



Ms C Smith
Planning Policy
Regeneration, Community and Culture
Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR

26 May 2017

Dear Ms Smith

Medway Council Local Plan: Development Options 2012 - 2035

Thank you for consulting CPRE Kent on the above document. Please find our comments on the consultation document, the Sustainability Appraisal and the Habitat Regulations Assessment.

We hope that you will give serious consideration to our representations, and we would be glad to meet and discuss with you our concerns and suggestions should you find this helpful.

Yours sincerely,

Jillian Barr

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent, TN27 0AD Fax: 01233 714549 Email: info@cprekent.org.uk

Phone: 01233 714540 www.cprekent.org.uk

Medway Local Plan 2012 – 2035 Development Options (Regulation 18 Consultation Report)

Paragraph 2.7 identifies the key concerns of local people about growth at Medway. It is essential that an effective and deliverable Local Plan is prepared that is capable of directing and managing this growth. To this end, it is essential that individual sites are viable and deliverable, but it is also important to ensure that the cumulative impact of sites across the planning area on infrastructure capacity and the environment is understood and planned for.

Developing a vision for 2035

A strong and ambitious vision is necessary to deliver growth, protect the environment, but also to deliver improvements to the environment and community health.

Paragraph 2: The first sentence needs to be clearer. ‘Secured’ should be replaced with ‘*protected and enhanced*’. Delete the second half of the sentence, since this seems to suggest that conservation relies on development. The use of the word ‘*intrinsic*’ is unclear.

Paragraph 4: Planned growth should also deliver ‘*access to nature*’ as well as education, health and community services. Green Infrastructure and recognition of the wider benefits of ecosystem services is an important NPPF theme. Growth should not ignore these important aspects, essential to healthy communities.

Paragraph 8: Should refer to ‘*adapted*’ to climate change, as well as ‘*address and mitigate*’. References to enhancing the understanding of landscape scale biodiversity conservation, the contribution of agricultural land to local sustainability, and an understanding of the value of ecological services to well-being, resilience and livelihoods would be welcomed. These are essential to Medway’s future and while paragraph 2.36 recognises the importance of a quality environment, real enhancements are necessary. It is not just a challenge of perception.

Strategic Objectives

A riverside city connected to its natural surroundings.

This section should refer to ecosystem services. As well as ‘protecting’ ecosystems and other aspects of the natural environment from development, we should invest in improving ecosystems for successful development and healthy communities.

Bullet Point 2: *Adaptation* to climate change must be a priority (as well as mitigation) since some significant climate change is already inevitable.

Bullet point 3: This section should refer to the importance of agricultural land, and the conservation of soil, for local sustainability.

Medway recognised for its Quality of Life

This section should refer to the importance of meeting air quality objectives. The links between access to nature, space, dark skies and tranquillity and the health of communities should also be recognised. CPRE strongly supports Bullet Point 3. Securing a range of accessible services and facilities for local communities is essential for sustainable and healthy local communities. However, there is a strong relationship between this, and the scale of opportunities that can be identified for new homes. The first half of sentence should explain what is meant by 'role' and clarify the relationship between: the services and facilities available to a community; the extent to which the community can be considered sustainable; and scale of appropriate development.

Delivering Sustainable Development Options.

Scenario 1: Maximising the potential of urban regeneration.

Paragraph 3.18 refers to the SHLAA, which includes: land allocated in the 2003 Local Plan, sites included in development briefs and masterplans, and areas put forward by landowners in response to a 'call for sites'. CPRE believes that the Council should demonstrate it has gone further than this to identify appropriate sites in sustainable locations. A proactive assessment of urban sites should be undertaken to identify underused sites or vacant sites that might contribute to regeneration and meeting the housing need. Some of these sites may be publically owned or they might require effort on the part of the council to assemble land and facilitate development. Sites may be small in size, but small sites are an important element of supply, make an important contribution to meeting development needs, and can be particularly valuable in the early years of the plan. Housing estate redevelopment is also emerging as a sensible option to deliver regeneration and optimise development density. This approach is supported in the Housing White Paper 2017.

