of 425 dwellings per annum for the 2006-21 period; a total of 6,375 dwellings. In order to deliver the strategic development sites identified in policy CP15, accommodate predicted traffic growth, improve air quality and relieve sensitive areas from traffic congestion, new transport infrastructure will be needed. Peter's Pit and North Downs Woodlands SAC are sensitive to in-combination effects associated with this level of growth relating to:</p> <ul style="list-style-type: none"> • Increased traffic; • Increased air, noise and water pollution; • Increased pressure on abstraction levels and levels of effluents; and • Increased recreational activity. 	<p>The HRA identified no likely significant effects on Peter's Pit or North Downs Woodlands SAC.</p>
Tonbridge and Malling Development Land Allocations DPD 2008		
<p>This document lists, and specifically identifies on the Proposals Map, all development sites necessary to meet the needs of the area as identified in general terms in the Core Strategy. It identifies:</p>	<p>Potential in-combination effects are as highlighted above with respect to the Core Strategy.</p>	<p>The HRA reviewed previously in relation to the Core Strategy also addresses effects of the Development Land Allocations DPD and therefore no likely significant effects were identified.</p>

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
<ul style="list-style-type: none"> • Housing Sites in line with Core Policy CP15; • Major Developed Sites in the Green Belt pursuant to Core Policy CP14(f); • Sites for new employment development and existing employment areas to be safeguarded from alternative uses pursuant to Core Policy CP21; • The extent of the retail areas referred to in Core Policy CP22; and • Land safeguarded mainly for public authority uses including land required for highway and transport improvements pursuant to Core Policy CP26. 		
Tonbridge and Malling Managing Development and the Environment (MDE) DPD		
This DPD sets out the policy direction to 'manage' development so that environmental quality is maintained and enhanced whilst preserving a sense of place, as well as achieving the best balance between the built and natural environment. It deals with the protection and	The majority of policies are intended to control the environmental impacts of development and are therefore likely to have a beneficial impact on biodiversity and on protecting and enhancing natural habitats. However, therefore are some potential negative effects of the plan that could lead to in-combination effects, relating to:	The HRA screening report ⁶⁵ identified no likely significant negative effects on Peter's Pit and North Downs Woodlands SAC resulting from the policies in the MDE DPD. This is because mitigation measures within the MDE DPD, other higher tier planning documents and the legislative protection given to SACs meant that none of the effects were considered likely to be significant in

⁶⁵ Tony Fullwood Associates, (2009); 'Habitat Regulations Assessment of Tonbridge and Malling. Local Development Framework - Publication Version of Managing Development and the Environment. Screening Report. January 2009.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
enhancement of biodiversity including the creation of a multi-functional ecological network as well as the conservation and enhancement of the built and historic environment.	<ul style="list-style-type: none"> • Air quality impacts of transport developments; • Increased public access to natural green spaces; • Development in the countryside; • Increased pressure on water resources; and • Impact on woodlands. 	relation to the particular conservation objectives and environmental conditions of the European sites.
Bearing Fruits 2031 – The Swale Borough Local Plan, 2017		
<p>The Local Plan sets out the vision and overall strategy for Swale and how it will be achieved for the period 2014-2031. The plan aims to deliver:</p> <ul style="list-style-type: none"> • 776 dwellings per annum (13,192 for the plan period); • 130,000 sq.m of net additional 'B class' floorspace to meet the projected number of jobs. This would require some 60 ha of land. 	<p>The quantum of development located adjacent to and in close proximity to Medway Estuary & Marshes and The Swale SPA/Ramsar has potential to lead to a range of effects. There is also potential for in-combination effects on Queendown Warren, which is also located within the borough.</p> <p>Policy Regen 2 Queenborough and Rushenden: Regeneration Area relates to a site allocation for a regeneration area for residential, employment and community uses to achieve the integration of communities. The site provides for up to 1180 dwellings.</p> <p>Policy A 17: Iwade Expansion relates to a site allocation that is located immediately adjacent to the Swale SPA/Ramsar site. The site provides for 572 new dwellings.</p> <p>Policies A 1, MU 2, MU 4 and A 14 propose development adjacent to or within 100m of The Swale SPA/Ramsar</p>	<p>A series of HRA screening assessments were undertaken on various iterations of the emerging Swale Local Plan. Most relevant to the adopted plan was an HRA^{Error! Bookmark not defined.} on the Bearing Fruits 2031: The Swale Borough Local Plan Part 1: Submission Version 2014⁶⁶ and an HRA⁶⁷ on the Swale Local Plan Main Modifications 2016⁶⁸. Amendments were made to Local Plan policies to ensure that there is an adequate policy framework in place to enable the delivery of measures to protect European sites, either by requiring specific protection measures to be taken by allocated sites or by facilitating delivery of strategic initiatives on behalf of the Council. With these measures in place, it was concluded that an adequate policy framework is in place to ensure that the Local Plan will not lead to a likely significant effect on European sites either alone or in combination with other projects and plans.</p>

