



Supplementary Environmental Statement - Non-Technical  
Summary

for

AC Goatham and Sons Ltd

# LOWER RAINHAM, PUMP/BLOORS FARMS

September 2020

Our Ref: SRS/18-01307

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## FIGURE

NTS1 - Site Location Plan

QUALITY ASSURANCE

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2008.

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## INFORMATIVE

An Environmental Statement (ES) was submitted to Medway Council (MC) in May 2019 as part of a suite of documents accompanying an outline planning application. That application comprised:

- Up to 1,250 dwellings, comprising a mix of properties sizes at a medium density;
- Up to 1,000 sq. m of retail or other neighbourhood uses (Use Classes A1, A2, A3, A4 and A5, D1);
- A primary school (Use Class D1);
- A 60 bed extra care facility;
- An 80 bed care home;
- Open space, strategic landscaping and other green infrastructure, and
- Associated vehicular, cycle, pedestrian and drainage infrastructure, including a primary access onto Lower Rainham Road and a secondary access onto Pump Lane.

Regulation 25(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 allows for the provision of ‘further information’ to be submitted.

In March 2020, further information was submitted during the course of the determination of the application. This ‘further information’ did not result in any changes to the illustrative masterplan or the proposed development itself. This further information was summarised as follows -

- (i) Borehole and infiltration testing resulting in revisions and clarifications to drainage/flooding matters,
- (ii) Review of MC strategic highway modelling resulting in clarifications to highway/transportation matters,
- (iii) Clarifications in respect of air quality matters, and
- (iv) Clarifications in respect of agricultural matters.

This further information was collated into a Supplementary Environmental Statement (SES), March 2020 and associated Supplementary Non-Technical Summary (SNTS) March 2020, produced in accordance with the aforementioned Regulations.

On 12<sup>th</sup> June 2020 the application (MC/19/1566) was refused for a variety of reasons relating to heritage, landscape, transport and highways, recreational pressures on the European sites on nature conservation importance, loss of best and most versatile agricultural land and lack of a completed S106 Agreement to secure necessary infrastructure.

The applicant is submitting an appeal against the refusal of the application, and as part of that appeal process is seeking to narrow the range of issues to be discussed at Inquiry. As part of this process, further environmental survey work, consultation with appropriate statutory bodies and assessment has been undertaken. This is reflected by way of an update to the ES.

In accordance with the aforementioned Regulation 25(1) above, this further information has been collated into another SES dated September 2020. Supplementary Technical Appendices have also been produced where appropriate, as has a Supplementary Non-Technical Summary (SNTS) reflecting any changes to environmental circumstance.

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The further information described in the SES September 2020 and this SNTS September 2020, is summarised as follows:

- (i) Updates to policy and legislation where appropriate, including air quality,
- (ii) A new Landscape Visual Impact Assessment (LVIA) taking into account the points raised in the reasons for refusal no. 3, namely the Gillingham Riverside Area of Local Landscape Importance,
- (iii) A revised Heritage Setting Assessment taking on board the points raised in the reasons for refusal no.2, namely impacts on the listed buildings and adjacent conservation areas,
- (iv) Further review and work in relation to highway and transport matters raised in reasons for refusal nos. 4,5 and 6,
- (v) Further review and information in relation to agricultural land quality and farm business financial viability in respect of reason for refusal no.8, and
- (vi) Updates to the parameter plans/illustrative masterplan, which reflect heritage and landscape buffer planting refinements.

Where parts of the ES/NTS May 2019 and the subsequent revisions made in the SES/SNTS March 2020 require deletion and /or replacement, this is noted in the SES September 2020 and this SNTS September 2020. Within the SES and SNTS, chapter amendments to text, figures, tables are identified in *red italics*. **Technical Appendix, Figure and Table** amendments are suffixed by the letter '*a*' replacing the version in the ES May 2019 - any further revisions of these are suffixed by the letter '*b*'. Supplemental information to be read in conjunction with the original numbered technical appendix is suffixed by the letters '*sup*'.