Further work is needed to demonstrate that the Council has proactively sought brownfield sites. It is noted that a modern employment park would be developed around an extended Kingsnorth on the Hoo Peninsula. Although this proposal will make housing land available, might improve the appearance and quality of sites at Medway City Estate and Chatham Docks, and would provide leisure and shopping facilities, it remains that a detailed assessment of the travel implications (and thereby sustainability implications) of this proposal needs to be carefully assessed. Clearly a close relationship between homes and employment is normally preferable, and to mitigate this weakness, a fast and regular bus service would need to be investigated. CPRE is concerned this will not amount to a sustainable option. It is suggested that as well as leisure and retail, the Council should investigate the potential for incorporating office floor space in the development mix.

Although apartment living in the Medway area may be considered a drawback, it is evident that the availability of land in this locality is particularly constrained. Large areas are already considered urban and undeveloped urban edge sites and parks are likely to be highly valued given their scarcity. Family houses with gardens are development priorities in most local planning authority areas in Kent. This will be harder to achieve in Medway, and urban apartment living, together with excellent access to services and facilities, will need to make a notable contribution to the housing supply in the Medway Council area.

In terms of the Habitats Directive requirements, it is also worthy of note that it is not only homes that need to mitigate their impact on the SPA. Further investigation would be needed to determine the mitigation necessary to avoid impacts on the integrity of the SPA from employment and tourism/leisure development on the peninsula.

Scenario 2: Suburban expansion

Most local planning authorities identify urban edge sites at principal towns and other well served settlements to meet housing needs. These sites are often considered the most sustainable alternative to urban sites, given accessibility to public transport, employment and other services and facilities. They are normally less remote than sites in the open countryside.

Given the extent of urban development at Medway and the scarcity of countryside that remains close to the urban area (easily accessible to the urban population), the option of suburban expansion should be approached with caution and on a site by site basis.

Sites indicated as potential development sites at the eastern boundary in this scenario occupy some of the last areas of undeveloped land in the borough south of the Medway. Subject, of course, to layout and design, it is likely that the loss of land in these locations will be considered unfortunate, reducing the accessibility of local people to space and the opportunity walk beyond the urban edge. This is a particular problem to the north west of Rainham, where remaining countryside will be almost entirely eroded. It is also clearly a concern that development at this location would have a direct impact on the SPA (during both construction and operation).

The countryside around Capstone represents another locally valued landscape, and includes the Capstone Valley Country Park. Together, land in this locality performs the function of a 'green lung' stretching right from the M2 to almost the A2. It is a really attractive valley landscape, which is enjoyed by both local people and visitors. It is important that communities in urban areas have access to tranquillity and open landscapes, and this serves as a valued resource for the Medway community. The landform does mean that it is possible to enjoy as sense of remoteness within the valley, away from the urban edge.

The Housing White Paper and recent ministerial statements give some additional advice on when it is appropriate to release land in the Green Belt. The requirement to demonstrate exceptional circumstances does, however, remain and this included the need to demonstrate that all reasonable options have been explored.

It is evident that the potential to release sites at the urban edge in the Medway area is not straight forward. It is not possible to agree that this is the most sustainable option, without a site by site assessment of available land, which should consider the extent to which sites are enjoyed by local people, the value attached to landscape and access to countryside, the intrinsic value of a rare resource and the impact on the SPA.

On the mapping (Appendix 1c), the green hatch makes it difficult to understand the urban edge close to the potential urban edge sites, by washing into the urban area. It could be considered misrepresentative of the extent of remaining countryside at the urban edge.

