Council – Supplementary agenda No.1 – Appendix 3

A meeting of the Council will be held on:

Date: 26 June 2025

Time: 7.00pm

Venue: St George's Centre, Pembroke, Chatham Maritime, Chatham ME4 4UH

Items

5 Publication of Medway Local Plan (Regulation 19) **(Pages 3 - 832)**

Please find enclosed Appendix 3 to the report.

For further information please contact Wayne Hemingway, Head of Democratic Services on Telephone: 01634 332509 or Email: democratic.services@medway.gov.uk

Date: 18 June 2025

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Sustainability Appraisal of the Medway Local Plan

Volume 1 of 3: Non-technical summary

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June 2025

LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Medway Local Plan

Volume 1 of 3: Non-Technical Summary of the Regulation 19 SA

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1 Introduction

The purpose of this report

N1. Lepus Consulting Ltd (Lepus) has been instructed by Medway Council to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA), for the Medway Local Plan (MLP) 2026/27-2040/41.

N2. The Regulation 19 SA Report has been prepared to present details of the SA process to date and inform Medway Council's preparation of the MLP. This document comprises a Non-Technical Summary (NTS) of the Regulation 19 SA, which presents an assessment of the likely sustainability impacts of proposals set out in the Plan.

N3. This NTS document comprises **Volume 1** of the SA; it is accompanied by **Volume 2**: The Main SA Report and **Volume 3**: Appendices to the main SA Report.

The Medway Local Plan

N4. The Medway Local Plan (MLP) sets out the overall strategy for development in Medway Council for the Plan period 2026/27 to 2040/41, providing a framework for where and how new development can take place.

N5. The MLP aims to strengthen Medway's position in the economy and culture of the region, connected to its surrounding coast and countryside, with a thriving economy, where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets.

N6. The strategic objectives of the Plan are built around the components of economic, social and environmental sustainability, with a cross-cutting aim for infrastructure investment and the development of an intrinsic value which boosts pride in the local area.

What is Sustainability Appraisal and Strategic Environmental Assessment?

N7. The Planning and Compulsory Purchase Act[1] requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations[2] (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including development plan documents, to ensure that environmental issues are fully integrated and addressed during decision-making.

N8. SA is the process of informing and influencing the preparation of a local plan or development plan document to optimise its sustainability. SA considers the social, economic and environmental performance of the plan. The SA (and SEA) can help to ensure that proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests

[1] Planning and Compulsory Purchase Act 2004. Available at: www.legislation.gov.uk/ukpga/2004/5/contents [Date accessed: 10/01/25]

[2] The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: www.legislation.gov.uk/uksi/2004/1633/contents/made [Date accessed: 10/01/25]

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of soundness have been met. SA should be applied as an iterative process informing the plan throughout its development.

N9. Sustainability can be defined as "*meeting the needs of the present generation without compromising the ability of future generations to meet their own needs*"[3]. To be sustainable, development requires the integration of the needs of society, the economy and the environment (see **Figure N.1.1**).

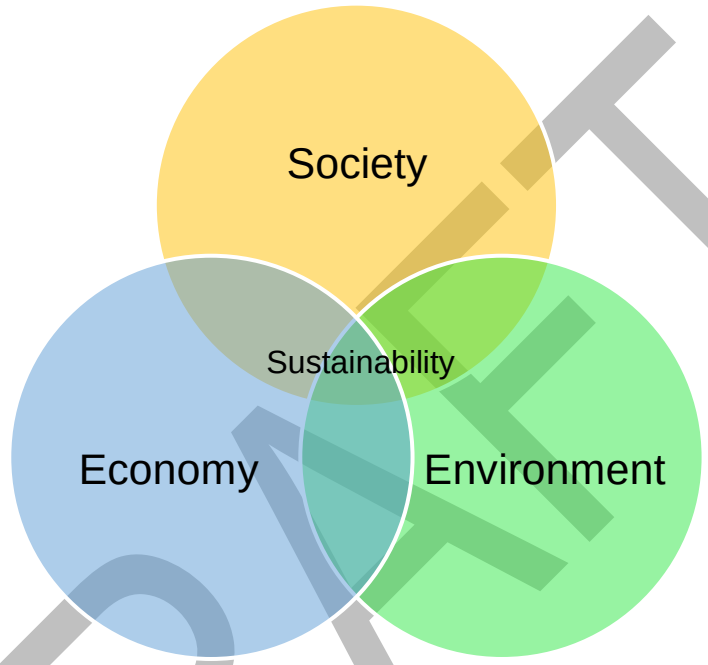

Figure N.1.1: *Sustainable development*

N10. The MLP is at the plan-making stage Regulation 19, known as 'Publication' in the Local Plan Regulations 2012[4], as shown in Stage C of **Figure N.1.2**.

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[3] Brundtland (1987) Report of the World Commission on Environment and Development: Our Common Future. Available at: http://www.un-documents.net/our-common-future.pdf [Date accessed: 09/01/25]

[4] The Town and Country Planning (Local Planning) (England) Regulations 2012. SI 767

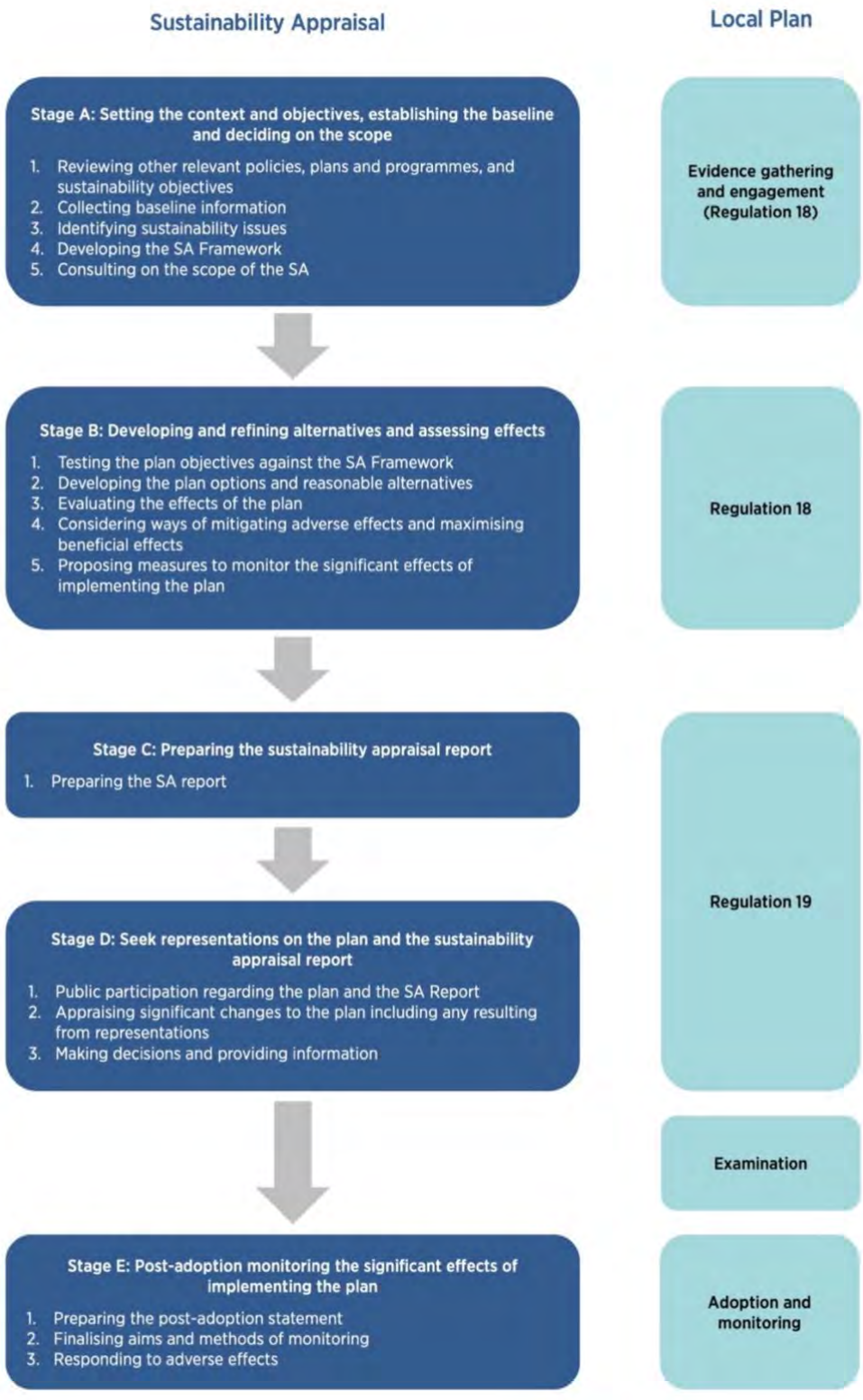

Figure N.1.2: *Sustainability Appraisal and the Local Plan process*

Medway Local Plan Area

N11. **Figure N.1.3** shows the Medway Council boundary which defines the Plan area for the MLP. Within this area are the five primary towns of Rochester, Chatham, Gillingham, Strood, and Rainham, each boasting unique characteristics and significant heritage features. These towns host the majority of Medway's services, including three universities. Additionally, the authority area encompasses a network of smaller towns and villages.

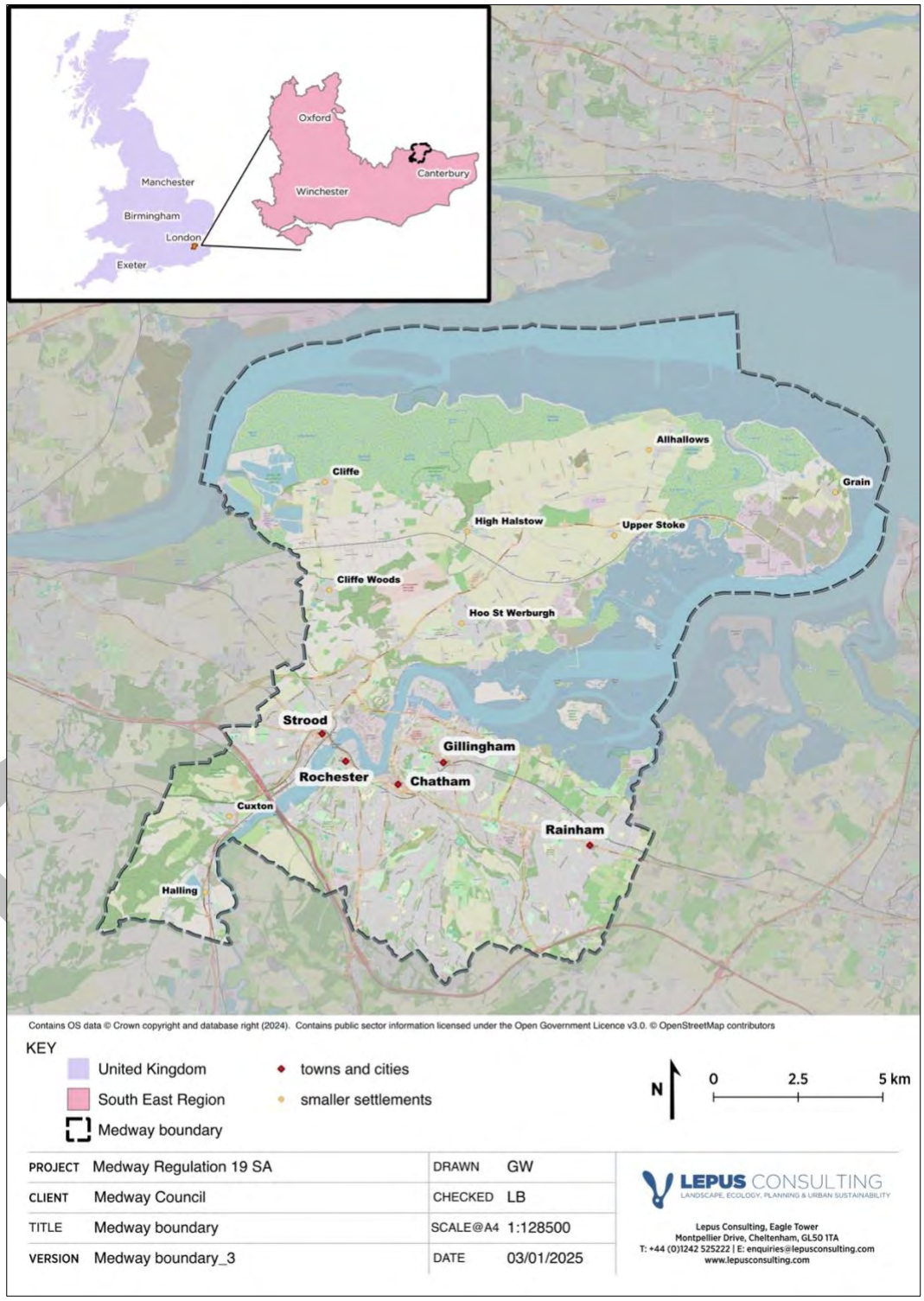

Figure N.1.3: *Medway Local Plan area*

The SA process alongside the Medway Local Plan

N12. **Figure N.1.4** provides an overview of the stages that have been undertaken during the preparation of the MLP and accompanying SA outputs, summarising the purpose and content of each.

N13. Each stage included consultation with the statutory bodies for SA/SEA (Historic England, Natural England and the Environment Agency) as well as public consultation with other stakeholders and interested parties. Comments received were considered during the preparation of the SA outputs (see **Appendix C**).

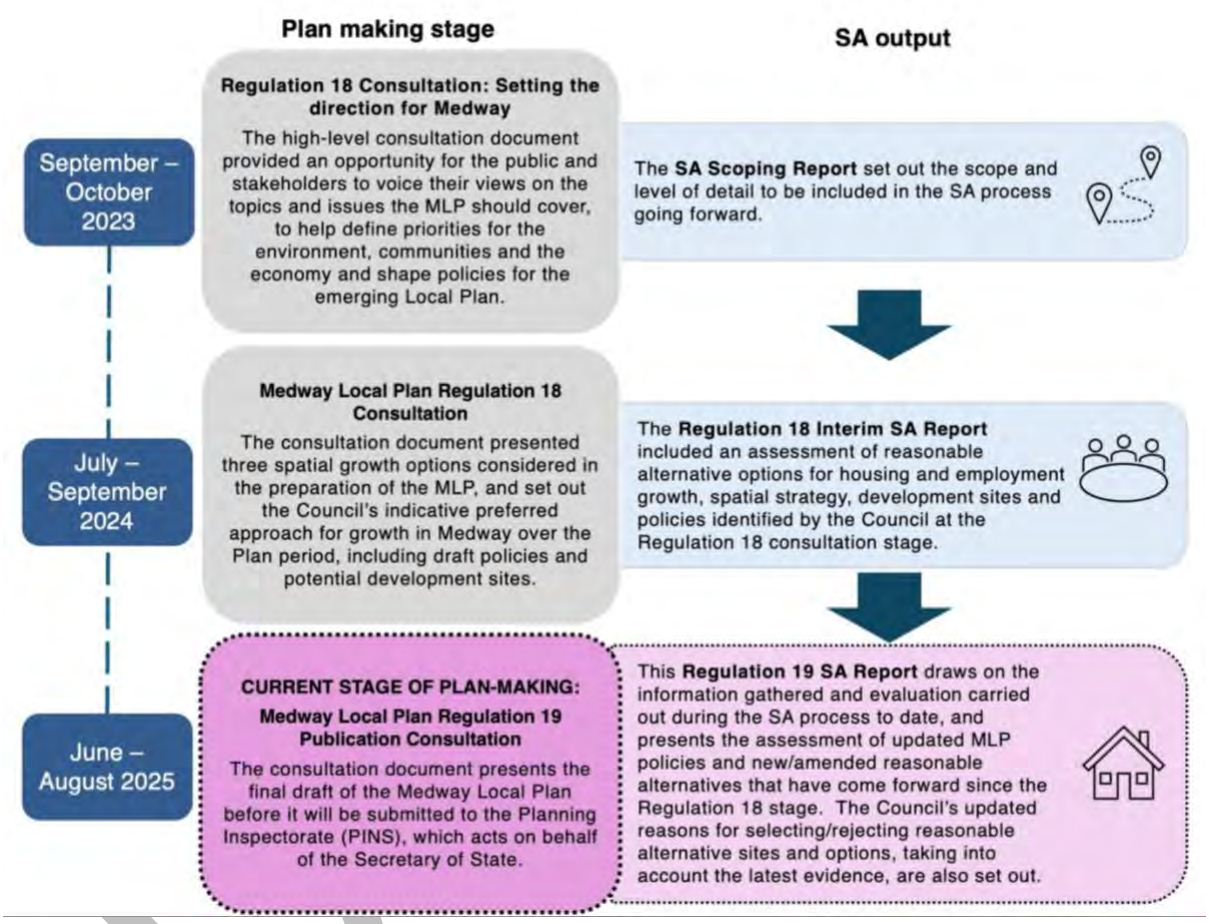

Figure N.1.4: *The MLP and SA process so far*

2 Purpose and content of the Regulation 19 SA Report

About the Regulation 19 SA Report

N14. The Regulation 19 SA Report presents the overall findings of the SA of the MLP, which is composed principally of 88 strategic, thematic and DM policies and 14 site allocation policies. The SA Report summarises the SA process to date and has been prepared to help inform the examination stage of the MLP.

N15. The purpose of the SA of the MLP is to:

- Identify, describe and evaluate the likely sustainability effects of the MLP proposals and their reasonable alternatives;
- Inform the Council's decision making and preparation of the MLP; and
- Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA.

Structure of the Regulation 19 SA Report

N16. The SA of the MLP is presented in three volumes:

N17. **Volume 1**: **Non-Technical Summary** (NTS) (this document) provides a summary of the Regulation 19 SA.

N18. **Volume 2: Main SA Report** contains the following chapters:

- **Chapter 1** presents an introduction to this report.
- **Chapter 2** sets out information about the MLP and the SA process to date.
- **Chapter 3** presents the evolution of the environment without the MLP.
- **Chapter 4** sets out the SA methodology.
- **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
- **Chapter 6** presents details on the preferred approach as set out in the MLP.
- **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic.
- **Chapter 16** summarises the cumulative effects identified.
- **Chapter 17** sets out a range of monitoring recommendations for the MLP.
- **Chapter 18** summarises ways in which the SA has influenced the MLP throughout the plan making process, including through recommendations made in the SA.
- **Chapter 19** outlines the conclusions, residual effects and next steps.

N19. **Volume 3: Appendices** provides further contextual information as follows:

- **Appendix A** presents a review of other relevant policies, plans and programmes (PPPs).
- **Appendix B** presents the SA Framework.

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- **Appendix C** summarises the consultation responses received during each stage of the SA process.
- **Appendix D** presents the assessment of two additional growth options (overall quantum of growth) identified since the Regulation 18 stage.
- **Appendix E** sets out the topic-specific methodology and assumptions applied in the evaluation of reasonable alternative sites.
- **Appendix F** presents the assessment of reasonable alternative strategic development sites.
- **Appendix G** presents the assessment of reasonable alternative non-strategic development sites.
- **Appendix H** presents the assessment of MLP strategic, thematic and development management (DM) policies.
- **Appendix I** considers the mitigating influence of MLP policies on reasonable alternative development sites and presents the post-mitigation site assessments.
- **Appendix J** sets out the Council's outline reasons for selection or rejection of each reasonable alternative site considered throughout the SA process.
- **Appendix K** presents the assessment of MLP site allocation policies.

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3 Baseline and key sustainability issues for the MLP area

Overview

N20. There are a number of plans, policies and programmes (PPPs) that set out the environmental protection objectives which proposals within the MLP should adhere to (see **Appendix A**). In accordance with the SEA Regulations, the SA process needs to consider these PPPs, as well as existing environmental problems and the baseline characteristics of the local area, in order to determine the likely effects of the local plan itself.

N21. **Volume 2** (the main Regulation 19 SA Report) includes information relating to the baseline and key issues for Medway, drawing on information gathered during the Scoping stage, relating to the following sustainability topics (which incorporate the topics identified in Schedule 2 of the SEA Regulations[5]):

- Air;
- Biodiversity, flora and fauna;
- Climatic factors;
- Cultural heritage;
- Human health;
- Landscape;
- Population and material assets; and
- Soil and water resources.

N22. The SEA Regulations also requires the Environmental Report to present *"information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme".*

N23. Without the MLP, no new plan-led development would occur within the Medway area over and above that which is currently proposed in the adopted Medway Plan 2003[6]. In this scenario, there is more uncertainty in terms of the nature and scale of development that may come forward. In a 'no plan' scenario, other PPPs will continue to be a material consideration in planning decisions and legislative protection will continue to be in place.

N24. An overview of each topic, including the key issues affecting Medway and the likely evolution of the baseline within Medway in the absence of the MLP, taking into account information gathered at the scoping stage as well as more up-to-date data and statistics is provided in **Table N.3.1**.

Table N.3.1: *Summary of key issues in Medway and the likely evolution of the environment without the MLP*

[5] Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including "*issues such as (a) biodiversity, (b) population,(c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)*."

[6] Medway Council. Medway Local Plan 2003. Available at: www.medway.gov.uk/downloads/file/2400/medway_local_plan_2003 [Date accessed: 10/01/25]

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Theme	Key issues	Likely evolution without the MLP
Air	• The principal pollutant affecting air quality in Medway is nitrogen dioxide (NO_2), mostly originating from road traffic - reduction in NO_2 emissions is required. • There are areas of poor air quality within Medway including the strategic road network and AQMAs, and proximity of residential development to pollutants. • The rate of mortality attributable to particulate matter air pollution in Medway is higher than England's average.	• Primary sources of air pollution in the UK include road transport, industry, imports and agriculture. These sources will not be expected to change. • Congestion issues around Rochester, Chatham, Rainham, Strood and Gillingham, and on the A228 near Hoo, could potentially be exacerbated due to a rising population. Medway is also affected by development outside the boundary, for example, implications of the proposed Lower Thames Crossing, development in neighbouring authority areas, and key junctions in the wider area. Traffic and congestion can have implications for air quality, human health and wildlife, especially those within 200m of main roads. • There are four AQMAs within and around Medway and the principal pollutant affecting air quality is nitrogen dioxide (NO_2), mostly sourced from road traffic. Continuing to monitor air quality, especially within AQMAs, and implementation of measures outlined in Air Quality Action Plans will ensure that objectives are in place to decrease exceedances over time. • National trends suggest there is an increasing uptake of lower emission vehicle types, such as electric cars, which will be likely to help limit road transport associated emissions in the MLP area and will be likely to further improve air quality.
Biodiversity, Fauna and Flora	• Medway has a rich natural environment including expansive areas of nature conservation habitats which support rare and important species. • Medway's environmental designations and countryside (including agricultural land) is at threat of being compromised to meet housing demand. • It is essential that the Green Infrastructure provision and its accessibility is improved, conserved and enhanced to support the envisaged increase in population and accompanying housing provision.	• Sites designated for their national and international biodiversity and/or geodiversity value will continue to benefit from legislative protection. • Long-term prospects for protecting and enhancing the wealth of habitats and species in the area, and for further developing the existing Green Infrastructure network, would be reduced without a strong policy framework being established in the Plan. • It is uncertain if development will be placed near locally designated sites without the introduction of the Plan. Without the Plan, it may be difficult to help ensure that development is not of a type, scale and location that could potentially have a major adverse impact on either a biodiversity or geodiversity designation (of international, national or local significance) or on the

Theme	Key issues	Likely evolution without the MLP
	• **Key issues relating to the Birds and Habitats Directives:** • Likely significant effects (LSEs) have been identified in the Habitats Regulations Assessment (HRA) screening process for the MLP: air quality, hydrology, recreational pressure and urbanisation impacts at several designations including the Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar, and North Downs Woodlands SAC.	functioning ecological network of the Plan area and the various essential ecosystem services this provides.
Climatic Factors	• Medway is a coastal authority and therefore at risk of flooding and sea level rise. • Increased number of vehicles on the road will exacerbate congestion, which is likely to be the major source of greenhouse gas emissions within Medway. • GI should be enhanced and expanded to maximise ecosystem services and climate resilience. • New development needs to incorporate energy efficiency measures and climate change adaptive features in order to respond to predicted levels of climate change.	• Carbon dioxide (CO_2) emissions in the transport sector may be likely to rise in line with local trends. An increasing uptake of electric vehicles, a trend seen across the UK, may help to alleviate these issues. • The risk of flooding will be likely to increase over time due to the changing climate, increasing the occurrence of extreme weather events. • The risk of surface water flooding will depend on the size, nature and extent of non-porous built surface cover in the future, and the effectiveness of the existing drainage system. • Total carbon emissions are expected to continue to decrease over the longer term as renewable energy becomes an increasingly competitive force in the UK energy market. • Technological advances, which may include renewable energies, electric vehicles, and efficient electricity supplies, will be expected to occur. • The lack of a planned growth strategy could lead to increased carbon emissions as development may be less likely to be in sustainable locations.
Cultural Heritage	• Medway's rich heritage is at threat of being compromised to meet housing demand. • There are numerous historic buildings that are listed. • Medway includes heritage assets identified as heritage at risk. • Archaeological remains, both seen, and unseen have the potential to be affected by new development areas.	• National and local guidance seeks to protect designated assets and their settings such as Listed Buildings, Conservation Areas, Scheduled Monuments, and Registered Parks and Gardens. • The Heritage at Risk Register will continue to be managed by Historic England who will continue to work with stakeholders to protect these assets.

Theme	Key issues	Likely evolution without the MLP
		• Further heritage assets are likely to be identified in the future, with or without the MLP. • It is uncertain if connectivity with places, local distinctiveness and culture would be emphasised and protected in the absence of the MLP as it is anticipated that the MLP will require a Heritage Statement and/or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.
Human Health	• The increasing population in Medway will place pressure on the capacity of health infrastructure and leisure facilities without careful planning and integration of new infrastructure, especially in light of Medway's existing high patient-to-GP ratio. • The life expectancy of men and women is anticipated to rise over time, in line with national trends, leading to a greater proportion of older residents with specific needs for housing and services. • Residents in Medway have a slightly higher than average proportion of overweight adults and lower average life expectancy in comparison to the South East average and national average.	• The population across Medway is expected to continue to increase. This is likely to place greater pressure on the capacity of key services and amenities, including health and leisure facilities and housing. • The life expectancy of men and women is anticipated to rise over time, leading to an increasingly aging population. • Some residents will continue to need to travel relatively far, likely by driving, to reach important health facilities and services. • Dependent on behavioral patterns in society and the future policy approach to the concentration of late-night activities, the spatial patterns of higher crime in the town centres seem likely to continue. • There could potentially be a rise in homelessness due to an unmet housing need. • Noise pollution from Rochester Airport and existing and new main roads is likely to remain a long-term issue.
Landscape	• Development has the potential to impact on the Kent Downs National Landscape. • There is limited land available for development which places increasing pressure on natural assets due to the projected population increase. • Development should maintain important aspects of Medway's varied landscapes, including historic parks and gardens and areas of high landscape value. • Development should have regard to the findings of the published Landscape Character Assessment.	• The London Green Belt will continue to benefit from legislative protection. • The extent to which development will seek to conserve and enhance the character of local landscape and townscapes is uncertain. In the absence of MLP-led development, there could potentially be a rise in the quantity of new development which discords with the local character by altering the style and scale of development.

Theme	Key issues	Likely evolution without the MLP
	• Change to and impacts upon the views from sensitive landscapes, local residents and the PRoW network. • Alterations to the urban/rural fringe and increased risk of coalescence between settlements. • Increasing demand for housing results in increased pressure on landscapes to accommodate new growth.	
Population and Material Assets	• The increasing population within the Plan area will inevitably create more waste and pollution • It is important to ensure waste management accords with the waste hierarchy and reduces the overall quantity of waste • Waste facilities will need to be provided to cater for a growing population, prevent fly tipping and increase recycling rates • Need to provide suitable housing for a growing elderly population • Many pockets of economic/income deprivation, with some suffering severe, multiple deprivation • Public transport and sustainable travel options are less widespread in more rural areas of the Plan area. The distance and accessibility to key services and amenities, as well as employment opportunities, should be considered when determining where to locate new development. • Travel time and sustainable accessibility to educational facilities including primary schools, secondary schools and further/higher level educational facilities varies across the Plan area.	• The population of Medway is expected to continue to increase, which will be likely to result in secondary effects. Some of these secondary effects could include effects on health, education and social inequalities due to poorer accommodation and the potential for fewer sustainable travel choices being available. • Energy consumption in all sectors is expected to increase. • There will be less planning control over the location of future development sites, with potential for planning applications for new homes being allowed in unsustainable locations and/or without necessary supporting infrastructure. • There is the potential for the required infrastructure to support further growth not being delivered and for more dispersed patterns of development which could occur without a plan, both of which could increase the proportion of the population with poor access to services.
Soil	• The majority of land within the plan area is high quality agricultural land including ALC Grade 1 which may be under threat from new development. • The development of sites could cause soil erosion and soil loss.	• Soil is a non-renewable resource that will be likely to continue to be lost. • Rates of soil erosion and loss of soil fertility will be likely to continue to rise due to the impacts of agriculture and climate change.

Theme	Key issues	Likely evolution without the MLP
Water	• The Plan area contains SPZ1, SPZ2 and SPZ3 to the south of the plan area, supporting groundwater resources, the quality and quantity of which should be conserved. • There are a number of important water resources and marine habitats within and around Medway which are sensitive to pollutants. • The River Medway is a valued asset that is underused. However, development and/or use of the river must not compromise the marine life and ecosystems. • Medway lies within an area of water stress, where there is a risk of drought with implications for both human and ecosystem heath.	• Without the MLP, there could potentially be less control over the location and scale of new developments with potential to result in over-capacity issues at wastewater treatment works (either cumulatively or individually). • In the absence of MLP-led development, the efficiency and sustainability of water consumption may be unlikely to improve owing to the likely increase in population and associated water demand, depending on the nature of any future changes to national regulations, such as the Building Regulations and any emerging policy / regulations relating to water neutrality. • Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the Thames and south east RBMPs, WRMP and CAMS in line with the EU Water Framework Directive.

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4 SA methodology

The SA Framework

N25. Taking into consideration the key issues discussed in **NTS Chapter 3** above, an SA Framework was established which includes SA Objectives, decision-making criteria and indicators. The SA Framework provides a way in which sustainability effects can be described, analysed and compared, and for monitoring the implementation of the Plan.

Table N.4.1: *Summary of the SA Objectives*

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	**Climate Change Mitigation:** Minimise Medway's contribution to climate change.	Climatic factors
2	**Climate Change Adaptation:** Plan for the anticipated impacts of climate change.	Climatic factors, soil, water
3	**Biodiversity and Geodiversity:** Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of Medway.	Biodiversity, flora and fauna
4	**Landscape and Townscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	Landscape and cultural heritage
5	**Pollution and Waste:** Reduce waste generation, increase the reuse and recycling of materials whilst minimising the extent and impacts of water, air and noise pollution.	Air, water, soil, human health and material assets
6	**Natural Resources:** Protect, enhance and ensure the efficient use of Medway land, soils and water.	Soil, water and material assets
7	**Housing:** Provide a range of housing to meet the needs of the community.	Population
8	**Health and Wellbeing:** Safeguard and improve the physical and mental health of residents.	Population and human health
9	**Cultural Heritage:** Conserve, enhance and manage sites, features and areas of historic and cultural importance.	Cultural heritage
10	**Transport and Accessibility:** Improve the choice and efficiency of sustainable transport in Medway and reduce the need to travel.	Climatic factors and material assets
11	**Education:** Improve education, skills and qualifications in Medway.	Population
12	**Economy and Employment:** Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	Population and material assets

N26. The full SA Framework used throughout the SA process including indicators is presented in **Appendix B**, with a summary of the 14 SA Objectives shown in **Table N.4.1**. It should be noted that the order of SA Objectives does not infer any prioritisation.

Significant effects

N27. A single value from **Table N.4.2** has been allocated to each SA Objective for each reasonable alternative, option or policy evaluated in the SA process. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all SA assessments.

N28. The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: "*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

Table N.4.2: *Guide for likely significant effects*

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a development proposal will be likely to: Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; Cause a very high-quality receptor to be permanently diminished; Be unable to be entirely mitigated; Be discordant with the existing setting; and/or Contribute to a cumulative significant effect.
Minor Negative -	The size, nature and location of development proposals will be likely to: Not quite fit into the existing location or with existing receptor qualities; and/or Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is uncertain whether impacts will be positive or adverse.
Minor Positive +	The size, nature and location of a development proposal will be likely to: Improve undesignated yet recognised receptor qualities at the local scale; Fit into, or with, the existing location and existing receptor qualities; and/or Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal will be likely to: Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; Restore valued receptors which were degraded through previous uses; and/or Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

N29. Limitations, assumptions and topic-specific methodologies applied in the SA are discussed in further detail within **Chapter 4** of the Regulation 19 SA Report (**Volume 2**) and **Appendix E** (**Volume 3**).'

5 Reasonable alternatives

Preface

N30. The SEA Regulations state that when preparing an environmental report, the local plan making process must identify, describe and evaluate reasonable alternatives.

N31. There is no specific definition of a 'reasonable alternative'. Medway Council has identified reasonable alternatives for the MLP at different stages of the plan making process, including different types of reasonable alternatives, including options to meet the required amount of housing, employment and Gypsy and Traveller growth, as well as spatial options and reasonable alternative development sites.

N32. The SA has assessed all options and reasonable alternatives on a comparable basis against the SA Framework to identify likely sustainability impacts, and it is the Council's role to use the SA findings, alongside other evidence base material, to decide which options to 'select' for allocation in the MLP and which to 'reject' from further consideration.

N33. In the case of the MLP, all reasonable alternatives have been identified and described by the Council's plan makers. **Figure N.5.1** below outlines the definitions for the different types of reasonable alternatives assessed throughout the SA process.

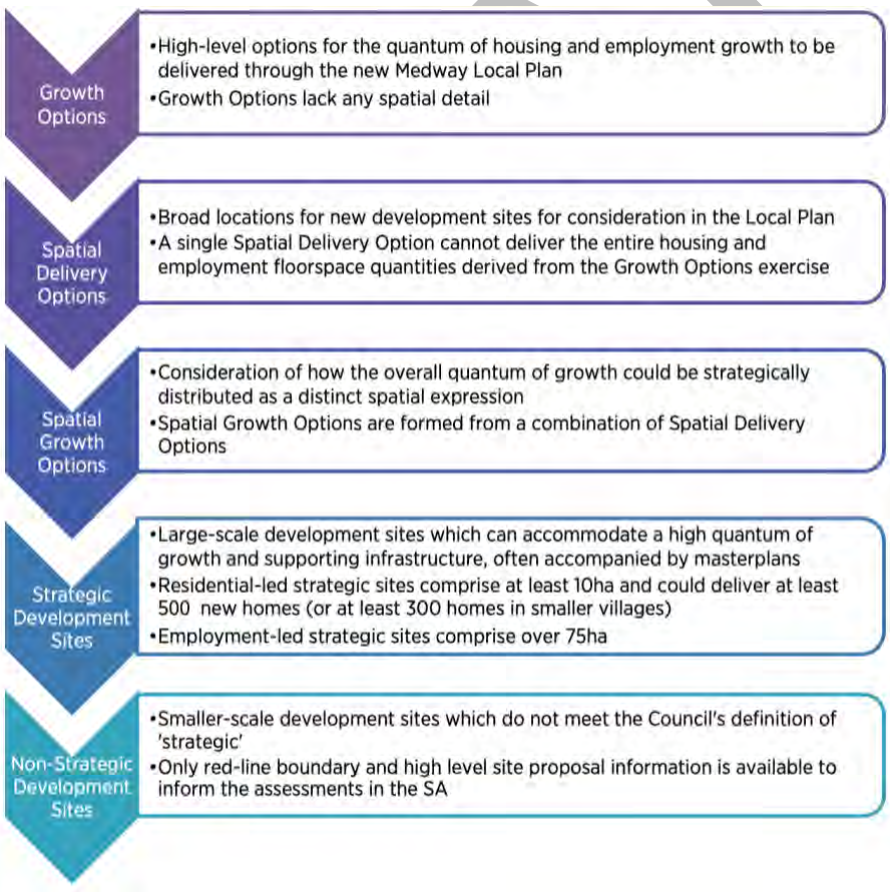

Figure N.5.1: *Definitions for the different types of reasonable alternatives assessed in the SA process*

N34. **Figure N.5.2** summarises the reasonable alternatives considered throughout the SA process, and where these alternatives have been identified, described and evaluated.

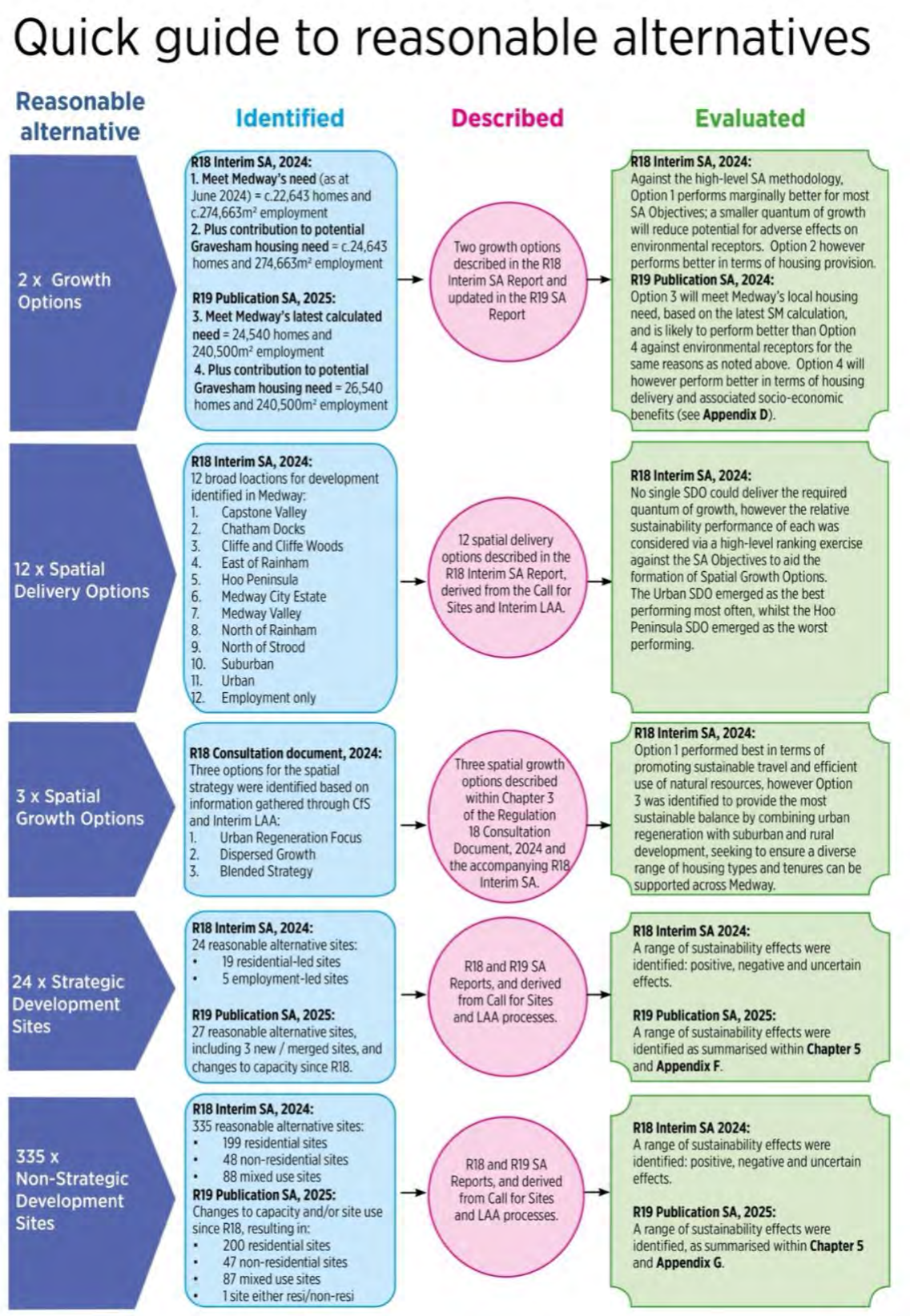

Figure N.5.2: *The identification, description and evaluation of reasonable alternatives considered throughout the plan-making process*

Growth options

N35. Paragraph 62 of the NPPF[7] states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method outlined in PPG[8]. The NPPF also states "*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*".

N36. Medway Council identified two reasonable alternatives for the quantum of housing and employment growth to be delivered through the emerging Local Plan (see **Table N.5.1**). These options were based on the latest evidenced needs for the Plan area at the time of writing, and the potential unmet housing needs of the neighbouring authority of Gravesham, noting that these unmet needs were not yet confirmed given Gravesham Borough Council's in-progress Local Plan Partial Review[9].

N37. The assessment of the two growth options within **Table N.5.1** are presented in full within the Regulation 18 Interim SA Report (2024)[10].

***Table N.5.1**: Growth options identified by Medway Council at the Regulation 18 stage*

Growth option	Description of growth option
Option 1	Meet Medway's Local Housing Need and Initial Objective Assessment of Employment Land Need (based on evidence at Regulation 18 stage). **Approximately 22,643 homes and 274,663m^2 employment land.**
Option 2	As for Option 1, plus meeting Gravesham's Unmet Housing Need. Initial consultation and duty to cooperate meetings with Gravesham Borough Council have identified a potential unmet housing need of 2,000 homes. **Approximately 24,643 homes and 274,663m^2 employment land.**

N38. Opting for a larger quantum of development tends to result in more significant negative impacts on environmental sustainability objectives. Opting for lower growth could help to reduce pressure on transport systems and social infrastructure. Considering these factors, Option 1 was identified as the best performing option of the two options against the majority of SA Objectives. Conversely, Option 2 was identified as performing stronger against SA Objective 7 (housing) due to its proposal to deliver approximately 2,000 dwellings to address Gravesham Borough's unmet housing need, providing greater benefits regarding affordable housing and the provision of a suitable mix of housing.

N39. The Regulation 18 consultation closed in September 2024. A new version of the NPPF was published in December 2024, alongside updated PPG. New housing figures were

[7] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 31/12/24]

[8] DLUHC and MHCLG (2024) Planning Practice Guidance. Available at: www.gov.uk/guidance/housing-and-economic-development-needs-assessments [Date accessed: 31/12/24]

[9] Gravesham Borough Council (2024) Planning Policy News: Gravesham Local Plan Partial Review. Available at: https://www.gravesham.gov.uk/planning-regeneration/consultations-news/3 [Date accessed: 29/04/25]

[10] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 28/11/24]

published, derived through the Standard Method, that sought to meet the government's aspirational target of building 1.5 million homes during this parliamentary term.

N40. The latest Standard Method calculation for Medway is 1,636 dwellings per annum[11]. Across the proposed 15-year Plan period, this equates to a total housing need of 24,540 dwellings. In terms of employment needs, the 2025 Employment Land Needs Assessment (ELNA) identified a need for a minimum of 204,000 sqm of industrial floorspace and 36,500 sqm of office floorspace (totalling 240,500 sqm).

N41. **Table N.5.2** presents two further reasonable alternative growth options which have been identified by Medway Council in response to the change in Standard Method housing number: Options 3 and 4. These options effectively update Options 1 and 2 as described above so that the latest calculated housing and employment need figures can be evaluated in the SA process. The full evaluation of these options can be found in **Appendix D**.

***Table N.5.2**: Growth options identified by Medway Council at the Regulation 19 stage*

Growth option	Description of growth option
Option 3	Meet Medway's Local Housing Need (based on latest standard method calculation) and Objective Assessment of Employment Land Need. **Approximately 24,540 homes and 240,500m^2 employment land.**
Option 4	As for Option 3, plus meeting Gravesham's Unmet Housing Need. Initial consultation and duty to cooperate meetings with Gravesham Borough Council have identified a potential unmet housing need of 2,000 homes. **Approximately 26,540 homes and 240,500m^2 employment land.**

Comment from Council:
Gravesham Borough Council has notified Medway Council of an estimated unmet housing need of 2,000 homes through responses to consultations and duty to cooperate meetings. Medway Council has requested further information from Gravesham Borough Council to demonstrate the unmet housing need. Medway Council has not received an assessment of land availability from Gravesham Borough Council, therefore Option 2 and Option 4 cannot be justified. This matter is set out in a Statement of Common Ground.

Option 1 and Option 3 have been shown to perform better compared to Option 2 and Option 4. Option 3 is aligned with the direct output from the Standard Method as a starting point to determine local housing need. Therefore, Option 3 forms the basis of Medway Council's spatial strategy.

Spatial delivery options

N42. Drawing on information gathered through Call for Sites exercises and the Interim Land Availability Assessment (LAA)[12] and sites promoted in response to the previous Regulation 18 consultation (2023), 12 'spatial delivery options' (SDOs) were identified by the Council.

[11] Turley (2025) The standard method of assessing housing need. Available at: https://www.turley.co.uk/sites/default/files/pdf/file/2025-05/turley_lpdf_-_revised_standard_method_analysis_may2025_0.pdf [Date accessed: 13/06/25]

[12] Medway Council (2023) Land Availability Assessment Interim Report, October 2023. Available at: https://www.medway.gov.uk/downloads/file/8413/medway_land_availability_assessment_september_2023 [Date accessed: 31/12/24]

The 12 SDOs were assessed within Appendix B of the Regulation 18 (2024) Interim SA Report[13].

N43. The SDOs were based on broad locations across Medway, apart from one which comprises sites for employment land uses only. The broad locations which form the SDOs cover a range of land use types, which could provide a mixture of sites including greenfield and rural development as well as opportunities for regeneration of brownfield land, in order to explore the relative benefits and challenges associated with growth in these areas across Medway.

N44. The 12 SDOs and the likely range of homes that could theoretically be delivered through each SDO are presented in **Table N.5.3.** **Figure N.5.3** presents a map of the indicative broad areas covered by each of the 12 SDOs.

***Table N.5.3**: Spatial delivery options identified by Medway Council*

Spatial delivery option	Minimum number of new homes	Maximum number of new homes
Capstone Valley	3,749	4,336
Chatham Docks	3,000	3,000
Cliffe and Cliffe Woods	2,079	2,406
East of Rainham	1,243	1,432
Hoo Peninsula	10,893	12,970
Medway City Estate	1,092	1,502
Medway Valley	1,264	1,457
North of Rainham	2,560	3,275
North of Strood	2,029	2,319
Suburban	495	779
Urban	7,719	8,542
Employment only	480ha of employment floorspace	480ha of employment floorspace

N45. **Table N.5.4** summarises the SA findings. The assessments are presented in full within Appendix B of the Regulation 18 (2024) Interim SA Report[14].

N46. No single SDO could deliver the required quantum of development and a combination of SDOs would be needed to form a spatial strategy and ensure a sustainable level of growth across Medway as a whole. Drawing on the assessment narrative and relative sustainability performance of the 12 SDOs against each SA Objective, the Urban SDO emerged as the best performing option the most often. The Suburban SDO and Chatham Docks SDO also performed relatively well, each ranking 1st against two SA Objectives. The worst performing SDO is the Hoo Peninsula, ranking the lowest against a number of SA Objectives, with potential adverse effects associated with the introduction of a large quantum of growth in small settlements and in proximity to sensitive ecological receptors.

[13] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 31/12/24]

[14] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 31/12/24]

Table N.5.4: *Impact matrix of the spatial delivery options (extracted from the Regulation 18 Interim SA Report)*

	1	2	3	4	5	6	7	8	9	10	11	12
Spatial Delivery Option	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
Capstone Valley	--	0	-	--	-	--	++	-	0	-	--	+
Chatham Docks	--	--	-	0	-	0	++	+	0	++	0	+
Cliffe and Cliffe Woods	-	0	--	-	-	--	+	--	0	--	-	+
East of Rainham	-	0	-	--	-	--	+	--	-	-	+	+
Employment	+/-	--	--	-	-	-	0	--	-	--	0	++
Hoo Peninsula	--	0	--	--	--	--	++	--	--	--	-	+
Medway City Estate	-	--	-	0	--	-	+	-	-	0	-	+
Medway Valley	-	-	--	--	--	--	+	--	-	0	--	+
North of Rainham	--	-	-	--	-	--	++	-	-	0	-	+
North of Strood	-	0	-	--	--	--	+	--	-	0	-	+
Suburban	-	0	-	-	-	0	+	0	0	+	+	+
Urban	--	--	-	0	--	0	++	++	--	++	++	+

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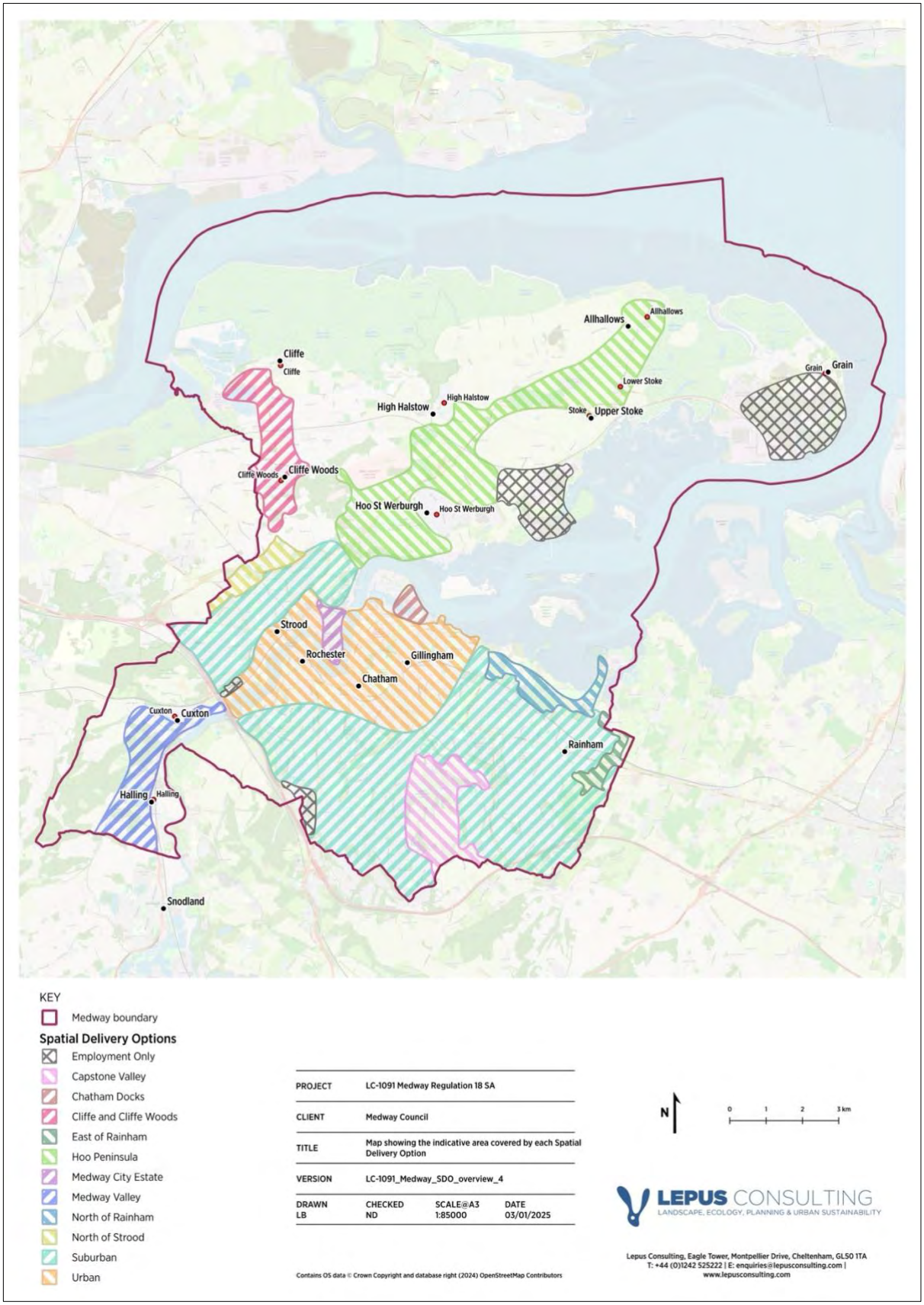

Figure N.5.3: *Map showing the indicative broad areas covered by each Spatial Delivery Option*

N47. A combination of SDOs will be required to form a spatial strategy. The Council has considered different combinations of SDOs which could form spatial growth options.

Spatial growth options

N48. The spatial strategy will direct future growth in Medway for the Plan period to 2040/41.

N49. Given Medway's geography and constraints, including environmental constraints on the Hoo Peninsula and transport constraints within the existing urban areas, the Council is limited in the number of different spatial approaches it can take to accommodate growth.

N50. Drawing on information gathered through Call for Sites exercises and the Interim LAA[15] and sites promoted in response to the previous Regulation 18 consultation (2023), three spatial growth options (which constitute reasonable alternative spatial strategies) have been identified by the Council and are summarised in **Table N.5.5**. All three options could theoretically meet the identified housing and employment needs for Medway, and are based upon a combination of different spatial delivery options.

Table N.5.5: *Spatial growth options identified by Medway Council*

Option	Characteristics of spatial growth option	Relationship to spatial delivery options
1. Urban Regeneration Focus	The Urban Regeneration Focus spatial growth option is characterised by: • Urban centres catering for everyday needs and acceptable walking distances to public transport nodes. • Maximising development on brownfield sites in urban and waterfront areas by applying an additional 25% (apart from Chatham Docks) to represent densification. • Limited greenfield development adjoining existing larger settlements, including Strood, Rainham, Lordswood and Hoo St Werburgh. • Employment sites are located close to new urban housing, with industry and sui generis uses at Kingsnorth and the Isle of Grain. Based on a maximum yield calculation, plus an additional 25% (apart from Chatham Docks) to represent densification, this option could accommodate up to 23,710 homes.	The Urban Regeneration Focus spatial growth option comprises the following spatial delivery options: • Urban (full) • Chatham Docks (3,000 homes) • Medway City Estate (full) • Capstone Valley (partial) • East of Rainham (full) • Hoo Peninsula (partial) • North of Strood (partial) • Suburban (full)
2. Dispersed Growth	The Dispersed Growth spatial growth option is characterised by: • Extensive release of greenfield and Green Belt land, including Hoo Peninsula, North of Rainham, Medway Valley • Sites such as Darland and Deangate, where there is the potential for environmental impacts. • Limited regeneration where there is not a confirmed or active market interest. • Large established employment sites, although the more limited town centre regeneration misses opportunities for mixed use developments. Based on a minimum yield calculation, this option could accommodate up to 25,615 homes.	The Dispersed Growth spatial growth option comprises the following spatial delivery options: • Urban (partial, i.e. consented developments only) • Chatham Docks (employment land uses only) • Capstone Valley (full) • Cliffe and Cliffe Woods (full) • East of Rainham (full)

[15] Medway Council (2023) Land Availability Assessment Interim Report, October 2023. Available at: https://www.medway.gov.uk/downloads/file/8413/medway_land_availability_assessment_september_2023 [Date accessed: 09/01/25]

Option	Characteristics of spatial growth option	Relationship to spatial delivery options
		• Hoo Peninsula (full) • Medway Valley (full) • North of Rainham (full) • North of Strood (full) • Suburban (full)
3. Blended Strategy	The Blended Strategy spatial growth option is characterised by: • Urban and new local centres catering for everyday needs and acceptable walking distances to public transport nodes. • Brownfield first with regeneration in town centres and waterfront areas, complemented by suburban and rural areas where development proposals could overcome constraints. • Likelihood of avoiding direct impacts on designations. • Likelihood of providing for the range of housing types for communities. • Density and heights in town centres that are compatible with the Chatham Design Code, other supplementary planning guidance and heritage constraints. • Avoiding coalescence of existing settlement patterns, i.e. maintaining a 'strategic gap'. • Employment sites are located close to new urban housing, with industry and sui generis uses at Kingsnorth and the Isle of Grain. Based on a minimum yield calculation, this option could accommodate up to 23,733 homes.	The Blended Strategy spatial growth option comprises the following spatial delivery options: • Urban (full) • Chatham Docks (3,000 homes) • Medway City Estate (full) • Capstone Valley (partial) • Cliffe and Cliffe Woods (partial) • East of Rainham (full) • Hoo Peninsula (partial) • Medway Valley (partial) • Suburban (full)

N51. **Table N.5.6** summarises the SA findings. The assessments and rankings of the spatial growth options are presented in full within the Regulation 18 SA Interim Report[16].

