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Venue: Cozenton Park Sports Centre, Bloors Lane, Rainham, Kent, ME8 7EG

Items

5.	Medway Local Plan Regulation 18 Consultation	
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Appendices 4, 5 and 6 are attached.

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Date: 5 July 2024

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Habitats Regulations Assessment of the Medway Local Plan

Regulation 18

June 2024





Appendix 4



Habitats Regulations Assessment of the Medway Local Plan

Regulation 18 Consultation

Habitats Regulations Assessment Report

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Acronyms & abbreviations

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
ALS	Abstraction License Strategy
CAMS	Catchment Abstraction Management Strategy
CEcIA	Cumulative Ecological Impact Assessment
CIEEM	Chartered Institute of Ecology and Environmental Management
dB	Decibel
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley and Associates
GI	Green Infrastructure
HDV	Heavy Duty Vehicle
HRA	Habitats Regulations Assessment
IAQM	Institute of Air Quality Management
IROPI	Imperative Reasons of Overriding Public Interest
IRZ	Impact Risk Zone
IUCN	International Union for Conservation of Nature
JNCC	Joint Nature Conservation Committee
LNR	Local Nature Reserve
LPA	Local Planning Authority
LSE	Likely Significant Effect
LWS	Local Wildlife Site
MEASS	Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy
MLP	Medway Local Plan
Nox	Nitrogen Oxides
PCSO	Police Community Support Officer
RMBP	River Management Basin Plan
SAC	Special Area of Conservation
SAMMS	Strategic Access Management and Monitoring Strategy
SIP	Site Improvement Plan
SPA	Special Protection Area
SPZ	Source Protection Zone

SSSI	Site of Special Scientific Interest	
SWMC	Surface Water Management Catchment	
TIDE	Tidal River Development	
WFD	Water Framework Directive	
WRMP	Water Resource Management Plan	
WRZ	Water Resource Zone	
WwTWs	Wastewater Treatment Works	
ZoI	Zone of Influence	

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1 Introduction

1.1 Background

- 1.1.1 Medway Council is preparing a new local plan to set the framework for the area's growth up to 2041. The Local Plan will provide a framework for where and how new development can take place.
- 1.1.2 Lepus Consulting has prepared this report to inform the Habitats Regulations Assessment (HRA) of the Medway Local Plan (referred to hereafter as the 'MLP') on behalf of Medway Council.
- 1.1.3 The MLP will cover the urban conurbation which extends across the five historic towns of Medway (Strood, Rochester Chatham, Gillingham and Rainham) and the surrounding network of villages on the Hoo Peninsula and within the Medway Valley. This area is referred to hereafter as the 'Plan area' and is illustrated in **Figure 1.1**.

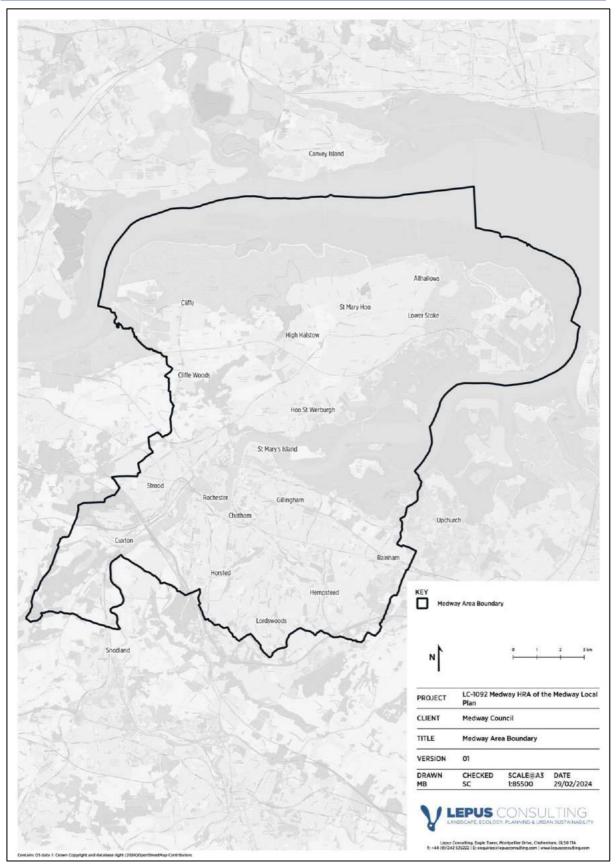


Figure 1.1: Medway Local Plan area

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1.2 Habitats Regulations Assessment

- 1.2.1 The application of HRA to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)¹. HRA applies to plans and projects, including all Local Development Documents in England and Wales.
- 1.2.2 Where a plan is likely to have a significant effect on a European site (either alone or incombination) and is not directly connected with or necessary to the management of the European site, Regulation 105 of the Habitats Regulations notes that the plan making authority for that plan must, before the plan is given effect, make an Appropriate Assessment (AA) of the implications for the site in view of that site's conservation objectives. These tests are referred to collectively as a Habitats Regulations Assessment (HRA).
- 1.2.3 The most effective way to deliver the outputs of HRA is to ensure that it is incorporated into the plan-making process as early as possible. This allows for adverse impacts to be avoided in the first instance through the strategic planning of options or, where this is not possible, effective mitigation. Mitigation measures can then be designed to avoid, cancel, or reduce significant effects following the mitigation hierarchy. Such measures may take the form of guiding principles and policy requirements, drawing on existing best practice. Should mitigation not be possible, there may be a need to consider alternatives which may require some more complex changes to a plan.
- 1.2.4 The Habitats Regulations² provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive. In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site³:
 - A potential SPA (pSPA)
 - A possible / proposed SAC (pSAC)
 - Listed and proposed Ramsar Sites (wetland of international importance)
 - In England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPA, pSAC, and listed or proposed Ramsar sites.

¹ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

² Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

³ Department for Levelling up, Housing and Communities & Local Government (2023). National Planning Policy Framework. Para 187.

1.3 Previous HRA work

- 1.3.1 In October 2023 the Council sought views on the direction of the new MLP through a Regulation 18 consultation; 'Setting the Direction for Medway 2040'⁴, which did not detail policies or identify sites for new development. The consultation was supported by a preliminary HRA which identified impact pathways at European sites and provided a preliminary high-level screening of the issues considered and recommendations to inform future policies⁵. The preliminary HRA identified possible impacts at the following European sites:
 - Medway Estuary and Marshes SPA and Medway Estuary and Marshes Ramsar (air pollution, water quality and quantity, habitat loss, degradation and fragmentation, recreational effects, urbanisation effects and coastal squeeze)
 - Thames Estuary and Marshes SPA and Thames Estuary and Marshes Ramsar (air pollution, water quality and quantity, habitat loss, degradation and fragmentation, recreational effects, urbanisation effects and coastal squeeze)
 - The Swale SPA and Swale Ramsar (air pollution, water quality and quantity and habitat loss, degradation and fragmentation)
 - North Downs Woodlands SAC (air quality, recreational effects and urbanisation effects and habitat loss, degradation and fragmentation)
- 1.3.2 Natural England was consulted on the preliminary HRA and welcomed the consideration of issues set out in the HRA report⁶.

1.4 Purpose of this report

- 1.4.1 The purpose of this report is to provide HRA guidance and advice to the Council at the early stages of the MLP preparation and provide an assessment of the Regulation 18b 2024 version of the MLP. This Regulation 18 HRA report aims to identify (or scope) those European sites that will be considered in the HRA process through application of a 'source-pathway-receptor' model. In addition, key constraints and opportunities at European sites and likely impact pathways from the MLP are set out. This report outlines HRA methodologies that will be taken forward alongside development of the MLP and the key issues for consideration. It also provides screening, and where information allows, a preliminary AA of the MLP Regulation 18 Consultation and recommendations to inform the Plan's development.
- 1.4.2 This HRA report has been prepared in accordance with the Habitats Regulations and has been informed by the following guidance:
 - Planning Practice Guidance: Appropriate Assessment⁷

⁴ Medway Council (September 2023) Medway Local Plan 2022 – 2040. Regulation 18 Consultation. Setting the Direction for Medway 2040.

⁵ Lepus Consulting (September 2023) Regulation 18: Setting the Direction for Medway 2040. Preliminary HRA Report.

⁶ Natural England (2023) Medway Local Plan Regulation 18 Consultation. 31 October 2023. [Letter].

⁷ Department for Levelling up, Housing and Communities and Ministry of Housing Communities & Local Government (2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

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• The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: 'Practical Guidance for the Assessment of Plans under the Regulations')

2 Methodology

2.1 Overview

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

 $[\]textcircled{\mbox{\sc c}}$ Lepus Consulting for Medway Council

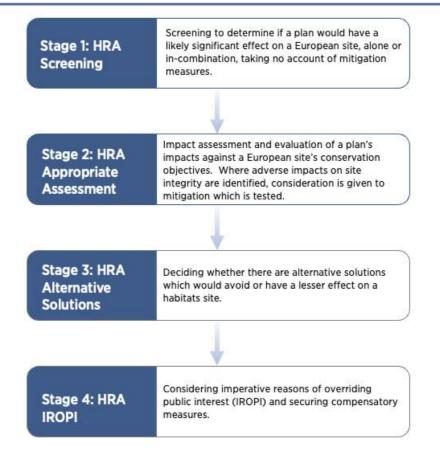


Figure 2.1: Stages in the Habitats Regulations Assessment process⁸

2.2 Stage 1: Screening for Likely Significant Effects

- 2.2.1 The first stage in the HRA process comprises the screening stage (see Figure 2.1). The purpose of the screening process is to firstly determine whether a plan is either (1) exempt (because it is directly connected with or necessary to the management of a European site), (2) whether it can be excluded (because it is not a plan), or (3) eliminated (because there would be no conceivable effects), from the HRA process. If none of these conditions apply, it is next necessary to identify whether there are any aspects of the plan which may lead to a Likely Significant Effect (LSE) at a European site, either alone or in-combination with other plans or projects.
- 2.2.2 Where elements of the MLP will not result in LSEs on a European site (alone or incombination) these are screened out and are not considered in further detail in the process. Where LSEs are identified, the HRA process moves to an AA of LSEs (Stage 2 -**Figure 2.1**).
- 2.2.3 Evaluation codes have been used to summarise whether or not each component of the MLP is likely to have an LSEs alone or in-combination. These codes are subsequently used to inform the formal screening decision (Column 2, **Table 2.1**). The results are presented in **Chapter 4** of this report.

⁸Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (January) (2021) edition UK: DTA Publications Limited.

Table 2.1: Screening evaluation and	reasoning categories from	Part F of the DTA Handbook ⁹
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	ening evaluation and reasoning categories from Chapter F of the Habitats Ilations Assessment Handbook (DTA Publications, 2013):	Screen in / Screen out
Α.	General statements of policy / general aspirations	Screen Out
В.	Policies listing general criteria for testing the acceptability / sustainability of proposals.	Screen Out
C.	Proposal referred to but not proposed by the Plan.	Screen Out
D.	General plan-wide environmental protection / designated site safeguarding / threshold policies.	Screen Out
E.	Policies or proposals that steer change in such a way as to protect European sites from adverse effects.	Screen Out
F.	Policies or proposals that cannot lead to development or other change.	Screen Out
G.	Policies or proposals that could not have any conceivable or adverse effect on a site.	Screen Out
Н.	Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects).	Screen Out
I.	Policies or proposals with a Likely Significant Effect on a site alone.	Screen In
J.	Policies or proposals unlikely to have a significant effect alone.	Screen Out
K.	Policies or proposals unlikely to have a significant effect either alone or in- combination.	Screen Out
L.	Policies or proposals which might be likely to have a significant effect in- combination.	Screen In
М.	Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.	Screen In

2.3 In-combination effects

- 2.3.1 Should screening conclude there are no LSEs from the MLP alone, it is necessary to then consider whether the effects of the MLP in-combination with other plans and projects would combine to result in an LSE on any European site. It may be that the MLP alone will not have an LSE but could have a residual effect which may contribute to in-combination LSEs on a European site.
- 2.3.2 The following Local Planning Authority (LPA) local development plans have been considered in the HRA process:
 - Maidstone Borough Council¹⁰
 - Gravesham Borough Council^{11,12}

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⁹ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (December) (2019) edition UK: DTA Publications Limited. Available at: http://www.dtapublications.co.uk/ [Date accessed: 10/01/24]

¹⁰ Maidstone Borough Council (March 2024) The Maidstone Borough Local Plan Review 2021-2038.

¹¹ Gravesham Borough Council (September 2014) Gravesham Local Plan Core Strategy and Local Plan Policies Map.

¹² Gravesham Borough Council (2018) Gravesham Local Plan Regulation 18 Part 1 Consultation Part 1 Site Allocations: Issues and Options and Part 2 Development Management Policies Document.

•

- Swale Borough Council^{13,14}
- Tonbridge and Malling Borough Council^{15,16}
- Dartford Borough Council¹⁷
- Thurrock Council^{18,19}
- Castle Point Borough Council^{20,21}
- Southend-on-Sea Borough Council^{22,23}
- 2.3.3 This HRA has drawn on HRA work undertaken to support the preparation of these local plans. Alongside these local development plans, consideration has also been given to topic specific plans and projects including the Kent Minerals and Waste Plan²⁴, Kent Local Transport Plan²⁵ and relevant river basin and water resource management plans. Consideration has also been given to in-combination effects with the Lower Thames Crossing.

2.4 Stage 2: Appropriate Assessment and Integrity Test

- 2.4.1 Stage 2 of the HRA process comprises the AA and Integrity Test. The purpose of the AA is to undertake an assessment of the implications of a plan for a European site in light of its conservation objectives²⁶.
- 2.4.2 As part of this process, plan makers should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation and they should consult interested parties on the possible ways of managing the risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on European sites. Mitigation measures may take the form of policies within the MLP, or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate the adverse effects for which they are targeted.

¹³ Swale Borough Council (2017) Bearing Fruits 2031 The Swale Borough Local Plan.

¹⁴ Swale Borough Council (2021) Swale Borough Council Local Plan October 2021.

¹⁵ Tonbridge and Malling Borough Council (2007) Core Strategy and (2008) Development Land Allocations.

¹⁶ Tonbridge and Malling Borough Council (2022) Regulation 18 Local Plan.

¹⁷ Dartford Borough Council (2024) The Dartford Plan Dartford Borough's Local Plan to 2037.

¹⁸ Thurrock Council (2015) Thurrock Local Development Framework. Core Strategy and Policies for Development Management.

¹⁹ Thurrock Council (2023) Creating Successful Places. Local Plan Initial Proposals Document.

²⁰ Castle Point Borough Council (1998) Local Plan.

²¹ Castle Point Borough Council (2023) Castle Point Plan. Engagement Report.

²² Southend-on-Sea Borough Council (2021) Core Strategy and (2015) Development Management Document.

²³ Southend-on-Sea Borough Council (2021) Consultation 2 Refining the Plan Options.

²⁴ Kent County Council (2020) Kent Minerals and Waste Local Plan 2013 – 30.

²⁵ Kent County Council (2016) Local Transport Plan 4: Delivering Growth without Gridlock 2016 - 2031.

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

2.4.3 The preliminary AA aims to present information in respect of all aspects of the MLP and ways in which it could, either alone or in-combination with other plans and projects, impact a European site. The Council (as the Competent Authority) must then ascertain, based on the findings of the AA, whether the MLP will adversely affect the integrity of a European site either alone or in-combination with other plans and projects. This is referred to as the Integrity Test.

2.5 Dealing with uncertainty

- 2.5.1 Uncertainty is an inherent characteristic of HRA, and decisions can be made using currently available and relevant information. This concept is reinforced on the 7^{th of} September 2004 'Waddenzee' ruling²⁷:
- 2.5.2 'However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead, it is clear from the second sentence of Article 6(3) of the Habitats Directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the Appropriate Assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty'.

2.6 The Precautionary Principle

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

²⁷EC Case C-127/02 Reference for a Preliminary Ruling 'Waddenzee' 7th September 2004 Advocate General's Opinion (para 107).

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3 Scoping of Threats and Pressures at European Sites

3.1 Introduction

3.1.1 An important initial stage of the screening process is gathering information on European sites which may be affected by the MLP. This is informally known as scoping and provides an understanding of potential impact pathways from the MLP and connections to European sites and their vulnerabilities. This information is then used to inform the screening assessment (**Chapter 4**). This chapter therefore scopes which European sites will be considered in the HRA process and their associated vulnerabilities in the context of potential impacts from the MLP.

3.2 Identification of a HRA study area

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

3.3 Scoping impact pathways

- 3.3.1 Threats and pressures to which European sites are vulnerable have been identified through reference to data held by the JNCC and Natural England and through reference to Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each European site and is summarised in **Appendix A**.
- 3.3.2 Supplementary advice notices prepared by Natural England often provide more recent information on threats and pressures upon European sites than SIPs and have therefore also been reviewed. A number of threats and pressures are unlikely to be exacerbated by the MLP and have therefore not been considered.
- 3.3.3 Based on a review of the HRA work undertaken to support previous phases of the MLP review, including the 2023 Preliminary HRA Report, neighbouring LPA HRAs and local knowledge, the potential impact pathways listed below are considered to be within the scope of influence of the MLP.
- 3.3.4 Land use planning has the potential to lead to direct impacts upon European sites through the mechanisms listed below. It also has the potential to result in impacts upon qualifying features when located outside a designation boundary, known as functionally linked land²⁸. The HRA therefore also considers effects upon functionally linked land or mobile species within the following topic assessments.
 - **Air pollution:** Land use planning has the potential to increase atmospheric emissions of pollutants to the air. These can result in adverse effects at European sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)²⁹.
 - **Water resources and water levels:** Urban development can change run off rates from urbanised areas to European sites or watercourses which run through them. An increase in housing provision can also influence supply and demand for water within the region which may impact water levels.
 - **Water quality:** Surface water run-off from urban areas has the potential to reduce the quality of water entering a catchment. Water quality may also be reduced through point source effluent discharges from new development at Wastewater Treatment Works (WwTWs) and other controlled discharge sources. Changes in water quality also have the potential to affect functionally linked land (land or watercourses outside a designated site boundary).
 - **Recreational pressure:** New housing development has the potential to increase recreational pressure upon European sites which are accessible to the public.

²⁹ APIS (2016) Ecosystem Services and air pollution impacts.

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²⁸ "The term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore 'linked' to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status". Source: Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

- **Urbanisation effects:** Urban development has the potential to result in disturbing activities (such as noise, lighting, cat predation and visual disturbance). Disturbance effects may impact upon European sites themselves and also their qualifying features when outside a designated site boundary. It may also result in the fragmentation of connecting habitats and corridors which could hinder the movement of mobile qualifying species when located outside a designated site boundary.
- Coastal squeeze: Given the location of the Plan area and the coastal nature of adjacent European sites, increased development has the potential to result in a loss of these natural European when considered alongside sea level rise.

3.4 Scoping European sites

- 3.4.1 Based on a review of HRA work undertaken to date and local knowledge, the following European sites are considered to be within the scope of influence of the MLP:
 - Medway Estuary and Marshes SPA and Ramsar
 - Thames Estuary and Marshes SPA and Ramsar
 - Swale SPA and Ramsar
 - North Downs Woodlands SAC
 - Peter's Pit SAC
 - Queendown Warren SAC
- 3.4.2 The North Kent Estuary and Marshes SPA and Ramsar designations include areas of wetland, marsh and intertidal habitat which run along the North Kent coast, encompassing the Thames, Medway and Swale estuaries and form a contiguous stretch of coastal habitat, known as the North Kent Marshes. These areas are designated as SPAs, and Ramsar sites due to their wetlands of international importance and include the Medway Estuary and Marshes SPA and Ramsar, the Thames Estuary and Marshes SPA and Ramsar. These European sites are designated due to their importance for wintering waterfowl, breeding waterfowl, breeding and wintering raptors and a range of rare plants and invertebrate species³⁰. The bird species for which these sites are designated are listed in **Appendix A** and it is likely that these birds move between these designations.
- 3.4.3 The Thames Estuary is the furthest west of these designated sites and extends predominantly along the south side of the River Thames, with a small area along its northern shore. Research undertaken by Natural England³¹ notes that the area to the south of the river comprises brackish grazing marsh, some of which has been converted to arable use, with flooded clay pits at Cliffe which have been filled with dredgings. In addition, there is a small extent of salt marsh and broad intertidal mud-flats outside the sea wall.

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

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

- 3.4.4 From west to east the next designated site along the coast comprises the Medway Estuary and Marshes SPA and Ramsar. This area is located on both the northern and southern banks of the Medway Estuary and forms a single tidal system with the Swale. It joins the Thames Estuary between the Isle of Grain and Sheerness. It consists of a complex arrangement of tidal channels, which drain around large islands of saltmarsh and peninsulas of grazing marsh. The mud-flats are rich in invertebrates and also support beds of *Enteromorpha* and some Eelgrass *Zostera spp.* Small shell beaches occur, particularly in the outer part of the estuary. Grazing marshes are present inside the sea walls around the estuary³². The complex and diverse mixes of coastal habitats support important numbers of waterbirds throughout the year. In summer, the estuary supports breeding waders and terns, whilst in winter it holds important numbers of geese, ducks, grebes and waders. The site is also of importance during spring and autumn migration periods, especially for waders³³.
- 3.4.5 The Swale lies furthest to the east between the Isle of Sheppey and the Kent Mainland, joining the Medway Estuary to the west. Research undertaken by Natural England³⁴ notes that the estuary comprises a complex of brackish and freshwater floodplain grazing marshes with ditches and intertidal salt marshes and mud-flats. The intertidal habitat supports invertebrate fauna and algae and eelgrass, with large mussel beds locally on harder areas of substrate.
- 3.4.6 The North Downs Woodlands SAC consists of mature Beech (Fagus sylvatica) forests and Yew (Taxus baccata) woods on steep slopes. These woodland stands lie within a mosaic of scrub, other woodland types and areas of unimproved grassland on thin chalk soils³⁵.
- 3.4.7 Peter's Pit SAC comprises an old chalk quarry situated in the North Downs with adjoining soil-stripped fields, with scattered ponds situated amongst grassland, scrub and woodland. The citation notes that the ponds have widely fluctuating water levels and support large breeding populations of Great Crested Newt (Triturus cristatus)³⁶.
- 3.4.8 Queendown Warren SAC is located in the North Downs and comprises an area of seminatural dry grassland on the south-facing slope of a dry chalk valley³⁷. In addition to the grassland flora, it also supports an important assemblage of rare and scarce orchids and is entomologically diverse.

³² LILEY, D. (2011) What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

³³ JNCC Medway Estuary and Marshes SPA Site Description.

³⁴ LILEY, D. (2011) What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

³⁵ Natural England (2019) North Downs Woodlands SAC. Supplementary Advice.

³⁶ Natural England (2015) Peter's Pit SAC. Supplementary Advice.

³⁷ Natural England (2019) Queendown Warren SAC. Supplementary Advice.

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3.5 Air pollution

- 3.5.1 Natural England has developed a standard methodology for the assessment of traffic related air quality impacts under the Habitats Regulations which is relevant to the HRA of land use plans³⁸. This guidance sets a methodology and thresholds for screening of Likely Significant (air quality) Effects at the HRA screening stage (Stage 1 of the HRA process). Natural England's guidance (in the form of a series of questions / thresholds below) has been applied to determine potential air quality impact pathways to European sites:
 - Does the MLP give rise to emissions which are likely to reach a European site?
 - Are the qualifying features of sites within 200m of a road sensitive to air pollution?
 - Could the sensitive qualifying features of the site be exposed to emissions?
 - Application of screening thresholds (alone and then, if necessary, in-combination).

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

- 3.5.2 The MLP will trigger housing and employment development and as such increase traffic related emissions. Air quality impacts have been shown to typically affect European sites within 10km of a plan boundary³⁹. Campman and Kite (2021) note that '*this zone is based on professional judgment recognising that the effects of growth from development beyond 10km will have been accounted for in the Nitrogen Futures modelling work business as usual scenario*^{'40}. This 10km distance threshold can be a useful guide to identify the broad areas that may be impacted by air quality. However, it is acknowledged that consideration should also be given to larger residential or commercial allocations and their wider potential for air quality impacts in the context of the local and regional road network.
- 3.5.3 Data obtained from the Office for National Statistics highlights the most common destinations for journeys to work undertaken by car or van arising from and finishing in the plan area⁴¹. The key traffic destinations / origins include neighbouring authority areas such as Maidstone, Tonbridge and Malling, Swale, Gravesham and Dartford. The European sites located within 10km of the Plan boundary and within these key commuting areas include:
 - Medway Estuary and Marshes Ramsar
 - Medway Estuary and Marshes SPA
 - North Downs Woodlands SAC
 - Peter's Pit SAC
 - Queendown Warren SAC
 - Thames Estuary and Marshes Ramsar
 - Thames Estuary and Marshes SPA

https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462281 [Date Accessed: 25/04/24].

³⁸ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001).

³⁹ Chapman, C and Kite, B. (2021) Main Report. Guidance on Decision-making Thresholds for Air Pollution. JNCC Report No. 696.

⁴⁰ JNCC. (2022) Nitrogen Future.

⁴¹ Office for National Statistics (2011) Location of usual residence and place of work by method of travel to work (2011 census data). Travel by car or van only. Available at:

- The Swale Ramsar
- The Swale SPA

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

3.5.4 It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance^{42,43,44}. Baseline mapping data has been used to determine the proximity of European sites, and their qualifying features, to roads (within 200m) which may result in an exceedance of Natural England's screening thresholds (A and B roads) within a 10km buffer from the Plan area⁴⁵. The UK Air Pollution Information System (APIS) provides information on all European sites and the sensitivity of their qualifying features (habitats and / or species) to air pollution. This data has been analysed, alongside a deskbased review of site-based data, to determine whether there may be impact pathways from the MLP to any European site through a change in atmospheric emissions (Table 3.1). Based on a review of aerial mapping data and priority habitat information it is concluded that qualifying features of the sites listed in paragraph 3.5.5 are likely to be located within 200m of an A or B road. This information suggests that these locations are sensitive to changes in air quality in particular from atmospheric nitrogen deposition (all qualifying features). The desk-based review indicated that no road links are located within 200m of Queendown Warren SAC.

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

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

⁴² The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality.

⁴³ Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

⁴⁴ Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁴⁵ As per Nitrogen Futures Modelling Work – see Paragraph 5.4.8.

Application of screening thresholds (alone and then, if necessary, incombination)

- 3.5.6 Natural England's advice on the assessment of air quality impacts under the Habitats Regulations states that consideration should be given to the risk of road traffic emissions associated with a local plan⁴⁶. This advice states that an assessment of the risks from road traffic emissions can be expressed in terms of the average annual daily traffic flow (AADT as a proxy for emissions). The use of the AADT screening threshold is advocated by Highways England in their Design Manual for Roads and Bridges (DMRB). This screening threshold is intended to be used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic is required. This non-statutory or guideline threshold is based on a predicted change of daily traffic flows of 1,000 AADT or more (or heavy-duty vehicle flows on motorways (HDV) change by 200 AADT or more).
- 3.5.7 The AADT thresholds do not themselves imply any intrinsic environmental effects and are used solely as a trigger for further investigation. Widely accepted environmental benchmarks for imperceptible impacts are set at 1% of the critical load or level, which is considered to be roughly equivalent to DMRB thresholds for changes in traffic flow of 1,000 AADT and for HDV of 200 AADT. This has been confirmed by modelling using the DMRB Screening Tool that used average traffic flow and speed figures from the Department for Transport (DfT) data to calculate whether the NO_x outputs could result in a change of >1% of critical load / level on different road types. A change of >1,000 AADT on a road was found to equate to a change in traffic flow which might increase emissions by 1% of the Critical Load or Level and might consequentially result in an environmental effect nearby (e.g. within 10 metres of roadside).
- 3.5.8 The AADT thresholds and 1% of critical load/level are considered by Natural England to be suitably precautionary as any emissions below this level are widely considered to be imperceptible and, in the case of AADT, undetectable through the DMRB model. There can, therefore, be a high degree of confidence in its application to screen for risks of an effect.
- 3.5.9 Traffic modelling data was not available at the time of writing. Therefore, taking a precautionary approach, air quality LSEs at European sites set out in **Table 3.1** have been scoped in for further consideration in the HRA process. At Regulation 19 when traffic modelling data is available, a full screening assessment against Natural England's screening thresholds will be undertaken. Where screening thresholds are exceeded, either alone or in-combination, further assessment will be undertaken through the AA process.

⁴⁶ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001).

European site within 10km radius of Plan area	Is the European site sensitive to air quality impacts (as indicated in SIP / NE Supplementary Conservation Advice – Appendix A)?	Is there a strategic road link (A and B roads) located within 200m of the European site?	Has the 1,000 AADT screening threshold been exceeded either alone or in- combination?
Medway Estuary and Marshes SPA Medway Estuary and Marshes Ramsar	Yes	A249, B2004 and A228.	Yes
Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	Yes	B2001, A228, B2000	Yes
The Swale SPA The Swale Ramsar	Yes	A249, B2045, A299 and B2205	Yes
North Downs Woodlands SAC	Yes	A229 (Bluebell Hill) and A249 (Detling Hill)	Yes
Peter's Pit Warren	No	None	No
Queendown Warren SAC	Yes	None	No

Table 3.1: Atmospheric pollution impact pathways to European sites

3.6 Water quality and water quantity

- 3.6.1 Urban development coming forward through the MLP has the ability to affect water dependent European sites through a number of impacts as listed below. These impacts have the potential to change the water balance (levels) and the quality of water entering a European site:
 - Change in surface permeability and run off rates;
 - Increased water demand to supply new homes and businesses;
 - Reduced quality of surface run off water; and
 - Increased effluent discharge for treatment from WwTWs.
- 3.6.2 A review of Natural England's SIP and Supplementary Advice information (**Appendix A**) indicates that there are several European sites located within the Plan area which are hydrologically sensitive including;
 - North Downs Woodlands SAC;
 - Medway Estuary and Marshes Ramsar;
 - Medway Estuary and Marshes Ramsar SPA;
 - Thames Estuary and Marshes Ramsar; and
 - Thames Estuary and Marshes SPA.