Scenario 3: Hoo Peninsula Focus

A Hoo Peninsula focus for a future development strategy is unlikely to amount to a sustainable strategy because of a range of challenging constraints. The lack of rail services and a very constrained highway network that already suffers from congestion and poor resilience, means that transport infrastructure will be a key issue. The Council has not demonstrated how it proposes to overcome this critical issue and ensure a shift to sustainable transport modes. A transport model will be essential to demonstrate that local plan and infrastructure proposals ensure highway capacity on both the local and strategic highway network. CPRE is pleased to see that this work has been commissioned. Any development likely to contribute traffic on the A2, in particular, must also consider the extent to which it will delay the achievement of air quality targets.

Furthermore, CPRE is concerned that a large proportion of land on the Hoo Peninsula is Best and Most Versatile agricultural land. This should be investigated in detail so that agricultural land quality information is available for decision making purposes. Existing data is not accurate at the site level. While there is land of lower grades on the peninsula, much of this is designated for its habitat interest. Given the national and international importance of habitats on the peninsula and the value of agricultural land it is essential that this division is clearly understood. It is essential that the agricultural land quality and habitat type of proposal sites is defined by site survey. Clearly the outcome of the 'Lodge Hill' planning inquiry is critical. The Council's Landscape Character Assessment should assist when determining the suitability of this option. Much of the landscape is very visible or locally valued.

In terms of the Lodge Hill Development, CPRE recognises that designation of Chattenden Woods and Lodge Hill as a SSSI recognises the national importance of this mosaic of habitats. The Council indicates that its future will be determined by the outcome of a planning inquiry scheduled for 2018. Given this uncertainty CPRE agrees that it shouldn't be phased early in the period of the plan.

Finally, it is the view of CPRE Kent that an increase of housing development of this quantum would require further review of the SAMMS to ensure that management and mitigation measures necessary to conclude 'no likely significant effect' are identified to the satisfaction of Natural England and other competent authorities. The original SAMMS did not specify the numbers of houses anticipated in the Medway area. Although the success of the SAMMS is not very sensitive to detailed housing numbers, there must be a point at which recreation management is insufficient, or proximity to protected sites has a direct impact. It is therefore important to continue discussing the SAMMS and monitoring outputs with the North Kent Environmental Planning Group to ensure it remains adequate. To wait for deterioration to occur would not constitute adequate protection for the purposes of the Habitats Directive, and would risk delivery of housing elsewhere in the North Kent. Monitoring, as required by the SAMM should be available in the evidence base to the local plan.

Scenario 4: Urban Regeneration and a Rural Town

It is inevitable, given the difficult choices to be made in the Medway area, the final suite of sites will be a combination of the options consulted on. It is important that sites, however, are selected according to a sustainable development strategy. Allocation of sites to meet the development strategy is normally guided by a settlement hierarchy, which establishes the sustainability of settlements, with site choice guided by

SHLAA assessments, sustainability appraisal and other consultations with statutory consultees, parishes, forum and other local community /interest groups.

CPRE would like to emphasise the importance of a proactive assessment of urban sites to identify underused sites or vacant sites that might contribute to regeneration and meeting the housing need. Some of these sites may be publically owned or they might require effort on the part of the council to assemble land and facilitate development.

Section 4: Housing

Housing Need

CPRE has previously commented on the SHMA 2015 (letter dated 24th March 2016). This comment concluded that it is important to remember that Objectively Assessed Need should not be used as a proxy for a target, which can only be determined following a proper consideration of environmental and infrastructure constraints, including consideration of the cumulative impact of development. Clearly these constraints are significant in the Medway area and consideration of the proposed SHLAA sites, together with the cumulative impacts of development may result in a conclusion that resultant housing targets need to be constrained.

Referring to the 'policy approach: housing delivery', CPRE notes the reference to phasing allocations to ensure a supply over the plan period. This point is critical and CPRE asks that the council does not seek to rely wholly on very large strategic sites. Smaller sites, including urban sites, are crucial to delivering a 5 year supply in the early years of the plan.