N52. The urban focus of development through Option 1 will expect to reduce reliance on private car use and increase sustainable travel. Option 1 was therefore identified as performing well with regard to a variety of SA Objectives including climate change mitigation (SA Objective 1), landscape and townscape (SA Objective 4), natural resources (SA Objective 6 and transport and accessibility (SA Objective 10). Option 2, while not ranking as the best-performing option against any SA Objective, offers health and well-being benefits due to its dispersed development approach. Furthermore, through a dispersed approach, Option 2 could reduce pressures on existing infrastructure, particularly within urban settlements. Option 3 was identified to provide the most sustainable balance by combining urban regeneration with suburban and rural development, promoting sustainable travel and addressing the needs of diverse communities.

Table N.5.6: *Impact matrix of spatial growth options (extracted from the Regulation Interim SA Report)*

[16] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 31/12/24]

	1	2	3	4	5	6	7	8	9	10	11	12
Spatial Growth Option	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
1. Urban Regeneration Focus	+	0	-	0	-	+	+	0	0	+	0	+
2. Dispersed Growth	--	-	--	--	--	--	+	0	-	-	-	+
3. Blended Strategy	-	+	0	-	-	-	++	+	0	0	+	++
Best Performing Option?	1	3	3	1	3	1	3	3	3	1	3	3

Comment from Council:

The Regulation 18 (2024) consultation presented three spatial growth options. The third spatial growth option, 'Blended Strategy', was identified as the Council's indicative preferred approach. The Interim SA found that this option is likely to offer the best balance of sustainability considerations to meet Medway's development needs. However, following the Regulation 18 (2024) consultation, the Council's emerging housing trajectory found that the two largest sites could not be expected to be completed by 2041, specifically Mill Fields (LW8) and Chatham Docks (SMI6). A strategic site to the east of Rainham (RSE10) was subsequently rejected following reconsideration the Council's assessment of land availability. No new information about the availability of sites located in town centres was received; there was limited scope to increase densities of sites in these locations. In response to the Regulation 18 (2024) consultation, representations on behalf of the Church Commissioners and Esquire Developments set out compelling cases to allocate more land to the east of Ropers Lane, Hoo St Werburgh (HHH22 & HHH31), and at Lower Rainham (RN9) respectively. Engagement with Gravesham Borough Council led to the reconsideration of three adjoining Green Belt sites to the west of Stood (SNF1, SNF2 and SR5). These sites formed part of the second spatial growth option, 'Dispersed Growth'. Meanwhile, these sites were subsequently deemed suitable, available and achievable, and crucially ensured a housing supply surplus. The final selection of sites still reflects a blended strategy, but it takes account of the outputs of the Council's assessment of land availability.

Reasonable alternative sites

N53. At the Regulation 18 stage, a total of 359 reasonable alternative sites were identified by Medway Council and evaluated in the Regulation 18 Interim SA Report[17]. The Council further categorised the 359 reasonable alternative sites, by identifying strategic sites. Strategic residential-led sites are considered to be those which comprise at least 10ha and could deliver at least 500 new homes (or at least 300 homes for sites in Allhallows, Lower Stoke, Middle Stoke, reflecting the scale of growth in these smaller villages). Strategic employment-led sites are considered to be those which comprise over 75ha. At the

[17] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 31/12/24]

Regulation 18 stage, 24 reasonable alternative strategic sites were identified, and 335 non-strategic sites.

N54. Following the Regulation 18 consultation in 2024, Medway Council have produced an updated LAA (2025)[18], which led to updated information for a number of non-strategic reasonable alternative sites, including capacity and use changes. The 335 reasonable alternative non-strategic sites comprise:

- 200 sites identified for residential use;
- 47 sites identified for non-residential use;
- 87 sites identified for mixed uses; and
- One site identified for either residential or non-residential use.

N55. The Council also identified two new reasonable alternative strategic sites, and merged two previously assessed strategic sites (Sites HHH2 and HHH31). Furthermore, the Council has provided updated information including capacity changes and change of the proposed site use. Therefore, a total of 27 reasonable alternatives strategic sites have been evaluated, comprising:

- 22 residential-led strategic sites; and
- Five employment-led strategic sites.

N56. The pre-mitigation assessments of the 27 strategic sites are presented within **Appendix F** and the pre-mitigation assessment of the 335 non-strategic reasonable alternative sites is presented within **Appendix G**, superseding the site assessment information presented within the Regulation 18 Interim SA.

N57. **Figure N.5.4** shows how a range of positive and adverse effects were likely to arise from the different reasonable alternative sites, prior to the consideration of the mitigation hierarchy.

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[18] Medway Council (2025) Medway Local Plan 2041: Land Availability Assessment, June 2025.

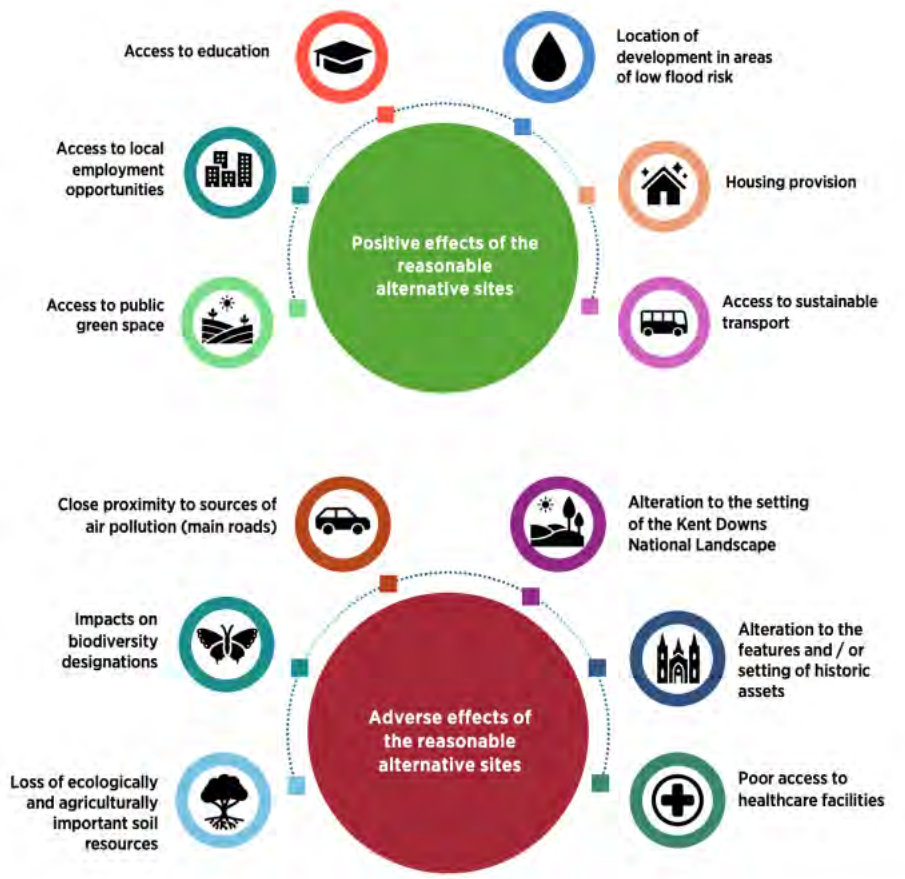

Figure N.5.4: *Summary of generalised positive and adverse effects of reasonable alternative sites*

Post-mitigation assessments of reasonable alternative sites

N58. Mitigation, using the emerging MLP policies (see **Appendix H** for the SA evaluation of policies), has been applied to the SA results for each reasonable alternative site and presented in **Appendix I**.

N59. Following the application of policy mitigation, it was identified that many of the pre-mitigation adverse effects will likely be reduced or mitigated.

N60. The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is the Council's role to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the MLP and which to 'reject' from further consideration.

N61. **Appendix J** sets out the sets out the outline reasons for selection and rejection of each reasonable alternative site considered throughout the SA process, provided by Medway Council.

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6 The preferred approach

MLP Policies

N62. Following comments received during the Regulation 18 consultations and recommendations set out in the SA reports, Medway Council have prepared the Regulation 19 Publication Version of the MLP.

N63. The MLP includes chapters which set out the overarching vision, spatial strategy and 88 strategic, thematic and development management (DM) policies. The MLP also contains 14 site allocation policies, discussed below.

N64. **Table N.5.1** below presents a summary of the assessment of 88 strategic, thematic and DM policies. These policies are generally anticipated to have positive impacts on the SA Objectives, with negative impacts associated predominantly with pollution and waste, climate change mitigation and some for biodiversity and health. Uncertain impacts have mostly been identified where site-specific contextual information is lacking which could positively or adversely impact the chosen SA Objective.

***Table N.6.1**: Summary of policy assessments (extracted from **Appendix H**)*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
Vision	++	++	+	+	+	+	++	++	++	++	++	++
SDS	+	+/-	+/-	+	+/-	+	++	+	+/-	+/-	+	++
S1	++	++	+	0	+	+	0	+	0	+	0	+
S2	+	+	+/-	+	+	+	0	0	0	0	0	0
S3	+	+	+/-	+	0	+	-	0	0	0	0	-
S4	+	+	+	++	0	+	0	+	+	0	0	0
S5	+	+	+	+	+	+	0	+	+	+	0	0
S6	+	+	+	++	0	+	0	+	+	0	0	0
DM1	+	++	+	+	+	+	0	+	0	0	0	+
DM2	0	0	+	0	+	+	+	+	0	0	0	0
DM3	0	0	+	0	+	0	0	+	0	0	0	0
DM4	0	0	0	0	+	0	0	+	0	0	0	0
S7	+	+	+	+	0	+	+	+	0	0	0	0
T1	+	+	+	++	0	+	+	+	+	+	+	+
DM5	+	0	+	+	+	0	+	+	0	0	0	0
DM6	+	0	0	+	+	+	+	+	0	+	+	+
DM7	0	0	0	+	0	0	0	0	+	0	0	0
DM8	0	0	0	+	0	0	0	0	0	0	0	0
S8	0	0	0	+	0	0	0	+	++	0	0	0
DM9	0	0	0	+	0	0	0	0	+	0	0	0
S9	+	0	0	+	0	0	0	0	++	+	0	+
DM10	0	0	0	+	0	0	0	0	+	0	0	0
DM11	0	0	0	0	0	0	0	0	+	0	0	0
T2	+	0	0	0	0	0	+	+	0	0	0	+

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T3	+	0	0	0	0	0	+	+	0	0	0	0
T4	0	0	0	0	0	0	+	+	0	+	0	0
T5	+	0	0	0	0	0	+	0	0	+	+	0
T6	0	0	0	+	0	0	+	0	0	0	0	0
T7	0	0	+	0	0	0	+	0	0	0	0	0
T8	0	0	0	0	0	0	+	0	0	0	0	0
T9	0	0	0	+	0	0	+	0	0	0	0	0
T10	0	+	+/-	-	+/-	+	+	+	+/-	+	+	0
T11	0	0	0	+	0	0	+	0	0	+	0	+
S10	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++
S11	0	0	0	0	0	0	0	0	0	0	0	+
S12	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++
T12	+	0	0	0	+	0	0	+	0	+	++	+
T13	0	+	+	+	0	0	0	+	+	+/-	0	+
S14	0	0	0	+	0	0	0	+	+	+	0	+
T14	0	0	0	0	0	0	0	0	0	+	0	+
S15	+	+	+	+	+	+	0	+	+/-	+	0	++
S16	+	+	+/-	+	+	+	0	+	+/-	+	0	++
T15	+	+	+/-	+	+	+	0	+	+/-	+	0	+
T16	0	0	0	0	0	0	0	0	0	0	0	+
T17	+	0	0	0	0	0	0	+	0	+	0	+
S17	+	0	0	0	0	+	+	+	+/-	+	0	++
S18	+	0	0	0	0	0	0	+	0	0	0	+
S19	0	0	0	+	+	0	0	+	0	+	0	+
S20	+	0	0	+	+	+	0	++	+/-	+	0	++
S21	0	0	0	0	+	0	0	+	0	+	0	+
S22	+	0	0	0	+	0	0	+	0	+	0	+
S23	0	0	0	0	0	0	0	0	0	0	0	+
DM12	+	0	0	+	+	0	0	+	0	+	0	+
T18	+	0	0	0	+	0	0	+	0	+	0	+
T19	0	0	0	+	0	0	0	0	0	0	0	+
DM13	+/-	0	0	0	+/-	0	0	+	0	+/-	0	+
DM14	+/-	0	0	+	+/-	+	0	+	+	+	0	+
DM15	+	0	0	0	+	0	0	+	0	+	0	0
T20	+	0	+/-	+	+	0	0	+	+/-	+	0	0
DM16	+	0	+/-	+/-	+	0	0	+	0	+	0	+
DM17	+	0	0	0	+	0	0	0	0	++	0	+
T21	0	0	0	0	0	+	0	0	+/-	+	0	++
T22	0	0	0	0	0	0	0	0	+/-	0	0	+
T23	0	0	0	0	0	0	0	0	0	+	+	+
T24	+/-	0	0	0	+/-	0	0	0	0	+/-	0	+
T25	+	0	0	+	+	0	0	+	0	+	0	0
T26	+	0	0	0	+	0	0	+	0	+	+	0
DM18	+	0	0	0	+	0	0	+	0	++	+	+
DM19	+	0	0	+	0	+	0	0	0	+	0	+

Policy ref	SA1 CC Mitigation	SA2 CC Adaptation	SA3 Biodiversity and geodiversity	SA4 Landscape and townscape	SA5 Pollution and waste	SA6 Natural resources	SA7 Housing	SA8 Health and wellbeing	SA9 Cultural heritage	SA10 Transport and accessibility	SA11 Education	SA12 Economy
DM20	+	0	0	+/-	+	0	0	+	0	+	+	+
T27	+	0	0	0	0	0	0	++	0	+	0	0
T28	+	+	+	+	0	0	0	++	0	0	0	0
DM21	+	+	+	+	+	0	0	++	0	+	0	0
T29	+	0	0	0	0	0	0	+	+	+	0	0
S24	+	+	0	++	+	0	0	++	0	++	++	+
DM22	+	0	0	0	+	0	0	0	0	+	+	++
T30	0	0	0	0	0	++	+/-	0	0	0	0	+
T31	0	0	0	0	0	+	+/-	0	0	0	0	+
T32	+	0	-	+	+	+	0	-	+/-	+	0	+
T33	+	0	-	-	-	++	0	-	+/-	+	0	+
DM23	+	0	0	0	++	+	0	0	0	0	0	0
T34	0	0	0	0	+	0	0	0	0	0	0	0
T35	+/-	-	-	-	++	-	0	-	-	-	0	0
T36	0	0	0	0	+	+/-	0	0	0	0	0	0
T37	+	+/-	+/-	+/-	+	+/-	0	+/-	+/-	+/-	0	0
T38	+/-	+/-	+/-	0	+	+/-	0	+/-	+/-	+/-	0	0
T39	+/-	0	0	+	+	+	0	0	+	+/-	0	0
T40	0	0	0	0	+	0	0	0	0	0	0	0
S25	++	--	--	-	+/-	-	0	+/-	-	-	+	++
T41	+	0	0	0	0	0	0	+	0	0	0	0

Site allocations

N65. The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is the role of the Council to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the MLP and which to 'reject' from further consideration (see **Appendix J** for more details).

N66. A total of 131 sites have been selected for allocation in the MLP by Medway Council. This includes 12 'strategic' sites and 119 'non-strategic' sites.

N67. These sites will collectively result in the delivery of 21,194 homes to meet identified needs (in combination with 1,762 pipeline sites and 1,584 windfall sites) and sufficient land for a portfolio of employment sites that meet the needs of different types of businesses to meet the identified employment land needs (204,000m^2 industrial and 36,500m^2 office space, plus account for lack of building stock identified in the ELNA).

N68. As discussed in **Chapter N.5**, all reasonable alternative sites were evaluated in the SA process pre-mitigation (see **Appendix F** for strategic sites and **Appendix G** for non-strategic sites) and post-mitigation (see **Appendix I**). The SA findings were fed back to the Council on an iterative basis to assist in decision-making regarding the selection or rejection of each site within the emerging MLP.

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Site allocation policies

N69. In addition to the 88 strategic, thematic and DM policies as outlined above, Medway Council has prepared 14 site allocation policies. Each policy relates to a number of site allocations that have been proposed for inclusion in the MLP, grouped by geographic area.

N70. Each site allocation policy has been evaluated in **Appendix K**, drawing on the post-mitigation site assessments as presented in **Appendix I**. The assessment considers the extent to which the provisions of the 14 site allocation policies will further improve sustainability of these sites, compared to the post-mitigation assessment findings.

N71. The assessment findings are summarised in **Table N.6.2**. The majority of site policies will ensure sustainable access to schools, healthcare, jobs and local services are improved (SA Objectives 8, 10, 11, 12). The policies will ensure that, particularly in the urban areas, opportunities are sought for heritage-led development and regeneration to conserve and enhance the landscape/townscape and historic environment (SA Objective 4 and 9). The majority of sites lie in Flood Zone 1 where fluvial flood risk is low and climate change adaptation measures can be secured via careful integration of GI (SA Objective 2).

N72. However, potential adverse impacts have been indentified in relation to the loss of high-quality agricultural land (SA Objective 6), alteration of rural landscape character (SA Objective 4), and the generation of pollution associated with new development (SA Objective 5). For more rurally located sites, minor negative effects have been identified in relation to transport and access to healthcare (SA Objectives 8 and 10). Some allocations lie within Flood Zones 2 and/or 3, where site-specific flood risk assessments will be required to confirm the potential for mitigation (SA Objective 2).

N73. Uncertainty remains in the assessment against climate change mitigation (SA Objective 1) where there is potential for both positive and adverse effects on GHG emissions associated with the scale of development proposed alongside encouragement for minimising embodied emissions and supporting sustainable energy infrastructure. Additionally, the impacts of all allocations on biodiversity are uncertain at the time of writing, in absence of the HRA conclusions (SA Objective 3). For all policies, the potential impacts on Medway's constrained transport network will need to be carefully considered in light of the findings of the emerging Strategic Transport Assessment.

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Table N.6.2: *Summary of site policy assessments (extracted from* ***Appendix K****)*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA1	+/-	0	+/-	0	-	0	++	+	0	++	+	+
SA2	+/-	-	-	+	-	0	++	+	+	++	+	+
SA3	+/-	+	+/-	0	-	+	++	+	0	++	+	+
SA4	+/-	-	+/-	+	-	0	++	+	+	++	+	+
SA5	+/-	-	+/-	-	-	-	++	+	0	++	+	+
SA6	+/-	+	+/-	0	-	--	++	0	0	+	++	+
SA7	+/-	+	+/-	-	-	--	++	0	0	+	++	+
SA8	+/-	+	+/-	-	-	--	++	-	0	+	++	++
SA9	+/-	+	+/-	-	-	--	++	-	0	+	+	+
SA10	+/-	+	+/-	-	-	--	++	0	0	+/-	++	+
SA11	+/-	-	+/-	-	-	--	++	-	0	-	0	+
SA12	+/-	-	+/-	-	-	-	++	-	0	-	+	+
SA13	+/-	+/-	-	+/-	--	-	++	-	0	+	+	+
SA14	+/-	-	+/-	-	--	--	0	-	0	-	0	++

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7 Likely significant effects on the environment

Identified impacts, mitigation and residual effects

N74. Proposals in the MLP have been assessed for their sustainability impacts, the results of which are presented in the relevant appendices and/or report chapters as described in the above NTS chapters. The assessment of the MLP, including reasonable alternatives, was undertaken using a combination of available evidence and professional judgement.

N75. **Table N.7.1** provides an overview of the evaluation of the MLP against the SEA topics as provided in the main Regulation 19 SA Report.

N76. The second column of **Table N.7.1** provides a summary of the potential negative impacts of the MLP relating to each of the sustainability themes (as set out in full within **Chapters 7-15** of the main SA Report, **Volume 2**). These are impacts that have been identified prior to the implementation of MLP mitigation.

N77. Column three of **Table N.7.1** summarises the effects of the MLP policies which are expected to mitigate or help to reduce some of the potentially negative impacts.

N78. In some cases, the MLP policies are likely to fully mitigate identified effects or lead to longer term benefits. The MLP policies, however, are not anticipated to fully mitigate all of the identified effects. The residual effects are identified and drawn to the attention of the plan makers and summarised in the final column of **Table N.7.1**.

Cumulative effects

N79. The cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the Local Plan and assessed alongside known existing underlying trends and other PPPs.

N80. Cumulative effects are different from effects that occur alone. Alone, the Plan may not result in residual adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.

N81. Cumulative effects of the MLP are discussed in **Table N.7.1** alongside the identified residual effects, with the full CEA provided in **Chapter 16** of the main Regulation 19 SA Report.

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Table N.7.1: *Summary of identified impacts, mitigation and residual effects of the Medway Local Plan*

Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
AIR	• **Increased generation of, and exposure to, air pollution**, such as NO_2 and particulate matter, from the construction and occupation of new development and associated traffic. Increased pollutant levels can affect respiratory health and lead to adverse effects on vulnerable habitats.	• Policy **DM3 (Air quality)** promotes design to improve emissions, such as electric charging points and low NO_2 boilers. Development which may negatively impact air quality will provide an air pollution impact assessment with mitigation measures, including development in proximity to an AQMA or biodiversity designation. • **The Spatial Development Strategy**, Policy **T26 (Accessibility standards)** and **Policy DM20 (Cycle parking and storage)** aim to reduce reliance on cars and need to travel by facilitating sustainable and active transport. • Policy **S5 (Securing strong green and blue infrastructure),** Policy **T27 (Reducing health inequalities and promoting health and wellbeing),** and Policy **DM6 (Sustainable design and construction)** all support provision of infrastructure that reduces air pollution. • Site Policy **SA1 (Chatham Town Centre and Surrounds)** will ensure air quality in Central Medway AQMA is addressed through the proposal design.	• Despite technological and infrastructure advancements, the proposed development of new homes and employment sites are expected to increase traffic volume and energy demand. **Therefore, increased pollutant emissions, particularly NO_2 and PM_{10}, cannot be fully mitigated by MLP policies alone.** • Continuing the transition to clean technologies will occur over the coming years. **The long-term effect on emissions and air quality is likely positive, but short-term negative effects are expected.**
BIODIVERSITY, FLORA & FAUNA	• **Threats or pressures to European sites** including Cannock Chase SAC (see the HRA for more details). • **Threats or pressures to nationally or locally designated and non-statutory biodiversity sites**, including from recreational disturbance or increased water/air pollution from visitors to the sites. • **Fragmentation of the ecological network** including priority habitats.	• Policy **T1 (Promoting high quality design)** protects existing trees and aims to establish new landscape features that promote biodiversity. • **Policy S2 (Conservation and enhancement of the natural environment) requires** development proposals to strengthen biodiversity networks and ensure effective mitigation in sensitive locations, including European sites. It promotes conservation, restoration, and enhancement of MCZs, SSSIs, LNRs, LWSs, High Halstow NNR, and ancient woodlands. National requirements mean development proposals must also provide measurable net gain of 10% BNG.	• **Policy S2** will help mitigate adverse impacts on designated biodiversity sites arising from most development proposed in the MLP. However, the policies may not fully mitigate adverse effects on SSSIs where proposed sites coincide with, or are adjacent to, SSSIs. These sites should be subject to specific consultation with NE. The MLP is expected to result in a residual adverse impact on SSSIs within the Plan area. **A potential long-term significant effect on nationally designated biodiversity sites is identified.**

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Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
		• **The Kent and Medway Local Nature Recovery Strategy** is likely to encourage opportunities to improve habitat connectivity • **Policy S3 (North Kent Estuary and Marshes designated sites)** requires residential development within the 6km ZOI to contribute to the North Kent SAMMS, and that larger sites beyond the ZOI may need mitigation to offset adverse recreational effects. • Policy **S5 (Securing strong green and blue infrastructure)** encourages the use of GI to provide protection for European, nationally designated, locally designated, and non-statutory biodiversity sites. • Policy **T10 (Gypsy, Travellers and Travelling Showpeople)** and Policy **T22 (Marinas and moorings)** require development to be away from/have consideration for nationally designated sites.	• **The MLP** policies are likely to mitigate adverse impacts from development proposals which are near locally designated and non-statutory biodiversity assets. The MLP policies will not be expected to fully mitigate adverse effects on sites which coincide with LWSs or are adjacent to a LNR or LWS, where there is potential for habitat loss or degradation associated with designations. They may enhance habitat connectivity and strengthen the resilience of ecological and GI networks against current and future pressure. They support the conservation and expansion of GI coverage, habitat creation, provision of opportunities to improve biodiversity feature connectivity, and promote the protection and enhancement of Kent and Medway LNRS. **A long-term positive impact on biodiversity is anticipated**.
 CLIMATIC FACTORS	• Some new development is located in areas of higher **fluvial and surface water flood risk** where there may be increased risks to human health or damage to properties. • Increased **GHG emissions** due to the construction and occupation of new development and associated traffic. • **Loss of multi-functional green infrastructure** that may reduce resilience to climate change. • **Reduced viability of flood defences**	• Policy **DM1 (Flood and water management)** aims to minimize flood risk with site-specific flood risk assessments with Sequential and Exception testing and providing flood risk management infrastructure. This includes locating development in low-risk areas, maintaining flood risk infrastructure, and contributing to EA's flood risk management programme. It also seeks to minimize surface water flood risk by providing site-specific flood risk assessments and providing flood risk management infrastructure. This includes preparing Surface Water Drainage Strategies such as the implementation of SuDS which replicate greenfield runoff rates. It states that *"development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted unless it can be suitably mitigated".* This includes continued inspection, maintenance, repair and replacement of existing flood defences.	• MLP policies are expected to protect future and existing flood defences from development. **There are no anticipated significant adverse effects on flood defence viability associated with development proposed in the MLP.** • Although relevant MLP policies may be positive in reducing GHG emissions, particularly with energy efficient design and low carbon sources, they may not fully mitigate the impacts of the large growth expected from the Plan. **An increase in GHG emissions as a consequence of the proposed development is expected to be a long-term and permanent significant effect.** • There may be some loss of previously undeveloped land associated with

Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
		• Site Policy **SA4 (River Waterfront)** requires flood mitigation and/or a flood defence wall to enable delivery of allocated sites near the waterfront of north Gillingham. • Site Policy **SA13 (Frindsbury Peninsula Opportunity Area)** highlights emerging Planning Framework that will guide area development, including delivery of strategic flood risk infrastructure. • Policy **S1 (Planning for climate change**) ensures development proposals will include opportunities for adaptation to, and mitigation of, climate change to progress towards achieving net zero carbon in Medway by 2050. The policy promotes effective spatial planning, use of renewable and low carbon technologies and design, delivery of GI, and management of water resources and flood risk. The criteria for **S1** are underpinned by Policy **DM3 (Air quality)**, Policy **DM6 (Sustainable design and construction)**, Policy **S25 (Energy supply)** and Policy **T41 (Heat networks)**, aiming to reduce Medway's carbon footprint. • Policy **S2 (Conservation and enhancement of the natural environment)** encourages development to be located away from biodiversity designations, restoring and enhancing biodiversity across the Plan area. • Policy **S5 (Securing strong green and blue infrastructure)** encourages use of GI to manage surface water flood risk and adapt to the impacts of climate change, helping to conserve and enhance the GI network in the borough. This includes the implementation and management of SuDS. • Policy **T28 (Existing open space, outdoor sports and play spaces)** and Policy **DM21 (New open space, outdoor sports and play spaces)** both encourage the use of well-managed open spaces to help mitigate surface water flood risk.	development sites. Comprised of or containing greenfield land, however MLP policies seek to conserve and enhance multi-functional green and glue infrastructure across the Plan area. **Supporting GI delivery throughout the Plan area means a positive effect on Medway's climate change adaptation is expected.**

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Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
		• The **Spatial Development Strategy** encourages development proposals to use previously developed land and invest in urban areas.	
CULTURAL HERITAGE	• The introduction of new development may lead to **changes in the character and/or setting of designated heritage assets and Conservation Areas** • New development may also lead to adverse **effects on historic character**	• Site Policy **SA5 (Strood District Centre and Surrounds)** ensures development sensitively addresses Rochester Castle and its setting. • Policy **S8 (Historic environment)** supports development that "positively contributes to local distinctiveness and character", and "preserves or enhances the significance of designated and non-designated heritage assets and their settings." This includes making sensitive and sustainable reuse of heritage assets, especially those 'at risk'. • Policy **S9 (Star Hill to Sun Pier)** focuses on conserving and enhancing assets within the identified Heritage Action Zone (HAZ). • Policy **DM9 (Heritage assets)** promotes *"a high quality of design which will preserve and seek to enhance the asset's significance and setting."* A Heritage Statement will be required for development proposals in proximity to heritage assets. No demolition or loss of a heritage asset will be permitted unless exceptional circumstances are demonstrated. • Policy **DM10 (Conservation areas)** only permits development within a CA where it *"contributes positively to the conservation and enhancement of the character, appearance and distinctiveness of the area."* • Policy **DM11 (Scheduled monuments and archaeological sites)** does not permit development which adversely impacts SMs or their setting. • Policy **T1 (Promoting high quality design)** encourages developments which respond to the character and appearance of their settings.	• Adverse impacts on the character and setting of designated heritage assets including listed buildings and their settings may be mitigated through various MLP policies. A range of plans, programmes and legislation, including the NPPF and local guidance allow protection of heritage assets in line with their significance. **The MLP will be expected to help avoid or mitigate potential significant impacts on designated heritage assets arising from proposed development, with a negligible impact identified overall.** • Adverse impacts on the character and setting of CAs are anticipated to be mitigated through various MLP policies. **The MLP is expected to help avoid or mitigate the potential for significant impacts on conservation areas arising from proposed development, with a negligible impact identified overall.** • **Effective design policies such as T1, DM6, S8 and DM9 are likely to deliver positive effects for urban areas.**

Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
HUMAN HEALTH	• A small number of allocations are situated in areas with limited **sustainable access to healthcare facilities** • **Exposure to air/noise pollution** (from AQMAs/main roads) with implications for health • **Net loss of public greenspace** where some allocations coincide with current open spaces • Limited access to PRoW and/or cycle network	• Various site allocation policies include provisions of new healthcare hubs, as well as the retention and/or provision of open space and sports facilities. • Site Policy **SA1 (Chatham Town Centre and Surrounds)** will ensure air quality in Central Medway AQMA is addressed through the proposal design. • Several site allocation policies include new/enhanced cycle and pedestrian routes, including the Gillingham Greenway within Site Policy **SA4 (River Waterfront)**. • Policy **S5 (Securing strong green and blue infrastructure)** will help to conserve and enhance Medway's multi-functional GI network and greenspaces. • Policy **DM3 (Air quality)** addresses air quality issues across Medway and promotes appropriate design to improve emissions, such as through the installation of electric charging points and low NO_2 boilers. • Policies including **DM15, T4, T5, T10, T27, S14** and **S15** all encourage improved public transport provision and accessibility, which is likely to improve access to healthcare facilities. • Policy **T26 (Accessibility standards)** requires new developments to meet standards for a 15-minute walk or cycle to local amenities. This will improve accessibility to healthcare provision. • The **Spatial Development Strategy**, Policy **T26 (Accessibility standards)** and Policy **DM20 (Cycle parking and storage)** aim to reduce reliance on cars and travel needs through facilitating sustainable and active modes of transport. • Policy **T27 (Reducing health inequalities and promoting health and wellbeing)** aims to improve sustainable access to health and wellbeing facilities, reduce health inequalities, and requiring Health Impact Assessments for specific development proposals. It also aims to increase accessibility to	• Local Plan policies, such as T26 and T27, will help prevent loss of existing healthcare facilities and improve sustainable access to facilities for residents; However, the policies will not be expected to fully mitigate the restricted healthcare service access for sites in more isolated settlements. The GP-to-patient-ratio in Medway is worse than the national average, with some surgeries not accepting new patients, meaning residents may not be registered with their most local surgery. **Limited sustainable access to healthcare facilities is expected to be a medium-term and temporary significant effect.** • Several MLP policies are expected to reduce the likelihood and extent of potential adverse impacts of air pollution on human health and biodiversity assets. However, the proposed development in the MLP means the likely associated increases in traffic flows and reduction in air quality within an existing AQMA may have residual adverse effects which cannot be fully mitigated through MLP policies. **Adverse effects on health as a result of poor air quality across Medway is expected to be a long-term significant effect, although the extent of this impact may reduce over time as clean technologies improve.** • **The MLP policies will be expected to ensure that development proposals do not cause a loss of public greenspace across the borough, leading to a negligible overall effect. Further positive impacts on access to greenspace could be achieved in the longer term, through the provision of**

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Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
		recreational opportunities such as greenspaces. A way of doing this is encouraging improvements to walking, wheelchair, and cycling routes. • Policy **T28 (Existing open space, outdoor sports and play spaces)** and **Policy DM21 (New open space, outdoor sports and play spaces)** encourage adequate open space and greenspace provision, including replacement of losses of open space or greenspace. • Policy **DM20** sets out required cycle parking standards which will help to facilitate travel via bicycle.	**on-site or off-site GI provisions, dependent on more site-specific context and information.** • The majority of allocated sites are adjacent to existing pedestrian routes and/or cycle paths. Various MLP policies seek to create permeable neighbourhoods and promote cycling and walking, which would likely improve the coverage of, and accessibility to, Medway's pedestrian and cycle networks. **An overall positive effect would be likely with regard to pedestrian and cycle access.**
 LANDSCAPE	• Threaten or result in the **loss of locally distinctive or sensitive landscapes** such as the Kent Downs National Landscape • Alteration of landscape character • New development may lead to **changes in views** from local residents or users of the PRoW network • Increase urban sprawl and coalescence between settlements	• Site Policy **SA1 (Chatham Town Centre and Surrounds)** and **SA5 (Strood District Centre and Surrounds)** require views analysis to inform development. • Site Policy **SA8 (Hoo St Werburgh and Chattenden)** requires a strategic landscape corridor to separate of Hoo and Chattenden. • Site Policy **SA9 (High Halstow)** avoids coalescence with nearby settlements using landscape buffers. • Policy **S4 (Landscape protection and enhancement)** requires development proposals to demonstrate their response to key sensitivities and qualities of the surrounding landscape, including the Kent Downs National Landscape. It also requires development to conserve and enhance Medway's local landscape character and distinctiveness, such as North Kent Marshes. Proposals are encouraged to be in areas of lower landscape sensitivity and to consider visual landscape attributes. • Policy **S5 (Securing strong green and blue infrastructure)** encourages development proposals to reflect local character by providing multi-functional GI.	• Various **MLP policies** (specifically Policy **S6**) protect nationally designated landscapes. Plans, programmes and legislation including the NPPS protect nationally designated landscapes in line with their significance. The MLP will be expected to help avoid/mitigate the potential for significant impacts on nationally designated landscapes from proposed development, with a negligible impact identified overall. • Due to the proposed development's scale, with a large proportion in previously undeveloped locations, the policies are not expected to fully mitigate the potential impacts on landscape character and an adverse effect is anticipated. **Alteration of landscape character is a long-term, permanent, significant effect. There is potential for a cumulative adverse effect on landscape character resulting from the proposed development.** • The **MLP policies** provide some protection for visual amenity and views

Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
		• Policy **S6 (Kent Downs National Landscape)** seeks to ensure developments within or in the setting of the National Landscape conserve and enhance its character. This includes Ranscombe Farm Country Park (within the National Landscape) and may also apply to Capstone Farm Country Park, due to its proximity. • Policy **S7 (Green Belt)** aims to maintain a strong Green Belt within Medway and would ensure new development is only permitted in the Green Belt in exceptional circumstances. • Policy **T1 (High Quality Design and Amenity)** will ensure development is appropriate to its surroundings and informed by Landscape and Visual Impact Assessment. It also seeks to retain urban/rural distinctiveness through containing settlements to avoid coalescence. • The **Spatial Development Strategy** encourages renention of separation between urban Medway and the Hoo Peninsula through green corridors between the areas.	and may help mitigate adverse impacts, but it is likely a residual impact will remain due to the large proportion of development being proposed on previously undeveloped sites with regard to the PRoW and existing properties. An adverse residual impact of alteration of views for a number of allocated sites is anticipated. **Alteration of views is likely to be a long-term and permanent minor adverse effect.** • Various MLP seek to minimize impacts on the countryside and maintain separation between settlements with the Green Belt and open countryside. However, as some new development is rural, the Local Plan policies are not expected to fully mitigate these impacts, and a residual adverse effect is anticipated. **An increased risk of urbaisation of the countryside and coalescence is a long-term and permanent significant effect,**
 POPULATION & MATERIAL ASSETS	• The MLP needs to ensure the **provision of housing and employment opportunities** to meet local need • A small number of allocations are situated in areas with limited **sustainable access to services and facilities** • Increased **pressure on local services** from new development • Some development is located in deprived areas where there are **inequalities to be addressed**	• **The Spatial Development Strategy** allocates 21,194 new dwellings for the Plan period. • Site Policy **SA14 (Employment Sites)** sets out a range of employment land uses and floorspace to be delivered within the Plan period including 324,450m^2 at MedwayOne (former Kingsnorth Power Station). • Policy **S10 (Economic strategy)** will *"seek to boost Medway's economic performance, securing a range of jobs for its workforce,"* which includes improving the range of employment sites within Medway, which is likely to compensate for any loss of employment floorspace. • Policy **S15 (Town centres strategy)** supports extended retail provision and the development of in-	• In order to meet the identified housing need, the Local Plan proposed to deliver 21,194 new dwellings. Policies in the Plan set out requirements to provide an appropriate mix of housing types and tenures, seeking to meet the needs of different groups, including older people. **A positive effect on housing provision is anticipated.** • The plan provides sufficient land for employment sites that meet the needs of different types of businesses. The strategy recognises the potential to realise the strategic economic role of sites such as Grain and Kingsnorth in

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Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
	• Increased **household waste generation** • Potential **sterilisation of mineral resources**	centre and edge of centre locations for employment outside of designated employment areas. • Policy **DM17 (Grain Branch)** aims to safeguard land for a potential railway station and will not permit development that may compromise new rail infrastructure in this area. • Policy **DM18 (Transport assessments, transport statements and travel plans)** requires all development proposals that will generate a significant amount of movement to be supported by a Transport Assessment or Statement, or commitment to provide one. • Policy **DM23 (Waste prevention)** encourages design principles that minimise waste and locally produced and recycled resources. • Policy **T2 (Housing mix)** aims to ensure that residential developments meet the identified local housing needs, supporting the current and future requirements of the population in terms of housing type and size, as well as providing specialist accommodations for those with particular needs. • Policy **T3 (Affordable housing)** sets out the requirements to deliver affordable housing in urban and rural communities, to ensure that suitable residential development is provided to meet the social and economic needs of the population. • Policy **T26 (Accessibility standards)** requires all proposals to be accessible to a secondary school or social space via a 15-minute bus journey. • Policy **T30 (Safeguarding mineral resources)** ensures development is permitted only where it would not intervene with current or potential extraction of valuable mineral resources. • Policy **T31 (Safeguarding of existing mineral supply infrastructure)** safeguards existing mineral supply infrastructure from development that may limit their operation.	growing sectors. **A positive effect on employment provision is anticipated.** • The MLP policies are expected to improve access to local services and facilities for most sites through improved transport networks, developer contributions to services, and new service provision. However, access could remain limited within some rural sites, although the Travel Plans will potentially address this. **A residual negligible impact is identified for access to local services.** • The Waste Needs Assessment (WNA) found sufficient existing consented capacity to meet requirements for recycling, composting and inert waste over the Plan period, but a shortfall in non-inert waste to landfill. The construction and occupation of new homes and businesses could cumulatively increase non-inert waste production and potentially impact the capacity of existing waste facilities. **The cumulative impact of increased waste generation on the capacity of waste management facilities could potentially be a medium-term, but potentially temporary, significant effect.** • Policies T30 and T31 are expected to ensure that potential impact on safeguarded minerals is avoided or minimised. **A minor positive effect on**

Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
		• Policies **T34 (Safeguarding of existing waste management facilities)** and **T35 (Provision of additional waste management capacity)** safeguard current waste infrastructure and increase its capacity for waste management. • Policy **T37 (Other recovery)** supports provision of energy from waste facilities where waste cannot be reused or recycled. • Policies including **DM15, T4, T5, T10, T27, S16** and **S17** all encourage development to be in areas accessible to public transport whilst encouraging co-location of services. This includes improving bus links.	**mineral resource conservation will be expected.**
 SOIL	• Direct **loss of soil resources** due to construction of new development which contains previously undeveloped land. The MLP could result in the loss of up to c.1,110ha of previously undeveloped land, of which c.980ha is potential BMV land[19].	• The **Spatial Development Strategy** encourages development proposals to make use of previously developed land, locating development away from greenfield land with high value soil. • Policy **S4** (Landscape protection and enhancement) aims to provide local nature recovery networks and improve habitat connectivity, consequently areas of BMV soil. • Policy **S5** (Securing strong green and blue infrastructure) will help conserve and enhance the borough's GI network, including BMV soil. • Policy **T14** (Rural economy) supports employment development in the countryside that does not lead to significant loss of high-grade agricultural land and can demonstrate that locations of lower agricultural land values are not suitable.	• The proposed allocations would cumulatively result in the loss of a significant amount of previously undeveloped land. The loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across the borough. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality and agricultural yield. Therefore, a residual adverse effect will be expected. **The loss of previously undeveloped land, a large proportion of which could include BMV land, is**

[19] Please note this figure is based on gross site areas and does not take into account net developable areas excluding new open space / green infrastructure provision or sites which are already partially developed.

Additionally, in absence of a detailed subgrade assessment distinguishing between Grade 3a and 3b, the total area of BMV land has been calculated on the assumption that all land classified as Grade 3 is Grade 3a. This approach may overestimate the actual extent of BMV land. A more accurate classification would require site-specific ALC survey data.

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Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
			expected to be a long-term and permanent significant adverse effect.
WATER	• **Reduction in water quality** and ecosystem services due to increased run-off of pollutants • Increased **demand for water and wastewater management** due to new development	• Policy **DM1 (Flood and water management)** promotes efficient water usage and will ensure that adequate wastewater infrastructure is provided for new development. Development will be required to be in accordance with the Water Resource Management Plans published by South East Water and Southern Water to ensure public water supplies are maintained. Additionally, the policy will ensure that all new development integrates the requirements of the Thames River Basin District Management Plan[20] including to improve water quality. • Policy DM1 and **Policy S5 (Securing strong green and blue infrastructure)** encourage the preparation of Surface Water Drainage Strategies including the implementation of multi-functional SuDs to provide benefits for water quality. • Policy **T40 (Wastewater treatment)** promotes effective wastewater disposal in line with regulatory provisions.	• While MLP policies and consultation with water companies will help reduce water quality impacts, development may still increase sewage discharge into rivers, requiring further monitoring. A residual adverse effect on water quality and ecosystem services remains possible, in line with the precautionary principle. **Deterioration in water quality and ecosystem services has the potential to be a long-term but potentially temporary significant effect.** • National and MLP policies, along with broader water management frameworks, aim to improve water efficiency and mitigate adverse effects. Whilst it is likely that these measures will mitigate any adverse effects, at the time of writing, no data has been made available to confirm whether wastewater treatment works (WwTW) that serve Medway will have capacity for the projected growth, or whether sufficient water resources are available to support water supply for new development. **Uncertainty remains regarding the potential for increased pressure on water supply and**

[20] Environment Agency (2022). Thames River Basin District Management Plan. Available at: www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022 [Date accessed: 26/03/25]

Sustainability theme	Potential Impacts of the MLP	Mitigating MLP policies	Summary of residual effects
			wastewater management infrastructure.

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Conclusions

N82. Overall, the MLP is expected to deliver a range of positive outcomes, including enhanced biodiversity and ecological networks, improved GI and public greenspace, the provision of needed housing and employment opportunities, and the conservation of mineral resources. Overall, it supports sustainable development while promoting climate resilience and economic growth.

N83. Identified adverse effects largely relate to the potential for the growth proposed in the MLP to cumulatively lead to an increase in GHG emissions, air and water pollution, and the loss of soil resources. These impacts include issues that the MLP cannot fully address alone, such as the increased frequency of storm events linked to broader national and international climate trends. Additionally, the Plan may contribute to residual negative effects on biodiversity, landscape character, urban sprawl, and access to healthcare in rural areas, many of which are long-term and cannot be entirely mitigated through local policy measures.

N84. It will be important to ensure effective monitoring is in place so that Medway Council can respond to these effects during the lifetime of the MLP.

Monitoring

N85. Monitoring proposals are set out in **Table N.7.2** for Medway to consider in the implementation of the MLP.

Table N.7.2: *Proposals for monitoring adverse sustainability impacts of the MLP*

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO_2 and PM_{10}	Annually, Plan area wide	Decrease
Air	Road network performance	Bi-annually, Plan area wide	Decrease
Air	Number of vehicle trip credits (i.e. vehicle trip generation from new development)	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of planning approvals granted contrary to the advice of Natural England	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Quality and extent of priority habitats	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Uplift in biodiversity net gain units within Medway	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Implementation of measures from the North Kent SAMMS	Various	Various
Climatic factors	CO_2 emissions per capita	Annually, Plan area wide	Decrease

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Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Climatic factors	Percentage of energy generated from renewable sources	Annually, Plan area wide	Increase
Climatic factors	Number of properties at risk of flooding	Annually, Plan area wide	Decrease
Climatic factors	Extent of surface water flood risk	Annually, Plan area wide	Decrease
Climatic factors	Fluvial/tidal flood risk along the River Medway	Annually, Plan wide area	Decrease
Cultural heritage	Number of conservation area appraisals	Annually, Plan area wide	Increase
Cultural Heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP surgeries	Annually, Plan area wide	Increase
Human health	Hectares of accessible open space per 1,000 population	Annually, Plan area wide	Increase
Landscape	Quantity of development in sensitive landscapes	Annually, Plan area wide	Zero
Landscape	Quality and extent of green infrastructure	Annually, Plan area wide	Increase
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in Medway within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste sent to landfill	Annually, Plan area wide	Decrease
Population and material assets	Quantity of commercial and industrial waste recycled	Annually, Plan area wide	Increase
Population and material assets	Area of safeguarded mineral resources	Annually, Plan area wide	Maintain
Soil	Number of dwellings built on previously developed or brownfield land	Annually, Plan area wide	Increase
Soil	Area of contaminated land remediated	Annually, Plan area wide	Increase
Water	Number of planning permissions granted contrary to Environment Agency advice	Annually, Plan area wide	Zero
Water	Number of waterbodies classified as 'good' ecological status	Annually, Plan area wide	Increase
Water	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water	Water efficiency in new homes	Annually, Plan area wide	Increase
Water	Water availability for extraction	Annually, Plan area wide	Increase

Consultation and next steps

N86. The Regulation 19 SA Report will be published alongside the Publication Version of the Medway Local Plan.

N87. A minimum of a six-week period of consultation will be undertaken by Medway Council to offer statutory consultees, stakeholders, organisations and individuals an opportunity to submit representations regarding the MLP, as well as supporting evidence including this SA Report.

N88. Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.

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Sustainability Appraisal of the Medway Local Plan

Volume 2 of 3: Regulation 19 SA Report

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June 2025

LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Medway Local Plan

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Volume 2 of 3: Regulation 19 SA Report

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The conclusions below are based on the best available information, including information that is publicly available. No attempt to verify these secondary data sources has been made and they have been assumed to be accurate as published.

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Acronyms & abbreviations

A&E	Accident and Emergency
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty (National Landscape)
AQMA	Air Quality Management Area
BHL	Building for a Healthy Life
BI	Blue Infrastructure
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environmental Assessment Method
CA	Conservation Area
CAMS	Catchment Abstraction Management Strategy
CCC	Committee on Climate Change
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DLUHC	Department for Levelling Up, Housing and Communities
DM	Development Management
DWMP	Drainage and Wastewater Management Plans
EA	Environment Agency
EIA	Environmental Impact Assessment
ELNA	Employment Land Needs Assessment
EU	European Union
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographical Information System
GP	General Practitioner
GTAA	Gypsy and Traveller Accommodation Assessment
GTTS	Gypsies, Travellers and Travelling Showpeople
ha	Hectare
HAZ	Heritage Action Zone
HER	Historic Environment Record
HGV	Heavy Goods Vehicle
HMO	Houses in Multiple Occupation
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IRZ	Impact Risk Zone
KCC	Kent County Council
LAA	Land Availability Assessment
LCA	Landscape Character Assessment
LDO	Local Development Order
LHN	Local Housing Need
LNR	Local Nature Reserve
LSOA	Lower Super Output Areas
LTP	Local Transport Plan
LWS	Local Wildlife Site
MCZ	Marine Conservation Zone
MEAS	Medway Estuary and Swale

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MHCLG	Ministry of Housing, Communities and Local Government
MLP	Medway Local Plan
MSA	Mineral Safeguarding Area
NHS	National Health Service
NIA	Nature Improvement Areas
NNR	National Nature Reserve
NO_2	Nitrogen Dioxide
NPPF	National Planning Policy Framework
NTS	Non-technical Summary
OMH	Open Mosaic Habitat
ONS	Office for National Statistics
OS	Ordnance Survey
PPG	Planning Practice Guidance
PPP	Policies, Plans and Programmes
PRoW	Public Rights of Way
RBMP	River Basin Management Plan
RIGS	Regionally Important Geodiversity Site
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAMMS	Strategic Access Management and Monitoring Scheme
SDO	Spatial Delivery Option
SEA	Strategic Environmental Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
STA	Strategic Transport Assessment
SuDS	Sustainable Drainage System
TE2100	Thames Estuary 2100 (Plan)
UNFCCC	United Nations Framework Convention on Climate Change
WCS	Water Cycle Study
WNA	Waste Needs Assessment
WRMP	Water Resources Management Plan
WwTW	Wastewater Treatment Works

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1 Introduction

1.1 Purpose of this report

1.1.1 Lepus Consulting Ltd (Lepus) has been instructed by Medway Council to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA), for the Medway Local Plan (MLP) 2026/27–2040/41.

1.1.2 This Regulation 19 SA Report has been prepared to present details of the SA process to date and inform Medway Council's preparation of the MLP. Principal purposes of the SA process include those shown in **Figure 1.1**.

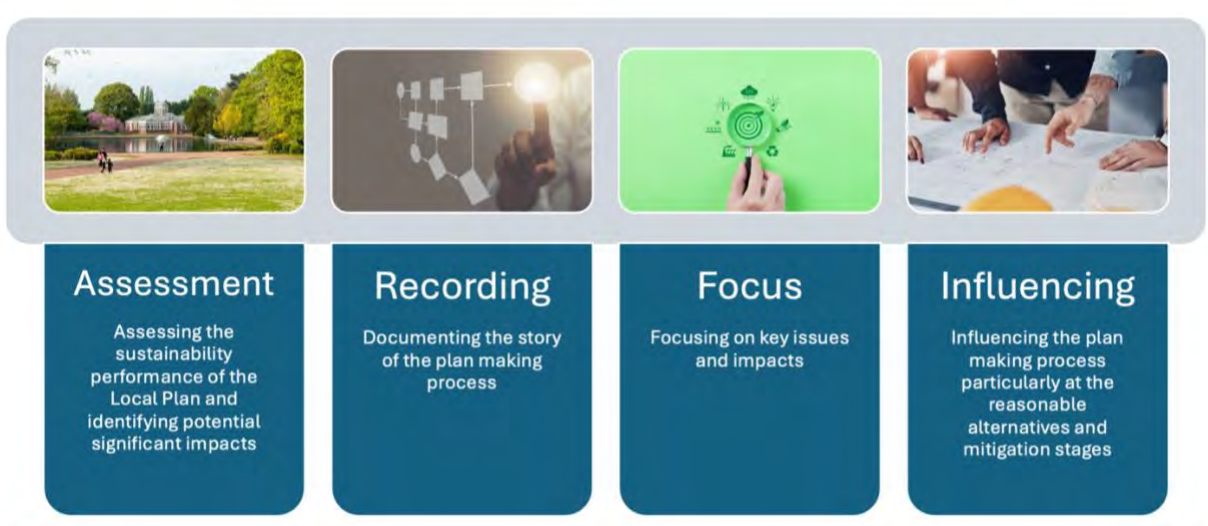

Figure 1.1: *Some key purposes of the SA process*

1.1.3 This SA report is one of a series of reports that have been prepared to present a record of the iterative SA process. Such an approach enables the Council to demonstrate that it has identified, described and evaluated reasonable alternatives during the making of the Local Plan. **Chapter 2** provides further details of the SA process to date.

1.2 Sustainability Appraisal

1.2.1 A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies[1]. The role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

[1] DLUHC and MHCLG (2025) Government guidance on plan making. Available at: https://www.gov.uk/guidance/plan-making [Date accessed: 29/04/25]

1.2.2 The SA process provides an opportunity to consider ways by which the plan can contribute to sustainable development, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that plan proposals are appropriate when compared to reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the development of the plan.

1.3 Strategic Environmental Assessment

1.3.1 Strategic Environmental Assessment (SEA) seeks to ensure that environmental considerations are part of the process of preparing certain plans and programmes. Its purpose is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development. SEA considers only the environmental effects of a plan, whereas sustainability appraisal considers the plan's wider economic and social effects in addition to its potential environmental impacts[2].