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- 3.6.3 European sites located outside the Plan area can also be affected by changes in water supply and quality where they are hydrologically linked to development in the MLP.
- 3.6.4 Decisions relating to water abstraction for supply and disposal of water are controlled through a number of licensing mechanisms and a high-level water planning framework which is subject to HRA. This ensures the protection of the water environment and compliance with the Water Framework Directive (WFD).
- 3.6.5 The Plan area lies within the Thames River Basin District and within the Medway surface water management catchment area⁴⁷ (see **Figure 3.1**). The lower reaches of the River Medway run through the Plan area, entering to the south of Halling before reaching the Estuary at Rochester. The Medway catchment contains a large amount of urban development including the towns of Chatham and Rochester. Areas around the upper Estuary have a legacy of heavy manufacturing industry. The estuaries of the River Medway and the River Thames are located to the north of the Plan area. The Medway Estuary forms a single tidal system with the Swale and feeds into the outer Thames Estuary between the Isle of Grain and Sheerness. The Thames Estuary is contiguous with the Medway and the Swale Estuaries.
- 3.6.6 The Thames River Basin Management Plan (RMBP)⁴⁸ provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. It provides strategic level policy guidance in relation to baseline classification of water bodies, statutory objectives for protected areas and water bodies, and a summary of measures to achieve statutory protection.
- 3.6.7 Medway is located in an area of serious water stress as identified by the Environment Agency⁴⁹. Southern Water and South East Water are the statutory water suppliers for Medway, with Southern Water supplying water to most of the authority and South East Water supplying Halling⁵⁰. It is a statutory requirement that every five years water companies produce and publish a Water Resources Management Plan (WRMP). The WRMP demonstrates long term plans to accommodate the impacts of population growth, drought, environmental obligations, and climate change uncertainty in order to balance supply and demand. WRMP's are linked to Drought Plans which detail the steps that would be taken to ensure that supplies can be maintained whilst minimising the impacts to rivers and the environment during drought events.

⁴⁷ Environment Agency (2019) Catchment Data Explorer. Available at: https://environment.data.gov.uk/catchmentplanning/RiverBasinDistrict/9 [Date Accessed: 06/02/24].

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

⁴⁹ Environment Agency (2021) Water Stressed Areas - final classification. Available at:

https://www.gov.uk/government/publications/water-stressed-areas-2021-classification [Date Accessed: 25/04/24].

⁵⁰ Medway Council (2017) Medway Infrastructure Position Statement.

- 3.6.8 The Environment Agency (EA) prepares Abstraction Licensing Strategies (ALS) through its Catchment Abstraction Management Strategy (CAMS) process. These ALSs are prepared for each sub-catchment within a river basin. The CAMS process aims to assess the amount of water available for further abstraction licensing, taking into account environmental needs and implementation of the RBMPs and water abstraction plans⁵¹. The CAMS process is published in a series of ALSs for each river basin.
- 3.6.9 The Plan area lies within the Medway ALS area (**Figure 3.1**). There are hydrological links between the Plan area and a number of European sites due their location within this ALS area (**Table 3.2**). ALS are important in relation to the RBMP as they assist in determining current and future pressures on water resources and how the supply and demand will be managed by the relevant water companies through WRMPs.

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

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

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

⁵² Environmental Agency (2013) Medway Abstraction Licensing Strategy.

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Appendix 4

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June 2024

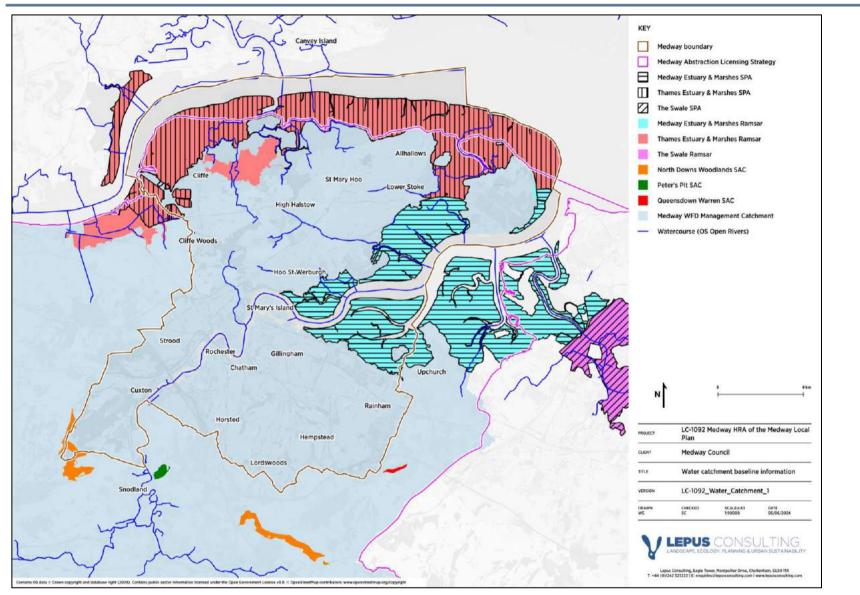


Figure 3.1: Water catchment baseline information and European sites within and adjacent to the Plan area

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

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

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

3.7 Recreational pressure

- 3.7.1 Increased recreational pressure at European sites can result in damage to habitats through erosion and compaction, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, dog fouling and tree climbing etc.
- 3.7.2 A common approach taken across the UK to address recreational impacts at European sites is to establish a Zone of Influence (ZoI) based on detailed visitor survey data. The ZoI is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance at which 75% of interviewees surveyed have travelled to reach a particular site (based on a review of visitor survey data).

⁵³ Natural England (2015) Queendown Warren SAC Site Improvement Plan.

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- 3.7.3 The broad principle of buffer zones is one component of the HRA screening process for recreational pressures. This process also takes into consideration other factors such as recreational management at sites, proximity to settlements and existing recreational resources. Where available, buffer distances have been applied to determine potential pathways of recreational and urbanisation effects from the MLP.
- 3.7.4 The recreational draw of a European site depends on a number of factors. These include the extent and range of facilities provided (in particular parking), accessibility both within the European site and links to the wider area, incorporation of a European site as part of a wider designation such as a National Park and the site's promotion. A review of recreational impact assessments undertaken for other European sites across the UK indicates visitors typically live within 4.2 km (overall median value) of nature conservation sites and that the majority (75%) live within 12.6 km⁵⁴. However, this review recognises that some visitors are prepared to travel longer distances to visit particular sites, for instance coastal and wetland sites.
- 3.7.5 A large body of research has been undertaken into the effect of recreational disturbance upon birds^{55,56}. This has shown that disturbance can result in complex behavioural effects, such as a change in feeding behaviour, reduced breeding success⁵⁷ (due to nest abandonment and increased predation) and wasted energy expenditure due to birds taking flight⁵⁸. The research notes that response differs between species depending on visual and audible disturbances and other external factors⁵⁹ such as food resource availability.

⁵⁴ Weitowitz, D, C. Panter, C. Hoskin, R. and Liley, D. (October 2019) The effect of urban development on visitor numbers to nearby protected nature conservation sites. Journal of Urban Ecology, Volume 5, Issue 1.

⁵⁵ Mitchell J.R., Moser M.E. & Kirby J.S. (1988) Declines in the midwinter counts of waders roosting on the Dee estuary. Bird Study 35:191-198.

⁵⁶ Smit C.J. and Visser J.M. (1993) Effects of disturbance on shorebirds: a summary of existing knowledge from the Dutch Wadden Sea and Delta area. Wader Study Group Bulletin 68: 53-58.

⁵⁷ Liley, D and Sutherland, W. (2007) Predicting the population consequences of human disturbance for Ringed Plovers Charadrius hiaticula: a game theory approach. Ibis 149(1): 82-94.

⁵⁸ Riddington, R., Hassall, M., Lane, S.J., Turner, P.A. and Walters, R. (1996) The impact of disturbance on the behaviour and energy budgets of Brent Geese Branta b. bernicla. Bird Study 43(3): 269-279.

⁵⁹ Cayford, J. T. (1993) Wader disturbance: a theoretical overview. Wader Study Group Bull. 68:3-5.

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- 3.7.6 Bird populations associated with the Thames Estuary and Marshes SPA, Thames Estuary and Marshes Ramsar, Medway Estuary and Marshes SPA, Medway Estuary and Marshes Ramsar, the Swale SPA and the Swale Ramsar designations are vulnerable to recreational impacts. Research has been undertaken to document the effects of bird disturbance⁶⁰ and visitor surveys have been undertaken to determine visitor use of the shoreline and collate visitor origin data^{61,62}. In 2014, based on this work, the North Kent Strategic Access Management and Monitoring Strategy (SAMMS)⁶³ established a strategy to resolve disturbance issues to wintering birds on the North Kent Marshes. Bird Wise is the brand name of the North Kent SAMMS Board, a partnership of local authorities, developers and environmental organisations working together to mitigate disturbance to birds that winter in North Kent⁶⁴. It identifies a 6km ZoI from the North Kent designated sites within which recreational impacts are likely. The SAMMS implemented through Bird Wise is currently in the process of being updated and refreshed to take into consideration new evidence on bird disturbance impacts from recreational activities, the efficacy and costings for SAMMS projects and the proposed level of planned growth within the ZoI.
- 3.7.7 The North Downs Woodlands SAC is split over two locations, the first of which contains part of the Halling to Trottiscliffe Escarpment SSSI, and the second which contains part of the Wouldham to Detling Escarpment SSSI. A small proportion of the SAC near Upper Halling falls within Medway's boundary. The SIP for the North Downs Woodland SAC⁶⁵ notes that off-road vehicles as well as all-terrain bikes are having an impact on parts of the woodland. It states that vehicle damage is associated with vehicles coming off the Public Rights of Way (PRoW) network into the woodland. There has been no visitor survey work undertaken across the North Downs Woodlands SAC to determine a recreational ZoI. Boxley Warren Local Nature Reserve (LNR) forms part of the Wouldham to Detling Escarpment SSSI component of the SAC (outside the Plan area). A survey was undertaken at the LNR⁶⁶ in 2012 which found that 75% of visitors to the site travelled up to 7km to visit the LNR. The outputs of this survey have been used as a precautionary guide to inform this preliminary scoping assessment.
- 3.7.8 Public access and disturbance effects have been identified as a threat and pressure at several European sites, the output of the scoping review is summarised in **Table 3.4** below.

⁶⁰ Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

⁶¹ Fearnley, H. & Liley, D. (2011). North Kent Visitor Survey Results. Footprint Ecology.

⁶² Liley, D., Lake, S. & Fearnley, H. (2012). Phase I – Bird Disturbance Report. Footprint Ecology/GGKM/NE

⁶³ Liley, D. & Underhill-Day, J. (2013). Thames, Medway, and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology.

⁶⁴ Birdwise. About birdwise. Available at: https://northkent.birdwise.org.uk/about/ [Date Accessed: 06/02/24].

⁶⁵ Natural England (2015) North Downs Woodlands SAC SIP.

⁶⁶ Part of the Wouldham to Detling Escarpment SSSI section of the North Downs Woodlands SAC.

European site name	Sensitive to public access and disturbance effects?	Public access and disturbance impact pathways	Will the European site be scoped in for further assessment in the HRA process?
Medway Estuary and Marshes SPA Medway Estuary and Marshes Ramsar	Yes	The qualifying features of this designation are considered to be vulnerable to impacts associated with the MLP in terms of increased recreational pressure from growth. The designation provides a vast and linked expanse of important habitat to the SPA network around the British coastline ⁶⁷ . Given the location of the MLP area within 6km of the North Kent Estuary and Marshes designated sites, recreational disturbance pathways of impact will be looked at further in the HRA process.	Yes
Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	Yes	The qualifying features of this designation are considered to be vulnerable to impacts associated with the MLP in terms of increased recreational pressure from growth. The designation provides a vast and linked expanse of important habitat to the SPA network around the British coastline ⁶⁸ . Given the location of the MLP area within 6km of the North Kent Estuary and Marshes designated sites, recreational disturbance pathways of impact will be looked at further in the HRA process.	Yes
The Swale SPA The Swale Ramsar	Yes	This designation is located more than 6km from the MLP area and therefore the Plan area is outside its recreational ZoI.	No
North Downs Woodlands SAC	Yes	Given the North Downs Woodlands SAC is located within the Plan area (and within the 7km distance visitors were shown to travel), it is considered to be sensitive to recreational impacts associated with the MLP and will therefore be scoped into the HRA process.	Yes
Peter's Pit SAC	No	Given the location of the SAC is outside the Plan area, and taking into consideration the features for which it is designated, it is considered unlikely that there will be recreational pathways of impact. Recreational impacts at the SAC will not be considered further in this HRA.	No
Queendown Warren SAC	No	Given the location of the SAC is outside the Plan area, and taking into consideration the features for which it is designated, it is considered unlikely that there will be recreational pathways of impact. Recreational impacts at the SAC will not be considered further in this HRA.	No

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

⁶⁷ Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

⁶⁸ Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

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3.8 Urbanisation effects

- 3.8.1 Urbanisation effects typically occur when development is located close to a European site boundary. These may include impacts such as noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering, vandalism and fragmentation of habitats. Strategic mitigation schemes elsewhere in the UK have set a presumption against development (i.e. no net increase in residential dwellings) on the basis of site-specific evidence to safeguard against these impacts of between 400m⁶⁹ and 500m⁷⁰. These distances recognise the distance cat predation is likely to take place and also the increased frequency of visits made by people living in close proximity to a designated site.
- 3.8.2 As with recreational impacts, mitigation strategies are often implemented through the establishment of buffer zones. One example of this is the Thames Basin Heaths Special Protection Area Delivery Framework⁷¹ which makes recommendations for accommodating development while also protecting the SPA's qualifying features. This includes the recommendation of implementing a series of zones within which varying constraints would be placed upon development. The zone extending 400m from the SPA boundary concerns urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats). The Delivery Framework concludes that the adverse effects of any net increase in residential development located within 400m of the SPA boundary could not be mitigated since this was the range within which cats could be expected to roam as a matter of routine and there was no realistic way of restricting their movements. As such, no new housing is to be located within this zone.
- 3.8.3 Research undertaken as part of the INTERREG IVB-Project "Tidal River Development" TIDE project has resulted in the development of the TIDE toolkit⁷². This toolkit aims to support managers in understanding the complexities of estuarine systems. It includes a 'Waterbird Disturbance Tool' which provides a process whereby the level of potential disturbance (noise and visual disturbance) to waterbirds from a range of construction activities on or adjacent to wetland systems can be assessed.

⁶⁹ Thames Basin Heaths Strategic Joint Partnership. Thames Basin Heaths SPA Delivery Framework.

⁷⁰ Panter, C., Liley, D., Lake, S., Saunders, P., and Caals, Z. (2022) Visitor survey, recreational impact assessment and mitigation requirements for the Chilterns Beechwoods SAC and the Dacorum Local Plan, Report by Footprint Ecology for Dacorum Borough Council.

⁷¹ Thames Basin Heaths Joint Strategic Partnership Board (2009). Thames Basin Heaths SPA Delivery Framework.

⁷² Cutts N, Hemingway K and Spencer J (2013) The Waterbird Disturbance Mitigation Toolkit Informing Estuarine Planning and Construction Projects. Produced by the Institute of Estuarine and Coastal Studies (IECS). Version 3.2.

- 3.8.4 It is widely acknowledged that noise levels decrease further from the source. In terms of noise impacts, the toolkit indicates that plant generating 100dB(A) at source will likely result in an acceptable level of noise for birds (of below 70dB(A)) at a distance of 20m from the noise source. A maximum noise level of 120dB(A) at source would reduce to an acceptable level of noise for birds (of below 70dB(A)) at just over 300m from source⁷³. In terms of visual disturbance, the toolkit indicates that flight response may be initiated between 100 150m from source, and up to 300m for more sensitive species such as Curlew. This research suggests that a buffer distance of approximately 400m within which urbanisation effects may be experienced is appropriate in terms of this assessment. Urbanisation effects may take place at designated sites and also at functionally linked land.
- 3.8.5 The estuarine and coastal European sites in North Kent are under threat from urban pressures in terms of increased housing and industrial expansion. European sites located within 400m of the MLP area include the North Downs Woodlands SAC, Medway Estuary and Marshes SPA, Medway Estuary and Marshes Ramsar, Thames Estuary and Marshes SPA and Thames Estuary and Marshes Ramsar. Urbanisation effects have therefore been scoped in for further consideration in the HRA process for these designations.
- 3.8.6 Development proposed in the MLP also has the potential to lead to the direct loss and / or urbanisation effects upon habitat which supports qualifying features of European sites, known as functionally linked land⁷⁴, across and adjacent to the Plan area.
- 3.8.7 The tests set out under Regulation 105 of the Habitats Regulations need to be applied in respect of plans which may significantly affect functionally linked land that plays an important role in contributing to the favourable conservation status of the relevant species for which a European site is designated.
- 3.8.8 This is especially important for the North Kent coastal designations, which as noted above, are designated for their diversity of bird species. Certain species of birds, which include qualifying species, use a variety of habitats outside the designation boundaries, for instance as foraging or high tide roost habitat. These habitats may be functionally linked where they play an important role in maintaining or restoring the population of a qualifying bird species at favourable conservation status. Given the mobile nature of the qualifying features of coastal sites, it is considered that urbanisation effects upon functionally linked land is a potential impact pathway. The output of the urbanisation scoping assessment is summarised in **Table 3.5**.

⁷³ The Waterbird Disturbance Mitigation Toolkit. TIDE tools - tide-toolbox.eu.

⁷⁴ "The term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore 'linked' to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status". Source: Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

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European site name	Sensitive to urbanisatio n effects?	Urbanisation impact pathways	Will the European site be scoped in for further assessment in the HRA process?
Medway Estuary and Marshes SPA Medway Estuary and Marshes Ramsar	Yes	The SPA and Ramsar are located within 400m of the MLP area. Urbanisation effects will therefore be considered further in the HRA process. Given the mobile nature of qualifying features associated with these designations, it is also considered that FLL may be located within 400m of the MLP area and therefore could also be affected by urbanisation effects.	Yes
Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	Yes	The SPA and Ramsar are located within 400m of the MLP area. Urbanisation effects will therefore be considered further in the HRA process. Given the mobile nature of qualifying features associated with these designations, it is also considered that FLL may be located within 400m of the MLP area and therefore could also be affected by urbanisation effects.	Yes
The Swale SPA The Swale Ramsar	Yes	The SPA and Ramsar are not located within 400m of the MLP area.	No
North Downs Woodlands SAC	Yes	The SPA and Ramsar are located within 400m of the MLP area and therefore urbanisation effects will be considered further in the HRA process.	Yes
Peter's Pit SAC	No	Peter's Pit SAC is not located within 400m of the Plan area. The SAC is designated for Great Crested Newts (<i>Triturus cristatus</i>). Whilst Great Crested Newts rely on water bodies to breed and during the aquatic stages of their life cycle, they are known to travel approximately 500m from their breeding pond habitat during the terrestrial phase of their lifecycle ^{75,76} . Whilst the MLP area is located at its closest point 450m from the SAC, a review of aerial photography indicates that it is separated from the Plan area by the River Medway. This is likely to create a barrier to movement for newts. It is therefore considered that functionally linked Great Crested Newt habitat will not be affected by development set out in the MLP and this SAC can therefore be scoped out of the HRA process.	No
Queendown Warren SAC	No	As Queendown Warren SAC is not located within 400m of the Plan area and does not support mobile species, this SAC can be scoped out of the HRA process.	No

⁷⁵ Natural England (2015) Great crested newts: protection and licences.

⁷⁶ Langton, T.E.S., Beckett, C.L., and Foster, J.P. (2001), Great Crested Newt Conservation Handbook, Froglife, Halesworth.

3.9 Coastal squeeze

- 3.9.1 As sea levels rise, the low-lying north Kent marshes are subject to 'coastal squeeze'. This is the process by which coastal defences prevent intertidal habitats from migrating landwards and are therefore subsumed by rising sea levels⁷⁷. The coastal habitats site designations are vulnerable to habitat loss through this process as rising sea levels squeeze it close to existing defences. The EA has adopted the Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (MEASS)⁷⁸ which sets out the approach to manage flood risk and coastal erosion risk over the next 100 years. The Strategy sets out a plan for how designated habitats can be retained by realigning defences, or creating compensatory areas in other locations. It aims to enable policies, which promote a combination of 'Hold the Line' and 'Managed Realignment' options, as set out in the Medway Estuary and Swale Shoreline Management Plan⁷⁹ and Isle of Grain to South Foreland Shoreline Management Plan⁸⁰. In addition, the Thames Estuary 2100 Plan outlines how to manage risks from climate change and sea level rise. The area of relevance to Medway is the North Kent Marshes Policy Unit which comprises two large areas located to the north and west of the village of Cliffe. Policy 3 of this strategy applies to this area and means that the Environment Agency will maintain flood defences at their current level, supported by Riverside Strategies.
- 3.9.2 The MEASS was supported by an HRA⁸¹ which showed that the strategy would have adverse effects on intertidal habitats, due to coastal squeeze, which will be compensated for by the provision of replacement saltmarsh by the creation of managed realignment sites. It showed that there would also be an adverse impact on freshwater habitats due to managed realignment and no active intervention, which would be compensated for by compensatory freshwater habitat. The two areas of relevance in Medway include Abbots Court on the Hoo Peninsula and Danes Hill close to Riverside Country Park⁸². Development set out in the MLP must not compromise the ability of required areas for compensation habitat to be delivered. The output of the coastal squeeze scoping assessment is summarised in **Table 3.6**.

European site name	European site located within coastal area	European site scoped in for further consideration?
Medway Estuary and Marshes SPA		
Medway Estuary and Marshes Ramsar	Yes	Yes

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⁷⁷ Arup (2018) Medway Local Plan Development Strategy. Interim Consideration of the Implications of Development Strategy Scenarios on European sites.

⁷⁸ Environment Agency (2018). Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (MEASS).

⁷⁹ Halcrow Group Ltd (2010). Medway Estuary and Swale Shoreline Management Plan.

⁸⁰ Halcrow Group Limited (2010). Isle of Grain to South Foreland Shoreline Management Plan Review 2010.

⁸¹Environment Agency (2018). Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Report – Technical Appendix K: Habitats Regulations Assessment.

⁸² Environment Agency (2018) Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Report – Technical Appendix K – HRA.

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

3.10 European sites and threats and pressures

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

Table 3.7: Summary of impact pat	thways to European sites whi	ich may be associated with the MLP
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Potential impact pathways?	Medway Estuary and Marshes SPA Medway Estuary and Marshes Ramsar	Thames Estuary and Marshes SPA Thames Estuary and Marshes Ramsar	The Swale SPA The Swale Ramsar	North Downs Woodlands SAC
Air pollution	Yes	Yes	Yes	Yes
Water quality and quantity changes	Yes	Yes	Yes	Yes
Recreational pressure	Yes	Yes	No	Yes
Urbanisation impacts	Yes	Yes	No	Yes
Coastal squeeze	Yes	Yes	No	No



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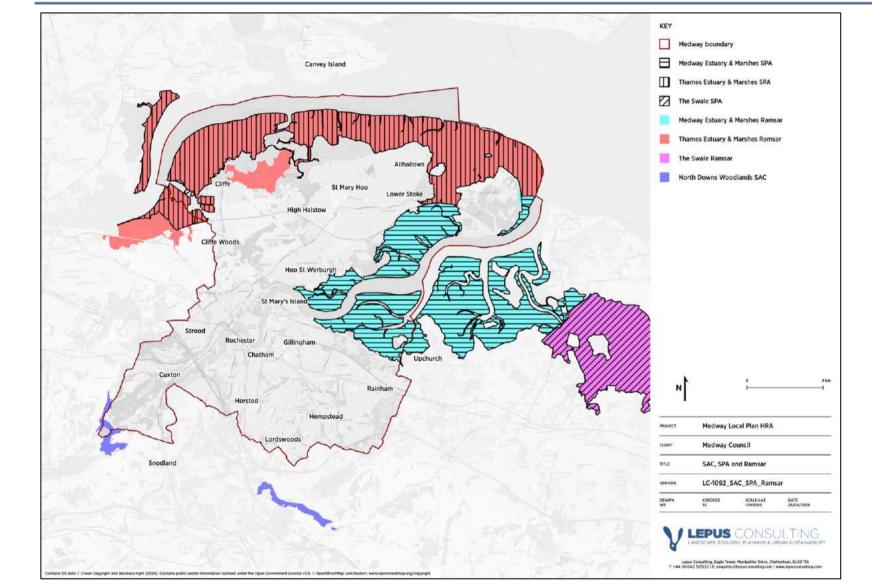


Figure 3.2: European sites scoped in for consideration in the HRA process

4 Screening of the Regulation 18 MLP

4.1 Policy and allocations screening

- 4.1.1 Each policy and allocation which forms the MLP has been appraised against the HRA prescreening criteria (see Table 2.1), taking into consideration case law and best practice. Appendices B and C provide the output of this screening exercise. This detailed assessment has informed the test of likely significance i.e. will the MLP have an LSE, alone or in-combination, at a European site.
- 4.1.2 It is concluded that LSEs, either from the MLP alone or in-combination with other plans or projects, could be screened out for most policies. This is because the policies fall into the following categories (see Table 4.1 for a description of each category):
 - Category A: General statements of policy / general aspirations;
 - Category D: Environmental protection / site safeguarding; and
 - Category F: Policies or proposals that cannot lead to development or other change.
- 4.1.3 A number of policies were however considered likely to have an LSE on the basis of this assessment as they fall into the following categories:
 - Category I: Policies or proposals with a likely significant effect on a site alone;
 - Category L: Policies or proposals which might be likely to have a significant effect in combination; and
 - Category M: Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.
- 4.1.4 The following policies (Table 4.1) will therefore be explored in the Appropriate Assessment (Stage 2 of the HRA process) in more detail.

Table 4.1: Summary of screened in policies (Note: only policies screened into the HRA process have been included in the summary table below. The screening outcome for all policies and allocations is provided at **Appendix B**)

Policy Number	Policy Name	Screening Category
N / A	Spatial Development Strategy	L
Policy S3	North Kent Estuary and Mashes Designates Sites	Μ
Policy S5	Securing Strong Green and Blue Infrastructure	L
Policy S10	Economic Strategy	I
Policy S12	New Employment Sites	I
Policy S13	Innovation Park Medway	L
Policy S18	Chatham Town Centre	L
Policy S19	Rochester District Centre	L
Policy S20	Gillingham District Centre	L

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Policy Number	Policy Name	Screening Category
Policy S21	Strood District Centre	L
Policy S22	Rainham District Centre	L
Policy S23	Hoo Peninsula	L
Policy S24	Hempstead Valley District Centre	L
Policy T7	Houseboats	L
Policy T9	Self-Build and Custom Housebuilding	L
Policy T10	Gypsy, Traveller & Travelling Showpeople	L
Policy T20	Riverside Path	L
Policy T21	Riverside Infrastructure	L
Policy T22	Marinas and Moorings	L
Policy T32	Supply of Recycled and Secondary Aggregates	I
Policy T33	Extraction of Land Won Minerals	I
Policy T36	Location of Waste Management Facilities	L
Policy T37	Other Recovery	L
Policy T38	Landfill	L
Policy T39	Beneficial Use of Inert Waste by Permanent Deposit	L
Policy T40	Wastewater Treatment	L
Policy DM16	Chatham Waters Line	L

- 4.1.5 All allocations were considered to have a potential alone (Category I) or in-combination (Category L) LSE upon European sites and areas of functionally linked land, due potential air quality, water quality and quantity, recreational pressure and urbanisation effects (Appendix C). All allocations were therefore screened into the HRA process.
- 4.1.6 The screening assessment indicated that no allocations are coincident with areas of compensatory habitat identified in the MEASS. Therefore, coastal squeeze impacts have been screened out of the assessment for further consideration in the HRA process. As there are no preferred indicative sites located within 400m of the North Downs Woodlands SAC urbanisation effects are unlikely at this SAC. Given the location of the Swale SPA and Ramsar site further than 6km from the Plan area, recreational and urbanisation LSEs are unlikely and will not be considered further. In addition, no LSEs were identified at Peter's Pit SAC or Queendown Warren SAC and these sites are therefore screened out.
- 4.1.7 LSEs were identified at the following European sites:
 - **Medway Estuary and Marshes SPA** air quality, hydrology, recreational pressure and urbanisation impacts.
 - **Medway Estuary and Marshes Ramsar** air quality, hydrology, recreational pressure and urbanisation impacts.
 - **Thames Estuary and Marshes SPA** air quality, hydrology, recreational pressure and urbanisation impacts.

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

4.2 Screening Conclusion

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

5 Preliminary Air Quality Appropriate Assessment

5.1 Introduction

- 5.1.1 The HRA screening process in **Chapter 4** concluded that a number of MLP policies and all allocations have the potential to result in LSEs at the Medway Estuary and Marshes SPA and Ramsar, Thames Estuary SPA and Ramsar, Swale SPA and Ramsar and North Downs Woodlands SAC due to changes in air quality.
- 5.1.2 Where evidence allows, this section of the report provides a preliminary AA of this issue. It also highlights additional work that will be required to complete the AA at Regulation 19.
- 5.1.3 Policies with potential to have recreational impacts and which are therefore screened into the HRA process include:
 - N / A Spatial Development Strategy
 - Policy S10 Economic Strategy
 - Policy S12 New Employment Sites
 - Policy S13 –Innovation Park Medway
 - Policy S28 Energy Supply
 - Policy T8 Self-Build and Custom Housebuilding
 - Policy T9 Gypsy, Traveller & Travelling Showpeople
 - Policy T24 Supply of Recycled and Secondary Aggregates
 - Policy T33 Extraction of Land Won Materials
 - Policy S18 Chatham Town Centre
 - Policy S19 Rochester District Centre
 - Policy S20 Gillingham District Centre
 - Policy S21 Strood District Centre
 - Policy S22 Rainham District Centre
 - Policy S23 Hoo Peninsula
 - Policy S24 Hempstead Valley District Centre
 - Policy T36 Location of Waste Management Facilities
 - Policy T37 Other Recovery
 - Policy T38 Landfill
 - Policy T39 Beneficial Use of Inert Waste by Permanent Deposit
 - Policy T40 Wastewater Treatment

5.2 Baseline information

- 5.2.1 The main mechanisms through which air pollution can have an adverse effect are through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)⁸³. Deposition of air pollutants can alter the soil and plant composition and species which depend upon these.
- 5.2.2 Excess atmospheric nitrogen deposition within an ecosystem or habitat can disrupt the delicate balance of ecological processes interacting with one another. As the availability of nitrogen increases in the local environment, some plants that are characteristic of that ecosystem may become competitively excluded in favour of more nitrophilic plants. It also impacts the ammonium and nitrate balance of the ecosystem, which disrupts the growth, structure and resilience of some plant species.
- 5.2.3 Excess nitrogen deposition often leads to the acidification of soils and a reduction in the soils' buffering capacity (the ability of soil to resist pH changes). It can also render the ecosystem more susceptible to adverse effects of secondary stresses, such as frost or drought, and disturbance events, such as foraging by herbivores.
- 5.2.4 The qualifying features of the North Kent Estuary and Marshes designations are listed in **Appendix A**. The SIP for the Greater Thames Complex (which includes the Medway Estuary and Marshes SPA, the Thames Estuary and Marshes SPA and the Swale SPA designations)⁸⁴ notes that these sites are vulnerable to air pollution, and in particular atmospheric nitrogen deposition. It notes that the Hen Harrier (*Circus cyaneus*), Little Tern (*Sterna albifrons*) and seabird assemblage are particularly vulnerable to changes in air quality.
- 5.2.5 The SIP for the North Downs Woodlands SAC indicates that dry grasslands and scrublands on chalk or limestone (important orchid sites), Beech forests on neutral to rich soils and Yew-dominated woodland are all sensitive to air pollution.
- 5.2.6 Qualifying species may be indirectly affected by air quality changes where they result in a change in habitat composition and food / resource availability. Qualifying habitats can either be sensitive to direct toxicity from air pollution or affected by changes in soil chemistry associated with nitrogen deposition and acidification. The management target for these designations is to ensure that they contribute to achieving the Favourable Conservation Status of the SPA and SAC's Qualifying Features and ensure that they contribute to achieving the aims of the Wild Birds and Habitats Directives. In order to achieve this, air quality at the SAC and SPAs will need to be restored to 'at or below' critical levels and loads for the features of each site provided on APIS.

