

Report

Land to the North of The Drove Way, Istead Rise,
Gravesham

Habitats Regulations Assessment - Screening Report

For Ptarmigan Land A Ltd

3 June 2026

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1 Introduction

1.1 Purpose of the Report

This report has been produced to assist in the preparation of a Habitats Regulations Assessment (HRA) by the Competent Authority Gravesham Borough Council for a new residential development targeting up to 100 homes (the Proposed Development), in Land to the North of The Drove Way, Istead Rise, Gravesham (hereafter referred to as 'the Site').

This assessment is based on the current illustrative framework plan¹. The design and layout of the Proposed Development is expected to evolve through the design process and would be subject to confirmation at the application stage. The location and extent of the Site is shown on **Figure 1-1**. The Proposed Development comprises development for up to 100 residential dwellings (Class C3), including the formation of new accesses from The Drove Way, the provision of new areas of public open space and all other associated infrastructure and ancillary works (all detailed matters reserved other than means of access).

This assessment provides the Competent Authority with the necessary ecological information regarding the Proposed Development with respect to its potential for Likely Significant Effects (LSEs) upon the qualifying features of European sites in the UK (i.e. those which form part of the National Site Network).

This report has been prepared by Logika Consultants Ltd on behalf of Ptarmigan Land A Ltd and is provided without prejudice.

This report sets out:

- An overview of the HRA process;
- Protected sites considered relevant to the Proposed Development;
- The qualifying features and conservation objectives of the relevant protected sites;
- Identification of pathways and impacts considered; and,
- Screening of potential impacts.

¹ Mosaic (2026). Land at Istead Rise, Gravesham - Illustrative Masterplan V3. Drawing number: 006.