Housing Mix

The NPPF recommends that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. They should also identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. CPRE supports the provision of an appropriate housing mix, type, size, tenure and range, but urges the council to think proactively about the extent to which housing needs can be met at higher densities should construction and planning excellence and quality lifestyle be given particular attention.

Affordable housing

In terms of affordable housing, it is agreed that the % requirement for affordable housing delivery does need to respond to viability testing of the plan. A variable affordable housing requirement may be appropriate if viability is different in different parts of the planning area. It seems unfortunate that the Council is not consulting explicitly on the evidence of initial assessment (i.e. 25%), since the views of landowners would have assisted in drafting the publication version of the plan. As well as the affordable housing requirement, the policy should emphasise the importance of meeting local demand in terms of the size, type and tenure of housing, and establish policy criteria for exception sites at rural centres to meet local needs.

Section 5: Employment

It is noted that a modern employment park would be developed around an extended Kingsnorth on the Hoo Peninsula. Although this proposal will make housing land available, might improve the appearance and quality of sites at Medway City Estate and Chatham Docks, and would provide leisure and shopping facilities, it remains that a detailed assessment of the travel implications (and thereby sustainability implications) of this proposal needs to be carefully assessed. Clearly a close relationship between homes and employment is normally preferable, and to mitigate this weakness, a fast and regular bus service would need to be investigated. CPRE is concerned this will not amount to a sustainable option.

An up-to-date regeneration strategy does not appear to have been published yet. CPRE would, of course, support proposals which seek to intensify and enhance the employment offer of existing employment sites in sustainable locations, but a detailed strategy is required to ensure an alignment between site location and the demands of business, supported by suitable employment formats and public realm. The Council should complete its regeneration strategy before finalising decisions on the location of new employment sites, and consolidation or format changes of existing sites.

The Impact of employment development on the SPA is an important issue that needs to be resolved in advance of submission and the Council should consider whether development (including employment sites such as Kingsnorth) can mitigate their impact on the SPA, so that adverse effects on the significance of designated interest features are avoided. This is cumulative assessment.

Rural economy

In terms of rural economy, CPRE is pleased that the Council has recognised the importance of farming and forestry uses in the area. It is important to understand this issue in detail. Swale Borough Council prepared a study titled '*value of best and most versatile agricultural land in Swale*' and a similar piece of work would be helpful in this area too. This information, together with a detailed understanding of the agricultural land quality of proposed development sites is important information for deciding on a development strategy and select a suite of development sites.

The policy approach refers to directing development to lesser quality (missing word) agricultural land, where 'feasible'. Use of the word 'feasible' word is not helpful to decision making in the planning context and the policy should instead refer to sustainable locations and / or 'where it satisfies the agreed development strategy'.

Similarly, in terms of tourism and leisure activities, these should also be directed to sustainable locations.

Section 7: Natural Environment and Green Belt

Policy Approach: Strategic Access Management and Monitoring.

CPRE Kent supports the inclusion of a policy setting out the tariff contribution expectation for new development within 6 km of the designated sites. The policy should make clear that large developments

and employment / tourism developments may also be required to make a contribution to access management measures. The amount of housing development anticipated within 6km of the North Kent Marshes is considerably greater than was anticipated when the strategy was produced in 2014 and the North Kent Environment Group should reflect on whether the proposed access strategy will continue to suffice as mitigation in the long term. Medway council should also be able to produce evidence of monitoring since the strategy was agreed. The policy, or the supporting text, should welcome on-site recreational space, but be clear that this would not replace defined tariff contributions.

Kent Downs Area of Outstanding Natural Beauty

In terms of the North Downs woodlands, air quality is a significant factor affecting their integrity in some locations. Assessment of air quality should be a cumulative assessment taking into account development in neighbouring districts. The importance of cumulative assessment was highlighted in a recent high court case: *Wealden District Council v Secretary of State for Communities and Local Government & Ors. Case Number: CO/3943/2016*. There are relevant sites in and close to the Medway area.