⁸³ APIS (2016) Ecosystem Services and air pollution impacts.

⁸⁴ Natural England. 2014. SIP Greater Thames Complex.

- 5.2.7 In an attempt to manage the negative consequences of atmospheric nitrogen deposition and acidification, 'critical loads' and 'critical levels' have been established for ecosystems across Europe. Each European site is host to a variety of habitats and species, the features of which are often designated a critical load for nitrogen deposition. The critical loads of pollutants are defined as a "...quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge"⁸⁵. Critical levels are defined as "concentrations of pollutants in the atmosphere above which have direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge"⁸⁶.
- 5.2.8 **Appendix D** summarises nitrogen and acid deposition critical loads for the qualifying features of the SAC and each SPA in relation to their broad habitat types where relevant. It also provides critical loads for bird species which are part of the North Kent Estuary and Marshes designation's waterbird and breeding bird assemblages and sets out source contribution data for nitrogen deposition.
- 5.2.9 A number of qualifying species of bird associated with the North Kent Estuary and Marshes designations are not considered to be sensitive to changes in nitrogen deposition due to unlikely impacts upon their habitats. Other bird species are however sensitive to changes in nitrogen deposition due to impacts upon their habitats and food availability.
- 5.2.10 At the North Kent Estuary and Marshes, APIS baseline data indicates that nitrogen deposition levels are currently exceeding the lower nitrogen critical load range for most of the habitat classes but in most instances baseline levels are below the upper range. The exception is coastal dune grasslands (grey dunes) acid type, where both the upper and lower nitrogen critical load ranges are exceeded. Source contribution data indicates that road transport contributes between 6–13% of all local sources at the Medway, Thames and Swale designations, with fertiliser and livestock together contributing to between 17-28% of local contributions.
- 5.2.11 Three bird species which are associated with the wintering bird assemblage of the Medway Estuary and Marshes SPA are sensitive to acid deposition due potential effects on their broad habitat type (*Phalacrocorax carbo* (Great Comorant), *Podiceps cristatus* (Great Crested Grebe) and *Sterna hirundo* (Common Tern)). Other bird species are sensitive to changes in acidity levels due to freshwater habitat requirements.

⁸⁵ Coordination Centre for Effects (CCE). Critical load and level definitions. Available at: <u>https://www.umweltbundesamt.de/en/Coordination Centre for Effects</u> [Date Accessed: 08/09/23].

⁸⁶ Coordination Centre for Effects (CCE). Critical load and level definitions. Available at: <u>https://www.umweltbundesamt.de/en/Coordination Centre for Effects</u> [Date Accessed: 08/09/23].

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5.2.12 APIS baseline data for the North Downs Woodlands SAC (**Appendix D**) indicates that both the upper and lower nitrogen critical loads are exceeded for Beech forests and Yew woods, with the lower range for semi-natural dry grasslands and scrubland facies on calcareous substrates also being exceeded. Source attribute data indicates that road transport accounts for 17% of local contributions of nitrogen, with livestock and fertiliser applications accounting for 26% of all local nitrogen contributions. All features of the SAC are considered to be sensitive to acid deposition. Baseline levels of acid deposition are below the maximum acidity critical load level for all qualifying habitat types at the SAC.

5.3 Preliminary Appropriate Assessment

- 5.3.1 Natural England has developed a standard methodology for the assessment of traffic related air quality impacts under the Habitats Regulations which is relevant to the HRA of land use plans⁸⁷. In addition, the Institute of Air Quality Management (IAQM)⁸⁸ and the Chartered Institute of Ecology and Environmental Management (CIEEM)⁸⁹ have also prepared advice on the assessment of air quality impacts at designated sites. This includes consideration of factors such as:
 - The action needed to achieve the conservation objectives for the European site(s).
 - The expected future trend in pollutants of concern (and the scientific reasonableness of any trend).
 - The magnitude of any future 'in combination' dose and how it may change the trend.
 - The physical extent of the affected area as a proportion of that interest feature within the habitats site(s)⁹⁰.
- 5.3.2 In order to better define air quality impacts, traffic modelling data is required to identify whether screening thresholds (as discussed in **Section 3.5**) along road links within 200m of each European site will be exceeded for the MLP either alone or in-combination. Traffic data will be made available at Regulation 19 as part of the traffic modelling that is being undertaken in support of the MLP.
- 5.3.3 Where exceedances of Natural England's screening thresholds are identified, these will be considered in an AA taking into consideration CIEEM and IAQM methodologies, looking at habitat types and habitat responses, baseline data and future trends. Where adverse impacts on site integrity are identified, effective mitigation will need to be designed. This information will be available as the MLP develops and will be presented in the Regulation 19 HRA.

⁸⁷ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001).

⁸⁸ Holman et al (2020). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.1, Institute of Air Quality Management, London.

⁸⁹ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

⁹⁰ CIEEM (January 2021) Paragraph 20. Advisory Note: Ecological Assessment of Air Quality Impacts.

6 Preliminary Water Quality and Quantity Appropriate Assessment

6.1 Introduction

- 6.1.1 The HRA screening process in **Chapter 4** concluded that a number of the MLP policies and all allocations have the potential to result in likely significant water impacts at the following European sites:
 - Medway Estuary and Marshes SPA and Ramsar
 - Thames Estuary and Marshes SPA and Ramsar
 - Swale Estuary and Ramsar
 - North Downs Woodlands SAC
- 6.1.2 The following policies were screened into the HRA process for consideration in an AA due to likely significant water effects. This chapter provides a preliminary AA of this issue where evidence allows. It also highlights additional work that will be required to complete the AA at Regulation 19.
 - N / A Spatial Development Strategy
 - Policy S10 Economic Strategy
 - Policy S12 New Employment Sites
 - Policy S13 Innovation Park Medway
 - Policy S25 Energy Supply
 - Policy T7 Houseboats
 - Policy T9 Self-Build and Custom Housebuilding
 - Policy T10 Gypsy, Traveller & Travelling Showpeople
 - Policy T32 Supply pf Recycled and Secondary Aggregates
 - Policy T33 Extraction of Land Won Materials
 - Policy S18 Chatham Town Centre
 - Policy S19 Rochester District Centre
 - Policy S20 Gillingham District Centre
 - Policy S21 Strood District Centre
 - Policy S22 Rainham District Centre
 - Policy S23 Hoo Peninsula
 - Policy S24 Hempstead Valley District Centre
 - Policy T36 Location of Waste Management Facilities
 - Policy T37 Other Recovery
 - Policy T38 Landfill
 - Policy T39 Beneficial Use of Inert Waste by Permanent Deposit
 - Policy T40 Wastewater Treatment

6.2 Baseline information

Hydrologically sensitive European sites

- 6.2.1 The Medway Estuary forms a single tidal system with the Swale and feeds into the outer Thames Estuary between the Isle of Grain and Sheerness. The Thames Estuary is located on the south side of the Thames Estuary. The marshes extend for approximately 15 km along the south side of the estuary and also include intertidal areas on the north side of the estuary. The Swale is located on the south side of the outer part of the Thames Estuary. The Swale is an estuarine area that separates the Isle of Sheppey from the Kent mainland. To the west it adjoins the Medway Estuary.
- 6.2.2 The North Downs Woodlands SAC consists of mature Beech (Fagus sylvatica) forests and Yew (*Taxus baccata*) woods on steep slopes. These stands lie within a mosaic of scrub, other woodland types and areas of unimproved grassland on thin chalk soils⁹¹.

Water quality

- 6.2.3 As noted in Section 3.6, urbanisation has the potential to reduce the quality of water entering a catchment through processes such as sedimentation, accidental spillage of chemicals and materials and operational surface water runoff. Water quality may also be reduced through effluent discharges at wastewater treatment works. This change in water quality can increase nutrient inputs into a catchment which can lead to algal blooms, reduce dissolved oxygen and increased turbidity. This can affect the overall condition of the receiving waterbody and may have adverse effects at hydrologically sensitive and connected European sites and their qualifying features.
- 6.2.4 Southern Water is the primary provider for wastewater disposal within Medway and has prepared a Drainage and Wastewater Management Plans (DWMP's) across its catchments, including Medway. DWMPs are long term plans that will provide an opportunity to improve water quality and drainage systems and will address pollution and flooding for the benefit of communities and the environment. These long-term plans take into account projected growth over the MLP period.
- 6.2.5 Wastewater is treated at eight locations across Medway. Facilities at Whitewall Creek also serve part of Gravesham, and at Motney Hill, parts of the Swale borough. Southern Water has undertaken a risk assessment in relation to nutrient neutrality for their Drainage and Wastewater Management Plan⁹². This identified wastewater catchments where there is a need or risk of needing to secure nutrient neutrality for growth in order to protect European sites. The North Kent Estuary and Marshes European sites are amongst the designated sites identified in this review as being potentially vulnerable to water quality threats. The assessment for the Medway River Basin catchment indicated that nutrient neutrality is a risk at four wastewater systems including Motney Hill in Medway⁹³.

⁹¹ Natural England (2014) North Downs Woodlands SAC Citation.

⁹² Southern Water (2021) Drainage and Wastewater Management Plan. Summary of the methodology for baseline risk and vulnerability assessment (BRAVA) on: Nutrient Neutrality.

⁹³ Southern Water. Medway River Basin Catchment. BRAVA Summary.

Water quantity

- 6.2.6 Urban development can reduce catchment permeability and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to European sites or watercourses which connect to them and therefore a change in water levels. Water mains leakage and sewer infiltration may also affect water levels. In addition, supply to meet water demand associated with new development (residential and employment development supported by the MLP) also has the potential to affect water balances at hydrologically sensitive European sites which are connected to the Plan area.
- 6.2.7 As noted in **Section 3.6** two water companies operate within Medway, with Southern Water providing the supply to the majority of the Plan area, with South East Water supplying the Haling area. For the purposes of water resource planning, the Southern Water supply area is divided into Water Resource Zones (WRZs). These WRZs have been amalgamated into larger sub-regional supply areas. The MLP area is served from the Kent Medway East and Kent Medway West areas. The Kent Medway East supply area is supplied 100% from groundwater, whilst the Kent Medway West area is supplied 56% from river and reservoir (Bewl Water) and 44% from groundwater⁹⁴. As set out in **Section 3.6**, Medway is in an area of water stress as identified by the Environment Agency.
- 6.2.8 The Southern Water's draft WRMP24⁹⁵ is set to replace the WRMP19⁹⁶ and will cover the period from 2020-2075. Southern Water's draft WRMP24 proposes a range of short-term interventions including leakage reductions, significant demand management and new resource developments, such as smart network technology, water quality improvements, and a water recycling plant near the River Medway. The short-term interventions provide alternative water supplies to industrial water users and drought management schemes. The need for these interventions is due to a combination of changes to abstraction licences, increasing demand, the effects of climate change, and expected further reductions in the water available for use from existing sources as a result of licence changes to protect and enhance the environment.
- 6.2.9 South East Water has also prepared a WRMP which sets out how South East Water plan to secure water supplies from 2025 2075⁹⁷. The long-term forecast shows there is insufficient water available to meet demand, and therefore there is a risk of not meeting supply. Therefore, the WRMP sets out a range of demand management measures and new water supply options that could meet that shortfall in water availability.

⁹⁴ Southern Water (2022) Securing a resilient future for water in the South East A consultation on our draft Water Resources Management Plan.

⁹⁵ Southern Water (2022) Securing a resilient future for water in the South East A consultation on our draft Water Resources Management Plan.

⁹⁶ Southern Water (2019). Water Resource Management Plan.

⁹⁷ South East Water (August 2023) Revised Water Resources Management Plan 2025 to 2075.

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- 6.2.10 The Water Industry Act 1991 as amended by the Water Act 2003 made it a statutory requirement for water companies to produce and maintain a Drought Plan every 5 years. A Drought Plan (or Dry Weather Plan) sets out a framework for a water company to follow at times of drought and dry weather to maintain water supply and links strategically with the WRMPs. Southern Water has a Drought Plan in place to cover the five-year period from 2019⁹⁸ and South East Water's Drought Plan covers the period from 2022 to 2027⁹⁹. A number of drought / dry weather scenarios are tested in these plans under different climatic conditions to show that supply can be maintained. These plans are aligned with the WRMPs.
- 6.2.11 As set out in **Section 3.6**, abstractions for water supply are managed by the Environment Agency through licences issued in line with their CAMS process.
- 6.3 Preliminary Appropriate Assessment

Water quality

- 6.3.1 Growth set out in the MLP has the potential to increase nutrient loading at the North Kent Estuary and Marshes European sites due to increased sewage effluent discharge and run off from new development. This may also act in-combination with other nutrient loadings from other land uses and development outside the MLP area.
- 6.3.2 The SIP for the Thames Complex¹⁰⁰ (which includes the Medway Estuary and Marshes SPA, the Thames Estuary and Marshes SPA and the Swale SPA), does not identify water quality as a threat at these designated sites. However, research undertaken on behalf of Natural England to establish background information on the birds and habitats of the North Kent Marshes¹⁰¹ suggests that nutrient enrichment (in the form of nitrogen and phosphorus) is an issue in the waters around the Thames and Medway estuaries. This body of research indicates that the Environment Agency has recorded growth of green algae covering large areas of the intertidal mudflats in late summer noting: "*work undertaken by the Environment Agency has established that, at present, the intertidal mud and associated wintering birds are not being adversely affected by algal mats"*.
- 6.3.3 A review of condition data for the Medway Estuary and Marshes SSSI, which underpins both the Medway Estuary and Marshes SPA and Ramsar designations, shows that algal blooms were detected at SSSI Unit 100. This unit is located at Bartlett Spit and Bishop Ooze in front of the Motney Hill sewage treatment works outfall. This unit is classed as being in an unfavourable declining status. Algal blooms have the potential to reduce oxygen availability in sediments and impact the benthic invertebrate community upon which other species rely. The output of Southern Water's Brava assessment (paragraph 6.2.4) indicated that water neutrality is a significant risk at Motney Hill wastewater system. Any nutrient enrichment caused by development associated with the MLP, either alone or in-combination, has the potential to exacerbate this risk.

⁹⁸ Southern Water (July 2019) Drought Plan 2019. Technical Report.

⁹⁹ South East Water (May 2022) The Drought Plan.

¹⁰⁰ Natural England (2014) Site Improvement Plan. Greater Thames Complex.

¹⁰¹ LILEY, D. 2011. What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

- 6.3.4 The Thames Estuary and Marshes SPA and Ramsar designations are underpinned by two SSSIs, of which one, South Thames Estuary and Marshes SSSI, is potentially hydrologically linked to the Plan area. A review of condition data associated with this SSSI indicates that no unit is in an unfavourable condition due to presence of algal blooms. The Swale SPA and Ramsar designations are underpinned by one SSSI, The Swale SSSI. A review of condition data associated with this SSSI indicates that no unit is in an unfavourable condition data associated with this SSSI indicates that no unit is in an unfavourable condition due to presence of algal blooms.
- 6.3.5 Estuaries are dynamic systems which are regularly flooded from both fluvial and tidal sources. This means they are regularly flushed with nutrient rich waters, with sediment input being naturally high in the Medway Estuary. The high sediment loading is likely to limit light penetration and availability to photosynthetic organisms¹⁰². This will limit growth and mean that sediments are likely to remain well oxidised¹⁰³. The high sediment loading is likely to be the limiting factor in algal growth, rather than nutrient availability.
- 6.3.6 Policy DM1 Flood and Water Management requires new development to '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. It requires new development to 'ensure that adequate wastewater infrastructure is available in tandem with the development, which are also resilient to the impacts of climate change'. It also promotes the use of Sustainable Urban Drainage Systems (SuDs) to address run-off rates, which also have water quality benefits.
- 6.3.7 At Regulation 19 the AA will apply protective water quality policy wording from the MLP and draw on the wider protective framework for water quality. It will also draw on the outputs of a Water Cycle Study (WCS) which is being undertaken to inform the development of the MLP. The final location of all allocations, in terms of proximity to European sites, will also be taken into consideration and reported upon in the Regulation 19 HRA.

Water quantity

6.3.8 Together the Government, the Environment Agency and the water companies are responsible for preparing plans and strategies and implementing a regulatory framework to ensure there is enough water for the future needs of both people and the environment and managing the treatment of wastewater. This is undertaken through a catchment-based approach and provides protection for European sties and ensures compliance with the WFD¹⁰⁴.

¹⁰² C R Scott+-,KIL Hemingway, M Elliot, V N de Jonge, J S Penthick, S Malcolm and M Wilkinson. 1999. Impact of Nutrients in Estuaries. Phase 2 Summary Report.

¹⁰³ Swale Borough Council. January 2021. Habitats Regulations Assessment Local Plan. AECOM.

¹⁰⁴ <u>https://environment.ec.europa.eu/topics/water/water-framework-directive_en.</u>

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- 6.3.9 Policy DM1 Flood and Water Management will only permit new development within groundwater Source Protection Zones (SPZs) and Principal Aquifers where it has no adverse impact on the quality of the groundwater resource, and it does not put at risk the ability to maintain a public water supply. The purpose of this policy is to protect and conserve water supply in the area. Policy DM1 also promotes water efficiency measures in new development such as the use of grey water and rainwater recycling and low water use sanitary equipment.
- 6.3.10 In preparing the MLP, the Council has been in ongoing liaison with the water companies, to ensure that appropriate and sufficient supply can be made for infrastructure, and that the emerging growth proposals can be supported. This forms part of the Duty to Cooperate on strategic cross border issues and will inform the Infrastructure Delivery Plan which forms a critical component of the MLP evidence base.
- 6.3.11 At Regulation 19 the AA will apply protective water policy wording from the MLP and draw on the wider protective framework for the water environment. On-going consultation undertaken with Southern Water and South East Water in terms of water resource availability for future growth and outputs of the WCS will also input to the assessment.

7 Preliminary Recreational Pressure Appropriate Assessment

7.1 Introduction

- 7.1.1 The following section of the AA focuses on assessing the ecological impacts of increased recreational pressures from the MLP upon the qualifying features of the following European sites which were screened into the HRA process (**Chapter 4**):
 - Medway Estuary and Marshes SPA and Ramsar
 - Thames Estuary and Marshes SPA and Ramsar
 - North Kent Woodlands SAC
- 7.1.2 Policies with the potential to have LSE recreational impacts and therefore which are screened into the AA include:
 - N / A Spatial Development Strategy
 - Policy S9 Star Hill to Sun Pier
 - Policy T7 Houseboats
 - Policy T9 Self-Build and Custom Housebuilding
 - Policy T10 Gypsy, Traveller & Travelling Showpeople
 - Policy T20 Riverside Path
 - Policy DM16 Chatham Waters Line

7.2 Baseline information

- 7.2.1 Development, and specifically housing growth, has the potential to increase recreational pressure at European sites. These pressures can cause the loss of, or damage to, the features for which a European site is designated¹⁰⁵. Recreational activities including land and water-based pursuits can lead to impacts such as:
 - Habitat loss;
 - Habitat fragmentation;
 - Habitat damage through trampling and erosion;
 - Disturbance to plants and animals from increased numbers of people undertaking a range of different open air recreational activities;
 - Disturbance to plants and animals from dogs; and
 - Pollution and contamination caused by dog fouling (eutrophication).

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¹⁰⁵ Natural England. Public Access and Disturbance Theme Plan A strategic approach to identifying and addressing significant effects on the features of Natura 2000 sites.

North Kent Marshes and Estuary Designations

- 7.2.2 Given the contiguous nature of the Medway Estuary and Marshes SPA and Ramsar and the Thames Estuary and Marshes SPA and Ramsar, this section of the report considers these designations collectively. Whilst the screening assessment (**Section 4**) indicates that there are no residential indicative preferred sites located within 6km of the Swale SPA and Ramsar, given these designations are a key component of the wetland, marsh and intertidal habitat system along the north Kent coast, these designations are also considered within this element of the AA.
- 7.2.3 The SIP for the Greater Thames Complex¹⁰⁶ (which includes the Medway Estuary and Marshes SPA, the Thames Estuary and Marshes SPA and the Swale SPA), and extensive research carried out in north Kent^{107,108} indicates that these sites are vulnerable to recreational disturbance. In particular, it has been shown that there have been marked declines in the numbers of birds using the SPA and Ramsar designations at areas where public access for recreational purposes is greatest. Recent bird disturbance surveys were undertaken in 2021/2022¹⁰⁹ to collect current data on abundance, distribution, disturbance events, and responses of waterbirds within a defined study area using the same survey locations as previous surveys. These surveys highlighted the link between dogs off the lead and bird disturbance, and identified the key focal areas along the coast for access and recreational activity, Riverside Country Park and Grain Coastal Park.
- 7.2.4 An increase in development from the MLP has the potential to increase recreational pressure on these designated sites and undermine its ability to achieve relevant conservation objectives.
- 7.2.5 The research undertaken in 2011 and 2012 established a zone of influence of 6km, within which new development was considered to have the potential to contribute to recreational disturbance impacts.

¹⁰⁶ Natural England (2014) SIP Greater Thames Complex.

¹⁰⁷ Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

¹⁰⁸ LILEY, D. (2011) What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collation and analysis. Natural England Commissioned Reports, Number 082.

¹⁰⁹ Kent Wildlife Trust Consultancy Services (2022) North Kent SAMMS – Bird Disturbance Surveys Winter 2021/22.

7.2.6 In 2014, on the basis of the 2011/12 survey work, a strategic approach to recreational mitigation was developed by the North Kent Environmental Planning Group, known as the Bird Wise scheme. This set out mitigation required to address recreational pressure from future growth in north Kent¹¹⁰ upon the North Kent Estuary and Marshes designated sites to ensure no adverse impact on their site integrity and measures to monitor the efficacy of this mitigation. This strategy is currently in place until 2034, which falls slightly short of the MLP end date of 2041. The Bird Wise scheme will be fully reviewed and refreshed in approximately 3 years' time. This will provide an updated picture of the distribution and scale of recreational impacts and bird disturbance, levels and locations of visitor activity and a refresh of the zone of influence. This review will also look at extension of the scheme to reflect a longer time period. Until such time as this review has been undertaken, the current strategy will be continued.

North Downs Woodlands SAC

- 7.2.7 As noted in Section 3.7, the North Downs Woodlands SAC is split over two locations, Halling to Trottiscliffe Escarpment SSSI, and Wouldham to Detling Escarpment SSSI. A small proportion of the SAC near Upper Halling falls within Medway's boundary. The SIP for the SAC notes that off-road vehicles, as well as all-terrain bikes, are having an impact on parts of the woodland. It states that damage is associated with vehicles coming off the PRoW network into the woodland¹¹¹.
- 7.2.8 Under the Valley of Visions Landscape Partnership Scheme, the Securing the Landscape Project¹¹² was set up in the Medway Gap to help manage the illegal activity and reduce potential impacts in a joint initiative with stakeholders including Kent Police and local landowners. A Police Community Support Officer (PCSO) for the area is funded through this project. This project has had a positive impact on managing access to, and on the condition of the North Downs Woodlands SAC.
- 7.2.9 Whilst no visitor survey has been undertaken to define a formal recreational ZoI for the SAC, as noted in Section 3.7, a visitor survey was undertaken at a small section of the Wouldham to Detling Escarpment SSSI, known as Boxley Warren LNR (outside the MLP area). This survey suggested that 75% of visitors travel 7km to visit this section of the SAC. This visitor survey data has been used as a guide zone of influence in this assessment.

¹¹⁰ Local Planning Authority areas included: Canterbury, Dartford, Gravesham, Medway and Swale.

¹¹¹ Natural England (2015) Site Improvement Plan North Downs Woodland.

¹¹² Valley of Visions Landscape Partnership Scheme. General Booklet.

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- 7.2.10 The Halling to Trottiscliffe Escarpment SSSI section of the North Downs Woodlands SAC, which is located within the MLP area, can be accessed from Holly Hill Wood public open space and the Whitehorse Wood and Holly Hill Local Wildlife Site (LWS). These sites are linked to the SAC via the PRoW network. A review of ordnance survey data indicates that there is a restricted byway, the North Downs Way long distance trail, which runs in a north to south direction along the eastern boundary of the SAC. A number of PRoW link to this trail, running along the boundary of the SAC and within the SAC itself at Greatpark Wood, Hanginghill Wood and Crookhorn Wood. The Halling to Trottiscliffe Escarpment SSSI section of the SAC is poorly signposted with very little parking. A small car park is located at Holly Hill Wood. There are no visitor facilities such as toilets.
- 7.2.11 At the Wouldham to Detling Escarpment SSSI section of the North Downs Woodlands SAC, ordnance survey data shows that the Pilgrim's Way runs to its south. The North Downs Way long distance trail links to the Pilgrim's Way, running along the northern boundary of the SAC in a north west to south east direction. Whilst there is no formal parking at the SAC, there are a number of settlements including Detling and Boxley which are likely to provide parking opportunities. Access into the SAC in the north is obtained from a roman road under the A229 and over the Channel Tunnel Rail Link at the White Horse Stone local land mark. Access in the south is via the Pilgrim's Way track and PRoW network from Detling.

7.3 Preliminary Appropriate Assessment

North Kent Marshes and Estuary Designations

7.3.1 **Figure 7.1** shows that a number of the indicative preferred sites are located within the 6km ZoI where development has the potential to result in an adverse impact on the integrity of the North Kent Marshes and Estuary designations.

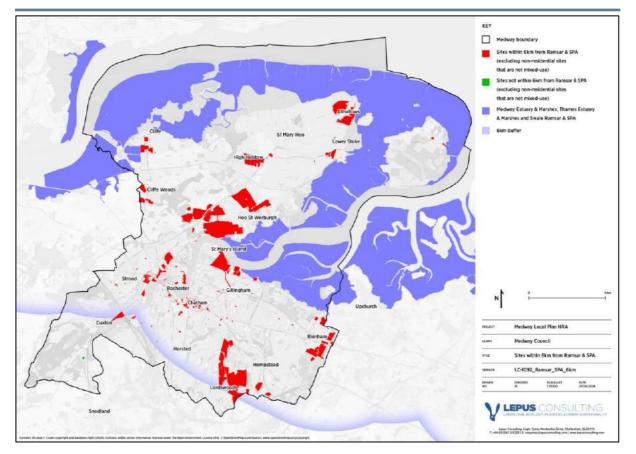
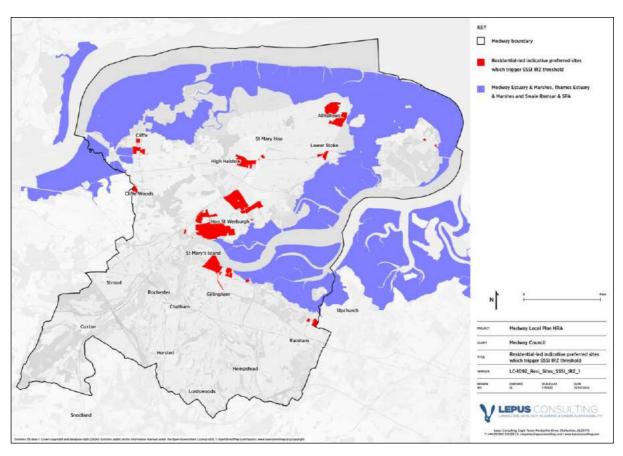


Figure 7.1: Preferred indicative site locations within the Bird Wise 6km ZoI

- 7.3.2 All residential allocations within 6km of these designated sites will be required to pay a developer contribution towards the Bird Wise scheme. This scheme will see the implementation of mitigation and monitoring measures to ensure no adverse impact on the integrity of the designated sites due to new development from the MLP in-combination with other plans and projects which deliver growth in the area of impact. The requirement for new development to contribute towards Bird Wise is secured through the MLP at Policy S3: North Kent Estuary and Marshes Designated Sites. This policy states:
- 7.3.3 'Development within 6km of those 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), Bird Wise' Project Board or undertake their own Habitats Regulations Assessment.

Policy S3 will apply to all new residential development including residential moorings and houseboats (as set out under Policy T7 – Houseboats).

- 7.3.4 A number of indicative preferred sites on the Hoo Peninsula and also along the southern coast of the Medway Estuary (at Chatham Docks at St Mary's Island moving to the east towards Rainham), are located within close proximity, and in some cases adjacent, to the following European sites (see **Figure 7.2**):
 - Medway Estuary and Marshes SPA
 - Medway Estuary and Marshes Ramsar
 - Thames Estuary and Marshes SPA



Thames Estuary and Marshes Ramsar

Figure 7.2: Residential indicative preferred sites which trigger SSSI IRZ thresholds

- 7.3.5 Natural England's SSSI Impact Risk Zones (IRZs) define areas around a SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts upon it. They also cover the interest features and sensitivities of European sites, which are underpinned by SSSI designations. A review of Natural England's SSSI IRZs for the residential indicative preferred sites which are within close proximity to the North Kent Marshes and Estuary designations, indicates that a number of these will trigger requirements to consult with Natural England. The outputs of this review and potential adverse impact thresholds are summarised in **Appendix E.**
- 7.3.6 Whilst it is considered that Bird Wise will provide appropriate mitigation for recreational impacts from proposed MLP growth (in-combination) across the majority of the Plan area, the recreational impacts of allocations in close proximity to the designated sites (Table 7.1) needs to be looked at in more detail. This will determine if Bird Wise alone is sufficient to mitigate recreational pressures from MLP growth in this area specifically. Any additional mitigation will be secured through policy wording which will include recommendations on governance and funding.
- 7.3.7 Policy T20 Riverside Path sets out the aspiration for provision of a riverside path across the Plan area. This policy reads as follows:

- 7.3.8 'Waterfront development proposals will incorporate public space to facilitate walking and cycling and demonstrate the highest design standards, including Local Transport Note 1/20 (Cycle Infrastructure Design) and Sport England's Active Design guidance. Development proposals will demonstrate how any impacts will be mitigated. Opportunities to provide linkages with other path networks should be explored where these are compatible with other policies and do not result in impacts on coastal designated sites'.
- 7.3.9 The design aspiration for enhanced waterfront accessibility and active travel along the waterfront is echoed in other policies of the MLP, although specific details are not provided. These policies include Policy DM16 Chatham Waters Line, Policy S9 Star Hill to Sun Pier and Policy S5 Securing Strong Green and Blue Infrastructure. The improvement of waterfront accessibility close to the North Kent Marshes and Estuary designations has the potential to increase recreational pressures at these areas.
- 7.3.10 Mitigation to ensure no adverse effects occur at any European site as a result of improved waterfront access and the Riverside Path is provided through Policy S3 (North Kent Estuary and Marshes Designated Sites) and also within Policy T20 itself, which reads 'Opportunities to provide linkages with other path networks should be explored where these are compatible with other policies and do not result in impacts on coastal designated sites'.
- 7.3.11 At Regulation 19 the AA will apply protective policy wording from the MLP which is intended to protect the North Kent Marshes and Estuary designations from recreational impacts. The assessment will also take into consideration the final selection of sites and the outputs from the emerging evidence base.