1.3.2 In the SEA procedure, an environmental report is prepared in which the likely significant effects on the environment of the proposed plan or programme and its reasonable alternatives are identified. The public and relevant environmental authorities are informed and consulted on the draft plan or programme and the environmental report.

1.4 Integrated approach to SA and SEA

1.4.1 The SEA Directive applies to a wide range of public plans and programmes, including land use plans (see Article 3(2)) of the SEA Directive[3]). The Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations, SI no. 1633[4]).

1.4.2 SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making. The SEA Directive and SEA Regulations require an environmental report in which the likely significant effects on the environment are identified for local plan proposals and reasonable alternatives.

1.4.3 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19 (5) of the Planning and Compulsory Purchase Act 2004 and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012.

1.4.4 This Regulation 19 SA Report has been prepared to meet the requirements of an SEA Environmental Report.

[2] DLUHC and MHCLG (2020) Strategic environmental assessment and sustainability appraisal. Available at: https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal [Date accessed: 29/04/25]

[3] Directive 2001/42/EC of the European Parliament of the Council of 27 June 2001 (SEA Directive). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042 [Date accessed: 29/04/25]

[4] The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: http://www.legislation.gov.uk/uksi/2004/1633/contents/made [Date accessed: 29/04/25]

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1.4.5 The MLP is at the plan-making stage Regulation 19, known as 'Publication' in the Local Plan Regulations 2012[5], as shown in Stage C of **Figure 1.2**.

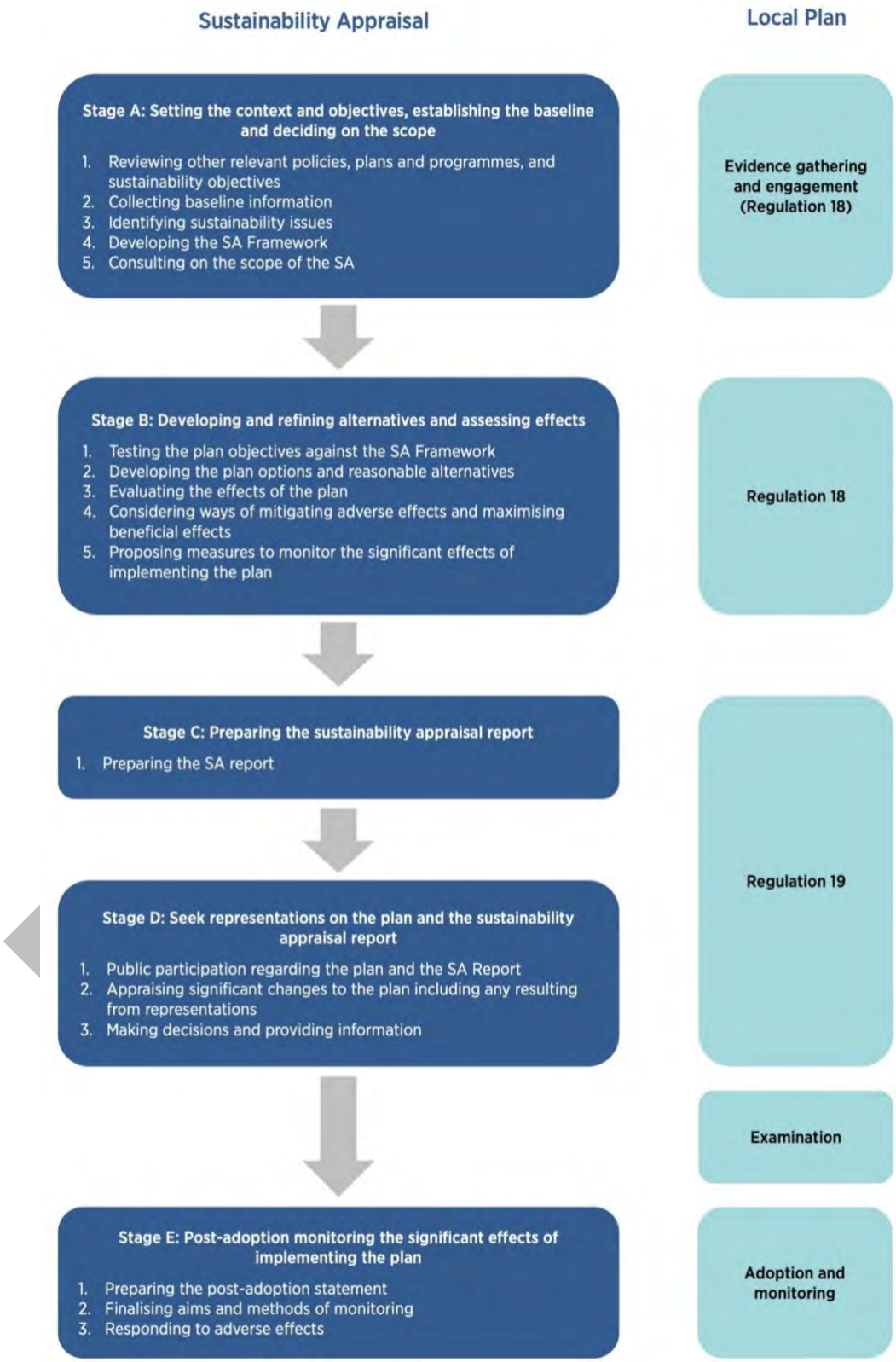

Figure 1.2: *Sustainability appraisal process alongside local plan stages*

[5] The Town and Country Planning (Local Planning) (England) Regulations 2012. SI 767.

1.5 Legislative context

1.5.1 When submitting their local plan to the Secretary of State, section 19(5) of the Planning and Compulsory Purchase Act[6] requires that local planning authorities (LPAs) must have prepared and be able to submit an SA at the same time.

1.5.2 The Environmental Assessment of Plans and Programmes Regulations[7] (SEA Regulations) require that Strategic Environmental Assessments (SEA) be prepared for a wide range of plans and programmes, including Local Plans.

1.5.3 Planning Practice Guidance (PPG) advocates that the SA process should integrate the requirements of the SEA Regulations. On this basis, this SA report incorporates the requirements of the SEA regulations.

1.5.4 PPG on SEA and SA[8] states: "*Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'). Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues*".

1.6 How to read and understand the R19 SA Report

1.6.1 This report should be read alongside the Regulation 19 Publication Version (2025) of the Medway Local Plan. The various appendices provide essential contextual information to the main body of the report. The contents of this SA Report are as follows:

- **VOLUME 1: Non-Technical Summary** provides a summary of the Regulation 19 SA work.
- **VOLUME 2: Main SA Report** (this document)
  - **Chapter 1** presents an introduction to this report.
  - **Chapter 2** sets out information about the MLP and the SA process to date.
  - **Chapter 3** presents the evolution of the environment without the MLP.
  - **Chapter 4** sets out the SA methodology.
  - **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
  - **Chapter 6** presents details on the preferred approach as set out in the MLP.
  - **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic.
  - **Chapter 16** summarises the cumulative effects identified.
  - **Chapter 17** sets out a range of monitoring recommendations for the MLP.
  - **Chapter 18** summarises ways in which the SA has influenced the MLP throughout the plan making process, including through recommendations made in the SA.
  - **Chapter 19** outlines the conclusions, residual effects and next steps.

[6] Planning and Compulsory Purchase Act 2004. Available at: www.legislation.gov.uk/ukpga/2004/5/contents [Date accessed: 29/04/25]

[7] The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: www.legislation.gov.uk/uksi/2004/1633/contents/made [Date accessed: 29/04/25]

[8] MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal [Date accessed: 29/04/25]

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- **VOLUME 3: Appendices**
  - **Appendix A** presents a review of other relevant policies, plans and programmes (PPPs).
  - **Appendix B** presents the SA Framework.
  - **Appendix C** summarises the consultation responses received during each stage of the SA process.
  - **Appendix D** presents the assessment of two additional growth options (overall quantum of growth) identified since the Regulation 18 stage.
  - **Appendix E** sets out the topic-specific methodology and assumptions applied in the evaluation of reasonable alternative sites.
  - **Appendix F** presents the assessment of reasonable alternative strategic development sites.
  - **Appendix G** presents the assessment of reasonable alternative non-strategic development sites.
  - **Appendix H** presents the assessment of MLP strategic, thematic and development management (DM) policies.
  - **Appendix I** considers the mitigating influence of MLP policies on reasonable alternative development sites and presents the post-mitigation site assessments.
  - **Appendix J** sets out the Council's outline reasons for selection or rejection of each reasonable alternative site considered throughout the SA process.
  - **Appendix K** presents the assessment of MLP site allocation policies.

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2 Sequencing of the MLP and SA process

2.1 Geography of the Plan area

2.1.1 Medway is a unitary authority in Kent in the south east of England, covering approximately 26,906ha, with a population estimate of 286,800 for the mid-year of 2023[9]. Medway is situated where the River Medway meets the Thames Estuary, and is characterised by a mix of urban areas, industrial zones, and picturesque and remote countryside including a section of the Kent Downs Area of Outstanding Natural Beauty (AONB) / National Landscape in the south and the rural Hoo Peninsula in the north.

2.1.2 Medway is distinctive for its five historic towns, waterfront regeneration, and dramatic landscapes, with juxtapositions of the natural environment with modern infrastructure and commercial life. Owing to its strategic location in the south east, Medway has strong links to London, and forms part of the Thames Estuary Corridor regeneration programme that seeks to boost the economy and infrastructure delivery including nationally significant projects such as the Lower Thames Crossing, near Gravesend.

2.1.3 **Figure 2.1** shows the Medway Council boundary, which comprises the Plan area for the MLP. The five main towns of Rochester, Chatham, Gillingham, Strood and Rainham each have their own distinctive characters, with notable heritage features. The majority of Medway's service provision, including three universities, are located within these towns. A network of smaller towns and villages also lie within the authority area. Alongside built heritage, Medway also supports a number of designated European sites which are rich in biodiversity, in particular the wetlands and marshes within the Hoo Peninsula and around the estuaries.

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[9] Kent Analytics (2024). 2023 Mid-year population estimates: Total population in Kent. Available at: www.kent.gov.uk/__data/assets/pdf_file/0018/14724/Mid-year-population-estimates-total-population-of-Kent-bulletin.pdf [Date accessed: 03/01/25]

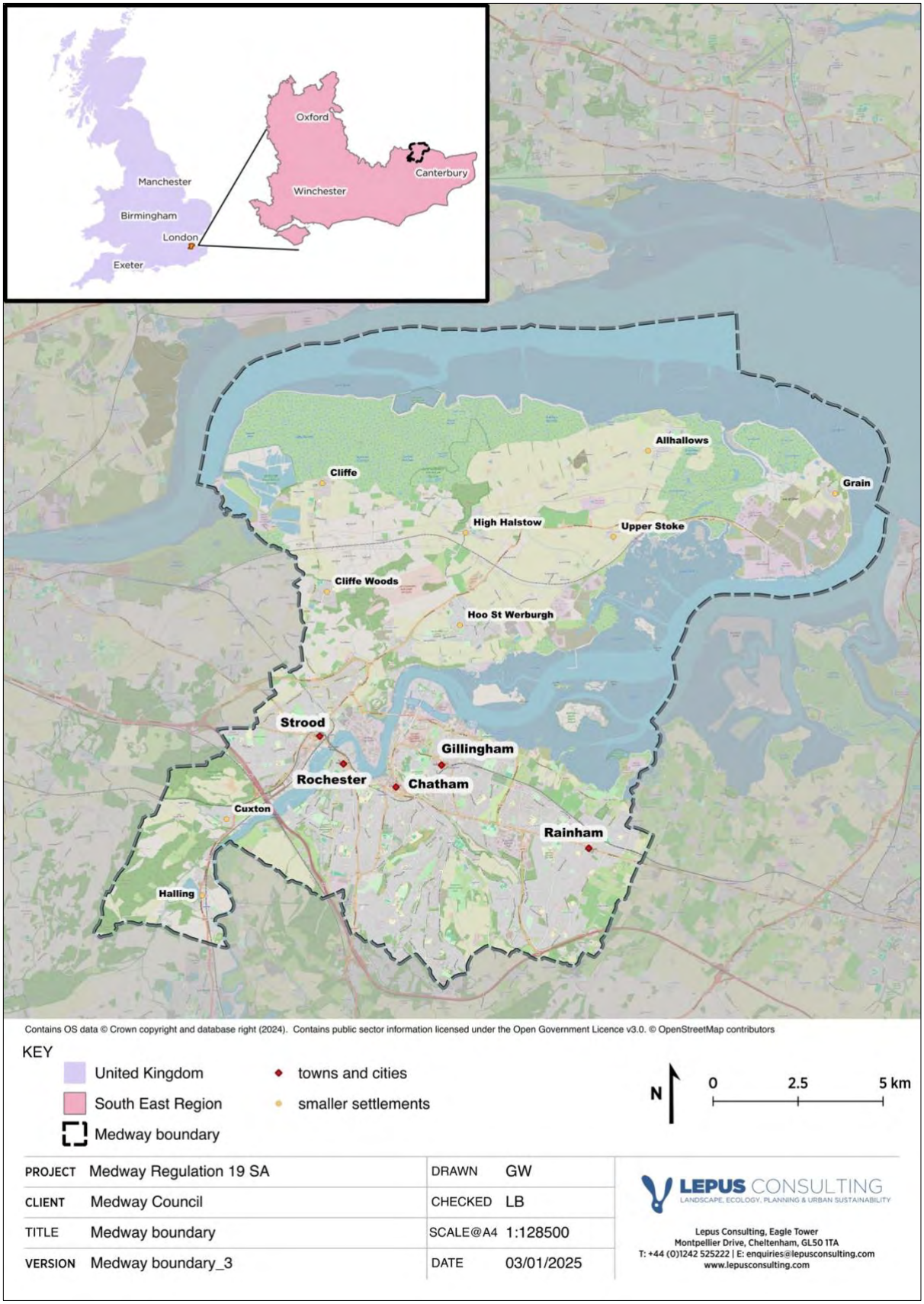

Figure 2.1: *Medway Local Plan area*

2.2 The Medway Local Plan

2.2.1 The Medway Local Plan (MLP) sets out the overall strategy for development in Medway Council for the Plan period 2026/27 to 2040/41, providing a framework for where and how new development can take place.

2.2.2 The MLP aims to strengthen Medway's position in the economy and culture of the region, connected to its surrounding coast and countryside, with a thriving economy, where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets.

2.2.3 The strategic objectives of the Plan are built around the components of economic, social and environmental sustainability, with a cross-cutting aim for infrastructure investment and the development of an intrinsic value which boosts pride in the local area.

2.2.4 **Table 2.1** below presents a timeline of stages of the MLP and SA process so far. To date, this represents Stages A, B and C of **Figure 1.2**.

Regulation 18 Consultation (2023)

2.2.5 An initial Regulation 18 Consultation document 'setting the direction for Medway' was prepared by Medway Council and published for consultation between 18th September and 31st October 2023[10]. The public and stakeholders were given the opportunity to voice their views on the topics and issues the MLP should cover, including:

- key themes;
- priorities and vision;
- improvements to the local environment;
- support for communities;
- how to strengthen the economy;
- how to regenerate the urban centres and riverside sites; and
- potential development in suburban and rural areas.

2.2.6 The consultation did not detail policies or identify sites for new development, or identify any reasonable alternatives.

2.2.7 Comments received during the 2023 Regulation 18 consultation were used by the Council to help inform the plan-making process and the following SA stages.

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[10] Medway Council (2023) Setting the direction for Medway 2040. Available at: www.medway.gov.uk/info/200542/medway_local_plan_2040/1823/setting_the_direction_for_medway_2040 [Date accessed: 29/04/25]

Regulation 18 Consultation (2024)

2.2.8 Following the 2023 consultation, a further Regulation 18 consultation was carried out between 15th July and 8th September 2024[11]. The consultation built on the responses to the previous consultation 'setting the direction for Medway'. The purpose of this consultation was to give the public and stakeholders the opportunity to provide feedback on proposed policies and aspects of the emerging Local Plan. This included reviewing potential development sites and three spatial growth options, which were outlined in a draft policies map to inform the preparation of the plan's content.

Regulation 19 Publication Consultation (2025)

2.2.9 The Regulation 19 consultation will provide the public and stakeholders with the opportunity to review the final draft of the Local Plan. The consultation period will last 6 weeks and stakeholders will comment on the 'soundness' and 'legal compliance' of the Plan. The Regulation 19 stage will prepare the plan for submission to the Planning Inspectorate for independent examination (Regulation 22). The information within the Local Plan will include the updated policies and reasonable alternatives that have been evaluated throughout the plan making process.

2.2.10 Once adopted, the MLP will form part of the statutory development plan for Medway, replacing and updating the current Medway Local Plan, which was adopted in 2003[12].

2.3 Sustainability Appraisal alongside the MLP stages: Iteration

2.3.1 **Table 2.1** provides a summary of the main plan making stages and includes SA outputs that were prepared at each stage.

2.3.2 The preparation of a Scoping Report was the first phase of the SA process, which set the criteria for assessment (including the SA Objectives) and established the baseline data and other information, including a review of relevant policies, programmes and plans (PPPs). The scoping process involved an overview of key issues, highlighting areas of potential conflict. The output of the scoping phase was the SA Scoping Report prepared in 2023[13].

2.3.3 The SA Scoping Report was published for consultation alongside the high-level Regulation 18 MLP document 'Setting the Direction for Medway 2040', including with the statutory bodies (Natural England, Historic England and the Environment Agency), between 18th September and 31st October 2023. Comments received at this stage from the statutory bodies and the Kent Downs AONB Unit were used to inform the preparation of the Regulation 18 SA, as summarised in **Appendix C**.

[11] Medway Council (2024) Regulation 18 Consultation. Available at: https://www.medway.gov.uk/info/200542/medway_local_plan_2041/1823/medway_local_plan_regulation_18_consultation_2024 [Date accessed: 14/01/25]

[12] Medway Council (2003) Medway Local Plan. Available at: https://www.medway.gov.uk/info/200149/planning_policy/146/current_planning_policies/3 [Date accessed: 29/04/25]

[13] Lepus Consulting (2023) Sustainability Appraisal of the Medway Local Plan: Scoping Report, September 2023. Available at: https://www.medway.gov.uk/downloads/file/8412/sustainability_appraisal_of_the_medway_local_plan_-_scoping_report_2023 [Date accessed: 29/04/25]

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2.3.4 The Regulation 18 Interim SA Report (2024)[14] was consulted on between 15th July and 8th September 2024 with statutory consultees, other stakeholders and the general public. The SA Report included an assessment of reasonable alternatives, or 'options', set out in the Medway Local Plan Regulation 18 2024 consultation document. These related to options for growth, spatial delivery options, policies and reasonable alternative sites. Comments received during the consultation relating to the SA were considered during the preparation of this Regulation 19 SA Report, and are also summarised in **Appendix C**.

2.3.5 This Regulation 19 SA Report draws on the information gathered and the evaluation carried out during the SA process to date, and presents the assessment of updated MLP policies and new/amended reasonable alternatives that have come forward since the Regulation 18 stage. This report also provides the Council's updated outline reasons for selecting and rejecting reasonable alternative sites and options, taking the latest evidence into account.

2.3.6 **Figure 2.2** summarises the timeline of stages of the MLP and SA process so far, as discussed above. To date, this represents Stages A, B and C of **Figure 1.2**.

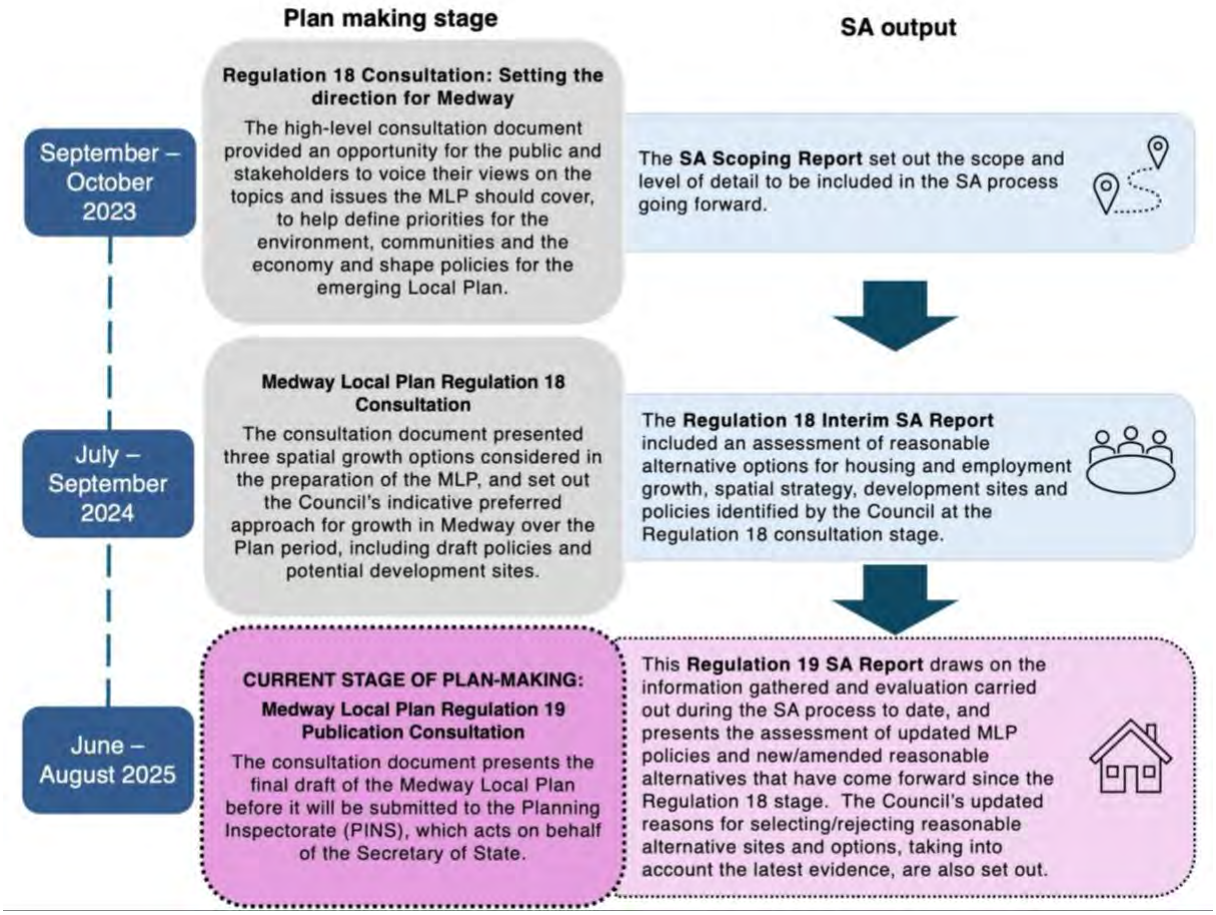

Figure 2.2: *The MLP and SA process so far*

[14] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 29/04/25]

2.4 Meeting the requirements of the SEA Regulations

2.4.1 There are certain requirements that this report must satisfy in order for it to qualify as an 'environmental report', as set out in the SEA Regulations. These requirements, and where in the report they have been met, are presented in **Figure 2.3**.

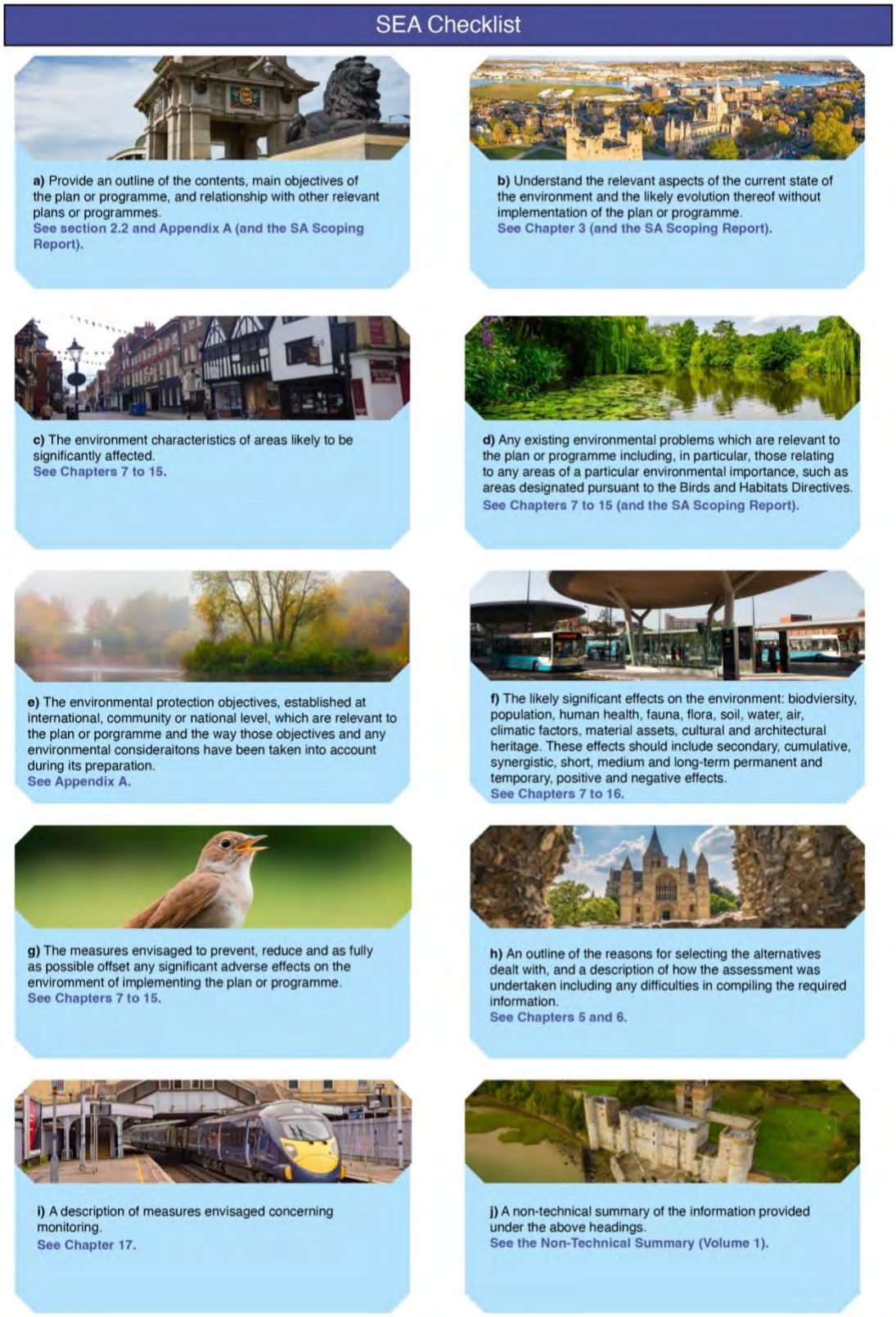

Figure 2.3: *SEA checklist*

3 Evolution of the environment without the MLP

3.1 Overview

3.1.1 The SEA Regulations requires the Environmental Report to present *"information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme".*

3.1.2 Without the MLP, no new plan-led development would occur within the Medway area over and above that which is currently proposed in the adopted Medway Plan 2003[15]. In this scenario, an appeal-led system would predominate. The nature and scale of development that may come forward under an appeal-led system is uncertain. However, in a 'no plan' scenario, other plans and policies would continue to be a material consideration in planning decisions and legislative protection would continue to be in place.

3.1.3 **Table 3.1** considers the likely evolution of the baseline within Medway in the absence of the MLP, considering information gathered at the Scoping stage as well as more up-to-date data and statistics.

Table 3.1: *Likely evolution without the MLP*

Theme	Likely evolution of the environment without the MLP
Air	• Primary sources of air pollution in the UK include road transport, industry, imports and agriculture. These sources will not be expected to change. • Congestion issues around Rochester, Chatham, Rainham, Strood and Gillingham, and on the A228 near Hoo, could potentially be exacerbated due to a rising population. Medway is also affected by development outside the boundary, for example, implications of the proposed Lower Thames Crossing, development in neighbouring authority areas, and key junctions in the wider area. Traffic and congestion can have implications for air quality, human health and wildlife, especially those within 200m of main roads. • There are four AQMAs within and around Medway and the principal pollutant affecting air quality is nitrogen dioxide (NO_2), mostly sourced from road traffic. Continuing to monitor air quality, especially within AQMAs, and implementation of measures outlined in Air Quality Action Plans will ensure that objectives are in place to decrease exceedances over time. • National trends suggest there is an increasing uptake of lower emission vehicle types, such as electric cars, which will be likely to help limit road transport associated emissions in the MLP area and will be likely to further improve air quality.
Biodiversity, Flora and Fauna	• Sites designated for their national and international biodiversity and/or geodiversity value will continue to benefit from legislative protection. • Long-term prospects for protecting and enhancing the wealth of habitats and species in the area, and for further developing the existing Green Infrastructure network, would be reduced without a strong policy framework being established in the Plan. • It is uncertain if development will be placed near locally designated sites without the introduction of the Plan. Without the Plan, it may be difficult to help ensure that development is not of a type, scale and location that could potentially have a major adverse impact on either a biodiversity or geodiversity designation (of international, national or local significance) or on the functioning ecological network of the Plan area and the various essential ecosystem services this provides.

[15] Medway Council. Medway Local Plan 2003. Available at: www.medway.gov.uk/downloads/file/2400/medway_local_plan_2003 [Date accessed: 29/04/25]

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Theme	Likely evolution of the environment without the MLP
Climatic Factors	• Carbon dioxide (CO_2) emissions in the transport sector may be likely to rise in line with local trends. An increasing uptake of electric vehicles, a trend seen across the UK, may help to alleviate these issues. • The risk of flooding will be likely to increase over time due to the changing climate, increasing the occurrence of extreme weather events. • The risk of surface water flooding will depend on the size, nature and extent of non-porous built surface cover in the future, and the effectiveness of the existing drainage system. • Total carbon emissions are expected to continue to decrease over the longer term as renewable energy becomes an increasingly competitive force in the UK energy market. • Technological advances, which may include renewable energies, electric vehicles, and efficient electricity supplies, will be expected to occur. • The lack of a planned growth strategy could lead to increased carbon emissions as development may be less likely to be in sustainable locations.
Cultural Heritage	• National and local guidance seeks to protect designated assets and their settings such as Listed Buildings, Conservation Areas, Scheduled Monuments, and Registered Parks and Gardens. • The Heritage at Risk Register will continue to be managed by Historic England who will continue to work with stakeholders to protect these assets. • Further heritage assets are likely to be identified in the future, with or without the MLP. • It is uncertain if connectivity with places, local distinctiveness and culture would be emphasised and protected in the absence of the MLP as it is anticipated that the MLP will require a Heritage Statement and/or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.
Human Health	• The population across Medway is expected to continue to increase. This is likely to place greater pressure on the capacity of key services and amenities, including health and leisure facilities and housing. • The life expectancy of men and women is anticipated to rise over time, leading to an increasingly aging population. • Some residents will continue to need to travel relatively far, likely by driving, to reach important health facilities and services. • Dependent on behavioral patterns in society and the future policy approach to the concentration of late-night activities, the spatial patterns of higher crime in the town centres seem likely to continue. • There could potentially be a rise in homelessness due to an unmet housing need. • Noise pollution from Rochester Airport and existing and new main roads is likely to remain a long-term issue.
Landscape	• The London Green Belt will continue to benefit from legislative protection. • The extent to which development will seek to conserve and enhance the character of local landscape and townscapes is uncertain. In the absence of MLP-led development, there could potentially be a rise in the quantity of new development which discords with the local character by altering the style and scale of development.

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Theme	Likely evolution of the environment without the MLP
Population and Material Assets	• The population of Medway is expected to continue to increase, which will be likely to result in secondary effects. Some of these secondary effects could include effects on health, education and social inequalities due to poorer accommodation and the potential for fewer sustainable travel choices being available. • Energy consumption in all sectors is expected to increase. • There will be less planning control over the location of future development sites, with potential for planning applications for new homes being allowed in unsustainable locations and/or without necessary supporting infrastructure. • There is the potential for the required infrastructure to support further growth not being delivered and for more dispersed patterns of development which could occur without a plan, both of which could increase the proportion of the population with poor access to services.
Soil	• Soil is a non-renewable resource that will be likely to continue to be lost. • Rates of soil erosion and loss of soil fertility will be likely to continue to rise due to the impacts of agriculture and climate change.
Water	• Without the MLP, there could potentially be less control over the location and scale of new developments with potential to result in over-capacity issues at wastewater treatment works (either cumulatively or individually). • In the absence of MLP-led development, the efficiency and sustainability of water consumption may be unlikely to improve owing to the likely increase in population and associated water demand, depending on the nature of any future changes to national regulations, such as the Building Regulations and any emerging policy / regulations relating to water neutrality. • Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the Thames and south east RBMPs, WRMP and CAMS in line with the EU Water Framework Directive.

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4 Methodology

4.1 Scope of the Sustainability Appraisal

4.1.1 The purpose of the SA Scoping Report is to establish the scope of the sustainability appraisal. It includes information about:

- Relevant plans, programmes and their environmental objectives which may have a bearing on the SA of the MLP (see **Appendix A** for further information);
- Baseline information;
- Environmental issues and problems; and
- The SA Framework (see **Appendix B**).

4.1.2 The SA Scoping Report for the MLP was prepared by Lepus in 2023[16]. The Scoping Report was subject to a consultation between 19th September and 31st October 2023 with the statutory consultees (Natural England, Historic England and the Environment Agency).

4.1.3 **Appendix C** presents a summary of comments received during each stage of consultation on the SA, including the Scoping Report.

4.1.4 The appraisal uses objective geographic information relating to environmental receptors, the SA Framework and established standards (where available) to help make the assessment decisions transparent and robust.

4.1.5 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations[17]. The SA Objectives and the SEA Topics to which they relate are set out in **Table 4.1**.

4.1.6 Each SA Objective is considered when appraising MLP site allocations, policies and reasonable alternatives. The order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

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[16] Lepus Consulting (2023) Sustainability Appraisal of the Medway Local Plan: Scoping Report, September 2023. Available at: www.medway.gov.uk/downloads/file/8412/sustainability_appraisal_of_the_medway_local_plan_-_scoping_report_2023 [Date accessed: 10/01/25]

[17] Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including "*issues such as (a) biodiversity, (b) population,(c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)*."

Table 4.1: *Summary of the SA Objectives*

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	**Climate Change Mitigation:** Minimise Medway's contribution to climate change.	Climatic factors
2	**Climate Change Adaptation:** Plan for the anticipated impacts of climate change.	Climatic factors, soil, water
3	**Biodiversity and Geodiversity:** Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of Medway.	Biodiversity, flora and fauna
4	**Landscape and Townscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	Landscape and cultural heritage
5	**Pollution and Waste:** Reduce waste generation, increase the reuse and recycling of materials whilst minimising the extent and impacts of water, air and noise pollution.	Air, water, soil, human health and material assets
6	**Natural Resources:** Protect, enhance and ensure the efficient use of Medway land, soils and water.	Soil, water and material assets
7	**Housing:** Provide a range of housing to meet the needs of the community.	Population
8	**Health and Wellbeing:** Safeguard and improve the physical and mental health of residents.	Population and human health
9	**Cultural Heritage:** Conserve, enhance and manage sites, features and areas of historic and cultural importance.	Cultural heritage
10	**Transport and Accessibility:** Improve the choice and efficiency of sustainable transport in Medway and reduce the need to travel.	Climatic factors and material assets
11	**Education:** Improve education, skills and qualifications in Medway.	Population
12	**Economy and Employment:** Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	Population and material assets

4.2 Best practice guidance

4.2.1 Government policy recommends that both SA and SEA are undertaken under a single SA process, which incorporates the requirements of the SEA Regulations. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment[18].
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive[19].
- Ministry of Housing, Communities & Local Government (MHCLG) (2024) National Planning Policy Framework (NPPF)[20].
- Department for Levelling Up, Housing and Communities (DLUHC) and MHCLG (2024) Planning Practice Guidance (PPG)[21].
- Royal Town Planning Institute (RTPI) (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans[22].

4.3 Appraisal process

4.3.1 The purpose of this document is to provide an appraisal of the MLP including reasonable alternatives in line with Regulation 12 of the SEA Regulations[23] which states that:

4.3.2 *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report … [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*

4.3.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 4.1**).

[18] European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 29/04/25]

[19] Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date accessed: 29/04/25]

[20] MHCLG (2024) National Planning Policy Framework, December 2024. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Date accessed: 29/04/25]

[21] DLUHC & MHCLG (2024) Planning practice guidance. Available at: https://www.gov.uk/government/collections/planning-practice-guidance [Date accessed: 29/04/25]

[22] RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: https://www.rtpi.org.uk/practice-rtpi/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/ [Date accessed: 29/04/25]

[23] The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: https://www.legislation.gov.uk/uksi/2004/1633/contents/made [Date accessed: 29/04/25]

Box 4.1: *Schedule 1 of the SEA Regulations*[24]

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets out a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
    - special natural characteristics or cultural heritage;
    - exceeded environmental quality standards or limit values;
    - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

4.4 Impact assessment and determination of significance

4.4.1 Significance of effect is a combination of the sensitivity of receptors and the magnitude of anticipated impacts. Sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

Sensitivity

4.4.2 Sensitivity has been measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and, for example, if impacts will affect designated areas or landscapes.

4.4.3 A guide to the range of scales used in determining sensitivity is presented in **Table 4.2**. For most receptors, sensitivity increases with geographic scale.

[24] The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: https://www.legislation.gov.uk/uksi/2004/1633/contents/made [Date accessed: 29/04/25]

***Table 4.2:** Impact sensitivity*

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

Magnitude

4.4.4 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 4.3**).

***Table 4.3:** Impact magnitude*

Impact magnitude	Typical criteria
High	• Likely total loss of or major alteration to the receptor in question; • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

4.5 Significant effects

4.5.1 A single value from **Table 4.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.

4.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations[25], where feasible, which states that the effects should include: "*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

Table 4.4: *Guide to scoring significant effects*

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a development proposal would be likely to: • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	• The size, nature and location of development proposals would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a development proposal would be likely to: • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal would be likely to: • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

4.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects in terms of the relevant SA Objective, the precautionary principle[26] has been used. This is a worst-case scenario approach; if a positive effect is identified in relation to one criterion (see the second column of the SA Framework in **Appendix B**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts provide only an indicative summary, and the accompanying assessment text provides a fuller explanation of the sustainability performance of the option.

[25] The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: https://www.legislation.gov.uk/uksi/2004/1633/contents/made [Date accessed: 29/04/25]

[26] The European Commission describes the precautionary principle as follows: "*If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human,*

4.5.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).

4.5.5 Significance of effect has been categorised as minor or major. **Table 4.4** sets out the significance matrix and explains the terms used to evaluate each reasonable alternative or proposal against each SA Objective of the SA Framework. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.

4.5.6 It is important to note that the assessment scores presented in **Table 4.4** are high level indicators. The assessment narrative text should always read alongside the significance scores. Likely impacts are not intended to be summed.

4.5.7 A number of topic-specific methodologies and assumptions have been applied to the appraisal process for reasonable alternative sites against each of the SA Objectives (see **Appendix E**). These should be borne in mind when considering the assessment findings.

4.6 Limitations of predicting effects

4.6.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

4.6.2 The assessments in this report are based on the best available information, including secondary data obtained from the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

4.6.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.

4.6.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. Additionally, the appraisal of the MLP is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects. Information regarding the capacity of infrastructure such as healthcare and education has not been available to inform the SA, to determine how this may influence accessibility, although ongoing evidence gathering is underway by Medway Council, for example in terms of modelling the healthcare impacts and needs against the current capacity.

animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered".

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5 Reasonable alternatives

5.1 Context

5.1.1 Regulation 12 of the SEA Regulations[27] states that: *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report … [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*

5.1.2 PPG[28] states that: *"Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made".*

5.1.3 The Council has therefore demonstrated how they have identified, described and evaluated reasonable alternatives as part of the plan making process within this SA Report (which includes the requirements of an SEA Environmental Report). The following sections of this chapter document the process of identifying and evaluating different types of reasonable alternative, when and where the Council considered reasonable alternatives, and how the SA influenced the preparation of the MLP.

5.2 Different types of reasonable alternatives

5.2.1 It is possible to derive reasonable alternatives for different aspects of a local plan. There is no prescribed formula or procedure about which aspects of a local plan require reasonable alternatives.

5.2.2 All reasonable alternatives have been identified by the Council. Reasonable alternatives have been identified through consultation and close working with stakeholders, including the most recent stakeholder comments in response to the Regulation 18 consultation. Furthermore, the identification of reasonable alternatives has been informed by national, regional and local policy context and the spatial portrait and key issues within Medway. The Statement of Community Involvement[29] details how the Council ensures that relevant public bodies, neighbouring authorities and other regional/local groups, as well as the general public, have opportunities to comment at different stages of the planning process. The Council has also made reference to past work on plan-making to assess potential options that could offer reasonable alternatives, but some were not found to be realistic due to changing circumstances.

[27] The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: https://www.legislation.gov.uk/uksi/2004/1633/contents/made [Date accessed: 29/04/25]

[28] MHCLG (2020) Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal. Available at: https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal [Date accessed: 29/04/25]

[29] Medway Council (2024). Medway Statement of Community Involvement. Available at: https://www.medway.gov.uk/downloads/file/9156/medway_statement_of_community_involvement_-_may_2024 [Date accessed: 13/06/25]

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5.2.3 In addition to a suite of draft policies assessed at Regulation 18 and finalised policies assessed at Regulation 19, a range of reasonable alternatives have been considered throughout the plan making process for different attributes of the MLP, as shown on **Figure 5.1**.

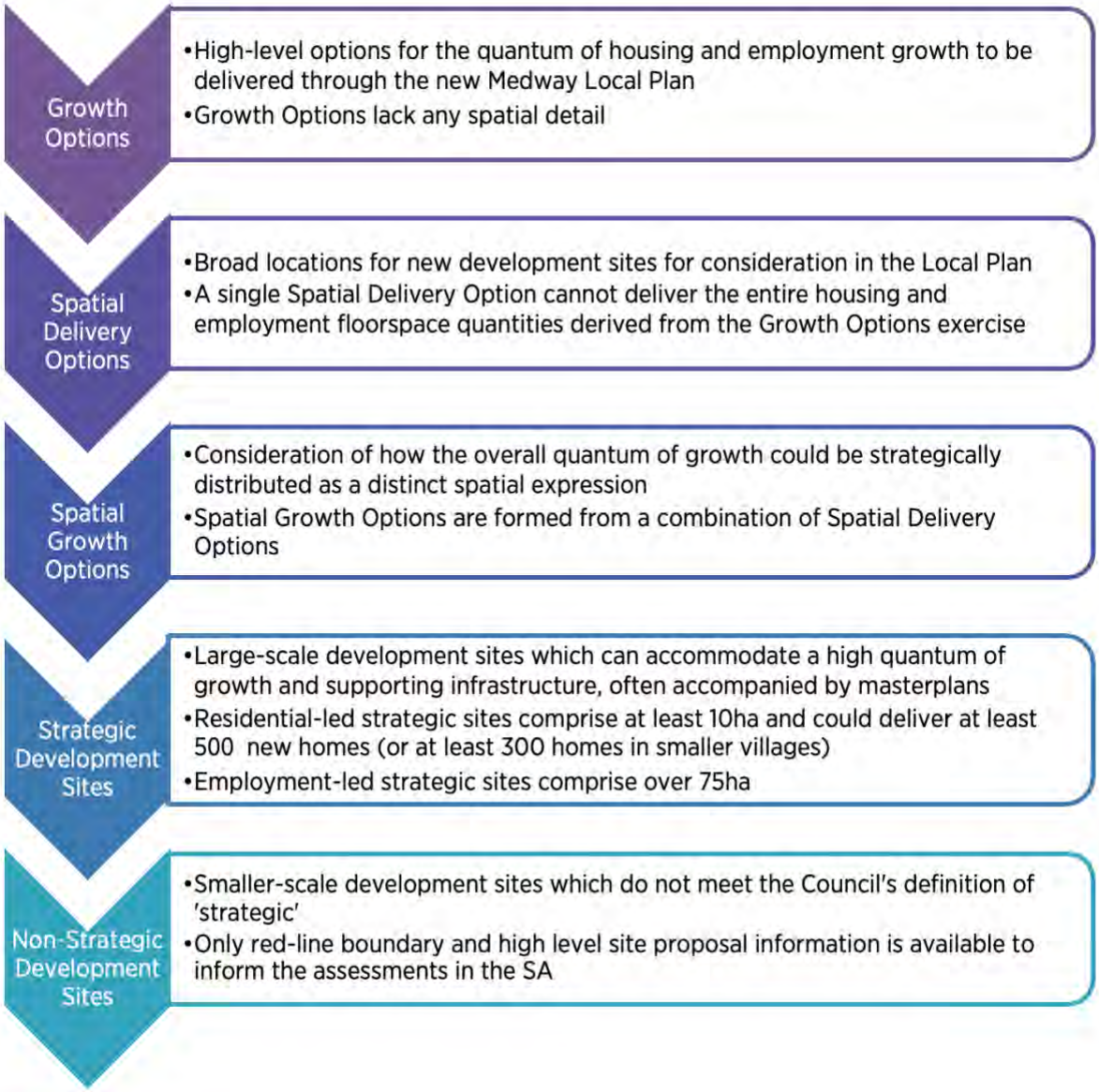

Figure 5.1: *Definitions of reasonable alternatives evaluated in the SA process*

5.2.4 **Figure 5.2** summarises the reasonable alternatives considered throughout the plan making process, and at which chronological stage of the SA process these alternatives have been identified, described and evaluated.

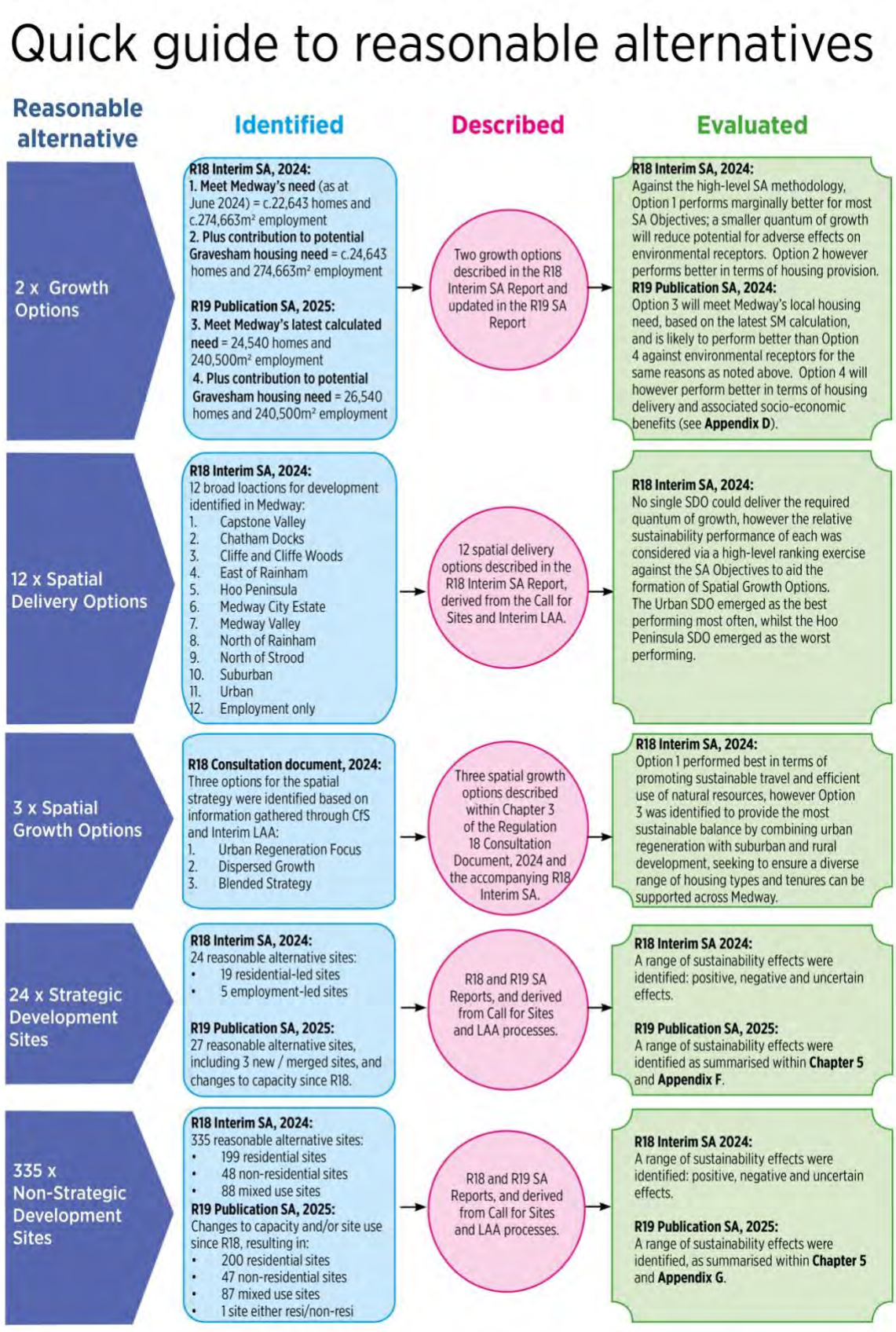

Figure 5.2: *The identification, description and evaluation of reasonable alternatives considered throughout the MLP process*

5.3 Growth options

5.3.1 Paragraph 62 of the NPPF[30] states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method outlined in PPG[31]. The NPPF also states "*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*".

Appraisal of growth options at Regulation 18 (June 2024)

5.3.2 Following careful consideration of the available evidence at the Regulation 18 stage of the Plan making process, as well as the environmental constraints which limit the extent of growth that is appropriate for the area, Medway Council identified two reasonable alternatives for the quantum of housing and employment growth to be delivered through the emerging Local Plan (see **Table 5.1**). These options were based on the latest evidenced needs for the Plan area at the time of writing, and the potential unmet housing needs of the neighbouring authority of Gravesham, noting that these unmet needs were not yet confirmed given Gravesham Borough Council's in-progress Local Plan Partial Review[32].

5.3.3 The assessment of the two growth options, as summarised in **Table 5.2**, is presented in full within the Regulation 18 Interim SA Report (2024)[33].

Table 5.1: *Growth options identified by Medway Council at the Regulation 18 stage*

Growth option	Description of growth option
Option 1	Meet Medway's Local Housing Need and Initial Objective Assessment of Employment Land Need (based on evidence at Regulation 18 stage). **Approximately 22,643 homes and 274,663m^2 employment land.**
Option 2	As for Option 1, plus meeting Gravesham's Unmet Housing Need. Initial consultation and duty to cooperate meetings with Gravesham Borough Council have identified a potential unmet housing need of 2,000 homes. **Approximately 24,643 homes and 274,663m^2 employment land.**

5.3.4 Environmental assessment needs to have details of size, nature and location of the proposals in order for impacts to be understood in relation to the environmental baseline. The housing options have only 'nature', in this case housing. The size and location details are not present, beyond the broad direction towards the existing urban area, which means that any attempt to evaluate impacts is necessarily high level with restricted diagnostic conclusions.

[30] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 29/04/25]

[31] DLUHC and MHCLG (2025) Planning Practice Guidance. Available at: https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments [Date accessed: 29/04/25]

[32] Gravesham Borough Council (2024) Planning Policy News: Gravesham Local Plan Partial Review. Available at: https://www.gravesham.gov.uk/planning-regeneration/consultations-news/3 [Date accessed: 29/04/25]

[33] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 29/04/25]

5.3.5 Opting for a larger quantum of development tends to result in greater potential for negative impacts on environmental sustainability objectives. Opting for a lower level of growth could help to reduce pressure on transport systems and social infrastructure. Considering these factors, Option 1 was identified as the best performing of the two options against the majority of SA Objectives. Conversely, Option 2 was identified as performing stronger against SA Objective 7 (housing) due to its proposal to deliver approximately 2,000 dwellings to address Gravesham Borough's potential unmet housing need, providing greater benefits regarding affordable housing and the provision of a suitable mix of housing. However, the two options are similar and were not found to perform significantly differently against the high-level SA methodology.

Appraisal of growth options at Regulation 19

5.3.6 The Regulation 18 consultation closed in September 2024. A new version of the NPPF was published in December 2024, alongside updated PPG. New housing figures were published, derived through the Standard Method, that sought to meet the government's aspirational target of building 1.5 million homes during this parliamentary term.

5.3.7 The latest Standard Method calculation for Medway is 1,636 dwellings per annum[34]. Across the proposed 15-year Plan period, this equates to a total housing need of 24,540 dwellings. In terms of employment needs, the 2025 Employment Land Needs Assessment (ELNA) identified a need for a minimum of 204,000 sqm of industrial floorspace and 36,500 sqm of office floorspace (totalling 240,500 sqm).

5.3.8 At the time of writing, Gravesham Borough Council's local plan evidence base is still in preparation and there has been no formal confirmation on the existence, or extent, of any unmet housing need. However, Medway Council's position remains that an approximate 2,000 home contribution to Gravesham's unmet needs via DtC is considered a reasonable alternative housing number.

5.3.9 **Table 5.2** presents two further reasonable alternative growth options which have been identified by Medway Council in response to the change in Standard Method housing number: Options 3 and 4. These options effectively update Options 1 and 2 as described above so that the latest calculated housing and employment need figures can be evaluated in the SA process. The full evaluation of these options can be found in **Appendix D**.

Table 5.2: *Growth options identified by Medway Council at the Regulation 19 stage*

Growth option	Description of growth option
Option 3	Meet Medway's Local Housing Need (based on latest standard method calculation) and Objective Assessment of Employment Land Need. **Approximately 24,540 homes and 240,500m^2 employment land.**
Option 4	As for Option 3, plus meeting Gravesham's Unmet Housing Need. Initial consultation and duty to cooperate meetings with Gravesham Borough Council have identified a potential unmet housing need of 2,000 homes. **Approximately 26,540 homes and 240,500m^2 employment land.**

[34] Turley (2025) The standard method of assessing housing need. Available at: https://www.turley.co.uk/sites/default/files/pdf/file/2025-05/turley_lpdf_-_revised_standard_method_analysis_may2025_0.pdf [Date accessed: 13/06/25]

5.3.10 In summary, all options tested in the SA process will meet the housing needs of Medway. Option 4 proposes the highest level of growth (totalling 26,540 dwellings) which would generally be expected to result in greater potential for adverse effects particularly in relation to environmental SA Objectives such as air quality, climate change, biodiversity, natural resources and landscape. This option would also be likely to present the greatest challenge with respect to capacity issues and pressure on existing services and infrastructure required to deliver the proposed levels of growth and meet the day-to-day needs of the population.

5.3.11 Option 3 will meet the latest calculated need based on the Standard Method calculation (1,636 dwellings per annum[35]); although, this option would not include any provisions to meet other authorities' needs, unlike Option 4.