Medway's Green Infrastructure network

CPRE Kent is pleased to see that the Council recognises the multi-functional benefits of the GI network and supports references to the 'landscape scale' habitat conservation and environmental resilience. At paragraph 7.11 it would be preferable if the reference to 'landscape services' was replaced with 'ecosystem services' which has an aesthetic and recreation element. It is important, however, that the plan focuses more on the biodiversity conservation value of the GI network and should refer to habitat connectivity, movement of species and climate change resilience, and biodiversity opportunity areas. A separate policy would be appropriate.

Policy Approach: Securing strong Green Infrastructure

The proposed policy approach reflects the necessary recognition of a hierarchy of designations. The wording does, however, need to reflect the relevant legislation, and 'highest', 'high level' and 'consider' will not suffice to distinguish the different levels of protection. Similarly the references to the Kent Downs AONB fail to emphasise the statutory duty of regard, and the emphasis on 'great weight' in the NPPF.

The policy tries to incorporate numerous subject areas in the 'policy approach' box, including green infrastructure, wildlife designations, landscape designations, undesignated landscapes, local green spaces, and the Public Rights of Way Network as a single policy area. CPRE encourages the council to consider separating them into separate policies to avoid too much confusion. As above, the policy should refer to ecological networks and Biodiversity Opportunity Areas.

The policy should demonstrate an understanding of the biodiversity duty and ensure that development and development decisions take account of biodiversity and secure enhancements.

In terms of Local Green Spaces, CPRE encourages the Council to undertake a separate consultation on this issue. Local communities do not know about the designation nor understand its value, and Councils are

frequently beginning examinations with few or no proposals. Swale Borough Council was instructed to carry out a 'call' for local green space proposals at a very late stage in the local plan preparation process.

Landscape

CPRE is pleased to see the Council is updating the Landscape Character Assessment. The council is encouraged, however, to continue with designation of development gaps and areas of local landscape importance. These have been supported by Inspectors at numerous local plan examinations, including at Swale and Canterbury, since they are an expression of the value of landscapes to local people. A landscape character policy is important too and this can guide decision making on both designated and undesignated landscapes. CPRE hopes that the Council includes landscape scale biodiversity mapping and opportunities for biodiversity network enhancements in the landscape character assessment. A landscape scale approach to biodiversity conservation can be used to identify areas which provide the greatest opportunities for habitat creation. The Landscape Character Assessment should be adopted as SPD.

Green Belt

CPRE notes the intention to carry out a review of the Green Belt to assess if land meets the purposes established in national policy. The Council is urged to consult on the outcomes of the review prior to publishing a final Local Plan. It is very important that the views of local people contribute to the Regulation 19 version of the Local Plan, particularly if any revisions to the Green Belt boundary are proposed.

As discussed earlier in this representation, the Housing White Paper and recent ministerial statements give some additional advice on when it is appropriate to release land in the Green Belt. The requirement to demonstrate exceptional circumstances does, however, remain and this includes the need to demonstrate that all reasonable options have been explored.

Flood Risk

CPRE supports a policy on flood risk and agrees that it should take account of climate change forecasts as they relate to extent and frequency of flooding. Appropriate sustainable urban drainage methods should be incorporated in new development, and this should contribute to open space and biodiversity enhancements.

Air quality

CPRE supports the proactive policy approach to air quality. The policy should refer to the need to meet pollutant limit values within the AQMAS in the shortest possible time. The plan should refer to cumulative assessments of air quality.

Transport modelling (underway) and air quality modelling will be necessary to assist the council to determine whether local plan allocations are deliverable.

Section 8: Built Environment

Policy Approach: Design

Fundamental considerations of development proposals, set out in the proposed 'design' policy approach should also include the following:

1. Development should respond positively to designated and undesignated landscape character.
2. Development should respond to the cultural and historic qualities of its location and historic assets and landscapes should be protected, enhanced and revealed as appropriate.
3. Development should be proactively designed to reduce carbon emissions. This should include passive design principles incorporated at the earliest design stages, to use site layout and orientation which makes use of local climate and site conditions.
4. Reference to SuDS as part of landscaping schemes that provide biodiversity and place-making benefits as well as surface water management.