North Downs Woodlands SAC

7.3.12 Indicative preferred sites which are located within 7km of the North Downs Woodlands SAC are shown in **Figure 7.3**.

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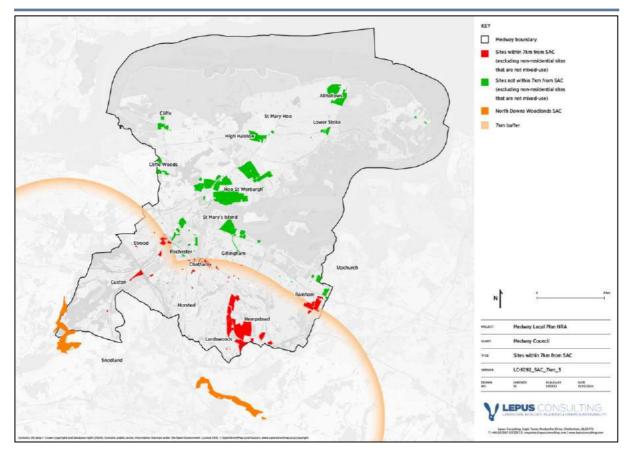


Figure 7.3: North Downs Woodlands SAC 7km zone of influence and preferred indicative site locations

- 7.3.13 The closest indicative preferred site is Site CHR6, which is located at Halling and is for 88 residential units. At its closest point CHR6 is located approximately 2.1km to the east of the Halling to Trottiscliffe Escarpment SSSI section of the SAC. Site CHR14 is located to the east of Cuxton and is allocated for 49 residential units, approximately 4.3km to the east of the Halling to Trottiscliffe Escarpment SSSI section of the SAC. Other residential allocations within 7km of the SAC are located in the urban areas of Strood and Chatham (see **Figure 7.3**).
- 7.3.14 All preferred indicative sites set out in the Regulation 18 MLP, with the exception of Sites CHR6 and CHR14, are separated from the North Downs Woodland SAC by the M2. This strategic route presents a considerable barrier to movement.
- 7.3.15 A desktop review has indicated that there are a number of existing publicly accessible spaces, with similar habitat characteristic to the North Downs Woodlands SAC, in closer proximity to the MLP allocations than the SAC. These include county parks, parkland and nature reserves such as Capstone Farm Country Park. A number of these sites also provide better facilities such as parking, cafes and signed footpaths.
- 7.3.16 As noted, in the SIP for the North Downs Woodland SAC, the key recreational threat at the woodland is in relation to antisocial behaviour (off-road vehicles) rather than recreational disturbance. Mitigation is already in place to address this threat. At Regulation 19, the AA will take into consideration the location of the final selection of sites and their distance from the SAC, facilities at the SAC, availability of other publicly accessible spaces closer to the Plan area and the policy framework set out in the MLP in respect of green infrastructure and open space.

8 Preliminary Urbanisation Appropriate Assessment

8.1 Introduction

- 8.1.1 The following section of the AA focuses on assessing the ecological impacts of increased urbanisation from the MLP upon the qualifying features of the following European sites, and areas of associated functionally linked land:
 - Medway Estuary and Marshes SPA and Ramsar
 - Thames Estuary and Marshes SPA and Ramsar
- 8.1.2 The HRA screening process (**Appendix B**) concluded that the following policies have the potential to result in LSEs on these sites as a result of urbanisation:
 - N / A Spatial Development Strategy
 - Policy S10 Economic Strategy
 - Policy S12 New Employment Sites
 - Policy S13 Innovation Park Medway
 - Policy S25 Energy Supply
 - Policy T7 Houseboats
 - Policy T9 Self-Build and Custom Housebuilding
 - Policy T10 Gypsy, Traveller & Travelling Showpeople
 - Policy T32 Supply pf Recycled and Secondary Aggregates
 - Policy T33 Extraction of Land Won Materials
 - Policy S18 Chatham Town Centre
 - Policy S19 Rochester District Centre
 - Policy S20 Gillingham District Centre
 - Policy S21 Strood District Centre
 - Policy S22 Rainham District Centre
 - Policy S23 Hoo Peninsula
 - Policy S24 Hempstead Valley District Centre
 - Policy T36 Location of Waste Management Facilities
 - Policy T37 Other Recovery
 - Policy T38 Landfill
 - Policy T39 Beneficial Use of Inert Waste by Permanent Deposit
 - Policy T40 Wastewater Treatment
- 8.1.3 A number of indicative preferred sites are located within 400m of these designations or associated areas of functionally linked land and have therefore also been screened into the AA (**Appendix C**).

8.2 Baseline Information

- 8.2.1 As noted in **Section 3.8** urbanisation effects can result from all types of development set out in the MLP including housing, retail and employment. Urbanisation effects often occur where development is located within close proximity to a European site. Urbanisation impacts may include construction and operation related noise pollution, light pollution, visual disturbance, dumping of waste, predation from domestic pets, vandalism, spread of invasive plant species and encroachments from properties among other impacts.
- 8.2.2 Research undertaken as part of the INTERREG IVB-Project "Tidal River Development" TIDE project¹¹³ (which includes a 'Waterbird Disturbance Tool Kit'), indicates that construction and operational related noise and visual disturbance to waterbirds may extend to 300m (acknowledging that species of birds respond in different ways to stimuli and external factors (such as food resource) may also play a role) ¹¹⁴. This research suggests that disturbance is more likely to have an impact on bird populations where habitats are not continuous in nature. Sources of disturbance which are irregular and infrequent are therefore likely to have a greater impact, as birds are less likely to be habituated to these sources of disturbance. Disturbance is therefore a function of the scale of disturbance, the distance of the source of disturbance and its frequency and duration. Other urbanisation effects, such as householder related garden waste dumping, vandalism, or anti-social behaviours, are likely where housing is located within close proximity to development, approximately 400m.
- 8.2.3 The Medway Estuary and Marshes SPA and Ramsar and the Thames Estuary and Marshes SPA and Ramsar sites are designated for the presence of a number of mobile qualifying features (see **Appendix A** for site conservation objectives). These birds have a number of differing habitat requirements as presented in **Appendix F**. These include foraging inland for instance at agricultural fields (such as Brent Goose (*Branta bernicla bernicla*), Bewick Swan (*Cygnus columbianus bewickii*), Greater White Fronted Goose (*Anser albifrons albifrons*), Lapwing (*Vanellus vanellus*) and Golden Plover (*Pluvialis apricaria*)) or roosting in fields adjacent to the coast (Dunlin (*Calidris alpina alpine*)).
- 8.2.4 As such, land outside a designated site boundary may also provide a crucial supporting role to the qualifying birds populations i.e. provide functionally linked habitat. As noted in **Section 3.3**, Natural England note that 'the term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore 'linked' to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status'.
- 8.2.5 Urbanisation effects have the potential to impact upon both designated sites and those parcels of land which have the potential to support qualifying features of a European site and may therefore provide functionally linked habitat.

¹¹³ Cutts N, Hemingway K and Spencer J (2013) The Waterbird Disturbance Mitigation Toolkit Informing Estuarine Planning and Construction Projects. Produced by the Institute of Estuarine and Coastal Studies (IECS). Version 3.2.

¹¹⁴ The Waterbird Disturbance Mitigation Toolkit. TIDE tools - tide-toolbox.eu.

8.3 Preliminary Appropriate Assessment

- 8.3.1 Indicative preferred sites set out in **Table 8.1** and illustrated on **Figure 8.1** are located within 400m of a designated European site.
- 8.3.2 A detailed review of potential parcels of functionally linked land will be undertaken through the AA at Regulation 19. Taking a precautionary approach at this stage of the HRA process, it is assumed that areas of grazing marsh habitat, on the Hoo Peninsula in particular, could serve as functionally linked land. In addition, it is assumed that other areas of open grassland or arable land adjacent to European sites and also close to the RSPB reserves on the peninsula including the reserves at Shorne Marshes, Higham Marshes, Cliffe Pools and Northward Hill could also be functionally linked. The urbanisation screening assessment for functionally linked land, as presented in **Appendix C**, and summarised in **Appendix E** and **Figure 8.1**, took into consideration the suitability of the habitat type at each indicative preferred site location and in the surrounding area alongside other factors listed below. This allowed potential impacts from the MLP on functionally linked land to be determined.
 - Distance from the European site (sites closer to an SPA and/or Ramsar site are more likely to provide roosting and /or foraging opportunities for birds).
 - Site characteristics including details on:
 - Habitat type including historical knowledge;
 - Cropping regime, including how often the site is planted with a suitable crop;
 - Visibility (for example are there unrestricted sight-lines);
 - Details of any field boundaries (trees/hedgerows/field drains);
 - \circ $\;$ Details of any permanent waterbodies, areas of seasonal flooding; and
 - \circ The size of the site.
 - Details of any existing factors (where available) that may affect the habitat suitability, including:
 - Existing public rights of way and their usage, especially by users with dogs;
 - Proximity to existing built up areas; and
 - Existing farming practices (for example the use of bird scarers/deterrents).
 - Noise and visual disturbance including information on whether the area is subject to control through shooting or wildfowling.
 - Presence of large and/or multiple overhead power lines.

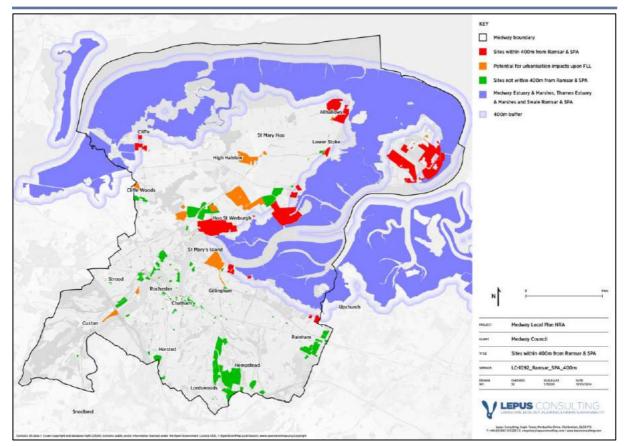


Figure 8.1: MLP indicative preferred sites which are located within 400m of a European site or with the potential to have urbanisation effects on possible functionally linked land

- 8.3.3 Other mitigation strategies across the UK have excluded development within a 400m zone where urbanisation effects are likely. The bird disturbance research undertaken on behalf of the North Kent Environmental Planning Group (**Section 7.2**) looked at the possibility of including an exclusion zone within the SAMS Bird Wise scheme. This concluded that a 'sterile' zone of no development around the North Kent SPAs would encompass ports, town centres, very built-up residential areas and contaminated brownfield sites and therefore development would potentially be halted or pushed to greenfield sites and prevent the regeneration of urban centres¹¹⁵. As such, a coastwide 400m exclusion zone was not considered further as part of the SAMS.
- 8.3.4 Given the location of indicative preferred sites within 400m of European sites and close to areas of potential functionally linked land, it is necessary to ensure that operational and construction related noise, visual and lighting proposals do not have a disturbance impact upon the qualifying bird species of the North Kent Estuary and Marshes designations. This may include the incorporation of screens, bunds, fencing, directional lighting, and low noise emitting equipment among other solutions.

¹¹⁵ Liley, D. & Underhill-Day, J. (2013). Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology

8.3.5 At Regulation 19, the AA will assess the potential ecological impacts of development on the Hoo Peninsula and to the south of the Medway Estuary and will set out best practice methods to mitigate urbanisation impacts. These measures will be incorporated into site allocation policy wording where necessary. Site allocation policy wording may also set out the requirement for development at certain sites to undertake bird surveys to investigate whether certain parcels of land (or adjacent land parcels of land) support a significant population of birds or invertebrates, for which the North Kent Estuary and Marshes European sites are designated, this will and allow an assessment as to the role that each site plays in maintaining or restoring the population of qualifying species at favourable conservation status.

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9 Next Steps

9.1 Conclusions

- 9.1.1 This HRA report provides an assessment of the Regulation 18 consultation which includes indicative preferred site locations and policies and screened in LSEs at the following European sites:
 - Medway Estuary and Marshes SPA air quality, hydrology, recreational pressure and urbanisation impacts.
 - **Medway Estuary and Marshes Ramsar** air quality, hydrology, recreational pressure and urbanisation impacts.
 - **Thames Estuary and Marshes SPA** air quality, hydrology, recreational pressure and urbanisation impacts.
 - **Thames Estuary and Marshes Ramsar** air quality, hydrology, recreational pressure and urbanisation impacts.
 - **The Swale SPA** air quality and hydrology.
 - **The Swale Ramsar** air quality and hydrology.
 - North Downs Woodlands SAC air quality, hydrology and recreational pressure.
- 9.1.2 This report also identifies information required to inform the AA at the Regulation 19 stage of the plan making process. No final conclusions have been drawn at this stage in the process in terms of adverse impacts on the site integrity of any European site (alone or in-combination).

9.2 Next steps

- 9.2.1 Screening will be revisited at Regulation 19 when the MLP is further developed to take into consideration any changes.
- 9.2.2 At Regulation 19 a full AA will be presented in support of the Publication MLP which will allow the Council, as the Competent Authority, to make the Integrity Test. The Authority will take into consideration representations from Natural England under the provisions of the Habitats Regulations at Regulation 105(2).

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

Medway Estuary and Marshes SPA¹

Conservation objectives:

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

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

Qualifying features:

A046a Branta bernicla bernicla; Dark-bellied brent goose (Non-breeding)

A048 Tadorna tadorna; Common shelduck (Non-breeding)

A054 Anas acuta; Northern pintail (Non-breeding)

A132 Recurvirostra avosetta; Pied avocet (Breeding)

A132 Recurvirostra avosetta; Pied avocet (Non-breeding)

A137 Charadrius hiaticula; Ringed plover (Non-breeding)

A141 Pluvialis squatarola; Grey plover (Non-breeding)

A143 Calidris canutus; Red knot (Non-breeding)

A149 Calidris alpina alpina; Dunlin (Non-breeding)

A162 Tringa totanus, Common redshank (Non-breeding)

A195 Sterna albifrons; Little tern (Breeding)

Waterbird assemblage

Breeding bird assemblage

Threats and pressures at European site which may be affected by the Plan²:

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

¹ Natural England (2019) Medway Estuary & Marshes SPA Conservation Objectives Available at: http://publications.naturalengland.org.uk/publication/6672791487119360 [Date accessed 24/06/24].

² Natural England (2014) Site Improvement Plan Greater Thames Complex Available at: http://publications.naturalengland.org.uk/publication/6270737467834368 [Date accessed 24/06/24].

Medway Estuary and Marshes Ramsar³

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

Ramsar Criterion	Justification for the application of each criterion	
2	The site supports a number of species of rare plants and animals.	
	The site holds several nationally scarce plants, including sea barley <i>Hordeum marinum</i> , curved hard-grass <i>Parapholis incurva</i> , annual beard-grass <i>Polypogon monspeliensis</i> , Borrer's saltmarsh-grass <i>Puccinellia fasciculata</i> , slender hare`s-ear <i>Bupleurum tenuissimum</i> , sea clover <i>Trifolium squamosum</i> , saltmarsh goose-foot <i>Chenopodium chenopodioides</i> , golden samphire <i>Inula crithmoides</i> , perennial glasswort <i>Sarcocornia perennis</i> and one-flowered glasswort <i>Salicornia pusilla</i> .	
	A total of at least twelve British Red Data Book species of wetland invertebrates have been recorded on the site. These include a ground beetle <i>Polistichus connexus</i> , a fly <i>Cephalops perspicuus</i> , a dancefly <i>Poecilobothrus ducalis</i> , a fly <i>Anagnota collini</i> , a weevil <i>Baris scolopacea</i> , a water beetle <i>Berosus spinosus</i> , a beetle <i>Malachius vulneratus</i> , a rove beetle <i>Philonthus punctus</i> , the ground lackey moth <i>Malacosoma castrensis</i> , a horsefly <i>Atylotus latistriatuus</i> , a fly <i>Campsicnemus magius</i> , a solider beetle, <i>Cantharis fusca</i> , and a cranefly <i>Limonia danica</i> . A significant number of non-wetland British Red Data Book species also occur.	
5	Assemblages of international importance: Species with peak counts in winter: 47637 waterfowl (5-year peak mean 1998/99-2002/2003)	
6	Qualifying Species/populations (as identified at designation):	
	Species with peak counts in spring/autumn:	
	• Grey plover, <i>Pluvialis squatarola</i> , E Atlantic/W Africa -wintering 3103 individuals, representing an average of 1.2% of the population (5-year peak mean 1998/9-2002/3)	
	• Common redshank, <i>Tringa totanus totanus</i> , 3709 individuals, representing an average of 1.4% of the population (5-year peak mean 1998/9-2002/3)	
	Species with peak counts in winter:	
	• Dark-bellied brent goose, <i>Branta bernicla bernicla</i> , 2575 individuals, representing an average of 1.1% of the population (5-year peak mean 1998/9-2002/3)	
	• Common shelduck, <i>Tadorna tadorna</i> , NW Europe 2627 individuals, representing an average of 3.3% of the GB population (5-year peak mean 1998/9-2002/3)	

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³ JNCC (2008) Information Sheet on Medway Estuary and Marshes Ramsar Wetlands Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11040.pdf [Date accessed 24/06/24].

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Ramsar Criterion	Justification for the application of each criterion		
	• Northern pintail, <i>Anas acuta</i> , NW Europe 1118 individuals, representing an average of 1.8% of the population (5-year peak mean 1998/9-2002/3)		
	• Ringed plover, <i>Charadrius hiaticula</i> , Europe/Northwest Africa 540 individuals, representing an average of 1.6% of the GB population (5-year peak mean 1998/9- 2002/3)		
	• Red knot, <i>Calidris canutus islandica</i> , W & Southern Africa (wintering) 3021 individuals, representing an average of 1% of the GB population (5-year peak mean 1998/9- 2002/3)		
	• Dunlin, <i>Calidris alpina alpina</i> , W Siberia/W Europe 8263 individuals, representing an average of 1.4% of the GB population (5-year peak mean 1998/9-2002/3)		
	Species/populations identified subsequent to designation for possible future consideration under criterion 6.		
	Species with peak counts in spring/autumn:		
	• Black-tailed godwit, <i>Limosa limosa islandica</i> , Iceland/W Europe 721 individuals, representing an average of 2% of the population (5-year peak mean 1998/9- 2002/3)		
	Contemporary data and information on waterbird trends at this site and their regional (sub- national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually.		

Threats and Pressures at European site which may be affected by the Plan⁴:

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

Thames Estuary and Marshes SPA⁵

Conservation objectives:

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

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

⁵ Natural England (2019) Thames Estuary & Marshes SPA Conservation Objectives Available at: http://publications.naturalengland.org.uk/publication/4698344811134976 [Date accessed 24/06/24].

⁴ JNCC (2008) Information Sheet on Ramsar Wetlands Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11040.pdf [Date accessed 24/06/24].

Thames Estuary and Marshes SPA⁵

Qualifying features:

A082 *Circus cyaneus*; Hen harrier (Non-breeding)
A132 *Recurvirostra avosetta*; Pied avocet (Non-breeding)
A137 *Charadrius hiaticula*; Ringed plover (Non-breeding)
A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
A143 *Calidris canutus*; Red knot (Non-breeding)
A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
A162 *Tringa totanus*; Common redshank (Non-breeding)
Waterbird assemblage

Threats and pressures at European site which may be affected by the Plan⁶:

- Public Access / Disturbance
- Air Pollution Nitrogen deposition

Thames Estuary and Marshes Ramsar⁷

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

Ramsar Criterion	Justification for the application of each criterion
2	The site supports one endangered plant species and at least 14 nationally scarce plants of wetland habitats. The site also supports more than 20 British Red Data Book invertebrates
5	Assemblages of international importance: Species with peak counts in winter: 45118 waterfowl (5-year peak mean 1998/99-2002/2003)
6	 Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: Ringed plover, <i>Charadrius hiaticula</i>, Europe/Northwest Africa 595 individuals, representing an average of 1.8% of the GB population (5-year peak mean 1998/9- 2002/3) Black-tailed godwit, <i>Limosa limosa islandica</i>, Iceland/W Europe 1640 individuals, representing an average of 4.6% of the population (5-year peak mean 1998/9-2002/3)

⁶ Natural England (2014) Site Improvement Plan Greater Thames Complex Available at: <u>http://publications.naturalengland.org.uk/publication/6270737467834368</u> [Date accessed 24/06/24].

⁷ JNCC. (2008) Information Sheet on Ramsar Wetlands (RIS). Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11069.pdf [Date Accessed: 24/06/24].

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Ramsar Criterion	Justification for the application of each criterion		
	Species with peak counts in winter:		
	• Grey plover, <i>Pluvialis squatarola</i> , E Atlantic/W Africa -wintering 1643 individuals, representing an average of 3.1% of the GB population (5-year peak mean 1998/9-2002/3)		
	• Red knot, <i>Calidris canutus islandica</i> , W & Southern Africa (wintering) 7279 individuals, representing an average of 1.6% of the population (5-year peak mean 1998/9-2002/3)		
	• Dunlin, <i>Calidris alpina alpina</i> , W Siberia/W Europe 15171 individuals, representing an average of 1.1% of the population (5-year peak mean 1998/9-2002/3)		
	• Common redshank, Tringa totanus totanus, 1178 individuals, representing an average of 1% of the GB population (5-year peak mean 1998/9- 2002/3)		
	Contemporary data and information on waterbird trends at this site and their regional (sub- national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually		

Threats and Pressures at European site which may be affected by the Plan⁸:

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

The Swale SPA⁹

Conservation objectives:

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

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

Qualifying features:

A046a Branta bernicla bernicla; Dark-bellied brent goose (Non-breeding)

A149 Calidris alpina alpina; Dunlin (Non-breeding)

⁹ Natural England (2019) The Swale SPA Conservation Objectives. Available at: http://publications.naturalengland.org.uk/publication/5745862701481984 [Date accessed 24/06/24].

⁸ JNCC. (2008) Information Sheet on Ramsar Wetlands (RIS). Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11040.pdf [Date Accessed: 24/06/24].

The Swale SPA⁹

Breeding bird assemblage

Waterbird assemblage

Threats and pressures at European site which may be affected by the Plan¹⁰:

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

The Swale Ramsar¹¹

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

Ramsar Criterion	Justification for the application of each criterion			
2	The site supports nationally scarce plants and at least seven British Red data book invertebrates			
5	Assemblages of international importance: Species with peak counts in winter: 77501 waterfowl (5-year peak mean 1998/99-2002/2003)			
6	 Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: Common redshank, <i>Tringa totanus totanus</i>, 1712 individuals, representing an average of 1.4% of the GB population (5-year peak mean 1998/9-2002/3) Species with peak counts in winter: Dark-bellied brent goose, <i>Branta bernicla bernicla</i>, 1633 individuals, representing an average of 1.6% of the GB population (5-year peak mean 1998/9-2002/3) Grey plover, <i>Pluvialis squatarola</i>, E Atlantic/W Africa -wintering 2098 individuals, representing an average of 3.9% of the GB population (5-year peak mean 1998/9-2002/3) Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in spring/autumn: Ringed plover, <i>Charadrius hiaticula</i>, Europe/Northwest Africa 917 individuals, representing 			
	an average of 1.2% of the population (5-year peak mean 1998/9- 2002/3) Species with peak counts in winter:			

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¹⁰ Natural England (2014) Site Improvement Plan Greater Thames Complex Available at: <u>http://publications.naturalengland.org.uk/publication/6270737467834368</u> [Date accessed 24/06/24].

¹¹ Natural England (2005) Information Sheet on Ramsar Wetlands: The Swale Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11071.pdf [Date Accessed 24/06/24].

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Ramsar Criterion	Justification for the application of each criterion			
	• Eurasian wigeon, <i>Anas penelope</i> , NW Europe 15296 individuals, representing an average of 1% of the population (5-year peak mean 1998/9- 2002/3)			
	• Northern pintail, <i>Anas acuta</i> , NW Europe 763 individuals, representing an average of 1.2% of the population (5-year peak mean 1998/9- 2002/3)			
	• Northern shoveler, <i>Anas clypeata</i> , NW & C Europe 483 individuals, representing an average of 1.2% of the population (5-year peak mean 1998/9- 2002/3)			
	• Black-tailed godwit, <i>Limosa limosa islandica</i> , Iceland/W Europe 1504 individuals, representing an average of 4.2% of the population (5-year peak mean 1998/9-2002/3)			
	Contemporary data and information on waterbird trends at this site and their regional (sub- national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually			
	annually			

Threats and Pressures at European site which may be affected by the Plan¹²:

None identified within The Swale Ramsar Information Sheet.

North Downs Woodlands SAC13

Conservation objectives:

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

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

Qualifying features:

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

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

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

*Priority natural habitats or species.

Threats and pressures at European site which may be affected by the Plan¹⁴:

- Public Access / Disturbance
- Air Pollution Nitrogen deposition

¹² Natural England (2005) Information Sheet on Ramsar Wetlands: The Swale Available at: <u>https://rsis.ramsar.org/RISapp/files/RISrep/GB299RIS.pdf</u> [Date accessed 24/06/24].

¹³ Natural England (2018) North Downs Woodlands SAC Conservation Objectives Available at: http://publications.naturalengland.org.uk/publication/5717001544663040 [Date accessed 24/06/24].

¹⁴ Natural England (2015) Site Improvement Plan North Downs Woodlands Available at: http://publications.naturalengland.org.uk/publication/6363401429188608 [Date accessed 24/06/24].

Queendown Warren SAC¹⁵

Conservation objectives:

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

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

Qualifying features:

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

* Denotes a priority natural habitat or species

Threats and pressures at European site which may be affected by the Plan¹⁶:

- Air Pollution Nitrogen deposition
- Habitat Fragmentation

Peters Pit SAC¹⁷

Conservation objectives:

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

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

Qualifying features:

S1166. Triturus cristatus; Great crested newt

Threats and pressures at European site which may be affected by the Plan¹⁸:

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

¹⁶ Natural England (2015) Site Improvement Plan: Queendown Warren Available at:

¹⁷ Natural England (2018) Peter's Pit SAC Conservation Objectives Available at:

¹⁵ Natural England (2018) Queendown Warren SAC Conservation Objectives Available at:

http://publications.naturalengland.org.uk/publication/5977332179271680 [Date accessed 24/06/24].

http://publications.naturalengland.org.uk/publication/4943746697265152 [Date accessed 24/06/24].

http://publications.naturalengland.org.uk/publication/4817478370721792 [Date accessed 24/06/24].

¹⁸ Natural England (2018) Peter's Pit SAC SIP. Available at:

https://publications.naturalengland.org.uk/publication/5643865918799872 [Date Accessed: 24/06/24].