5.3.12 However, at the time of writing there has been no formal confirmation on the existence, or extent, of any unmet housing need in Gravesham Borough or any other authority surrounding Medway. Given Medway's environmental and transport constraints, all options could lead to similar challenges in terms of accommodating the required level of growth whilst avoiding or minimising potential for adverse effects. Overall, Option 3 is identified as the best performing as it will meet the latest calculated housing and employment needs for Medway without risking compromising its environmental assets or social infrastructure via over-supply.

Selection and rejection of growth options

Comment from Council:
Gravesham Borough Council has notified Medway Council of an estimated unmet housing need of 2,000 homes through responses to consultations and duty to cooperate meetings. Medway Council has requested further information from Gravesham Borough Council to demonstrate the unmet housing need. Medway Council has not received an assessment of land availability from Gravesham Borough Council, therefore Option 2 and Option 4 cannot be justified. This matter is set out in a Statement of Common Ground.
Option 1 and Option 3 have been shown to perform better compared to Option 2 and Option 4. Option 3 is aligned with the direct output from the Standard Method as a starting point to determine local housing need. Therefore, Option 3 forms the basis of Medway Council's spatial strategy.

5.4 Spatial delivery options

5.4.1 Drawing on information gathered through Call for Sites exercises and the Interim Land Availability Assessment (LAA)[36] and sites promoted in response to the previous Regulation 18 consultation (2023), 12 'spatial delivery options' (SDOs) were identified by the Council. The assessment of the 12 SDOs is presented within Appendix B of the Regulation 18 (2024) Interim SA Report[37].

[35] Turley (2025) The standard method of assessing housing need. Available at: https://www.turley.co.uk/sites/default/files/pdf/file/2025-05/turley_lpdf_-_revised_standard_method_analysis_may2025_0.pdf [Date accessed: 13/06/25]

[36] Medway Council (2023) Land Availability Assessment Interim Report, October 2023. Available at: https://www.medway.gov.uk/downloads/file/8413/medway_land_availability_assessment_september_2023 [Date accessed: 29/04/25]

[37] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 29/04/25]

5.4.2 The SDOs were based on broad locations across Medway, apart from one which comprises sites for employment land uses only. The broad locations which form the SDOs cover a range of land use types, which could provide a mixture of sites including greenfield and rural development as well as opportunities for regeneration of brownfield land, in order to explore the relative benefits and challenges associated with growth in these areas across Medway.

5.4.3 The 12 SDOs and the likely range of homes that could theoretically be delivered through each SDO are presented in **Table 5.3**. No single SDO could deliver the required quantum of development and a combination of SDOs would be needed to form a spatial strategy. The SDOs vary in size and capacity, as shown in **Table 5.3** and on **Figure 5.3** where the indicative broad areas covered by each of the 12 SDOs can be seen; impacts may vary depending upon the specific development locations within the indicative SDO boundaries. Therefore, the relative sustainability performance of each SDO against each SA Objective has been considered in order to assist Medway Council in selecting and rejecting SDOs when forming a spatial strategy (see **section 5.5**).

Table 5.3: *Spatial delivery options identified by Medway Council*

Spatial delivery option	Minimum number of new homes	Maximum number of new homes
Capstone Valley	3,749	4,336
Chatham Docks	3,000	3,000
Cliffe and Cliffe Woods	2,079	2,406
East of Rainham	1,243	1,432
Hoo Peninsula	10,893	12,970
Medway City Estate	1,092	1,502
Medway Valley	1,264	1,457
North of Rainham	2,560	3,275
North of Strood	2,029	2,319
Suburban	495	779
Urban	7,719	8,542
Employment only	480ha of employment floorspace	480ha of employment floorspace

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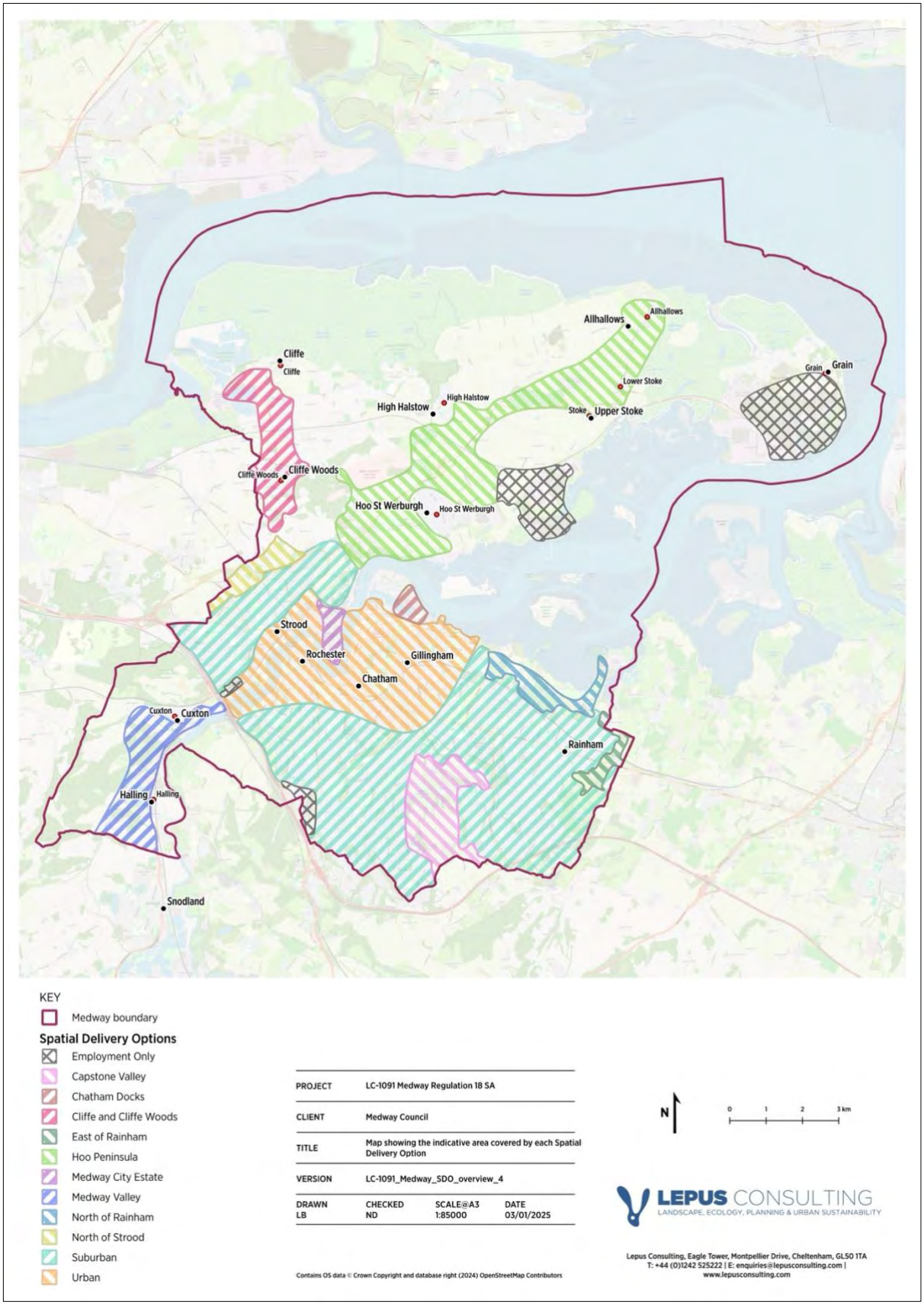

Figure 5.3: *Map showing the indicative broad areas covered by each Spatial Delivery Option*

5.4.4 **Table 5.4** summarises the SA findings. The assessments and ranking of SDOs are presented in full within the Regulation 18 (2024) Interim SA Report[38].

5.4.5 A combination of SDOs would be needed to form a spatial strategy and ensure a sustainable level of growth across Medway as a whole. Drawing on the assessment narrative and relative sustainability performance of the 12 SDOs against each SA Objective, the Urban SDO emerged as the best performing option the most often, ranking 1st against SA Objectives 8 (health), 10 (transport) and 12 (economy). The Suburban SDO and Chatham Docks SDO also performed relatively well, each ranking 1st against two SA Objectives (Suburban against SA Objectives 1 – climate change mitigation and 6 – natural resources and; and Chatham Docks for SA Objective 4 – landscape and 9 – cultural heritage), reflecting the greater potential for a 'brownfield first' approach to avoid or reduce environmental impacts.

5.4.6 The worst performing SDO was the Hoo Peninsula, ranking lowest against SA Objectives 1 (climate change mitigation), 3 (biodiversity), 5 (pollution), 6 (natural resources) and 8 (health), with potential adverse effects associated with the introduction of a large quantum of growth in isolated settlements and in proximity to sensitive ecological receptors.

Table 5.4: *Impact matrix of the spatial delivery options (extracted from the Regulation 18 Interim SA Report)*

	1	2	3	4	5	6	7	8	9	10	11	12
Spatial Delivery Option	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
Capstone Valley	--	0	-	--	-	--	++	-	0	-	--	+
Chatham Docks	--	--	-	0	-	0	++	+	0	++	0	+
Cliffe and Cliffe Woods	-	0	--	-	-	--	+	--	0	--	-	+
East of Rainham	-	0	-	--	-	--	+	--	-	-	+	+
Employment	+/-	--	--	-	-	-	0	--	-	--	0	++
Hoo Peninsula	--	0	--	--	--	--	++	--	--	--	-	+
Medway City Estate	-	--	-	0	--	-	+	-	-	0	-	+
Medway Valley	-	-	--	--	--	--	+	--	-	0	--	+
North of Rainham	--	-	-	--	-	--	++	-	-	0	-	+
North of Strood	-	0	-	--	--	--	+	--	-	0	-	+
Suburban	-	0	-	-	-	0	+	0	0	+	+	+
Urban	--	--	-	0	--	0	++	++	--	++	++	+

[38] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 29/04/25]

Selection and rejection of spatial delivery options

5.4.7 A combination of SDOs will be required to form a spatial strategy. The Council has considered different combinations of SDOs which could form spatial growth options (see **section 5.5**).

5.5 Spatial growth options

5.5.1 The spatial strategy will direct future growth in Medway for the Plan period to 2041.

5.5.2 Given Medway's geography and constraints, including environmental constraints on the Hoo Peninsula and transport constraints within the existing urban areas, the Council is limited in the number of different spatial approaches it can take to accommodate growth.

5.5.3 Drawing on information gathered through Call for Sites exercises and the Interim LAA[39] and sites promoted in response to the previous Regulation 18 consultation (2023), three spatial growth options (which constitute reasonable alternative spatial strategies) have been identified by the Council and are summarised in **Table 5.5**. All three options could theoretically meet the identified housing and employment needs for Medway, and are based upon a combination of different spatial delivery options (see **Section 5.4**).

Table 5.5: *Spatial growth options identified by Medway Council*

Option	Characteristics of spatial growth option	Relationship to spatial delivery options
1. Urban Regeneration Focus	The Urban Regeneration Focus spatial growth option is characterised by: • Urban centres catering for everyday needs and acceptable walking distances to public transport nodes. • Maximising development on brownfield sites in urban and waterfront areas by applying an additional 25% (apart from Chatham Docks) to represent densification. • Limited greenfield development adjoining existing larger settlements, including Strood, Rainham, Lordswood and Hoo St Werburgh. • Employment sites are located close to new urban housing, with industry and sui generis uses at Kingsnorth and the Isle of Grain. Based on a maximum yield calculation, plus an additional 25% (apart from Chatham Docks) to represent densification, this option could accommodate up to 23,710 homes.	The Urban Regeneration Focus spatial growth option comprises the following spatial delivery options: • Urban (full) • Chatham Docks (3,000 homes) • Medway City Estate (full) • Capstone Valley (partial) • East of Rainham (full) • Hoo Peninsula (partial) • North of Strood (partial) • Suburban (full)
2. Dispersed Growth	The Dispersed Growth spatial growth option is characterised by: • Extensive release of greenfield and Green Belt land, including Hoo Peninsula, North of Rainham, Medway Valley • Sites such as Darland and Deangate, where there is the potential for environmental impacts. • Limited regeneration where there is not a confirmed or active market interest.	The Dispersed Growth spatial growth option comprises the following spatial delivery options: • Urban (partial, i.e. consented developments only) • Chatham Docks (employment land uses only)

[39] Medway Council (2023) Land Availability Assessment Interim Report, October 2023. Available at: https://www.medway.gov.uk/downloads/file/8413/medway_land_availability_assessment_september_2023 [Date accessed: 29/04/25]

Option	Characteristics of spatial growth option	Relationship to spatial delivery options
	• Large established employment sites, although the more limited town centre regeneration misses opportunities for mixed use developments. Based on a minimum yield calculation, this option could accommodate up to 25,615 homes.	• Capstone Valley (full) • Cliffe and Cliffe Woods (full) • East of Rainham (full) • Hoo Peninsula (full) • Medway Valley (full) • North of Rainham (full) • North of Strood (full) • Suburban (full)
3. Blended Strategy	The Blended Strategy spatial growth option is characterised by: • Urban and new local centres catering for everyday needs and acceptable walking distances to public transport nodes. • Brownfield first with regeneration in town centres and waterfront areas, complemented by suburban and rural areas where development proposals could overcome constraints. • Likelihood of avoiding direct impacts on designations. • Likelihood of providing for the range of housing types for communities. • Density and heights in town centres that are compatible with the Chatham Design Code, other supplementary planning guidance and heritage constraints. • Avoiding coalescence of existing settlement patterns, i.e. maintaining a 'strategic gap'. • Employment sites are located close to new urban housing, with industry and sui generis uses at Kingsnorth and the Isle of Grain. Based on a minimum yield calculation, this option could accommodate up to 23,733 homes.	The Blended Strategy spatial growth option comprises the following spatial delivery options: • Urban (full) • Chatham Docks (3,000 homes) • Medway City Estate (full) • Capstone Valley (partial) • Cliffe and Cliffe Woods (partial) • East of Rainham (full) • Hoo Peninsula (partial) • Medway Valley (partial) • Suburban (full)

5.5.4 **Table 5.6** summarises the SA findings and indicates the best performing option against each SA Objective. The assessments and rankings of the spatial growth options are presented in full within the Regulation 18 SA Interim Report[40].

[40] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 29/04/25]

5.5.5 The urban focus of development through Option 1 will be expected to reduce reliance on private car use and increase sustainable travel. Option 1 was therefore identified as performing well with regard to several SA Objectives including climate change mitigation (SA Objective 1), landscape and townscape (SA Objective 4), natural resources (SA Objective 6) and transport and accessibility (SA Objective 10). Option 2, while not ranking as the best performing option against any SA Objective, offers potential health and wellbeing benefits associated with access to open space due to its dispersed development approach. Furthermore, through a dispersed approach, Option 2 could reduce pressures on existing infrastructure, particularly within urban settlements. Option 3 was identified to provide the most sustainable balance by combining urban regeneration with suburban and rural development, seeking to ensure a diverse range of housing types and tenures can be provided across Medway (SA Objective 7) and economic needs can be met (SA Objective 12) whilst directing the majority of new development to sustainable locations.

Table 5.6: *Impact matrix of spatial growth options (extracted from the Regulation 18 Interim SA Report).*

	1	2	3	4	5	6	7	8	9	10	11	12
Spatial Growth Option	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
1. Urban Regeneration Focus	+	0	-	0	-	+	+	0	0	+	0	+
2. Dispersed Growth	--	-	--	--	--	--	+	0	-	-	-	+
3. Blended Strategy	-	+	0	-	-	-	++	+	0	0	+	++
Best Performing Option?	1	3	3	1	3	1	3	3	3	1	3	3

Selection and rejection of spatial growth options

Comment from Council:
The Regulation 18 (2024) consultation presented three spatial growth options. The third spatial growth option, 'Blended Strategy', was identified as the Council's indicative preferred approach. The Interim SA found that this option is likely to offer the best balance of sustainability considerations to meet Medway's development needs. However, following the Regulation 18 (2024) consultation, the Council's emerging housing trajectory found that the two largest sites could not be expected to be completed by 2041, specifically Mill Fields (LW8) and Chatham Docks (SMI6). A strategic site to the east of Rainham (RSE10) was subsequently rejected following reconsideration the Council's assessment of land availability. No new information about the availability of sites located in town centres was received; there was limited scope to increase densities of sites in these locations. In response to the Regulation 18 (2024) consultation, representations on behalf of the Church Commissioners and Esquire Developments set out compelling cases to allocate more land to the east of Ropers Lane, Hoo St Werburgh (HHH22 & HHH31), and at Lower Rainham (RN9) respectively. Engagement with Gravesham Borough Council led to the reconsideration of three adjoining Green Belt sites to the west of Stood (SNF1, SNF2 and SR5). These sites formed part of the second spatial growth option, 'Dispersed Growth'. Meanwhile, these sites were subsequently deemed suitable, available and achievable, and crucially ensured a housing supply surplus. The final selection of sites still reflects a blended strategy, but it takes account of the outputs of the Council's assessment of land availability.

5.6 Reasonable alternatives: development sites

Evaluation of reasonable alternative sites at Regulation 18 (June 2024)

5.6.1 The Medway Call for Sites request opened in November 2022 and closed at the end of February 2023[41], from which a total of 146 valid submissions were received. Medway Council prepared an Interim LAA in October 2023[42] and a small number of sites were promoted in response to the previous Regulation 18 consultation (2023). The LAA process has considered the following sources of sites in addition to those received through the Call for Sites exercise:

- Unimplemented allocations from the adopted Medway Local Plan (2003);
- Brownfield Land Register;
- Development briefs;
- Land in Medway Council's ownership identified on the Land Registry;
- Emerging neighbourhood plans;
- Planning applications (unimplemented consents, refused, withdrawn and expired as of 31st March 2023);
- Local Development Order for Innovation Park Medway; and
- Vacant and derelict land and buildings.

5.6.2 A total of 447 sites have been identified by the Council through the LAA process and have undergone an initial filtering process. The initial survey screened out sites which would not be capable of delivering five or more homes / 0.25ha of employment floorspace, and sites which could lead to unacceptable impacts on areas where the NPPF provides strong reasons for restricting the overall scale, type or distribution of development[43].

5.6.3 As a result of this filtering process, at the Regulation 18 stage, the Council identified a total of 359 reasonable alternative sites for assessment in the SA process to accommodate new residential and/or employment development.

5.6.4 The Council further categorised the 359 reasonable alternative sites, by identifying strategic sites. Strategic residential-led sites are considered to be those which comprise at least 10ha and could deliver at least 500 new homes (or at least 300 homes for sites in Allhallows, Lower Stoke, Middle Stoke, reflecting the scale of growth in these smaller villages). Strategic employment-led sites are considered to be those which comprise over 75ha. At the Regulation 18 stage, 24 reasonable alternative strategic sites were identified by the Council, of which:

- 19 were residential-led; and
- Five were employment-led).

[41] Opus Consult (2023) Medway Call for sites 2022. Available at: https://medway.oc2.uk/document/5 [Date accessed: 29/04/25]

[42] Medway Council (2023) Land Availability Assessment Interim Report, October 2023. Available at: https://www.medway.gov.uk/downloads/file/8413/medway_land_availability_assessment_september_2023 [Date accessed: 29/04/25]

[43] Footnote 7 of the NPPF (December 2024) states: "*The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change*."

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5.6.5 Additionally, 335 non-strategic reasonable alternative sites were identified by the Council:

- 199 sites identified for residential use;
- 48 sites identified for non-residential use; and
- 88 sites identified for mixed use.

5.6.6 The pre-mitigation assessment of the 24 strategic and 335 non-strategic reasonable alternative sites demonstrated a range of sustainability impacts. The full assessment of the 24 strategic reasonable alternative sites is presented in full within Appendix D, and non-strategic sites within Appendix E, of the Regulation 18 Interim SA Report[44].

Evaluation of reasonable alternative sites at Regulation 19

5.6.7 Following the Regulation 18 consultation in early 2024, Medway Council have produced an updated LAA (2025)[45], and provided updated information for 53 non-strategic reasonable alternative sites, including capacity changes and change of the proposed site use[46]. This now means the 335 reasonable alternative non-strategic sites comprise:

- 200 sites identified for residential use;
- 47 sites identified for non-residential use;
- 87 sites identified for mixed uses; and
- One site identified for either residential or non-residential use.

5.6.8 The Council has also identified two new reasonable alternative strategic sites (Sites SR53 and RN9), and merged two previously assessed strategic sites (Sites HHH2 and HHH31) to be assessed as one site. Furthermore, the Council has provided updated capacity information for six strategic sites (Sites CHR4, HHH12, HH3, LW6, LW8 and SMI6) including capacity changes and change of the proposed site use. This now means the 27 reasonable alternatives strategic sites comprise:

- 22 residential-led strategic sites; and
- Five employment-led strategic sites.

5.6.9 The pre-mitigation assessments of the 27 strategic sites are presented within **Appendix F** and the pre-mitigation assessment of the 335 non-strategic reasonable alternative sites is presented within **Appendix G**, superseding the site assessment information presented within the Regulation 18 Interim SA.

5.6.10 **Figure 5.4** shows how a range of positive and adverse effects were likely to arise from the different reasonable alternative sites , prior to the consideration of the mitigation hierachy.

[44] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 29/04/25]

[45] Medway Council (2025) Medway Local Plan 2041: Land Availability Assessment, June 2025.

[46] NB: Noted change to site capacity includes LW4. At Regulation 18 stage, the capacity of Site LW4 (Sharstead Farm) was 425 homes, i.e. below the 500-homes threshold to be assessed as a strategic site. Following recent engagement between the Council and the site promoter, acting on behalf of the single landowner for the Capstone Valley, the capacity of Sharstead Farm has been revised to 670 homes by 2041. The uplift in density at Sharstead Farm will help to ensure Darland Farm (HW1) is safeguarded as natural and semi-natural green space. The site remains as a non-strategic reasonable alternative site for the purposes of the SA.

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Figure 5.4: *Summary of generalised positive / adverse effects of reasonable alternative sites*

5.6.11 All reasonable alternative sites have been assessed before and after mitigation. The main purpose of this exercise is to avoid any risk of 'green wash': a process whereby immediate application of policy prescription can give the impression that no adverse effects will arise, without knowing the extent of adverse effect that existed in the first place. This process helps achieve transparency in the appraisal process and follows established best practice (RTPI Guidance 2018[47]) of presenting assessment results before and after mitigation has been applied. Evaluating policies in the SA enables scrutiny of how effective the policies are as mitigation tools.

5.6.12 Mitigation, using the emerging MLP policies (see **Appendix H** for the SA evaluation of policies), has been applied to the SA results for each reasonable alternative site and presented in **Appendix I**.

5.6.13 Following the application of policy mitigation, it was identified that many of the pre-mitigation adverse effects will likely be reduced or mitigated, including (but not limited to):

- Provision of employment growth to support identified needs;

[47] RTPI (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: https://www.rtpi.org.uk/practice-rtpi/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/ [Date accessed: 29/04/25]

- Addressing flood risk, promoting sustainable water management and protecting flood defences;
- Protection of nature conservation designations, support for nature recovery and increased GI coverage that will contribute to climate change resilience;
- Improving access via sustainable and active travel modes to services and facilities, including employment opportunities and schools, to address accessibility gaps; and
- Protection of mineral resources, including MSAs.

5.6.14 The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is the Council's role to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the MLP and which to 'reject' from further consideration.

5.6.15 The SA findings relating to reasonable alternative sites were fed back to the Council on an iterative basis to assist in decision-making regarding the selection or rejection of each site within the emerging MLP.

5.6.16 **Appendix J** sets out the sets out the outline reasons for selection and rejection of each reasonable alternative site considered throughout the SA process, provided by Medway Council.

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6 The preferred approach

6.1 MLP policies

6.1.1 The MLP is composed primarily of 88 strategic, thematic and DM policies, which will be anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the MLP are avoided, mitigated or subject to compensatory measures wherever possible. The policies will also provide development proposals with relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision-making processes.

6.1.2 The 88 MLP policies are listed in **Table 6.1** and have been assessed in **Appendix H,** alongside the assessment of the vision and spatial development strategy for the MLP.

6.1.3 The MLP also contains 14 site allocation policies, which are discussed further in **section 6.3** below.

Table 6.1: *Medway Local Plan policies*

Reference	Policy name
Vision	Vision for Medway in 2041
Spatial Development Strategy	Spatial Development Strategy
S1	Planning for climate change
S2	Conservation and enhancement of the natural environment
S3	North Kent Estuary and marshes designated sites
S4	Landscape protection and enhancement
S5	Securing strong green and blue infrastructure
S6	Kent Downs National Landscape
DM1	Flood and water management
DM2	Contaminated land
DM3	Air quality
DM4	Noise and light pollution
S7	Green Belt
T1	Promoting high quality design
DM5	Housing design
DM6	Sustainable design and construction
DM7	Shopfront design and security
DM8	Advertisements
S8	Historic environment
DM9	Heritage assets
S9	Star Hill to Sun Pier
DM10	Conservation areas
DM11	Scheduled monuments and archaeological sites
T2	Housing mix
T3	Affordable housing
T4	Supported housing, nursing homes and older persons accommodation
T5	Student accommodation
T6	Mobile home parks
T7	Houseboats

Reference	Policy name
T8	Houses of multiple occupation
T9	Self-build and custom housebuilding
T10	Gypsy, Travellers and Travelling Showpeople
T11	Small sites and SME housebuilders
S10	Economic strategy
S11	Existing employment provision
S12	New employment sites
T12	Learning and skills development
T13	Tourism, culture and visitor accommodation
S14	Supporting Medway's culture and creative industries
T14	Rural economy
S15	Town Centres Strategy
S16	Hierarchy of centres
T15	Sequential assessment
T16	Ancillary development
T17	Impact assessment
S17	Chatham Town Centre
S18	Rochester District Centre
S19	Gillingham District Centre
S20	Strood District Centre
S21	Rainham District Centre
S22	Hoo Peninsula
S23	Hempstead Valley District Centre
DM12	Local and rural centres
T18	Shopping parades and neighbourhood centres
T19	Meanwhile uses
DM13	Medway Valley Leisure Park
DM14	Dockside
DM15	Monitoring and managing vehicle trip generation
T20	Riverside Path
DM16	Chatham Waters Line
DM17	Grain Branch
T21	Riverside infrastructure
T22	Marinas and moorings
T23	Aviation
T24	Urban logistics
T25	User hierarchy and street design
T26	Accessibility standards
DM18	Transport assessments, transport statements and travel plans
DM19	Vehicle parking
DM20	Cycle parking and storage
T27	Reducing health inequalities and supporting health and wellbeing
T28	Existing open space, outdoor sports and play spaces
DM21	New open space, outdoor sports and play spaces
T29	Community and cultural facilities

Reference	Policy name
S24	Infrastructure delivery
DM22	Digital communications
T30	Safeguarding mineral resources
T31	Safeguarding of existing mineral supply infrastructure
T32	Supply of recycled and secondary aggregates
T33	Extraction of land won minerals
DM23	Waste prevention
T34	Safeguarding of existing waste management facilities
T35	Provision of additional waste management capacity
T36	Location of waste management facilities
T37	Other recovery
T38	Non-inert landfill
T39	Beneficial use of inert waste by permanent deposit
T40	Wastewater treatment
S25	Energy supply
T41	Heat networks

6.1.4 The MLP policies will be expected to ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the MLP are avoided, mitigated or subject to compensatory measures wherever possible. The policies will also provide any potential development proposals with relevant supporting information to ensure that any impacts from development can be appropriately factored into decision-making processes.

6.1.5 For many of the MLP policies, the assessments have resulted in negligible, minor positive or major positive impacts. Negligible impacts were identified where the policy was not anticipated to cause any adverse impact on the SA Objectives, including on any of the receptors set out in the SA Framework (see **Appendix B**), which is the case for many of the more 'thematic' policies.

6.1.6 There has however been a greater range of sustainability effects identified for policies which have the potential to introduce new development in the Plan area, particularly the policies relating to housing and the economy, as well as the Spatial Development Strategy which sets out the direction of growth for Medway. As such, potential minor negative, major negative or uncertain impacts have been identified for some SA Objectives as a result of policies in these sections, owing to the potential for the large amount of proposed development to lead to increases in pollution and waste, or introduction of new development into areas where there may be sensitive receptors.

6.1.7 There is some uncertainty in the evaluation of policies where the location, scale and design of potential new development that might occur is unknown, in relation to housing and employment policies, and policies such as T20 'Riverside Path' and DM16 'Chatham Waters Line'.

6.1.8 The impact matrix for the policy assessments is presented in **Table 6.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix H**.

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Table 6.2: *Summary of policy assessments (extracted from* ***Appendix H****)*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
Vision	++	++	+	+	+	+	++	++	++	++	++	++
SDS	+	+/-	+/-	+	+/-	+	++	+	+/-	+/-	+	++
S1	++	++	+	0	+	+	0	+	0	+	0	+
S2	+	+	+/-	+	+	+	0	0	0	0	0	0
S3	+	+	+/-	+	0	+	-	0	0	0	0	-
S4	+	+	+	++	0	+	0	+	+	0	0	0
S5	+	+	+	+	+	+	0	+	+	+	0	0
S6	+	+	+	++	0	+	0	+	+	0	0	0
DM1	+	++	+	+	+	+	0	+	0	0	0	+
DM2	0	0	+	0	+	+	+	+	0	0	0	0
DM3	0	0	+	0	+	0	0	+	0	0	0	0
DM4	0	0	0	0	+	0	0	+	0	0	0	0
S7	+	+	+	+	0	+	+	+	0	0	0	0
T1	+	+	+	++	0	+	+	+	+	+	+	+
DM5	+	0	+	+	+	0	+	+	0	0	0	0
DM6	+	0	0	+	+	+	+	+	0	+	+	+
DM7	0	0	0	+	0	0	0	0	+	0	0	0
DM8	0	0	0	+	0	0	0	0	0	0	0	0
S8	0	0	0	+	0	0	0	+	++	0	0	0
DM9	0	0	0	+	0	0	0	0	+	0	0	0
S9	+	0	0	+	0	0	0	0	++	+	0	+
DM10	0	0	0	+	0	0	0	0	+	0	0	0
DM11	0	0	0	0	0	0	0	0	+	0	0	0
T2	+	0	0	0	0	0	+	+	0	0	0	+
T3	+	0	0	0	0	0	+	+	0	0	0	0
T4	0	0	0	0	0	0	+	+	0	+	0	0
T5	+	0	0	0	0	0	+	0	0	+	+	0
T6	0	0	0	+	0	0	+	0	0	0	0	0
T7	0	0	+	0	0	0	+	0	0	0	0	0
T8	0	0	0	0	0	0	+	0	0	0	0	0
T9	0	0	0	+	0	0	+	0	0	0	0	0
T10	0	+	+/-	-	+/-	+	+	+	+/-	+	+	0
T11	0	0	0	+	0	0	+	0	0	+	0	+
S10	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++
S11	0	0	0	0	0	0	0	0	0	0	0	+
S12	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++
T12	+	0	0	0	+	0	0	+	0	+	++	+
T13	0	+	+	+	0	0	0	+	+	+/-	0	+
S14	0	0	0	+	0	0	0	+	+	+	0	+
T14	0	0	0	0	0	0	0	0	0	+	0	+
S15	+	+	+	+	+	+	0	+	+/-	+	0	++
S16	+	+	+/-	+	+	+	0	+	+/-	+	0	++
T15	+	+	+/-	+	+	+	0	+	+/-	+	0	+
T16	0	0	0	0	0	0	0	0	0	0	0	+

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T17	+	0	0	0	0	0	0	+	0	+	0	+
S17	+	0	0	0	0	+	+	+	+/-	+	0	++
S18	+	0	0	0	0	0	0	+	0	0	0	+
S19	0	0	0	+	+	0	0	+	0	+	0	+
S20	+	0	0	+	+	+	0	++	+/-	+	0	++
S21	0	0	0	0	+	0	0	+	0	+	0	+
S22	+	0	0	0	+	0	0	+	0	+	0	+
S23	0	0	0	0	0	0	0	0	0	0	0	+
DM12	+	0	0	+	+	0	0	+	0	+	0	+
T18	+	0	0	0	+	0	0	+	0	+	0	+
T19	0	0	0	+	0	0	0	0	0	0	0	+
DM13	+/-	0	0	0	+/-	0	0	+	0	+/-	0	+
DM14	+/-	0	0	+	+/-	+	0	+	+	+	0	+
DM15	+	0	0	0	+	0	0	+	0	+	0	0
T20	+	0	+/-	+	+	0	0	+	+/-	+	0	0
DM16	+	0	+/-	+/-	+	0	0	+	0	+	0	+
DM17	+	0	0	0	+	0	0	0	0	++	0	+
T21	0	0	0	0	0	+	0	0	+/-	+	0	++
T22	0	0	0	0	0	0	0	0	+/-	0	0	+
T23	0	0	0	0	0	0	0	0	0	+	+	+
T24	+/-	0	0	0	+/-	0	0	0	0	+/-	0	+
T25	+	0	0	+	+	0	0	+	0	+	0	0
T26	+	0	0	0	+	0	0	+	0	+	+	0
DM18	+	0	0	0	+	0	0	+	0	++	+	+
DM19	+	0	0	+	0	+	0	0	0	+	0	+
DM20	+	0	0	+/-	+	0	0	+	0	+	+	+
T27	+	0	0	0	0	0	0	++	0	+	0	0
T28	+	+	+	+	0	0	0	++	0	0	0	0
DM21	+	+	+	+	+	0	0	++	0	+	0	0
T29	+	0	0	0	0	0	0	+	+	+	0	0
S24	+	+	0	++	+	0	0	++	0	++	++	+
DM22	+	0	0	0	+	0	0	0	0	+	+	++
T30	0	0	0	0	0	++	+/-	0	0	0	0	+
T31	0	0	0	0	0	+	+/-	0	0	0	0	+
T32	+	0	-	+	+	+	0	-	+/-	+	0	+
T33	+	0	-	-	-	++	0	-	+/-	+	0	+
DM23	+	0	0	0	++	+	0	0	0	0	0	0
T34	0	0	0	0	+	0	0	0	0	0	0	0
T35	+/-	-	-	-	++	-	0	-	-	-	0	0
T36	0	0	0	0	+	+/-	0	0	0	0	0	0
T37	+	+/-	+/-	+/-	+	+/-	0	+/-	+/-	+/-	0	0
T38	+/-	+/-	+/-	0	+	+/-	0	+/-	+/-	+/-	0	0
T39	+/-	0	0	+	+	+	0	0	+	+/-	0	0
T40	0	0	0	0	+	0	0	0	0	0	0	0
S25	++	--	--	-	+/-	-	0	+/-	-	-	+	++

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T41	+	0	0	0	0	0	0	+	0	0	0	0

6.2 Assessment of site allocations

6.2.1 The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is the role of the Council to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the MLP and which to 'reject' from further consideration (see **Appendix J** for more details).

6.2.2 A total of 131 sites have been selected for allocation in the MLP by Medway Council (see **Figures 6.1 – 6.5**). This includes 12 'strategic' sites and 119 'non-strategic' sites.

6.2.3 These sites will collectively result in the delivery of 21,194 homes to meet identified needs (in combination with 1,762 pipeline sites and 1,584 windfall sites) and sufficient land for a portfolio of employment sites that meet the needs of different types of businesses to meet the identified employment land needs (204,000m^2 industrial and 36,500m^2 office space, plus account for lack of building stock identified in the ELNA).

6.2.4 As discussed in **Chapter 5**, all reasonable alternative sites were evaluated in the SA process pre-mitigation (see **Appendix F** for strategic sites and **Appendix G** for non-strategic sites) and post-mitigation (see **Appendix I**). The SA findings were fed back to the Council on an iterative basis to assist in decision-making regarding the selection or rejection of each site within the emerging MLP.

6.2.5 The post-mitigation SA findings for the sites chosen for allocation by the Council are summarised in **Table 6.3**, illustrating a range of identified sustainability effects identified through the assessment process.

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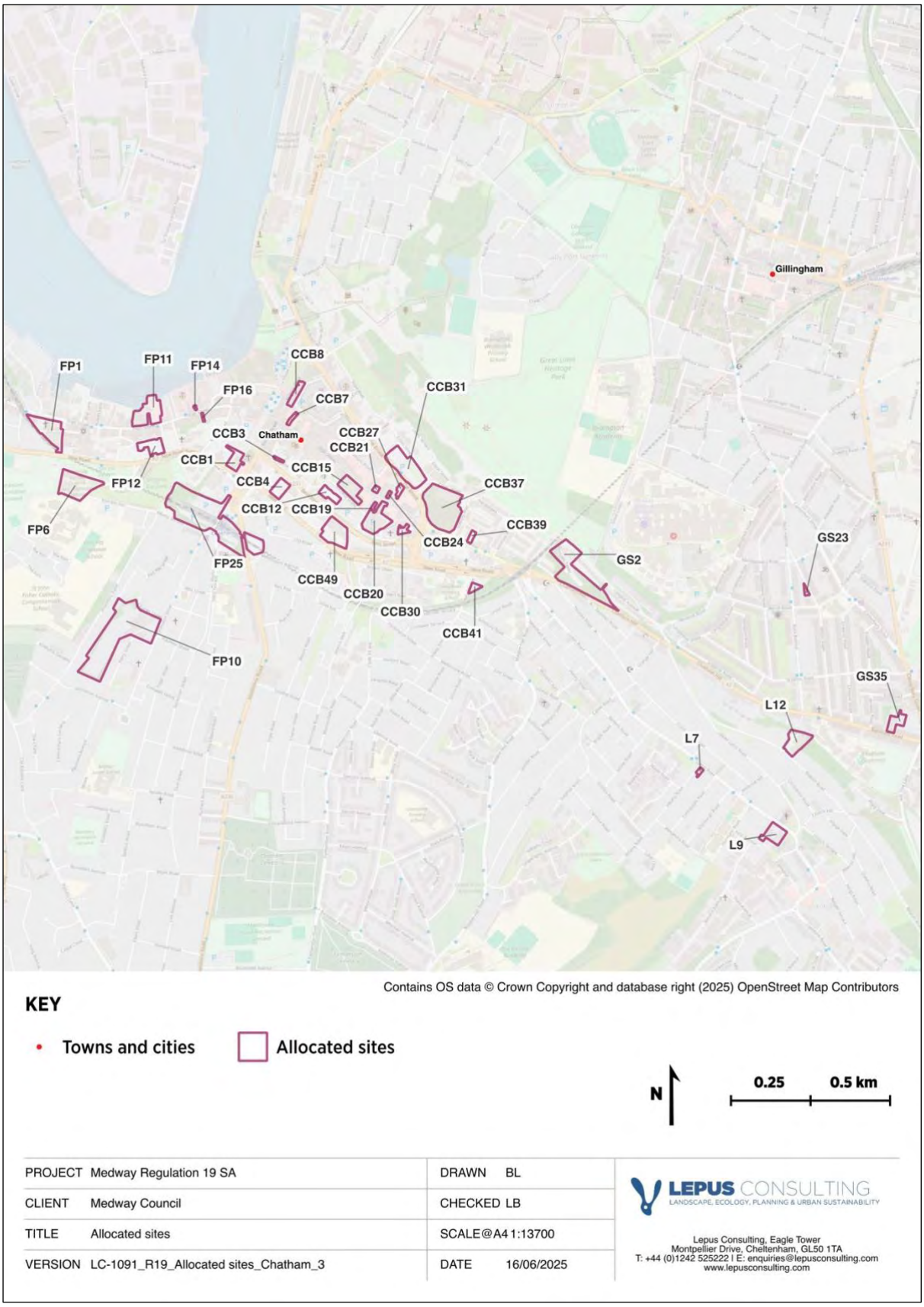

Figure 6.1: *Map showing the location of allocated sites in and around Chatham*

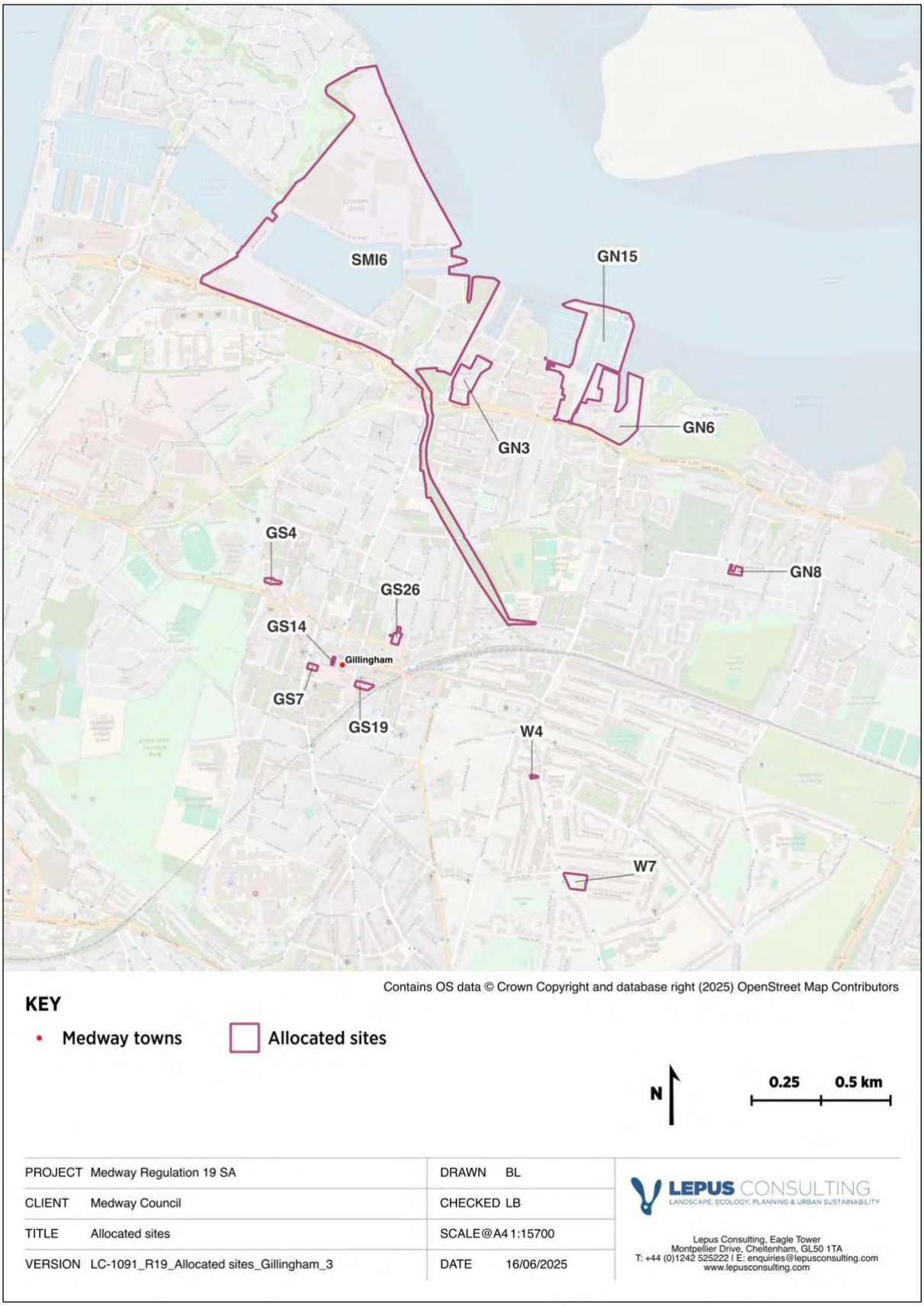

Figure 6.2: *Map showing the location of allocated sites in and around Gillingham*

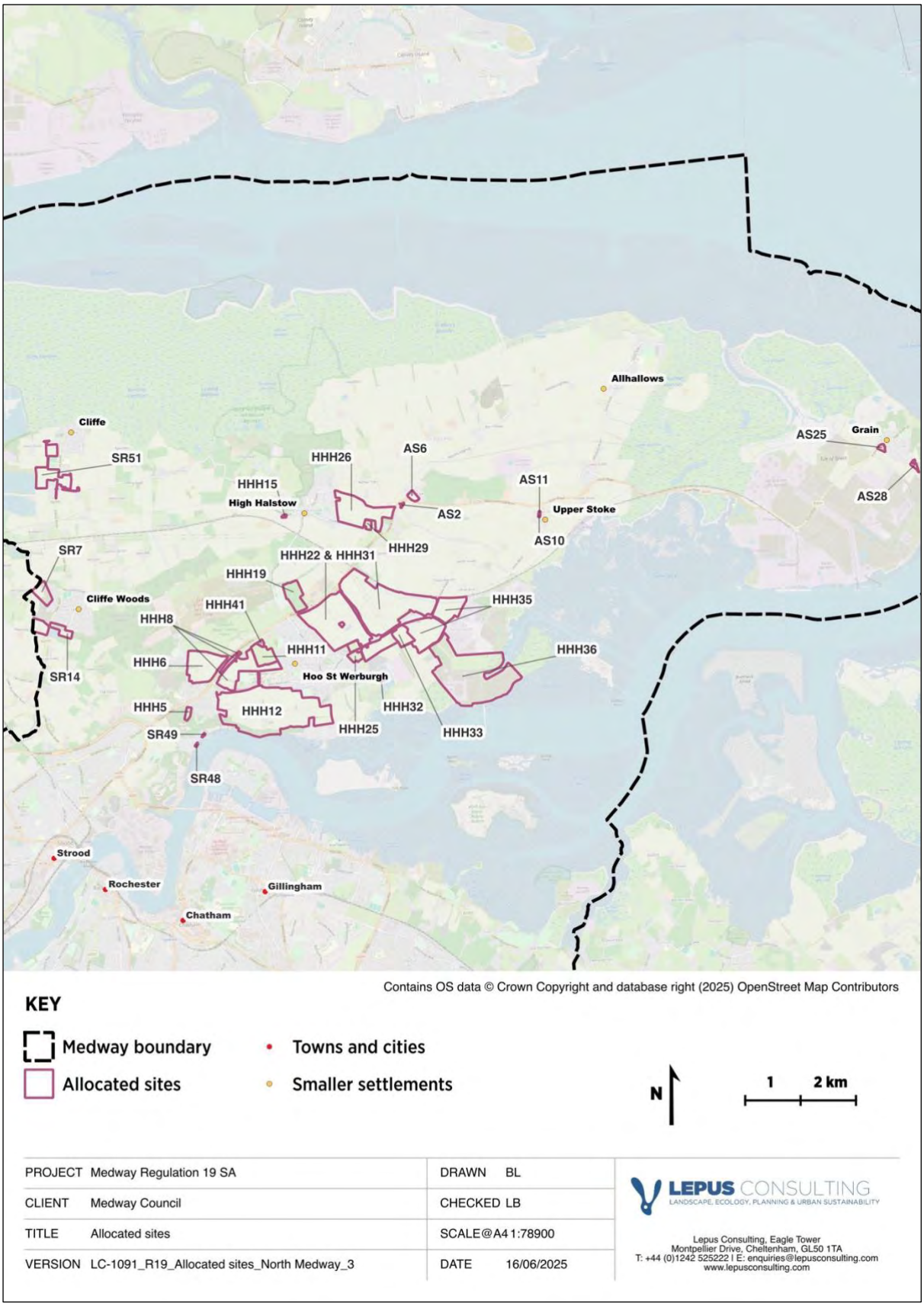

Figure 6.3: *Map showing the location of allocated sites in the north of Medway*

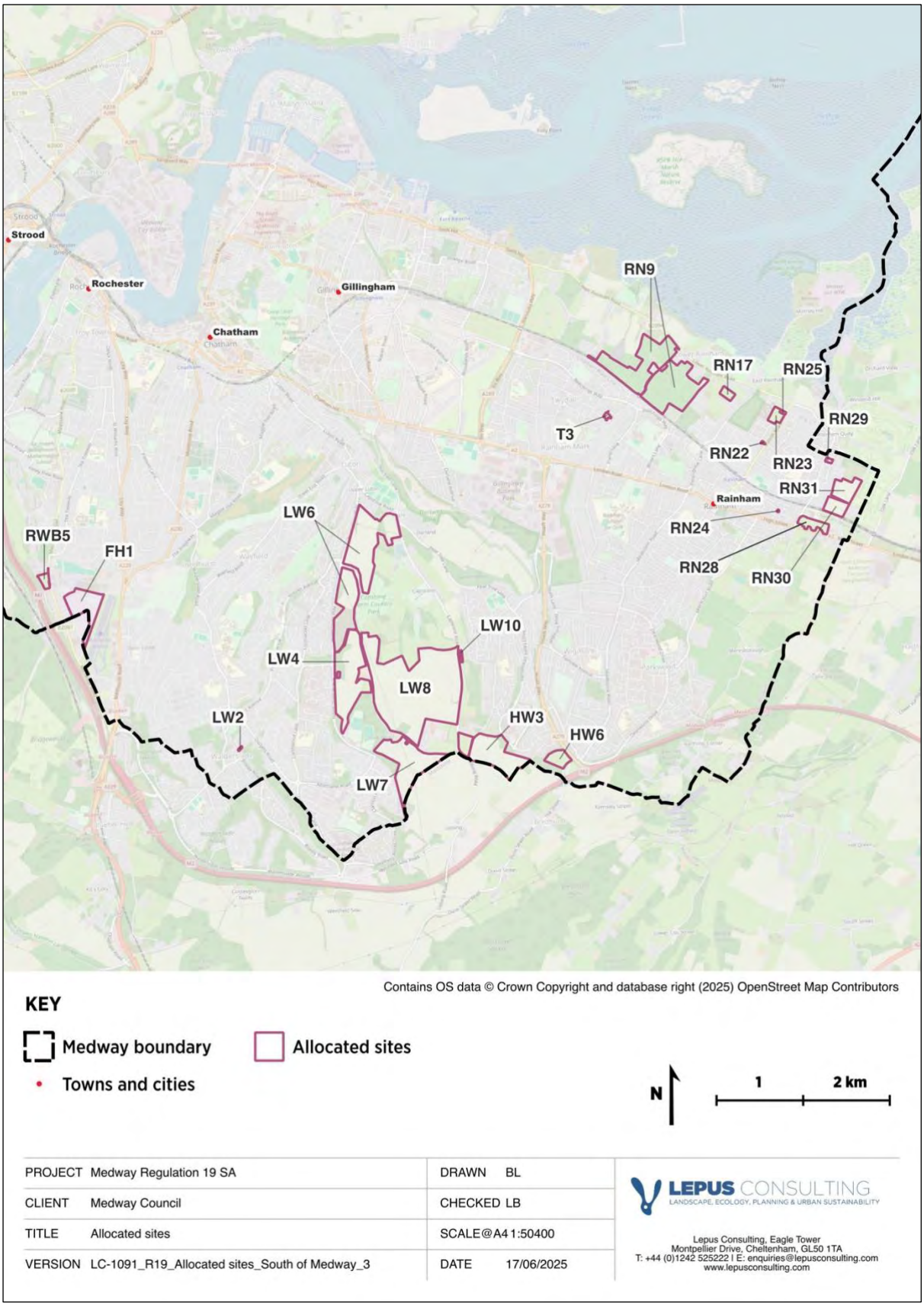

Figure 6.4: *Map showing the location of allocated sites in the south of Medway*

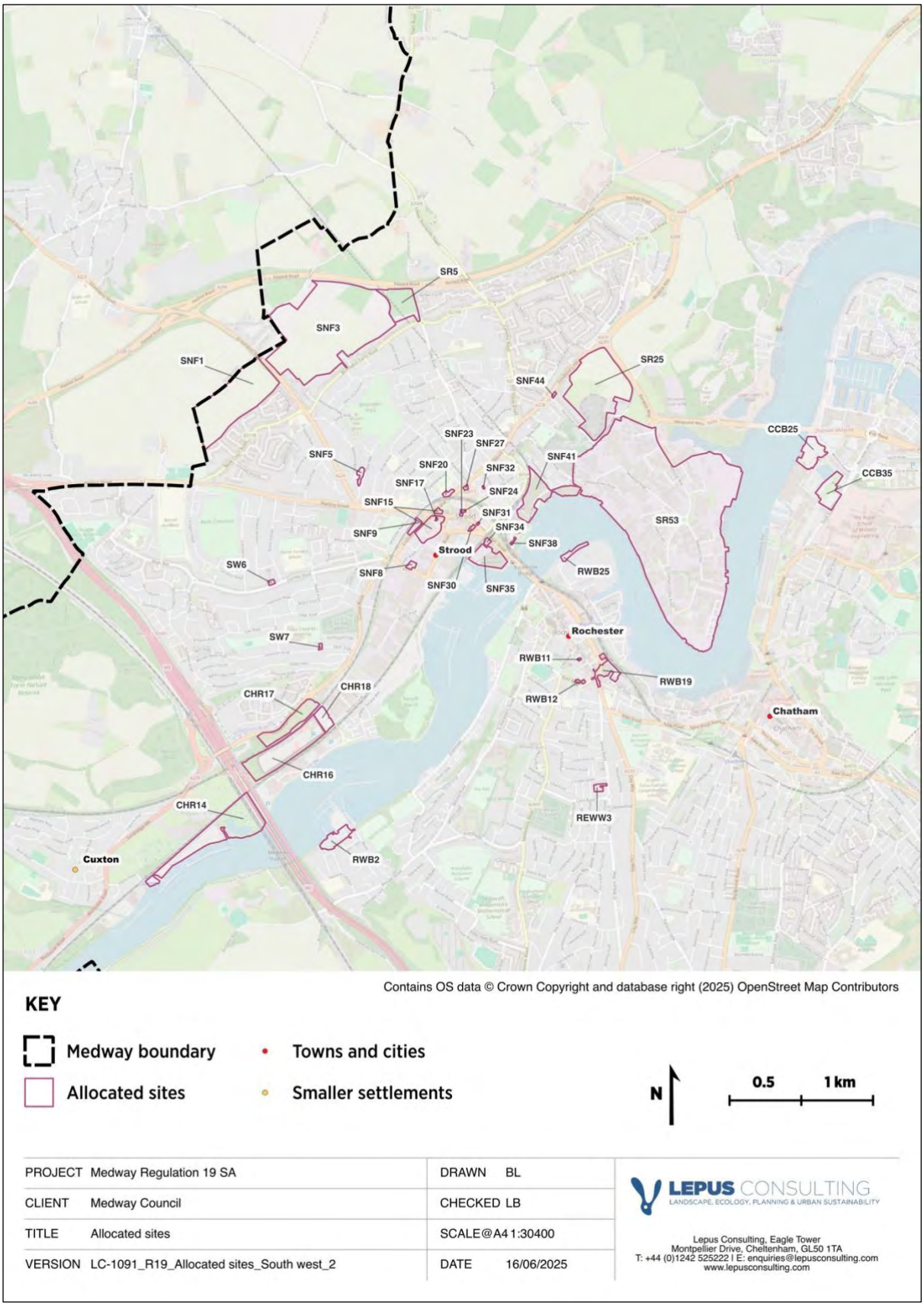

Figure 6.5: *Map showing the location of allocated sites in the south west of Medway*

Table 6.3: *Summary of post-mitigation site assessments for allocated sites (extracted from* ***Appendix I****)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
AS10	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS11	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS2	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS25	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
AS28	Residential led	+/-	-	-	-	-	-	+	-	0	-	+	+
AS6	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	0	+
CCB1	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
CCB12	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
CCB15	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB19	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB20	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB21	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB24	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB25	Residential led	+/-	-	-	-	-	+	++	-	0	++	+	+
CCB27	Residential led (Mixed-use)	+/-	-	+/-	-	-	+	+	+	0	++	+	+
CCB3	Residential led (Mixed-use)	+/-	+	+/-	-	-	+	+	-	0	++	+	+
CCB30	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
CCB31	Residential led	+/-	-	+/-	+/-	-	-	++	+	0	++	+	+
CCB35	Non-residential	+/-	-	+/-	-	-	-	0	+	0	++	0	++
CCB37	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	++	+	0	++	+	+
CCB39	Residential led	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
CCB4	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
CCB41	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
CCB49	Residential led	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
CCB7	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	-	+	+	0	++	+	+
CCB8	Residential led	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
CHR14	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	+	0	+
CHR16	Non-residential	+/-	+	+/-	-	-	-	0	-	0	+	0	0
CHR17	Non-residential	+/-	+	+/-	+/-	-	-	0	-	0	+	0	++
CHR18	Non-residential	+/-	+	+/-	-	-	+	0	-	0	+	0	0
FH1	Non-residential	+/-	+	+/-	-	-	+	0	-	0	-	0	++
FP1	Residential led	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
FP10	Residential led	+/-	+	+/-	-	-	-	++	-	0	++	+	+
FP11	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	++	-	0	++	+	+
FP12	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
FP14	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
FP16	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
FP25	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	-	++	-	0	++	+	+
FP6	Residential led	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
GN15	Residential led (Mixed-use)	+/-	-	-	-	-	+	++	-	0	++	+	+
GN3	Residential led	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
GN6	Residential led (Mixed-use)	+/-	-	-	-	-	-	++	+	0	++	+	+
GN8	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	+	+	+
GS14	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS19	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS2	Residential led	+/-	+	+/-	-	-	-	+	+	0	++	+	+
GS23	Residential led	+/-	+	+/-	+/-	+/-	+	+	+	0	++	+	+
GS26	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS35	Residential led	+/-	+	+/-	-	-	+	+	-	0	++	+	+
GS4	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS7	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
HHH11	Residential led	+/-	+	+/-	-	-	-	++	-	0	-	+	+
HHH15	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
HHH19	Non-residential	+/-	+	+/-	-	-	-	0	-	0	-	0	++
HHH24	Residential led	+/-	+	+/-	-	-	-	++	-	0	-	0	+
HHH25	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HHH29	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HHH32	Residential led	+/-	-	+/-	--	+/-	-	+	-	0	-	0	+
HHH33	Residential led	+/-	+	+/-	-	-	--	++	-	0	-	0	+
HHH41	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
HHH5	Residential led	+/-	+	-	--	-	-	+	-	0	-	+	+
HHH8	Residential led (Mixed-use)	+/-	+	+/-	-	-	--	++	-	0	-	+	+
HW11	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HW3	Residential and secondary school	+/-	+	+/-	-	-	--	++	-	0	-	++	+
HW6	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
L12	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
L7	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
L9	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
LW10	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	-	0	+
LW2	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
LW4	Residential led	+/-	+	+/-	-	-	--	++	-	0	-	0	+
LW7	Residential led	+/-	+	+/-	-	-	--	++	-	0	-	0	+
REWW3	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RN17	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN22	Residential led	+/-	+	+/-	+/-	+/-	-	+	-	0	++	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
RN23	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN24	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RN25	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	+	+	+
RN28	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN29	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	+	+	+
RN30	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN31	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RWB11	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB12	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB19	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
RWB2	Residential led	+/-	-	-	-	-	-	+	-	0	-	+	+
RWB25	Residential led	+/-	-	-	-	-	+	++	-	0	++	+	+
RWB5	Non-residential	+/-	+	+/-	-	-	-	0	-	0	-	0	++
SNF1	Residential led	+/-	+	+/-	-	-	-	++	-	0	-	+	+
SNF15	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
SNF17	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
SNF20	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
SNF23	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF24	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF27	Residential led	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
SNF30	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF31	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF32	Residential led	+/-	-	+/-	+/-	-	-	+	+	0	++	+	+
SNF34	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF35	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	++	-	0	++	+	+
SNF38	Residential led	+/-	-	+/-	-	-	-	+	+	0	++	+	+
SNF41	Residential led (Mixed-use)	+/-	-	-	-	-	+	++	+	0	++	+	+
SNF44	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	+	+	+
SNF5	Residential led	+/-	+	+/-	-	-	-	+	+	0	+	+	+
SNF8	Residential led (Mixed-use)	+/-	+	+/-	-	-	+	+	+	0	++	+	+
SNF9	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	+	0	++	+	+
SR14	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
SR25	Residential led	+/-	+	+/-	--	-	-	++	-	0	+	+	+
SR4	Residential led	+/-	+	+/-	-	-	-	++	-	0	+	0	+
SR48	Residential led	+/-	-	-	-	-	+	+	-	0	-	+	+
SR49	Residential led	+/-	-	-	-	-	-	+	-	0	-	+	+
SR5	Residential led	+/-	+	+/-	-	-	-	++	-	0	+	+	+
SR51	Residential led (Mixed-use)	+/-	+	-	-	-	--	++	-	0	-	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
SR7	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
SW6	Residential led	+/-	+	+/-	+/-	+/-	-	+	+	0	++	+	+
SW7	Residential led	+/-	+	+/-	+/-	+/-	-	+	-	0	++	+	+
T3	Residential led	+/-	+	+/-	-	-	-	+	+	0	++	+	+
W4	Residential led	+/-	+	+/-	+/-	+/-	+	+	+	0	++	+	+
W7	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
HHH12	Strategic Residential led (Mixed-use)	+/-	+	--	--	--	--	++	-	0	-	+	++
HHH22/ HHH31	Strategic Residential led (Mixed-use)	+/-	-	+/-	-	--	--	++	-	0	-	++	++
HHH26	Strategic Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
HHH35	Strategic Non-residential	+/-	-	+/-	-	--	--	0	-	0	+	0	++
HHH36	Strategic Non-residential	+/-	-	--	-	--	-	0	-	0	-	0	0
HHH6	Strategic Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
LW6	Strategic Residential led	+/-	+	+/-	-	--	--	++	-	0	-	+	+
LW8	Strategic Residential led	+/-	+	+/-	-	--	--	++	-	0	-	0	++
RN9	Strategic Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	+	0	++	++	++
SMI6	Strategic Residential led (Mixed-use)	+/-	-	-	-	--	+	++	+	0	++	+	+
SNF3	Strategic Residential led	+/-	+	+/-	-	--	--	++	-	0	+	0	++
SR53	Strategic Residential led (Mixed-use opportunity area)	+/-	+/-	-	+/-	--	+	++	-	0	+	+	+

6.3 Site allocation policies

6.3.1 In addition to the 88 strategic, thematic and DM policies as outlined in **section 6.1**, Medway Council has prepared 14 site allocation policies (listed in **Table 6.4**). Each policy relates to a number of site allocations that have been proposed for inclusion in the MLP, grouped by geographic area.