Policy Approach: Housing design

Kent has been declared an area of severe water stress by the Environment Agency. As such, CPRE supports the Council's proposal to adopt the lower 'optional' requirement of 110l/p/day for new residential development. CPRE remains, however, concerned about the environmental costs of increased water stress, due to climate change and increasing extraction. The anticipated housing numbers in the Southern Water (and South East Water and Thames Water in part) planning area are unlikely to accurately reflect the projected housing growth in local authority areas and this should be continually reviewed. Water stress concerns should be capable of triggering a review of the local plan.

The local plan should not solely rely on energy efficiency Building Control targets and should proactively encourage housing design (including orientation and site and room layout) to improve energy efficiency.

Policy Approach: Housing Density

CPRE broadly supports the housing density policy. Given the pressure for housing land in the Medway area, development density will be an important theme. A site by site assessment to respond to existing densities is important, but a clear policy approach should be provided in the plan to provide guidance. Development densities have been falling in numerous local authority areas as a result of more generous layouts to meet demands for larger (and often executive) family homes. The council should encourage high quality developments at higher densities (subject to setting and character constraints), since the availability of sustainable sites in the Medway area is very limited.

Policy approach: Heritage

The final policy on Heritage should ensure the 'special regard' for listed buildings and their setting is clearly reflected in the policy. The approach suggested does not yet reflect the importance of protection, conservation, enhancement, revealing and management of heritage assets. The policy and supporting text

should go much further than suggested, to ensure a presumption in favour of conservation, clarify the importance of 'setting' and describe the value of local distinctiveness and character.

CPRE would support the preparation of the heritage strategy for the area and notes that Dover District Council has prepared an excellent example.

Section 10: Infrastructure

It is essential that development decisions in the borough can be led by deliberate strategy that makes use of a detailed evidence base on infrastructure capacity and viability constraints. In particular, transport modelling is required to give a broad network picture and to also test transport interventions (in the form of committed improvements) and a package of the highway changes, and public transport improvements that will (at least in part) need to be funded by development.

The plan making process has a clear role to play in comprehensively considering development needs alongside implications for necessary supporting infrastructure – including health, education, green infrastructure, transport infrastructure and others. Clearly, this information is essential as part of determining whether this plan is deliverable in the long term and the Council should carry out a 'whole' plan viability assessment to ensure the chosen strategy and subsequently the detailed plan, are deliverable.

Section 11: Transport

CPRE is pleased to see that the Council has commissioned a new strategic transport model which can be used to test the impact of proposed development sites on highway capacity and reliability. In particular, this will allow the council assess the impact on areas with existing capacity issues, including the A2. It is essential that the impact on the network is identified so that decisions can be made in the public interest and a reliable transport network is achieved, which supports sustainable transport modes. This is a critical part of the local plan evidence base.

CPRE also hopes that the Local Transport Plan will be amended so that it demonstrates the necessary support for growth proposed in the Local Plan. It should contain the range of interventions that will be necessary to support growth. Not all the necessary interventions are implemented by development in the local plan.

Clearly, the impact of a Lower Thames Crossing will need to be considered, as will current and projected capacity issues on the strategic road network, and associated junctions.

A policy approach to improve air quality is supported, and indeed essential in AQMAS

Transport and the River Medway

In terms of proposed policy approaches relating to 'transport and the river Medway', 'waterfront and river access' and 'marinas and mooring', there are clearly conflicts with the internationally protected nature conservation response. Clearly, recreation is a significant concern in this locality and the Habitats Regulation Assessment must consider this issue. The impacts of employment and recreational uses on the

river should be carefully understood and should not be exempt from contributions to the management strategy.