⁶⁶ Swale Borough Council, (2014); 'Bearing Fruits 2031: The Swale Borough Local Plan Part 1. Publication Plan December 2014.' Available at: http://swale-consult.limehouse.co.uk/portal/planning/lp_part_1/local_plan_part_1?pointId=3235702.

⁶⁷ AECOM, (2016); 'Habitats Regulations Assessment: Bearing Fruits 2031: The Swale Borough Local Plan: Proposed Main Modifications June 2016.'

⁶⁸ Swale Borough Council, (2016); 'Bearing Fruits 2031: The Swale Borough Local Plan Proposed Main Modifications June 2016.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
	<p>meaning that there is potential for disturbance to qualifying birds.</p> <p>Policy DM 17: Open space, sports and recreation provision requires the provision of recreational facilities with new development, including 'destination sites', which includes areas 'recognised for significant importance and biodiversity'.</p> <p>Potential impact pathways associated with these policies include:</p> <ul style="list-style-type: none"> • Recreational pressure, • Disturbance from construction and operational activities, • Loss of supporting habitat, • Impact pathways relating to surface runoff, and • Dust deposition. 	
Gravesham Local Plan Core Strategy, 2014 ⁶⁹		
To outline the key elements of the planning framework in Gravesham up to 2031. The vision, objectives and policies in this Core Strategy seek to meet the needs of the Borough in terms of providing homes, jobs and supporting facilities in a sustainable way. The plan makes allowance for:	There is potential for the level of development proposed in the Core Strategy to act in-combination with development proposed in surrounding areas to have significant effects on Medway Estuary & Marshes SPA/Ramsar, Thames Estuary & Marshes SPA/Ramsar and The Swale SPA/ Ramsar through increased recreational disturbance. The Core Strategy includes development in the north east of Gravesend, which is in close proximity to the Thames	The HRA AA ⁷⁰ and addendum ⁷¹ concluded that, as long as the recommendations outlined in the reports are incorporated, the Local Plan Core Strategy will not have adverse effects on the integrity of the identified European sites, either alone or in-combination.

⁶⁹ Gravesham Borough Council, (2014); 'Gravesham Local Plan Core Strategy. Adopted September 2014.'

⁷⁰ Enfusion, (2012); 'Gravesham Borough Council Local Plan Core Strategy – Proposed Submission. Habitats Regulations Assessment Report. December 2012.'

⁷¹ Enfusion, (2013); 'Gravesham Local Plan: Habitats Regulations Assessment. Habitats Regulations Assessment Addendum Report. Gravesham Core Strategy DPD. November 2013.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
<ul style="list-style-type: none"> 6,170 new dwellings; 24,290m² retail space; and 186,490m² employment floorspace. 	<p>Estuary and Marshes SPA & Ramsar. Policy 9: Culture and Tourism seeks to promote tourism, in particular the use of the River Thames.</p> <p>There is also potential for in-combination effects on these estuarine sites, in addition to North Downs Woodlands SAC, Peter's Pit SAC and Queendown Warren SAC, due to reduced water levels and quality, considering the level of development proposed.</p>	
Maidstone Borough Local Plan, 2017		
<p>The Maidstone Borough Local Plan aims to deliver sustainable growth and regeneration whilst protecting and enhancing the borough's natural and built asset. It covers the period from 2011 to 2031 and meets the following needs:</p> <ul style="list-style-type: none"> 17,660 dwellings (883 dwellings per annum) 6,100m² of convenience floorspace and 23,700m² comparison floorspace; and 208,030 m² employment floorspace within 37 hectares. 	<p>North Downs Woodlands SAC is sensitive to increased recreational pressure and air quality impacts associated with the Local Plan. Policy SP 2 (Maidstone urban area: north west strategic development location) provides for approximately 1,157 of the new dwellings to be located to the north west of Maidstone, within a potential catchment area that could contribute to increased recreational pressure within North Downs Woodlands SAC. Additional policies propose further contributions within this catchment, to the north east of Maidstone and within Maidstone urban area.</p>	<p>The HRA Screening Assessment⁷³ concluded that policies from the Local Plan – Publication (Regulation 19) February 2016 document can be screened out from further consideration both alone and in-combination with other projects or plans providing that recommendations are adhered to. This comprised strengthening of the wording of Policy DM3 to state that new development will not be acceptable if it is 'considered likely to have significant adverse effects' on international designations, rather than as currently states 'within or adjacent' to internationally designated sites. This recommendation has been incorporated into the Local Plan.</p>
Lower Thames Crossing		
<p>To enable sustainable local development and regional growth; provide a safer,</p>	<p>The Preferred Route (route 3 with a bored tunnel crossing of the River Thames and the Western Southern Link) has a</p>	<p>An HRA Screening Report and Appropriate Assessment Part 1⁷³ was produced in March 2016 to assess each of the</p>