For ease of reading, this SNTS follows the exact same format and chapter numbering as the May 2019 NTS and its SNTS March 2020.

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## 1 INTRODUCTION

- 1.1 There are no amendments to this chapter of the NTS 2019/SNTS March 2020 save to note that comments should be provided to the Secretary of State via the Planning Inspectorate.

## 2 THE EIA PROCESS

- 2.1 There are no amendments to this chapter of the NTS 2019/SNTS March 2020, save to note that a separate new chapter 'Cumulative Effects' has been included as Chapter 16 within the ES.

## 3 BACKGROUND TO THE DEVELOPMENT

- 3.1 There are no amendments to this chapter of the NTS 2019/SNTS March 2020, save to note the inclusion of the following reasons for refusal of application MC/19/1566 as new paragraph 3.8 -

*(3.8) At the time of the application submission in May 2019, there was no planning history of relevance. Subsequently, on 12<sup>th</sup> June 2020 MC refused the application for the following reasons:*

- 1. Insufficient information has been provided in relation to mitigation measures, and no agreement has been reached to secure such measures, which are necessary to ensure that there will be no adverse impact on the integrity of the Medway Estuary & Marshes SSSI, SPA and Ramsar site as a result of the additional recreational pressures caused by the proposal. In the absence of imperative reasons of overriding public interest, Regulations 63 and 70 of the Habitats Regulations require permission to be refused. In addition, the lack of information and mechanism to secure the mitigation also results in non-compliance with policies S6 and BNE35 of the Local Plan and NPPF paragraphs 175 & 176.*
- 2. The proposed development would have a harmful impact on the local historic landscape, as well as the setting and significance of an number of designated heritage assets, including: listed buildings (York Farmhouse (Grade II); Pump Farmhouse (Grade II); Chapel House (Grade II); 497-501 Lower Rainham Road (Grade II); The Old House (Grade II); Bloors Place (Grade II\*); a range of outbuildings including cart lodge and granary west of Bloors Place (Grade II); and, the garden walls to south and east of Bloors Place (Grade II)); and, two Conservation Areas (Lower Twydall; and, Lower Rainham). Applying the great weight which has to be given to the conservation of the designated heritage assets (by virtue of NPPF paragraph 193 and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990), the proposal is contrary to Local Plan policies BNE 12 and BNE18. In addition, as the public benefits of the scheme would not outweigh the harm to the designated heritage assets, the proposed development is also contrary to the NPPF paragraph 196.*
- 3. The proposed development would lead to significant long-term adverse landscape and visual effects to the local valued Gillingham Riverside Area of Local Landscape Importance (ALLI), which would not be outweighed by the economic and social benefits of the scheme, in conflict with Local Plan policy BNE34 and NPPF paragraph 170.*
- 4. The applicant has failed to satisfy Highways England that the development will not materially affect the safety, reliability and / or operation of the Strategic Road*

*Network (SRN). This is contrary the tests set out in department for Transport Circular 2/13 paragraphs 9 & 10 and the NPPF at paragraph 109.*

- 5. The cumulative impact from the increased additional traffic cannot be accommodated on the highway in terms of overall network capacity without a severe impact. This is contrary to Local Plan policy T1 and the NPPF at paragraph 109.*
- 6. The cumulative impact from the increased additional traffic from the development is unlikely to be able to create a safe highway environment. This is contrary to Local Plan policy T1 and the NPPF at paragraph 109.*
- 7. No assessment nor technical details have been provided regarding the two new access points along Pump Lane to serve the proposed development, therefore it has not been possible to appropriately assess the adequacy of these access points. This is contrary to Policy T1 of the Medway Local Plan 2003 and paragraph 109 of the NPPF.*
- 8. The proposed development would result in the irreversible loss of 'best and most versatile' (BMV) agricultural land, contrary to Local Plan policy BNE48 and the NPPF at paragraph 170 and footnote 53.*
- 9. In the absence of a completed S106 legal agreement, the proposal fails to secure infrastructure necessary to meet the needs of the development. This is contrary to Local Plan policy S6 and the NPPF at paragraph 54.*