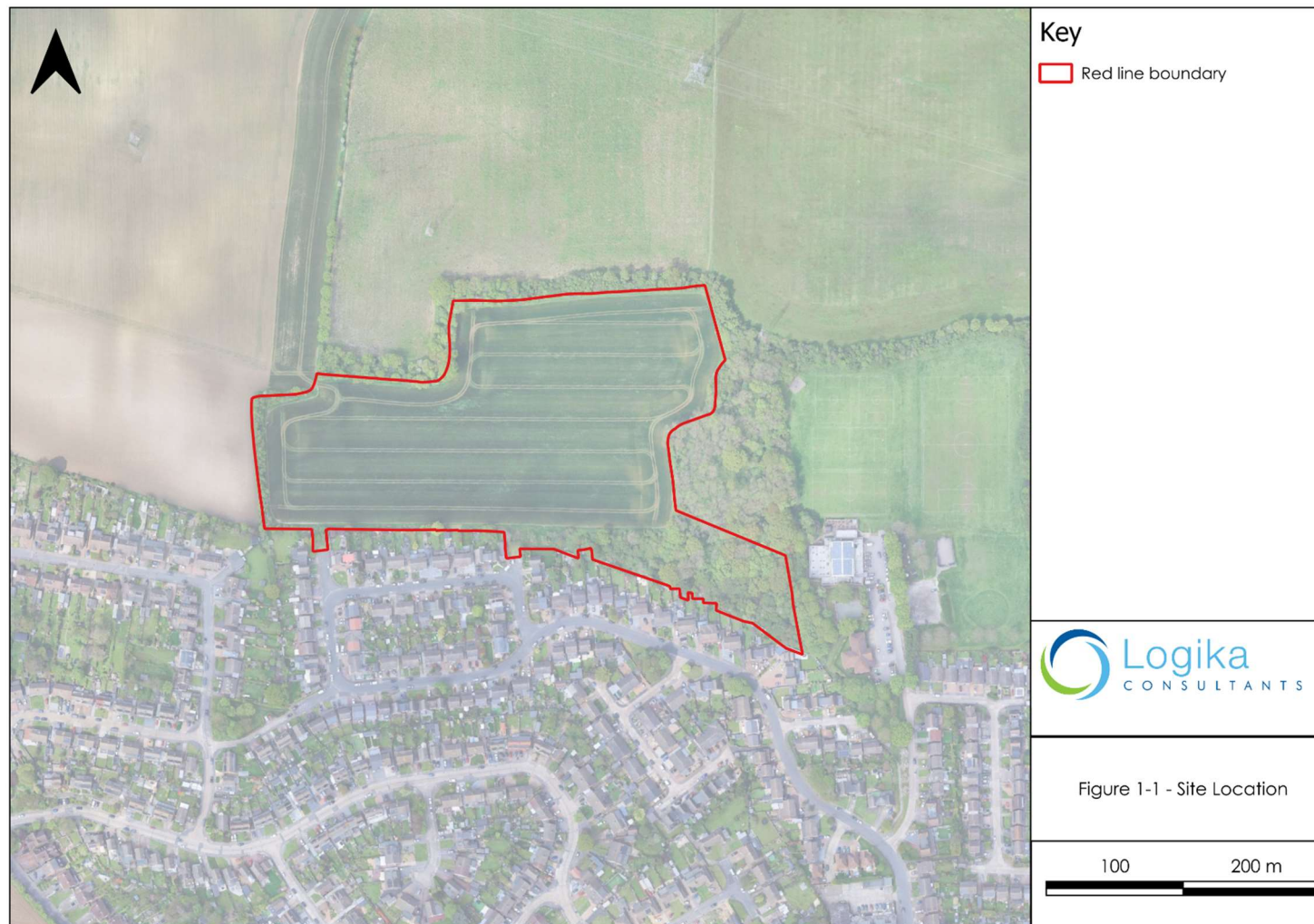


Figure 1-1: Site Location

2 Legislative Context

The requirement for HRA for plans and projects is established under European Directives 92/43/EEC and 2009/147/EC (the 'Habitats directive' and the 'Birds directive', respectively), transposed into English law by the Conservation of Habitats and Species Regulations (2017), as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Collectively, these are referred to as the 'Habitats Regulations'.

The overarching goal of the Habitats and Birds Directives are to uphold or restore the "favourable conservation status" of habitats and species recognised as of European Community Interest. These specific habitats and species are outlined in the Habitats and Birds Directives, with the designation of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) aimed at safeguarding the most vulnerable among them.

Under the amendment made by the 2019 Regulations, SACs and SPAs in England no longer form part of the European Union's Natura 2000 network, but form part of a national site network in England which include:

- existing SACs and SPAs; and,
- new SACs and SPAs designated under the 2019 Regulations.

Wetlands of International Importance, known as Ramsar sites, are not officially part of the national site network. However, many coincide with Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and may be designated based on the same or different qualifying features. Despite this distinction, Ramsar sites receive the same level of protection as European sites².

Under article 6(3) of the Habitats Directive, any plan or project not directly connected with or necessary to the management of a European site, but would be likely to have a LSE on such a site, either individually or in combination with other plans or projects, shall be subject to a HRA.

Plans or projects can only be authorised if it can be concluded by the Competent Authority that it will not adversely affect the integrity of the European site in view of the site's conservation objectives. The exception to this is where there are Imperative Reasons of Overriding Public Interest (IROPI) and there are no other feasible alternatives, which would not affect the integrity of the European site. In this case the Competent Authority must assess all compensatory measures required to ensure the protection of the overall coherence of the national site network.

In fulfilling its role as Competent Authority, the precautionary principle must be applied, and conclusions drawn on the best available scientific evidence.

² European sites are Special Areas of Conservation (SAC) and Special Protection Areas (SPA). As a matter of Government policy proposed SACs, potential SACs, Ramsar site and areas secured as sites compensating for damage to a European site are also treated in the same manner.

3 Habitats Regulations Assessment

3.1 Overview

The HRA process is a systematic method for assessing whether a plan or project will have a LSE on a European site. Government agencies provide relevant guidance, including:

- Habitats Regulations Assessment: protecting a European site (2021)³; and
- Appropriate assessment – Guidance on the use of Habitats Regulations Assessment (2019)⁴.

In determining whether or not a plan or project can be adopted or consented, the competent authority must comply with Regulation 63 of the Habitat Regulations:

“63(1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which –

- Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*
- Is not directly connected with or necessary to the management of the site,*
- must make an appropriate assessment of the implications for the site in view of that site's conservation objectives.”*

“63(2) A person applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.”

“63(5) In the light of the conclusions of the assessment, and subject to regulation 64, the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).”

“Where in accordance with 64 –

- a. A plan or project is agreed, notwithstanding a negative assessment of the implications for a European site or a European offshore marine site, or*
- b. A decision, or a consent, permission or other authorisation, is affirmed on review, notwithstanding such an assessment,*

The appropriate authority must secure that any necessary compensatory measures are taken to ensure that the overall coherence of Natura 2000 is protected.”

In order to undertake an assessment that accords with legislation, a staged process has developed over time that has been shaped by guidance and case law.

There are three recognised stages to the HRA process. These being:

³ Department for Environment, Food & Rural Affairs, Natural England, Welsh Government and Natural Resources Wales (2021); Habitats Regulations Assessment: protecting a European site, last updated December 2023

⁴ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (2019); Appropriate assessment – Guidance on the use of Habitats Regulations Assessment.

Stage 1 – Screening. This stage identifies LSE that may occur due to the implementation of a plan or project alone or in-combination with other plans and projects in the absence of mitigation. If LSE are identified, assessment at Stage 2 is required. In the event that no LSE are identified, no further assessment or stages are necessary;

Stage 2 – Appropriate assessment. This stage focuses on establishing, beyond reasonable scientific doubt, whether any of the LSE may adversely affect the integrity of a European site in light of its conservation objectives, either alone or in combination with other plans and projects; where no adverse effect on site integrity is identified Stage 3 is not necessary. This Report presents the findings of the Appropriate Assessment at Stage 2;

Stage 3 – Derogation. This stage considers an assessment of alternatives. Where an adverse effect on site integrity is concluded, it is necessary to determine whether there are alternatives to the proposed plan or project that would avoid or lessen the effects on a European site(s). It also considers Imperative Reasons of Overriding Public Interest (IROPI). Where there are no alternative solutions available, an IROPI assessment is undertaken to determine the need for the plan or project with respect to the type and scale of the public benefit.