⁷³ Highways England, (2016); 'Lower Thames Crossing. Pre-Consultation Scheme Assessment Report. Volume 6: Environmental Appraisal.'

Aims of the Document	Broad Review of Elements of the Plan that could cause 'In-combination' Effects	Conclusions of the HRA
faster, more reliable road that will improve the resilience of the wider road network and relieve the congested Dartford Crossing and approach roads; and to strengthen and connect local communities.	<p>potential to lead to the following significant effects that could act in-combination⁷²:</p> <ul style="list-style-type: none"> • North Woodlands Downs SAC - habitat fragmentation and reduced air quality; and • Thames Estuary and Marshes SPA/Ramsar – Loss of supporting habitats on the north side of the river, disturbance, reduced water quality and levels, reduced air quality. 	<p>shortlisted options at Location A for Route 1 (Dartford) and Location C for Routes 2, 3 and 4 (Gravesend), and also the crossing type (bridge, bored tunnel and immersed tube tunnel). This was then used to inform the route selection process and to provide a document that could be developed into the Appropriate Assessment. North Downs Woodlands SAC and Thames Estuary and Marshes SPA/Ramsar site were screened into the assessment. It was concluded that a bored tunnel at Location C represents the only viable alternative that meets the scheme objectives and for which there are a wider and more practical array of mitigation measures that would increase likelihood of compliance with the Habitats Directive.</p>

⁷² Highways England, (2017); 'Lower Thames Crossing. Scheme number HE540039. Environmental Impact Assessment Scoping Report.'

Appendix F

Air Quality Assessment Tables

F1 Nutrient Nitrogen Background Deposition Rates

European Site	Critical Load Class	Nitrogen Deposition (kg N/ha/yr)											
		2015			2023			2028			2035		
		Max	Min	Average	Max	Min	Average	Max	Min	Average	Max	Min	Average
Medway Estuary and Marshes SPA/Ramsar	Littoral Sediment	21.8	10.1	12.6	18.6	8.6	10.7	16.8	7.8	9.7	14.6	6.7	8.4
	Standing Open Water and Canals	14.7	7.1	10.3	12.5	6.1	8.8	11.3	5.5	7.9	9.8	4.8	6.9
Thames Estuary and Marshes SPA/Ramsar	Littoral Sediment	16.1	9.0	11.7	13.7	7.6	10.0	12.4	6.9	9.0	10.7	6.0	7.8
North Downs Woodlands SAC	Coniferous Woodland	26.7	22.8	24.4	22.7	19.4	20.8	20.6	17.5	18.8	17.9	15.2	16.3
	Beech Woodland	26.7	22.8	24.4	22.7	19.4	20.8	20.6	17.5	18.8	17.9	15.2	16.3
	Sub-Atlantic Semi-Dry Grassland	15.5	13.9	14.6	13.2	11.8	12.4	12.0	10.7	11.2	10.4	9.3	9.8

European Site	Critical Load Class	Nitrogen Deposition (kg N/ha/yr)											
		2015			2023			2028			2035		
		Max	Min	Average	Max	Min	Average	Max	Min	Average	Max	Min	Average
Peter's Pit SAC	Standing Open Water and Canals	12.5	12.5	12.5	10.6	10.6	10.6	9.6	9.6	9.6	8.3	8.3	8.3