Table 6.4: *Medway Local Plan site allocation policies*

Reference	Policy name
SA1	Chatham Town Centre and Surrounds
SA2	Heritage-led Sites
SA3	Gillingham District Centre and Surrounds
SA4	River Waterfront

Reference	Policy name
SA5	Strood District Centre and Surrounds
SA6	Land West of Strood
SA7	Capstone Valley
SA8	Hoo St Werburgh and Chattenden
SA9	High Halstow
SA10	Lower Rainham
SA11	Rural Settlements
SA12	Other Sites
SA13	Frindsbury Peninsula Opportunity Area
SA14	Employment Sites

6.3.2 Each site allocation policy has been evaluated in **Appendix K**, drawing on the post-mitigation site assessments as presented in **Appendix I** and outlined in **section 6.2**. The assessment considers the extent to which the provisions of the 14 site allocation policies will further improve sustainability of these sites, compared to the post-mitigation assessment findings.

6.3.3 The assessment findings are summarised in **Table 6.5**. The majority of site policies will ensure sustainable access to schools, healthcare, jobs and local services are improved (SA Objectives 8, 10, 11, 12). The policies will ensure that, particularly in the urban areas, opportunities are sought for heritage-led development and regeneration to conserve and enhance the landscape/townscape and historic environment (SA Objective 4 and 9). The majority of sites lie in Flood Zone 1 where fluvial flood risk is low and climate change adaptation measures can be secured via careful integration of GI (SA Objective 2).

6.3.4 However, potential adverse impacts have been indentified in relation to the loss of high-quality agricultural land (SA Objective 6), alteration of rural landscape character (SA Objective 4), and the generation of pollution associated with new development (SA Objective 5). For more rurally located sites, minor negative effects have been identified in relation to transport and access to healthcare (SA Objectives 8 and 10). Some allocations lie within Flood Zones 2 and/or 3, where site-specific flood risk assessments will be required to confirm the potential for mitigation (SA Objective 2).

6.3.5 Uncertainty remains in the assessment against climate change mitigation (SA Objective 1) where there is potential for both positive and adverse effects on GHG emissions associated with the scale of development proposed alongside encouragement for minimising embodied emissions and supporting sustainable energy infrastructure. Additionally, the impacts of all allocations on biodiversity are uncertain at the time of writing, in absence of the HRA conclusions (SA Objective 3) (see **Chapter 8** for further details). For all policies, the potential impacts on Medway's constrained transport network will need to be carefully considered in light of the findings of the emerging Strategic Transport Assessment.

Table 6.5: *Summary of site policy assessments (extracted from* ***Appendix K****)*

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	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA1	+/-	0	+/-	0	-	0	++	+	0	++	+	+
SA2	+/-	-	-	+	-	0	++	+	+	++	+	+
SA3	+/-	+	+/-	0	-	+	++	+	0	++	+	+
SA4	+/-	-	+/-	+	-	0	++	+	+	++	+	+
SA5	+/-	-	+/-	-	-	-	++	+	0	++	+	+
SA6	+/-	+	+/-	0	-	--	++	0	0	+	++	+
SA7	+/-	+	+/-	-	-	--	++	0	0	+	++	+
SA8	+/-	+	+/-	-	-	--	++	-	0	+	++	++
SA9	+/-	+	+/-	-	-	--	++	-	0	+	+	+
SA10	+/-	+	+/-	-	-	--	++	0	0	+/-	++	+
SA11	+/-	-	+/-	-	-	--	++	-	0	-	0	+
SA12	+/-	-	+/-	-	-	-	++	-	0	-	+	+
SA13	+/-	+/-	-	+/-	--	-	++	-	0	+	+	+
SA14	+/-	-	+/-	-	--	--	0	-	0	-	0	++

6.4 Whole plan appraisal

6.4.1 The following chapters present an assessment of the likely significant effects associated with the MLP in relation to the following topics:

- Air (**Chapter 7**);
- Biodiversity, flora and fauna (**Chapter 8**);
- Climatic factors (**Chapter 9**);
- Cultural heritage (**Chapter 10**);
- Human health (**Chapter 11**);
- Landscape (**Chapter 12**);
- Population and material assets (**Chapter 13**);
- Soil (**Chapter 14**); and
- Water (**Chapter 15**).

6.4.2 Each of the topic sections are presented in terms of baseline, impacts, mitigation and residual effects, where appropriate. The topics have been appraised in terms of plan-wide impacts and draw on all aspects of the SA process, including the findings presented for the assessment of policies and site allocations (see **Volume 3: Appendices** for the full assessments). The assessments include consideration of the impacts arising as a consequence of the inter-relationship between the different topics and identify secondary, cumulative and synergistic effects where they arise. Cumulative effects are discussed throughout where relevant, and summarised in **Chapter 16**.

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7 Air

7.1 Baseline

7.1.1 Poor air quality is among the largest environmental risks to public health in the UK. Several objectives have been established in relation to air quality at the European, UK and regional levels seeking to reduce emissions of specific pollutants to minimise adverse effects on health and the environment. Key legislation / PPPs include the Environment Act (2021)[48] which sets out air quality as a priority area, the Air Quality Plan for NO_2[49] and the Clean Air Strategy[50].

7.1.2 Poor air quality is directly linked to mortality, such as through heart disease, lung disease and various cancers. Particulate matter is predominantly associated with vehicular emissions, although agriculture, combustion from domestic heating and the construction industry are also significant sources. The fraction of mortality attributable to particulate air pollution in Medway is 6.4%, which is higher than the regional and national average (see **Table 7.1**).

***Table 7.1**: Fraction of mortality attributable to particulate air pollution (2022)*[51]

Region	Fraction of mortality attributable to particulate air pollution
Medway	6.4%
South East	5.7%
England	5.8%

7.1.3 Poor air quality, and in particular excess atmospheric nitrogen deposition, can also have a variety of impacts on the natural environment which often result in losses in biodiversity, resulting from eutrophication, acidification and toxicity[52][53].

7.1.4 There are currently four AQMAs within Medway which are above the annual objective (an average of 40ug/m^3) for NO_2: Central Medway, Rainham, Gillingham, and Four Elms Hill. Gravesham A2 AQMA which lies in the adjoining Gravesham Borough Council, also borders Medway LPA in the west.

[48] Environment Act 2021. Available at: www.legislation.gov.uk/ukpga/2021/30/contents/enacted [Date accessed: 07/01/25]

[49] DEFRA and DfT (2018) Air quality plan for nitrogen dioxide (NO_2) in UK. Available at: www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017 [Date accessed: 07/01/25]

[50] DEFRA (2019) Clean Air Strategy. Available at: www.gov.uk/government/publications/clean-air-strategy-2019/clean-air-strategy-2019-executive-summary [Date accessed: 07/01/25]

[51] Office for Health Improvement and Disparities (2023) Public Health Profiles: Fraction of mortality attributable to particulate air pollution (new method). Available at: https://fingertips.phe.org.uk/search/air%20pollution#page/4/gid/1/pat/15/ati/401/are/E06000035/iid/93861/age/230/sex/4/cat/-1/ctp/-1/yrr/1/cid/4/tbm/1 [Date accessed: 06/01/25]

[52] Sala, O. E. *et al*. (2000) Global biodiversity scenarios for the year 2100. Science. 287:1770-1774

[53] Air Pollution Information System (2016) Nitrogen Oxides (NOx). Available at: www.apis.ac.uk/overview/pollutants/overview_NOx.htm [Date accessed: 07/01/25]

7.1.5 The Medway Air Quality Action Plan (2024)[54] replaces the previous action plan which ran from 2015-2020, and outlines the context and importance of air quality in Medway including six priorities to achieve compliance with national air quality objectives.

7.1.6 It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) in their Transport Analysis Guidance consider that, *"beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant"*[55]. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers[56] [57]. Exposure to road transport associated emissions may have long term health impacts.

7.1.7 The issue of air quality has been considered under SA Objective 7 'Pollution', which seeks to minimise the extent and impacts of water, air and noise pollution. Indicators for this objective include the number of residents in areas of poor air quality, proximity to pollutants (e.g. main roads), local increases in traffic or congestion and proximity to AQMAs.

Box 7.1: *Summary of key issues for air quality in Medway*

Key issues for air quality include:

⇒ The principal pollutant affecting air quality in Medway is nitrogen dioxide (NO_2), mostly originating from road traffic - reduction in NO_2 emissions is required.

⇒ There are areas of poor air quality within Medway including the strategic road network and AQMAs, and proximity of residential development to pollutants.

⇒ The rate of mortality attributable to particulate matter air pollution in Medway is higher than England's average.

7.2 Evaluating the effect of the MLP on air

7.2.1 **Table 7.2** presents a plan-wide summary of the identified effects of the MLP on air that have been identified through the SA process, considers how the MLP policies will help to reduce or mitigate these effects, and explores the nature of residual effects.

[54] Medway Council (2024) Medway Air Quality Action Plan 2024 (draft). Available at: www.medway.gov.uk/downloads/file/7339/medway_air_quality_action_plan_2024_draft [Date accessed: 06/01/25]

[55] Department for Transport (2019) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 07/01/25]

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

[57] Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

Table 7.2: *Summary of identified effects of the MLP on air*

Identified effects on air	Mitigating MLP policies	Summary of residual effect
Increased generation of, and exposure to, air pollution The construction and occupation of 21,194 new homes and new employment floorspace proposed in the MLP, and associated traffic generated, is likely to increase emissions of pollutants including NO_2 and particulate matter, resulting in a worsening of local air quality. An increase in air pollution could potentially have adverse impacts on ecological networks in Medway which are vulnerable to eutrophication, acidification and increased toxicity. Exposure to sources of air pollution can lead to adverse effects on the health of residents, with children and the elderly being particularly vulnerable. Some 58 allocated sites are located within 200m of an AQMA, and 84 sites within 200m of main road, where there is higher potential for adverse effects associated with exposure to air pollutants.	• Policy **DM3 (Air quality)** promotes appropriate design to improve emissions, such as through the installation of electric charging points and introducing low NO_2 boilers. Development which is expected to negatively impact air quality will provide an air pollution impact assessment with mitigation measures, including development located in proximity to an AQMA or a biodiversity designation. • The **Spatial Development Strategy**, Policy **T26 (Accessibility standards)** and Policy **DM20 (Cycle parking and storage)** aim to reduce reliance on cars and the need to travel through facilitating sustainable and active modes of transport. • Policy **S5 (Securing strong green and blue infrastructure),** Policy **T27 (Reducing health inequalities and promoting health and wellbeing),** and Policy **DM6 (Sustainable design and construction)** all support provision of infrastructure that reduces air pollution levels. • Site Policy **SA1 (Chatham Town Centre and Surrounds)** will ensure air quality in Central Medway AQMA is addressed through the proposal design.	Despite technological and infrastructure advancements, the proposed development of new homes and employment sites within the Plan area will be expected to cumulatively increase the volume of traffic and a result in a greater demand for energy. As such, increased pollutant emissions, particularly NO_2 and PM_{10}, will be likely that cannot be fully mitigated by MLP policies alone. The continued transition to clean technologies will take place over the coming years. **The long-term effect on emissions and air quality is likely to be positive, but short-term negative effects are expected.**

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8 Biodiversity, flora and fauna

8.1 Baseline

8.1.1 The conservation of biological and geological diversity and the protection and monitoring of endangered and vulnerable species and habitats is of great importance. National and European policies identify a hierarchy of designations which aim to promote the protection and enhancement of the natural environment. Key PPPs include the 25 Year Environment Plan[58] and the Biodiversity Strategy for England[59] which seek to halt biodiversity loss, promote nature recovery, and expand multi-functional green infrastructure (GI) networks.

European sites

8.1.2 European sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within Europe. These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive[60] and Special Protection Areas (SPAs) classified under the Birds Directive[61]. Additionally, the NPPF requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated European sites.

8.1.3 These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU, have become part of the National Site Network.

8.1.4 European sites, and associated functionally linked habitat, located within and in proximity to the local plan area, include the Thames Estuary and Marshes Ramsar/SPA in the north and the east and the North Downs Woodland SAC in the Medway Valley to the south (see **Figure 8.1**). The North Downs Woodland SAC is protected for its mature Beech forests and Yew woods within a mosaic of scrub and areas of unimproved chalk grassland[62].

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[58] HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 07/01/25]

[59] DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services. Available at: www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services [Date accessed: 07/01/25]

[60] European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. Available at: http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN [Date accessed: 07/01/25]

[61] European Directive 2009/147/EC on the conservation of wild birds. Available at: http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0147&from=EN [Date accessed: 07/01/25]

[62] JNCC. North Downs Woodlands SAC. Available at: https://sac.jncc.gov.uk/site/UK0030225 [Date accessed: 07/01/25]

8.1.5 A common approach taken across the UK to address recreational impacts at European sites is to establish a Zone of Influence (ZOI) based on detailed visitor survey data. The ZOI is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance at which 75% of interviewees surveyed have travelled to reach a particular site (based on a review of visitor survey data). Recreational ZOIs have been undertaken for the North Downs Woodlands SAC and at the Thames Estuary and Marshes Ramsar/SPA. A 7km buffer has been applied to the North Downs Woodland SAC on the basis of visitor survey work[63]. A 6km buffer has been applied to the Medway and Thames Estuary and Marshes SPA and Ramsar on the basis of the Strategic Access Management and Monitoring (SAMMs) work[64].

8.1.6 A Habitats Regulations Assessment (HRA) has been prepared alongside the development of the MLP which provides an in-depth assessment of the potential threats and pressures to European sites and analysis of potential impact pathways. The evolving outputs of this process have informed the SA.

8.1.7 The Regulation 19 Interim HRA[65] identified likely significant effects (LSEs) at the following European sites as a result of the development proposed from the MLP during the Screening exercise:

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

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[63] Footprint Ecology (2014). Thames, Medway & Swale Estuaries Strategic Access Management and Monitoring Strategy. Available at: https://www.medway.gov.uk/info/200149/planning_policy/146/current_planning_policies/5 [Date accessed: 21/01/25]

[64] Maidstone Borough Council (2012) Boxley Warren Local Nature Reserve Visitor Surveys. Main Results Tabulations by Location of Interview.

[65] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan: Regulation 19 consultation – Interim HRA Report. June 2025.

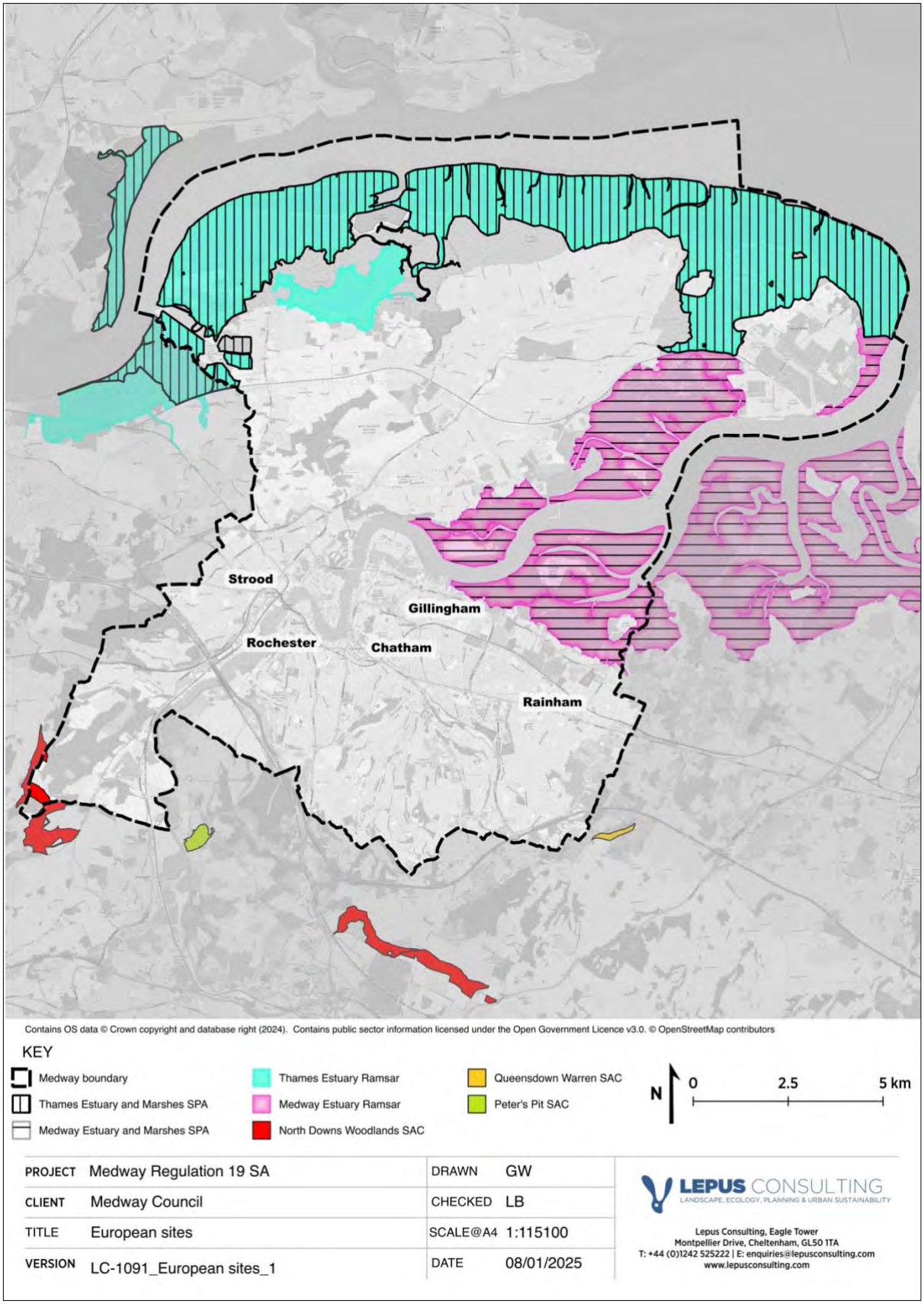

Figure 8.1: *European sites within Medway*

National and local designations

8.1.8 There are eight SSSIs (Sites of Special Scientific Interest) within Medway (see **Figure 8.2**), covering approximately 7,840.54ha: South Thames Estuary and Marshes; Medway Estuary and Marshes; Cobham Woods; Northward Hill; Dalham Farm; Chattenden Woods and Lodge Hill; Tower Hill to Cockham Wood, and Halling to Trottiscliffe Escarpment. All eight SSSIs protect valuable habitats, species, and natural features including the Chattenden Woods and Lodge Hill SSSI which supports one of the largest populations of nightingales (*Luscinia megarhynchos*) in the UK[66]. Two NNRs lie within Medway: High Halstow NNR in the north of the Plan area on the Hoo Peninsula; and the newly designated North Kent Woods and Downs NNR in the south west of the Plan area near Cuxton.

8.1.9 Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to SSSIs. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts[67]. Where a development proposal falls within more than one SSSI IRZ, the worst-case risk zone is reported upon in the assessment.

8.1.10 Marine Conservation Zones (MCZ) are areas that protect a range of nationally important, rare or threatened habitats and species. The Medway Estuary is designated as an MCZ, comprising a complex and dynamic ecosystem of fresh and sea waters, with tidal and intertidal areas, supporting a range of relatively rare species in the South East including the tentacled lagoon-worm (*Alkmaria romijni*)[68].

8.1.11 The MLP area contains an important network of local designations running through the urban area, including eight LNRs covering approximately 454.18ha: Rede Common; Baty's Marsh; Darland Banks; Ambley Wood; South Wood; Levan Strice; Foxburrow Wood, and Berengrave Chalk Pit. These also form important wildlife corridors, allowing species to move between habitats.

8.1.12 Sites of Nature Conservation Importance (SNCIs) form important areas of biodiversity that contribute, in particular, to the ecological network within Medway's urban area. Although these sites do not have statutory protection, they provide necessary geographic integrity that is necessary to reduce habitat fragmentation and isolation of species' populations.

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[66] Kent Wildlife Trust (2025). Lodge Hill. Available at: www.kentwildlifetrust.org.uk/our-work/campaigns/lodge-hill [Date accessed: 13/01/25]

[67] Natural England (2024) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 2 December 2024. Available at: https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones [Date accessed: 07/01/25]

[68] Natural England (no date) Medway Estuary MCZ. Available at: https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UKMCZ0011 [Date accessed: 28/01/25]

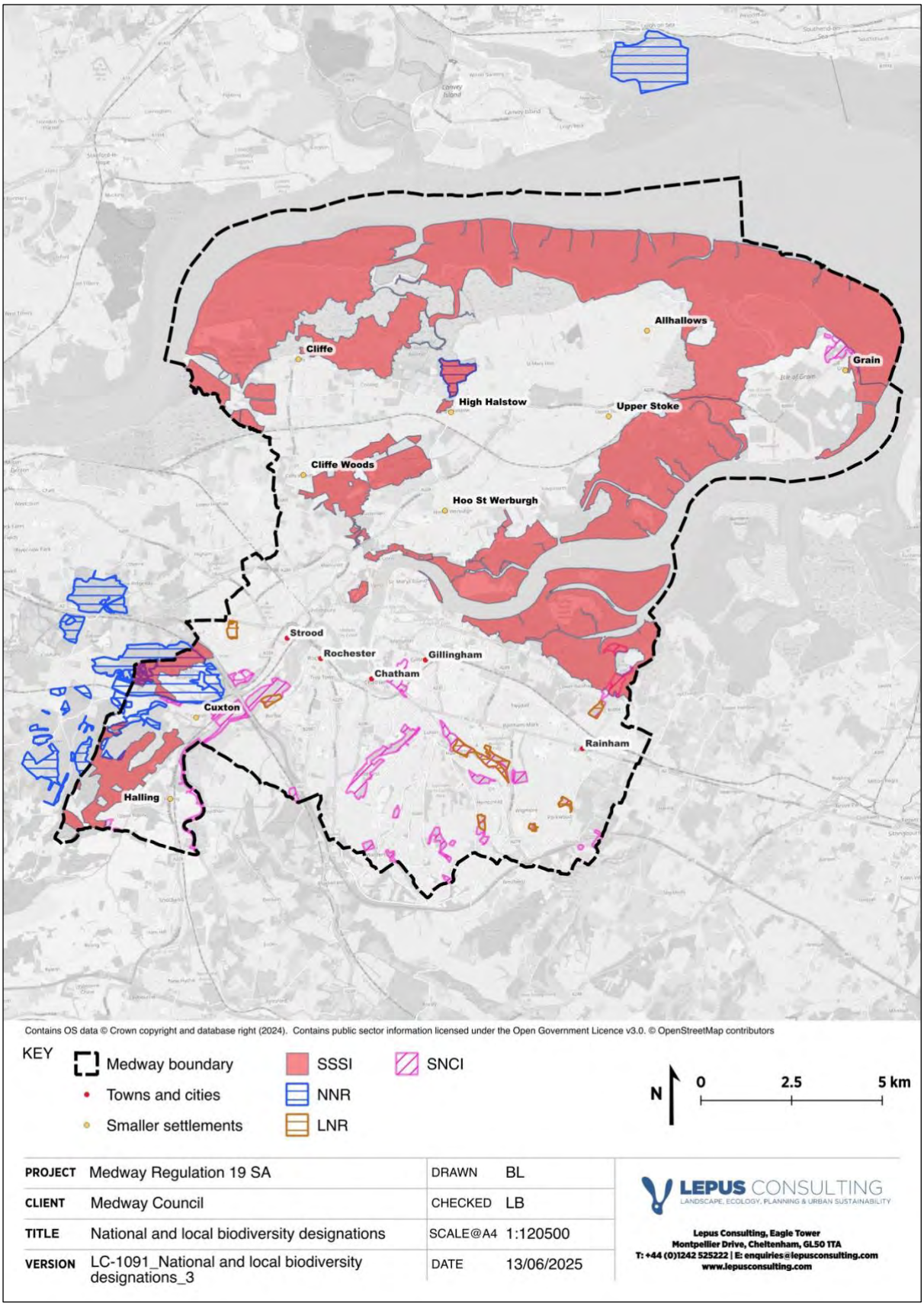

Figure 8.2: *National and local biodiversity assets*

Ancient woodland

8.1.13 The NPPF defines ancient woodland as having been wooded continuously since at least 1600AD. They have a rich cultural history, shaped by centuries of human interaction and management. Ancient woodland is usually a biodiverse habitat that cannot be easily recreated. The NPPF also recognises and advocates the protection of 'plantations on ancient woodland sites'. The Medway administrative area contains 693.10 hectares of ancient woodland, accounting for 2.58% of Medway's total area[69].

Geodiversity

8.1.14 Geodiversity is the collective term describing the geological variety of the Earth's rocks, fossils, minerals, soils and landscapes together with the natural process that form and shape them. Geodiversity underpins biodiversity by providing diversity of habitats and the ecosystem, with the soil being the link between them. There are four Regionally Important Geological Sites (RIGS) within Medway:

- Halling Chalk Pit
- Bores Hole
- Fort Amherst
- Francis Chalk Quarry

Green infrastructure

8.1.15 Well planned and managed GI can enhance ecosystem health and resilience, contributing to biodiversity conservation and human wellbeing[70].

8.1.16 Medway is home to numerous natural / semi-natural open spaces, such as Ranscombe Farm and Cliffe Pools, alongside country parks and a number of smaller parks, greens and amenity spaces within the town and villages that are home to playgrounds and sports facilities. Such GI provides the plan area with ecosystem services including storage and filtration of water, provision of natural flood protection, as well as increased availability of habitats and connectivity within the green network enabling movement of species.

Priority habitats

8.1.17 The NPPF paragraph 192 requires Local Plans to *"…promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity".*

8.1.18 Medway supports several priority habitats protected under the NERC Act, including:

- Good quality semi-improved grassland
- Coastal and floodplain grazing marsh
- Coastal saltmarsh
- Mudflats
- Deciduous woodland

[69] Kent County Council (2020) Kent Environment Strategy. Canopy Cover Assessment. Available at: www.kent.gov.uk/__data/assets/pdf_file/0012/111360/Canopy-cover-report.pdf [Date accessed: 29/04/25]

[70] Natural England (2025) What is Green Infrastructure? Available at: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/WhatIsGreenInfrastructure.aspx [Date accessed: 29/04/25]

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- Saline Lagoon
- Traditional orchard.

8.1.19 Biodiversity, flora and fauna have been predominantly considered under SA Objective 3 'Biodiversity, Flora, Fauna and Geodiversity' which aims to help protect, enhance and manage biological and geological assets within Medway.

Box 8.1: *Summary of key issues for biodiversity, flora and fauna in Medway*

Key issues for biodiversity, flora and fauna include:

⇒ Medway has a rich natural environment including expansive areas of nature conservation habitats which support rare and important species.

⇒ Medway's environmental designations and countryside (including agricultural land) is at threat of being compromised to meet housing demand.

⇒ It is essential that the green infrastructure provision and its accessibility is improved, conserved and enhanced to support the envisaged increase in population and accompanying housing provision

Key issues relating to areas designated pursuant to the Birds and Habitats Directives

⇒ The following LSEs have been identified in the HRA screening process for the MLP:

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

8.2 Evaluating the effect of the MLP on biodiversity, flora and fauna

8.2.1 **Table 8.1** presents a plan-wide summary of the identified effects of the MLP on biodiversity, flora and fauna that have been identified through the SA process, considers how the MLP policies will help to reduce or mitigate these effects, and explores the nature of residual effects.

Table 8.1: *Summary of identified effects of the MLP on biodiversity, flora and fauna*

Identified effects on biodiversity, flora and fauna	Mitigating MLP policies	Summary of residual effect
Threats or pressures to European sites (SAC, SPA and Ramsar) LSEs have been identified in the HRA screening process as described within **section 8.1**, across a number of impact pathways including air quality, water quality/quantity and recreational pressures. A small proportion of the allocated site, based on the land ownership boundary provided (Site HHH36), coincides with the Medway Estuary and Marshes SPA and Ramsar, and a further eight allocated sites are located within 400m of these designations (HHH12, RN9, AS28, GN15, GN6, HHH32, RN23 and RN2). Development at these nine sites could give rise to direct impacts on the qualifying features of these European sites. A 6km recreational ZOI has been identified around the Medway and Thames Estuary and Marshes SPA and Ramsar sites, and a 7km ZOI around the North Downs Woodland SAC. Some 122 allocated sites are located within one or more of these ZOIs and could impact the integrity of European sites without mitigation. Further LSEs regarding air quality, hyrdrology and urbanisation are identified in the HRA.	• Policy **S2 (Conservation and enhancement of the natural environment)** requires development proposals to strengthen biodiversity networks and ensure an effective mitigation approach in particularly sensitive locations, including European sites. • Policy **S3 (North Kent Estuary and Marshes designated sites)** requires residential development within the 6km ZOI to contribute to the North Kent SAMMS, and highlights that larger sites beyond the ZOI may need to secure appropriate mitigation to offset adverse effects associated with recreation. • Policy **S5 (Securing strong green and blue infrastructure)** encourages the use of GI to provide the highest level of protection for European sites. • Site Policy **SA8 (Hoo St Werburgh and Chattenden)** will ensure compliance with the emerging Strategic Environmental Management Plan, to include delivery of new community parkland and wetland habitats to mitigate potential effects on the European designations. • Accompanying masterplan information for Site HHH36 indicates that the site will include green buffers and ecological enhancement corridors, ensuring built development excludes the European site (see **Appendix F**).	The Regulation 19 Interim HRA Appropriate Assessment (AA)[71] has concluded no adverse impacts on the site integrity of any European site due to a change in water quality or water quantity, or urbanisation effects as a result of the MLP either alone or in-combination. The Interim HRA has however not been able to reach a conclusion regarding adverse air quality and recreational impacts upon the site integrity of the North Kent Marshes European sites (Medway Estuary and Marshes SPA/Ramsar, Thames Estuary and Marshes SPA/Ramsar and Swale SPA/Ramsar) and the North Down Woodlands SAC. Further air quality modelling work and a final Hoo Peninsula Strategic Environmental Programme will be evaluated to inform a full AA of air quality and recreational impacts. **Therefore, at the time of writing, the effect of the MLP on European sites is uncertain.**
Threats or pressures to nationally designated biodiversity sites (SSSI, NNR, MCZ) Two allocated sites partially coincide with SSSIs: Sites HHH12 and HHH36 with the Medway Estuary and Marshes SSSI. Additionally, five allocated sites (SMI6, AS28, GN15, GN6 and SR51) are located adjacent to SSSIs. Development at these seven sites could give rise to direct	• Policy **S2** promotes the conservation, restoration and enhancement of MCZs, NNRs, and SSSIs, ensuring it can be demonstrated that significant harm to biodiversity would be avoided. It also sets out the emerging Hoo Peninsula Strategic Environmental Programme which will provide a strategic approach to protecting designated sites including	Policy S2 will help to mitigate adverse impacts on nationally designated biodiversity sites arising from the majority of development proposed in the MLP. However, the policies are not anticipated to fully mitigate adverse effects on SSSIs where proposed sites coincide with, or are located directly adjacent to, SSSIs.

[71] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

Identified effects on biodiversity, flora and fauna	Mitigating MLP policies	Summary of residual effect
impacts on special features of the SSSIs. Sites HHH5 and SR14 are located within 400m of Chattenden Woods and Lodge Hill SSSI, an area particularly sensitive to disturbance to the population of ground nesting birds. A further 120 allocated sites are located within SSSI IRZs which require consultation with Natural England to ensure any potential adverse effects on nearby SSSIs are identified and addressed. Seven allocated sites are located in close proximity to a the High Halstow NNR, and three in proximity to North Kent Woods and Downs NNR, and could result in increased recreational pressures. Some 12 allocated sites are located adjacent to the Medway Estuary MCZ and could result in adverse effects on the marine habitats.	Chattenden Woods and Lodge Hill SSSI, and the Medway Estuary and Marshes SPA/Ramsar/SSSI. • Policy **S5** encourages the use of GI to provide a high level of protection for nationally designated sites. • Other policies, including Policy **T10 (Gypsy, Travellers and Travelling Showpeople)** and **Policy T22 (Marinas and moorings)** require development proposals to be located away, or have consideration for nationally designated sites. • Accompanying masterplan information for several allocated strategic sites located within SSSI IRZs indicates that the proposed development will include GI and ecological enhancements such as green corridors and woodland planting. These measures could help to reduce adverse effects on the SSSIs (see **Appendix F**)	These sites should be subject to specific consultation with Natural England, some of which wil be addressed as the Hoo Peninsula Strategic Environmental Programme develops. Based on available information at the time of writing, there is potential for the MLP to result in a residual adverse impact on SSSIs within the Plan area. **A potential long-term significant effect on nationally designated biodiversity sites is identified at this stage.**
Threats or pressures to locally designated and non-statutory biodiversity sites Adverse impacts due to development proposed in the MLP on locally designated sites could potentially include direct impacts such as habitat loss and/or indirect impacts such as increased recreational disturbance and increased risk of water or air pollution caused by visitors to these sites. One allocated site (Site RWB2) is located adjacent to 'Baty's Marsh' LNR. Additionally, 11 allocated sites are located in close proximity to a LNR. Three allocated sites (Sites CHR14, GS2 and LW8) coincide with LWSs, a further three allocated sites (Sites HW3, LW4 and LW7) are located adjacent to an LWS.	• Policy **S2** promotes the conservation, restoration and enhancement of LNRs, LWSs and ancient woodland, by recognising the protection given by these designations and non-statutory sites, ensuring it can be demonstrated that significant harm to biodiversity would be avoided. • The Kent and Medway Local Nature Recovery Strategy is currently in progress, which is likely to encourage opportunities to improve habitat connectivity.	The MLP policies will be likely to mitigate adverse impacts arising from development proposals which are situated in close proximity to locally designated and non-statutory biodiversity assets. However, the MLP policies will not be expected to fully mitigate adverse effects on sites which coincide with LWSs (Sites CHR14, GS2 and LW8), or for sites which are directly adjacent to a LNR or LWS, where there is potential for direct habitat loss or degradation of the habitats associated with the designations. **A potential long-term significant effect on locally designated and non-statutory biodiversity sites is identified.**
Fragmentation of the ecological network The majority of allocated sites (76) are located on previously undeveloped land and/or contain some land with potential	• Policy **S2** promotes the conservation, restoration and enhancement of ancient woodland. In addition, development proposals will provide a measurable net gain of 10% BNG in line with national	The MLP policies are likely to enhance habitat connectivity and strengthen the resilience of ecological and GI networks against current and future pressures. They support the

Identified effects on biodiversity, flora and fauna	Mitigating MLP policies	Summary of residual effect
environmental value where there is a risk of fragmentation or loss of habitats. Some 19 allocated sites coincide with priority habitat, including deciduous woodland, mudflats, coastal saltmarsh and traditional orchard. Four allocated sites (HHH12, LW4. LW6 and LW8) coincide with ancient woodland, as well as a further 14 sites located adjacent or in close proximity to ancient woodland. Eight allocated sites coincide with open mosaic habitats. Potential impacts associated with loss of habitats includes: • **Direct impacts**: Permanent loss of priority habitat in short term. • **Secondary impacts**: Such as reduced habitat connectivity and increased fragmentation, with increased fragility of habitats. • **Indirect effects**: Reduced ecological coherence.	requirements. The Kent and Medway Local Nature Recovery Strategy is currently in progress, which is likely to encourage opportunities to improve habitat connectivity. • Policy **S5** encourages the use of green infrastructure to provide protection for locally designated sites and non-statutory biodiversity sites. • Policy **T1 (Promoting high quality design)** protects existing trees and aims to establishes new landscape features that promote biodiversity. • Site Policy **SA7 (Capstone Valley)** requires a GI strategy to inform allocations, that will include buffers around ancient woodland and new street trees. • The accompanying masterplan to two allocated strategic sites (LW6 and LW8) indicates that ancient woodland and priority habitats will be retained as part of the development proposals (see **Appendix F**).	conservation and expansion of GI coverage, along with the creation of new habitats, providing opportunities to improve connections between biodiversity features. Additionally, the policies promote the principles of the emerging Kent and Medway Local Nature Recovery Strategy. **Overall, a long-term positive impact on green infrastructure opportunities is anticipated.**

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9 Climatic factors

9.1 Baseline

9.1.1 Anthropogenic climate change is predominantly the result of greenhouse gas (GHG) emissions. GHGs are emitted from a wide variety of sources, including transport, construction, agriculture and waste. New development is likely to lead to a net increase in GHG emissions, although efforts can be made to help limit these increases.

9.1.2 The Climate Change Act 2008[72] is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide (CO_2) and other GHGs are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements.

9.1.3 The Committee on Climate Change (CCC) report 'Net Zero – The UK's contribution to stopping global warming'[73] recommended new emission targets: reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050. The CCC's latest progress report[74] discusses the need for further measures to be implemented to ensure the UK meets the next target of reducing emissions in 2030 by 68% compared to 1990 levels.

9.1.4 Medway Council declared a Climate Emergency in April 2019[75].

Renewable energy

9.1.5 One strategy to combat GHG emissions is to reduce the quantity of energy produced via fossil fuel led energy production[76]. Over the last four years there has been an increase in the volume of energy generated through renewable sources within Medway (see **Table 9.1**) and decreasing reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn would reduce Medway's contributions towards the causes of climate change.

Table 9.1: *Total renewable energy generation in Medway between 2020 and 2023*[77]

Renewable Energy Generation (MWh)	2020	2021	2022	2023
Medway	31.2	32.3	33.7	36.4

[72] Climate Change Act 2008. Available at: www.legislation.gov.uk/ukpga/2008/27/contents [Date accessed: 07/01/25]

[73] CCC (2019) Net Zero – The UK's contribution to stopping global warming. Available at: www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/ [Date accessed: 07/01/25]

[74] CCC (2024) Progress in reducing emissions: 2024 Report to Parliament. Available at: https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/ [Date accessed: 07/01/25]

[75] Medway Council (2021) Climate Change. Available at: www.medway.gov.uk/climatechange [Date accessed: 07/01/25]

[76] RTPI (2018) Renewable Energy: Planning's role in delivering renewable energy in the new ow carbon economy. Available at: www.rtpi.org.uk/research/2018/june/renewable-energy/ [Date accessed: 29/04/25]

[77] DBEIS (2019) Renewable electricity by local authority. Available at: www.gov.uk/government/statistics/regional-renewable-statistics [Date accessed: 07/01/25]

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9.1.6 The layout and design of development can have benefits to sustainability and reducing contributions to climate change. The MLP could potentially help encourage the development of more energy efficient homes to help reduce the overall carbon emissions of Medway, such as Eco Houses, Zero Carbon Homes and Passivhaus[78].

Carbon emissions

9.1.7 The requirement to improve the energy efficiency of homes stems from the legal requirements to reduce CO_2 emissions set out in the Climate Change Act 2008 and the government's Net Zero Strategy 2021. The Net Zero Strategy sets out to reduce GHG emissions by 55% by 2025, 68% by 2030, 78% by 2035 and 100% by 2050[79]. It will therefore be an important role of the MLP to encourage sustainable development and construction and support low carbon energy sources. The Medway Refreshed Climate Change Action Plan 2022[80] will look to address these issues.

9.1.8 The largest source of CO_2 emissions in Medway is from domestic related emissions, followed closely by transport related emissions[81]. It is likely that residential development proposed within the MLP will result in an associated increase in domestic emissions, as well as an increase in the number of vehicles on the road in the Plan area with a consequent increase in transport emissions, contributing to the Greenhouse Effect and exacerbating anthropogenic climate change.

9.1.9 Around 1 in 10 tonnes of the UK's total GHG emissions are embodied emissions, totalling 64 million tonnes of CO_2 a year[82]. Local Plans should consider embodied carbon, which is present throughout the whole lifecycle of a building or infrastructure (see **Figure 9.1**).

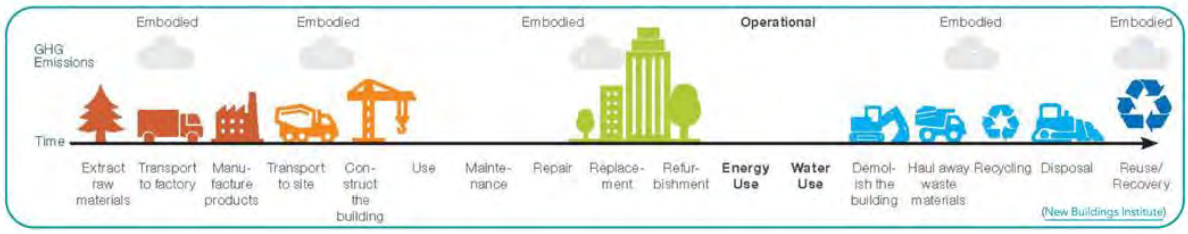

Figure 9.1: *Embodied and operational GHG emissions*[83]

[78] HM Government (2021) Net Zero Strategy: Build Back Greener. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf [Date accessed: 07/01/25]

[79] Ibid

[80] Medway Council (2023) Climate Change Action Plan. Available at: www.medway.gov.uk/climatechangeplan [Date accessed: 07/01/25]

[81] DESNZ (2024) UK local authority and regional greenhouse gas emissions and national statistics 2005 to 2022. Available at: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022 [Date accessed: 27/03/25]

[82] Policy Position Paper: Embodied carbon regulation – alignment of industry policy recommendations. January 2024. Available at: www.istructe.org/getattachment/05855cb7-990a-477e-8672-9329aa3307ca/attachment.aspx [Date accessed: 07/01/25]

[83] UK GBC. Operational and Embodied Carbon. Explainer Guide. Available at: https://ukgbc.org/wp-content/uploads/2023/02/operational-and-embodied-carbon-1.pdf [Date accessed: 07/01/25]

Flooding and extreme weather events

9.1.10 Climate change is anticipated to increase the risk of extreme weather events. Of particular concern in the UK is the increasing frequency and severity of fluvial, surface water and coastal flooding. Flooding is the most significant issue related to climate change impacts in the MLP area.

9.1.11 The occurrence of extreme weather events is likely to increase in the near future due to the changing climate, with implications for flood risk and drought (see also **Chapter 15** – Water). A complex network of waterways course through the Local Plan area, forming tributaries to the River Thames and/or River Medway. Associated with these waterways are differing extents of tidal, fluvial and surface water flood risk (see **Figures 9.2** and **9.3**).

9.1.12 Coastal squeeze[84] poses a significant challenge for Medway, where rising sea levels driven by climate change force coastal habitats to migrate inland to avoid submersion. Coastal habitats play a critical role in providing essential ecosystem services such as flood protection, carbon sequestration, and support for biodiversity; all of which are at risk from coastal squeeze. To address these concerns, the Medway Estuary and Swale (MEAS) flood and coastal risk management strategy[85] focuses on managing the coastline to protect people, properties, protected habitats, and agricultural land over the next 100 years.

9.1.13 The MEAS area is recognised for its ecological importance, reflected in its national and international designations, including SPAs, Ramsar sites, SSSIs, and the MCZ. These designations underscore the coastline's value as a habitat for breeding, feeding, and shelter. As part of its long-term strategy, the MEAS strategy plans to create new intertidal areas to replace habitats lost to coastal squeeze, ensuring the region's natural ecosystems can continue to thrive despite the challenges posed by climate change.

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[84] Medway Swale Estuary Partnership (2021). What is coastal squeeze? Available at: https://msep.org.uk/what-is-coastal-squeeze/ [Date accessed: 22/01/25]
[85] Environment Agency (2024). Medway Estuary and Swale flood and coastal risk management strategy. Policy Paper. Available at: www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy#find-out-more [Date accessed: 13/01/25]

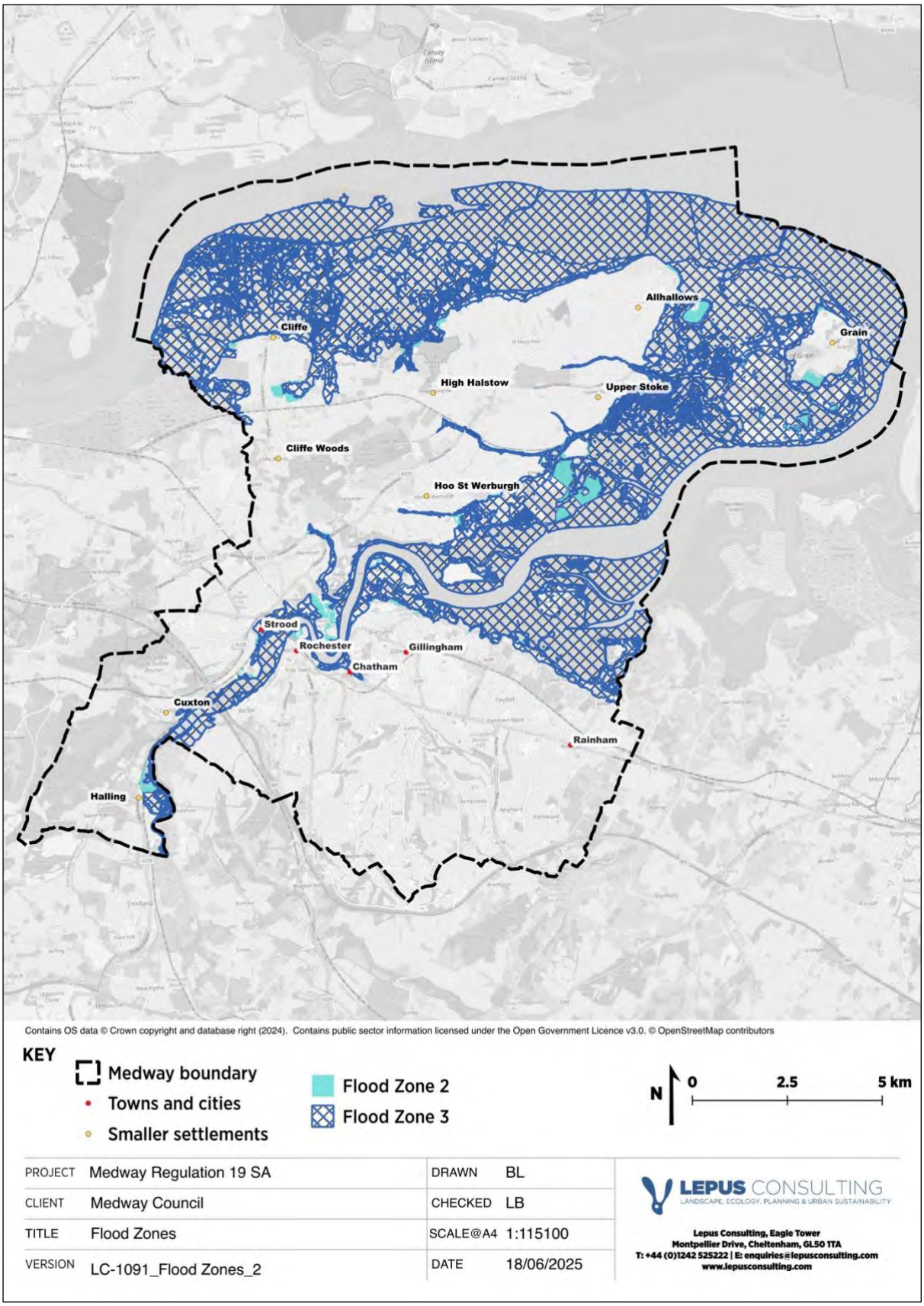

Figure 9.2: *Flood Zones within Medway*

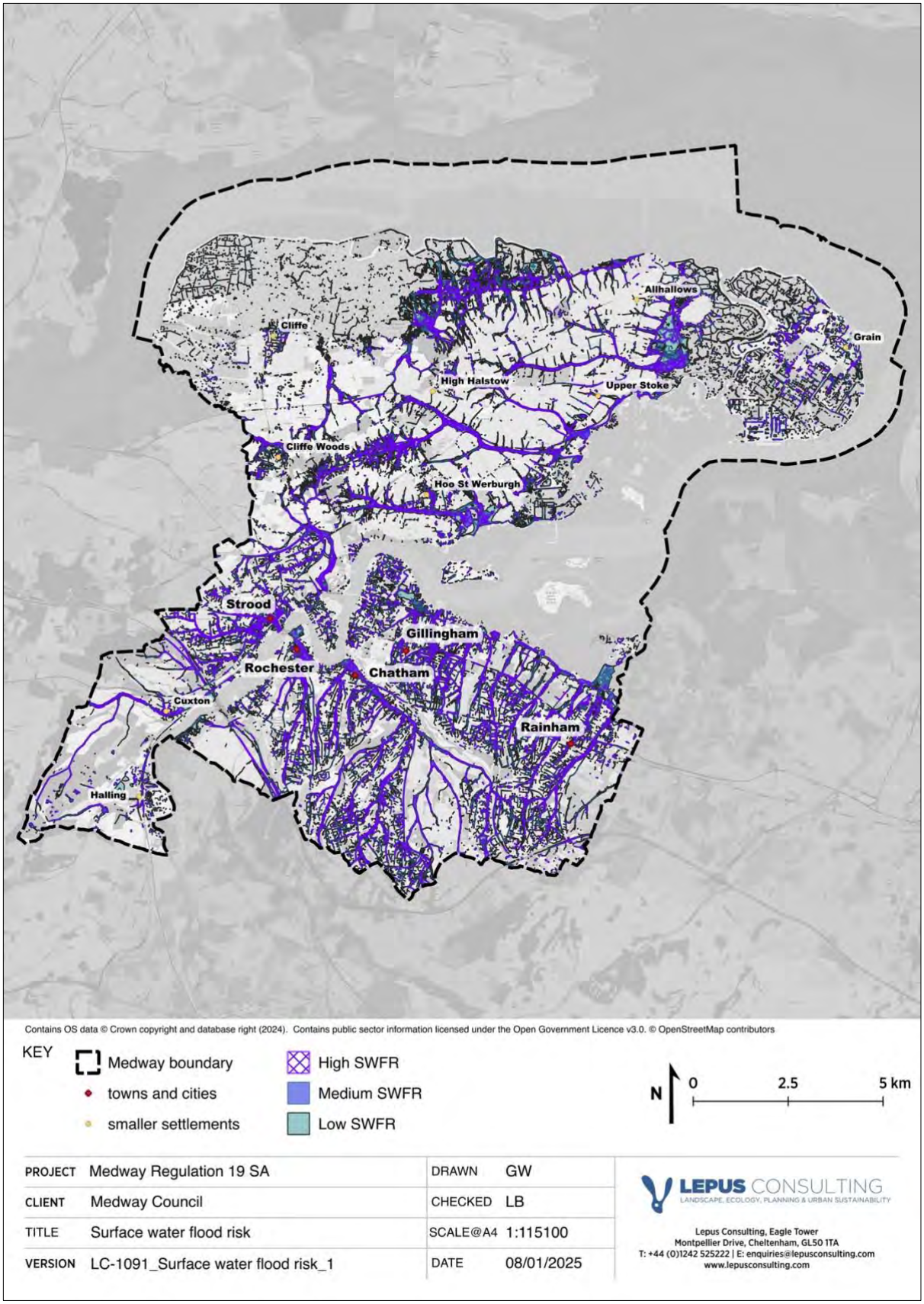

Figure 9.3: *Surface water flood risk within Medway*

Green Infrastructure

9.1.14 Natural England's GI Framework[86] seeks to ensure that LPAs and developers can meet the requirements in the NPPF to consider GI in local plans and in new development in a way that will recognise and maximise the multi-functional benefits of GI. GI has many benefits including, human health and wildlife value[87] and can play an important role in helping urban areas adapt to climate change, by filtering airborne pollutants, providing shade and local cooling and reducing surface water runoff[88].