The Proposed Development can be considered “a project” with reference to the Habitats Regulations making it necessary for the competent authority to undertake an appropriate assessment of LSE on European sites as a result of the project alone and in-combination with other plans and projects. This Shadow HRA screening covers Stage 1 only:

Regulation 63 of the Habitats Regulations requires the competent authority to undertake Stage 1 Screening for HRA and where necessary Stage 2 Appropriate Assessment of any plan or project. Stage 3 and 4 are included under Regulations 64 and 68 respectively.

With respect to Stage 2, the integrity of a European Site relates to the site's conservation objectives and has been defined in guidance as “*the coherent sum of the site's ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated*”. An adverse effect on integrity, therefore, is likely to be one which prevents the site from making the same contribution to favourable conservation status for the relevant feature as it did at the time of designation.

The HRA screening process uses the threshold of LSE to determine whether effects on European sites should be the subject of further assessment. The Habitats Regulations do not define the term LSE. However, in the Waddenzee case (Case C127/02), the European Court of Justice found that an LSE should be presumed and an Appropriate Assessment (AA) carried out if it cannot be excluded on the basis of objective information that the plan or project will not have significant effects on the conservation objectives of the site concerned, whether alone or in combination with any other project. The Advocate General's opinion of the Sweetman case (Case C-258/11) further clarifies the position by noting that for a conclusion of an LSE to be made “*there is no need to establish such an effect...it is merely necessary to determine that there may be such an effect*” (original emphasis).

Subsequently, a LSE is, in this context, any appreciable effect that may reasonably be predicted as a consequence of a plan or project that may affect the conservation objectives of the features for which the site was designated but excluding trivial or inconsequential effects. The word ‘likely’ is regarded as a description of a risk (or possibility) rather than in a sense an expression of probability.

4 Stage 1 – Screening Methodology

Government guidance⁵ describes the screening stage as a preliminary check to determine whether a proposal:

- is directly connected with or necessary for the conservation management of a European site;
- risks having a significant effect on a European site on its own or in combination with other proposals.

As the Proposed Development is not directly connected to the conservation management of European sites, it must be assessed for potential significant effects, either alone or in combination with other plans programmes or projects.

The screening process has two potential outcomes:

- No LSE on the conservation objectives of the European site; or
- LSE identified, or cannot be ruled out, on one or more of the conservation objectives of the European site, triggering the need for an AA.

Discounting potential effects must be based on objective, scientific evidence or the absence of an effect pathway. Proposed or potential mitigation measures cannot be considered during the screening stage in accordance with the judgement made in Case C-323/17⁶ (known as 'People over Wind') in 2018. Therefore, the screening assessment below does not take into account any measures or policy that are specifically intended to reduce harmful effects on a European site(s).

To identify potential effects, it is essential to evaluate the impacts of construction, operation (including maintenance), and decommissioning on designated features and supporting habitats, including functionally linked land.

Functionally linked land has been defined as follows (Chapman & Tyldesley 2016)⁷: "The term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of an International 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 International Site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status."

To identify international sites that support mobile features, a precautionary Zones of Influence (Zoi) has been to screen in potentially affected European sites. The Chartered Institute of Ecology and Environmental Management (CIEEM) defines a Zoi as:

"The Zone of Influence for a project is the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities."

⁵ Department of Environment, Food and Rural Affairs, Natural England, Welsh Government and Natural Resources Wales (2023) Habitats regulations assessments: protecting a European site. Available at <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site#screening> [accessed 07/02/2025]

⁶ Transcript of judgement C323/17 available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62017CJ0323> [accessed 20/01/2025]

⁷ Chapman, C. & Tyldesley, D. 2016. 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. Natural England Commissioned Reports, Number207

The North Kent Strategic Access Management and Monitoring Scheme (SAMMS)⁸ identifies that residential development within 6km of the coastline is likely to lead to increases in recreational activity within the designated sites. This distance reflects visitor survey evidence available at the time and was used to define the area within which mitigation measures are typically applied, rather than defining an ecological limit to bird disturbance. As the Site sits within 6km of the coastline, and in the absence of evidence demonstrating that effects would be limited to this distance, a precautionary ZOI is used within this HRA screening assessment at 10km for non-breeding birds based on mean flight distances published by Johnson et al. 2014⁹.

4.1 Key Documents

This document has been prepared with reference to the following key documents and sources:

- European Site Conservation Objectives: supplementary advice on conserving and restoring site features ¹⁰
- European Commission (EC) (2001) Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC;
- Habitats Regulations Assessment of the Medway Local Plan ¹¹
- Gravesham Local Plan Habitats Regulations Assessment Scoping Report ¹²
- Gravesham Borough Council Local Plan and Strategy Review ¹³
- Kent Nature Partnership Biodiversity Strategy 2020 to 2045 ¹⁴
- North Downs Woodland SAC JNCC Standard Data Form ¹⁵

⁸ Liley, D & Underhill-Day, J. (2014). Thames, Medway & Swale Estuaries – Strategic Access Management and Monitoring Strategy. Available at: <https://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/Local-Plan-2014/140722-Strategic-Access-Management-and-Monitoring-Strategy-FINAL.pdf>

⁹ Johnson, W.P, Schmidt, P.M & Taylor, D.P. (2014) Foraging flight distances of wintering ducks and geese: a review. *Avian & Conservation Ecology* 9(2): 2

¹⁰ Natural England (2000). European Site Conservation Objectives: supplementary advice on conserving and restoring site features. North Downs Woodlands Special Area of Conservation (SAC) Site Code: UK0030225. Available at: <https://publications.naturalengland.org.uk/publication/5717001544663040> [accessed 12th February 2026].