3.2 *An appeal has been lodged in respect of the application refusal.*

## 4 DEVELOPMENT DESCRIPTION

4.1 There are no amendments to this chapter of the NTS 2019/SNTS March 2020, save for the following parameter plan references in paragraph 4.2 and the changes to Table NTS1 -

- Land Use Parameter Plan (ref. 11047 PL 006**B**) (ES Figure 2.1**a**)
- Building Heights Parameter Plan (ref. 11047 PL 004**B**) (ES Figure 2.2**a**)
- Movement Parameter Plan (ref.11047 PL 007**B**) (ES Figure 2.3**a**)
- Green/Blue Infrastructure Parameter Plan (ref. 11047 PL 005**B**) (ES Figure 2.4**a**)

Table NTS1: Land Use Budget

Use	Area (Hectares)	Amount
Residential (Class C3)	29.78	Up to 1,250 dwellings
Village Green	1.12	
Local Centre	0.64	Up to 1,000sqm floor space
Primary School	2.6	
Care Home and Extra Care Facility	1.23	Up to 140 bed spaces
Green and blue infrastructure	15.69	

- 4.2 These minor changes reflect refinements to the Proposed Development design that have arisen from further consideration of the surrounding heritage and landscape/visual environment.

## 5 ALTERNATIVES

- 5.1 There are no amendments to this chapter of the NTS 2019/SNTS March 2020.

## 6 POLICIES AND CONTEXT

- 6.1 There are no amendments to this chapter of the NTS 2019/SNTS March 2020.

## 7 ENVIRONMENTAL EFFECTS

### AGRICULTURAL LAND

- 7.1 There are no amendments to paragraphs 7.2 - 7.6 of the NTS 2019/SNTS March 2020.

### ECONOMY, POPULATION AND SOCIETY

- 7.2 The significance criteria used to define the level of impact in the ES May 2019 (paragraph 7.22) used the word 'slight' to describe a small change of low importance. For consistency with other chapters, this has been revised to '*minor*' throughout the ES May 2019 Economic, Population and Society chapter. This revision is thus reflected in Table NTS1 of this SNTS August 2020.

- 7.3 Paragraph 7.10 of the NTS May 2019 refers to the potential for D1 (health care) uses on site within the local centre. As a result of changes to the Town and Country Planning (Use Classes) Order 1987 (as amended), which come into effect on 1<sup>st</sup> September 2020, class D1 will become part of the new Class E. In addition, the Proposed Development will exacerbate existing capacity issues with local GP services with a financial contribution towards this facility creating a minor adverse impact. Thus paragraph 7.10 of the NTS May 2019 is amended to -

*(7.10) The effect on health services would be **minor adverse as a result of existing capacity issues within the local area**. The Proposed Development would, however, deliver **a number of** health benefits by encouraging community inclusion, healthy neighbourhoods, active lifestyles and through new housing provision. The Proposed Development makes provision for a local centre to include scope for **Class E uses (formally class D1 uses)**. Proposed on-site facilities would have a beneficial impact resulting from improved facilities for both existing and future residents.*

- 7.4 Paragraph 7.14 of the NTS May 2019 identifies that there is sufficient capacity within the existing healthcare service to accommodate both the need arising from the Proposed Development and the identified committed developments that have planning permission. This has been re-assessed and found that with financial contributions to health services, capacity issues can be reduced. Thus, the amendment to paragraph 7.14 is as follows -

*(7.14) The cumulative impacts **as a result of the committed developments identified in the cumulative assessment (table 2.6 of the ES May 2019 refers)** would lead to increased demand on health services and community facilities. **These impacts are mitigated by contributions via S106 Agreements**. Moreover, the Proposed Development includes provision for onsite facilities that could include health or community services.*



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## WATER RESOURCES

- 7.5 There are no amendments to paragraphs 7.17 - 7.20 of the NTS 2019/SNTS March 2020

## GROUND CONDITIONS/CONTAMINATION

- 7.6 There are no amendments to paragraphs 7.21 - 7.25 of the NTS 2019.