9.1.15 Development through the MLP such as site allocations on undeveloped land, or development that will result in a net loss of GI / vegetation, could potentially result in a reduced capability of the environment to provide ecosystem services including carbon storage and reducing surface run-off. Loss of previously undeveloped land has been considered within **Chapter 14 – Soil**.

9.1.16 Throughout the SA process, climate change has been considered under SA Objectives 1 (Climate Change Mitigation) and SA Objective 2 (Climate Change Adaptation). However, it should be noted that climate change is a cross-cutting theme with relevance across all objectives of the SA Framework and SEA topics.

Box 9.1: *Summary of key issues for climatic factors in Medway*

Key issues for climatic factors include:

⇒ Medway is a coastal authority and therefore at risk of flooding and sea level rise.

⇒ Increased number of vehicles on the road will exacerbate congestion, which is likely to be the major source of greenhouse gas emissions within Medway.

⇒ GI should be enhanced and expanded to maximise ecosystem services and climate resilience.

⇒ New development needs to incorporate energy efficiency measures and climate change adaptive features in order to respond to predicted levels of climate change.

9.2 Evaluating the effect of the MLP on climatic factors

9.2.1 **Table 9.2** presents a plan-wide summary of the identified effects of the MLP on climatic factors that have been identified through the SA process, considers how the MLP policies will help to reduce or mitigate these effects, and explores the nature of residual effects.

[86] Natural England (2023) Green Infrastructure Framework. Available at: www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework [Date accessed: 29/04/25]

[87] Forest Research (2010) Benefits of green infrastructure. Available at: www.forestresearch.gov.uk/publications/benefits-of-green-infrastructure/ [Date accessed: 29/04/25]

[88] Landscape Institute (no date) Green Infrastructure (GI). Available at: www.landscapeinstitute.org/policy/green-infrastructure/ [Date accessed: 29/04/25]

Table 9.2: *Summary of identified effects of the MLP on climatic factors*

Identified effects on climatic factors	Mitigating MLP policies	Summary of residual effect
Risk of fluvial and tidal flooding (present and future) Development within Flood Zones 2 or 3 will locate site end users in areas at risk of fluvial flooding, may increase the risk of damage to property and increase risks to human health in the immediate area and/or contribute to exacerbation of flood risk in the surrounding areas. The majority of allocated sites lie in Flood Zone 1; however, 32 sites coincide with some areas of Flood Zone 3, and three sites with Zone 2. Notably, ten of these sites (SNF38, SNF31, SNF34, HHH32, CCB8, SNF24, SNF23, SNF30, SNF35 and CCB27) lie wholly within Flood Zone 3, and a further 14 sites where more than 50% of the site area lies within Flood Zone 3.	• Policy **DM1 (Flood and water management)** seeks to minimise flood risk through providing site-specific flood risk assessments by carrying out Sequential and Exception testing, and through providing flood risk management infrastructure where required. This includes locating development in areas of low flood risk, maintaining flood risk infrastructure, and contributing towards to Environment Agency's flood risk management programme. • Policy **S5 (Securing strong green and blue infrastructure)** encourages the use of GI to manage flood risk and adapt to the impacts of climate change. • Both Policy **T28 (Existing open space, outdoor sports and play spaces)** and Policy **DM21 (New open space, outdoor sports and play spaces)** encourage the use of well-managed open spaces to help mitigate flood risk. • Site Policy **SA13 (Frindsbury Peninsula Opportunity Area)** highlights the emerging Planning Framework that will guide development in the area including delivery of strategic flood risk infrastructure.	Allocated sites that did not pass the Sequential Test[89] with regard to fluvial/tidal flood risk have been considered in more detail within the Level 2 SFRA[90], which includes application of the Exception Test. The SFRA includes a summary of required actions and recommended mitigation measures to ensure that development will be safe and consistent with national policy. **There are anticipated to be no significant adverse effects associated with development proposed in the MLP on fluvial/tidal flooding, subject to achieving the recommendations set out in the SFRA, including completion of further site-specific flood risk assessments.**
Surface water flood risk Development in areas of surface water flood risk may lead to safety implications for site end users, and further exacerbate flood risk in the surrounding area. A total of 83 allocated sites coincide with varying extents of surface water flood risk, including 34 sites which coincide with areas of high risk.	• Policy **DM1** seeks to minimise surface water flood risk through providing site-specific flood risk assessments and providing flood risk management infrastructure where required. This includes preparing Surface Water Drainage Strategies including the implementation of SuDs which replicate greenfield runoff rates. • Policy **S5** encourages the use of green infrastructure to manage surface water flood risk and includes the implementation and management of SuDs. • Policies **T28** and **DM21** both encourage the use of well-managed open spaces to help mitigate surface water flood risk. • The accompanying masterplan information for five allocated strategic sites (HHH26, HHH36, LW8, SMI6 and SNF3) indicate that SuDS, GI provision and surface water drainage systems will be implemented.	Allocated sites that did not pass the Sequential Test[91] with regard to SWFR have been considered in more detail within the Level 2 SFRA[92], which includes application of the Exception Test. The SFRA includes a summary of required actions and recommended mitigation measures to ensure that development will be safe and consistent with national policy. **There are anticipated to be no significant adverse effects associated with development proposed in the MLP on SWFR, subject to achieving the recommendations set**

[89] Herrington (2025) Flood Risk Sequential Test Report – Medway Council. Draft, March 2025.

[90] Herrington (2025) Level 2 Strategic Flood Risk Assessment – Medway Council. Draft, May 2025.

[91] Herrington (2025) Flood Risk Sequential Test Report – Medway Council. Draft, March 2025.

[92] Herrington (2025) Level 2 Strategic Flood Risk Assessment – Medway Council. Draft, May 2025.

Identified effects on climatic factors	Mitigating MLP policies	Summary of residual effect
		out in the SFRA, including completion of further site-specific flood risk assessments.
Reduced viability of flood defences In line with EA advice[93], development coincident with flood defence schemes, or within 20m of the toe of a proposed/existing flood defence, is considered unlikely to be able to safeguard the viability of future flood defences and has potential to increase future flood risk in the Plan area. Some 14 allocated sites coincide or are within 20m of the toe of a proposed/existing flood defence.	• Policy **DM1** states that *"development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted unless it can be suitably mitigated".* This includes continued inspection, maintenance, repair and replacement of the existing flood defences. • Site Policy **SA4 (River Waterfront)** outlines required flood mitigation and/or a flood defence wall to enable delivery of allocated sites in the waterfront area of north Gillingham. • The accompanying masterplan for Site HHH36 includes the provision of a green buffer to the existing flood defence, ensuring that no built development occurs within 20m of the flood defence (see **Appendix F**).	The MLP policies will be expected to protect future and existing flood defences from development and ensure delivery of new defences where required as part of the MEAS strategy[94]. **There are anticipated to be no significant adverse effects associated with development proposed in the MLP on the viability of flood defences.**
Increased GHG emissions The proposed development of 21,194 homes and a significant amount of new employment floorspace within Medway will be likely to increase GHG emissions to some extent through increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions, and the production and use of materials during construction / release of embodied carbon associated with redevelopment sites. This impact will be expected to contribute towards cumulative effects which exacerbate global climate change issues such as sea level rise and extreme weather events.	• Policy **S1 (Planning for climate change)** ensures that development proposals will include opportunities for adaptation to, and the mitigation of climate change to progress towards achieving net zero carbon in Medway by 2050. The policy includes measures to promote effective spatial planning, use of renewable and low carbon technologies and design, delivery of green infrastructure, and management of water resources and flood risk. • The criteria of Policy S1 are underpinned by Policy **DM3 (Air quality),** Policy **DM6 (Sustainable design and construction),** Policy **S25 (Energy supply)** and Policy **T41 (Heat networks),** collectively aiming to reduce Medway's carbon footprint. • Site Policy **SA8 (Hoo St Werburgh and Chattenden)** requires potential for a district heating network to be explored via the strategic development framework and masterplan. • Several site policies encourage development to re-use or renovate existing buildings rather than demolishing and rebuilding, to minimise embodied carbon emissions.	Although the relevant MLP policies will be expected to have a positive impact in helping to reduce GHG emissions, particularly in regard to energy efficient design and low carbon sources, these measures are not expected to fully mitigate the impacts associated with the large quantum of growth expected from the Plan. **An increase in GHG emissions as a consequence of the proposed development is expected to be a long-term and permanent significant effect.**

[93] Environment Agency (2025) Guidance: National flood risk standing advice for local planning authorities. Available at: https://www.gov.uk/guidance/flood-risk-assessment-local-planning-authorities [Date accessed: 10/04/25]

[94] Environment Agency (2024) Medway Estuary and Swale flood and coastal risk management strategy. Available at: www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy [Date accessed: 29/04/25]

Identified effects on climatic factors	Mitigating MLP policies	Summary of residual effect
Loss of multi-functional GI Although the MLP allocates 55 sites located wholly on previously developed land, the proposed development of the remaining 76 allocations will cumulatively result in the loss of a significant area of previously undeveloped land or land with environmental/ecological value. Multi-functional GI is vital in helping to reduce adverse impacts of climate change.	• The **Spatial Development Strategy** encourages development proposals to make use of previously developed land and invest in urban areas. • Policy **S2 (Conservation and enhancement of the natural environment)** encourages development to be located away from biodiversity designations, restoring and enhancing biodiversity across the Plan area. • Policy **S4 (Landscape protection and enhancement)** aims to contain urban sprawl and therefore limit development on greenfield land. • Policy **S5** will help to conserve and enhance the GI network in the borough. • Policy **S7 (Green Belt)** supports the provision of a strong green belt, promoting development away from the countryside and within the urban area. • Several site policies require GI Strategies to guide allocations, and/or set out specific GI requirements in development areas to secure multifunctional benefits.	Although there may be some loss of previously undeveloped land associated with development sites that comprise or contain greenfield land, various MLP policies seek to conserve and enhance multi-functional green and blue infrastructure across the Plan area as a whole. **Supporting the delivery of GI throughout the Plan area, a positive effect is expected with regard to Medway's ability to adapt to climate change.**

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10 Cultural heritage

10.1 Baseline

10.1.1 Historic environment priorities from international to local levels seek to address a range of issues, particularly in relation to the conservation and enhancement of heritage assets that are irreplaceable and play an important role in placemaking and the quality of life.

10.1.2 National and local policy and guidance seeks to protect the significance of designated and non-designated heritage assets and their settings.

10.1.3 Various PPPs seek to ensure that cultural aspects of landscapes are recognised and protected against inappropriate development, encourage recognition of the potential and actual value of unknown and undesignated assets, as well as the conservation and enhancement of sites and landscapes of archaeological and heritage interest so that they may be enjoyed by both present and future generations.

Designated features

10.1.4 The Medway Heritage Asset Review[95] states that there are 720 relevant entries in the national list of buildings of special architectural or historic importance within the Plan area:

- 49 Grade I Listed Buildings;
- 78 Grade II* Listed Buildings;
- 515 Grade II Listed Buildings;
- 76 Scheduled Monuments (SMs); and
- Two Registered Parks and Gardens (RPGs).

10.1.5 Medway has 24 Conservation Areas, seven of which have published Conservation Area Appraisals[96]. Since 2008, Historic England has released an annual Heritage at Risk Register, which in Medway includes 16 historic assets[97]. Listed Buildings are shown on **Figure 6.1**, with other designations shown on **Figure 6.2**.

10.1.6 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. The level of the impact has been assessed based on the nature and significance of, and proximity of the proposal to, the heritage asset in question. Adverse impacts on heritage assets can include direct loss or truncation of an asset, impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. These negative impacts are expected to be long-term and irreversible. It is assumed that designated heritage assets will not be lost as a result of development, unless otherwise specified by the MLP.

[95] Medway Council (2017) Heritage Asset Review. Available at www.medway.gov.uk/downloads/file/2368/heritage_asset_review [Date accessed: 29/04/25]

[96] Medway Council (2021) Conservation Area Appraisals. Available at www.medway.gov.uk/downloads/download/47/conservation_area_appraisal [Date accessed: 29/04/25]

[97] Historic England (2025) Heritage at Risk Register. Available at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/results/?search=Medway&searchType=HAR [Date accessed: 29/04/25]

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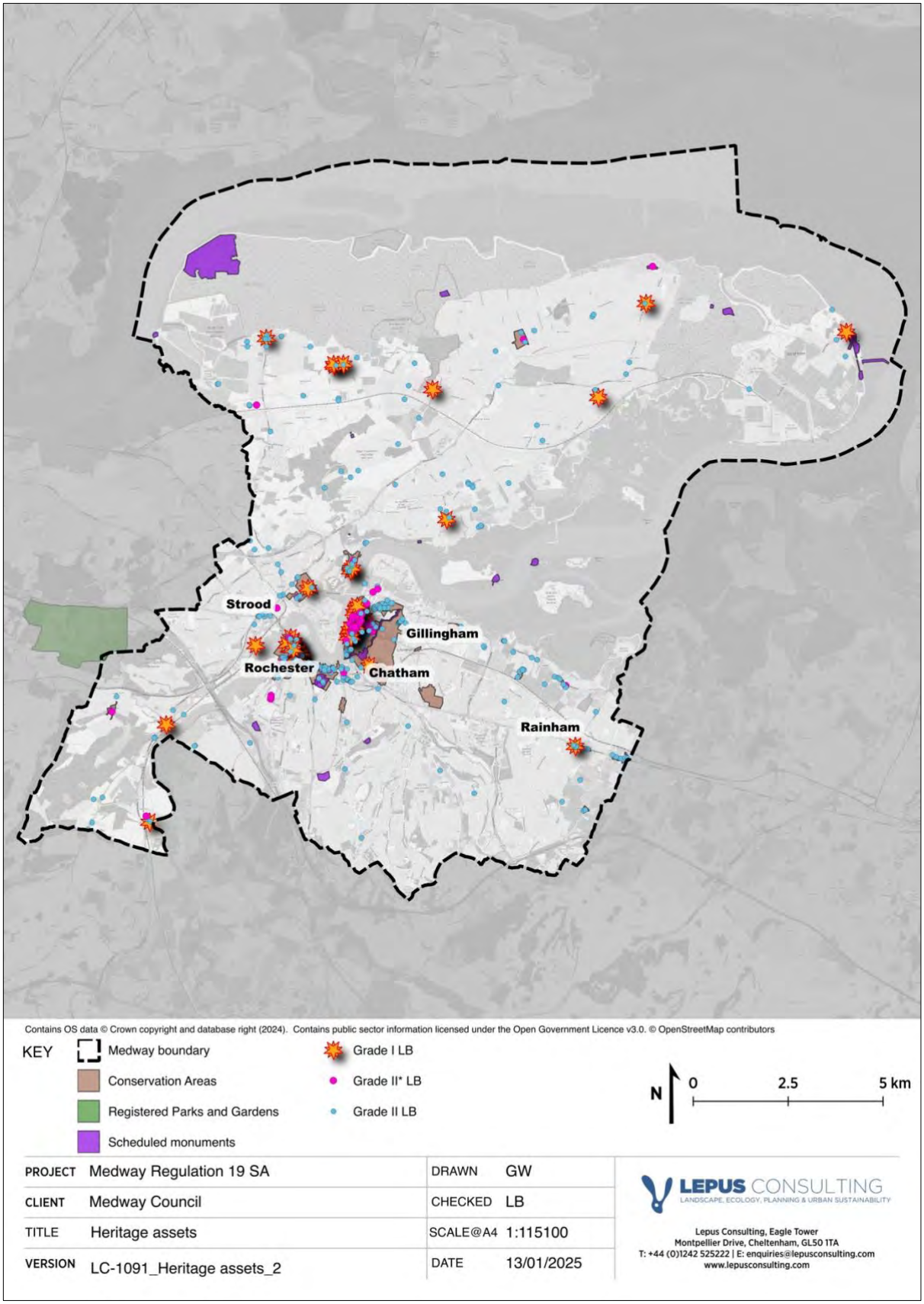

Figure 10.1: *Heritage assets within Medway*

Non-designated features

10.1.7 Non-designated features comprise a significant aspect of heritage. This may include buildings and other features of historic interest which are not listed, as well as both discovered and undiscovered archaeological remains.

10.1.8 Historic England advocate seeking opportunities for delivering heritage-led regeneration[98], creating, revealing or enhancing local distinctiveness, encouraging the use of traditional building skills, and promoting climate change resilience and innovative reuse of historic buildings where appropriate. Engaging with and celebrating cultural heritage also provides a number of opportunities to benefit wellbeing, social inclusion and equality[99].

10.1.9 In November 2023, Medway was selected by The National Lottery Heritage Fund as one of nine locations set to receive a share of £200 million in funding under the 'Heritage Places' initiative[100]. The scheme aims to respond to local needs, supporting places to use heritage to build pride in place, inspire local communities and power regeneration.

10.1.10 Heritage assets are predominantly considered under SA Objective 9 'Cultural Heritage', which seeks to enhance, conserve and manage sites, features and areas of historic and cultural importance.

Box 10.1: *Summary of key issues for cultural heritage in Medway*

Key issues for cultural heritage include:

⇒ Medway's rich heritage is at threat of being compromised to meet housing demand.

⇒ There are numerous historic buildings that are listed.

⇒ Medway includes heritage assets identified as heritage at risk.

⇒ Archaeological remains, both seen, and unseen have the potential to be affected by new development areas.

10.2 Evaluating the effect of the MLP on cultural heritage

10.2.1 **Table 10.1** presents a plan-wide summary of the identified effects of the MLP on cultural heritage that have been identified through the SA process, considers how the MLP policies will help to reduce or mitigate these effects, and explores the nature of residual effects.

[98] Deloitte (2017) Heritage Works: A toolkit of best practice in heritage regeneration. Available at: https://historicengland.org.uk/images-books/publications/heritage-works/ [Date accessed: 07/01/25]

[99] Historic England (2018) Wellbeing and the Historic Environment. Available at: https://historicengland.org.uk/images-books/publications/wellbeing-and-the-historic-environment/wellbeing-and-historic-environment/ [Date accessed: 08/01/25]

[100] Medway Council (2023). Medway Heritage Place Project. Available at: www.medway.gov.uk/HeritagePlace#:~:text=The%20Medway%20Heritage%20Place%20programme,new%20ways%20for%20new%20audiences. [Date accessed: 07/01/25]

Table 10.1: *Summary of identified effects of the MLP on cultural heritage*

Identified effects on cultural heritage	Mitigating MLP policies	Summary of residual effect
Alter the character and/or setting of designated heritage assets Development which coincides with or is located in close proximity to heritage assets has the potential to affect both the asset itself and its setting. This will depend on contextual factors relating to the nature and location of development and factors that contribute to the significance of heritage assets, including its setting. Site SR25 coincides with a Grade I Listed Building (listed as 'Barn 30 Yards South West of The Manor House') which is also at risk[101]. The proposed development at this site could exacerbate the deterioration of the medieval barn's structure. Two allocated sites (CCB25 and CCB35) are adjacent to, and four allocated sites (HHH12, RWB11, SNF41 and SR53) in proximity to, other Grade I Listed Buildings. Two allocated sites (CCB1 and CCB35) are located adjacent to a Grade II* Listed Building and a further seven allocated sites are located within close proximity to a Grade II* Listed Building. Four allocated sites (CCB35, HHH24, HHH33 and SR49) coincide with a Grade II Listed Building. A further nine sites are located adjacent to, and 21 sites within close proximity to, a Grade II Listed Building. Site CCB35 coincides with an SM, listed as 'Chatham Dockyard, the Expense Account Dept Wages Division'. Site FP6 coincides with 'New Road, Rochester' SM. Site HHH12 is adjacent to 'Cockham Wood Fort' SM and a further nine allocated sites are located in close proximity to an SM. Site FP6 is located approximately 100m from the 'Jewish Burial Ground, Chatham Memorial Synagogue' RPG.	• Policy **S8 (Historic environment)** supports development that "*positively contributes to local distinctiveness and character*", and *"preserves or enhances the significance of designated and non-designated heritage assets and their settings."* This includes sensitive and sustainable reuse of heritage assets, especially those 'at risk'. • Policy **DM9 (Heritage assets)** promotes high quality design that seeks to enhance the significance and setting of heritage assets. A Heritage Statement will be required for development in proximity to heritage assets. • Policy **S9 (Star Hill to Sun Pier)** focuses on conserving and enhancing assets within the identified Heritage Action Zone (HAZ)[102]. • Policy **DM11 (Scheduled monuments and archaeological sites)** does not permit development which adversely impacts SMs or their setting. • Policy **T1 (Promoting high quality design)** encourages developments which respond to the character and appearance of their settings. • Site Policy **SA5 (Strood District Centre and Surrounds)** will ensure development sensitively addresses Rochester Castle and its setting.	Adverse impacts on the character and setting of designated heritage assets including listed buildings and their settings are anticipated to be mitigated through various MLP policies. A range of plans, programmes and legislation including the NPPF, as well as local guidance also affords protection to heritage assets in line with their significance. **The MLP will be expected to help avoid or mitigate the potential for significant impacts on designated heritage assets arising from proposed development, with a negligible impact identified overall.** **Effective design policies such as T1, DM6, S8 and DM9 are likely to deliver positive effects for the urban realm.**

[101] Historic England (2025) Heritage at Risk Register: Barn 30 yards south east of the manor, Upnor Road (south side), Frindsbury Extra - Medway (UA). Available at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/49126 [Date accessed: 14/04/25]

[102] Historic England (2024). Heritage Action Zones: Breathing New Life Into Old Places Available at: https://historicengland.org.uk/services-skills/heritage-action-zones/ [Date accessed: 15/04/25]

Identified effects on cultural heritage	Mitigating MLP policies	Summary of residual effect
Alter character and/or setting of Conservation Areas Development within or in proximity to a CA has the potential to adversely impact the character and special architectural or historic interest of the CA and/or its setting. Some 15 allocated sites wholly or partially coincide with a CA. Five allocated sites (CCB4, FP12, FP25, SR48 and SR53) are located adjacent to a CA. A further seven allocated sites are located within close proximity to a CA.	• Policy **S8** supports development that "*positively contributes to local distinctiveness and character".* • Policy **DM10 (Conservation areas)** only permits development within a CA where it *"contributes positively to the conservation and enhancement of the character, appearance and distinctiveness of the area."* • Site Policy **SA2 (Heritage-led Sites)** will ensure sensitive redevelopment of sites within Star Hill to Sunpier CA and Chatham Historic Dockyard CA. • Site Policy **SA13 (Frindsbury Peninsula Opportunity Area)** requires development to have regard to the setting of nearby CAs including Frindsbury and Manor Farm.	Adverse impacts on the character and setting of CAs are anticipated to be mitigated through various MLP policies. **The MLP will be expected to help avoid or mitigate the potential for significant impacts on conservation areas arising from proposed development, with a negligible impact identified overall.**

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11 Human health

11.1 Baseline

11.1.1 National and local health strategies and policies seek to promote the development of healthy communities, such as through delivering age-friendly environments for the elderly, encouraging healthier food choices and facilitating active travel. In line with the NPPF, LPAs should seek to promote social interaction, create communities which are safe and accessible, and ensure there is good accessibility to a range of GI, sports facilities, local shops, cultural buildings and outdoor space.

11.1.2 Key PPPs include Public Health England's Strategy for 2020–2025[103] which sets out priorities within the health system including a focus on addressing health inequalities.

Air quality

11.1.3 As discussed in detail within **Chapter 7**, air pollution is a significant concern internationally, nationally and locally, with an average of 6.4% of mortality in Medway being attributed to particulate air pollution[104].

11.1.4 Development proposals located in close proximity to AQMAs or main roads would expose site end users to transport associated noise and air pollution, with adverse impacts on health and wellbeing.

Health and wellbeing

11.1.5 Estimates of personal wellbeing in the UK are published by the ONS annually, with scores for anxiety, happiness, life satisfaction, and feeling that life is worthwhile. Overall scores are based on surveying a representative sample of the population and are scored out of 10 (e.g. for happiness 0 is 'not at all happy' and 10 is 'completely happy'). Medway recorded a 7.3 for overall happiness in 2023[105].

11.1.6 The health statistics for Medway varies slightly from that of England. For example, the deprivation is higher, and the average life expectancy is lower than that of England. Medway also has a lower proportion of adults that are physically active and greater proportion of overweight/obese adults than the national average and South East region. A summary of the Public Health Profiles is shown in **Table 11.1**.

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[103] Public Health England (2019) PHE Strategy 2020 to 2025. Available at: www.gov.uk/government/publications/phe-strategy-2020-to-2025 [Date accessed: 07/01/25]

[104] Office for Health Improvement and Disparities (2023) Public Health Profiles: Fraction of mortality attributable to particulate air pollution (new method). Available at: https://fingertips.phe.org.uk/search/air%20pollution#page/4/gid/1/pat/15/ati/401/are/E06000035/iid/93861/age/230/sex/4/cat/-1/ctp/-1/yrr/1/cid/4/tbm/1 [Date accessed: 06/01/25]

[105] Demographics of Medway. Available at: www.varbes.com/demographics/medway-demographics [Date accessed: 06/01/25]

Table 11.1: *Health statistics for Medway in comparison with the regional and national average (2023)*[106]

	Deprivation score (IMD 2019)	Male life expectancy (yrs)	Female life expectancy (yrs)	Suicide rate (per 100,000)	Physically active adults (%)	Overweight / obese adults (%)
Medway	23.9	78.7	82.5	12.0	62.9	68.1
South East	15.5	80.6	84.1	10.4	70.2	62.8
England	21.7	79.3	83.2	10.3	67.1	64.0

Healthcare facilities

11.1.7 Ideally, residents should be within an approximate ten-minute walking distance to their nearest GP surgery, whilst a hospital within 5km would be considered a sustainable distance. Where distances to important health services exceed these guidelines, sustainable transport modes such as frequent and affordable bus routes should be available to residents.

11.1.8 There is only one NHS hospital with an A&E department in the Plan area: Medway Maritime Hospital. Other hospitals (some of which are private and may not be generally accessible) in or around the Plan area include Spire Alexandra Hospital, KIMS Hospital, Little Brooke Hospital and Maidstone Hospital. There are approximately 60 GP surgeries, some of which are private medical facilities, located predominantly in the south of the Plan area. The location of healthcare facilities is shown on **Figure 11.1**.

11.1.9 New housing developments can increase demand on local healthcare services. The government provides guidance for GP capacity for large scale developments[107] as well as resources for planning and designing healthier places[108].

Green spaces and natural habitats

11.1.10 In line with the NPPF, LPAs should seek to promote social interaction, create communities which are safe and accessible, and provide a range of GI and sports facilities. Opportunities to experience a diverse range of natural habitats and recreational spaces is known to be beneficial for physical and mental health. Good access to such areas can reduce stress, fatigue, anxiety and depression[109], as well as physical health indicators such as reduced rates of obesity and type 2 diabetes. Impacts of restricted access to the natural environment are particularly significant for lower socio-economic groups.

[106] Office for Health Improvement & Disparities (2024) Local Authority Health profiles: Medway. Available at: https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/6/ati/501/are/E06000035/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yrr/3/cid/4/tbm/1 [Date accessed: 29/04/25]

[107] UK Parliament (2022) General practice capacity for large-scale housing developments. Available at: https://commonslibrary.parliament.uk/research-briefings/cdp-2022-0067/ [Date accessed: 29/04/25]

[108] Public Health England (2017) Spatial Planning for Health: An evidence resource for planning and designing healthier places. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf [Date accessed: 29/04/25]

[109] Houlden. V., Weich. S. and Jarvis. S. (2017) A cross-sectional analysis of green space prevalence and mental wellbeing in England.

Box 11.1: *Summary of key issues for human health in Medway*

Key issues for human health include:

⇒ The increasing population in Medway will place pressure on the capacity of health infrastructure and leisure facilities without careful planning and integration of new infrastructure, especially in light of Medway's existing high patient-to-GP ratio.

⇒ The life expectancy of men and women is anticipated to rise over time, in line with national trends, leading to a greater proportion of older residents with specific needs for housing and services.

⇒ Residents in Medway have a slightly higher than average proportion of overweight adults and lower average life expectancy in comparison to the South East average and national average.

11.2 Evaluating the effect of the MLP on human health

11.2.1 **Table 11.2** presents a plan-wide summary of the identified effects of the MLP on human health that have been identified through the SA process, considers how the MLP policies will help to reduce or mitigate these effects, and explores the nature of residual effects.

Table 11.2: *Summary of identified effects of the MLP on human health*

Identified effects on human health	Mitigating MLP policies	Summary of residual effect
Sustainable access to healthcare / leisure facilities Some 44 allocated sites are located outside of the 5km sustainable target distance to Medway Maritime Hospital (the only local hospital providing an A&E service). Some 47 allocated sites are located outside the 800m sustainable target distance to a GP surgery. Some 73 allocated sites are located outside the 1.5km sustainable target distance to a leisure facility.	• Policy **T27 (Reducing health inequalities and promoting health and wellbeing)** aims to improve sustainable access to health and wellbeing facilities, reduce health inequalities, as well as requiring Health Impact Assessments for specific development proposals. • Policy **T26 (Accessibility standards)** requires new developments to meet standards for 15-minute journey times to local destination. This will, in turn, improve accessibility to healthcare provision. • Policies including **DM15, T4, T5, T10, T27, S14** and **S15** all encourage improved public transport provision and accessibility, which is likely to improve access to healthcare facilities. • Various site allocation policies include provisions of new healthcare hubs.	Local Plan policies, such as Policies T27 and T26, will help to prevent the loss of existing healthcare facilities and improve sustainable access to facilities for some residents; however, the policies will not be expected to fully mitigate the restricted access to healthcare services for sites in more isolated settlements. **Limited sustainable access to healthcare facilities is expected to be a medium-term and temporary significant effect.**

Identified effects on human health	Mitigating MLP policies	Summary of residual effect
Exposure to air / noise pollution (from AQMAs and main roads) The long-term health of residents, in particular vulnerable groups including children and the elderly, could be adversely affected by local reductions in air quality. Development within one of the four AQMAs within Medway or within 200m of a main road could potentially expose site end users to increased levels of traffic related air pollution or noise impacts, with adverse implications for health. This impact is discussed further in Chapter 7.	• Policy **DM3 (Air quality)** addresses air quality issues across Medway and promotes appropriate design to improve emissions, such as through the installation of electric charging points and introducing low NO_2 boilers. • The **Spatial Development Strategy**, Policy **T26 (Accessibility standards)** and Policy **DM20 (Cycle parking and storage)** aim to reduce reliance on cars and the need to travel through facilitating sustainable and active modes of transport. • Site Policy **SA1 (Chatham Town Centre and Surrounds)** will ensure air quality in Central Medway AQMA is addressed through the proposal design.	Several of the MLP policies are expected to reduce the likelihood and extent of potential adverse impacts on human health and biodiversity assets regarding air pollution. However, as a result of the proposed development in the MLP, the likely associated increases in traffic flows and reduction in air quality within an existing AQMA will be expected to have residual adverse effects which cannot be fully mitigated through the MLP policies. **Adverse effects on health as a result of poor air quality across Medway is expected to be a long-term significant effect, although the extent of this impact may reduce over time as clean technologies improve.**
Limited access / net loss of public greenspace Some 13 allocated sites are located outside the sustainable target distance of 600m to greenspace. The proposed development at three allocated sites (GN15, SNF35 and SR51) has potential to result in a net loss of green space owing to the presence of existing green spaces within the indicative red line development boundaries.	• Policy **T28 (Existing open space, outdoor sports and play spaces)** and **Policy DM21 (New open space, outdoor sports and play spaces)** encourage adequate open space and greenspace provision, including the replacement of any losses of open space or greenspace. • Policy **T27** aims to increase accessibility to recreational opportunities, which includes access to greenspaces. • Policy **S5 (Securing strong green and blue infrastructure)** will help to conserve and enhance the multi-functional GI network and greenspaces in Medway. • Several site allocation policies include the retention and / or provision of open space and sports facilities.	**The MLP policies will be expected to ensure that development proposals do not result in a net loss of public greenspace across the borough, leading to a negligible overall effect. Further positive impacts on access to greenspace could be achieved in the longer term, through the provision of on-site or off-site GI provisions, dependent on more site-specific context and information.**

Identified effects on human health	Mitigating MLP policies	Summary of residual effect
Limited access to PRoW or cycle network The majority of allocated sites are located in areas with good coverage by the PRoW, pedestrian and/or cycle networks, providing many site end users with opportunities for active travel and recreation in the countryside. However, Site W7 is located outside the sustainable target distance of 600m to the PRoW or cycle network, therefore site end users could be more reliant upon less sustainable modes of public transport including private car use.	• Policy **T26** requires that a variety of local amenities are located within a 15-minute walk or cycleway to major development proposals. • Policy **T27** encourages improvements to walking, wheelchair and cycling routes. • Policy **DM20** sets out required cycle parking standards which will help to facilitate travel via bicycle. • Several site allocation policies include provision of new/enhanced cycle and pedestrian routes, including the Gillingham Greenway within Site Policy **SA4 (River Waterfront)**.	The majority of allocated sites are located adjacent to existing pedestrian routes and/or cycle paths. Various MLP policies seek to create permeable neighbourhoods and promote cycling and walking which would be likely to improve the coverage of, and accessibility to, the pedestrian and cycle networks across Medway. **An overall positive effect would be likely with regard to pedestrian and cycle access.**

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12 Landscape

12.1 Baseline

12.1.1 Landscape can be described as comprising natural, cultural, social, aesthetic and perceptual elements, this includes flora, fauna, soils, land use, settlement, sight, smells and sound[110]. The link between landscapes and a range of other aspects can be provided with a close focus on GI provision, with multi-functional benefits. In this respect, policies advocate the provision of open space, green networks and woodland as opportunities for sport and recreation, creating healthier communities as well as supporting and enhancing biodiversity. National Design Guidance[111] advocates well-designed places that are functional, attractive and provide a sense of safety, inclusion and community cohesion.

Landscape Character

12.1.2 Landscape Character Assessments help to identify key characteristics that together can create sense of place and the unique character of an area. The Medway Landscape Character Assessment (2024)[112] identified eight landscape character types (LCTs), based on common geology, topography, land use and cultural pattern, which have been sub-divided into 34 landscape character areas (LCAs) with recognisable local identity. For each LCA, key characteristics, sensitivities and values as well as guidance and recommendations for development management have been identified; these aspects have been used to inform the SA.

Landscape Sensitivity

12.1.3 The Draft Hoo Landscape Sensitivity and Capacity Study (February 2019)[113] has been produced to help inform the decision making regarding the potential development of an extension to Hoo St Werburgh. The study has identified ten land parcels within the Hoo Peninsula, and each parcel has been assessed for its sensitivity, value and capacity. According to the study:

- **Landscape sensitivity** depends on the type, nature and magnitude of the proposed change as well as on the landscape's characteristics. High sensitivity indicates a landscape vulnerable to change and therefore less able to accommodate change without significant adverse effects. Low sensitivity indicates a landscape sufficiently robust to accommodate change without significant adverse effects.
- **Landscape capacity** is the extent to which a particular landscape type is able to accept a specific kind of change (e.g. housing) without significant effects on its character. Those parcels with a low capacity outcome are considered most

[110] Natural England (2014) An Approach to Landscape Character Assessment. Available at: www.gov.uk/government/publications/landscape-character-assessments-identify-and-describe-landscape-types [Date accessed: 29/04/25]

[111] MHCLG (2021) National Design Guide: Planning practice guidance for beautiful, enduring and successful places. Available at: www.gov.uk/government/publications/national-design-guide [Date accessed: 29/04/25]

[112] LUC (2024) Medway Landscape Character Assessment. Available at: https://medway.oc2.uk/docfiles/20/Landscape%20Character%20Assessment.pdf [Date accessed: 28/01/25]

[113] Hoo Landscape Capacity and Sensitivity Study (2019). Available at: www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 07/01/25]

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able to absorb development; those with a high capacity outcome are considered least able to absorb development.

Kent Downs National Landscape

12.1.4 The south western and south eastern part of the MLP area coincide with the Kent Downs National Landscape (NL; formerly known as Area of Outstanding Natural Beauty), north of the M2 (see **Figure 12.1**). Any development proposed in the MLP that lies within the NL boundary or its setting could lead to adverse impacts on the special qualities of the NL.

12.1.5 The Kent Downs Management Plan 2021-2026[114] sets out the future vision of the landscape and provides the strategies to be implemented that will ensure the special character of the landscape is recognised, valued and enhanced by the community for present and future use. The Kent Downs Landscape Character Assessment Update (2020)[115] provides a description of the character and sensitivities of land within the NL and recommendations to help guide planning and development in each area.

12.1.6 New development could potentially increase noise and light pollution and reduce the perception of tranquillity in some areas of the National Landscape as well as the wider plan area.

Country Parks

12.1.7 Country parks (CP) in Medway include 'Ranscombe Farm' (within the NL), 'Capstone Farm' (within the setting of the NL) and 'Riverside'. 'Shorne' Country Park to the east of Gravesham also draws visitors from Medway. CPs are designated under the Countryside Act 1968[116], which allows local authorities to establish and manage CPs to provide opportunities for informal recreation in the countryside. While not as strictly protected as national parks or nature reserves, country parks often have management plans to regulate their use, preserve the landscape, and ensure public access. Medway's CPs, especially Ranscombe Farm and Capstone Farm, have a geographic relationship with the Kent Downs NL and serve as important green buffers, helping to maintain ecological corridors.

Green Belt

12.1.8 A small section of the local plan area lies within the London Green Belt. Although Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and has the potential to indirectly influence landscape character by virtue of low quantities of buildings and higher quantities of semi-natural features including woods, arable fields and grasslands.

12.1.9 The Green Belt is intended to[117]:

- check the unrestricted sprawl of larger built-up areas;
- prevent neighbouring towns from merging into one another;

[114] Kent Downs (2021) Kent Downs National Landscape Management Plan 2021-2026. Available at: https://kentdowns.org.uk/wp-content/uploads/2021/11/The-Kent-Downs-AONB-Management-Plan-2021-2026-Adopted.pdf [Date accessed: 07/01/25]

[115] Fiona Fyfe Associates (2020) Kent Downs AONB Landscape Character Assessment Update 2020. Available at: https://kentdowns.org.uk/landscape-character-assessment-2020/ [Date accessed: 27/05/25]

[116] Countryside Act 1968. Available at: https://www.legislation.gov.uk/ukpga/1968/41 [Date accessed: 30/04/25]

[117] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 29/04/25]

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- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

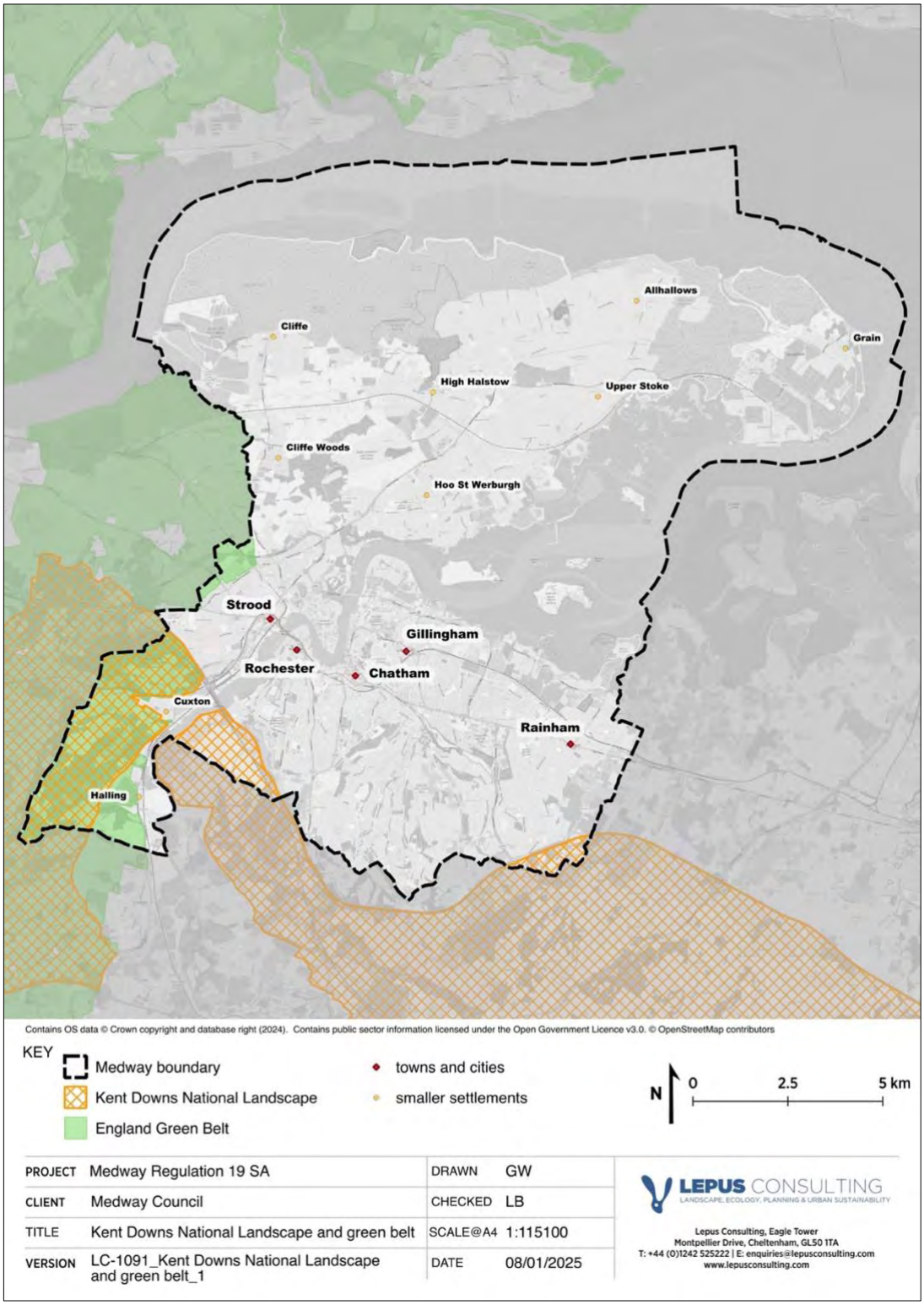

Figure 12.1: *Kent Downs National Landscape and areas of green belt within Medway*

***Box 12.1:** Summary of key issues for landscape in Medway*

Key issues for landscape include:

⇒ Development has the potential to impact on the Kent Downs National Landscape.

⇒ There is limited land available for development which places increasing pressure on natural assets due to the projected population increase.

⇒ Development should maintain important aspects of Medway's varied landscapes, including historic parks and gardens and areas of high landscape value.

⇒ Development should have regard to the findings of the published Landscape Character Assessment.

⇒ Change to and impacts upon the views from sensitive landscapes, local residents and the PRoW network.

⇒ Alterations to the urban/rural fringe and increased risk of coalescence between settlements.

⇒ Increasing demand for housing results in increased pressure on landscapes to accommodate new growth.

12.2 Evaluating the effect of the MLP on landscape

12.2.1 **Table 12.1** presents a plan-wide summary of the identified effects of the MLP on landscape that have been identified through the SA process, considers how the MLP policies will help to reduce or mitigate these effects, and explores the nature of residual effects.

***Table 12.1:** Summary of identified effects of the MLP on landscape*

Identified effects on landscape	Mitigating MLP policies	Summary of residual effect
Threats or pressures to the Kent Downs National Landscape Some 18 allocated sites are located within close proximity to the Kent Downs National Landscape, where development could result in adverse impacts on views or the setting of the designated landscape. Although Country Parks (CP) are not nationally designated landscapes in themselves, Sites LW6 and LW8 are located adjacent to Capstone Farm CP and a further nine sites lie close to a CP. The proposed development at these 11 sites could result in adverse effects on views and the setting of the nearby CPs, which may also have implications for the setting of the National Landscape in some locations.	• Policy **S6 (Kent Downs National Landscape)** seeks to ensure developments within or in the setting of the National Landscape contribute to conserving and enhancing its character. This includes Ranscombe Farm Country Park (within the National Landscape) and may also apply to Capstone Farm Country Park, due to its close proximity. • Policy **S4 (Landscape protection and enhancement)** requires development proposals to demonstrate how they respond to key sensitivities and qualities of the surrounding landscape, including the Kent Downs National Landscape. • Policy **T1 (High Quality Design and Amenity)** will be expected to ensure development is appropriate to its surroundings and informed by Landscape and Visual Impact Assessment.	Various MLP policies seek to protect nationally designated landscapes, specifically Policy S6. A range of plans, programmes and legislation including the NPPF, affords protection to nationally designated landscapes in line with their significance. **The MLP will be expected to help avoid or mitigate the potential for significant impacts on the Kent Downs NL arising from proposed development. Although, some uncertainty remains in regard to the impact of allocations in the Capstone Valley on the setting of the NL in absence of specific landscape sensitivity / capacity assessments covering this area.**
Alteration of landscape character and sensitive / locally distinctive landscapes	• Policy **S4** requires development proposals to conserve and enhance Medway's local landscape character and	Due to the scale of development proposed, with a large proportion in previously

Identified effects on landscape	Mitigating MLP policies	Summary of residual effect
A total of 34 site allocations are anticipated to have adverse effects on the distinctive characteristics of the landscape as identified in the published Landscape Character Assessment. This includes a number of sites within the 'Hoo Peninsula', 'Chattenden Ridge', 'Lower Rainham' and 'Cliffe Woods' character areas. According to data from the Hoo Landscape Sensitivity and Capacity study[118], four allocated sites are located within areas of 'high' sensitivity and 'medium-high' / 'high' capacity, and nine sites are within areas of 'medium' sensitivity and 'medium' capacity. The landscape character in these areas is susceptible to change as a result of the proposed development.	distinctiveness, such as the North Kent Marshes. Development proposals are encouraged to be located in areas of lower landscape sensitivity and consider visual attributes of the landscape. • Policy **S5 (Securing strong green and blue infrastructure)** encourages development proposals to reflect local character through providing multi-functional GI. • Policy **S7 (Green Belt)** aims to maintain a strong Green Belt within Medway and would ensure that new development is only permitted within the Green Belt in exceptional circumstances. • Various site allocation policies seek to ensure development respects, and seeks opportunities to enhance, landscape character.	undeveloped locations, these policies are not expected to fully mitigate the potential impacts on landscape character and a residual adverse effect is anticipated. **Alteration of the landscape character is a long-term and permanent significant effect. There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan.**
Changes in views experienced by local residents and users of the PRoW network The development proposed in the Plan has the potential to adversely affect informal high-quality viewing experiences that can be gained from the local PRoW network (including the North Downs Way National Trail) around proposed development locations. A total of 51 allocated sites coincide with, lie adjacent or lie in close proximity to, PRoW where there is potential for views to be altered. Development proposed at 52 site allocations has the potential to adversely affect views from nearby existing properties, for example through introduction of built form into current areas of open space or low-lying land.	• Policy **S4** requires development proposals to conserve and enhance Medway's local landscape character and distinctiveness, which will expect to protect landscape settings and key views. • Policy **S5** encourages development proposals to reflect local character through providing multi-functional GI, maintaining the borough's GI network will protect a key aspect of Medway's distinctive character, setting and key views. • Policy **T1** encourages high quality place making that reflects key characteristics and sensitivities within Medway. • Site Policy **SA1 (Chatham Town Centre and Surrounds)** and **SA5 (Strood District Centre and Surrounds)** require views analysis to inform development.	Whilst the MLP policies provide some proportionate protection of visual amenity and views, it is likely a residual impact will remain overall due to the large proportion of development in the Plan proposed on previously undeveloped sites and the location of a number of allocated sites with regard to the PRoW and existing properties. There is anticipated to be a cumulative adverse residual impact in relation to alteration of views for a number of allocated sites. **Alteration of views is likely to be a long-term and permanent minor adverse effect.**
Increase urban sprawl and coalescence between settlements The proposed development at 21 allocated sites were identified as being likely to result in adverse	• Policy **S4** encourages development to retaining the intrinsic character and beauty of the countryside by containing urban sprawl and retaining the separation of settlements.	Various MLP seek to minimise impacts on the countryside and maintain separation between settlements through protection of the Green Belt

[118] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 14/04/25}

Identified effects on landscape	Mitigating MLP policies	Summary of residual effect
impacts associated with the urbanisation of the countryside, with new development extending settlement boundaries into the countryside. The proposed development at 16 allocated sites has the potential to reduce the separation between settlements and therefore increase the risk of coalescence and loss of identity of these settlements.	• Policy **S7** aims to manage the openness of the countryside through preserving separation between settlements and containing urban sprawl, as part of the wider Metropolitan Green Belt surrounding Greater London. • The **Spatial Development Strategy** stipulates the importance of retaining separation between urban Medway and the Hoo Peninsula through providing strategic green corridors between the urban and suburban areas. • Policy **T1** seeks to retain urban/rural distinctiveness through containing settlements to avoid coalescence. • Site Policy **SA8 (Hoo St Werburgh and Chattenden)** requires a strategic landscape corridor to maintain separation of Hoo and Chattenden. • Site Policy **SA9 (High Halstow)** will avoid coalescence with nearby settlements through use of landscape buffers.	and open countryside. However, due to the rural context within which some of the new development is situated, the Local Plan policies will not be expected to fully mitigate these impacts and a residual adverse effect is anticipated. **An increased risk of urbanisation of the countryside and coalescence is a long-term and permanent significant effect.**

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13 Population and material assets

13.1 Baseline

13.1.1 'Population' is a broad topic and has been addressed under several SA Objectives: SA Objectives: 7 'housing', 8 'health and wellbeing', 10 'transport and accessibility', 11 'education' and 12 'economy and employment'. These objectives seek to create places where residents live a high quality of life for longer, are well educated and have the necessary skills to gain employment. Indicators include the proximity of development proposals to schools, accessibility to employment land and proximity to services and amenities.

13.1.2 'Material assets' covers a variety of built and natural assets which are accounted for in a range of SA Objectives. It is a requirement of Schedule 2 of the SEA Regulations to consider material assets, although they are not defined. The SA process has considered material assets as the health centres, schools and other essential infrastructure resources required to meet the demands of the local population and development aspirations of the Local Plan. This includes consideration of mineral resources and waste management. Other aspects of natural assets, such as agricultural land, have been considered under other SEA topics (see **Chapter 14 – Soil**).

Population size and age structure

13.1.3 In Medway, the population was estimated at 286,800 in mid-2023, presenting a 1.5% increase from the previous year[119]. This rise in population is greater than the percentage increase for the south east region, and is expected to continue to rise over the course of the Plan period.

13.1.4 Medway had an average (median) age of 38 between 2011-2021 which is lower than the average age of England (40) and in the south east (41). In the same time period, the number of people in Medway aged between 50-64 rose to 19.6% while the number of residents between 16-19 fell to 3.9%[120].

Transport and accessibility

13.1.5 Medway is set within both an urban and rural setting, influencing transport use and the issues surrounding transport infrastructure in the district. The growing demand for travel within the plan area and the wider region has placed a strain on the local transport network.

13.1.6 Medway's transport network provides links within the district and to surrounding neighbourhoods such as Maidstone, Sittingbourne and London. The major road network, comprising the A2, A228, A278, A289 and A229 spans the Medway area.