¹¹ Lepus Consulting (2023). Habitats Regulations Assessment of the Medway Local Plan. Regulation 18: Setting the direction for Medway 2040. Preliminary HRA report. Available at: https://www.medway.gov.uk/downloads/file/8411/habitats_regulations_assessment_of_the_medway_local_plan_2023 [accessed 26th March 2026].

¹² LUC (2020). Gravesham Local Plan Habitats Regulations Assessment Scoping Report. Gravesham Borough Council. [accessed 12th February 2026].

¹³ Gravesham Borough Council. LOCAL PLAN AND STRATEGY REVIEW. Available at: <https://www.naturerecoverykent.org.uk/wp-content/uploads/2025/01/Gravesham-local-plan-and-strategy-review-pdf> [accessed 12th February 2026].

¹⁴ Kent Nature Partnership Biodiversity Strategy 2020 to 2045. Available at: <https://kentnature.org.uk/wp-content/uploads/2022/01/Kent-Biodiversity-Strategy-2020.pdf> [accessed 12th February 2026].

¹⁵ JNCC (2015). Standard Data Form for Special Areas of Conservation. Site UK0030225 North Downs Woodlands. Available at: <https://sac.jncc.gov.uk/site/UK0030225> [accessed 12th February 2026].

- Peter's Pit SAC JNCC Standard Data Form ¹⁶
- Thames Estuary and Marshes SPA Standard Data Form ¹⁷
- Thames Estuary and Marshes Ramsar Information Sheet ¹⁸

Additional guidance, documents and information sources used to inform this report are referenced throughout where used.

4.2 Activities and Effects

This section scopes potential impact pathways by looking at activities and effects during the construction and operational period of development. Different impact pathways (for instance air quality, water and recreational pressure) may have a different geographical coverage, and these differences are also considered within this section.

The following impact pathways are considered because of the Proposed Development:

Construction

- Change of land use including ground clearance for construction sites (including laydown areas, staff facilities etc.), enabling works and accesses – habitat loss, degradation and fragmentation which may impact habitats or species associated with qualifying features for designated sites.
- Temporary disturbance from noise, light and dust pollution – disturbance of wildlife by disrupting feeding, breeding and resting behaviour, causing short-term displacement from otherwise suitable habitat.
- Water levels and quality – reduction in vegetated areas and creation of developed surface could alter hydrology through changes in run off, altering water levels. Run-off from urban areas can also increase pollution in nearby catchments.

Operation

- Permanent changes to land use – habitat loss, degradation and fragmentation which may impact upon habitats or species associated with the qualifying features of the site.
- Air quality – increased traffic emissions have the potential to increase atmospheric emissions of pollutants to the air. These can result in adverse effects at habitats sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)
- Recreational pressure - Increased residential development has the potential to increase recreational pressure upon sites which are accessible to the public

¹⁶ JNCC (2015). Standard Data Form for Special Areas of Conservation. Site UK0030237 Peter's Pit Available at: <https://sac.jncc.gov.uk/site/UK0030237> [accessed 12th February 2026].

¹⁷ Natural England (2000). Thames Estuary and Marshes SPA Standard Data Form. Available at: <https://publications.naturalengland.org.uk/publication/3227002> [accessed 12th February 2026].

¹⁸ JNCC (2000). Thames Estuary and Marshes Ramsar. Ramsar Information Sheet. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11069.pdf> [accessed 12th February 2026].

5 Information to Inform the Assessment

5.1 Description of the Project

The Proposed Development is at the outline application stage, and the current illustrative framework plan aims to provide up to 100 residential dwellings (Class C3), including the formation of new accesses from The Drove Way, the provision of new areas of public open space and all other associated infrastructure and ancillary works (all detailed matters reserved other than means of access).

This assessment considers likely significant effects of the illustrative framework plan, whilst the design choice is being finalised. The design and layout of the Proposed Development is expected to evolve through the design process and will be confirmed at the Reserved Matters stage.

5.2 Site Context

The Proposed Development is located within the village of Istead Rise, Gravesham, Kent. The Site comprises of an area of land under agricultural production which is bounded to the north and west by further agricultural fields, to the east by woodland, and the south by a residential estate. Road access to the Site is through The Drove Way located to the south of the Site within the village of Istead Rise.

The location and extent of the Site is shown on



Figure 1-1.

5.3 European Sites

Table 5-1 and **Figure 5-1** identify relevant European and Ramsar sites within 10km of the scheme boundaries and outlines their qualifying features, as described within the corresponding citations, *NATURA 2000 forms*.