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

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

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

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

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

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

Vision and Spatial Development Strategy

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
N / A	A Vision for Medway in 2041	This policy sets out the vision for Medway. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	A – screen out
N/ A	Spatial Development Strategy	This policy sets out the spatial strategy for development in Medway. Whilst no details regarding development are identified within the policy, it does support waterfront redevelopment. A number of waterfront areas in Medway are located within, or close to, the IRZ SSSI associated with the North Kent Estuary and Marshes SPA or Ramsar designations, or adjacent to priority habitat associated with them. It is possible therefore that there may be direct or indirect recreation and urbanisation LSEs upon either these designations or associated areas of FLL. This will be addressed in further detail in the HRA process.	F – screen in L

Communities, Infrastructure and Health

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
Policy S23	Infrastructure Delivery	This policy sets out expectations for development to deliver appropriate infrastructure and circumstances where planning permission would be granted. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy DM22	Digital Communications	This policy sets out requirements for new development in relation to digital communications. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out

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Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
Policy T12	Learning and Skills Development	This policy sets out development which the Council will support in terms of learning and skills development. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T28	Existing open space and playing pitches	This policy sets out the provisions for existing open space and playing pitches. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy DM21	New open space and playing pitches	This policy sets out the requirements for new development in terms of open space and playing pitches. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy S13	Supporting Medway's Culture and Creative Industries	This policy sets out development proposals which will be supported to enhance continued growth of cultural infrastructure across Medway. No location or other details regarding development are identified within the policy. It does not therefore directly trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy S9	Star Hill to Sun Pier	This policy sets out requirements for planning applications within the Chatham Intra area. Whilst no location or other details regarding development are identified within the policy, it does support the extension of a continuous riverside route from Rochester to Chatham and new waterfront development. Chatham Intra is not located within or adjacent to any European site or within the IRZ SSSI associated with the Medway Estuary and Marshes SPA or Ramsar. Given the presence of mudflat priority habitat however adjacent to this area, it is possible that there may be indirect recreation and urbanisation LSEs upon FLL. This will be addressed in further detail in the HRA process.	F – screen in L
Policy T29	Community and Cultural Facilities	This policy sets out the provisions for safeguarding community and cultural facilities. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T27	Reducing Health Inequalities and Supporting Health and Wellbeing	This policy sets out requirements for new development to support health and wellbeing. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out

Employment

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
Policy S9	Economic Strategy	 This policy sets out broad areas for the direction of employment development in Medway, including employment sites reflecting outputs from an Employment Land Needs Assessment (2020). It also sets out proposed use at each employment site. A number of these broad areas are located immediately adjacent to the Medway Estuary and Marshes SPA and Ramsar sites. These sites include those at Kingsnorth and Grain on the Hoo Peninsula and Chatham Dock. Development close to these sensitive sites has the potential for LSEs listed below alone and will be screened in for consideration in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	I – screen in
Policy S10	Existing Employment Provision	This policy sets out provisions for safeguarding employment sites. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in- combination.	F – screen out
Policy S11	New Employment Sites	This policy sets out allocation locations for the promotion of new employment sites. It also sets out criteria for employment uses. This policy triggers development and change with the potential for the following LSEs at European sites alone which will be considered in the HRA process:	I – screen in

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
		 Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. 	
		 Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. 	
		 Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	
Policy S12	Innovation Park Medway	This policy sets out employment uses that will be supported for Innovation Park Medway. This policy triggers development and change with the potential for the following impact pathways cumulatively with other development set out in the Local Plan and also in-combination with development in neighbouring LPA areas:	
		 Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. 	L – screen in
		 Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. 	
Policy T13	Tourism, Culture and Visitor Accommodation	This policy sets out criteria for new tourism, culture and visitor accommodation employment development. It does not however provide locational or quantum information. This policy sets out criteria for development but does not in itself directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T14	Rural Economy	This policy sets out criteria for employment development in rural locations. It does not however provide locational or quantum information. This policy does therefore not in itself directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out

Environment

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
N / A	Spatial Development Strategy	The spatial development strategy aims to deliver sustainable development in Medway to 2041. It does not trigger development or any change which would result in a LSE on any European site.	A – screen out
Policy S3	North Kent Estuary and Marshes Designated Sites	This policy provides proposals intended to avoid or reduce harmful effects on European sites and has therefore been screened into the HRA process to ensure compliance with case law around consideration of mitigation measures (People Over Wind).	M – screen in
Policy S2	Conservation and Enhancement of the Natural Environment	This policy provides plan-wide environmental protection to international, national and locally designated wildlife sites.	D – screen out
Policy S4	Landscape Protection and Enhancement	This policy provides plan-wide environmental protection to landscape features.	D – screen out
Policy S5	Securing Strong Green and Blue Infrastructure	 This policy is positive in nature and will protect the network of green infrastructure across Medway. This policy also seeks to 'promote and enhance the public rights of way network, including national trails, long distance paths and the wider footpath network, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside, and other cross border links'. The promotion of such links has the potential to introduce recreation into new areas. Where introduced in sensitive locations, this policy would have the potential to increase recreational pressure at European sites when considered cumulatively with other public access and disturbance effects which may result from local plan growth. Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and the North Downs Woodlands SAC. 	L – screen in
Policy S6	Kent Downs National Landscape	This policy provides plan-wide environmental protection to the Kent Downs National Landscape.	D – screen out
Policy S7	Green Belt Policy	This policy sets out requirements in terms of green belt in relation to new development. It will not trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy DM2	Contaminated Land	This policy provides plan-wide environmental protection in relation to contaminated land.	D – screen out

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Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category	
Policy DM3	Air Quality	This policy provides plan-wide environmental protection in relation to the protection of air quality, both in terms of habitats and human health.	D – screen out	
Policy DM4	Noise and Light Pollution	This policy provides plan-wide environmental protection in relation to the protection of air quality, both in terms of habitats and human health.	D – screen out	
Policy DM1	Flood and Water Management	This policy sets out requirements for new development to reduce flood risk, promote water efficiency measures, and protect and enhance water quality. This policy does not trigger development but provides positive plan wide environmental protection for the water environment.	D – screen out	
Policy S1	Planning for Climate Change	This policy sets out requirements for new development to plan for climate change. This policy does not trigger development but provides positive plan wide environmental protection.	D – screen out	
Policy S24	Policy S24	Energy Supply	This policy sets out suitable locations (Kingsnorth and the Isle of Grain) for low carbon energy and renewable development along with criteria which must be met. These locations are adjacent to the Medway Estuary and Marshes SPA and Ramsar designations and also close to the Thames Estuary and Marshes SPA and Ramsar and Swale SPA and Ramsar.	
			 This policy triggers development and change with the potential for the following LSEs at European sites alone which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. 	I – screen in
		 Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 		
Policy T41	Heat Networks	This policy sets out the requirement for new development to follow the heat network provision hierarchy. It does not therefore trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out	

Heritage and Design

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
Policy T1	Promoting High Quality Design	This policy sets out design requirements for new proposals. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy S8	Historic Environment	This policy sets out commitments to the conservation, enhancement and enjoyment of the historic environment.This policy does not trigger development but provides positive plan wide environmental protection for the historical environment.	D – screen out
Policy DM9	Heritage Assets	This policy sets out requirements for new development to protect heritage assets. This policy does not trigger development but provides positive plan wide environmental protection for the historical environment.	D – screen out
Policy DM10	Conservation Areas	This policy sets out requirements for new development to protect and enhance Conservation Areas. This policy does not trigger development but provides positive plan wide environmental protection for the historical environment.	D – screen out
Policy DM11	Scheduled Monuments and Archaeological Sites	This policy sets out requirements for new development to protect Scheduled Monuments and archaeological sites. This policy does not trigger development but provides positive plan wide environmental protection for the historical environment.	D – screen out
Policy DM6	Sustainable Design and Construction	This policy sets out standards for sustainable design and construction of new development. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy DM5	Housing Design	This policy sets out standards for housing design at new development. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out

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Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
Policy DM7	Shopfront Design and Security	This policy sets out requirements for development of shop frontages. This policy does not trigger development and would have no LSE upon any European site alone or in- combination.	F – screen out
Policy DM8	Advertisements	This policy sets out requirements for advertisements. This policy does not trigger development and would have no LSE upon any European site alone or in- combination.	F – screen out

Housing

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
Policy T2	Housing Mix	This policy sets out development requirements in respect of housing mix. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T3	Affordable Housing	This policy sets out development requirements in respect of affordable housing. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T4	Supported Housing, Nursing Homes and Older Person Accommodation	This policy sets out development requirements in respect of supported housing nursing homes and old person accommodation. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T5	Student Accommodation	This policy sets out development requirements in respect of student accommodation. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T6	Mobile Home Parks	This policy sets out development requirements in respect of mobile home parks. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
Policy T7	Houseboats	 This policy sets out the Council's commitment to manage provisions for houseboats. Given the presence of coastal / river designated European sites in proximity to existing houseboat sites, this policy may have potential likely significant effects at a European site when considered cumulatively with other development proposed within the Local Plan as follows: Hydrology (water quality) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. Recreational impacts – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar. Urbanisation impacts - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA. 	L – screen in
Policy T8	Houses of Multiple Occupation	This policy sets out development requirements in respect of HMO. It will not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T9	Self-Build and Custom Housebuilding	 This policy sets out development requirements in respect of self-build and custom build housing and identifies allocations (assessed in Appendix C). This policy supports development which has the potential for LSEs as follows: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. Recreational impacts – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar and North Downs Woodlands SAC. Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	L – screen in
Policy T10	Gypsy, Traveller & Travelling Showpeople	This policy sets out provisions for the protection and intensification of existing Gypsy, Traveller and Travelling Showpeople sites. It sets out the level of need, with existing sites noted. It also provides	L – screen in

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Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
		a set of development criteria that must be met for any new sites. This policy supports development which has the potential for LSEs as follows:	
		 Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. 	
		 Recreational impacts – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar and North Downs Woodlands SAC. 	
		 Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. 	
		 Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	
Policy T11	Small Sites and SME Housebuilders	This policy sets out provisions for development of small sites and SME housebuilders. It does not provide locational specific information in respect of new sites or any information regarding the quantum of development for new sites. However, it does set out development criteria that must be met for any new sites. It does not therefore directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out

Minerals Supply

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category
N / A	Vision for Minerals Supply	This policy sets out the vision for minerals supply in Medway. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	A – screen out

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

Retail and Town Centres

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
Policy S14	Town Centres	This policy sets out requirements for development in town centres. It does not however provide locational or quantum information. This policy does therefore not in itself directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or incombination.	F – screen out
Policy S15	Hierarchy of Centres	This policy details the hierarchy of centres based on their role, function and scale. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T15	Sequential Assessment	This policy sets out requirements in relation to sequential assessment for retail development where not in accordance with the development plan. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or incombination.	F – screen out
Policy T16	Ancillary Development	This policy sets out criteria for ancillary development for retail and town centres. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T17	Impact Assessment	This policy sets out impact assessment criteria for proposals that seek to provide or expand retail and leisure uses in edge or out of centre locations. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in- combination.	F – screen out
Policy S16	Chatham Town Centre	 This policy sets out criteria which development in Chatham Town Centre must meet. It also sets out a number of opportunity sites for development. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. 	L - screen in

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Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
		 Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and the North Downs Woodlands SAC. 	
Policy S17	Rochester District Centre	 This policy sets out criteria which development in Rochester District Centre must meet. It also sets out a number of opportunities for development. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	L - screen in
Policy S18	Gillingham District Centre	 This policy sets out criteria which development in Gillingham District Centre must meet. It also sets out a number of opportunities for development. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar. 	L - screen in

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

F – screen out

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
		 This policy sets out criteria which development in Hoo St Werburgh must meet. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes 	
Policy S21	Hoo Peninsula	SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered.	L - screen in
		 Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. 	
		 Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	
		This policy sets out criteria for retail development in Hempstead Valley District Centre. Proposals for additional development have the potential for the following LSEs at European sites in-combination which will be considered in the HRA process:	
Policy S22	Hempstead Valley District Centre	 Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. 	L - screen in
		• Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar.	
Policy DM12	Local and Rural Centres	This policy sets out criteria which development in local and rural centres must meet. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T18	Shopping Parades and Neighbourhood Centres	This policy sets out criteria which development at shopping parades and neighbourhood centres must meet. This policy does not directly trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
		This policy sets out criteria which development defined as meanwhile/temporary/pop-up use must	

meet. This policy does not directly trigger a change or development which could lead to a likely

significant effect at any European site, either alone or in-combination.

Meanwhile Uses

Policy T19

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Policy Reference Policy name Justification: Activities that may result in a LSE on a European site. Screening category This policy sets out tests for development at Medway Valley Leisure Park. This policy does not Medway Valley Policy DM13 directly trigger a change or development which could lead to a likely significant effect at any F – screen out Leisure Park European site, either alone or in-combination. This policy sets out tests for development at Dockside. This policy does not directly trigger a change Policy DM14 or development which could lead to a likely significant effect at any European site, either alone or in-Dockside F – screen out combination.

Transport

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
N / A	Vision for Access and Movement in Medway	This policy sets out the vision for access and movement in Medway. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	A – screen out
Policy DM15	Monitoring and Managing Development	This policy sets requirements for new development to lower vehicle trip generation and contribution to transport mitigations. This policy does not trigger a change or development which could lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T20	Riverside Path	 This policy sets out aspiration for a new riverside path or boardwalk along the River Medway, where possible, tying in with the England Coastal Path. The River Medway (and route of the existing England Coastal Path) is located close to the Medway and Thames Estuary and Marshes SPA and Ramsar sites and areas of FLL habitat associated with these. The creation of waterfront walking routes may have a likely significant effect on the European sites through the introduction of increased recreational pressure at these designations when considered cumulatively with other recreational and urbanisation LSEs which may result from local plan growth. Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA and Ramsar. 	L – screen in
Policy DM16	Chatham Waters Line	This policy sets out the aspiration for a new active travel corridor along the Chatham Waters Line and also at Gillingham Riverside. Gillingham Riverside area is located close to the Medway and Thames	L- screen in

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
		 Estuary and Marshes SPA and Ramsar sites and associated FLL. The creation of waterfront walking routes at this location may have a likely significant effect on the European sites through the introduction of increased recreational pressure at these designations when considered cumulatively with other recreational and urbanisation LSEs which may result from local plan growth. Recreational disturbance – Medway Estuary and Marshes SPA and Ramsar and Thames 	
		Estuary and Marshes SPA and Ramsar. This policy safeguards land for the Grain Branch Line. Allocations for new development are assessed in	
Policy DM17	Grain Branch Line	Appendix C. As this is a safeguarding policy it does not trigger development directly. As such it would not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T21	Riverside Infrastructure	This policy safeguards riverside infrastructure and sets out requirements for new infrastructure. Due to the sensitive location of this infrastructure close to the Medway and Thames SPA and Ramsar sites and potential associated areas of FLL, urbanisation effects are possible. This policy will therefore be screened in for further consideration in the HRA process.	L - screen in
Policy T22	Marinas and Moorings	This policy safeguards marina and mooring infrastructure and sets out requirements for new infrastructure. Due to the sensitive location of this infrastructure close to the Medway and Thames SPA and Ramsar sites and potential associated areas of FLL, urbanisation effects are possible. This policy will therefore be screened in for further consideration in the HRA process.	L - screen in
Policy T23	Aviation	This policy safeguards aviation facilities at Rochester Airport. This policy does not trigger development directly. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T24	Urban Logistics	This policy sets out requirements to resist loss of existing B8 use. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T25	User Hierarchy and Street Design	This policy sets out requirements in terms of user hierarchy and street design. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T26	Accessibility Standards	This policy sets out requirements for new development in terms of accessibility standards. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
Policy DM18	Transport Assessments, Transport Statements and Travel Plans	This policy sets out the requirement for development proposals to be supported by a Transport Assessment, Transport Statement and/or a commitment to provide a Travel Plan. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy DM19	Vehicle Parking	This policy sets out parking requirements for new development. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy DM20	Cycle Parking and Storage	This policy sets out cycle parking and storage requirements for new development. This policy does not trigger development. It would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out

Waste Management

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
N / A	Vision for Waste Management	This policy sets out the vision for waste management. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in- combination.	A – screen out
Policy DM23	Waste Prevention	This policy sets out requirements for waste prevention at new development. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T34	Safeguarding of Existing Waste Management Facilities	This policy sets out requirements to safeguard existing management facilities. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out

Appendix 4

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
Policy T35	Provision of Additional Waste Management Capacity	This policy sets out criteria for the development of additional waste management capacity. It does not trigger development or change and would therefore not lead to a likely significant effect at any European site, either alone or in-combination.	F – screen out
Policy T36	Location of Waste Management Facilities	 This policy specifies locations where waste management facilities may be considered. Proposals for additional waste facilities have the potential for the following LSEs at European sites which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	L - screen in
Policy T37	Other Recovery	 This policy provides criteria where energy from waste facilities will be supported. Proposals for energy from waste facilities have the potential for the following LSEs at European sites which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	L - screen in
Policy T38	Landfill	This policy provides criteria where non-inert landfill facilities will be supported.	L - screen in

Appendix 4

Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
		 Proposals for landfill facilities have the potential for the following LSEs at European sites which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	
Policy T39	Beneficial Use of Inert Waste by Permanent Deposit	 This policy provides criteria where proposals for the deposit of inert waste on land will be permitted. This type of waste disposal has the potential for the following LSEs at European sites which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	L - screen in
Policy T40	Wastewater Treatment	 This policy provides criteria where proposals for the upgrade or extension of wastewater treatment works. Water treatment has the potential for the following LSEs at European sites which will be considered in the HRA process: Air Quality - Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and the North Downs Woodlands SAC – both road and industrial pollution sources cumulatively will need to be considered. 	L - screen in

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Policy Reference	Policy name	Justification: Activities that may result in a LSE on a European site.	Screening category
		 Hydrology (water quality and water quantity) – Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar. Urbanisation effects – To include noise, visual and lighting impacts. Both directly on Medway Estuary and Marshes SPA and Ramsar and Thames Estuary and Marshes SPA, and upon areas of FLL. 	

Appendix C: Indicative Preferred Sites Screening Summary to inform Test of Likely Significance

Table Notes:

Air Quality LSEs: All indicative preferred sites set out in the Regulation 18 consultation (**Figure C.1**) have the potential to act cumulatively to increase traffic flows on the local road network. An increase in traffic related emissions have the potential to change air quality. Applying Natural England's screening thresholds, air quality Likely Significant Effects (LSEs) are considered possible at a number of European sites as a result of growth set out in the MLP. These sites include the Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and North Downs Woodlands SAC. As growth at all allocations has the potential to contribute cumulatively to a change in air quality in-combination with other plans and projects, all sites have been screened in under Category L.

Water Quality and Quantity LSEs: All indicative preferred sites set out in the Regulation 18 consultation have the potential to act in combination with one another to increase the quantity of water required for treatment at Wastewater Treatment Works (WwTWs). This may result in the deterioration of downstream water quality. Water abstraction for development also has the potential to change the quantity of water at hydrologically sensitive European sites. Taking a precautionary approach, hydrology impacts from the combined effect of all developments together, acting in-combination with other plans and projects have the potential to result in LSEs at downstream European sites and those in the MLP area (the Medway Estuary and Marshes SPA and Ramsar, the Thames Estuary and Marshes SPA and Ramsar, the Swale SPA and Ramsar and North Downs Woodlands SAC). As growth at all allocations has the potential to contribute cumulatively to a change in water resources and water quality in-combination with other plans and projects, all sites have been screened in under Category L.

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

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

Urbanisation effects LSEs: Urbanisation effects include impacts such as noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering, vandalism and fragmentation of habitat. A buffer of 400m has been applied to identify potential urbanisation effects on all European sites (**Figure C.4**).

Urbanisation effects on FLL LSEs. Development also has the potential for impacts upon functionally linked land (FLL) associated with the North Kent Estuary and Marshes European sites. The assessment presented in this appendix considers the suitability of habitat at each indicative preferred site, and also in the area surrounding it, to provide FLL on the basis of a desk-based assessment looking at the following factors:

- Distance from the European site (sites closer to an SPA and/or Ramsar site are more likely to provide roosting and /or foraging opportunities for birds).
- Site characteristics including details on:
 - Habitat type including historical knowledge (i.e. was the site recently suitable as FLL);
 - Cropping regime, including how often the site is planted with a suitable crop;
 - Visibility (for example are there unrestricted sight-lines);
 - Details of any field boundaries (trees/hedgerows/field drains);
 - Details of any permanent waterbodies, areas of seasonal flooding; and
 - The size of the site.

- Details of any existing factors (where available) that may affect the habitat suitability, including:
 - Existing public rights of way and their usage, especially by users with dogs;
 - Proximity to existing built up areas;
 - Existing farming practices (for example the use of bird scarers/deterrents);
 - Noise and visual disturbance including information on whether the area is subject to control through shooting or wildfowling; and
 - Presence of large and/or multiple overhead power lines.

Coastal squeeze LSEs: Consideration has been given to the location of indicative preferred sites in relation to required compensatory habitat (as set out in the Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (MEASS)¹ – **Figure C.5**). The two areas of relevance to the HRA include No. 2 – Abbots Court on the Hoo Peninsula and No. 13 – Danes Hill close to Riverside Country Park (see Figure 10 of the MEASS HRA² - copied below for ease of reference). Where the indicative preferred sites do not coincide with a compensatory habitat site this is denoted with an 'x'.

¹ Environment Agency (2019) Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Available at: <u>https://ea.sharefile.com/share/view/s53042b8483441048/foaa518c-77f9-4111-8a59-23a6f61add9c</u> [Date Accessed: 17/04/24].

² Environment Agency (2018) Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Report – Technical Appendix K – HRA. Available at: (<u>https://ea.sharefile.com/share/view/s53042b8483441048/foaa518c-77f9-4111-8a59-23a6f61add9c</u> [Date Accessed: 17/04/24].

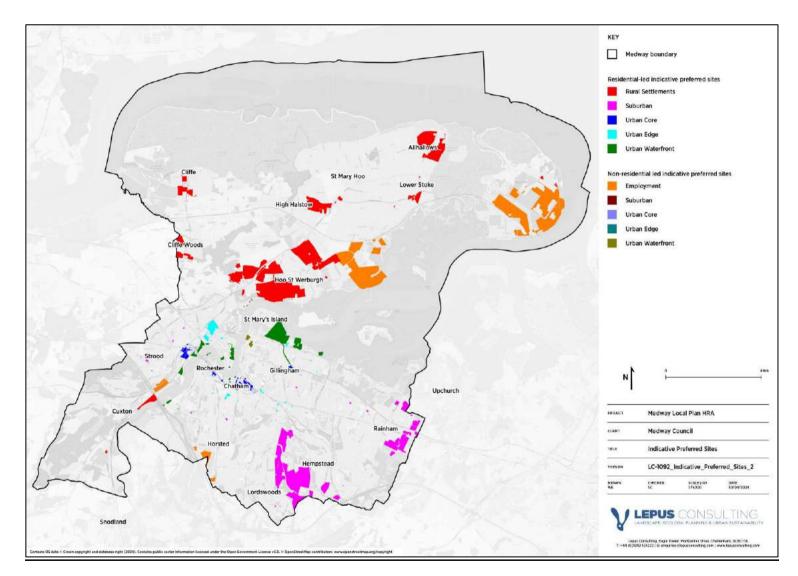
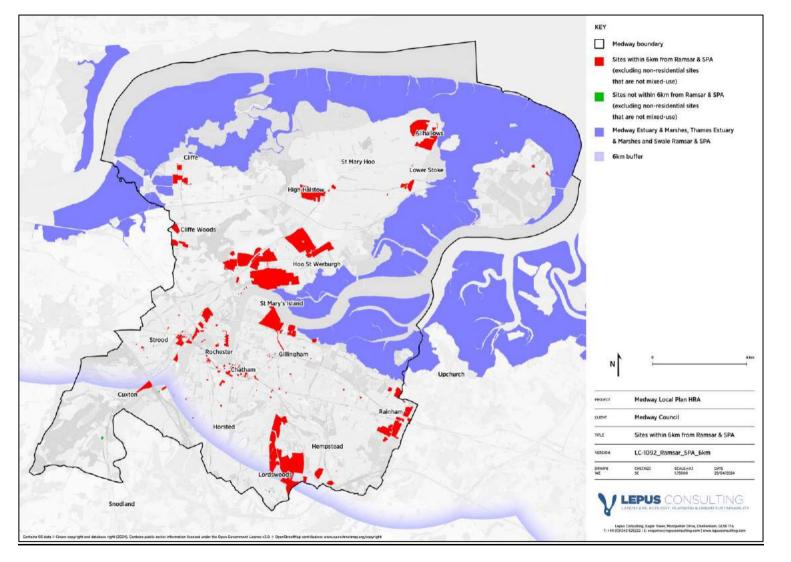


Figure C.1: Indicative preferred site location map





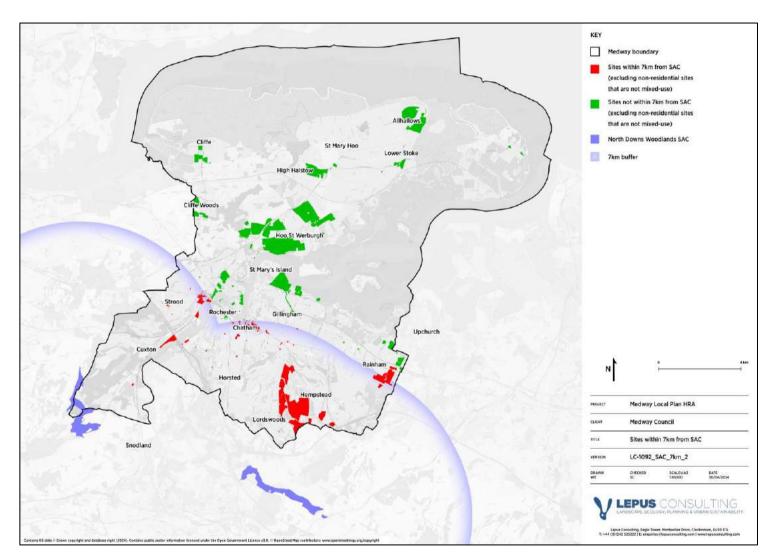
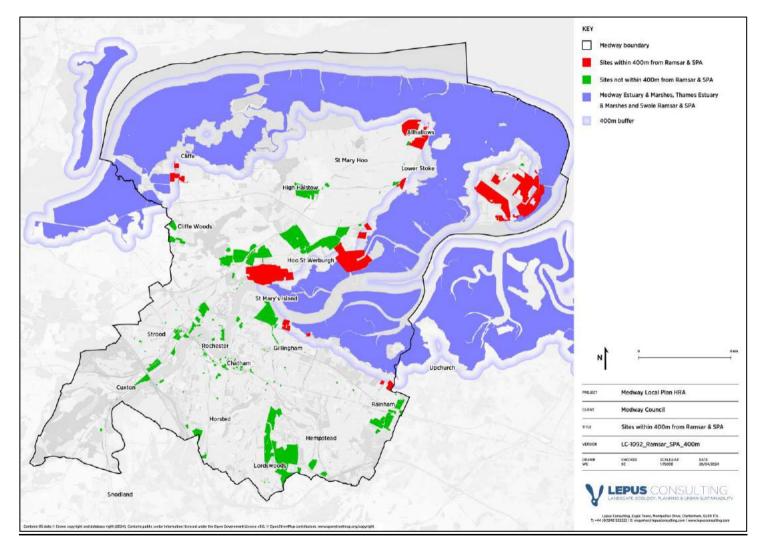


Figure C.3: 7km ZoI from North Downs Woodlands SAC

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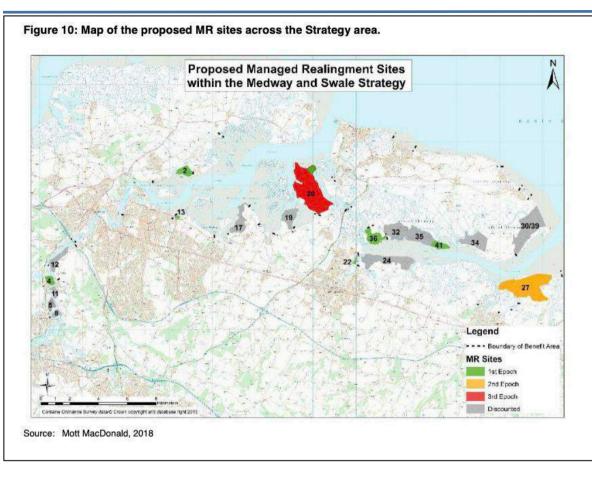


Figure C.5: Extract from MEASS showing areas of compensation habitat³

³ Environment Agency (2019) Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy. Available at: <u>https://ea.sharefile.com/share/view/s53042b8483441048/foaa518c-77f9-4111-8a59-23a6f61add9c</u> [Date Accessed: 17/04/24].