F2 Background NO_x and NO₂ Concentrations

Receptor	Easting	Northing	Local Authority	2023 Background Concentrations (µg/m ³)		2028 Background Concentrations (µg/m ³)		2035 Background Concentrations (µg/m ³)	
				NO _x	NO ₂	NO _x	NO ₂	NO _x	NO ₂
Medway Estuary and Marshes SPA/Ramsar	584492	175603	Medway	15.1	11.1	14.2	10.5	14.0	10.4
Thames Estuary and Marshes SPA/Ramsar	584492	175603	Medway	15.1	11.1	14.2	10.5	14.0	10.4
North Downs Woodlands SAC - Wouldham to Detling Escarpment SSSI East	579400	158446	Maidstone	15.9	11.9	13.4	10.1	12.7	9.6
North Downs Woodlands SAC - Wouldham to Detling Escarpment SSSI West	575308	160257	Maidstone	16.7	12.3	14.4	10.7	13.8	10.3
North Downs Woodlands SAC - Halling to Trottiscliffe Escarpment SSSI East	568634	163016	Tonbridge and Malling	10.8	8.2	9.4	7.2	9.1	7.0
Peter's Pit SAC	571372	162687	Tonbridge and Malling	12.9	9.7	11.4	8.6	11.0	8.3

F3 Nitrogen Deposition Results

Habitat	Lower Critical Load (kgN/ha/yr)	Upper Critical Load (kgN/ha/yr)	Background N Deposition (kgN/ha/yr)	With Scenario PC (kgN/ha/yr)	Change in PC (With Scenario – ref. Case) kgN/ha/yr	PC as % of Lower Critical Load	With Scenario PEDR (kgN/ha/yr)	PEDR as % of lower Critical Load	PEDR as % of Upper Critical Load
Medway Estuary and Marshes SPA/Ramsar, 2035, Scenario 3									
Standing Open Water and Canals	3	30	6.9	2.7	1.2	39.8%	9.5	317%	32%
Littoral Sediment	3	30	8.4	2.7	1.2	39.8%	11.1	370%	37%
Thames Estuary and Marshes SPA/Ramsar, 2035, Scenario 3									
Littoral Sediment	8	30	8.4	2.7	1.2	15%	11.1	139%	37%
North Downs Woodlands SAC Wouldham to Detling Escarpment SSSI (East), 2023, Scenario 1									
Coniferous Woodland	5	15	20.8	7.7	0.07	1.3%	28.5	570%	190%
Beech Woodlands	10	20	20.8	7.7	0.07	0.7%	28.5	285%	143%
Semi-dry Atlantic Grassland	15	25	12.4	3.9	0.03	0.2%	16.3	109%	65%
North Downs Woodlands SAC Wouldham to Detling Escarpment SSSI (West), 2023, Scenario 1									
Coniferous Woodland	5	15	20.8	3.8	0.01	0.2%	24.6	492%	164%

Habitat	Lower Critical Load (kgN/ha/yr)	Upper Critical Load (kgN/ha/yr)	Background N Deposition (kgN/ha/yr)	With Scenario PC (kgN/ha/yr)	Change in PC (With Scenario – ref. Case) kgN/ha/yr	PC as % of Lower Critical Load	With Scenario PEDR (kgN/ha/yr)	PEDR as % of lower Critical Load	PEDR as % of Upper Critical Load
Beech Woodlands	10	20	20.8	3.8	0.01	0.1%	24.6	246%	123%
Semi-dry Atlantic Grassland	15	25	12.4	1.9	<0.01	0.1%	14.3	95%	57%
North Downs Woodlands Wouldham to Detling Escarpment SSSI (East), 2028, Scenario 3									
Coniferous Woodland	5	15	18.8	4.3	0.07	1.3%	23.1	462%	154%
Beech woodlands	10	20	18.8	4.3	0.07	0.7%	23.1	231%	116%
Semi-dry Atlantic Grassland	15	25	11.2	2.2	0.03	0.7%	13.4	89%	54%
North Downs Woodlands Wouldham to Detling Escarpment SSSI (West), 2028, Scenario 3									
Coniferous Woodland	5	15	18.8	0.3	0.01	0.2%	19.1	381%	127%
Beech woodlands	10	20	18.8	0.3	0.01	0.2%	19.1	191%	95.5%
Semi-dry Atlantic Grassland	15	25	11.2	0.1	<0.01	0.1%	11.4	76%	46%
North Downs Woodland SAC Halling to Trottscliffe Escarpment SSSI, 2028, Scenario 3									