The Conservation objectives of a European site are a statement of standards which must be met to maintain (or restore) the qualifying features of the European Site at (or to) "favourable conservation status" (FCS). The conservation status will be taken as "favourable" when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitat(s);
- the natural range of the species is neither being reduced, nor is likely to be reduced, for the foreseeable future; and,
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Some of the qualifying interests for which the sites identified are designated for may rely on habitats outside of the designated sites boundaries. Critically, such habitats (also known as functionally linked land (FLL)) can play an essential role in maintaining qualifying habitats/species populations and may therefore have the potential to affect the integrity of the European site.

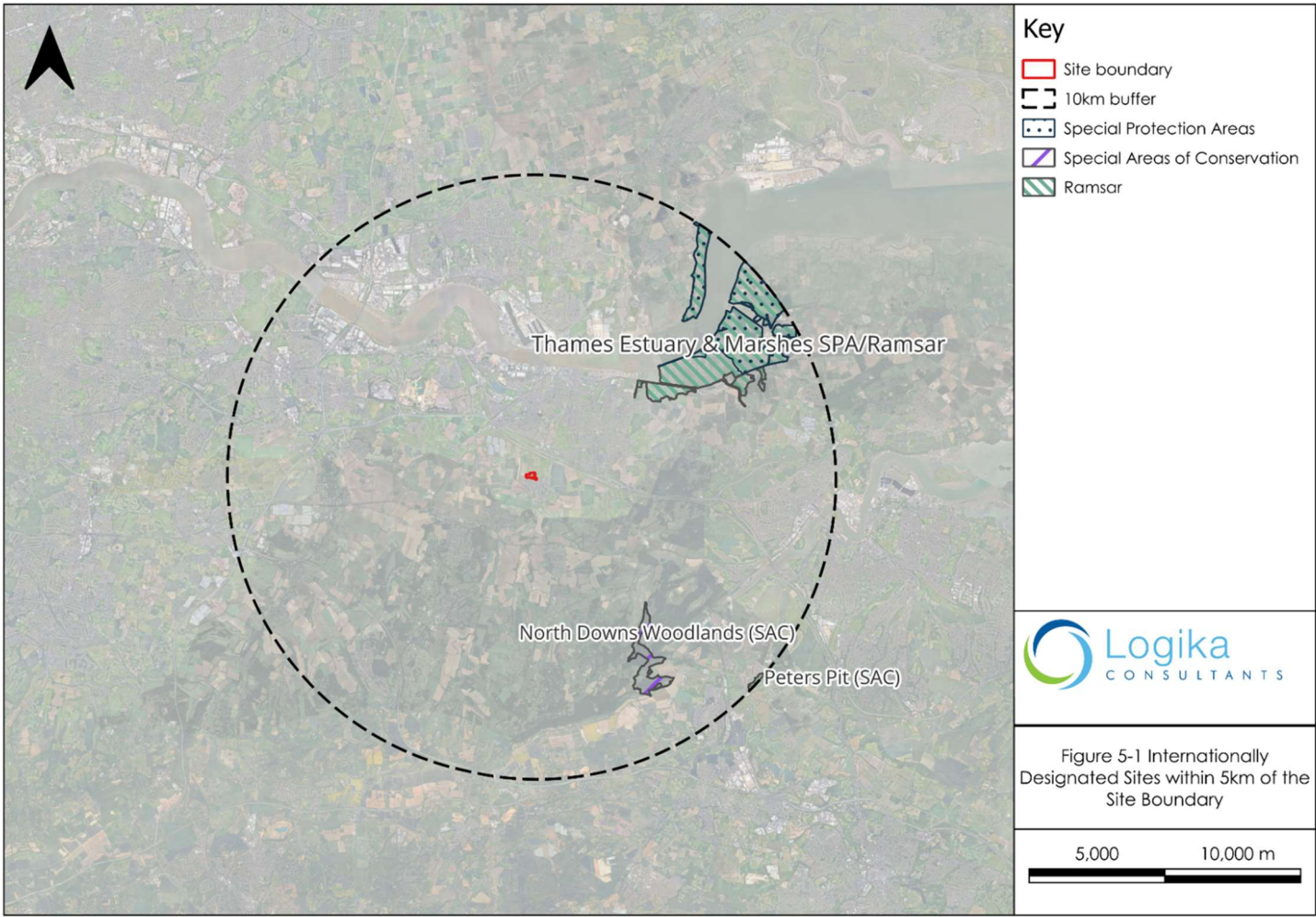


Figure 5-1: Internationally Designated Sites within 10km of the Site

Table 5-1: Summary of European and RAMSAR Sites within 10km of the Site

European Site	Distance and Direction	Qualifying Features
Thames Estuary and Marshes Ramsar UK11069	4.62km northeast	Ramsar criterion 2 The site supports one endangered plant species and at least 14 nationally scarce plants of wetland habitats. The site also supports more than 20 British Red Data Book invertebrates. Ramsar criterion 5 Assemblages of international importance: Species with peak counts in winter: 45,118 waterfowl (5 year peak mean 1998/99-2002/2003) Ramsar criterion 6 – species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: Ringed plover <i>Charadrius hiaticula</i> - 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> – 1,640 individuals, representing an average of 4.6% of the GB population (5-year peak mean 1998/9-2002/3) Species with peak counts in winter: Grey plover <i>Pluvialis squatarola</i> – 1,643 individuals, representing an average of 3.1% of the GB population (5-year peak mean 1998/9-2002/3) Red knot <i>Calidris canutus</i> – 7,279 individuals, representing an average of 1.6% of the population (5-year peak mean 1998/9-2002/3) Dunlin <i>Calidris alpina alpina</i> – 15,171 individuals, representing an average of 1.1% of the population (5-year peak mean 1998/9-2002/3) Common redshank <i>Tringa totanus</i> – 1,178 individuals, representing an average of 1% of the GB population (5-year peak mean 1998/9- 2002/3)
North Downs Woodland SAC UK0030225	5.99km southeast	Annex I habitats that are a primary reason for selection of this site: 9130 <i>Asperulo-Fagetum</i> beech forests This site includes mature <i>Asperulo-Fagetum</i> beech forests for which this is one of the best areas in the United Kingdom. 91J0 <i>Taxus baccata</i> woods of the British Isles * Priority feature

European Site	Distance and Direction	Qualifying Features
		The site includes Yew <i>Taxus baccata</i> woodland, associated with 9130 <i>Asperulo-Fagetum</i> beech forests, scrub and small areas of unimproved grassland on thin chalk soils. The site is considered to be one of the best areas for this habitat in the United Kingdom. Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)