Non-Residential-Led Sites

Employment – non-residential led sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS24	Employment	158.602ha	n/a as employment site	The Medway Estuary and Marshes SPA and Ramsar sites are located immediately adjacent to the site. The Thames Estuary and Marshes SPA and Ramsar is also located approx. 200m to the east. Urbanisation effects are therefore likely.	 The Medway Estuary and Marshes SPA and Ramsar is located immediately adjacent to this site, with a small area of designated land extending into the site boundary. The Thames Estuary and Marshes SPA and Ramsar is located approx. 200m to the east. The site is located on the Isle of Grain and comprises a number of components including areas on the Isle of Grain CHP power station site, areas of the former power station and the Isle of Grain LNG facility. The site comprises hard standing with some grassed areas, coastal and floodplain grazing marsh, trees and buildings. All planning applications trigger the IRZ SSSI threshold given its proximity to designated sites and location within the North Kent Estuary and Marshes potential FLL area. There would loss of coastal and floodplain grazing marsh priority habitat within the site boundary (and a small area of deciduous woodland). There are no PRoWs on any component of this site. Considering the nature and location of the site, it is considered to provide suitable FLL. LSE from urbanisation effects on FLL are likely. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS26	Employment	85.250ha	n/a as employment site	The Medway Estuary and Marshes SPA and Ramsar sites are located immediately adjacent to the site. The Thames Estuary and Marshes SPA and Ramsar is located approx. 198m to the east. Urbanisation effects are therefore likely.	 The Medway Estuary and Marshes SPA and Ramsar is located immediately adjacent to this site, with a small area of designated land extending into the site boundary. The Thames Estuary and Marshes SPA and Ramsar is located approx. 198m to the east. The site is located on the Isle of Grain and comprises the Isle of Grain CHP power station site and areas of the former power station. The site comprises hard standing with some grassed areas and coastal floodplain grazing marsh and CHP buildings. Infrastructure from the power station remains. All planning applications trigger the IRZ SSSI threshold given its proximity to designated sites and location within the North Kent Estuary and Marshes potential FLL area. There would be a loss of a small area of coastal and floodplain grazing marsh priority habitat and patch of deciduous woodland within the site boundary. There are PRoWs running along the border of the site and through the eastern section. Considering the nature and location of the site, it is considered to provide suitable functionally linked land. LSE due to urbanisation effects on FLL. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CHR16	Mixed use	8.949ha	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Given the surrounding land use, it is considered that there will be no urbanisation LSE.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 5.7km to the east of the site. The site comprises an area of previously developed land within an urban setting to the south of the A228 and to the east of the M2. Urban development and road infrastructure are likely to provide a significant source of disturbance, with a railway running along the site's northern boundary. Land use is for general industrial storage or distribution. SSSI IRZ thresholds in relation to air emissions from industrial processes would need to be taken into consideration if relevant (precise end land use is not known at time of writing). There would be no loss of priority habitat. There is a PRoW which runs along the southern boundary of the site. Taking into account the nature and location of the site, it is not considered to provide suitable FLL. No LSE due to habitat loss / degradation or fragmentation of FLL are anticipated. 	x

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Site Pret Code	eferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CHR17 M	Aixed use	3.727ha	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is also located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Given the surrounding land use, it is considered that there will be no urbanisation LSE.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 5.6km to the east of the site. The site comprises an area of previously developed land within an urban setting to the south of the A228 and to the east of the M2. Urban development and road infrastructure is likely to provide a significant source of disturbance with a railway marking the site's southern boundary. Land use is for general industrial storage or distribution. SSSI IRZ thresholds in relation to air emissions from industrial processes would need to be taken into consideration if relevant (end land use is not known at time of writing). There is a small strip of deciduous woodland priority habitat in the far south western corner of the site which would be impacted. There are no PRoWs across the site. Taking into account the nature and location of the site, it is not considered to provide suitable FLL. No LSE due to habitat loss / degradation or fragmentation are anticipated. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CHR18	Employment	1.284ha	n/a as employment site	There are no European sites within 400m of the site. Given the surrounding land use, it is	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 5.6km to the east of the site. The site comprises an area of developed land within an urban setting to the south of the A228 and to the east of the M2. Urban development and road infrastructure is likely to provide a significant source of disturbance with a railway line marking the site's northern boundary. Land use is for general industrial storage or distribution. SSSI IRZ thresholds in relation to air emissions from industrial processes would need to be taken into consideration if relevant (end land use is not known at time of writing). There would be no loss of priority habitat. There is a PRoW which runs along the southern boundary of the site. Taking into account the nature and location of the site, it is not considered to provide suitable FLL. No LSE due to habitat loss / degradation or fragmentation are anticipated. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FH1	Employment	14.909ha	n/a as employment site	The Thames and Medway Estuary and Marshes SPA and Ramsar sites are located approximately 6km to the north west of this site.	This site is comprised of two land components in a highly urbanised setting. Given the distance of this site from the North Kent coastal designations and its urban and previously developed nature it is unlikely that there will be urbanisation LSEs upon any FLL.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH35	Employment	57.389ha	n/a as employment site	The Medway Estuary and Marshes SPA and Ramsar sites are located 919m (outside 400m) to the east of the site and therefore urbanisation effects are unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar is located 919m to the north and east of the site. This site is comprised of two parcels of land (which in turn are formed of a number of parcels of agricultural land) on the Hoo Peninsula to the west of Kingsnorth. There are some hedgerows around the agricultural fields, but these are not continuous and allow bird sight lines to the designated sites. To the immediate east and south of the site is industrial development at Kingsnorth which is likely to be a source of disturbance. There is a sand and gravel quarry to the south west of the site, which is likely to be another source of disturbance. All planning applications trigger the IRZ SSSI threshold given its proximity to designated sites and location within the North Kent Marshes potential FLL area. There would be no loss of priority habitat. There are two PRoW, one runs along the eastern boundary and the other runs along the western boundary. Taking into account the nature of this site and its location within the wider area on the Hoo Peninsula, it has potential to provide suitably FLL and urbanisation effects are likely.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH36	Employment	114.109ha	n/a as employment site	The Medway Estuary and Marshes SPA and Ramsar sites are located adjacent to the site. Urbanisation effects are therefore likely.	The Medway Estuary and Marshes SPA and Ramsar is located immediately adjacent to this site, with a small area of designated land extending into the site boundary. The site is previously developed on the site of the former Kingsnorth power station. The southern part of the site is hard standing with the northern area being grassed with scattered scrub and trees. There would be a loss of a small area of coastal and floodplain grazing marsh and deciduous woodland priority habitat. There are no PROW on site. All planning applications trigger the IRZ SSSI threshold given its proximity to designated sites and location within the North Kent Marshes potential FLL area. Taking into account the nature of this site and its location within the wider area on the Hoo Peninsula, it has potential to provide suitably FLL and urbanisation effects are likely.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH37	Employment	1.045ha	n/a as employment site	The Medway Estuary and Marshes SPA and Ramsar sites are located approximately 600m to the east of this site. Urbanisation effects are therefore not likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar is located 600m to the east of the site. This site is a brownfield previously developed area of land on the Hoo Peninsula situated in a developed setting adjacent to Amazon Hub units. A railway line runs along the site's northern perimeter with agricultural fields and hedgerows beyond this. The site is bound on all other sides by industrial development, which are likely to be a source of disturbance, with a small area of scrub to its immediate south west. All planning applications trigger the IRZ SSSI threshold given its proximity to designated sites and location within the North Kent Marshes potential FLL. There would be loss of coastal and floodplain grazing marsh. There are no PRoW on the site. Taking into account the nature of this site and its location within an urban setting its potential to provide FLL is unlikely, however due to its location within the North Kent Marshes potential FLL area there is potential for urbanisation impacts upon adjacent areas of FLL.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH38	Employment	9.154ha	n/a as employment site	The Medway Estuary and Marshes SPA and Ramsar sites are located approximately 45m to the east of this site. Urbanisation effects are therefore likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar is located 45m to the east of the site. This site is a brownfield previously developed area of land on the Hoo Peninsula situated in an urban setting adjacent to Amazon Hub units. A railway line runs along the site's northern perimeter with agricultural fields and hedgerows beyond this. The site is bound on all other sides by industrial development, which are likely to be a source of disturbance, with a small area of scrub to its immediate south west. All planning applications trigger the IRZ SSSI threshold given its proximity to designated sites and location within the North Kent Marshes potential FLL area. There would be loss of coastal and floodplain grazing marsh. There are no PRoW on the site. Taking into account the nature of this site and its location within an urban setting its potential to provide FLL is unlikely, however due to its location within the North Kent Marshes potential FLL area there is potential for urbanisation impacts upon adjacent areas of FLL.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH39	Employment	5.910ha	n/a as employment site	The Medway Estuary and Marshes SPA and Ramsar sites are located approximately 120m to the east of this site. Urbanisation effects are therefore likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar is located 120m to the east of the site. This site is a brownfield previously developed area of land on the Hoo Peninsula situated in an urban setting adjacent to Amazon Hub units. A railway line runs to the north of the site with agricultural fields and hedgerows beyond this. The site is bound on the west and east by industrial development, which is likely to be a source of disturbance, with an area of reedbeds and coastal and floodplain grazing marsh to its immediate south. All planning applications trigger the IRZ SSSI threshold given its proximity to designated sites and location within the North Kent Marshes potential FLL area. There would be no direct loss of priority habitat. There are no PRoWs on the site. Taking into account the nature of this site and its location urbanisation impacts upon FLL are possible.	X
RWB5	Employment	1.617ha	n/a as employment site	The Thames and Medway Estuary and Marshes SPA and Ramsar sites are located just over 6km to the north west of this site.	This site comprises an area of scrub land within a highly urbanised area. Given the distance of this site from the North Kent coastal designations and its urban and previously developed nature it is unlikely that there will be urbanisation LSEs upon any FLL.	x

Suburban – non-residential-led sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HW5	Mixed use	10.366ha Hempstead Valley Shopping Centre - the proposal only relates to part of the site. Care home 1,858 sqm of commercial floorspace. 266 residential unit	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4.7km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This is part of the Hempstead shopping area. It is surrounded by urban development. Given the location and nature of this site and small scale development, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB12	Mixed Use	0.176ha	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of trees in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

Urban Core – non-residential led sites

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB15	Mixed Use	0.337ha 60 dwellings	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB10	Employment	0.139ha	n/a as employment site	There are no European sites within 400m of the site. The surrounding land use is urban in nature. There are no sight lines from this land to European designation. It is therefore considered that there will be no urbanisation LSE.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located over 4km to the north east. The current and surrounding land use is urban and developed. There will be no loss of priority habitat. There are no PRoWs across the site. It does not sit within a FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature and location of the site, it is unlikely to provide FLL or have any urbanisation effects upon FLL.	X

June 2024

Medway Local Plan HRA Report

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB23	Employment	0.143ha	n/a as employment site	There are no European sites within 400m of the site. The surrounding land use is urban in nature. There are no sight lines from this land to European designation. It is therefore considered that there will be no urbanisation LSE.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located over 3.8km to the north east. The current and surrounding land use is urban and developed. There will be no loss of priority habitat. There are no PRoWs across the site. It does not sit within a FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature and location of the site, it is unlikely to provide FLL or have any urbanisation effects upon FLL.	x

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR30	Mixed Use	0.56ha 102 residential units	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.6km to the northeast of the site. The site comprises an area of developed land within an industrial area. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB25	Employment	2.636ha	n/a as employment site	There are no European sites within 400m of the site. The surrounding land use is urban in nature. There are no sight lines from this land to European designation. It is therefore considered that there will be no urbanisation LSE.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.9km to the north east. The current and surrounding land use is urban, with the site located on the southern bank of the River Medway. There will be loss of broadleaved woodland priority habitat. There are no PRoWs across the site. The site does not sit within a FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature and location of the site, it is unlikely to provide FLL or have any urbanisation effects upon FLL.	x

Urban Waterfront – non-residential led sites

June 2024

Medway Local Plan HRA Report

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB35	Employment	2.7ha	n/a as employment site	There are no European sites within 400m of the site. The surrounding land use is urban in nature. There are no sight lines from this land to European designation. It is therefore considered that there will be no urbanisation LSE.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 2km to the east. The current and surrounding land use is urban, with the site located on the southern bank of the River Medway immediately adjacent to mudflat priority habitat. There will be no loss of priority habitat. There are no PRoWs across the site. The site does not sit within a FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature and location of the site, it is unlikely to provide FLL or have any urbanisation effects upon FLL.	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP11	Mixed use	0.585ha 158 dwellings	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.3km to the east of the site. The site comprises an area of developed land within an urban setting surrounded on all sides by existing development. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SM16	Employment	57.714ha 3000 residential units	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 610m to the northeast of the site, on the opposite side of the River Medway. The site comprises an area of currently developed land at Chatham Marina on the southern bank of the River Medway. Urban development and transport infrastructure locally is likely to provide a significant source of disturbance. A small area of the site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however there is some mudflat priority habitat to the northeast of the site. Given the scale of development at this location and proximity of mudflat habitat, potential impacts upon areas of FLL are screened in. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR31	Mixed use	1.386ha 311 residential units	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.3km to the east of the site. The site comprises an area of developed land within an urban setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however the site is located immediately adjacent to mudflat priority habitat. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR36	Mixed use	2.251ha 5 residential units	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.5km to the east of the site. The site comprises an area of developed land within an urban setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be loss of priority mudflat habitat which is associated with the North Kent Estuary and Marshes designations. Given the scale of development (5 dwellings), location and nature of this site, it is unlikely to have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	Χ

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR37	Mixed use	1.891ha 428 residential units	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.9km to the east of the site. The site comprises an area of developed land within an urban setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR38	Mixed use	1.315ha 5 - 100 residential units	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.9km to the east of the site. The site comprises an area of developed land within an urban setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be loss of priority mudflat habitat which is associated with the North Kent Estuary and Marshes designations. Given the scale of development (5 dwellings), location and nature of this site, it is unlikely to have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR40	Mixed use	0.872ha 200 residential dwellings	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.9km to the east of the site. The site comprises an area of developed land within an urban setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the scale of development, location and nature of this site, it is unlikely to have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

Residential-led sites

Rural Settlements – Residential-led sites

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS10	Residential	5	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	There are no European sites within 400m of the site. There are residential areas between the allocation and the Medway Estuary and Marshes SPA and Ramsar and therefore no direct sight lines to the south or east. It is therefore considered that there will be no direct urbanisation LSE on the designations themselves.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 630m to the southeast. The site is located on the Hoo Peninsula and is currently developed. The surrounding land use comprises residential areas and agricultural fields There will be no loss of priority habitat. There are no PRoWs across the site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Whilst the site is unlikely to provide FLL itself, considering its location, development has the potential to have urbanisation effects upon areas of FLL. 	X

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Appendix 4

Site Preferred Code	use Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS11 Resident	al 10	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	There are no European sites within 400m of the site. There are residential areas between the allocation and the Medway Estuary and Marshes SPA and Ramsar and therefore no direct sight lines to the south or east. It is therefore considered that there will be no direct urbanisation LSE on the designations themselves.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 630m to the southeast. The site is located on the Hoo Peninsula and is an arable field. The surrounding land use comprises residential areas and agricultural fields There will be no loss of priority habitat. There are no PRoWs across the site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Whilst the site is unlikely to provide FLL itself, considering its location, development has the potential to have urbanisation effects upon areas of FLL.	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS14	Residential	60	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	There are no European sites within 400m of the site, however it is located approx. 430m from the Medway Estuary and Marshes SPA and Ramsar. Taking a precautionary approach urbanisation LSEs are screened in.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 430m to the south. The site is located on the Hoo Peninsula and an arable field. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. A PRoW marks the site's western boundary. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are unlikely due to the presence of residential areas and infrastructure (A228) to the south of the site. However, taking into account the nature of this site and its location urbanisation impacts upon FLL are possible and screened in. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS15	Residential	9	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway Estuary and Marshes SPA and Ramsar is located within 400m of this allocation and urbanisation LSEs are therefore screened in.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 315m to the south. The site is located on the Hoo Peninsula and is part developed and part arable field. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. There are no PRoW on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are unlikely due to the presence of residential areas and road infrastructure to the south of the site. However, taking into account the nature of this site and its location urbanisation impacts upon FLL are possible and screened in. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS16	Residential	25	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	There are no European sites within 400m of the site, however it is located approx. 430m from the Medway Estuary and Marshes SPA and Ramsar. Taking a precautionary approach urbanisation LSEs are screened in.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 430m to the south. The site is located on the Hoo Peninsula and is part developed and part arable field. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. There are no PRoW on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are unlikely due to the presence of residential areas and road infrastructure (A228) to the south of the site. However, taking into account the nature of this site and its location urbanisation impacts upon FLL are possible and screened in. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS17	Residential	100	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway Estuary and Marshes SPA and Ramsar is located within 400m of this allocation and urbanisation LSEs are therefore screened in.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 127m to the south. The site is located on the Hoo Peninsula and is comprised of arable fields. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. There are no PRoW on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are likely and taking into account the nature of this site and its location urbanisation impacts upon FLL are possible and therefore screened in.	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS18	Residential	35	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which is located approx. 783m to the east. The site is located on the Hoo Peninsula and is comprised of an arable field. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. There are no PRoW on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are likely and taking into account the nature of this site and its location urbanisation impacts upon FLL are possible and therefore screened in.	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS2	Residential	4	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 2.6km to the southeast. The site is developed and located on the Hoo Peninsula. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. There are no PRoWs on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are likely to be obscured by arable field hedgerows, however, and taking a precautionary approach and into account the location of this site urbanisation impacts upon FLL are possible and therefore screened in.	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS21	Residential	75	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Thames Estuary and Marshes SPA and Ramsar sites are located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened in.	 The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which is located approx. 305m to the north. The site is comprised of arable fields located on the Hoo Peninsula. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. A PRoW marks the site's northern boundary. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are unlikely due to the presence of residential development to the east of the site and hedgerows in arable fields to the north and west. However, taking a precautionary approach, and given its location, urbanisation impacts upon FLL are possible and are therefore screened in. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS22	Residential	100	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Thames Estuary and Marshes SPA and Ramsar sites are located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened in.	 The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which is located approx. less than 20m to the east. The site is comprised of two arable fields located on the Hoo Peninsula. The surrounding land use comprises residential areas and agricultural fields. There will be loss of a small area of coastal and floodplain grazing marsh priority habitat. There are no PRoWs on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are possible due its proximity, therefore urbanisation impacts upon FLL are screened in. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS23	Residential	Holiday park or a static caravan community for older people	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Thames Estuary and Marshes SPA and Ramsar sites are located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened in.	The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which is located approx. 150m to the east. The site is comprised of previously developed land and the Allhallows Golf Course and is located on the Hoo Peninsula. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. There are no PRoWs on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are possible due its proximity, therefore urbanisation impacts upon FLL are screened in.	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS25	Residential	15	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which are located approx. 741m to the east. The site comprises previously developed land and is located on the Hoo Peninsula. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. There are no PRoWs on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are unlikely due to the presence of field boundaries, scrub to the east and also residential development. However, taking a precautionary approach and due to its location in the SSSI IRZ, urbanisation impacts upon FLL are screened in. 	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS28	Residential	9	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened in.	 The closest European sites are the Medway and Thames Estuary and Marshes SPA and Ramsar which are located approx. 200m to the east. The site comprises a greenfield and is located on the Hoo Peninsula. The surrounding land use comprises residential areas, agricultural fields, scrub and coastal and floodplain grazing marsh. There will be no loss of priority habitat. There is a PRoW which runs down the site's eastern boundary. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are likely due to its proximity. However, taking a precautionary approach and due to its location in the SSSI IRZ, urbanisation impacts upon FLL are screened in. 	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS29	Residential	7	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	The closest European sites are the Medway and Thames Estuary and Marshes SPA and Ramsar which are located approx. 890m to the east. The site comprises a greenfield and is located on the Hoo Peninsula. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. There are no PRoWs on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are unlikely due to the presence of arable field margins and residential development. Urbanisation impacts upon FLL are therefore screened in.	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
AS6	Residential	40	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 2.7km to the southeast. The site is a greenfield and parking area and is located on the Hoo Peninsula. The surrounding land use comprises residential areas beyond which are agricultural fields. There will be no loss of priority habitat. There are no PRoWs on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are likely to be obscured by arable field hedgerows and residential areas, however, and taking a precautionary approach and the location of this site, urbanisation impacts upon FLL are possible and therefore screened in. 	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CHR11	Residential	8	This site is located within 7km of North Downs Woodlands SAC (which is approx. 3km to its west). Recreational LSEs are therefore likely. It is not located within 6km of the North Kent Estuary or Marshes designations and therefore Bird Wise does not apply.	This allocation is not located within 400m of any European site.	The allocation is more than 6km from the North Kent Estuary and Marshes designated sites. The site is developed, and the surrounding land use is a mixture of residential and woodland. Considering the nature and location of this site, it is unlikely to provide FLL or have any urbanisation effects upon FLL.	X
CHR14	Residential	49	This site is located within 7km of North Downs Woodlands SAC (which is approx. 4km to its west). Recreational LSEs are therefore likely. It is not located within 6km of the North Kent Estuary or Marshes designations and therefore Bird Wise does not apply.	This allocation is not located within 400m of any European site.	 The allocation is more than 6km from the North Kent Estuary and Marshes designated sites. The site is developed as a car park with an area to the east comprising two bodies of water and areas of coastal saltmarsh. The site is located on the banks of the River Medway adjacent to mudflat priority habitat and other areas of coastal saltmarsh. A railway line marks the site's northern boundary. Considering the nature and location of this site, it is unlikely to provide FLL or have any urbanisation effects upon FLL. However, taking a precautionary approach, and due to the location of coastal saltmarsh and mudflats on this site it has been screened in as potentially providing FLL along the banks of the River Medway. 	X

Appendix 4

June 2024

Medway Local Plan HRA Report

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CHR6	Residential	88	This site is located within 7km of North Downs Woodlands SAC (which is approx. 2.3km to its west). Recreational LSEs are therefore likely. It is not located within 6km of the North Kent Estuary or Marshes designations and therefore Bird Wise does not apply.	This allocation is not located within 400m of any European site.	The allocation is more than 6km from the North Kent Estuary and Marshes designated sites. The site is developed, and the surrounding land use is a mixture of residential with St Andrew's Lake to its south west. Considering the nature and location of this site, it is unlikely to provide FLL or have any urbanisation effects upon FLL.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH11	Residential	200	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 1.2km to the south. The site is an agricultural field and is located on the Hoo Peninsula. The surrounding land use comprises residential areas and agricultural fields. There will be no loss of priority habitat. There is a PRoW through the north eastern section of the site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are likely to be obscured by arable field hedgerows and residential areas, however, and taking a precautionary approach and the location of this site, urbanisation impacts upon FLL are possible and therefore screened in. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH12	Residential	1800	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are located within 400m of this allocation and urbanisation LSEs on the designations themselves are likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located adjacent to this allocation. The site is comprised of a number of agricultural fields and is located on the Hoo Peninsula. The surrounding land use comprises agricultural fields and Cookham Wood to its south. There will be no loss of priority habitat. There are a number of PRoW running through the site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are likely and therefore, urbanisation impacts upon FLL are screened in.	x

HHH22	Residential	1500	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 800m to the south and Thames Estuary and Marshes SPA and Ramsar approx. 3.3km to north. The site is comprised of a number of agricultural fields bound in parts with a non-continuous hedgerow and the occasional cluster of trees. A centre for the biking community is located in the centre of the site. This site is bound to the west by the residential development of Hoo. This is likely to be a source of disturbance. To the south, between the site and the Medway Estuary and Marshes SPA and Ramsar designation, lies a sand and gravel quarry which is likely to be a source of disturbance. There are however clear sight lines into adjacent countryside between the site and the estuary in a southerly and south easterly direction where agricultural fields lie between the designated sites and the site. The site is crossed by a number of PROW – running along field boundaries and across fields. These may be a source of disturbance. There would be no loss of priority habitat. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the location and nature of the site, proximity to the Medway Estuary and Marshes SPA and Ramsar, and the habitat requirements of a number of bird species which utilise agricultural land to roost and feed, particularly at times of high tide, this site has the potential to provide suitable FLL. Likely significant urbanisation effects on FLL are screened in. 	X

	HHH24	Residential	85	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 790m to the south and Thames Estuary and Marshes SPA and Ramsar approx. 4.2km to north. The site comprises an agricultural field with a non- continuous hedgerow and trees down the centre of the site in a north to south direction. A farm building is in the centre of the site. This site is bound by agricultural fields with the residential development of Hoo to the west. This is likely to be a source of disturbance. To the south, between the site and the Medway Estuary and Marshes SPA and Ramsar designation, lies a sand and gravel quarry which is likely to be a source of disturbance. There are however clear sight lines into adjacent countryside between the site and the estuary in a southerly and south easterly direction where agricultural fields lie between the designated sites and the site. The site is crossed by a PROW – running down the centre of the site along the row of trees. This may be a source of disturbance. There would be no loss of priority habitat. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes SPA and Ramsar, and the habitat requirements of a number of bird species which utilise agricultural land to roost and feed, particularly at times of high tide, this site has the potential to provide suitable FLL. Likely significant urbanisation effects on FLL are screened in.	X
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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH25	Residential	100	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 600m to the south and Thames Estuary and Marshes SPA and Ramsar approx. 4.3km to north. The site comprises a grassed field with scattered trees. It is bound by a non-continuous hedgerow with mature trees in places. These are likely to limit sight lines. The site is bound by agricultural fields. A PRoW runs up the site's eastern boundary. This may be a source of disturbance. There would be no loss of priority habitat. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site and its relationship within the surrounding landscape of the Hoo Peninsula, it is considered to provide suitable FLL. LSE are possible due to urbanisation effects on FLL. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH26	Residential	700	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites the Thames Estuary and Marshes SPA and Ramsar which is located approx. 1.5km to the north. The Medway Estuary and Marshes SPA and Ramsar sites are located approx. 2.8km to the south. The site lies approx. 380m to the south east of the Northward Hill RSPB Nature Reserve. The site comprises a number of agricultural fields, bound by hedgerows, to the immediate east of High Halstow. The A228 marks the eastern site boundary. Both the A228 and the residential development to the west are likely to be sources of disturbance. Field boundaries are likely to limit bird sight lines. The surrounding land use is agricultural in nature. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There is a PRoW which runs through the site. This PRoW enters from the west, running to the east and then turns in a right angle south, out of the site. There will be no loss of priority habitat. Considering the nature and location of the site and its location in the wider landscape, it is considered to provide suitable FLL. LSE due to urbanisation effects upon FLL are screened in. 	X

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Appendix 4

Site Prefer Code	ed use Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH29 Resid	ential 55	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which is located approx. 2.3km to the north. The Medway Estuary and Marshes SPA and Ramsar sites are located approx. 2.9km to the south. The site lies approx. 1.1km to the south east of the Northward Hill RSPB Nature Reserve. The site comprises a grassed field bound by hedgerows and mature trees and a yard. The A228 runs to the east. High Halstow is located to the west. Both the A228 and the residential development to the west are likely to be sources of disturbance. Field boundaries are likely to limit bird sight lines. The surrounding land use is agricultural in nature. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There is a PRoW which runs in a north / south direction along the western border of the site. There will be no loss of priority habitat. Considering the nature and location of the site and its location in the wider landscape, it is considered to provide suitable FLL. LSE due to urbanisation effects upon FLL are screened in. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
НННЗ	Residential	500	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar - approx. 1.7km to the south and the Thames Estuary and Marshes SPA and Ramsar approx. 3.5km to north. Current land use: Previously developed brown field land with open mosaic habitat. There are no PRoWs the site. Surrounding land use: Residential, deciduous woodland and arable. The site is bound on all sides by either woodland or residential development. Chattenden Woods and Lodge Hill SSSI lies to the north. This is an area of ancient and other long-established semi-natural woodland, scrub, and neutral grassland which supports a number of breeding birds including nightingales (<i>Luscinia megarhynchos</i>). It is considered that there are no sight lines around the site connecting to the European designations. There are no water features. Priority habitat loss: Deciduous woodland. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Bird sight lines towards designated sites are likely to be obscured by arable field hedgerows and residential areas. However, taking a precautionary approach and due to the location of this site on the Hoo Peninsula and within the FLL SSSI IRZ area, urbanisation impacts upon FLL are possible and therefore screened in.	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH32	Residential	3	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened in.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar - approx. 90m to the south. Current land use: greenfield. There are no PRoWs the site. No impact on priority habitats. Surrounding land use: greenfield and quarry site to the immediate north, residential development and woodland to the south. It is considered that there are no sight lines around the site connecting to the European designations. There are no water features on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the size, location, nature of the site and proposed scale of development, it is unlikely that there will be urbanised impacts upon FLL. 	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH33	Residential	330	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 530m to the south and Thames Estuary and Marshes SPA and Ramsar approx. 4.3km to north. The site comprises a number of agricultural fields with hedgerow present in places. This site is bound by agricultural fields. To the immediate south, between the site and the Medway Estuary and Marshes SPA and Ramsar designation, lies a sand and gravel quarry which is likely to be a source of disturbance. There are however clear sight lines into adjacent countryside between the site and the estuary in a southerly direction where agricultural fields lie between the designated sites and the site. The site is crossed by a PRoW. These may be a source of disturbance. There would be no loss of priority habitat. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the location and nature of the site, proximity to the Medway Estuary and Marshes SPA and Ramsar, and the habitat requirements of a number of bird species which utilise agricultural land to roost and feed, particularly at times of high tide, this site has the potential to provide suitable FLL. LSE are possible due to urbanisation effects upon FLL. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH4	Residential	8	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1.6km to the south. The site comprises developed land in a residential area. This site is bound on all sites by residential development. There are no clear sight lines into adjacent countryside between the site and the estuary in a southerly direction. There are no PRoW or priority habitat. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the size, location, nature of the site and proposed scale of development, it is unlikely that there will be urbanised impacts upon FLL.	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH41	Residential	25	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1.3km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 3.4km to north. The site comprises developed industrial units and associated access infrastructure. It is bordered by arable fields to the south, beyond which is the settlement of Hoo, and the A228 to the north. These features present sources of disturbance and likely barriers to bird sight lines. There is a PRoW which runs along the south western site boundary. No priority habitat would be lost. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the size, location, nature of the site and proposed scale of development, it is unlikely that there will be urbanised impacts upon FLL. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH5	Residential	50	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1.4km to the east. This site is located to the north of the River Medway within an area of woodland. It comprises a residential dwelling and garden / scrub. No priority habitat will be lost and there is a PRoW running along the site's western boundary. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the nature of the site, scale of development and its location within woodland which restricts bird sightlines, it is unlikely to provide FLL or result in urbanisation effects upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH6	Residential	450	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1.5km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 3.5km to north. The site comprises a number of agricultural fields area. The fields are bound by hedgerows with the A228 forming the southern site boundary. Residential development and the A228 restrict flight lines to the south. Vegetation, including that in the adjacent former Deangate Ridge Golf Course, restrict flight lines to the north of the site. A PRoW runs along the southwestern site boundary. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There will be no loss of priority habitat. Considering the nature of the site, it is not considered to provide suitable FLL. LSEs upon FLL from urbanisation effects are also considered to be unlikely. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HHH8	Residential	450	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 3.4km to north. The site comprises a number of arable fields bound by hedgerows. The site is sandwiched between the A228 and the settlement of Hoo and Chattenden (including houses and road infrastructure), with Hoo primary school and playing fields to the immediate south east. These features present sources of disturbance and likely barriers to bird sight lines. There are no PRoWs across the site. No priority habitat would be lost. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. LSEs upon FLL from urbanisation effects are also considered to be unlikely. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR14	Residential	68	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 4km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 1.5km to north. The site comprises a number of arable fields bound by hedgerows. The site is located to the immediate south of the residential areas of Cliffe Wood. These features present sources of disturbance and likely barriers to bird sight lines. There are no PRoWs across the site. No priority habitat would be lost. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site and its location, it is not considered to provide suitable FLL. LSEs upon FLL from urbanisation effects are also considered to be unlikely. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR4	Residential	120	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 4.3km to the south and Thames Estuary and Marshes SPA and Ramsar approx. 1.4km to north. The site comprises an arable fields bound by hedgerows. The site is located to the immediate south of the residential areas of Cliffe Wood. These features present sources of disturbance and likely barriers to bird sight lines. There are no PRoWs across the site. No priority habitat would be lost. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site and its location, it is not considered to provide suitable FLL. LSEs upon FLL from urbanisation effects are also considered to be unlikely. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR47	Residential	7	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1.3 km to the east. The site is located on the northern bank of the River Medway and is currently developed as a residential dwelling. The surrounding land use is also residential on all sides. These features present sources of disturbance and likely barriers to bird sight lines. There are no PRoWs across the site. There is some deciduous woodland on site. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site and its location, it is not considered to provide suitable FLL. LSEs upon FLL from urbanisation effects are also considered to be unlikely. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR49	Residential	6	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	 The closest European sites are Medway Estuary and Marshes SPA and Ramsar - approx. 1km to the east. The site is located on the northern bank of the River Medway and is currently developed. The surrounding land use urban on all sides. These features present sources of disturbance and likely barriers to bird sight lines. There are no PRoWs across the site. Mudflat priority habitat is located on the bank of the River Medway. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site and its location, it is not considered to provide suitable FLL. LSEs upon FLL from urbanisation effects are also considered to be unlikely. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR51	Residential	250	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Thames Estuary and Marshes SPA and Ramsar sites are located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened in.	 This site is located adjacent to the Thames Estuary and Marshes SPA and Ramsar sites which lies to its west. The site comprises a number of agricultural fields with hedgerow present in places. This site is bound by agricultural fields with the residential area of Cliffe to the east. There are clear sight lines to the estuary in a westerly direction. The site is crossed by a PRoW. These may be a source of disturbance. There would be no loss of priority habitat. The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the location and nature of the site, proximity to the Medway Estuary and Marshes SPA and Ramsar, and the habitat requirements of a number of bird species which utilise agricultural land to roost and feed, particularly at times of high tide, this site has the potential to provide suitable FLL. LSE are possible due to urbanisation effects upon FLL. 	X

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Site Prefe Code	ferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR7 Res	esidential	45	This site is located within 6km of the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar designated sites. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC and therefore recreational LSEs on this SAC are unlikely.	The Medway and Thames Estuary and Marshes SPA and Ramsar sites are not located within 400m of this allocation and urbanisation LSEs on the designations themselves are therefore screened out.	The closest European sites are the Thames Estuary and Marshes SPA and Ramsar which is located approx. 850m to the north. The Medway Estuary and Marshes SPA and Ramsar sites are located approx. 4.7km to the south. The site comprises a number of agricultural fields to the immediate northwest of the settlement of Cliffe Wood. The adjacent residential area is likely to be a source of disturbance. Hedgerows form site boundaries and present barriers to bird sight lines. The surrounding land use to the north, west and south is agricultural. The fields to the north are bound by hedgerows in some instances (which may further reduce bird sight lines). The site sits within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There is a PRoW which runs through the centre of the site in a northeast / southwest direction. No priority habitat would be lost. Considering the location and nature of the site, proximity to the Thames Estuary and Marshes SPA and Ramsar, and the habitat requirements of a number of bird species which utilise agricultural land to roost and feed, particularly at times of high tide, this site has the potential to provide suitable FLL. LSE are possible due to urbanisation effects upon FLL.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP8	Residential	20	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4.5km to the east of the site.The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations.This site is developed and located within a densely urban setting.Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HW11	Residential	60	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 5.4km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a greenfield and developed area. It is surrounded by agricultural fields with urban development to its northeast. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X
HW5	Assessed above as a mixed use site					