Habitat	Lower Critical Load (kgN/ha/yr)	Upper Critical Load (kgN/ha/yr)	Background N Deposition (kgN/ha/yr)	With Scenario PC (kgN/ha/yr)	Change in PC (With Scenario – ref. Case) kgN/ha/yr	PC as % of Lower Critical Load	With Scenario PEDR (kgN/ha/yr)	PEDR as % of lower Critical Load	PEDR as % of Upper Critical Load
Coniferous Woodland	5	15	18.8	0.01	<0.01	0.1%	18.8	376%	125%
Beech woodlands	10	20	18.8	0.01	<0.01	0.1%	18.8	188%	94%
Semi-dry Atlantic Grassland	15	25	11.2	<0.01	<0.01	<0.1%	11.2	75%	45%
Peter's Pit SAC, 2035, Scenario 4									
Standing open water and canals	3	10	8.3	0.2	0.04	1.3%	8.5	282%	85%

F4 APIS Results

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
Medway Estuary and Marshes SPA/Ramsar	<i>Sterna hirundo</i> - common tern	Yes	Supralittoral sediment - Coastal stable dune grasslands (acidic)	8 to 10	21.84	10.08	12.63	Increase tall grasses, decrease prostrate plants, increased N leaching, soil acidification, loss of typical lichen species	Potential negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply.
			Supralittoral sediment - Coastal stable dune grasslands (calcareous)	10 to 15	21.84	10.08	12.63		
			Supralittoral sediment - shifting coastal dunes	10 to 20	14.7	7.14	10.29	Biomass Increase, increase N leaching	Potential negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply.

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
			Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	21.84	10.08	12.63		
	<i>Sterna albifrons</i> - little tern	Yes	Supralittoral sediment - Coastal stable dune grasslands (acidic)	8 to 10	21.84	10.08	12.63	Increase tall grasses, decrease prostrate plants, increased N leaching, soil acidification, loss of typical lichen species	Potential negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply.
			Supralittoral sediment - Coastal stable dune grasslands (calcareous)	10 to 15	21.84	10.08	12.63		

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
			Supralittoral sediment - shifting coastal dunes	10 to 20	21.84	10.08	12.63	Biomass Increase, increase N leaching	Potential negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply.
	<i>Circus cyaneus</i> - hen harrier	Yes	Dwarf shrub heath (Northern wet heath)	10 to 20	21.84	10.08	12.63	Decrease heather dominance, decline in lichens and mosses, increase N leaching	No expected negative impact on species due to impacts on the species broad habitat.
			Fen, marsh and swamp (Rich Fens)	15 to 30	21.84	10.08	12.63	Increase in tall graminoids, decrease in bryophytes	
			Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Falco columbaris</i> - merlin	Yes	Dwarf shrub heath (dry Heaths)	10 to 20	21.84	10.08	12.63	Transition from heather to grass dominance, decline in lichens, changes in plant biochemistry, increased sensitivity to abiotic stress.	No expected negative impact on species due to impacts on the species broad habitat.
			Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	
	<i>Asio flammeus</i> - short eared owl	Yes	Dwarf shrub heath (Northern wet heath)	10 to 20	21.84	10.08	12.63	Decrease heather dominance, decline in lichens and mosses, increase N leaching	No expected negative impact on species due to impacts on the species broad habitat.

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Podiceps cristatus</i> - Great crested Grebe	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	Potential negative impact on species due to impacts on the species broad habitat
			Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		
	<i>Branta bernicla bernicla</i> - Dark bellied brent goose	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	Potential negative impact on species due to impacts on the species broad habitat

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Tadorn tadorna</i> - common shelduck	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat.
	<i>Anas penelope</i> - Eurasian widgeon	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	Potential negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply.
			Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Anas crecca</i> - Eurasian teal	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply
			Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		
	<i>Anas platyrhynchos</i> - mallard	Yes	littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
			Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		
	<i>Anas acuta</i> - Northern pintail	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply
			Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Aythya ferina</i> - common pochard	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply
			Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Haematopus ostralegus</i> - Eurasian oystercatcher	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply
	<i>Recurvirostra avosetta</i> - pied avocet	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	Potential negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply.

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Charadrius hiaticula</i> - ringed plover	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply
	<i>Pluvialis squatarola</i> - grey plover	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Calidris canutus</i> - red knot	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply
	<i>Calidris alpina alpina</i> - Dunlin	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat
	<i>Limosa limosa islandica</i> - Black tailed godwit	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	Potential negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply.