[119] Kent Analytics (2024). 2023 Mid-year population estimates: Total population in Kent. Available at: www.kent.gov.uk/__data/assets/pdf_file/0018/14724/Mid-year-population-estimates-total-population-of-Kent-bulletin.pdf [Date accessed: 03/01/25]

[120] Office of National Statistics. Census 2021. Available at: www.ons.gov.uk/visualisations/censusareachanges/E06000035/ [Date accessed: 07/01/25]

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13.1.7 Whilst Medway benefits from good motorway and rail accessibility, these methods of transport are frequently beset by congestion and the highways network is poorly designed as a result of its geography and the historical pattern of development, leading to issues related to capacity and safety in some areas.

13.1.8 Data on public transport nodes has been provided by Medway Council in the form of a mapped isochrone (see **Figure 13.1**). The mapping presents areas which are well served by public transport options, including the railway network and bus services.

Indices of Multiple Deprivation

13.1.9 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England[121]. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households. In general, deprivation is spread across England, with approximately 61% of local authorities containing at least one of the most deprived neighbourhoods in England.

13.1.10 The IMD was last updated in 2019[122]. Medway has 163 LSOAs, with four of these being ranked among the 10% most deprived in England.

Housing

13.1.11 Government guidance requires LPAs to determine the local housing need figure for their area. The local plan preparation process should then test the deliverability of this housing need figure (see **Chapter 5**). At the time of writing, it is understood that there is a need for 24,540 dwellings in Medway for the 15-year Plan period, according to the latest Standard Method calculation (1,636 dwellings per annum)[123]. Local plans should provide a mix of housing types and tenures in order to meet the identified needs for the population, including affordable housing, and accessible housing options particularly for people aged 65 and over.

Economy and employment

13.1.12 The improvement and maintenance of high and stable levels of economic growth and employment are key aims of UK and European strategies. Other objectives include improvements to the education system to increase the skill levels of both children and adults, as well as improved productivity and innovation.

13.1.13 Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers. A total of 154,500 (82.4%) people in Medway are economically active as of July 2023 – June 2024[124]. Although employment levels are high within Medway, unemployment levels are higher than the average across Kent.

[121] Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/IoD2019_Statistical_Release.pdf [Date accessed: 08/01/25]

[122] Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: www.gov.uk/government/statistics/english-indices-of-deprivation-2019 [Date accessed: 08/01/25]

[123] Medway Council (2025) Medway Local Plan 2041: Land Availability Assessment, June 2025.

[124] ONS (2024). Labour Market Profile. Medway. Available at: www.nomisweb.co.uk/reports/lmp/la/1946157282/report.aspx#tabempunemp [Date accessed: 08/01/25]

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13.1.14 Out-commuting presents a threat to the economy of Medway with residents travelling to work in Maidstone, Swale, and Tonbridge and Malling. Out-commuting could result in less local economic activity and weaker job markets in Medway.

Employment land

13.1.15 Medway's rich industrial heritage has positioned it as a highly appealing location for commercial ventures, especially those in engineering and manufacturing. Additionally, it has become a hub for construction companies and roles that support both the financial and public sectors.

Education

13.1.16 Medway is home to 76 state-funded, non-selective primary schools and 14 state-funded, non-selective secondary schools, spread across the area. There are also five educational institutions in Medway, including four shared universities at the Medway Campus, as well as MidKent College.

Waste

13.1.17 In Medway and nationally, there is a need to increase the proportion of waste sent for reuse, recycling or compost and move away from the use of landfill for waste disposal. Government initiatives including the 25 Year Environment Plan[125] and Waste Strategy for England[126] highlight the importance of moving towards sustainable waste management and cutting down on hazardous waste and single-use plastics which lead to adverse implications for the health of people and the environment.

13.1.18 The proposed development within the MLP area and associated increase in residents will be expected to result in a significant increase in waste produced. It is assumed that new residents in the MLP area will have an annual waste production of approximately 377kg per person, in line with the national average[127].

Minerals

13.1.19 Medway Council is a Mineral Planning Authority and therefore is responsible for producing policies for management and to ensure steady and adequate supply of the minerals to meet local or regional needs[128]. The geology in Medway includes deposits of chalk, clay and sand and gravel, much of which is located on the Hoo Peninsula.

13.1.20 Mineral Safeguarding Areas (MSAs) are located sporadically throughout Medway. These are predominantly sand and gravel resources situated along the River Medway and within rural areas in the north of the Hoo Peninsula.

[125] Defra (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 08/01/25]

[126] Defra (2018) Our Waste, Our Resources: A Strategy for England. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf [Date accessed: 29/04/25]

[127] DEFRA (2025) Statistics on waste managed by local authorities in England in 2023/24. Available at: https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results [Date accessed: 29/04/25]

[128] Medway Local Plan development. Section 12- Minerals, Waste and Energy. Available at: www.medway.gov.uk/downloads/file/2056/12_minerals_waste_and_energy [Date accessed: 08/01/25]

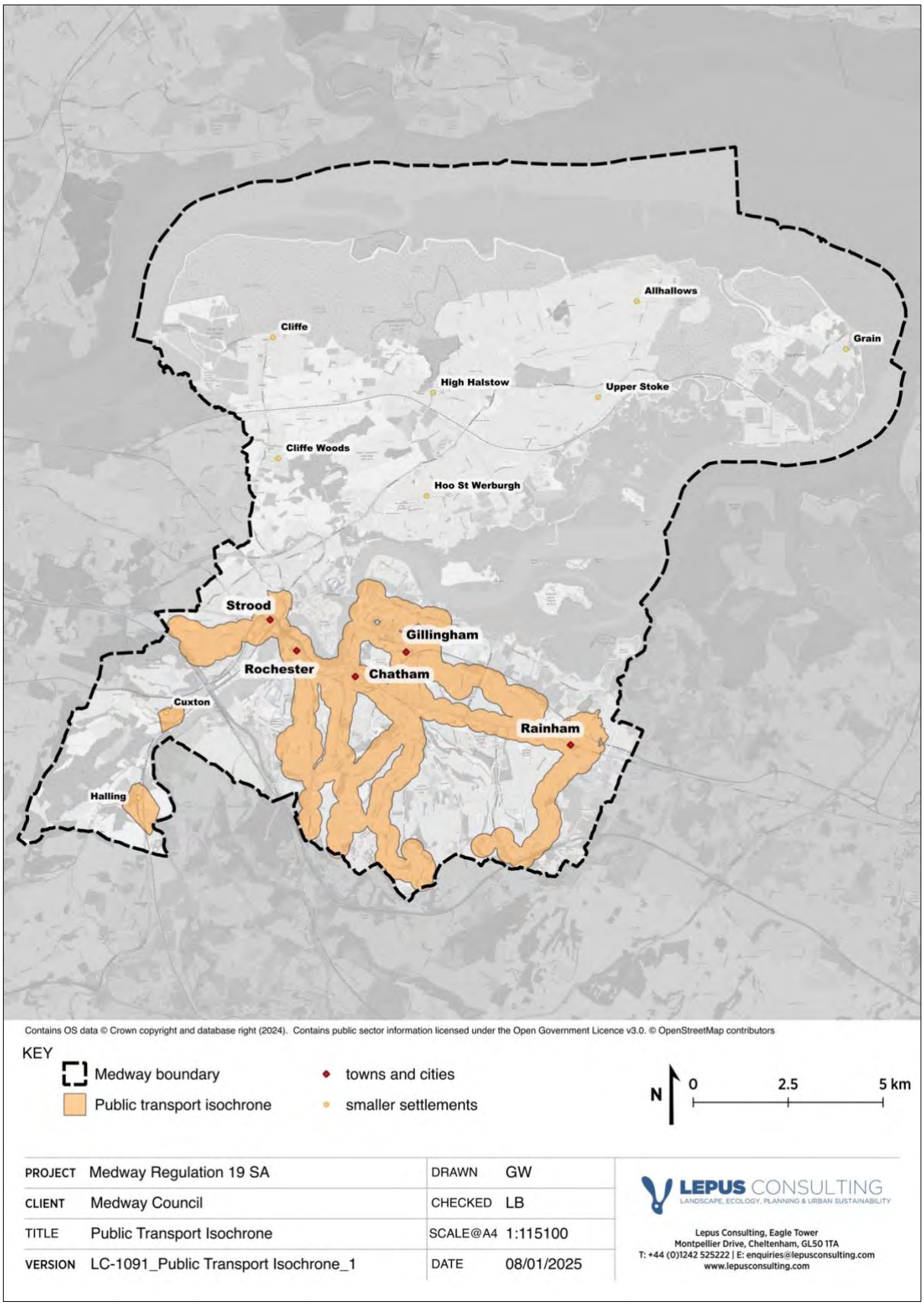

Figure 13.1: *High frequency public transport routes within Medway*

***Box 13.1:** Summary of key issues for population and material assets in Medway*

Key issues for population and material assets include:

⇒ The increasing population within the Plan area will inevitably create more waste and pollution

⇒ It is important to ensure waste management accords with the waste hierarchy and reduces the overall quantity of waste

⇒ Waste facilities will need to be provided to cater for a growing population, prevent fly tipping and increase recycling rates

⇒ Need to provide suitable housing for a growing elderly population

⇒ Many pockets of economic/income deprivation, with some suffering severe, multiple deprivation

⇒ Public transport and sustainable travel options are less widespread in more rural areas of the Plan area. The distance and accessibility to key services and amenities, as well as employment opportunities, should be considered when determining where to locate new development.

⇒ Travel time and sustainable accessibility to educational facilities including primary schools, secondary schools and further/higher level educational facilities varies across the Plan area.

13.2 Evaluating the effect of the MLP on population and material assets

13.2.1 **Table 13.1** presents a plan-wide summary of the identified effects of the MLP on population and material assets that have been identified through the SA process, considers how the MLP policies will help to reduce or mitigate these effects, and explores the nature of residual effects.

***Table 13.1:** Summary of identified effects of the MLP on population and material assets*

Identified effects on population and material assets	Mitigating MLP policies	Summary of residual effect
Provision of new homes The MLP proposes the development of 21,194 new homes, which in combination with consented sites and windfall sites, will meet the locally identified housing need of 24,540 homes according to the latest Standard Method calculation.	• Policy **T2 (Housing mix)** aims to ensure that residential developments meet the identified local housing needs, supporting the current and future requirements of the population in terms of housing type and size, as well as providing specialist accommodations for those with particular needs. • Policy **T3 (Affordable housing)** sets out the requirements to deliver affordable housing in urban and rural communities, to ensure that suitable residential development is provided to meet the social and economic needs of the population. • The 14 site allocation policies detail the specific sites to be delivered across Medway over the Plan period.	In order to meet the identified housing need, the Local Plan proposes to deliver 21,194 new dwellings. Policies in the Plan set out the requirements to provide an appropriate mix of housing types and tenures, seeking to meet the needs of different groups, including older people. **A positive effect on housing provision is anticipated.**
Provision of employment opportunities The MLP proposes the development of sufficient employment land to meet the	• Policy **S10 (Economic strategy)** will *"seek to boost Medway's economic performance, securing a range of jobs for its workforce,"* which includes improving the range of employment sites within Medway, which is likely to	The plan provides sufficient land for a portfolio of employment sites that meet the needs of different types of businesses. The strategy recognises the potential to

Identified effects on population and material assets	Mitigating MLP policies	Summary of residual effect
locally identified need of 204,000 sqm of industrial floorspace and 36,500 sq m of office floorspace according to the ELNA.	compensate for any loss of employment floorspace. • Policy **S15 (Town centres strategy)** supports extended retail provision and the development of in-centre and edge of centre locations for employment provision outside of designated employment areas. • Policy **S11 (Existing employment provision)** aims to safeguard existing employment sites from loss and redevelopment. • Site Policy **SA14 (Employment Sites)** allocates sets out a range of employment land uses and floorspace to be delivered within the Plan period including 324,450m^2 at MedwayOne (former Kingsnorth Power Station).	realise the strategic economic role of sites such as Grain and Kingsnorth in growing sectors. **A positive effect on employment provision is anticipated.**
Sustainable access to, and pressure on, local services and facilities Some site allocations are situated outside of sustainable distances to public transport infrastructure, including 23 sites over 400m from bus stops providing regular services, and 41 beyond 1.2km from railway stations. Of the 121 sites allocated for residential or mixed-use development, 31 sites lie outside the 800m sustainable distance for access to a primary school and 35 sites lie outside the 1.2km sustainable distance to a secondary school. Some 37 allocated sites are located over 800m sustainable target distance to a local store to meet day-to-day food needs. Sustainable access to healthcare services is considered under **Chapter 11: Human Health**.	• Policy **DM18 (Transport assessments, transport statements and travel plans)** requires all development proposals that will generate a significant amount of movement will be supported by a Transport Assessment or Statement, or commitment to provide one. • Policy **T26 (Accessibility standards)** requires all proposals to be accessible to a secondary school or social space via a 15-minute bus journey. • Policies including **DM15, T4, T5, T10, T27, S16** and **S17** all encourage development to be situated in areas accessible to public transport whilst encouraging co-location of services. This includes improving provision for bus links. • Policy **DM17 (Grain Branch)** aims to safeguard land for potential a new railway station and will not permit development that may compromise new rail infrastructure in this area. • A number of site allocation policies include provision of bus routes, shops and safeguarded land for a potential new railway station at Site HHH22/HHH31.	The MLP policies are expected to improve access to local services and facilities for the majority of sites through providing improved transport networks, developer contributions to services and new service provision. However, access could remain limited within a number of rurally located sites although the implementation of Travel Plans will potentially ensure this is addressed. **On balance, a residual negligible impact is identified for access to local services.**
Waste generation	• Policies **T34 (Safeguarding of existing waste management facilities)** and **T35 (Provision of**	The Waste Needs Assessment (WNA)[129] found sufficient

[129] BPP Consulting (2024) Medway Local Plan – Waste Evidence Base. Medway Waste Needs Assessment Update. Available at: https://medway.oc2.uk/document/20 [Date accessed: 13/06/25]

Identified effects on population and material assets	Mitigating MLP policies	Summary of residual effect
Medway Council has responsibility for the collection and management of waste. The proposed development of 21,194 homes and a significant amount of new employment floorspace will be expected to increase waste generation and have a potential adverse effect on the capacity of waste management facilities in the Plan area.	**additional waste management capacity)** safeguard current waste infrastructure and increase its capacity for waste management. • Policy **DM23 (Waste prevention)** encourages design principles that minimise waste and locally produced and recycled resources. • Policy **T37 (Other recovery)** supports the provision of energy from waste facilities where waste cannot be reused or recycled.	existing consented capacity to meet requirements for recycling, composting and inert waste over the Plan period, but a shortfall in non-inert waste to landfill. The construction and occupation of new homes and businesses could cumulatively increase non-inert waste production and potentially impact the capacity of existing waste facilities. **The cumulative impact of increased waste generation on the capacity of waste management facilities could potentially be a medium-term, but potentially temporary, significant effect.**
Sterilisation of mineral resources Medway Council is responsibile for planning for the supply of minerals in Medway. Where non-minerals development coincides with an identified MSA, there is potential for sterilisation of the mineral resource, meaning the minerals will be inaccessible for potential extraction in the future. Six allocated sites (Sites AS10, AS11, CCB35, SMI6, SNF31 and SR53) coincide with an MSA and could lead to adverse effects in this regard.	• The accompanying masterplan for Site SMI6 indicates that the MSA located within the site is to be retained for open space (see **Appendix F**). • Policy **T30 (Safeguarding mineral resources)** will ensure development is permitted only where it would not intervene with current or potential extraction of valuable mineral resources. • Policy **T31 (Safeguarding of existing mineral supply infrastructure)** safeguards existing mineral supply infrastructure from development that may limit their operation.	The MLP policies, incuding T30 and T31, will be expected to ensure that potential impact on safeguarded minerals is avoided or minimised. **Overall, a minor positive effect on the conservation of mineral resources is likely.**

14 Soil

14.1 Baseline

14.1.1 The protection of soil is crucial for future sustainability, since it plays a vital role in food and timber production, in the maintenance of our biodiversity, as a reservoir for water and as a buffer and filter for pollutants. In recent decades agricultural intensification, deforestation and increased pollution from industrial sources has resulted in loss of soil function and structure in localised areas.

14.1.2 In accordance with paragraph 187 of the NPPF, it is important that planning policies recognise the potential for development to have an irreversible adverse (cumulative) impact on the finite stock of best and most versatile (BMV) agricultural land and natural capital. Avoiding the loss of BMV land is a priority as mitigation is rarely possible. The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as BMV land[130]. The grades are as follows:

- Grade 1 – excellent quality agricultural land
- Grade 2 – very good quality agricultural land
- Grade 3 – good to moderate quality agricultural land
    - Subgrade 3a – good quality agricultural land
    - Subgrade 3b – moderate quality agricultural land
- Grade 4 – poor quality agricultural land
- Grade 5 – very poor-quality agricultural land

14.1.3 The underlying soils of Medway give rise to a mix of classified agricultural land, the majority being of Grade 1, Grade 3, Grade 5 and Urban, followed by Grade 4 and small patches of Non-Agricultural (see **Figure 14.1**).

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[130] MAFF (1988) Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land. Available at: http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736 [Date accessed: 08/01/25]

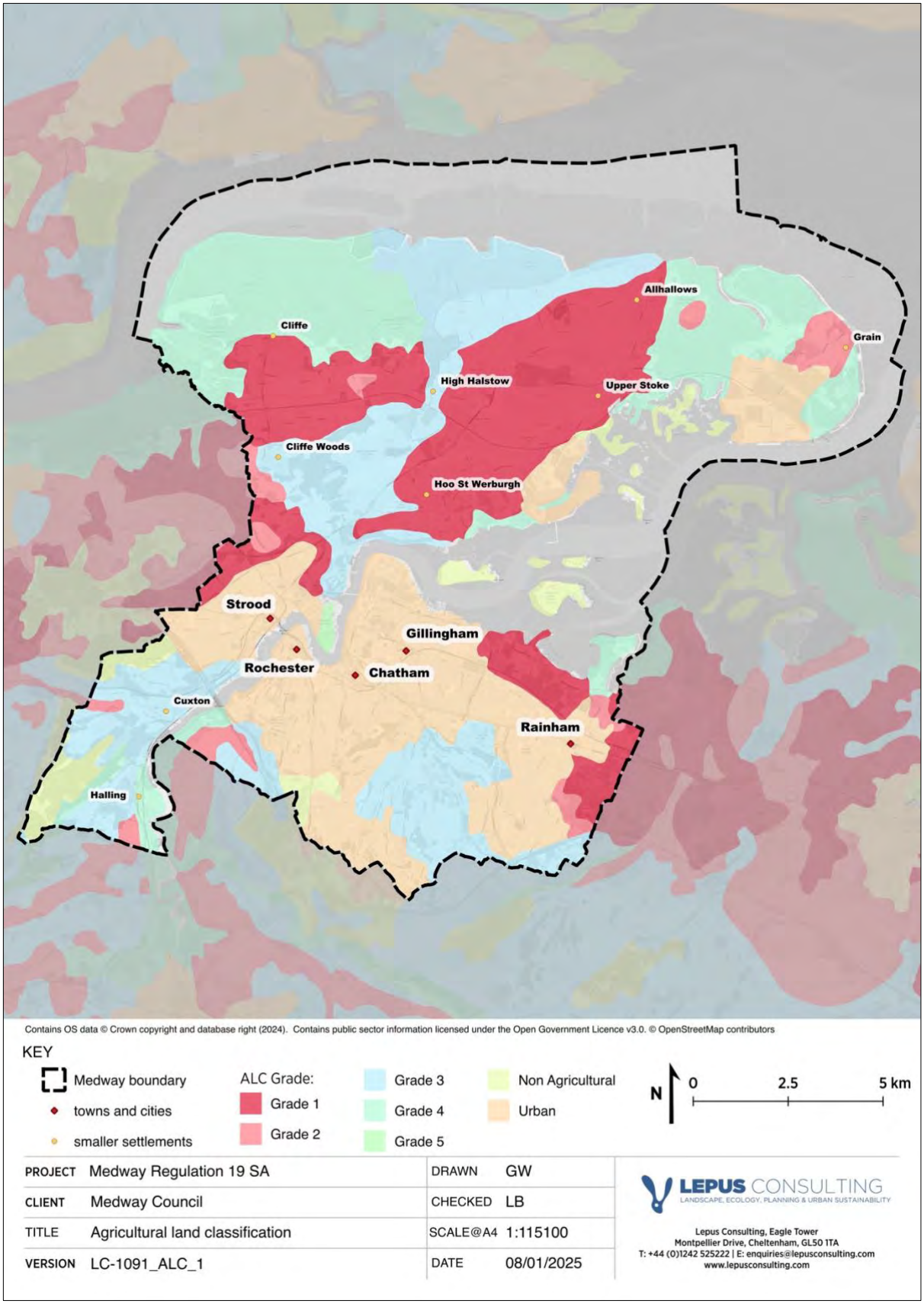

Figure 14.1: *Agricultural land classification within Medway*

Soil pollution and contaminated land

14.1.4 Soil pollution can refer to land which is contaminated by a range of pollutants including heavy metals, oils, chemicals and radioactive substances[131]. Land is legally defined as 'contaminated land' where substances have the potential to cause:

- significant harm to people, property or protected species;
- significant pollution of surface water (for example lakes and rivers) or groundwater; or
- harm to people as a result of radioactivity.

14.1.5 In accordance with the core planning principles of the NPPF[132], development on previously developed land will be recognised as an efficient use of land. Whereas, development proposals situated on previously undeveloped land are expected to pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.

14.1.6 The issue of soil was primarily taken into consideration under SA Objective 6 'Natural Resources' which aims to protect, enhance, and ensure efficient use of, the borough's land, soils and water. Soils have been considered to some extent under SA Objectives 2 'Climate Change Adaptation' and 3 'Biodiversity, Flora, Fauna and Geodiversity'.

Box 14.1: *Summary of key issues for soil in Medway*

Key issues for soil include:

⇒ The majority of land within the plan area is high quality agricultural land including ALC Grade 1 which may be under threat from new development.

⇒ The development of sites could cause soil erosion and soil loss.

14.2 Evaluating the effect of the MLP on soil

14.2.1 **Table 14.1** presents a plan-wide summary of the identified effects of the MLP on soil that have been identified through the SA process, considers how the MLP policies will help to reduce or mitigate these effects, and explores the nature of residual effects.

[131] Contaminated land. Available at: www.gov.uk/contaminated-land [Date accessed: 08/01/25]

[132] MHCLG (2024) National Planning Policy Framework, December 2024. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Date accessed: 29/04/25]

Table 14.1: *Summary of identified effects of the MLP on soil*

Identified effects on soil	Mitigating MLP policies	Summary of residual effect
Loss of soil resources The construction and occupation of new buildings on previously undeveloped land will be expected to result in a direct loss of soil resource, with little or no scope for mitigation. A total of 76 allocated sites are located wholly or partially on previously undeveloped land or land with potential environmental value. This includes 51 allocations which are situated upon land of ALC Grades 1, 2, or 3 which could potentially represent some of Medway's BMV agricultural land. Based on the indicative areas of these allocations, the MLP could result in the loss of up to c.1,110ha of previously undeveloped land, of which c.980ha is potential BMV land[133].	• The indicative masterplan for Site HHH36 confirms that through GI provision and open space, BMV soil will be retained (see **Appendix F**). • The **Spatial Development Strategy** encourages development proposals to make use of previously developed land, locating development away from greenfield land with high value soil. • Policy **S4 (Landscape protection and enhancement)** aims to provide local nature recovery networks and improve habitat connectivity, consequently areas of BMV soil. • Policy **S5 (Securing strong green and blue infrastructure)** will help to conserve and enhance the GI network in the borough, including BMV soil. • Policy **T14 (Rural economy)** supports employment development in the countryside that does not lead to significant loss of high-grade agricultural land and can demonstrate that locations of lower agricultural land value are not suitable.	The proposed allocations would cumulatively result in the loss of a significant amount of previously undeveloped land. The loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across the borough. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality and agricultural yield. Therefore, a residual adverse effect will be expected. **The loss of previously undeveloped land, a large proportion of which could include BMV land, is expected to be a long-term and permanent significant adverse effect.**

[133] Please note this figure is based on gross site areas and does not take into account net developable areas excluding new open space / green infrastructure provision or sites which are already partially developed.

Additionally, in absence of a detailed subgrade assessment distinguishing between Grade 3a and 3b, the total area of BMV land has been calculated on the assumption that all land classified as Grade 3 is Grade 3a. This approach may overestimate the actual extent of BMV land. A more accurate classification would require site-specific ALC survey data.

15 Water

15.1 Baseline

15.1.1 National water policies are primarily driven by the EU Water Framework Directive (WFD), as translated into national law by the Water Framework Regulations 2003. Key objectives include improving the quality of rivers and other waterbodies to 'good' ecological status by 2027; considering flood risk at all stages of the plan and development process in order to reduce future damage to property and loss of life; and incorporating water efficiency measures into new developments. Key PPPs for the MLP area include: Thames River Basin District River Basin Management Plan (2022)[134], Medway Estuary and Swale (MEAS) Flood and Coastal Erosion Risk Management Strategy[135] and the South East Water Resource Management Plan 2020-2080[136].

Water resources

15.1.2 Sewerage services and water supply across the majority of Medway are provided by Southern Water, with water supply in some parts of Medway (Halling) provided by South East Water. Drivers of increased water demand include an increase in population, a decrease in household occupancy and climate change. The draft Southern Water Resource Management Plan (2024)[137] aims to manage and meet future demand through encouraging water use efficiency, for example by innovative techniques like integration of artificial intelligence for installing water meters and reducing leakage.

15.1.3 Medway could be threatened by the climate change effects that may influence water supply, with increasing potential of water supply droughts. Medway will therefore be under the protection of the Southern Water Drought Plan (2019)[138] that has set out the strategy and activities that Southern Water will implement in managing impacts and mitigating the likelihood of a drought. Furthermore, pollution incidents have been reported, prompting Southern Water to develop a Drainage and Wastewater Management Plan (DWMP)[139] aimed at recommending necessary improvements.

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[134] Thames River Basin District River Basin Management Plan (2022) Available at: www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022 [Date accessed: 07/01/25]

[135] Environment Agency (2024) Medway Estuary and Swale flood and coastal risk management strategy. Available at: www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy [Date accessed: 29/04/25]

[136] South East Water (2024) Draft South Water Resource Management Plan (2024) 2020-2080. Available at: https://cdn.southeastwater.co.uk/Publications/Water+resources+management+plan+2019/south-east-water-final-wrmp-2020-2080.pdf [Date accessed: 07/01/25]

[137] Southern Water (2024) Southern Water Resource Management Plan 2024. Technical Report. Available at: https://cdn.southeastwater.co.uk/Publications/Water+resources+management+plan+2019/south-east-water-final-wrmp-2020-2080.pdf [Date accessed: 08/01/25]

[138] Southern Water Drought Plan (2019) Available at: www.southernwater.co.uk/about-us/our-plans/drought-plan/ Date accessed [08/01/25]

[139] Southern Water (2023). Drainage and Wastewater Management Plan. Level 1 Regional Drainage and Wastewater Management Plan. Available at: www.southernwater.co.uk/about-us/our-plans/drainage-and-wastewater-management-plans/ [Date accessed: 08/01/25]

Water quality

15.1.4 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water[140]. Watercourses that pass through Medway include the River Medway and smaller rivers and tributaries.

15.1.5 An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted[141]. However, development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. Each development proposal would need to be evaluated according to land use type, size of development and exact location to determine the potential impacts on water quality.

15.1.6 Water companies will need to ensure that wastewater treatment works (WwTW) have capability to withstand the additional capacity required through development proposed in the MLP and be expanded, if necessary, prior to development taking place.

15.1.7 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. The Environment Agency has produced a document which provides information on how they manage and protect groundwater[142]. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants.

15.1.8 There are three categories of SPZ[143] as follows:

- **Zone 1 – Inner Protection Zone:** the 50-day travel time from any point below the water table to the source, with a minimum radius of 50m
- **Zone 2 – Outer Protection Zone:** the 400-day travel time from a point below the water table to the source, with a minimum radius of 250-500m
- **Zone 3 – Source Catchment Protection Zone:** area around a source within which all groundwater recharge is discharged at the source

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[140] World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: www.who.int/publications/i/item/0419217304 [Date accessed: 08/01/25]

[141] Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value [Date accessed: 08/01/25]

[142] Environment Agency (2018) The Environment Agency's approach to groundwater protection, February 2018, Version 1.2. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Envirnment-Agency-approach-to-groundwater-protection.pdf [Date accessed: 08/01/25]

[143] Environment Agency (2019) Manual for the production of Groundwater Source Protection Zones – March 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/822402/Manual-for-the-production-of-Groundwater-Source-Protection-Zones.pdf [Date accessed: 08/01/25]

15.1.9 Designed to protect individual groundwater sources, these zones show the risk of contamination from any activities that might cause pollution in the area. In this context they are used to inform pollution prevention measures in areas which are at a higher risk, and to monitor the activities of potential polluting activities nearby. SPZs are present in the south of the MLP area, with predominately zones of SPZ3, with smaller areas of SPZ2 and SPZ1 (see **Figure 15.1**).

15.1.10 The issue of water quality has been primarily taken into consideration under SA Objective 5 'Pollution and Waste', which seeks to minimise the extent and impacts of water, air and noise pollution. Flooding has been considered in SA Objective 2 'Climate Change Adaptation', as discussed in **Chapter 9** – Climatic Factors.

15.1.11 The water environment and water resources have also been considered to some extent within SA Objective 6 'Natural Resources' which aims to protect, enhance, and ensure efficient use of, the borough's land, soils and water as well as SA Objective 3 'Biodiversity, Flora, Fauna and Geodiversity' in terms of ecological implications.

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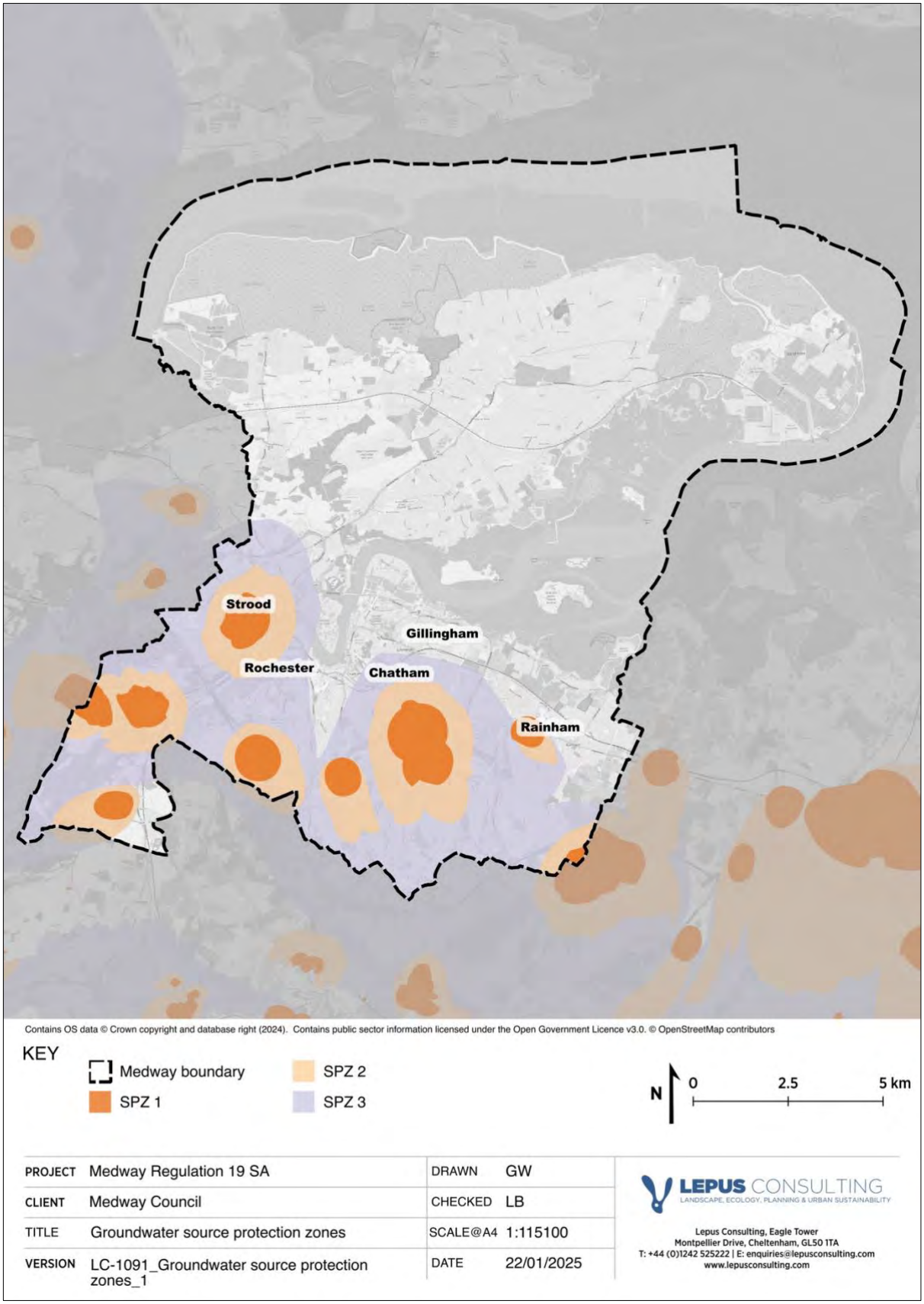

Figure 15.1: *Groundwater source protection zones*

***Box 15.1:** Summary of key issues for water in Medway*

Key issues for water include:

⇒ The Plan area contains SPZ1, SPZ2 and SPZ3 to the south of the plan area, supporting groundwater resources, the quality and quantity of which should be conserved.

⇒ There are a number of important water resources and marine habitats within and around Medway which are sensitive to pollutants.

⇒ The River Medway is a valued asset that is underused. However, development and/or use of the river must not compromise the marine life and ecosystems.

⇒ Medway lies within an area of water stress, where there is a risk of drought with implications for both human and ecosystem heath.

15.2 Evaluating the effect of the MLP on water

15.2.1 **Table 15.1** presents a plan-wide summary of the identified effects of the MLP on water that have been identified through the SA process, considers how the MLP policies will help to reduce or mitigate these effects, and explores the nature of residual effects.

***Table 15.1:** Summary of identified effects of the MLP on water*

Identified effects on water	Mitigating MLP policies	Summary of residual effect
Reduction in water quality The construction and occupation of new development has potential to increase the risk of contamination of waterways, primarily due to increased runoff, as well as the cumulative effect of sewage discharge outflows during storm conditions. Decreased water quality may compromise ecosystem service functions of the water environment with implications for wellbeing of humans as well as biodiversity. Additionally, 63 allocated sites are located within a groundwater SPZ, where new development is more likely to lead to groundwater contamination.	• Policy **DM1 (Flood and water management)** will ensure that all new development integrates the requirements of the Thames River Basin District Management Plan[144] including to improve water quality. Development within a groundwater SPZ will only be permitted providing it has no impact on the groundwater resource. • Additionally, Policy DM1 and **Policy S5 (Securing strong green and blue infrastructure)** encourage the preparation of Surface Water Drainage Strategies including the implementation of multi-functional SuDs to provide benefits for water quality.	It is likely that provisions set out in the MLP policies, and consultation with water companies, will partially mitigate impacts on water quality and ecosystem services. The implementation of SuDS will also help to treat diffuse pollution at the source to avoid adverse impacts on water quality. However, development is also likely to increase the quantity of raw sewage being disposed of in river channels, which will require additional monitoring in order to alleviate water quality issues. A residual adverse impact on water quality and ecosystem services is therefore identified, in line with the precautionary principle. **Deterioration in water quality and ecosystem services has the potential to be a long-term but potentially temporary significant effect.**

[144] Environment Agency (2022). Thames River Basin District Management Plan. Available at: www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022 [Date accessed: 26/03/25]

Identified effects on water	Mitigating MLP policies	Summary of residual effect
Increased demand for water and wastewater management The proposed development of 21,194 new homes and new employment floorspace through the MLP will increase the demand for water resources and place increased pressure on wastewater management infrastructure.	• Policy **DM1 (Flood and water management)** promotes efficient water usage and will ensure that adequate wastewater infrastructure is provided in tandem with new development. Development will be required to be in accordance with the Water Resource Management Plans published by South East Water and Southern Water to ensure public water supplies are maintained. • Policy **T40 (Wastewater treatment)** promotes effective wastewater disposal in line with regulatory provisions.	Measures within national policies and the MLP policies to improve water efficiency. Water supply issues will be addressed through the higher-level water planning framework and licencing process (RBMP, WRMP, Drought Plans and CAMS). Wastewater disposal will be addressed via Southern Water and their Drainage and Wastewater Management Plan. Effluent discharge to the water is also controlled through an environmental permitting system which is administered by the EA. Whilst it is likely that these measures will mitigate any adverse effects, at the time of writing, no data has been made available to confirm whether wastewater treatment works (WwTW) that serve Medway will have capacity for the projected growth, or whether sufficient water resources are available to support water supply for new development. **Uncertainty remains regarding the potential for increased pressure on water supply and wastewater management infrastructure.**

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16 Cumulative effects assessment

16.1 About this chapter

16.1.1 Cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of a local plan are assessed alongside known existing underlying trends and other plans and programmes.

16.1.2 Cumulative effects are different from effects that occur alone. Alone, the MLP may not result in significant adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.

16.1.3 **Table 16.1** summarises the residual effects identified for each of the SEA topics (as set out in **Chapters 7-15**) and presents the likely cumulative effects of the MLP when considering these alongside other plans and programmes as well as national trends.

Table 16.1: *Cumulative effects assessment of the MLP*

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Air • Increased generation of, and exposure to, air pollution	Nationally, measure to improve air quality are in place and continue to be prioritised by the UK government, which includes proposals to ban sales of petrol and diesel cars by 2035. Local, regional and national policy including the Medway Local Transport Plan[145] and the emerging Medway Air Quality Action Plan[146] will complement the MLP policies, seeking to tackle congestion and increase the coverage and connectivity of public transport and active travel networks which will help to reduce reliance on private car use. However, with the growth proposed in the MLP, some of which is within or in proximity to an AQMA, an increase in traffic flows and subsequent reduction of air quality will be expected to have residual adverse effects which cannot solely be fully mitigated through MLP policies. Overall, the MLP will be likely to result in a **long-term but potentially temporary significant cumulative adverse effect** on air quality, which could result in secondary effects such as for the health of residents and biodiversity.	-

[145] Medway Council (2023) Local Transport Plan 2011-2026. Available at:www.medway.gov.uk/downloads/file/1995/local_transport_plan_2011-2026 [Date accessed: 17/06/25]

[146] Medway Council (2024) Medway Air Quality Action Plan 2024 (draft). Available at: www.medway.gov.uk/downloads/file/7339/medway_air_quality_action_plan_2024_draft [Date accessed: 17/06/25]

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Biodiversity, flora and fauna • Threats or pressures to European sites • Threats or pressures to nationally designated biodiversity sites • Threats or pressures to locally designated and non-statutory biodiversity sites • Fragmentation of the ecological network	Biodiversity sites designated for their national, international or local biodiversity value will continue to benefit from legislative protection. The MLP policies are likely to enhance habitat connectivity and strengthen the resilience of ecological and GI networks against current and future pressures. They support the conservation and expansion of GI coverage, along with the creation of new habitats, providing opportunities to improve connections between biodiversity features and support nature recovery. However, **at the time of writing in absence of the HRA conclusions, uncertainty remains** with regard to the potential implications of the MLP allocations when considered in combination with growth across the wider Kent region on the European designated estuarine habitats and the species they support.	**+/-**
Climatic factors • Risk of fluvial and tidal flooding (present and future) • Surface water flood risk • Reduced viability of flood defences • Increased GHG emissions • Loss of multi-functional GI	The MLP policies set out provisions to reduce GHG emissions (including embodied carbon emissions), seek opportunities for renewable and low carbon technologies, enhance GI and reduce flood risk. However, the development proposed in the MLP is likely to contribute towards a cumulative increase in GHG emissions with increased energy demand associated with this new development as well as transport related emissions, and the production and use of materials during construction. Overall, the MLP could potentially result in a **cumulative adverse effect on climate change** which may lead to secondary effects such as flood risk, threats to the health and safety of residents, further declines in the diversity of habitats and wildlife, and water supply across the Plan area. The emerging Future Homes Standard will seek to ensure that new homes are future-proofed with low-carbon heating systems, air-source heat pumps and high levels of energy efficiency. This new standard, coupled with local interventions and consideration of carbon offsetting schemes, has the potential to limit Medway's contributions to the climate crisis in the longer term.	**-**

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Cultural heritage • Alter the character and/or setting of designated heritage assets • Alter character and/or setting of Conservation Areas	Medway supports a range of designated and non-designated heritage features. The MLP policies in combination with adopted SPDs[147][148], legislation and wider heritage schemes such as the HAZ[149] will be expected to ensure **no significant impacts** on the designated heritage assets and Medway's historic character arise from the proposed development. The MLP policies will further encourage the conservation and enhancement of historic features which may lead **to longer term benefits** to Medway's historic character through encouraging heritage-led regeneration and redevelopment of previously developed land, including at Chatham and Gillingham waterfront locations	+
Human health • Sustainable access to healthcare / leisure facilities • Exposure to air / noise pollution (from AQMAs and main roads) • Limited access / net loss of public greenspace • Limited access to PRoW or cycle network	Most site allocations in the MLP are located in areas with good sustainable access to healthcare facilities and transport options, or areas where improvements to public transport / active travel links and healthcare provisions have been set out. Access to open space and the countryside for recreation is likely to be generally good, accounting for new and expanded facilities. However, the development allocated in the MLP will be expected to put pressure on existing healthcare and open space provision especially when considered in combination with neighbouring authority growth. Although the Infrastructure Delivery Plan (IDP) seeks to ensure adequate delivery of new infrastructure in line with planned growth in Medway, **uncertainty remains in terms of the delivery of new healthcare infrastructure to meet needs sustainably**, given the existing poor GP-to-patient ratio in Medway.	+/-

[147] Medway Council (2018) Development Brief: Interface Land, Chatham. Supplementary Planning Document, June 2018. Available at: https://www.medway.gov.uk/downloads/file/2989/chatham_interface_land_development_brief_june_2018 [Date accessed: 16/06/25]

[148] Medway Council (2024) Star Hill to Sun Pier Supplementary Planning Document 2024. Available at: https://www.medway.gov.uk/downloads/file/8610/star_hill_to_sun_pier [Date accessed: 03/06/25]

[149] Medway Council (2025) Heritage Action Zone. Available at: https://www.medway.gov.uk/info/200177/regeneration/1218/heritage_action_zone [Date accessed: 17/06/25]

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Landscape • Threats or pressures to the Kent Downs NL • Alteration of landscape character and sensitive / locally distinctive landscapes • Changes in views experienced by local residents and users of the PRoW network • Increase urban sprawl and coalescence between settlements	The Kent Downs National Landscape will continue to benefit from legislative protection. Various MLP policies promote sensitive and high-quality design that will respect and where possible enhance the local character, and seek to maintain separation between settlements with careful use of GI and green buffers. The MLP seeks to direct development towards previously developed land where possible, although to meet the identified housing requirements, a proportion of growth within the Plan is located on previously undeveloped land including in proximity to the Kent Downs NL (within the Capstone Valley) and on the current sparsely populated Hoo Peninsula. When considered alongside development pressures in neighbouring authorities, including trans-boundary sites with Gravesham and Maidstone Boroughs, the MLP is likely to lead to a **long-term and irreversible cumulative adverse effect on landscape character and tranquility** associated with the incremental loss of undeveloped land and open countryside.	-
Population • Provision of new homes • Provision of employment opportunities • Sustainable access to, and pressure on, local services and facilities	The MLP is likely to have a **positive effect on people and the economy** as a result of the provision of new homes and employment floorspace to meet the diverse range of needs in the Plan area. The MLP also seeks to ensure that housing of a range of types and tenures is available to residents, including affordable housing and housing for people with specific needs. The MLP policies will help to ensure sustainable access to services, supported by local and national policy that promotes the improvement and integration of public transport. The MLP will ensure protection of existing facilities and provision of new facilities to address accessibility gaps. Overall, **no significant impacts are expected in terms of accessibility**.	+
Material assets • Waste generation • Sterilisation of mineral resources	The MLP policies will be expected to ensure that potential impact on safeguarded minerals is avoided or minimised, leading to a positive effect on the conservation of mineral resources. Although the WNA[150] identified sufficient existing consented capacity for recycling, composting and inert waste projected over the Plan period, the construction and occupation of new homes and businesses could cumulatively increase non-inert waste production and potentially impact the capacity of existing waste facilities. When considered alongside growth in neighbouring areas, there is **potential for a cumulative, but potentially temporary, significant effect on the capacity of waste management facilities**.	-

[150] BPP Consulting (2024) Medway Local Plan – Waste Evidence Base. Medway Waste Needs Assessment Update. Available at: https://medway.oc2.uk/document/20 [Date accessed: 13/06/25]

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Soil • Loss of soil resources	Nationally, rates of soil erosion are increasing. Soil is a non-renewable resource, which performs several important ecosystem services and supports a diverse range of habitats. Despite seeking to make the best use of available brownfield and previously developed land the proposed allocations in the MLP will cumulatively result in the loss of up to c.1,110ha of previously undeveloped land, of which c.980ha is potential BMV land[151]. Whilst the MLP does seek to increase GI across the Plan area, and make use of BMV land in some locations via community allotments, the loss of permeable soils has potential to increase soil erosion, flood risk and reduce biodiversity. Loss of soil can compromise the ability of the soil biome to effectively provide ecosystem services. Overall, there is potential for a **permanent cumulative adverse effect on ecosystem services**.	--
Water • Reduction in water quality • Increased demand for water and wastewater management	Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the RBMP, WRMP and CAMS in line with the Water Framework Directive. The expected increase in population as a result of the development proposed in the MLP will increase pressure on both water supply and wastewater management infrastructure. Whilst it is likely that these measures will mitigate any adverse effects, at the time of writing, no data has been made available to confirm whether WwTW that serve Medway will have capacity for the projected growth, or whether sufficient water resources are available to support water supply for new development. Irrespective of this, when considered in combination with growth in neighbouring authorities, and with climate change leading to increased storm events, there is potential for adverse impacts on downstream water quality as a result of diffuse pollution and increased sewage overflows into waterbodies. **A long-term cumulative effect has been identified in terms of water quality.**	-

[151] Please note this figure is based on gross site areas and does not take into account net developable areas excluding new open space / green infrastructure provision or sites which are already partially developed.

Additionally, in absence of a detailed subgrade assessment distinguishing between Grade 3a and 3b, the total area of BMV land has been calculated on the assumption that all land classified as Grade 3 is Grade 3a. This approach may overestimate the actual extent of BMV land. A more accurate classification would require site-specific ALC survey data.

17 Monitoring

17.1 Context

17.1.1 Regulation 17 of the SEA Regulations states *"The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action".*

17.1.2 The purpose of monitoring is to measure the environmental effects of the Plan as well as its success against its objectives. However, monitoring can place a heavy burden on financial and human resources, and it may therefore be practical to focus on monitoring residual adverse effects and to build on existing monitoring systems.

17.1.3 Monitoring the impacts of the Local Plan should seek to answer:

- Was the likelihood of sustainability impacts identified in the SA process accurate?
- Is the Local Plan successful in achieving its desired sustainability objectives?
- Are mitigation measures performing as expected?
- Are there any unforeseen adverse impacts of the Local Plan, and if so, are these within acceptable limits or is remedial action required?

17.2 Monitoring proposals

17.2.1 Monitoring proposals are set out in **Table 17.1** for Medway Council to consider in the implementation of the MLP.

Table 17.1: *Proposals for monitoring adverse sustainability impacts of the MLP*

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO_2 and PM_{10}	Annually, Plan area wide	Decrease
Air	Road network performance	Bi-annually, Plan area wide	Decrease
Air	Number of vehicle trip credits (i.e. vehicle trip generation from new development)	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of planning approvals granted contrary to the advice of Natural England	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Quality and extent of priority habitats	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Uplift in biodiversity net gain units within Medway	Annually, Plan area wide	Increase

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Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Biodiversity, flora and fauna	Implementation of measures from the North Kent SAMMS	Various	Various
Climatic factors	CO_2 emissions per capita	Annually, Plan area wide	Decrease
Climatic factors	Percentage of energy generated from renewable sources	Annually, Plan area wide	Increase
Climatic factors	Number of properties at risk of flooding	Annually, Plan area wide	Decrease
Climatic factors	Extent of surface water flood risk	Annually, Plan area wide	Decrease
Climatic factors	Fluvial/tidal flood risk along the River Medway	Annually, Plan wide area	Decrease
Cultural heritage	Number of conservation area appraisals	Annually, Plan area wide	Increase
Cultural Heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP surgeries	Annually, Plan area wide	Increase
Human health	Hectares of accessible open space per 1,000 population	Annually, Plan area wide	Increase
Landscape	Quantity of development in sensitive landscapes	Annually, Plan area wide	Zero
Landscape	Quality and extent of green infrastructure	Annually, Plan area wide	Increase
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in Medway within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste sent to landfill	Annually, Plan area wide	Decrease
Population and material assets	Quantity of commercial and industrial waste recycled	Annually, Plan area wide	Increase
Population and material assets	Area of safeguarded mineral resources	Annually, Plan area wide	Maintain
Soil	Number of dwellings built on previously developed or brownfield land	Annually, Plan area wide	Increase
Soil	Area of contaminated land remediated	Annually, Plan area wide	Increase
Water	Number of planning permissions granted contrary to Environment Agency advice	Annually, Plan area wide	Zero
Water	Number of waterbodies classified as 'good' ecological status	Annually, Plan area wide	Increase
Water	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water	Water efficiency in new homes	Annually, Plan area wide	Increase
Water	Water availability for extraction	Annually, Plan area wide	Increase

18 How the SA has influenced the Plan

18.1 The role of the SA

18.1.1 The SA has been an influential tool throughout the plan making process to date. It works on an iterative basis. The plan makers identify various options at different stages of the plan making process which are subsequently appraised through the SA process using the methodology in **Chapter 4**.

18.1.2 The SA findings have been used to help refine policy choices and site options through to the final proposals set out in the MLP. The SA site assessments, i.e. pre- and post-mitigation scoring against 12 objectives, were reviewed in the Council's consideration of site 'suitability' in the Land Availability Assessment.

18.1.3 The process of appraisal is sequential in nature: an assessment of impacts is made, the mitigation hierarchy is applied, and the assessment of effects is revisited, leading to the identification of residual effects. The mitigation hierarchy is an important element of the assessment process. It considers firstly if the identified adverse effect can be avoided and if not, if it can be adequately mitigated to reduce the effect.

18.1.4 SA is necessarily a high-level assessment process, often using secondary data at a scale which is plan-based to make assessments about smaller-scale sites. This can introduce uncertainty to the process (see assumptions and limitations **Chapter 4** and **Appendix E**). The application of the precautionary principle means that when doubt prevails, a worst-case scenario is identified.

18.1.5 The likely evolution of the baseline without the Plan (see **Table 3.1**) shows that there are already a number of important trends, some of which are negative in nature. These include matters such as air quality, GHG emissions and flood risk; events associated with a changing climate and that are likely to continue without the MLP.

18.2 Recommendations

18.2.1 Recommendations made throughout the SA process have been fed back to the Council to assist their decision making as the MLP has been developed. This includes recommendations made in Table 9.1 of the Regulation 18 Interim SA Report[152] which are replicated below in **Table 18.1**. Further recommendations have been made during the preparation of this Regulation 19 SA Report, building on those at the Regulation 18 stage, which are summarised in **Table 18.2**.

18.2.2 It should be noted that the recommendations are not exhaustive, nor are they all necessary. The recommendations set out measures that may help to mitigate some of the potential adverse effects that had been identified during the SA process. Some recommendations provided with regard to the MLP policies prepared at Regulation 18 have since been acted upon by the Council, reflected in updated policy wording.

[152] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 29/04/25]

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18.2.3 Most notably, the outcomes of the SA in terms of reasonable alternative site options have been considered in the Council's site assessment processes, ensuring that the sustainability outcomes for individual sites have been considered prior to allocations being made.