Thames Estuary and Marshes SPA UK9012021A	6.02km north-east	ARTICLE 4.1 QUALIFICATION (79/409/EEC) Over winter the area regularly supports: Hen harrier <i>Circus cyaneus</i> - 1% of the population in Great Britain. 5-year peak mean 1993 - 1998 Pied avocet <i>Recurvirostra avosetta</i> - 28.3% of the population in Great Britain. 5-year peak mean 1993 - 1998 ARTICLE 4.2 QUALIFICATION (79/409/EEC) Over winter the area regularly supports: Dunlin <i>Calidris alpina alpina</i> - 2.1% of the population of Great Britain. 5-year peak mean for 1993 - 1998 Red knot <i>Calidris canutus</i> - 1.4% of the population of Great Britain. 5-year peak mean for 1993 - 1998 Black-tailed godwit <i>Limosa limosa islandica</i> - 2.4% of the population of Great Britain. 5-year peak mean for 1993 - 1998 Grey plover <i>Pluvialis squatarola</i> - 1.7% of the population of Great Britain. 5-year peak mean for 1993 - 1998 Redshank <i>Tringa totanus</i> - 2.2% of the population of Great Britain. 5-year peak mean for 1993 - 1998 On passage the area regularly supports: Ringed plover <i>Charadrius hiaticula</i> - 2.6% of the population of Great Britain. 5-year peak mean for 1993 - 1998 ARTICLE 4.2 QUALIFICATION (79/409/EEC): AN INTERNATIONALLY IMPORTANT ASSEMBLAGE OF BIRDS Over winter the area regularly supports: 75,019 waterfowl (5-year peak mean 21/03/2000) including: <i>pied avocet</i>, <i>grey plover</i>, <i>red knot</i>, <i>dunlin</i>, <i>black-tailed godwit</i>, <i>redshank</i>.
Peter's Pit SAC UK0030237	10km southeast	Annex II species that are a primary reason for selection of this site: <i>Triturus cristatus</i> for which this is considered to be one of the best areas in the United Kingdom.

5.4 Information on Qualifying Features

Information pertaining to the potential impacts of the Proposed Development and the presence of fauna or flora species which are qualifying features of European sites, has been used to establish whether the Site and surrounding area is functionally linked to the European Sites identified, this included a combination of desk study and field surveys, as detailed in the section below.

5.4.1 Desk study

The desk study included a review of local documents pertaining to the designated sites such as conservation management plans, and Local plan HRA's to identify the current condition and likely pressures and significant effects from development on the designated sites. A review of research undertaken on the core ranges and mean flight distances of bird species associated with the SPAs and Ramsar sites was also undertaken in the assessment of functionally linked land.

5.4.2 Field surveys

The following field surveys were undertaken to inform the Ecological Impact Assessment (EclA) of the project:

- An extended habitat survey of the Proposed Development following UK Habitat Classification was undertaken on 4th April 2025 by a suitably experienced and qualified ecologist. **Figure 5-2** shows the results of the habitat survey.
- Breeding bird surveys undertaken between May and June 2025 to record the presence of birds within or around the Proposed Development, including territory mapping¹⁹.
- Bat surveys comprising a Preliminary Roost Assessment (PRA) and activity surveys. The PRA was undertaken on 4th April 2025, which assessed and identified any trees with the potential to support roosting bats. The activity surveys were undertaken between June 2025 and October 2025, and April 2026 and May 2026. This comprised deploying static detectors along habitats/features that were considered to provide suitable foraging and commuting opportunities for bats. This information would be used to identify how the Site is utilised by local bat populations, and inform the need for any specific mitigation measures to mediate for any potential impacts.²⁰
- Badger survey undertaken on 11th March 2026 to identify any setts or field signs that indicate use by badger within the Site.²¹