Scoping Report

The Scoping Report should not be subject to consultation at the same time as the Interim Sustainability Appraisal. Some amendments may be required to the Scoping Report and Sustainability Framework, and this would have 'knock-on' effects for the final agreed sustainability appraisal framework.

The report appears to have been completed by the Council, and CPRE recommends that Medway Council commission specialist consultants to carry out subsequent appraisal to ensure independence and adherence to the SEA regulations.

In terms of the process of preparation, the process followed is not very clear in the report. The SA Framework should be based on a review of other plans and programmes, baseline analysis and identification of key sustainability issues. The process followed by Medway Council appears to not follow the normal procedure of setting SA objectives as a result of the key objectives and issues arising from the review of plans and programmes, and the key sustainability issues identified through analysis of the baseline conditions. The process needs to be clarified, and CPRE recommends expert review at this stage to check the process is correct.

In terms of the SA Framework in table 2, this is also not clear. SA Objectives are not the same as SEA objectives and the framework should instead list SA Objectives and indicate SEA Directive Topics in bold, or as a separate column.

The Objectives are very brief and probably go too far to rationalise key issues and objectivess. Some key issues are absent. For example none of the objectives, nor key questions, appear to satisfactorily approach the issue of biodiversity. To resolve this, Objective 4 in the framework should read 'conserve and enhance **biodiversity and promote improvements to** the District's Green Infrastructure Network'. There should be key questions relating to conserving and enhancing protected sites, and species diversity. Other key questions could relate to ancient woodland cover and ecological connectivity. Indicators proposed also demonstrate a lack of attention to biodiversity (even in other SA objectives) and this should be resolved.

Although it is recognised that the transport issue has been incorporated in SA objective 5, it is the view of CPRE that there should be a transport SA objective. Similarly a separate water SA objective would be helpful. Currently 'adapt and mitigate the impacts of climate change' conflates biodiversity, water stress, allocation of allotments and flood risk. These shortcomings will not be helpful to the Council when assessing sites.

Habitat Regulations Assessment

Habitats Regulations Assessment

CPRE agrees that contribution to the Strategic Access Management and Monitoring Strategy is the appropriate means by which to ensure that recreation impacts of development is mitigated. It is our view, however, that there has been a significant change in the housing targets that local authorities in the North Kent Environment Group are expected (or potentially expected) to deliver. Although the SAMMS is designed to be flexible and is not very sensitive to housing numbers, this step-change in the new homes anticipated in the area must be potentially relevant in cumulative impact terms in sensitive locations. CPRE is concerned that the NKEG have not yet published monitoring evidence and summary updates on the success of the management strategy, which has now been in place for a number of years. It is essential that the views of NKEPG are sought to confirm with evidence) that they remain of the view that the recreation impact (and the associated contribution) will be mitigated by the Strategic Access and Recreation Management Plan. There is a disappointing level of information currently and it would be inappropriate to wait for deterioration to occur before responding to potential impacts of development. CPRE understands work is now underway.

CPRE Kent disagrees with the Council's assessment in paragraph 3.77 that it is unlikely that development in the emerging plan alone would have adverse effects on the integrity of the SAC through increased atmosphere pollution. North Kent Woodlands SPA, which abuts the A249 north of Maidstone, already exceeds the critical load for Nitrogen Deposition. The exceedance of the identified critical load means, when applying the precautionary principle, that there may be an impact on the favourable status of the SAC in the future. It is not appropriate, at this stage, to dismiss the impact because it is a small area. At this stage, the Council should determine whether increase in traffic levels is likely to be significant. A significant increase in traffic relates to an additional 1000 vehicle movements per day and a 1% increase in pollutants. To meet both of these thresholds would denote a likely significant effect. Measurements are cumulative, i.e. they should incorporate contributions from neighbouring local authorities. Recent case law is relevant: Suffolk Coastal District Council (Appellant) v Hopkins Homes Ltd and another (Respondents)