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
HW6	Residential	88	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 5km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a greenfield surrounded by woodland with urban development to its northeast and the M2 to its south. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X
HW8	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4.5km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a greenfield surrounded by residential development. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
LW10	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4.6km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a greenfield and developed land with residential development to the east and agricultural land on other sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X
LW2	Residential	18	This site is located within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the SAC are therefore likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located over 7km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a greenfield with residential development on all sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
LW3	Residential	17	This site is located within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the SAC are therefore likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located over 6.7km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a greenfield with residential development on all sides and woodland to the north. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X
LW4	Residential	350	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 5.3km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises arable fields and woodland. Residential development lies to its west, with woodland and arable fields on all other sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
LW5	Residential	Unknown	This site is located within 7km of the North Downs Woodlands SAC. Recreational LSEs upon the SAC are therefore likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located over 6.5km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This is developed with residential development on all sides and woodland to the north. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	x
LW6	Residential	800	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.4km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises arable fields and woodland. Residential development lies to its west and north, with woodland and arable fields on all other sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
LW7	Residential	450	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 5.7km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises arable fields. Residential development lies to its west and north, with arable fields on all other sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X
LW8	Residential	1649	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4.5km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises arable fields. Arable fields lie on all sides, with residential development beyond this. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RN11	Residential	20	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.4km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a green field and developed land within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X
RN22	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 770m to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises developed land within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RN23	Residential	75	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are likely.	 The Medway Estuary and Marshes SPA and Ramsar is located approx. 360m to the north east. The site is comprised of scrub habitat with woodland and hedgerow or residential development forming the site boundaries. Residential development (of Rainham) forms the northern, eastern and southern boundaries. These areas are likely to be a source of disturbance and limit bird sight lines. The area to the west is grassed fields beyond which is woodland. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There are no PRoWs across the site. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RN25	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are likely.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 360m to the north east. The site is comprised of scrub habitat with residential development in the eastern area of the site. Residential development (of Rainham) forms the northern, eastern and southern boundaries. These areas are likely to be a source of disturbance and limit bird sight lines. The area to the west is grassed fields beyond which is woodland. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There are no PRoWs across the site. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RN27	Residential	200	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are likely.	 The Medway Estuary and Marshes SPA and Ramsar is located approx. 300m to the north east. The site is grassland / scrub with some trees / scattered scrub. It is surrounded by residential development. The Lower Rainham Road runs along its northern boundary. These areas are likely to be a source of disturbance and limit bird sight lines. Beyond this road are agricultural fields. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There is a PRoW running NE/SW along on eastern border of the site. This may be a source of disturbance. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RN28	Residential	66	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is not located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are unlikely.	 The Medway Estuary and Marshes SPA and Ramsar is located approx. 1.3km to the north. The site is grassland / scrub and previously developed. There is a brownfield site to its north, beyond which is a railway line. There is urban development on other sides including the A2 to its immediate south. These areas are likely to be a source of disturbance and limit bird sight lines. There are no PRoWs. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely. 	X
RN29	Residential	14	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is not located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are unlikely.	 The Medway Estuary and Marshes SPA and Ramsar is located approx. 600m to the north. The site is currently developed with urban development to its north, east and west. There are green fields to its south. These areas are likely to be a source of disturbance and limit bird sight lines. There are no PRoWs. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RN30	Residential	80	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is not located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are unlikely.	 The Medway Estuary and Marshes SPA and Ramsar is located approx. 1.1km to the north. The site is an agricultural field surrounded by a hedgerow. There are greenfields to its north and west and a golf course to its east. These areas are likely to be a source of disturbance and limit bird sight lines. There are no PRoWs. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely. 	X
RN31	Residential	60	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is not located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are unlikely.	 The Medway Estuary and Marshes SPA and Ramsar is located approx. 840m to the north. The site is an agricultural field surrounded by a hedgerow. There are greenfields to its north and west and a golf course to its east. These areas are likely to be a source of disturbance and limit bird sight lines. There are no PRoWs. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RN32	Residential	48	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is not located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are unlikely.	 The Medway Estuary and Marshes SPA and Ramsar is located approx. 1.3km to the north. The site is an agricultural field surrounded by a hedgerow, with a railway line marking its northern boundary and the A2 to its immediate south. There is residential development to its west. These areas are likely to be a source of disturbance and limit bird sight lines. There are no PRoWs. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RSE10	Residential	750	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.3km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a number of agricultural fields across three site components. The A2 runs between the northern and middle site block. There is residential development to the north and west of the site and agricultural fields on all other sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RSE8	Residential	10	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 2.2km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises a number of agricultural fields and is surrounded by agricultural fields on all sides. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RSE9	Residential	15	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.7km to the north of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. This comprises an agricultural field surrounded by hedges. There is woodland to the north and west of the site, beyond which is residential development. There is planted woodland to the south and greenfields to the east. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB3	Residential	4	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.5km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is split over two blocks and is developed with a footpath running along the western boundary of the southern block. The surrounding land use is residential. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X
RWB4	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.5km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site an area of hard standing surrounded by trees in a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB6	Residential	7	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.7km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site an area of hard standing surrounded by trees in a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X
SNF12	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is not located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are unlikely.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 4km to the north.The site comprises a greenfield surrounded by trees and hedges in a residential setting.The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations.Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF5	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 4.5km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is currently developed land, areas of green space and trees within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X
SW1	Residential	12	This site is located within 7km of the North Downs Woodland SAC and therefore recreational LSE are screened in. It is not within 6km of the North Kent Estuary and Marshes and therefore Bird Wise does not apply.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 6.8km to the east. The North Downs Woodlands SAC is located approx. 5.2km to the south west. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site and surrounding area are residential in nature. There are no PRoWs across the site. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SW2	Residential	106	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.9km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is currently developed land, areas of green space and trees within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X
SW3	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.8km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is previously developed land, areas of green space and trees within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SW5	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.9km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is previously developed land and hard standing within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	x
SW6	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.5km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is developed land, areas of green space and trees within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SW7	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 5.4km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is currently used as car parking within a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X
T3	Residential	20	This site is located within 6km of the Medway Estuary and Marshes SPA. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs are likely. It is not located within 7km of the North Downs Woodlands SAC.	The site is not located within 400m of the Medway Estuary and Marshes SPA and Ramsar and therefore urbanisation impacts are unlikely.	The Medway Estuary and Marshes SPA and Ramsar is located approx. 1.5km to the north.The site comprises previously developed land and trees in a residential setting.The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations.Considering the nature of the site, it is not considered to provide suitable FLL. In addition, LSE due urbanisation impacts on FLL are unlikely.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
W7	Residential	21	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest estuary European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. over 1.7km to the northeast of the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site is currently developed (building and car park) with an area of greenspace (garden) and trees in a residential setting. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

Appendix 4

Urban (Core –	Residentia	l-led sit	es
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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB1	Residential	35	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.2km to the northeast of the site. This site includes a previously developed parcel of land in Chatham on the southern bank of the River Medway. With the A2 to the south and urban development and transport infrastructure on all other sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB10	Residential	72	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.1km to the northeast of the site. This site comprises a car park in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB11	Residential	30	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises existing development in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X
CCB12	Assessed above as a mixed-use site					

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB13	Residential	212	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x
CCB15	Assessed above as a mixed use site					

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB16	Residential	26	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB17	Residential	14	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises a car park in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB18	Residential	193 (tbc)	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. Urban development and transport infrastructure is located on all sides of this site which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB19	Residential	13	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB20	Residential	175	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB21	Residential	14	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB22	Residential	14	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB23	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB24	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB26	Residential	49	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB27	Residential	20	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB28	Residential	11	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB3	Residential	13	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB30	Residential	21	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB31	Residential	179	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of trees, grass and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB34	Residential	36	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB36	Residential	7	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB37	Residential	200	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB38	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB39	Residential	24	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of trees in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB4	Residential	50	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of previously developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB41	Residential	7	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land, garden and trees in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB44	Residential	2	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of hardstanding in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB46	Residential	2	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of previously developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB49	Residential	150	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB6	Residential	50	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB7	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and trees in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB8	Residential	164	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB9	Residential	32	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land in Chatham on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP1	Residential	111	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.7km to the northeast of the site. This site comprises an area of currently developed land, areas of grass and trees and parking on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is a PRoW running along the site's eastern boundary. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP12	Residential	70	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.4km to the northeast of the site. This site comprises an area of currently developed land on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP16	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.4km to the northeast of the site. This site comprises an existing residential unit and garden on the southern bank of the River Medway. With residential development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP19	Residential	146	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.1km to the northeast of the site. This site comprises an area of currently developed land and parking, over two land parcels, on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP23	Residential	63	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3km to the northeast of the site. This site comprises an area of currently developed land and parking on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP25	Residential	121	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 3.4km to the northeast of the site. This site comprises Chatham Station and associated railway sidings, parking, buildings etc on the southern bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS10	Residential	18	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.5km to the northeast of the site. This site comprises an area of currently developed land in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS13	Residential	12	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.8km to the northeast of the site. This site comprises an area of currently developed land and parking in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS14	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.7km to the northeast of the site. This site comprises an area of currently developed land and parking in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS19	Residential	30	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.5km to the northeast of the site. This site comprises an area of currently developed land in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS26	Residential	14	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.6km to the northeast of the site. This site comprises an area of currently developed land and parking in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS30	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.6km to the northeast of the site. This site comprises an area of currently developed land and parking in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS37	Residential	136	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.1km to the northeast of the site. This site comprises Gillingham railway station and associated railway sidings, parking and buildings. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS4	Residential	24	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.5km to the northeast of the site. This site comprises an area of currently developed land in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS5	Residential	7	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.5km to the northeast of the site. This site comprises an area of currently developed land in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS7	Residential	14	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.8km to the northeast of the site. This site comprises an area of currently developed land in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS8	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 1.5km to the northeast of the site. This site comprises an area of currently developed land and some grass/scrub in Gillingham. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB11	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB14	Residential	15	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB15	Residential	23	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB17	Residential	3	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB18	Residential	4	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB19	Residential	374	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and road infrastructure in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB20	Residential	15	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB21	Residential	15	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB8	Residential	2	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB9	Residential	3	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Rochester on the south bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF10	Residential	16	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF13	Residential	373	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF15	Residential	350	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF17	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF18	Residential	27	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF20	Residential	15	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF21	Residential	44	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF22	Residential	47	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF23	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF24	Residential	7	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land, parking and trees in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF30	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF31	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF34	Residential	52	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land and parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF36	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises some green space in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF37	Residential	13	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of currently developed land, parking, hard standing and trees in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF8	Residential	19	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which are located approx. 4km to the northeast of the site. This site comprises an area of parking in Strood on the north bank of the River Medway. With urban development and transport infrastructure on all sides which are likely to provide a significant source of disturbance. There would be no loss of priority habitat. There is no PRoW on site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF9	Residential	40	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 4.6km to the east of the site. The site comprises an area of developed land within an urban setting to the south of the Chatham main line in Strood centre. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat. There are no PRoWs at the site. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CCB33	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.3km to the east of the site. The site comprises an area of developed land within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat. There are no PRoWs at the site. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

Urban Edge – Residential-led sites

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP10	Residential	140	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 4.1km to the east of the site. The site comprises a school (including buildings, hard standing and playing fields) within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP14	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.2km to the east of the site. The site comprises a developed site within an urban setting on the south bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP17	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.4km to the east of the site. The site comprises a developed site within a residential and retail setting opposite Chatham railway station. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Medway Local Plan HRA Report

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP22	Residential	12	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.6km to the east of the site. The site comprises a developed site within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP6	Residential	120	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.6km to the east of the site. The site comprises a college site within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GN11	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 718m to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GN3	Residential	176	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 586m to the northeast of the site. The site comprises an area of developed land and car parking within an urban setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GN4	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 437m to the northeast of the site. The site comprises an area of developed land within an residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GN5	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 945m to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GN8	Residential	17	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 419m to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS11	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS2	Residential	45	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.8km to the northeast of the site. The site comprises an area of woodland, developed land and hard standing within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS20	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS23	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.3km to the northeast of the site. The site comprises a brownfield site within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS32	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.8km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS33	Residential	12	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.4km to the northeast of the site. The site comprises an area of hard standing and trees within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS35	Residential	12	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.4km to the northeast of the site. The site comprises an area of previously developed land and hard standing within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GS6	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.7km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
L11	Residential	7	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.7km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
L12	Residential	13	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.6km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
L2	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.4km to the northeast of the site. The site comprises an area of trees within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
L3	Residential	7	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3km to the northeast of the site. The site comprises an area of previously developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
L7	Residential	6	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.9km to the northeast of the site. The site comprises an area of previously developed land within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
L9	Residential	22	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.9km to the northeast of the site. The site comprises car dealership within a urban and residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
REWW3	Residential	11	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 4.2km to the northeast of the site. The site comprises an area of developed land within a urban and residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RN18	Residential	8	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.5km to the northeast of the site. The site comprises an area of previously developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RN24	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.3km to the northeast of the site. The site comprises an area of previously developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB12	Residential	3	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 4.1km to the northeast of the site. The site comprises an area of previously developed land and hard standing within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF27	Residential	9	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.9km to the northeast of the site. The site comprises an area of hard standing and greenspace within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF32	Residential	6	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.8km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF38	Residential	12	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.8km to the northeast of the site. The site comprises an area of developed land within an urban setting. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF43	Residential	123	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.1km to the northeast of the site. The site comprises an area of previously developed land within an urban setting, with a residential area to the west and industry to its east. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF44	Residential	6	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.1km to the northeast of the site. The site comprises an area of previously developed land within a residential area. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR25	Residential	181	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.6km to the northeast of the site. The site comprises an area of previously developed land, scrub and trees with an industrial area to the south east and residential areas to the north and west. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X
SR30	Assessed above as a mixed use site					

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SW8	Residential	7	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 4.4km to the northeast of the site. The site comprises an area of developed land within a residential setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
W3	Residential	9	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 2.5km to the northeast of the site. The site comprises an area of hardstanding and parking within an urban setting. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
W4	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.4km to the northeast of the site. The site comprises an area of developed land within an industrial area. Urban development lies between the allocation and the North Kent Estuary and Marshes designations and is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
CHR20	Residential	161	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 5.1km to the northeast of the site. The site comprises an area of developed land within an industrial setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat, however there are areas of coastal and floodplain grazing marsh and mudflats located immediately adjacent to this allocation. This habitat is however separated from the allocation by a road and some woodland/scrub. This allocation is not likely to provide FLL. Given the location of this allocation on the banks of the River Medway and its location next to priority habitat associated with the North Kent Estuary and Marshes designations of the River Medway and its location next to priority habitat associated with the North Kent Estuary and Marshes designations of the River Medway and its location next to priority habitat associated with the North Kent Estuary and Marshes designations urbanisation effects upon areas of FLL are possible. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP11	Assessed above as a mixed use site					
FP18	Residential	40	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.1km to the east of the site. The site comprises an area of developed land and hard standing within a retail setting on the southern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat, however there are areas of mudflat habitat located immediately adjacent to this allocation. The site is not likely to however provide FLL. Given the location of this allocation on the banks of the River Medway and its location next to priority habitat associated with the North Kent Estuary and Marshes designations, urbanisation effects upon areas of FLL are possible. 	x

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP2	Residential	1	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.3km to the east of the site. The site comprises an area of developed land and greenspace within an urban setting on the southern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat, however there are areas of mudflat habitat located immediately adjacent to this allocation. The site is not likely to provide FLL. Given the scale of development at this location (1 unit), urbanisation effects upon areas of FLL are unlikely. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
FP4	Residential	1	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar and also within 7km of the North Downs Woodlands SAC. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites and the SAC are likely.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.6km to the east of the site. The site comprises an area of hard standing within an urban setting surrounded on all sides by existing development. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GN13	Residential	98	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar sites are within 400m of the site (immediately adjacent). Urbanisation effects are therefore likely.	 The Medway Estuary and Marshes SPA and Ramsar sites are located to the immediate north of the site. The site comprises an area of developed land (buildings and car park) within an urban setting to the north of Gads Hill and the north of Gillingham on the southern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site itself is not likely to provide FLL. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat, however there are areas of mudflat and coastal floodplain grazing marsh habitat located immediately adjacent to this allocation. Given the location of this allocation immediately adjacent to the Medway Estuary and Marshes SPA and Ramsar designations, urbanisation effects upon areas of FLL are likely. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GN14	Residential	81	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar sites are within 400m of the site (337m to the east). Urbanisation effects are therefore likely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 337m to the east of the site. The site comprises a car dealership within an urban setting surrounded on all sides by existing development. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location of this allocation within 400m of the Medway Estuary and Marshes SPA and Ramsar designations, urbanisation effects upon areas of FLL are likely. 	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GN15	Residential	445	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar sites are within 400m of the site (99m to the east). Urbanisation effects are therefore likely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 99m to the east of the site. The site comprises currently developed land and Gillingham Marina. Urban development and transport infrastructure to the south is likely to provide a significant source of disturbance. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. However, the site is located immediately adjacent to mudflat habitat which is present to both its east and west Given the location of this allocation within 99m of the Medway Estuary and Marshes SPA and Ramsar designations and presence of mudflat habitat to its immediate east and west, urbanisation effects upon areas of FLL are likely.	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
GN6	Residential	180	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	The Medway Estuary and Marshes SPA and Ramsar sites are within 400m of the site (53m to the east). Urbanisation effects are therefore likely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 53m to the east of the site. The site comprises the Southern Gas site and marina boat parking. Urban development and transport infrastructure to the south is likely to provide a significant source of disturbance. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. The site coincides with an area of mudflat priority habitat. There is also mudflat priority habitat immediately adjacent to the site. Given the location of this allocation within 53m of the Medway Estuary and Marshes SPA and Ramsar designations and presence of mudflat habitat on site, it has the potential to affect FLL directly and also have urbanisation effects upon adjacent areas of FLL. 	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB1	Residential	12	This site is not located within 6km of the North Kent Estuary and Marches designations and therefore Bird Wise will not apply. It is however located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 6.3km to the east of the site. The site comprises an area of previously developed land within an urban setting on the southern bank of the River Medway. Urban development and transport infrastructure locally is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however there is some mudflat and coastal saltmarsh priority habitat to the north of the site, separated by trees. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	x

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB2	Residential	36	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is also located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 5.8km to the east of the site. The site comprises an area of boat storage and buildings at Medway Marina on the southern bank of the River Medway. Urban development and transport infrastructure locally is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however there is some mudflat priority habitat to the north of the site. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
RWB25	Residential	106	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.4km to the northeast of the site. The site comprises an area of previously developed land on the southern bank of the River Medway. Urban development and transport infrastructure locally is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however there is some mudflat priority habitat to the north of the site. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X
SM16	Assessed above as a mixed use site					

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF35	Residential	171	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is also located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.9km to the northeast of the site. The site comprises an area of hard standing on the northern bank of the River Medway. Urban development and transport infrastructure locally is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however there is some mudflat priority habitat to the south west of the site, separated by road infrastructure. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF39	Residential	101	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.8km to the east of the site. The site comprises an area of developed land within an urban setting to the south of the Chatham main line in Strood and on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X

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Appendix 4

Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SNF41	Residential	400	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar which is located approx. 3.9km to the east. The current and surrounding land use is urban, with the site located on the northern bank of the River Medway immediately adjacent to mudflat priority habitat. There is a PRoW running broadly NE/SW through the site. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations.	X
SR31	Assessed above as a mixed use site					

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR34	Residential	5	This site is located within 6km of the Medway Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 3.3km to the east of the site. The site comprises an area of developed land within an urban setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is not located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the location and nature of this site, it is unlikely to provide FLL or have urbanisation potential impacts upon areas of FLL associated with the North Kent Estuary and Marshes designations. 	X
SR36	Assessed above as a mixed use site					
SR37	Assessed above as a mixed use site					

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR38	Assessed above as a mixed use site					
SR40	Assessed above as a mixed use site					
SR48	Residential	8	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	 The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1.2km to the east of the site. The site comprises an area of hardstanding boat storage within an urban setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations, however the site is located adjacent to mudflat priority habitat. Given the proximity of mudflat habitat and the site's location with the FLL SSSI IRZ for the North Kent Estuary and Marshes designations, potential impacts upon areas of FLL are screened in. 	X

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Site Code	Preferred use	Net new homes / proposed employment use	Recreational Pressure	Urbanisation Impacts	Urbanisation effects – functionally linked land associated with the North Kent Estuary and Marshes designations	Coastal Squeeze
SR50	Residential	5	This site is located within 6km of the Medway and Thames Estuary and Marshes SPA and Ramsar. It is therefore located within the North Kent Estuary and Marshes Bird Wise ZoI and recreational LSEs upon these estuary sites are likely. It is not located within 7km of the North Downs Woodlands SAC.	There are no European sites within 400m of the site. Urbanisation effects are therefore unlikely.	The closest European sites are the Medway Estuary and Marshes SPA and Ramsar sites which are located approx. 1km to the east of the site. The site comprises an area of hardstanding within an urban setting on the northern bank of the River Medway. Urban development and transport infrastructure is likely to provide a significant source of disturbance. The site is located within the FLL SSSI IRZ associated with the North Kent Estuary and Marshes designations. There would be no loss of priority habitat associated with the North Kent Estuary and Marshes designations. Given the proximity of the River Medway and the site's location with the FLL SSSI IRZ for the North Kent Estuary and Marshes designations, potential impacts upon areas of FLL are screened in.	X

Appendix D: Baseline air quality information (Source: APIS)

North Downs Woodlands SAC Baseline Air Quality Information

Table D.1: Nitrogen critical load information for North Downs Woodlands SAC qualifying features broad habitat type

Qualifying feature	Critical load class	Critical load (N) kg/ha/yr	Current levels of deposition Kg/ha/yr
Asperulo-Fagetum beech forests	Fagus forest on non-acid and acid soils	10-15	Maximum: 25.9 Minimum: 25.2 Average: 25.5
Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco- Brometalia</i>) (* important orchid sites)	Semi-dry Perennial calcareous grassland (basic meadow steppe)	10-20	Maximum: 15.0 Minimum: 14.1 Average: 14.6
Taxus baccata woods of the British Isles	Temperate mountain Picea forest, Temperate mountain Abies fo	10-15	Maximum: 25.9 Minimum: 25.2 Average: 25.5

Local contributions to Nitrogen deposition (KgN/ha/yr) from sources (UK): North Downs Woodlands SAC

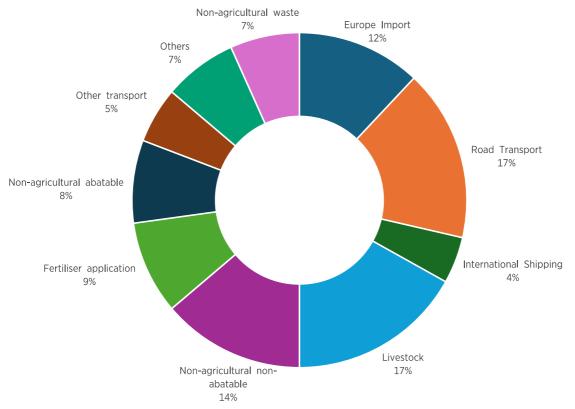


Figure D.1: Pie chart to illustrate local contributions to nitrogen deposition for the North Downs Woodlands SAC

Qualifying feature	Critical load class	Critical load keq/ha/yr	Current levels of deposition Nitrogen / Sulphur
Asperulo-Fagetum beech forests	Unmanaged Broadleafed/Coniferous Woodland	MaxCLminN: 0.14 MaxCLmaxN: 2.08 MaxCLmaxS: 11.03 MinCLminN: 0.14 MinCLmaxN: 1.98 MinCLmaxS: 1.84	Maximum: 1.98 Minimum: 1.89 Average: 1.93
Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)	Calcareous grassland	MaxCLminN: 0.86 MaxCLmaxN: 4.86 MaxCLmaxS: 4 MinCLminN: 0.86 MinCLmaxN: 4.86 MinCLmaxS: 4.0	Maximum: 1.32 Minimum: 1.01 Average: 1.17
Taxus baccata woods of the British Isles	Unmanaged Broadleafed/Coniferous Woodland	MaxCLminN: 0.14 MaxCLmaxN: 2.08 MaxCLmaxS: 11.03 MinCLminN: 0.14 MinCLmaxN: 1.98 MinCLmaxS: 1.84	Maximum: 1.98 Minimum: 1.89 Average: 1.93

Table D.2: Acidity critical load information for the North Downs Woodlands SAC

North Kent Marshes and Estuary SPA designations Baseline Air Quality Information

Table D.3: Nitrogen critical load information for North Kent Marshes and Estuary SPA designations

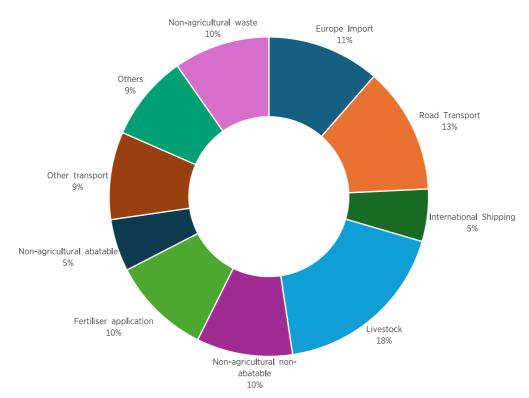
Nitrogen critical load class	Critical load (N) kg/ha/yr	Present in Special Protection Area (SPA)
Atlantic upper-mid and mid-low salt marshes	10-20	Medway Estuary and MarshesThames Estuary and MarshesSwale Estuary and Marshes
Northern wet heath: Callunadominated wet heath (upland)	5-15	Medway Estuary and MarshesThames Estuary and Marshes
Rich fens	15-25	Medway Estuary and MarshesThames Estuary and Marshes
Dry heaths	5-15	Medway Estuary and Marshes
Low and medium altitude hay meadows	10-20	Medway Estuary and MarshesSwale Estuary and Marshes
Shifting coastal dunes	10-20	Medway Estuary and Marshes
Coastal dune grasslands (grey dunes) – calcareous type	10-15	Medway Estuary and Marshes
Coastal dune grasslands (grey dunes) – acid type	5-10	Medway Estuary and Marshes

Acidity Critical Load Class	Critical load (N) kg/ha/yr	Present in Special Protection Area (SPA)
Freshwater	No critical load available	Medway Estuary and MarshesSwale Estuary and Marshes
Dwarf Shrub Heath	MaxCLminN: 0.89 MaxCLmaxN: 4.89 MaxCLmaxS: 4.18 MinCLminN: 0.50 MinCLmaxN: 1.39 MinCLmaxS: 0.89	Medway Estuary and MarshesThames Estuary and Marshes
Calcareous grassland (using base cation)	MaxCLminN: 1.07 MaxCLmaxN: 5.07 MaxCLmaxS: 4.0 MinCLminN: 0.86 MinCLmaxN: 4.86 MinCLmaxS: 4.0	Medway Estuary and MarshesSwale Estuary and Marshes

Table D.4: Acidity critical load information for North Kent Marshes and Estuary SPA designations

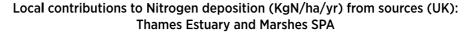
European site	Current levels of deposition Kg/ha/yr	Current levels of deposition Nitrogen / Sulphur (keq/ha/yr):
	Forest:	Forest:
	Maximum: 24.6	Maximum: 1.87
	Minimum: 21.46	Minimum: 1.6
	Average: 22.64	Average: 1.7
	Grid average:	Grid average:
Medway Estuary and Marshes SPA	Maximum: 10.85	Maximum: 0.82
Marshes SFA	Minimum: 7.11	Minimum: 0.56
	Average: 9.17	Average: 0.72
	Moorland (short vegetation):	Moorland (short vegetation):
	Maximum: 13.65	Maximum: 1.06
	Minimum: 11.57	Minimum: 0.88
	Average: 12.39	Average: 0.94
	_	_
	Forest:	Forest:
	Maximum: 24.56	Maximum: 1.9
	Minimum: 20.77	Minimum: 1.56
	Average: 22.56	Average: 1.7
	Grid average:	Grid average:
Thames Estuary and	Maximum: 9.38	Maximum: 0.76
Marshes SPA	Minimum: 6.7	Minimum: 0.54
	Average: 8.13	Average: 0.65
	Moorland (short vegetation):	Moorland (short vegetation):
	Maximum: 13.52	Maximum: 1.05
	Minimum: 11.16	Minimum: 0.85
	Average: 12.24	Average: 0.94
	Forest:	Forest:
	Maximum: 23.56	Maximum: 1.71
	Minimum: 20.94	Minimum: 1.53
	Average: 22.07	Average: 1.62
	-	
	Grid average: Maximum: 9.57	Grid average: Maximum: 0.71
Swale SPA	Maximum: 9.57 Minimum: 6.23	Maximum: 0.71 Minimum: 0.47
	Average: 7.51	Average: 0.57
		-
	Moorland (short vegetation):	Moorland (short vegetation):
	Maximum: 13.06	Maximum: 0.95
	Minimum: 12.04	Minimum: 0.83
	Average: 11.35	Average: 0.89

Table D.5: Current levels of deposition for North Kent Marshes and Estuary SPA designations



Local contributions to Nitrogen deposition (KgN/ha/yr) from sources (UK): Medway Estuary and Marshes SPA

Figure D.2: Pie chart to illustrate local contributions to nitrogen deposition for the Medway Estuary and Marshes SPA



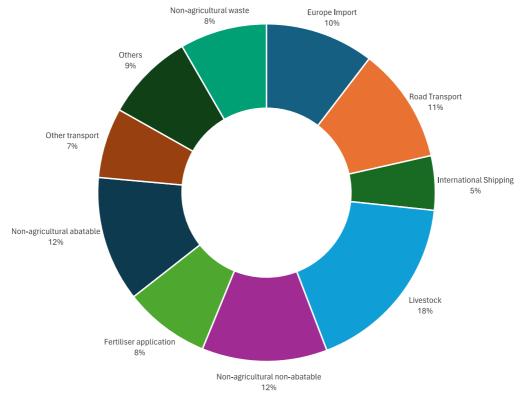
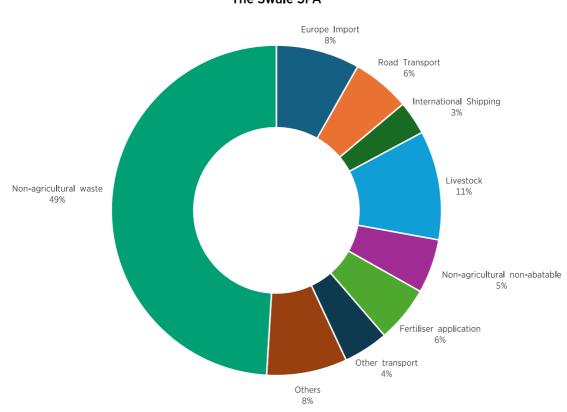


Figure D.3: Pie chart to illustrate local contributions to nitrogen deposition for the Medway Estuary and Marshes SPA



Local contributions to Nitrogen deposition (KgN/ha/yr) from sources (UK): The Swale SPA

Figure D.4: Pie chart to illustrate local contributions to nitrogen deposition for The Swale SPA

Appendix E: Review of indicative preferred sites for recreational and urbanisation impacts

Table E.1: *IRZ SSSI thresholds for residential development located in close proximity to the North Kent Estuary and Marshes designations.*

Indicative preferred site code	Number of residential units	SSSI IRZ thresholds in relation to residential development ¹
Urban Waterfront		
SM16	3000	All applications
GN6	180	All applications
SR48	8	Residential units of 50 or more Rural residential units of 10 or more
SR50	5	All applications
GN13	98	All applications
GN15	445	All applications
GN14	81	Residential units of 50 or more Rural residential units of 10 or more
Urban Edge		
GN8	17	Residential units of 50 or more (Rural residential units of 10 or more)
GN4	8	Residential units of 50 or more (Rural residential units of 10 or more)
GN3	176	Residential units of 50 or more Rural residential units of 10 or more
Suburban		
RN23	75	Residential units of 50 or more Rural residential units of 10 or more
RN27	200	Residential units of 10 or more Rural residential units of 10 or more
RN25	5	Residential units of 50 or more Rural residential units of 10 or more

¹ The most conservative advice has been stated where a site crosses a number of SSSI IRZ bands.