¹⁹ Logika (2026). Istead Rise_Breeding Birds Report. Document Reference: 16611A- 30-R04-01-F

²⁰ Logika (2026). Istead Rise_Bat Report. Document Reference: 16611A-30-R08-01-F

²¹ Logika (2026). Istead Rise_Badger Report. Document Reference: 16611A-30-R07-01-F



Figure 5-2: UK Habitat Classification Survey

5.4.3 Consideration of functionally linked land

Thames Estuary and Marshes SPA and Ramsar

The Site is located approximately 4.62km from the Thames Estuary and Marshes Ramsar site and 6.02km from the Thames Estuary and Marshes SPA. Intervening urban areas and major road infrastructure, including the A2, separate the Site from this designated site and limit ecological connectivity. In addition, areas of more suitable habitat are present between the Site and the designated sites.

The extended habitat survey shows the Site comprises predominantly of cereal cropland, together with areas of woodland, scrub and field margins (see **Figure 5-2**). These habitats are unsuitable to support the qualifying bird species associated with the SPA and Ramsar site, including ringed plover, grey plover, red knot and redshank, which are typically associated with coastal and wetland habitats. Although hen harrier may utilise agricultural land within the wider landscape for foraging, the species is typically associated with coastal wetlands and marshes during the winter period; which these habitats are absent from the Site. Furthermore, the relatively small size and enclosed nature of the Site further reduce its suitability for qualifying species which generally utilise larger open areas.

As such, the Site is not considered to function as functionally linked land in relation to the Thames Estuary and Marshes SPA and Ramsar site and does not provide supporting habitat within the relevant ZOI.

Peter's Pit SAC

The Site is located approximately 10km from Peters Pit SAC, with extensive intervening urban and agricultural land separating the Site from the designated site.

GCN typically have a dispersal and foraging range of up to 500m from breeding ponds. The distance between the Site and Peters Pit SAC exceeds the known dispersal range of GCN and as such, the Site is not considered to function as functionally linked land in relation to the SAC. The Site also does not provide supporting habitat within the relevant Zone of Influence for this impact pathway.

5.4.4 Hydrology

The ZOI for hydrological pathways can vary depending on local geology and topography. For the purposes of screening potential effects within this assessment, a precautionary ZOI of 500m has been applied.

No ponds or other waterbodies are present within 500m of the Site, and all designated sites considered in this assessment are located beyond this distance. In the absence of any watercourses or waterbodies providing a hydrological connection between the Site and the designated sites, there is no plausible pathway for effects via surface water or groundwater to occur.

5.4.5 Air pollution

Current government guidance requires that air pollution impacts from new residential developments is rigorously assessed where they could affect designated nature conservation sites. Natural England's updated standing advice on air pollution and development states that designated sites within 200m of roads could be impacted by increases in air pollution²². For residential developments, this includes roads outside of the development which may experience increased traffic because of the

²² Natural England (2025). Air pollution and development: advice for local authorities Available at: <https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities> [accessed 26/03/2026].

development. If this is likely, then likely significant effects must be screened to determine whether the increased traffic would exceed critical loads or levels.

The designated sites considered in this assessment are all located more than 4.5km from the Site. At these distances, any emissions from the Proposed Development would be highly dispersed and would not result in pollutants exceeding critical loads or levels at the sites. Therefore, there are no likely significant effects should occur.

5.4.6 Recreational pressures

Table 5-2 provides information and supporting justification for the screening of recreational pressure effects on designated sites.

Table 5-2: Recreational pressures on designated sites

Designated site	Supporting information and justification
Thames Estuary and Marshes Ramsar	The Medway Local Plan Development Strategy²³ indicates that recreational pressure on European sites is expected to decrease with distance and applies a precautionary approach. It states that developments within approximately 6km of site access points is considered within the area of potential effects from recreational pressure. For screening purposes, a precautionary ZOI of 6km has been adopted as in line with the Local Plan Development Strategy above.
Thames Estuary and Marshes SPA	Following the Medway Local Plan Development Strategy²³ for recreational pressure described above, a precautionary ZOI of 6km has been adopted.
North Downs Woodlands SAC	The Medway Local Plan HRA¹¹ Error! Bookmark not defined. followed research undertaken at the Boxley Warren Local Nature Reserve (LNR), which forms part of the Wouldham to Detling Escarpment SSSI component of the SAC. A survey was undertaken 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 scoping report, taking the approach that residential development within 7km of the SAC could result in an increase of recreational use.
Peter's Pit SAC	The Medway Local Plan Development Strategy²³ identifies that recreational disturbance is not a relevant impact pathway for Peter's Pit SAC, and the site is excluded from assessment in relation to recreational pressure.

²³ Arup (2018). Medway Local Plan Development Strategy Interim Consideration of the Implications of Development Strategy Scenarios on European Sites.

Designated site	Supporting information and justification
	As such, no Zone of Influence is defined for recreational pressure for this receptor.