## TRANSPORTATION

- 7.7 Whilst there are no amendments to paragraphs 7.26 - 7.29 of the NTS 2019/SNTS March 2020, the following should be noted:
- 7.8 As part of the appeal consultation process with Council Highways, Highways England, additional information has been submitted in relation to -
- (i) Accident data on the road network,
  - (ii) Detail on the site access arrangements,
  - (iii) Updated information on trunk road traffic impacts as a result of minor re-assignment of traffic on the wider road network, and
  - (iv) Detail on the public transport strategy.
- 7.9 The conclusion is that the Transport Assessment (Technical Appendix 10.1) is robust, no further assessment is necessary, and the mitigation proposed to various highway junctions is more than sufficient. As such, there is no amendment to the conclusions of the effects of the Proposed Development as set out in the ES May 2019.
- 7.10 The additional information has been provided as a Technical Note to supplement the original submission - **Technical Appendix 10.1<sup>sup</sup> September 2020**.

## ECOLOGY AND CONSERVATION

- 7.11 There are no amendments to paragraphs 7.30 - 7.44 of the NTS 2019/SNTS March 2020.

## LANDSCAPE AND VISUAL AMENITY

- 7.12 There are no amendments to paragraphs 7.44 - 7.46 of the 2019 NTS.
- 7.13 Paragraph 7.47 of the NTS 2019 is revised as follows -
- (7.47) The assessment has followed an iterative process **which** has fed into the emerging design and development of the parameter plans to ensure that any significant landscape and visual effects are identified and mitigated.
- 7.14 Paragraph 7.49 of the NTS 2019 is revised as follows -
- (7.49) The likely impacts and effects that may arise from the proposed development are reasonably limited and relate almost exclusively to the resulting effect of a change in land use and a change in the shape of the settlement envelope of Twydall and Rainham. Although the development would fundamentally change the appearance and nature of the **Site and the Lower Rainham & Lower Twydall Fruit Belt LLCA (moderate adverse) after 15 years of growth of the planting**, this would not cause a significant adverse change in the **overall** prevailing landscape and visual character of the wider area.

## AIR QUALITY

- 7.15 There are no amendments to paragraphs 7.50 - 7.57 of the NTS 2019/SNTS March 2020.

## ARCHAEOLOGY AND CULTURAL HERITAGE

- 7.16 There are no amendments to paragraphs 7.58 - 7.60 of the NTS 2019/SNTS March 2020, save to note that the impact on the Lower Rainham Conservation area has been reassessed as **moderate adverse** once the planting and landscaping mature over time.

## CUMULATIVE EFFECTS

- 7.17 A new section dealing with Cumulative Effects has been added to the ES and this NTS as follows as NTS paragraphs 7.61 to 7.65 -

*(7.61) Cumulative effects result from the combined impacts of multiple developments as well as multiple in-scheme impacts, for example, combined landscape and ecology impacts on the same sensitive receptor. The impacts from a single development or a single environmental impact may not be significant on their own but when combined with other developments or impacts these effects could become significant.*

*(7.62) The sites identified as cumulative sites in the assessment are set out in Table NTS3 below:*

*NTS3: Cumulative Development Sites*

<i>Site Name</i>	<i>Description of Development</i>	<i>Status</i>
<i>Land at Station Road, Rainham MC/14/0285</i>	<i>Development of 90 dwellings</i>	<i>Allowed on appeal</i>
<i>Land North of Moor Street, Rainham MC/14/3784</i>	<i>Development of 190 dwellings</i>	<i>Refused, but identified on the MC housing supply in the SHLAA</i>
<i>Land at Otterham, Quay Lane, Rainham MC/16/2051</i>	<i>Development of 300 Dwellings</i>	<i>Permitted Feb 2017</i>
<i>Berengrave Nursery, Rainham MC/17/3687</i>	<i>Development of 121 dwellings</i>	<i>Permitted Mar 2018</i>
<i>Land south of Lower Rainham Road, Rainham MC/17/1896</i>	<i>Development of 202 dwellings</i>	<i>Permitted August 2020, but also within MC housing supply in SHLAA</i>