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Numenius arquata</i> - Eurasian curlew	Yes	Neutral grassland (low and medium altitude hay meadows)	20 to 30	21.84	10.08	12.63	Increase in tall grasses, decrease in diversity	Potential negative impact on species due to impacts on the species' broad habitat.
			Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	Potential negative impact on species due to impacts on the species broad habitat
	<i>Tringa totanus</i> - common redshank	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Tringa nebularia</i> - common geenshank	Yes	littoral sediment (Pioneer, low-mid, mid-upper saltmarshes	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply
	<i>Arenaria interpres</i> - ruddy turnstone	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes	20 to 30	21.84	10.08	12.63	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply
	<i>Gavia stellata</i> - Red-throated diver	No							

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Phalacrocorax carbo</i> - Great cormorant	Yes	Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		
	<i>Cygnus columbianus bewickii</i> - Tundra swan	Yes	Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		
	<i>Anas clypeata</i> - Northern shoveler	Yes	Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Alcedo atthis</i> - Common kingfisher	Yes	Standing open water and canals (permanent dystrophic lakes, ponds and pools)	3 to 10	14.7	7.14	10.29		
Thames Estuary and Marshes SPA/Ramsar	<i>Charadrius hiaticula</i> - ringed plover	Yes	Supralittoral sediment (Coastal stable due grasslands acidic)	8 to 10	16.1	8.96	11.7	Increase tall grasses, decrease prostrate plants, increased N leaching, soil acidification, loss of typical lichen species	Potential positive impact on species due to impacts on the species' food supply.
			Supralittoral sediment (shifting coastal dune)	10 to 20	16.1	8.96	11.7	Biomass increase, increase N leaching	Potential positive impact on species due to impacts on the species' food supply.
			Supralittoral sediment (Coastal stable dune grasslands calcareous)	10 to 15	16.1	8.96	11.7	Increase tall grasses, decrease prostrate plants, increased N leaching, soil acidification, loss of typical lichen species	Potential positive impact on species due to impacts on the species' food supply.

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Circus cyaneus</i> - hen harrier	Yes	Dwarf shrub heath (Northern wet heath)	10 to 20	16.1	8.96	11.7	Decrease heather dominance, decline in lichens and mosses, increase N leaching	No expected negative impact on species due to impacts on the species broad habitat.
			Fen, marsh and swamp (Rich Fens)	15 to 30	16.1	8.96	11.7	Increase in tall graminoids, decrease in bryophytes	
			Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	16.1	8.96	11.7	Increase late successional species, increase productivity, increase in dominance of graminoids	
	<i>Recurvirostra avosetta</i> - pied avocet	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	16.1	8.96	11.7	Increase late successional species, increase productivity, increase in dominance of graminoids	Potential negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply.

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Pluvialis squatarola</i> - grey plover	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	16.1	8.96	11.7	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply
	<i>Calidris canutus</i> - Red knot	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	16.1	8.96	11.7	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
	<i>Calidris alpina alpina</i> - Dunlin	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	16.1	8.96	11.7	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat
	<i>Limosa limosa islandica</i> - Black tailed godwit	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	16.1	8.96	11.7	Increase late successional species, increase productivity, increase in dominance of graminoids	Potential negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply.
	<i>Tringa totanus</i> - common redshank	Yes	Littoral sediment (Pioneer, low-mid, mid-upper saltmarshes)	20 to 30	16.1	8.96	11.7	Increase late successional species, increase productivity, increase in dominance of graminoids	No expected negative impact on species due to impacts on the species broad habitat/Potential positive impact on species due to impacts on the species' food supply

Site	Site Features (in Sensitivity Order - High to Low)	Habitat Sensitive to N	Relevant N Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Nitrogen Deposition (kg N/ha/yr)			Exceedance Impacts	Other Notes
					Max	Min	Average		
North Downs Woodlands SAC	<i>Taxus baccata</i> woods of the British Isles	Yes	Coniferous Woodland	5 to 15	26.74	22.82	24.43	Changes in soil processes, nutrient imbalance, altered composition mycorrhiza and ground vegetation	
	Asperulo-Fagetum beech forests	Yes	<i>Fagus</i> Woodland	10 to 20	26.74	22.82	24.43	Changes in ground vegetation and mycorrhiza, nutrient imbalance, changes soil fauna	
	Semi-natural dry grasslands and scrubland facies on calcareous substrates *important orchid sites	Yes	Sub-atlantic semi-dry calcareous grassland	15 to 25	15.54	13.86	14.62	Increase in tall grasses, decline in diversity, increased mineralization, N leaching; surface acidification.	
Peter's Pit SAC	Species - Great Crested Newt, Habitat - Standing open water and canals	Yes	Permanent dystrophic lakes, ponds and pools	3 to 10	12.46	12.46	12.46		