6 Stage 1: Screening

Activities and effects of the Proposed Development which may potentially affect qualifying interests of European sites and the European Site itself have been identified and are described in **Table 6-1**.

Table 6-1: Likely significant effects relating to biodiversity

Activity	Effect	Zone of Influence	Sites Screened In	Sites Screened Out and Justification
Construction				
Change of land use including ground clearance for construction sites (including laydown areas, staff facilities etc.), enabling works and accesses.	Degradation and/or loss of habitat (including through soil compaction).	Within the Proposed Development	N/A	Thames Estuary and Marshes SPA/Ramsar North Downs Woodland SAC Peter's Pit SAC There is no direct loss of habitat to any European Site. The Proposed Development is not located on land which is functionally linked to the Thames Estuary and Marshes Ramsar/SPA.
Temporary disturbance from visual, noise, light and dust pollution	Disturbance and displacement of species susceptible to noise/visual disturbance resulting in a reduction of energy intake and/or an increase in energy expenditure potentially leading to a reduction in survival and productivity rates.	Within the Proposed Development and up to 400m from construction areas ²⁴	N/A	North Downs Woodlands SAC Peter's Pit SAC Thames Estuary and Marshes SPA/Ramsar <i>The Proposed Development is >400m from any European Site and does not impact any land considered functionally linked to the Thames Estuary and Marshes SPA/Ramsar</i>

²⁴ Johnson, W.P, Schmidt, P.M & Taylor, D.P. (2014) Foraging flight distances of wintering ducks and geese: a review. Avian & Conservation Ecology 9(2): 2

Activity	Effect	Zone of Influence	Sites Screened In	Sites Screened Out and Justification
Changes to hydrology through reductions in vegetation cover.	Changes to local hydrology resulting in changes or loss of surrounding habitats with subsequent effects on fauna that they support.	Within the Proposed Development and distances of up to 500m from construction areas	N/A	North Downs Woodlands SAC, Peter's Pit SAC, Thames Estuary and Marshes SPA/Ramsar <i>The Proposed Development is >400m from any European Site and does not impact any land considered functionally linked to the Thames Estuary and Marshes SPA/Ramsar</i>
Use of chemicals (e.g. fuels, solvents etc.) and liberation of pollutants and fine material through excavation, demolition or surface water flows during rainfall events	The introduction of toxic pollutants or sediments into the environment resulting in changes, loss or damage to terrestrial, freshwater or estuarine environments and the species they support.	Within the Proposed Development and distances of up to 1km from pollution source along connected watercourse	N/A	North Downs Woodlands SAC, Peter's Pit SAC, Thames Estuary and Marshes SPA/Ramsar <i>The Proposed Development is >1km from any European Site and does not impact any land considered functionally linked to the Thames Estuary and Marshes SPA/Ramsar</i>
Operation				

Activity	Effect	Zone of Influence	Sites Screened In	Sites Screened Out and Justification
Changes to air quality through increased atmospheric emissions of pollutants to the air.	These can result in adverse effects at habitats sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)	Within the Proposed Development and distances up to 200m.	N/A	North Downs Woodlands SAC, Peter's Pit SAC, Thames Estuary and Marshes SPA /Ramsar <i>There are no main roads within 200m of the European Sites which may be affected by increased levels of traffic and/or air pollution.</i>
Recreational impacts on designated sites	Increased residential development has the potential to increase recreational pressure upon sites which are accessible to the public	Within the Proposed Development and distances up to 7km.	Thames Estuary and Marshes SPA/Ramsar <i>As the Ramsar is within the within 6km²³ of the proposed development published evidence indicate that this could result in increased recreational pressure. The Thames Estuary and Marshes SPA, does not share the same border as the Ramsar site, with its closest point being 6.02km from the Proposed Development. On a precautionary basis both have been screened in for further consideration.</i>	Peter's Pit SAC <i>The designated site has limited public access and is not under pressure from increases in recreation and this will not impact on the qualifying features of the site.</i>

Activity	Effect	Zone of Influence	Sites Screened In	Sites Screened Out and Justification
			North Downs Woodlands SAC <i>As the SAC is within the within 7km of the proposed development there is potential for increased recreational pressure which could result in an impact on the European Site.</i>	N/A

7 Summary

7.1 Screening Outputs

Screening has identified LSEs associated with the construction and operational phases of the Proposed Development including:

North Downs Woodlands SAC and Thames Estuary and Marshes Ramsar/SPA

- Increased pressure from recreational impacts on designated sites

The potential impact listed above means that LSEs cannot be screened out at this stage and therefore a Stage 2 Appropriate Assessment will be required. Where possible, the Proposed Development will consider LSEs through design and will seek to avoid and minimise effects. However, it is anticipated that a range of mitigation measures will need to be developed.

Full details and measures will be developed and considered in a Stage 2 Appropriate Assessment report.

7.2 Further Work

In-combination effects will be considered as part of the Stage 2 Appropriate Assessment. This will include consideration of other relevant plans and projects that may act together with the Proposed Development to result in effects on designated sites through identified impact pathways, including recreational pressure, air quality and hydrological impacts.



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