Rural Settlements		
AS2	4	Residential units of 10 or more Rural residential units of 10 or more
AS18	35	Residential units of 10 or more Rural residential units of 10 or more
AS15	9	Residential units of 10 or more Rural residential units of 10 or more
HHH32	3	All applications
AS23	0	[holiday park]
HHH26	700	Residential units of 10 or more Rural residential units of 10 or more
HHH12	1800	All applications
HHH25	100	Residential units of 10 or more Rural residential units of 10 or more
HHH24	85	Residential units of 10 or more Rural residential units of 10 or more
HHH29	55	Residential units of 10 or more Rural residential units of 10 or more
AS25	15	Residential units of 10 or more Rural residential units of 10 or more
AS6	40	Residential units of 10 or more Rural residential units of 10 or more
AS14	60	Residential units of 10 or more Rural residential units of 10 or more
AS17	100	Residential units of 10 or more Any rural residential
SR7	45	(Residential units of 50 or more) Rural residential units of 10 or more
ННН33	330	Residential units of 10 or more Rural residential units of 10 or more

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ННН5	50	Residential units of 10 or more Rural residential units of 10 or more
AS28	9	All applications
AS21	75	Residential units of 10 or more Rural residential units of 10 or more
AS11	10	Residential units of 10 or more Rural residential units of 10 or more
AS16	25	Residential units of 10 or more Rural residential units of 10 or more
HHH8	450	Residential units of 50 or more Rural residential units of 10 or more
AS22	100	All applications
HHH22	1500	Residential units of 10 or more Rural residential units of 10 or more
SR49	6	Residential units of 50 or more Rural residential units of 10 or more
SR47	7	Residential units of 50 or more Rural residential units of 10 or more
AS10	5	Residential units of 10 or more Rural residential units of 10 or more
SR51	250	All applications
AS29	7	Residential units of 10 or more Rural residential units of 10 or more

Table E.2: *MLP indicative preferred sites which are located within 400m of a European site or with the potential to have urbanisation effects on possible functionally linked land*

Indicative preferred site code	Number of Residential Units / Proposed Land Use	European site within 400m or potential for urbanisation impacts on functionally linked land
AS24	Employment	Medway Estuary and Marshes SPA and Ramsar Thames Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS26	Employment	Medway Estuary and Marshes SPA and Ramsar Thames Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
HHH35	Employment	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
ННН36	Employment	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
HHH37	Employment	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
ННН38	Employment	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
ННН39	Employment	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
SM16	Employment 3000 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes SPA and Ramsar
AS10	5 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS11	10 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS14	60 Residential Units	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS15	9 Residential Units	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar

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Indicative preferred site code	Number of Residential Units / Proposed Land Use	European site within 400m or potential for urbanisation impacts on functionally linked land
AS16	25 Residential Units	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS17	100 Residential Units	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS18	35 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS2	4 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS21	75 Residential Units	Thames Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS22	100 Residential Units	Thames Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS23	Holiday park	Thames Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS25	15 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS28	9 Residential Units	Medway Estuary and Marshes SPA and Ramsar Thames Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS29	7 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
AS6	40 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
CHR14	49 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
HHH11	200 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
HHH12	1800 Residential Units	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar

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Indicative preferred site code	Number of Residential Units / Proposed Land Use	European site within 400m or potential for urbanisation impacts on functionally linked land
HHH22	1500 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
HHH24	85 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
HHH25	100 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
HHH26	700 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
HHH29	55 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
ННН3	500 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
HHH32	3 Residential Units	Medway Estuary and Marshes SPA and Ramsar Thames Estuary and Marshes SPA and Ramsar
ННН33	330 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
SR51	250 Residential Units	Thames Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes and Thames Estuary and Marshes SPA and Ramsar
SR7	45 Residential Units	Functionally Linked Land associated with the Thames Estuary and Marshes SPA and Ramsar
RN23	75 Residential Units	Medway Estuary and Marshes SPA and Ramsar
CHR20	161 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes SPA and Ramsar
FP18	40 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes SPA and Ramsar
GN13	98 Residential Unit	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes SPA and Ramsar
GN14	81 Residential Units	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes SPA and Ramsar
GN15	445 Residential Units	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes SPA and Ramsar

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Indicative preferred site code	Number of Residential Units / Proposed Land Use	European site within 400m or potential for urbanisation impacts on functionally linked land
GN6	180 Residential Units	Medway Estuary and Marshes SPA and Ramsar Functionally Linked Land associated with the Medway Estuary and Marshes SPA and Ramsar
SR48	8 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes SPA and Ramsar
SR50	5 Residential Units	Functionally Linked Land associated with the Medway Estuary and Marshes SPA and Ramsar

Appendix F: Bird habitat requirements





Species: Brent Goose - Branta bernicla bernicla

Around 135 thousand individuals migrate through the British Marshes and Estuaries in the winter feeding mainly on vegetation. The Medway Estuary and Marshes SPA holds up to 3205 individuals. In winter, Brent Geese feed largely on eelgrass and Enteromorpha (green algae) species but as numbers have increased they have begun to make more extensive use of improved grassland and winter cereals for foraging inland.

> Qualifying Feature* for: - Medway Estuary and Marshes SPA and Ramsar -The Swale SPA and Ramsar



Species: Shelduck - Tadorna tadorna

The Common Shelduck has a diet consisting of invertebrates, shellfish and aquatic snails and resides in coastal areas and large inland waterbodies.

Considerable numbers of Shelducks breed in and around the Medway Estuary and Marshes SPA. This species has a clear preference for estuarine habitats in winter with peak recordings of 10,000 on the Thames Estuary and Marshes Ramsar in 1963.

> Qualifying Feature for: - Medway Estuary and Marshes SPA and Ramsar



Species: Dunlin - Calidris alpina alpine

Dunlin gather in winter flocks around the coast and large waterbodies, feeding on insects, worms and snails. They roost on the shore at low tide, or in adjacent fields and saltmarshes. Dunlins are small with a slightly curved down, short bill. The Thames site held the second highest WeBS number of wintering Dunlins in the UK with counts averaging 37,250.

> Qualifying Feature* for: -Medway Estuary and Marshes SPA and Ramsar -Thames Esturary and Marshes SPA and Ramsar -The Swale SPA



Species: Common Redshank - Tringa totanus

Common Redshank feed on crustaceans and insects using their bill to sift through the soil.

High population counts on the Medway Estuary and Marshes SPA and Ramsar include 3,000 (September 1962) and 3,750 (October 1975) with mean counts for this site usually around 1,237.

Qualifying Feature for: -Medway Estuary and Marshes SPA and Ramsar -Thames Esturary and Marshes SPA and Ramsar -The Swale SPA and Ramsar



Species: Pied Avocet - Recurvirostra avosetta

This species has an upturned bill. This feature allows the Avocet to place its beak just below the surface of the water and sweep in an arc whilst walking forward in order to catch vegetation and small invertebrates.

This species also has webbed toes allowing it to swim in large flocks. 284 pairs were recorded to be breeding in Kent in 2006.

Qualifying Feature for: -Medway Estuary and Marshes SPA and Ramsar -Thames Esturary and Marshes SPA and Ramsar



Species: Wigeon - Anas penelope

Predominantly a grazing duck whose diet consists of pastures associated with water. This makes the population vulnerable to changes in agriculture, drainage and pollution. A winter visitor to The Swale with numbers reaching 20,000. In times of flood these birds move to inland marshy areas locally feeding on eel-grass and algae.

> Qualifying Feature for: - The Swale SPA and Ramsar



Species: Red Knot - Calidris canutus

The Red Knot is a very sociable bird which feeds along shoreline on insects and vegetation during the summer and invertebrates, especially molluscs, in the winter. Both the male and female have a white speckled breast and are grey on top. These birds migrate to the UK from the Arctic over winter expanding

the UK population to around 320,000.

Qualifying Feature for: -Medway Estuary and Marshes SPA and Ramsar -Thames Esturary and Marshes SPA and Ramsar



Species: Pintail - Anas acuta

Associated with marshland and coastal regions, feeding at the surface of the water mainly on vegetation, though their diet increases in insects whilst breeding. The Pintail is attracted to natural floodplains when they are covered by shallow sheets of water. This brings in a variety of food for the Pintail.

Qualifying Feature for: -Medway Estuary and Marshes SPA and Ramsar -Thames Esturary and Marshes SPA and Ramsar - The Swale SPA and Ramsar



Species: Shoveler - Anas clypeata

The Shoveler feeds in shallow marshes, utilising their large beak to forage for invertebrates and seeds from the ground. They also skim the water surface for algea. This species is a winter visitor with a small number also recorded in summer. In 2001/02 there was a peak in population for this species reaching 587 individulas in The Swale Ramsar.

> Qualifying Feature for: -The Swale SPA and Ramsar



Species: Little Tern - Sterna albifrons

Unlike other coastal bird species, the Little Tern does not fly long distances to find food. They fish close to the shoreline. These birds are therefore susceptible to disturbance caused by beach use and public access.

These birds nest exclusively on beaches near the high tide line. This means unusually high tides and beach disturbance can be disastrous for the population of this species.

> Qualifying Feature for: -Medway Estuary and Marshes SPA and Ramsar



Species: Black Tailed Godwit - Limosa limosa

This large, long-legged wader has a straight bill and an orange face and underparts in the summer and plain grey in the winter. The Godwit species has a distinctive black tail in both summer and winter. These birds migrate to the UK in the winter months spending their time using their stright long bills looking for worms and other invertebrates in marshes and estuaries.

> Qualifying Feature for: -Thames Esturary and Marshes SPA and Ramsar -The Swale SPA and Ramsar



Species: Grey Plover - Pluvialis squatarola

Grey Plover is a winter migrant, inhabiting solely coastal areas, with a preference for mud or sand shoreline. It feeds on crustaceans and invertebrates and is rarely seen far from the coast. This species is a winter visitor with some passage migrants.

> Qualifying Feature for: -Medway Estuary and Marshes SPA and Ramsar -Thames Esturary and Marshes SPA and Ramsar -The Swale SPA and Ramsar



Species: Hen Harrier - Circus cyaneus

The Hen Harrier migrates to the UK in the winter feeding mostly on small birds, nestlings and small rodents. This species can be found nesting in marshes and is currently on the UK red list with only around 540 pairs recorded in the summer of 2006. The Thames Estuary and Mashes SPA winters 7 individuals and 23 winter on The Swale.

> Qualifying Feature for: -Thames Esturary and Marshes SPA and Ramsar



Species: Ringed Plover - Charadrius hiaticula

The Ringed Plover is a breeding and winter migrant residing on beaches, coastlines and inland. This species is a wader which feeds on invertebrates, molluscs and crustaceans. It is mainly a passage migrant to the UK and is one of the more numerous of the smaller waders in the Medway area, often occurring in small flocks in May en-route to its breeding grounds in the high Arctic.

> Qualifying Feature for: -Medway Estuary and Marshes SPA and Ramsar -Thames Esturary and Marshes SPA and Ramsar -The Swale SPA and Ramsar



Species: Bewick Swan - Cygnus columbianus bewickii

Originating from North East Europe, the Bewick's Swan roosts on open water. Foraging on left over potatoes, grain, aquatic plants and grass. Overwintering on the Medway Estuary and Marshes SPA and Ramsar, feeding in the surrounding fields and farmland.

> Part of the Waterbird Assemblage* for: -Medway Estuary and Marshes SPA and Ramsar



Species: Greater White Fronted Goose - Anser albifrons albifrons

Feeds on winter grassland and agricultural land such as barley, oat, corn and wheat, and on plants in tidal mudflats and wetlands whilst migrating in warmer months. Numbers in the UK have reduced since 1995 due to climate change with Arctic migrators stopping on mainland Europe instead. Populations have fallen from 150 birds to below 50 in 2002/03. This could be due to changes in agriculture and the effects of population.

Part of the Waterbird Assemblage for: -Thames Estuary and Marshes SPA and Ramsar

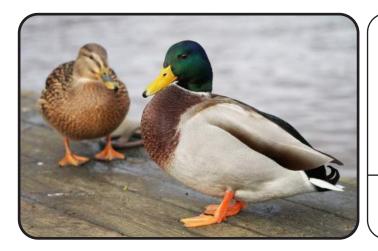


Species: Teal - Anas crecca

Feeding on seeds and invertebrates the Teal inhabits northern moors and mires whilst breeding, found in low-land wetlands in winter. Tend to skulk in thick vegetation.

This species is sensitive to cold weather and water levels, preferring mild winters. These birds move between sites finding stable and favourable conditions. The Thames, Medway and Swale sites allow this movement with ease.

Part of the Waterbird Assemblage for: -Medway Estuary and Marshes SPA and Ramsar - The Swale SPA and Ramsar



Species: Mallard - Anas platyrhynchos

Common in natural and artificial waterbodies across the UK. Numbers are higher in autumn through winter, a reflection of the need to congregate where food is consistent and relatively safe from predators. Feeds on a mix of vegetation, insects and shellfish.

Part of the Waterbird and Breeding Bird Assemblages* for: -Medway Estuary and Marshes SPA and Ramsar



Species: Pochard - Aythya ferina

Common Pochard feed on vegetation, small fish, insects and molluscs. They are found on large water bodies, estuaries and gravel pits. The Pochard is a winter visitor to the UK with a small number breeding on the Medway Estuary and Marshes SPA and Ramsar and is currently holds red status on the UK Conservation list as this species is vulnerable to decline.

Part of the Waterbird and Breeding Bird Assemblages for: -Medway Estuary and Marshes SPA and Ramsar



Species: Lapwing - Vanellus vanellus

Lapwing feed on agricultural land such as cereals and root crops, and on plants and invertebrates. Lapwing continue to breed in the SPA and immediately surrounding area. The Thames and the Swale have both supported wintering numbers of national significance in recent years with mean peaks of 16,863 (2004/05) and 16,129 (2008/09).

Part of the Waterbird and Breeding Bird Assemblagea for: -Medway Estuary and Marshes SPA and Ramsar -Thames Estuary and Marshes SPA and Ramsar -The Swale SPA and Ramsar



Appendix 4 Species: Whimbrel - Numenius phaeopus

Whimbrel contribute to the Medway and Thames Waterbird Assemblage but breed solely in Scotland. They forage for invertebrates, crustaceans and molluscs using inland pools and waters along the Hoo as further stopover and rest sites on spring migration but are extremely unusual in winter.

> Part of the Waterbird Assemblage for: -Medway Estuary and Marshes SPA and Ramsar -Thames Estuary and Marshes SPA and Ramsar



Species: Curlew - Numenius arquata

Curlew winter along the coast or in estuaries and spend the summer on moors, feeding on shellfish and worms found in the ground. The Curlew have been in steady decline since the early 2000's with a mean high count on the Thames exceeding 4,500 from 2004-2009.

Part of the Waterbird and Breeding Bird Assemblages for: -Medway Estuary and Marshes SPA and Ramsar -Thames Estuary and Marshes SPA -The Swale SPA and Ramsar



Species: Red-throated Diver Gavia stellata

The Red-throated Diver is winter visitor to the South of England feeding on primarily fish and large invertebrates. Around 1250 pairs were recorded in the Summer 2004. These birds prefer shallow ponds and lakes but are also found in Kent's Estuaries and Marshes.

Part of the Waterbird and Breeding Bird Assemblages for: -Medway Estuary and Marshes SPA and Ramsar -Thames Estuary and Marshes SPA -The Swale SPA and Ramsar



Species: Great-crested Gebe Podiceps cristatus

The Great-crested Gebe is part of the wintering assemblage and is currently flagged for a high alert on the Medway Estuary and Mashes SPA. The most important wintering sites for this species are either large tidal basins or freshwater lakes or reservoirs.

> Part of the Waterbird Assemblage for: -Medway Estuary and Marshes SPA and Ramsar



Appendix 4 Species: Little Grebe *Tachybaptus ruficollis*

The Thames Estuary has consistently been a top site of national importance during the last 15 years. The Little Grebe population has fluctuated between 150 to 500 birds within these 15 years. These birds live in marshes, ponds and lakes with a diet consisting of mostly insects, molluscs and small fish. This species is susceptible to hard winter weather and the use of agricultural drainage.

Part of the Waterbird Assemblage for: -Medway Estuary and Marshes SPA and Ramsar -Thames Estuary and Marshes SPA and Ramsar -The Swale SPA and Ramsar



Species: Cormorant Phalacrocorax carbo

In 2003/04 305 individuals were recorded on the Medway Estuary and Marshes SPA. Cormorants move freely within and between estuarine areas and the sea depending on tides and food availability. This can make number hard to record. However, once a Cormorant has chosen its wintering site it will return year after year. Fishing and fishing nets are the most dangerous threats the Cormorant is faced with.

> Part of the Waterbird Assemblage for: -Medway Estuary and Marshes SPA and Ramsar -The Swale SPA and Ramsar



Species: Marsh Harrier Circus aeruginosus

In 2005 352 nesting female Marsh Harrier were located across the UK. Kent held 41 of these successful nests, rearing 99 young. Generally, Marsh Harriers nest in large reedbeds but have also been found to nest in ditches, smaller reedbeds and creeks due to an increasing population.

Marsh Harriers are very vulnerable to disturbance and try to nest away from human settlements.

Part of the Breeding Bird Assemblage for: -The Swale SPA and Ramsar



Species: Merlin Falco columbarius

The Merlin is a migrant winter breeder with 1150 pairs recorded in the UK in 2009. These birds can be found nesting in moors, healths or forests. The Merlin's prey consists of small birds and currently hold a red conservation status due to population decline.

> Part of the Breeding Bird Assemblage for: -Medway Estuary and Marshes SPA and Ramsar



Appendix 4 Species: Mediterranean Gull *Larus melanocephalus*

This species was first recorded breeding in the UK in 1968 and has since grown in population to 225 pairs located in 2005. The main threat to Mediterranean gulls comes from high tides as these birds nest on high salt marshes or low islands. Another threat to the Mediterranean gull is people collecting their eggs either legally or illegally for human consumption.

> Part of the Breeding Bird Assemblage for: -The Swale SPA and Ramsar



Species: Common Tern Sterna hirundo

The Common Tern can be found along sandy seacoasts during the warmer months and estuaries and marshes in the winter months feeding on mostly fish along with crustaceans. 11 thousand pairs were recorded in the UK in 2015, however, this species is on the amber conservation list due to a recent breeding population decline.

Part of the Breeding Bird Assemblage for: -Medway Estuary and Marshes SPA and Ramsar



Species: Turnstone Arenaria interpres

The Turnstone is on the Amber list for Birds of Conservation. These birds can be found on estuaries, sandy beaches and particularly rocky shores with plenty of seaweed all year round. The Turnstone feeds mainly on insects and other invertebrates.

> Part of the Waterbird Assemblage for: -Medway Estuary and Marshes SPA and Ramsar



Species: Oystercatcher Haematopus ostralegus

In the winter of 2008/09 an incomplete count of 4,160 was recorded on the Medway SPA alone which was particularly high for this species. Since then the species has steadily declined in population, however, nationally there has been little change in population. Oystercatchers are vulnerable to localised disturbances.

Part of the Waterbird and Breeding Bird Assemblages for: -Medway Estuary and Marshes SPA and Ramsar



Appendix 4 Species: Golden Plover *Pluvialis apricaria*

The Golden Plover roosts on intertidal habitats and feeds in the nearby arable or short grassland. Kent holds 10% of the English wintering population with The Swale holding a maximum of 17,327 in the winter of 2007/08.

The Golden Plover feeds on beetles, earthworms and other invertebrates, usually feeding at night.

Part of the Waterbird Assemblage for: -The Swale SPA and Ramsar



Species: Greenshank Tringa nebularia

The Greenshank is a winter visitor to the Medway Estuary and Marshes SPA with 1100 pairs located across the UK. These birds can be found in marshes, moors, wet grasslands and mudflats. These birds feed on invertebrates and small fish and are currently on the Amber Conservation watchlist.

> Part of the Waterbird Assemblage for: -Medway Estuary and Marshes SPA and Ramsar



Species: Kingfisher Alcedo atthis

The Kingfisher is a resident breeder within the Medway Estuary and Marshes SPA feeding on mostly freshwater fish, aquatic invertebrates hunting from perches or hovering before diving into the water. These birds prefer to nest along rivers, marshes, lakes and seacoasts.

Part of the Waterbird and Breeding Bird Assemblages for: -Medway Estuary and Marshes SPA and Ramsar



Species: Short-eared Owl Asio flammeus

In Kent, the Short-eared Owl as an autumn and winter visitor which occasionally stays on to breed after a winter invasion. It did not breed from 1979 to 1988, but then resumed with two or three pairs on the Isle of Sheppey in most years until 2002. Since then, Clements et al (2015) were only able to report on one further record of confirmed breeding, in 2011. These owls feed on small mammals hunting in both the day and night. Short-Eared Owls can be found in marsh, moor and grasslands.

Part of the Waterbird and Breeding Bird Assemblages for: -Medway Estuary and Marshes SPA and Ramsar



Appendix 4 Species: Reed Warbler Acrocephalus scirpaceus

The Reed Warbler can be found nesting in reedbeds and scrub and are part of the Breeding Assemblage within The Swale. 130 thousand pairs were recorded in the summer of 2009. The Reed Warbler feeds on insects including spiders and snails.

> Part of the Breeding Bird Assemblage for: -The Swale SPA and Ramsar



Species: Reed Bunting Emberiza schoeniclus

The Reed Bunting is a winter visitor and resident breeder at The Swale SPA with 275 thousand territories located in the summer of 2009. The Reed Bunting can be found nesting and feeding in reedbeds and ravine scrub feeding on seeds and invertebrates.

> Part of the Breeding Bird Assemblage for: -The Swale SPA and Ramsar



Species: Coot Fulica atra

The Coot is a winter visitor and resident breeder at The Swale SPA. 26 thousand pairs were recorded in the summer of 2009 nesting in lakes, marshes, rivers and seacoasts feeding on mostly aquatic plants.

The Coot is known for being aggressive to both other species but also their own kind. They have been known to kill their own young if they have too many to feed successfully.

> Part of the Breeding Bird Assemblage for: -The Swale SPA and Ramsar



Species: Moorhen Gallinula chloropus

The Moorhen is an omnivore feeding whilst swimming or walking on floating vegetation or land. This species can be found nesting in marshes, lakes and reedbeds.

The Moorhen is part of the Breeding Assemblage in The Swale SPA with 210 thousand territories located in 2009.

Part of the Breeding Bird Assemblage for: -The Swale SPA and Ramsar





Species: Gadwall Anas strepera

The Gadwall is part of the wintering assemblage of over 20,00 waterfowl on the Thames Estuary and Marshes SPA and The Swale SPA. Numbers of this species have increased over the past 40 years in the UK with numbers on the Thames SPA ranging from 400-500 1998/99 to the peak of 815 in 2002/03. Gadwall are vegetarians feeding largely on aquatic plants.

Part of the Waterbird and Breeding Bird Assemblages for: -Thames Estuary and Mashes SPA and Ramsar -The Swale SPA and Ramsar



Species: Redshank *Tringa totanus*

The Redshank can be found on all three SPAs with numbers reaching a maximum of 3,750 on the Medway and Marshes SPA in 1975 averaging at around 1,237 at this same location. Redshanks usually stay within a 4km radius of their site as they are typically faithful to their sites even over the winter months.

Part of the Waterbird and Breeding Bird Assemblages for: -Medway Estuary and Marshes SPA and Ramsar -Thames Estuary and Mashes SPA and Ramsar -The Swale SPA and Ramsar

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Natural England (2011) What do we know about the birds and habitats of the North Kent Marshes?: Baseline data collection and analysis (NECR082) Available at: http:// publications.naturalengland.org.uk/publication/40020 [Date accessed: 15/05/2024] Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys

Biodiversity Net Gain



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Appendix 5 Diversity impact assessment

TITLE Medway Local Plan Regulation 18 consultation

DATE 9 May 2024

LEAD OFFICER. Catherine Smith, Head of Planning Policy, RCE

1. Summary description of the proposed change

What is the change to policy / service / new project that is being proposed? How does it compare with the current situation?

This is a consultation as an interim stage to the preparation of a new Local Plan, that sets planning policy for Medway.

The consultation document seeks views on options for locations and sites for development allocations up to 2041, and proposed policies for managing Medway's growth.

The current Local Plan was adopted in 2003 and needs to be updated to plan for sustainable development in Medway up to 2041.

2. Summary of evidence used to support this assessment

Eg: Feedback from consultation, performance information, service user. Eg: Comparison of service user profile with Medway Community Profile The Local Plan draws information from a range of published data sources, and council and wider strategies and reports to identify the characteristics of Medway. This is used to identify issue and needs and set out a policy response, eg types of housing or services needed as Medway's population grows and changes.



3. What is the likely impact of the proposed change?

Is it likely to:

Adversely impact on one or more of the protected characteristic groups Advance equality of opportunity for one or more of the protected characteristic groups

Foster good relations between people who share a protected characteristic and those who don't

(insert Yes when there is an impact or No when there isn't)

This is consultation seeks input to planning for sustainable development in Medway. The consultation and engagement strategy seeks to reach a range of communities across Medway, including those are under-represented in planning consultations.

The Local Plan will seek to advance equality of opportunity, but this will be more meaningfully addressed at the draft plan stage that will follow this consultation.

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	No	-	-
Disabilty	No	-	-
Gender reassignment	No	-	-
Marriage/civil partnership	No	-	-
Pregnancy/maternity	No	-	-
Race	No	-	-
Religion/belief	No	-	-
Sex	No	-	-
Sexual orientation	No	-	-
Other (eg low income groups)	No	-	-

4. Summary of the likely impacts

Who will be affected?

How will they be affected?

The consultation will be open for all residents in Medway. There are limited impacts on different community sectors at this stage. The vision and strategic objectives include provision of a range of housing types, promoting health and well-being, and access to local services and greenspaces.

5. What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?



Diversity impact assessment

What alternative ways can the Council provide the service? Are there alternative providers? Can demand for services be managed differently? N/A

6. Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Produce DIA for Pre-Submission Draft Local Plan reviewing potential impacts of policies and site allocations in 2025.	Planning Service	January 2025

7. Recommendation

The recommendation by the lead officer should be stated below. This may be: to proceed with the change, implementing the Action Plan if appropriate, consider alternatives, gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why. Produce DIA for Draft Local Plan reviewing potential impacts of policies and site allocations in 2025.

8. Authorisation

The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Mark Breathwick

Date of authorisation

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Appendix 6 Diversity impact assessment

TITLE UPDATE TO STATEMENT OF COMMUNITY INVOLVEMENT

DATE 9 May 2024

LEAD OFFICER. Catherine Smith, Head of Planning Policy, RCE

1. Summary description of the proposed change

What is the change to policy / service / new project that is being proposed? How does it compare with the current situation?

The current Statement of Community Involvement was updated in 2022 to amend previous references to Covid and reflect updated procedures within the Planning Service. It is being further updated to provide greater clarity and to reflect updated procedures within the Planning Service in relation to consultation on planning matters.

2. Summary of evidence used to support this assessment

Eg: Feedback from consultation, performance information, service user. Eg: Comparison of service user profile with Medway Community Profile

Review of consultation procedures in the Planning Service

3. What is the likely impact of the proposed change?

Is it likely to:

Adversely impact on one or more of the protected characteristic groups Advance equality of opportunity for one or more of the protected characteristic groups

Foster good relations between people who share a protected characteristic and those who don't

(insert Yes when there is an impact or No when there isn't)

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	No	Yes	-
Disabilty	No	Yes	-
Gender reassignment	No	Yes	-
Marriage/civil partnership	No	Yes	-
Pregnancy/maternity	No	Yes	-



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Race	No	Yes	-
Religion/belief	No	Yes	-
Sex	No	Yes	-
Sexual orientation	No	Yes	-
Other (eg low income groups)	No	Yes	-

4. Summary of the likely impacts

Who will be affected?

How will they be affected?

The SCI sets out how the council will manage consultation on planning policy and planning applications. It recognises the needs of different groups and provides a range of methods to encourage and support people and organisations to participate in planning consultations.

5. What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

What alternative ways can the Council provide the service? Are there alternative providers?

Can demand for services be managed differently?

6. Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Review of SCI to meet legal requirements	Planning Service	June 2029

7. Recommendation

The recommendation by the lead officer should be stated below. This may be: to proceed with the change, implementing the Action Plan if appropriate, consider alternatives, gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why. Proceed with revisions to updated Statement of Community Involvement.

8. Authorisation

The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director



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