- (7.63) The cumulative impacts assessment focuses on effects that were significant, therefore only receptors experiencing moderate or major adverse effects were included in the assessment.*
- (7.64) There are considered to be cumulative inter-related effects during construction between agricultural land (loss of existing horticultural landuse), landscape (loss of existing site character/features) and heritage (setting of Lower Rainham Conservation Area). These are of minor adverse significance.*
- (7.65) There are considered to be cumulative inter-related operational residual effects between landscape (effect of existing site character/features) and heritage (setting of Lower Rainham Conservation Area). This is of minor adverse significance.*
- (7.66) The potential for the other planned or committed developments within the study area to affect the sensitive receptors has been considered. There are considered to be no significant cumulative construction or residual operational effects, beyond*

*the moderate positive effect of increase in housing supply. It is assumed for the cumulative assessment that any mitigation proposed by the developers of these committed sites is fully executed and is successful.*

## 8 CONCLUSIONS

8.1 As a consequence of the above, there are no amendments to paragraphs 8.1 - 8.2 of the NTS May 2019/SNTS March 2020. Table NTS2 of the NTS 2019/SNTS March 2020 has been updated to reflect the amendments identified.

Table NTS2: Summary of Effects

TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
CONSTRUCTION					
Agricultural Land	Loss of agricultural land	Major Adverse (significant)	N/A	Significant	Major adverse (significant)
	Effect on Soil Resource	Moderate adverse	Site Waste Management Plan; a Soil Management Plan or similar	Slight	Slight adverse
	Impact on Agricultural Business	Major/Moderate adverse (significant)	Consolidation of business plan		Moderate adverse
Economy, Population and Society	Demographics: population count and demographic structure	Nil	N/A	N/A	Nil
	Economy and Employment	Minor Beneficial	N/A	N/A	Minor Beneficial
	Wealth and Deprivation	Negligible	N/A	N/A	Negligible
	Housing (house prices, tenure, composition)	Nil	N/A	N/A	Nil
	Education and Training	Negligible	N/A	N/A	Negligible
	Health, Community and Leisure	Nil	N/A	N/A	Nil
	Shopping	Minor Beneficial	N/A	N/A	Minor Beneficial
Water Resources	Fluvial Flood Risk	Negligible (not significant)		N/A	N/A

TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
	Water Quality - surface water	Slight adverse (not significant)	CEMP (embedded)	N/A	N/A
	Ground Water	Negligible (not significant)	CEMP (embedded)	N/A	N/A
	Foul Drainage	Negligible (not significant)	CEMP (embedded)	N/A	N/A
	Water Supply	Negligible (not significant)	CEMP and NMP (embedded)	N/A	N/A
Ground Conditions and Contamination	Human Health (Construction Workers)	Negligible	Standard operational health & safety. Embedded mitigation assumed site remediated if necessary prior to construction	N/A	Negligible
	Controlled Waters/ground water	Negligible	As above.	N/A	Negligible
	Ecological systems	Negligible. Slight adverse - RAMSAR	As above	N/A	Negligible
	Ground Stability Landslide	Slight adverse	As above	N/A	Negligible
Transport	Community Severance	Negligible	Construction Traffic Management Plan/CEMP	N/A	Negligible
	Driver and Pedestrian Delay	Negligible	Construction Traffic Management Plan/CEMP	N/A	Negligible
	Accidents and Safety	Negligible	Construction Traffic Management Plan/CEMP	N/A	Negligible
	Fear and Intimidation	Negligible	Construction Traffic Management Plan/CEMP	N/A	Negligible
Ecology and Conservation	Medway Estuary and Marshes SPA/SSSI/Ramsar -Contaminated run-off -Dust -Air quality -Water abstraction	Negligible	CEMP and refer to paras 15.115-117 of ES		Negligible

TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
	Non-statutory sites - LNR, LWS -Dust -Contaminated run-off -Noise	Minor adverse	CEMP and refer to para 15.115-117 of ES		Negligible
	Commercial orchard -Loss of habitat, but it is of little ecological value	Negligible	Replanting smaller area of orchard of quality better habitat	Permanent net loss of this habitat	Negligible
	Hedgerows/scattered trees -Loss of habitat -Damage to retained habitat -Dust	Negligible	Majority of hedgerows retained, for losses existing gaps or least sensitive location chosen, retained habitats protected, new hedge planting and sensitive management implemented. CEMP will prevent dust impacts.		Negligible
	Semi-improved grassland -Loss of habitat -Damage to retained habitat	Minor adverse	Replacement grassland with species rich mix	Permanent loss of this habitat	Minor adverse
	Foraging and commuting bats	Minor adverse	Refer to ES paras 15.101-104		Negligible
	Reptiles	Minor adverse	Refer to ES paras 15.115-118		Negligible
	Breeding Birds	Minor adverse	Refer to ES Technical Appendix 15.4		Negligible
	Badgers	Minor adverse	Refer to ES Technical Appendix 15.3		Negligible
Landscape	<i>Lower Rainham/Lower Twydall Fruit Belt LCA</i>	<i>Moderate/ Major Adverse</i>			
	<i>(Lower Rainham farmland LCA)</i>	<i>Minor adverse</i>			
	<i>Medway Shoreline &amp;</i>	<i>Minor adverse</i>			

TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
	<i>Marshes, Riverside Country Park LLCA</i>				
	<i>Site Features</i>	<i>Major adverse (Localised)</i>			
	<i>Users of Northern Shore</i>	<i>Minor adverse</i>			
	<i>Users south Motney Hill</i>	<i>Moderate adverse</i>			
	<i>Users north of Lower Rainham</i>	<i>Minor adverse</i>			
	<i>Users of Lower Rainham Road</i>	<i>Moderate / Minor adverse</i>			
	<i>Users Horrid Hill</i>	<i>Moderate adverse</i>			
	<i>Users Lower Bloor Lane</i>	<i>Moderate adverse</i>			
	<i>Users Lower Twydall Lane</i>	<i>Moderate adverse</i>			
	<i>Users of Bridleway</i>	<i>Moderate Adverse</i>			
	<i>Users of Pump Lane</i>	<i>Major Adverse (localised)</i>			
	<i>Users of trains passing Site</i>	<i>Minor / Moderate adverse</i>			
	<i>Residents of Twydall south of railway</i>	<i>Moderate / Major adverse (localised)</i>			
	<i>Residents on Pump Lane</i>	<i>Major adverse (localised)</i>			
	<i>Residents on Lower Bloor Lane</i>	<i>Minor / Moderate adverse</i>			
	<i>Residents Lower Rainham</i>	<i>Moderate</i>			

TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
		adverse			
	Residents Lower Twydall	Minor adverse			
Air Quality	From dust soiling	Major (substantial) (high according to IAQM guidance)	Refer to chapter 12 para 12.166 of ES		Negligible
	Human Health	Slight (low according to IAQM guidance)			Negligible
Archaeology and Heritage	Physical impact to the potential buried Site archaeology	Major adverse (significant)	Preservation by record (strip, map and sample)	The loss of the asset would be offset by knowledge gained	Moderate adverse
	Setting on designated assets - listed buildings	Minor adverse	CEMP, embedded mitigation (retention of existing planting)	As assessed	Minor adverse
	Setting of designated assets - conservation areas	Moderate adverse (Lower Rainham)	As above	As above	Moderate adverse (Lower Rainham)
		Minor adverse (Lower Twydall)			Minor adverse (Lower Twydall)
OPERATION					
Society, Population and Society	Demographics: population count and demographic stricture	Minor beneficial	N/A	N/A	Minor beneficial
	Economy and Employment	Minor Beneficial	N/A	N/A	Minor Beneficial
	Wealth and Deprivation	Nil	N/A	N/A	Nil
	Housing (house prices, tenure, composition)	Moderate Beneficial	N/A	N/A	Moderate Beneficial

TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
	Education and Training	Negligible	<i>Onsite primary,secondary financial contibution</i>	N/A	Negligible
	Health / <i>Community</i> Facilities	<i>Minor</i> adverse	<i>Financial contribution</i>	N/A	<i>Negligible</i>
	Shopping Facilities / <i>town centre health</i>	<i>Minor</i> Beneficial	N/A	N/A	<i>Minor</i> Beneficial
Water Resources	Fluvial Flood Risk	Negligible (not significant)	N/A	N/A	N/A
	Surface water	Negligible (not significant)	CEMP	N/A	N/A
	Waste water drainage /Foul drainage	Negligible (not significant)	N/A	N/A	N/A
	Water Supply	Negligible (not significant)	N/A	N/A	N/A
	Groundwater	Negligible (not significant)	N/A	N/A	N/A
Ground Conditions	Human Health - site users	Slight adverse	Embedded through decontamination if necessary prior to construction.	N/A	Negligible
	Ground water - contamination	Negligible	As above	N/A	Negligible
	Ecological systems	Slight adverse	As above	N/A	Negligible
	Damage to built environment - contamination	Negligible	As Above	N/A	Negligible
	Site Users - land stability	Moderate adverse	As above	N/A	Slight adverse
Transportation	Community Severance	Negligible	Framework Travel Plan as standard	N/A	Negligible
	Driver and Pedestrian Delay	Negligible	Framework Travel Plan as standard	N/A	Negligible



TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
	Accidents and Safety	Negligible	Framework Travel Plan as standard	N/A	Negligible
	Fear and Intimidation	Negligible	Framework Travel Plan as standard	N/A	Negligible
Ecology & Conservation	Statutory Sites - Medway Estuary and Marshes SPA/SSSI/Ramsar -recreational pressures	Major adverse (significant)	SAMMS, on-site recreation and off site provision		Negligible
	Other statutory sites - -recreational pressure	Minor adverse	Refer to paras 15.116 of ES		Indiscernible
	Orchard (non commercial, i.e. new planting as part of scheme of higher ecological value)	Minor adverse	Replanting to create betterment of habitat		Minor beneficial
	Hedgerows, scattered trees	Negligible	Refer to ES paras 15.122	Replacement and additional planting	Minor beneficial
	Semi-improved grassland	Negligible	Areas replanted and managed to enhance habitat, with more detail provided in a LEMP.		Minor beneficial
	Newly created Ponds and Suds	Negligible	Creation of new habitat as part of Development. More detail provided in a LEMP.	Overall habitat enhancement post-development.	Minor beneficial
	Foraging and commuting bats	Minor adverse	Refer to ES para 15.119-122. Management implemented to enhance habitat, with more detail provided in a LEMP.	Overall habitat enhancement post-development.	Indiscernible
	Reptiles	Minor adverse	Refer to ES Technical Appendix 15.5. Sensitive management implemented to enhance habitat, with more detail provided in a LEMP.	Overall habitat enhancement post-development.	Indiscernible

TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
	Badgers - net loss of foraging habitat	Minor adverse	Refer to ES Technical Appendix 15.3.		Indiscernible
	Breeding Birds - increase in nesting habitat	Minor adverse	Refer to ES Technical Appendix 15.4		Minor beneficial
Landscape	<i>Lower Rainham/Lower Twydall Fruit Belt LCA</i>	<i>Moderate adverse</i>	<i>Range of embedded landscape mitigation measures, including landscape buffers, tree planting and implementation of new areas of community orchards and village green.</i>		<i>Moderate adverse</i>
	<i>(Lower Rainham farmland LCA)</i>	<i>Minor adverse</i>	<i>Embedded landscape mitigation measures.</i>		<i>Minor adverse</i>
	<i>Medway Shoreline &amp; Marshes, Riverside Country Park LLCA</i>	<i>Minor adverse</i>	<i>As above</i>		<i>Minor adverse</i>
	<i>Site Features</i>	<i>Major adverse (localised)</i>	<i>As above</i>		<i>Moderate adverse</i>
	<i>Users of Northern Shore</i>	<i>Minor adverse</i>	<i>Landscape buffer planting and trees throughout the development</i>		<i>Neutral</i>
	<i>Users south Motney Hill</i>	<i>Moderate / Minor adverse</i>	<i>As above</i>		<i>Minor adverse</i>
	<i>Users north of Lower Rainham</i>	<i>Minor adverse</i>	<i>As above</i>		<i>Neutral</i>
	<i>Users of Lower Rainham Road</i>	<i>Minor adverse</i>	<i>As above</i>		<i>Minor adverse</i>

TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
	<i>Users Horrid Hill</i>	<i>Moderate adverse</i>	<i>As above</i>		<i>Minor adverse</i>
	<i>Users Lower Bloor Lane</i>	<i>Minor/ Moderate adverse</i>	<i>As above</i>		<i>Minor adverse</i>
	<i>Users Lower Twydall Lane</i>	<i>Minor adverse</i>	<i>As above</i>		<i>Minor adverse</i>
	<i>Users of Bridleway</i>	<i>Minor beneficial</i>	<i>As above</i>		<i>Minor/ Moderate Beneficial</i>
	<i>Users of Pump Lane</i>	<i>Moderate adverse</i>	<i>As above</i>		<i>Minor/ Moderate adverse</i>
	<i>Users of trains passing Site</i>	<i>Minor/ Moderate adverse</i>	<i>As above</i>		<i>Minor adverse</i>
	<i>Residents of Twydall south of railway</i>	<i>Moderate adverse</i>	<i>As above</i>		<i>Minor/ Moderate adverse</i>
	<i>Residents on Pump Lane</i>	<i>Moderate/ Major adverse (localised)</i>	<i>As above</i>		<i>Moderate adverse</i>
	<i>Residents on Lower Bloor Lane</i>	<i>Minor/ Moderate adverse</i>	<i>As above</i>		<i>Minor adverse</i>
	<i>Residents Lower Rainham</i>	<i>Minor/ Moderate adverse</i>	<i>As above</i>		<i>Minor adverse</i>
	<i>Residents Lower Twydall</i>	<i>Minor adverse</i>	<i>As above</i>		<i>Negligible</i>
Air Quality	Existing sensitive receptors	Negligible	Refer to chapter 12 para 12.176 in ES	N/A	Negligible

TOPIC	IMPACT	SIGNIFICANCE	MITIGATION	RESIDUAL IMPACT	SIGNIFICANCE
	On Proposed residential receptors	Negligible	As above	N/A	Negligible
	On Ecological receptors	Unknown	Refer to para 12.176 of ES and the separate IHRA (albeit not specifically required in respect of international/European designated sites)		Negligible
Archaeology and Heritage	Indirect impact on setting of Listed buildings and conservation areas	<i>Minor for the listed buildings.</i>	<i>Considerable strengthening and additional</i> boundary planting and on site planting.	Indirect impact on setting listed buildings and conservation areas reducing over time as planting matures	<i>Minor for listed buildings.</i>
		<i>Moderate adverse</i> Lower Rainham CA			<i>Moderate adverse</i> Lower Rainham CA
		<i>Minor adverse</i> Lower Twydall CA.			<i>Minor adverse</i> Lower Twydall CA

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FIGURE NTS1 - SITE LOCATION PLAN