Table 18.1: *Recommendations made in the Regulation 18 Interim SA and actions taken by Medway Council*

SA Objective	Recommendations made in the Interim SA Report	Medway Council response
1: Climate Change Mitigation	• Provide necessary infrastructure to encourage low carbon options and carbon neutral development where possible. • Consider retrofitting buildings to make them more energy efficient. • Different approaches to heat decarbonisation and the removal of gas boilers (as advocated under the Future Homes Standard[153]), should be promoted through the MLP including consideration of district heating network connections and / or heat pumps. Opportunities to promote Passivhaus buildings[154] should be considered. • As part of additional supporting evidence for the MLP, the Council could consider commissioning a climate change study and calculating / reporting on greenhouse gas emissions in greater detail. This could include use of the Greenhouse Gas Accounting Tool[155]. More detailed carbon footprint data for the Plan area would enable the SA process to evaluate changes to carbon emissions as a consequence of the Plan in terms of (a) evolution of the baseline without the plan, and (b) effect on climate change through increased or decreased emissions, with the Plan. • It is recommended that Whole Life-Cycle Carbon (WLC)[156] assessments are carried out to provide more accurate detail on the carbon emissions likely to be generated as a result of development, particularly for strategic development sites. • The recommendations of the RTPI Planning for Climate Change guidance[157] should be considered.	• Policies S1 (planning for climate change) and DM6 (sustainable design and construction) require developments to demonstrate how the climate emergency will be addressed and support whole life low carbon designs. • Policy T41 (heat networks) will ensure that the heat network provision hierarchy is followed.
2: Climate Change Adaptation	• Ensure development proposals explore every opportunity to incorporate GI enhancements, recognising the multi-functional benefits of GI including for wildlife, recreation, flood risk mitigation, urban cooling / shading and carbon storage. The role of GI in relation to flood risk is particularly important in	• Policy S5 (securing strong green and blue infrastructure) sets out the Council's approach to conserving and enhancing Medway's network of green and blue infrastructure, and supports the principles of

[153] MHCLG (2021) The Future Homes Standard. Available at: https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings [Date accessed: 11/06/25]

[154] Passivhaus Trust. Available at: https://www.passivhaustrust.org.uk/ [Date accessed: 11/06/25]

[155] Local Partnerships (2024) Greenhouse Gas Accounting Tool and Waste Emissions Calculator. Available at: https://localpartnerships.org.uk/greenhouse-gas-accounting-tool/ [Date accessed: 11/06/25]

[156] Greater London Authority (2024). Whole Life-Cycle Carbon Assessments guidance. Available at: https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance [Date accessed: 11/06/25]

[157] RTPI (2023) The Climate Crisis: A Guide for Local Authorities on Planning for Climate Change. Available at: https://tcpa.org.uk/wp-content/uploads/2021/11/TCPA-RTPI-Climate-Guide-4th-edition-1.pdf [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Interim SA Report	Medway Council response
	the Medway area given its coastal location and the prevalence of fluvial and tidal flood risk. • Prioritise the safeguarding of land alongside existing coastal flood defences to ensure the Plan is proactively planning for climate change and likely raising of defences in line with the Thames Estuary 2100 (TE2100) Plan[158]. • Ensure development proposals do not result in the exacerbation of surface water flood risk in surrounding areas. Development proposals should be built in accordance with the recommendations of the latest Surface Water Management Plan[159].	Natural England's GI Framework. • Policy DM1 (flood and water management) makes specific reference to any required flood risk management infrastructure being in accordance with the Environment Agency's MEAS and TE2100 programmes. • Policy DM1 additionally requires all development identified as being in a Sensitive Drainage Area to provide a Surface Water Management Strategy and SuDS proforma.
3: Biodiversity and Geodiversity	• Medway Council could consider encouraging a higher BNG target than the statutory minimum of 10% as set out in Policy S2, for example on strategic development sites. Further, the Council could consider implementing an Environmental Net Gain policy which would require developers to deliver a wider range of environmental benefits than BNG alone, such as for air quality and flood risk management[160] [161], which would reflect the aims of the 25-year Environment Plan[162] and the Environmental Improvement Plan[163]. • Local green and blue infrastructure networks should be protected and enhanced, including retrofitting GI within urban areas. It is recommended that the Draft Medway Green and Blue Infrastructure Framework[164], is updated to ensure it reflects the latest national policy and guidance including Natural England's Green Infrastructure Framework[165].	• Policy S5 (securing strong green and blue infrastructure) seeks to ensure opportunities to retro-fit GI into existing urban areas are maximised. • Recommendations made in the HRA process have been taken into account particularly for Policies S2 and S3 at the Regulation 19 stage. • Various MLP policies make reference to aiding the delivery of the Kent and Medway Local Nature Recovery Strategy. • Policy S2 (conservation and enhancement of the natural

[158] DEFRA and Environment Agency (2023) Thames Estuary 2100. Available at: https://www.gov.uk/government/collections/thames-estuary-2100-te2100 [Date accessed: 11/06/25]

[159] AECOM (2016) Medway Surface Water Management Plan. Available at: https://www.medway.gov.uk/downloads/file/2870/medway_surface_water_management_plan_report [Date accessed: 11/06/25]

[160] DEFRA (2019) Natural Capital Committee advice to government on net environmental gain. Available at: https://www.gov.uk/government/publications/natural-capital-committee-advice-to-government-on-net-environmental-gain [Date accessed: 11/06/25]

[161] National Infrastructure Commission (2021) Natural Capital and Environmental Net Gain: A discussion paper. Available at: https://nic.org.uk/app/uploads/Updated-Natural-Capital-Paper-Web-Version-Feb-2021-1.pdf [Date accessed: 11/06/25]

[162] HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 11/06/25]

[163] DEFRA (2023) Environmental Improvement Plan 2023. Available at: https://www.gov.uk/government/publications/environmental-improvement-plan [Date accessed: 11/06/25]

[164] Medway Council (2021) Medway Green and Blue Infrastructure Framework. Consultation Draft 4 October 2021. Available at: https://www.medway.gov.uk/downloads/file/6279/medway_green_and_blue_infrastructure_framework [Date accessed: 11/06/25]

[165] Natural England (2025) Green Infrastructure Framework. Available at: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Interim SA Report	Medway Council response
	• The findings and recommendations of the emerging Habitats Regulations Assessment (HRA) of the MLP should be taken into account and incorporated into the policies. • Policies should support development which aims to conserve, and where possible provide, supporting habitat to nearby European sites and SSSIs (particularly the Medway Estuary and Marshes). • There is a need to protect and improve resilience and connectivity of biodiversity sites through landscape-scale management alongside planned growth. The MLP should ensure that measures to help the delivery of the emerging nature recovery network are incorporated into the Local Plan, in accordance with the emerging Kent and Medway Local Nature Recovery Strategy[166]. • The findings and recommendations of the emerging Cumulative Ecological Impact Assessment should be taken into account within the MLP, to ensure that development avoids harm to sensitive biodiversity assets including the Chattenden Woods and Lodge Hill SSSI. • It is recommended that site-specific policies are prepared for preferred development sites with potential to adversely affect a biodiversity asset to provide details on the proposed development and how any biodiversity asset would be retained and/or enhanced. • The MLP should seek to ensure that new development does not worsen, and seeks opportunities to improve, the ecological and chemical status of the River Medway.	environment) has been updated to make direct reference to Chattenden Woods and Lodge Hill SSSI as part of the proposed strategic environmental programme for designated sites on the Hoo Peninsula.
4: Landscape and Townscape	• The MLP should ensure development proposals are constructed in accordance with appropriate design guides and codes, including the 'Design: process and tools'[167] government guidance. Implementing locally specific guidance is recommended to support local distinctiveness and tailor the approach to reflect local priorities. • Ensure development proposals are in-keeping with the local landscape character and the findings and recommendations of the emerging Landscape Character Assessment (2024), or any subsequent evidence prepared. Linked to this, the Local Plan policies (such as Policy S4 and T1), when finalised, should ensure there is clear cross-referencing to specific evidence documents and policy guidance to provide clarity for developers and encourage higher quality and more sustainable developments. • The MLP policies should encourage active frontages within town centres and high streets. Improvements to GI coverage within urban areas should also be encouraged, such as through seeking opportunities to design GI into frontages or implement public realm	• Policy T1 (high quality design and amenity) and other MLP policies refer to the requirements of established and emerging design guidance and codes. • Policy T25 (user hierarchy and street design) promotes active frontages to help create characterful places. • Policy S5 (securing strong green and blue infrastructure) sets out the Council's approach to conserving and enhancing Medway's network of green and blue infrastructure. • MLP policies, including S4 (landscape protection and enhancement) and S6 (Kent Downs National Landscape)

[166] Making Space for Nature in Kent and Medway. Available at: https://www.makingspacefornaturekent.org.uk/ [Date accessed: 11/06/25]

[167] DLUHC & MHCLG (2019) Guidance. Design: process and tools. Available at: https://www.gov.uk/guidance/design [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Interim SA Report	Medway Council response
	landscaping schemes. This would provide opportunities to improve the quality, character, and appearance of built form, promoting a strong sense of place and encouraging visitors. • Where new development is located within or in proximity to the Kent Downs AONB (National Landscape), it is recommended that a full assessment of the potential impacts to the National Landscape and its setting are considered, in accordance with the NPPF. The Local Plan should aid the delivery of the vision for sustainable development as set out in the Kent Downs AONB Management Plan 2021-2026[168]. • Development proposals should embrace the principles of the 2020 'Building Better, Building Beautiful' report[169], promoting the three pillars advocated in the report: *"ask for beauty, refuse ugliness and promote stewardship"*.	recognise the diversity and importance of Medway's landscapes including the Kent Downs National Landscape and its setting.
5: Pollution and Waste	• Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring. • Development proposals should aim to protect areas identified as tranquil. An example method for identifying tranquillity include 'Mapping Tranquility'[170]. • The Council should seek to proactively collaborate with water companies to ensure that future growth in Medway can be accommodated and any potential adverse effects are mitigated in terms of wastewater infrastructure, water resources and water efficiency, in line with the latest Drainage and Wastewater Management Plans (DWMP). This could be brought out more strongly in Policy DM1, setting out measures to ensure the deterioration of water quality is prevented from any possible source with cross-reference to the requirements of the latest DWMP. • The draft Local Plan Vision could be enhanced through incorporating reference to protecting and enhancing water quality to ensure this aspiration is embedded throughout the Plan. • Development proposals should demonstrate measures to minimise waste generation during both construction and occupation. Development proposals should integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting for site end users.	• Policy DM15 (monitoring and managing vehicle trip generation) sets targets for lower vehicle trip generation and requires contributions towards the package of transport mitigation and monitoring. • MLP policies including T35 (provision of additional waste management capacity) promote the management of waste at the highest point practical in the waste hierarchy, and Policy DM5 (housing design) requires recycling and refuse storage to be built into the overall design of new development. • Policy DM4 (noise and light pollution) requires development proposals which are noise sensitive to demonstrate adequate mitigation to support a good quality of life and health.

[168] Kent Downs (2021) Kent Downs AONB Management Plan 2021-2026. Available at: https://kentdowns.org.uk/management-plan-2021-2026/ [Date accessed: 11/06/25]

[169] MHCLG (2020) Living with Beauty: Promoting health, well-being and sustainable growth: The report of the Building Better, Building Beautiful Commission. Available at: www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission [Date accessed: 11/06/25]

[170] CPRE (2005) Mapping Tranquillity. Available at: https://www.cpre.org.uk/resources/mapping-tranquility/ [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Interim SA Report	Medway Council response
	• Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with 'Net Zero the UK's contribution to stopping global warming'[171]. • A Water Cycle Study (WCS) should be used to provide evidence to inform strategic planning with regard to water resources, to help improve water quality and avoid the generation of pollution to watercourses and/or groundwater, especially given the increased number of houses and contemporary climate change issues. • It is recommended that development proposals include visual and auditory buffers at the edge of the development to help mitigate noise pollution from railway lines and main roads. Additionally, development proposals that could potentially result in an increase in noise disturbance should be adequately mitigated, through efficient layout, design and including noise insulation. • All development proposals should take into consideration recommendations within the relevant Air Quality Action Plan and outputs of the Annual Status Reports. Sites that are located in close proximity to AQMAs should consider measures to ease congestion within the surrounding area to reduce pressure on the AQMA.	
6: Natural Resources	• The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion. • Effective management should be in place to help prevent pollution and unnecessary compaction of soils during construction. Consider the requirement for Construction Environmental Management Plans in Planning Conditions. • Residential uses in town centres such as above retail areas should be promoted where appropriate, to help reduce the quantity of new land required to meet housing demands and make more efficient use of space, protecting greenfield land in the area. • Where impacts on BMV soil resources cannot be avoided, preference should be given to sites with lower ALC grade soils. Where possible, provide GI or open spaces to protect areas of BMV soil within a site boundary and/or encourage use of these areas for community allotments to promote local food production. • The draft Local Plan Vision could be enhanced by setting out a clear preference for brownfield development, seeking to make the best use of available land and redevelop urban centres. • Encourage the reuse of contaminated land for new development, where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use.	• Policy S15 (town centres strategy) supports residential uses above ground floor along high streets to support urban living and sustainable development. • Policy DM2 (contaminated land) sets out the need to remediate any contaminated land on sites allocated for development. • Policy DM1 (flood and water management) requires developments within a groundwater SPZ to have regard to relevant Water Resources Management Plans. • Policy S1 (planning for climate change) recognises that Medway lies in an area of water stress and requires measures to reduce water consumption.

[171] Committee on Climate Change (2019) Net Zero: The UK's contribution to stopping global warming. Available at: https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/ [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Interim SA Report	Medway Council response
	• Medway is located in an area of serious water stress as identified by the Environment Agency[172]. Medway Council should ensure that the findings and recommendations of the water companies' latest Water Resources Management Plans and Drought Plans are taken into account to ensure the proposed levels of growth can be accommodated and that water supply and demand can be balanced.	
7: Housing	• The MLP should ensure development proposals provide adequate indoor space in line with, or wherever possible exceeding, the requirements set out in the technical housing standards[173]. Residential development proposals should incorporate functional private or communal open space, including green space. • The MLP policies should ensure proposed sites for Gypsies, Travellers and Travelling Showpeople seek to provide suitable access to local services, healthcare, and schools to facilitate sustainable development and integration with the community. This could include measures such as developing travel plans to improve public transport connections. The layout and design of new sites should be carefully considered with reference to good practice guidance[174].	• Relevant MLP policies, including T1 (high quality design and amenity), set out amenity requirements including space standards to comply with. • Policy T10 (Gypsy, Travellers and Travelling Showpeople) sets out requirements for new and expanded sites including access, design and location.
8: Health and Wellbeing	• Development proposals should take into consideration the findings of the latest Playing Pitch Strategy[175] or other relevant documents within the evidence base to ensure that future demands for recreational facilities can be met. • Seek opportunities to improve or enhance the coverage and connectivity of the PRoW and cycle network across the Plan area, and ensure development proposals do not result in detrimental impacts to the safety of pedestrians and cyclists. • In line with the emerging Green and Blue Infrastructure Framework[176], the Local Plan should ensure that road layouts incorporate urban greening schemes, and provide active travel routes through greenspace to help reduce exposure to air pollution and improve health.	• Policy T28 (existing open space, outdoor sports and play spaces) requires consideration of the Council's Open Space Assessment and Playing Pitch Strategy when considering any potential for redevelopment of existing facilities. • Several MLP policies including S5 (securing strong green and blue infrastructure), T1 (high quality design and amenity) and site allocation policies highlight the need to improve pedestrian connectivity.

[172] Environment Agency (2021) Water Stressed Areas - final classification. Available at: https://www.gov.uk/government/publications/water-stressed-areas-2021-classification [Date accessed: 11/06/25]

[173] MHCLG (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf [Date accessed: 11/06/25]

[174] Communities and Local Government (2008) Designing Gypsy and Traveller Sites: Good Practice Guide. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsysites.pdf [Date accessed: 11/06/25]

[175] 4Global (2019) Medway Council Playing Pitch Strategy – Needs Assessment, October 2019. Available at: https://www.medway.gov.uk/downloads/file/4522/medway_council_playing_pitch_strategy_-_needs_assessment [Date accessed: 11/06/25]

[176] Medway Council (2021) Medway Green and Blue Infrastructure Framework. Consultation Draft 4 October 2021. Available at: https://www.medway.gov.uk/downloads/file/6279/medway_green_and_blue_infrastructure_framework [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Interim SA Report	Medway Council response
	• Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres.	• Various MLP policies seek to promote social cohesion and strong centres, including Policy SA8 (Hoo St Werburgh and Chattenden) that seeks to strengthen centres alongside planned growth in the area.
9: Cultural Heritage	• Where a development proposal could potentially result in substantial harm to the significance of a historic asset, clear justification should be provided, for example public benefits outweighing the harm to the asset. This will be particularly applicable if the Council intend to prepare any site policies to accompany specific allocations at the Regulation 19 stage. • The MLP should promote innovative re-use of existing building stocks, including developments which would improve the energy efficiency of historic buildings and take into account their embodied carbon value when considering their retention and re-use, versus their replacement. Medway Council should refer to Historic England's guidance on keeping historic buildings in good repair[177]. • It is recommended that all development proposals that are likely to impact heritage assets, particularly strategic sites, should be accompanied by a Heritage Impact Assessment[178]. • Furthermore, it is recommended where a development proposal could potentially coincide with an archaeological feature, the site should be subject to an appropriate archaeological desk-based assessment. • The proposed historic environment policies such as Policies DM9 and DM10 could be strengthened by ensuring that development will "*conserve and enhance*" rather than "*conserve or enhance*" the significance of heritage assets and conservation areas, ensuring that development conserves and seeks opportunities to enhance heritage assets and their settings. • Draft Local Plan policies relating to town centres and the built environment (such as Policies S15, S17 and DM14) could be strengthened through referencing the conservation and enhancement of cultural heritage features alongside the proposed enhancements to town centres, or cross referencing to historic environment policies.	• Policy DM9 (heritage assets) highlights the exceptional circumstances in which demolition or loss of a heritage asset will be permitted. • Policy DM9 further encourages vacant or 'at risk' heritage assets to be brought back into use and requires adherence to good practice guidance including Historic England's advice notes. • Various site allocation policies set out the requirement for a Heritage Impact Assessment to be prepared to inform the proposed development.
10: Transport and Accessibility	• Ensure all development proposals and travel plans aim to reduce the reliance on private car use wherever possible and applicable, and aim to promote access to local facilities and services in a manner which minimises emissions and promotes active travel.	• Policy DM20 has been updated to include reference to 'Building for a Healthy Life' guidance. • Policy DM19 (vehicle parking) sets out the

[177] Historic England (2023) Stopping the Rot: A guide to enforcement action to save historic buildings. Available at: https://historicengland.org.uk/images-books/publications/stoppingtherot/ [Date accessed: 11/06/25]

[178] DLUHC (2014). Historic environment. Advises on enhancing and conserving the historic environment. Available at: https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Interim SA Report	Medway Council response
	• Improving connectivity of active travel routes should be a priority, owing to the severance of many routes due to the landscape / townscape being dominated by the highway networks discouraging use. • Electric vehicle charging networks should be supported including improved distribution and quantity of charging points and public transport options across the Plan area, in particular the rural areas, recognising the crucial role that local authorities play in enabling the transition to electric vehicles[179]. • It is recommended that development proposals consider the recommendations of the National Cycling Strategy[180] and the National Design Guide[181] to create accessible spaces and promote active travel. Draft Policy DM20 relating to cycle parking and storage could be enhanced by cross referencing to the 'Building for a Healthy Life' guidance which sets out design recommendations in relation to the location and design of cycle parking in residential and non-residential developments to encourage greater use of cycling or scooters as a travel option. • Draft Policy T25 'user hierarchy and street design' only applies to those developments requiring a Design and Access Statement, often major development. The sustainability performance of the policy could be enhanced by stating how the policy can be applied to smaller developments that do not require a Design and Access Statement, where feasible. • The draft Local Plan policies relating to transport and accessibility, such as Policy T26, could be enhanced through including reference to public transport links to train stations for onward travel.	requirement to provide EV charging points, and Policy T26 (accessibility standards) encourages improved access to shared mobility including EV car clubs.
11: Education	• Seek to increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need. • Ensure that wherever possible, walkable neighbourhoods and safe routes are created, especially to primary schools. • In Medway's more rural areas, where it is less likely that walking to school is a viable option, travel plans or other transport assessments should be prepared to demonstrate how consideration has been given to prioritising sustainable travel options to schools over the use of private cars.	• Information on school capacity across Medway has been used by the Council to determine the need for expanded and new schools in specific locations to mitigate needs arising from planned development. See the Infrastructure Delivery Plan.
12: Economy	• Ensure employment-led proposals are located in close proximity to high-frequency bus stops or other sustainable transport options for employees to reach	• Policy DM20 (cycle parking and storage) sets out standards applying to non-

[179] Office for Zero Emission Vehicles (2025) On-Street Residential Chargepoint Scheme. Available at: https://www.gov.uk/government/publications/grants-for-local-authorities-to-provide-residential-on-street-chargepoints/grants-to-provide-residential-on-street-chargepoints-for-plug-in-electric-vehicles-guidance-for-local-authorities [Date accessed: 11/06/25]

[180] Highways England (2016). Cycling Strategy. Available at: https://assets.publishing.service.gov.uk/media/5a81965fed915d74e33ff04f/S150572_Cycling_Strategy.pdf [Date accessed: 11/06/25]

[181] MHCLG & DLUHC (2021). National design guide. Available at: www.gov.uk/government/publications/national-design-guide [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Interim SA Report	Medway Council response
and Employment	employment opportunities, informed by the latest available accessibility information. • Improve access to employment opportunities, through provision of bus stops or increased frequency of bus services, and/or improvements to the local pedestrian and cycle networks. • Infrastructure policies should be strongly worded to ensure potential for adverse effects on landscape, biodiversity and heritage assets associated with new employment-led development are considered and avoided/mitigated accordingly.	residential as well as residential developments with regard to cycle infrastructure and accessibility.

Table 18.2: *Recommendations made in the Regulation 19 SA and actions taken by Medway Council*

SA Objective	Recommendations made during preparation of the R19 SA Report	Medway Council response
MLP policies (see **Appendix H**)	• Policy S22 could be strengthened through including more specific reference to measures needed to achieve place making ambitions and set out how the new centre will benefit the local landscape.	• Policy S22 notes the need for a main centre in an "*attractive location … to ensure place making ambitions are achieved*." • The subsequent design criteria in Policy SA8 was strengthened to require "*a Hoo Planning Framework, including a masterplan, to guide planning applications and further approval of details*."
Site allocation policies (see **Appendix K**)	• Policies allocating brownfield sites / supporting regeneration (e.g. SA1 – Chatham, SA4 – Gillingham) could usefully include consideration of identifying any potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, in order to minimise embodied carbon emissions. Cross-reference to relevant provisions of other MLP policies such as Policy S1 may strengthen the site policies in this regard. • Several of the policies (particularly in urban area) could go further in supporting low-car or car-free development, and requiring incorporation of low-carbon or renewable technologies and sustainable design principles (or via cross-referencing to other MLP policies where relevant). • It is recommended that site policies are consistent in the level of detail and site specific requirements, with reference to the latest outputs of the evidence base. For example, Policy SA2 should include details regarding how flood risk on site (identified in the SFRA as "extreme" hazard) should be addressed and mitigated. All policies should encourage GI integration and provision of open space, that can deliver multi-functional benefits. • Where it is listed in policy text that further evidence is required (e.g. "transport study", "green infrastructure strategy" or "HIA"), it may be helpful if the policy could briefly highlight what the envisaged output of these studies will be / how the development should use this information.	• Several site allocation policies require a masterplan at a subsequent planning stage. The Council will lean on the SA recommendations to define planning principles. • The criteria in several site allocation policies were strengthened to require GI strategies to inform masterplans. • Several site allocation policies were amended to incorporate wording regarding minimising embodied emissions. • Policy DM23 requires development proposals to facilitate re-use existing structures as far as possible. • Policy DM19 refers to the current Parking Standard, which allows for a reduction in the car parking provision, particularly in town centre locations. • Local policy requirements above building standards would very likely be an issue for development viability,

SA Objective	Recommendations made during preparation of the R19 SA Report	Medway Council response
	• Given the location of sites allocated under Policy SA7 – Capstone Valley with respect to the Kent Downs National Landscape it is recommended that further site-specific landscape evaluations (e.g., a Landscape and Visual Impact Assessment) are undertaken to understand the extent to which development can be accommodated without harm to the setting of the National Landscape. • It is recommended that further details are incorporated into Policy SA13 to provide clarity on the purpose and content of the proposed Frindsbury Peninsula Planning Framework and how it will address the on-site challenges and opportunities. • Additional wording could be incorporated into Policy SA14 – Employment, or via cross-reference to other MLP policies such as Policy T12: Learning and Skills Development, to ensure opportunities are sought for research, apprenticeships and development of skills where practicable.	given the findings of the Viability Assessment. • The site allocations avoid repetition or duplication of strategic, thematic or development management policies.

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19 Conclusions

19.1 Residual effects following mitigation

19.1.1 The SA has assessed the site allocations and policies proposed in the MLP using the methodology in **Chapter 4** and assumptions as set out in **Appendix E**. A range of sustainability effects have been identified, which are highlighted throughout the policy and site assessments in **Appendices F, G, H** and **K** with residual positive, negligible and negative effects summarised and discussed in **Chapters 7** to **15**.

19.1.2 Proposals in the MLP vary in terms of their sustainability performance with likely positive effects expected on some SA Objectives and adverse effects on others. The SA has identified likely sustainability effects of MLP proposals alone and in-combination.

19.1.3 The MLP is anticipated to result in a range of positive effects on sustainability, which are summarised in **Table 19.1**.

19.1.4 The mitigation proposals presented in the MLP provide positive planning mechanisms for delivering sustainable development where the Plan is able to reasonably address the issue. It is recognised that the Plan cannot fully address the sustainability effects of national and international trends, such as increased frequency of storm events associated with climate change.

19.1.5 As outlined in **Table 19.2**, there are a range of residual adverse effects that are identified as a result of the MLP.

Table 19.1: *Likely residual positive sustainability effects of the MLP*

	Summary of residual positive effects
1	**Protection and enhancement of the ecological network** The MLP policies are likely to enhance habitat connectivity and strengthen the resilience of ecological and GI networks against current and future pressures. They support the conservation and expansion of GI coverage, along with the creation of new habitats, providing opportunities to improve connections between biodiversity features. Additionally, the policies promote the principles of the emerging Kent and Medway Local Nature Recovery Strategy. Overall, a long-term positive impact on biodiversity is anticipated.
2	**Protection and enhancement of multi-functional green infrastructure** Although there may be some loss of previously undeveloped land associated with development sites that comprise or contain greenfield land, various MLP policies seek to conserve and enhance multi-functional green and blue infrastructure across the Plan area as a whole. Supporting the delivery of GI throughout the Plan area, a positive effect is expected with regard to Medway's ability to adapt to climate change.
3	**Provision of public greenspace** The MLP policies will be expected to ensure that development proposals do not result in a loss of public greenspace across the borough, leading to a negligible overall effect. Further positive impacts on access to greenspace could be achieved in the longer term, through the provision of on-site or off-site GI provisions, dependent on more site-specific context and information.
4	**Provision of new homes** The MLP proposes the development of 21,194 new homes, which in combination with consented sites and windfall sites, will meet the locally identified housing need of 24,540 homes according to the latest Standard Method calculation. Policies in the Plan set out the requirements to provide an appropriate mix of housing types and tenures, seeking to meet the needs of different groups, including older people. A positive effect on housing provision is anticipated.

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	Summary of residual positive effects
5	**Provision of employment opportunities** The MLP proposes the development of sufficient employment land to meet the locally identified need of 204,000 sqm of industrial floorspace and 36,500 sq m of office floorspace according to the ELNA. The Plan provides land for a portfolio of employment sites that meet the needs of different types of businesses, recognising the potential to realise the strategic economic role of sites such as Grain and Kingsnorth in growing sectors. A positive effect on employment provision is anticipated.
6	**Preservation of mineral resources** The MLP policies, incuding T30 and T31, will be expected to ensure that potential impact on safeguarded minerals is avoided or minimised. A minor positive effect on the conservation of mineral resources is likely.

Table 19.2: *Likely residual adverse sustainability effects of the MLP*

	Summary of residual adverse effects
1	**Increased generation of, and exposure to, air pollution** Despite technological and infrastructure advancements, the proposed development of new homes and employment sites within the Plan area will be expected to cumulatively increase the volume of traffic and a result in a greater demand for energy. As such, increased pollutant emissions, particularly NO_2 and PM_{10}, will be likely that cannot be fully mitigated by MLP policies alone. The continued transition to clean technologies will take place over the coming years.
2	**Threats or pressures to biodiversity designations** The MLP policies set out a protective framework that will be expected to identify, avoid and mitigate adverse effects on the majority of biodiversity designations. However, the policies are not anticipated to fully mitigate adverse where proposed sites coincide with, or are located directly adjacent to, SSSIs. These sites should be subject to specific consultation with Natural England, some of which are likely to be addressed as the Hoo Peninsula Strategic Environmental Programme develops. The MLP policies will not be expected to fully mitigate adverse effects on sites which coincide with or are directly adjacent to an LNR or LWS, where there is potential for direct habitat loss or degradation of the habitats associated with the designations. At the time of writing, in absence of the final HRA conclusions regarding air quality and recreational impacts, the effect of the MLP on European sites is uncertain.
3	**Increased GHG emissions** Although the relevant MLP policies will be expected to have a positive impact in helping to reduce GHG emissions, particularly in regard to energy efficient design and low carbon sources, these measures are not expected to fully mitigate the impacts associated with the large quantum of growth expected from the Plan. An increase in GHG emissions as a consequence of the proposed development is expected to be a long-term and permanent significant effect.
4	**Sustainable access to healthcare and leisure facilities** Local Plan policies will help to prevent the loss of existing healthcare facilities and improve sustainable access to facilities for some residents; however, the policies will not be expected to fully mitigate the restricted access to healthcare services for sites in more isolated settlements. Limited sustainable access to healthcare facilities is expected to be a medium-term and temporary significant effect.
5	**Alteration of landscape character and sensitive / locally distinctive landscapes** Due to the scale of development proposed, with a large proportion in previously undeveloped locations, these policies are not expected to fully mitigate the potential impacts on landscape character and a residual adverse effect is anticipated. Alteration of the landscape character is a long-term and permanent significant effect. There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan.

	Summary of residual adverse effects
6	**Increase urban sprawl and coalescence between settlements** Various MLP seek to minimise impacts on the countryside and maintain separation between settlements. However, due to the rural context within which some of the new development is situated, the MLP policies will not be expected to fully mitigate these impacts and a residual adverse effect is anticipated. An increased risk of urbanisation of the countryside and coalescence is a long-term and permanent significant effect.
7	**Waste generation** The WNA[182] found sufficient existing consented capacity to meet requirements for recycling, composting and inert waste over the Plan period, but a shortfall in non-inert waste to landfill. The construction and occupation of new homes and businesses could cumulatively increase non-inert waste production and potentially impact the capacity of existing waste facilities. The cumulative impact of increased waste generation on the capacity of waste management facilities could potentially be a medium-term, but potentially temporary, significant effect.
8	**Loss of soil resources** The proposed allocations would cumulatively result in the loss of a significant amount of previously undeveloped land. The loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across the borough. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality and agricultural yield. The loss of previously undeveloped land, a large proportion of which could include BMV land, is expected to be a long-term and permanent significant effect.
9	**Reduction in water quality** It is likely that provisions set out in the MLP policies, and consultation with water companies, will partially mitigate impacts on water quality and ecosystem services. The implementation of SuDS will also help to treat diffuse pollution at the source to avoid adverse impacts on water quality. However, development is also likely to increase the quantity of raw sewage being disposed of in river channels, which will require additional monitoring in order to alleviate water quality issues. A residual adverse impact on water quality and ecosystem services is therefore identified, in line with the precautionary principle. Deterioration in water quality and ecosystem services has the potential to be a long-term but potentially temporary significant effect.

19.2 Consultation and next steps

19.2.1 This report represents the latest stage of the SA process. As per Regulation 13 of 'The Environmental Assessment of Plans and Programmes Regulations 2004'[183], this Regulation 19 SA Report will be published alongside the Publication Version of the Plan. Consultation findings will be used to inform subsequent stages of the SA process.

19.2.2 A six-week period of consultation under the Town and Country Planning Act will be undertaken by Medway Council to offer individuals, businesses and other organisations an opportunity to submit representations regarding the MLP.

19.2.3 Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.

[182] BPP Consulting (2024) Medway Local Plan – Waste Evidence Base. Medway Waste Needs Assessment Update. Available at: https://medway.oc2.uk/document/20 [Date accessed: 13/06/25]

[183] The Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 13: Consultation procedures. Available at: https://www.legislation.gov.uk/uksi/2004/1633/regulation/13/made [Date accessed: 29/04/25]

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys

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Sustainability Appraisal of the Medway Local Plan

Volume 3 of 3: Appendices

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Sustainability Appraisal of the Medway Local Plan 2025–2041

Volume 3 of 3: Appendices of the Regulation 19 SA

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Appendix I: Assessment of Reasonable Alternative Sites (Post-Mitigation)
Appendix J: Selection and Rejection of Reasonable Alternative Sites
Appendix K: Assessment of Site Allocation Policies

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Appendix A: Plan, Policy, and Programme Review

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A.1 Air

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to air
EC Air Quality Directive (1996)[1]	Aims to improve air quality throughout Europe by controlling the level of certain pollutants and monitoring their concentrations. In particular, the Directive aims to establish levels for different air pollutants; draw up common methods for assessing air quality; methods to improve air quality; and make sure that information on air quality is easily accessible to Member States and the public.
Clean Air Strategy (2019)[2]	This Clean Air Strategy sets out how the Government will tackle all sources of air pollution, making air healthier to breathe, protecting nature and boosting the economy. The strategy includes targets such as a commitment to reduce PM2.5 concentrations across the UK, so that the number of people living in locations above the World Health Organisation (WHO) guideline level of 10 µg/m3 is reduced by 50% by 2025.
National Planning Policy Framework (2024)[3]	The NPPF states that plans should prevent development from contributing to, or being put at risk of, air or water pollution. Plans should consider the presence of Air Quality Management Areas (AQMAs) and cumulative impacts on air quality from individual sites in local areas.
A Green Future: Our 25 Year Plan to Improve the Environment (2018)[4]	The document sets out government action to help achieve natural world regain and retain good health. The Plan seeks to achieve clean air by: • Meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030; • Ending the sale of new conventional petrol and diesel cars and vans by 2040; and • Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework. The 2021 Environment Act (9th November 2021) embeds several of these aspects into legislation.

[1] EC Air Quality Directive (1996) Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31996L0062&from=ES [Date accessed: 06/01/25]

[2] DEFRA et al. (2019) Clean Air Strategy 2019. Available at: www.gov.uk/government/publications/clean-air-strategy-2019 [Date accessed: 06/01/25]

[3] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf [Date accessed: 06/01/25]

[4] DEFRA (2021) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: www.gov.uk/government/publications/25-year-environment-plan [Date accessed: 31/12/24]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to air
Environmental Improvement Plan 2023[5]	The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve clean air, the EIP sets out to: • Cut overall air pollution by tackling the key sources of emissions, including reducing the maximum limits for domestic burning appliances in Smoke Control Areas. • Tackle specific hotspots by challenging councils to improve air quality more quickly, while supporting them with clear guidance, funding, and tools. • Reduce ammonia emissions (crucial for sensitive natural habitats) by using incentives in our new farming schemes, investing £13 million in slurry storage infrastructure in 2023 and considering expanding environmental permitting conditions to dairy and intensive beef farms.
Air quality plan for nitrogen dioxide (NO_2) in UK (2018)[6]	National plan to tackle the issue of air pollution throughout the country.
Kent Environment Strategy[7]	Sets targets in relation to the quality of the environment. One target being to decrease the number of days of moderate or high air pollution and the concentration of pollutants (align with the Kent and Medway Air Quality Partnership and national monitoring standards).
Kent and Medway Energy and Low Emission Strategy (2020)[8]	Document sets out how Kent and Medway will respond to the UK climate emergency. Focusing on four aims: evidence, policy and strategy, leadership, and action. The strategy has a vision of net-zero emissions by 2050 for the county of Kent; where there will be no deaths associated with poor air quality due to competitive, innovative and a resilient low carbon economy.

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[5] DEFRA (2023) Environmental Improvement Plan 2023. Available at: www.gov.uk/government/publications/environmental-improvement-plan [Date accessed: 06/01/25]

[6]Department for Environment, Farming and Rural Affairs and Department for Transport (2018) Air quality plan for nitrogen dioxide (NO2) in UK. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf [Date accessed: 06/01/25]

[7] Kent County Council (2016) Kent Environment Strategy. Available at: www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf [Date accessed: 06/01/25]

[8] Kent County Council (2020) Kent and Medway Energy and Low Emission Strategy, June 2020. Available at: www.kent.gov.uk/__data/assets/pdf_file/0009/112401/Kent-and-Medway-Energy-and-Low-Emissions-Strategy.pdf [Date accessed: 06/01/20]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to air
Medway Air Quality Action Plan 2024 (draft)[9]	This plan replaces the previous action plan which ran from 2015-2020. The plan includes actions that fall under seven broad topics including: • Freight and delivery management • Policy guidance and development control • Promoting low emission transport • Promoting travel alternatives • Public information • Transport planning and infrastructure • Traffic management The report identifies the first aim to bring about compliance with the Air Quality Strategy objectives across Medway, focusing on NO_2 concentrations within the Central Medway, Gillingham, and Rainham AQMAs.
Medway Council Air Quality Annual Status Report (ASR) (2024)[10]	The ASR highlights a trend of decreasing measured concentrations of NO_2 at most sites from 2011 to 2023, however exceedances of the NO_2 annual mean concentrations are still observed at one monitoring site within Four Elms Hill AQMA. The ASR notes Medway Council's priorities for the future including those outlined in the Air Quality Action Plan, seeking to improve air quality and in particular reduce road traffic emissions whilst accommodating the large demand for development in the authority area.

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[9] Medway Council (2024) Medway Air Quality Action Plan 2024 (draft). Available at: www.medway.gov.uk/downloads/file/7339/medway_air_quality_action_plan_2024_draft [Date accessed: 06/01/25]

[10] Medway Council (2024) Air Quality Annal Status Report (ASR) Available at: https://www.kentair.org.uk/report/medway-council-annual-status-report-2024 [Date accessed: 10/06/25]

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A.2 Biodiversity, flora and fauna

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
UN Convention on Biological Diversity (1992)[11]	The aims of the Convention include the conservation of biological diversity (including a commitment to significantly reduce the current rate of biodiversity loss), the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilisation of genetic resources.
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)[12]	The Convention seeks to conserve wild flora and fauna and their natural habitats, and to monitor and control endangered and vulnerable species.
Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 1992 (the Habitats Directive)[13]	The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status, introducing robust protection for those habitats and species of European importance. The provisions of the Directive require Member States to introduce a range of measures, including: • Maintain or restore European protected habitats and species listed in the Annexes at a favourable conservation status as defined in Articles 1 and 2; • Contribute to a coherent European ecological network of protected sites by designating Special Areas of Conservation (SACs) for habitats listed on Annex I and for species listed on Annex II. These measures are also to be applied to Special Protection Areas (SPAs) classified under Article 4 of the Birds Directive. Together SACs and SPAs make up the Natura 2000 network (Article 3); • Ensure conservation measures are in place to appropriately manage SACs and ensure appropriate assessment of plans and projects likely to have a significant effect on the integrity of an SAC. Projects may still be permitted if there are no alternatives, and there are imperative reasons of overriding public interest. In such cases compensatory measures are necessary to ensure the overall coherence of the Natura 2000 network (Article 6); • Member States shall also endeavour to encourage the management of features of the landscape that support the Natura 2000 network (Articles 3 and 10); • Undertake surveillance of habitats and species (Article 11); • Ensure strict protection of species listed on Annex IV (Article 12 for animals and Article 13 for plants). • Report on the implementation of the Directive every six years (Article 17), including assessment of the conservation status of species and habitats listed on the Annexes to the Directive.

[11] UN Convention on Biological Diversity (1992) Available at: https://www.cbd.int/doc/legal/cbd-en.pdf [Date accessed: 07/01/25]

[12] Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979) Available at: https://rm.coe.int/1680078aff [Date accessed: 07/01/25]

[13] Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043 [Date accessed: 07/01/25]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations)[14]	The Habitats Regulations transposes into UK national law the Habitats Directive and also consolidates all amendments that have been made to the previous 1994 Regulations. This means that competent authorities have a general duty in the exercise of any of their functions to have regard to the Directive.
A Green Future: Our 25 Year Plan to Improve the Environment (2018)[15]	The document sets out government action to help achieve natural world regain and retain good health. The main goals of the Plan are to achieve: • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment.
Environmental Improvement Plan 2023[16]	The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of our country. The apex goal of the EIP is to improve nature, achieving thriving plants and wildlife, building on the Global Biodiversity Framework as agreed at the UN Nature Summit COP15 including a commitment to protect 30% of global land and 30% of global ocean by 2030. To achieve this, the EIP sets out to: • Launch the Species Survival Fund to create, enhance and restore habitats. • Create, restore, and extend around 70 areas for wildlife through projects including new National Nature Reserves, and the next rounds of the Landscape Recovery Projects. • Protect 30% of our land and sea for nature through the Nature Recovery Network and enhanced protections for our marine protected areas. We intend to designate the first Highly Protected Marine Areas this year. • Implement the Environment Act 2021, including rolling out Local Nature Recovery Strategies to identify areas to create and restore habitat, and Biodiversity Net Gain to enhance the built environment.

[14] The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) Available at: www.legislation.gov.uk/uksi/2017/1012/contents/made [Date accessed: 07/01/25]

[15] A Green Future: Our 25 Year Plan to Improve the Environment Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 07/01/25]

[16] DEFRA (2023) Environmental Improvement Plan 2023. Available at: www.gov.uk/government/publications/environmental-improvement-plan [Date accessed: 07/01/25]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
DEFRA: Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)[17]	The England biodiversity strategy 2020 ties in with the EU biodiversity strategy in addition to drawing links to the concept of ecosystem services. The strategy's vision for England is: "*By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed sustainably and be more resilient and able to adapt to change, providing essential services and delivering benefits for everyone*". The Strategy's overall mission is: "*to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people*".
TCPA: Biodiversity by Design: A Guide for Sustainable Communities (2004)[18]	The development process should consider ecological potential of all areas including both greenfield and brownfield sites. Local authorities and developers have a responsibility to mitigate impacts of development on designated sites and priority habitats and species and avoid damage to ecosystems.
National Planning Policy Framework (2024)[19]	The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by: • protecting and enhancing valued landscapes, geological conservation interests and soils; • recognising the wider benefits of ecosystem services; • minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; • preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and • remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

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[17] DEFRA (2011). Biodiversity 2020: A strategy for England's wildlife and ecosystem services. Available at: www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services [Date accessed: 07/01/25]

[18] TCPA (2004) Biodiversity by Design: A Guide for Sustainable Communities. Available at: https://library.uniteddiversity.coop/Ecovillages_and_Low_Impact_Development/Biodiversity%20by%20Design.pdf [Date accessed: 17/01/25]

[19] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf [Date accessed: 07/01/25]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
Making Space for Nature: a review of England's wildlife sites and ecological network (2010)[20]	The Making Space for Nature report, which investigated the resilience of England's ecological network to multiple pressures, concluded that England's wildlife sites do not comprise of a coherent and resilient ecological network. The report advocates the need for a step change in conservation of England's wildlife sites to ensure they are able to adapt and become part of a strong and resilient network. The report summarises what needs to be done to improve England's wildlife sites to enhance the resilience and coherence of England's ecological network in four words; more, bigger, better, and joined. There are five key approaches which encompass these, which also take into account of the land around the ecological network: • Improve the quality of current sites by better habitat management. • Increase the size of current wildlife sites. • Enhance connections between, or join up, sites, either through physical corridors, or through 'stepping stones'. • Create new sites. • Reduce the pressures on wildlife by improving the wider environment, including through buffering wildlife sites.
The England Trees Action Plan 2021-2024 (2021)[21]	The Trees Action Plan sets out how the government will tackle the challenges of biodiversity loss and climate change, in line with the goals of the 25 Year Environment Plan. The plan provides a strategic framework for implementing the Nature for Climate Fund and outlines over 80 policy actions the government is taking over this Parliament to help deliver this vision. Planting vastly more trees in England, and protecting and improving our existing woodlands, will be key to the government's plan to achieve net zero and to create a Nature Recovery Network across the length of England.
The Natural Choice: Securing the Value of Nature. The Natural Environment White Paper. (HM Government 2011)[22]	Published in June 2011, the Natural Environment White paper sets out the government's plans to ensure the natural environment is protected and fully integrated into society and economic growth. The White Paper sets out four key aims: • Protecting and improving our natural environment; • Growing a green economy; • Reconnecting people and nature; and • International and EU leadership.

[20] Making Space for Nature: a review of England's wildlife sites and ecological network (2010) Available at: www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today [Date accessed: 07/01/25]

[21] DEFRA (2021) England Trees Action Plan 2021 to 2024. Available at: www.gov.uk/government/publications/england-trees-action-plan-2021-to-2024 [Date accessed: 07/01/25]

[22] The Natural Choice: Securing the Value of Nature. The Natural Environment White Paper. (HM Government 2011) Available at: www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature [Date accessed: 07/01/25]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
Natural England Site Improvement Plans: • **North Downs Woodlands SAC[23]** • **Greater Thames Complex[24]** • **Peters Pit SAC[25]**	The plans provide a high-level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 features on the sites and outlines the priority measures required to improve the condition of the features.
A Living Landscape for the South East (2006)[26]	This document sets out a vision for the South East Ecological Network. The network will act as a model for rebuilding the regions biodiversity in a way which will: • Increase the ability of the environment to deliver ecosystem services. • Link places where people live to wild places and the wider countryside. • Link and extend important wildlife sites and habitats, and buffer wild species against the impacts of climate change.
Kent Nature Partnership Biodiversity Strategy 2020 to 2045 [27]	The Kent Biodiversity Strategy aims to deliver, over a 25-year period, the maintenance, restoration, and creation of habitats that are thriving with wildlife and plants, ensuring the county's terrestrial, freshwater, intertidal and marine environments regain and retain good health. The Strategy looks to protect and recover threatened species and enhance the wildlife habitats that Kent is particularly important for. The strategy sets out the following goals in Kent to be achieved for 2045: • A rich and growing terrestrial biodiversity, underpinned by more resilient and coherent ecological networks and healthy, well-functioning ecosystems. • Clean, plentiful and biologically diverse freshwater and intertidal ecosystems underpinned by implementation of a catchment based approach. • A reverse in the loss of marine biodiversity and delivering clean, productive and biologically diverse oceans and seas through good management. • The widest possible range of ages and backgrounds will be benefiting from the mental and physical health benefits of the natural environment; and we will have inspired the next generation to take on guardianship of the county's biodiversity.

[23] Natural England (2015) Site Improvement Plan: North Downs Woodlands. Available at: https://publications.naturalengland.org.uk/publication/6363401429188608 [Date accessed: 07/01/25]

[24] Natural England (2015) Site Improvement Plan: Greater Thames Complex. Available at: https://publications.naturalengland.org.uk/publication/6270737467834368 [Date accessed: 07/01/25]

[25] Natural England (2014) Site Improvement Plan: Peters Pit. Available at: https://publications.naturalengland.org.uk/publication/5643865918799872 [Date accessed: 07/01/25]

[26] The South East Wildlife Trusts (2006) A Living Landscape for the South East. Available at: https://dnu7gk7p9afoo.cloudfront.net/a-living-landscape-for-the-south-east.pdf [Date accessed: 07/01/25]

[27] Kent Nature Partnership Biodiversity Strategy 2020 to 2045. Available at: https://democracy.kent.gov.uk/documents/s96710/20-00025%20-%20Kent%20Biodiversity%20Strategy%20March%202020.pdf [Date accessed: 07/01/25]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
Kent Environment Strategy (2016)[28]	Sets targets in relation to the quality of the environment. In relation to biodiversity the following targets have been set: • A minimum of 65% of local wildlife sites will be in positive management and 95% of SSSIs will be in favorable recovery by 2020. • 60% of local wildlife sites will be in positive management. • SSSIs will be in favourable or recovering status by 2020. • Status of bird and butterfly specifies in Kent and Medway are quantified. • Complete a natural capital assessment for Kent by 2017.
Kent and Medway Making Space for Nature Programme[29] and Local Nature Recovery Strategy Part 1 and Part 2 (2024)	Making Space for Nature in Kent and Medway will work with partners and stakeholders to collaboratively establish shared priorities for the delivery of nature recovery and environmental improvements, in order to create a network of wildlife-rich places across the county. This local nature recovery strategy (LNRS) will be one of 48 – together these will cover the whole of England, with no gaps or overlaps, to deliver the government's commitment to ending the decline of nature and supporting its recovery. Kent County Council is the Responsible Authority for developing the county's LNRS. The LNRS is set out in two separate documents: • Part 1 'Setting the Scene for Nature Recovery Strategy in Kent and Medway' provides baseline information regarding the LNRS, Kent and Medway's natural landscape, special features of Kent and Medway's nature, and nature recovery opportunities. • Part 2 'Priorities, Potential Measures and Areas That Could Become of Importance for Biodiversity' provides the overarching principles of the LNRS, the vision for the LNRS, and priorities and potential measures which includes nature-based solutions, land management, species and habitats.
Medway Valley Strategic Landscape Enhancement Plan (2015)[30]	The Strategic Landscape Enhancement Plan (SLEP) will use landscape as the common thread to tie together cross disciplinary aspirations and aims. It also sets out opportunities for biodiversity and water quality enhancement: • Enhance wildlife connectivity between sites. • Improve the management of woodland, hedgerows and • Trees, and improve their resilient to climate change. • Manage wetland sites and expand them where practical. • To enhance biodiversity value and flood storage capacity. • Increase the biodiversity value of rivers and streams. • Work with developers and planners to achieve positive biodiversity gains through new development.

[28] Kent County Council (2016) Kent Environment Strategy. Available at: www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf [Date accessed: 07/01/25]

[29] Kent County Council (2024) Making Space for Nature in Kent and Medway. Available at: www.makingspacefornaturekent.org.uk/ [Date accessed: 10/01/25]

[30] Medway Valley Strategic Landscape Enhancement Plan (2015) Available at: https://healthsustainabilityplanning.co.uk/wp-content/uploads/2015/06/MVSLEP-Complete-FINAL-Low-Res-27.03.151.pdf [Date accessed: 07/01/25]

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A.3 Climatic factors

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
UN Framework Convention on Climate Change (1992)[31]	Sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change.
IPCC Kyoto Protocol to the United Nations Framework Convention on Climate Change (1997)[32]	Commits member nations to reduce their emissions of carbon dioxide and other greenhouse gases, or engage in emissions trading if they maintain or increase emissions of these gases.
EC Sixth Environmental Action Programme Community 2002-2012 (2002)[33]	Climate change has been identified as one of four priority areas for Europe. The EAP's main objective is a reduction in emissions of greenhouse gases without a reduction in levels of growth and prosperity, as well as adaptation and preparation for the effects of climate change.
EU Sustainable Development Strategy (2006)[34]	This Strategy identifies key priorities for an enlarged Europe. This includes health, social inclusion and fighting global poverty. It aims to achieve better policy integration in addressing these challenges, and to ensure that Europe looks beyond its boundaries in making informed decisions about sustainability. The Sustainable Development Strategy was review in 2009 and "underlined that in recent years the EU has mainstreamed sustainable development into a broad range of its policies. In particular, the EU has taken the lead in the fight against climate change and the promotion of a low-carbon economy. At the same time, unsustainable trends persist in many areas and the efforts need to be intensified". Sustainable development is a key focus of the EU and the strategy continues to be monitored and reviewed.
UK Renewable Energy Strategy (2009)[35]	The UK has committed to sourcing 15% of its energy from renewable sources by 2020 – an increase in the share of renewables from about 2.25% in 2008. The Renewable Energy Strategy sets out how the Government will achieve this target through utilising a variety of mechanisms to encourage Renewable Energy provision in the UK. This includes streamlining the planning system, increasing investment in technologies as well as improving funding for advice and awareness raising.
UK Renewable Energy Roadmap Update (2013)[36]	This is the second Update to the 2011 Renewable Energy Roadmap. It sets out the progress that has been made and the changes that have occurred in the sector over the past year. It also describes the continuing high ambitions and actions along with the challenges going forward.

[31] UN Framework Convention on Climate Change (1992) Available at: https://unfccc.int/resource/docs/convkp/conveng.pdf [Date accessed: 07/01/25]

[32] IPCC Kyoto Protocol to the United Nations Framework Convention on Climate Change (1997) Available at: https://unfccc.int/resource/docs/convkp/kpeng.pdf [Date accessed: 07/01/25]

[33] EC Sixth Environmental Action Programme Community 2002-2012 Available at: https://ec.europa.eu/environment/archives/action-programme/strategies_en.htm [Date accessed: 07/01/25]

[34] EU Sustainable Development Strategy (2006) Available at: https://www.eea.europa.eu/policy-documents/renewed-eu-strategy-for-sustainable-development [Date accessed: 07/01/25]

[35] UK Renewable Energy Strategy (2009) Available at: https://www.gov.uk/government/publications/the-uk-renewable-energy-strategy [Date accessed: 07/01/25]

[36] UK Renewable Energy Roadmap Update Available at: www.gov.uk/government/publications/uk-renewable-energy-roadmap-second-update [Date accessed: 07/01/25]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
The UK Low Carbon Transition Plan (2009)[37]	The UK Low Carbon Transition Plan sets out how the UK will meet the Climate Change Act's legally binding target of 34% cut in emissions on 1990 levels by 2020. It also seeks to deliver emissions cuts of 18% on 2008 levels. The main aims of the Transition Plan include the following: • Producing 30% of energy from renewables by 2020; • Improving the energy efficiency of existing housing; • Increasing the number of people in 'green jobs'; and • Supporting the use and development of clean technologies.
Department for Transport, The Road to Zero (2018)[38]	This report outlines the transition to zero-emission road transport. This includes measures to reduce emissions from vehicles including specific targets for Heavy Goods Vehicles (HGVs), promoting low- and zero- emission cars and developing high quality electric vehicle infrastructure networks. The document sets out new measures to place the UK at the forefront of designing and manufacturing zero emission vehicles. One of the main aims in the document is for almost every car/van to be zero emission by 2050, a long-term aim. The transition is stated to be led by industry and consumers and how a strong, clean economy can be achieved.
Powering Up Britain (2023)[39]	This document provides a blueprint of the Government's plans for the future of energy in the UK. It focusses on energy security and the drive to Net Zero. This document was the first to be published by the new Department for Energy Security and Net Zero.

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[37] The UK Low Carbon Transition Plan Available at: www.gov.uk/government/publications/the-uk-low-carbon-transition-plan-national-strategy-for-climate-and-energy [Date accessed: 07/01/25]

[38] Department for Transport, The Road to Zero (2018) Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf [Date accessed: 31/12/24]

[39] HM Government (2023) Powering Up Britain. Available at: https://assets.publishing.service.gov.uk/media/642468ff2fa8480013ec0f39/powering-up-britain-joint-overview.pdf [Date accessed: 01/07/24]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
National Planning Policy Framework (2024)[40]	The NPPF includes guidance on climate change, flooding, and coastal change. Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. To support the move to a low carbon future, planning authorities should: • plan for new development in locations and ways which reduce greenhouse gas emissions; • actively support energy efficiency improvements to existing buildings; and • when setting any local requirement for a building's sustainability, do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by: • applying the Sequential Test; • if necessary, applying the Exception Test; • safeguarding land from development that is required for current and future flood management; • using opportunities offered by new development to reduce the causes and impacts of flooding.
Environmental Improvement Plan 2023[41]	The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of our country. To mitigate and adapt to climate change, the EIP sets out to: • Update on our progress and plans to reach net zero. • Publish a Land Use Framework in 2023, setting out how we will balance multiple demands on our land including climate mitigation and adaptation. • Publish the third National Adaptation Programme (NAP3) in 2023 that will set out our five year strategy to build the UK's climate resilience. • Continue our role as a global leader in tackling climate change, biodiversity loss and land degradation and push for an integrated approach to international action.

[40] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf [Date accessed: 04/12/24]

[41] DEFRA (2023) Environmental Improvement Plan 2023. Available at: www.gov.uk/government/publications/environmental-improvement-plan [Date accessed: 07/01/25]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
Energy Saving Trust: Renewable Energy Sources for Homes in Urban Environments (2005)[42]	Provides information about the integration of renewable energy sources into new and existing dwellings in urban environments. It covers the basic principles, benefits, limitations, costs and suitability of various technologies.
Environment Agency, Adapting to Climate Change: A Checklist for Development (2005)[43]	The document contains a checklist and guidance for new developments to adapt to climate change. The main actions are summarised in a checklist.
The Climate Crisis: A Guide for Local Authorities on Planning for Climate Change (2021)[44]	This guide is intended as an introduction to some of the key issues associated with the climate crisis, to ensure that Local Planning Authorities: 1. Ensure that tackling the climate crisis is at the heart of the vision for the future of our communities; 2. Recognise how vital planning is to securing that vision – both directly, through facilitating the extension of renewable energy generation, and strategically, through practical nature-based solutions and design actions that can promote sustainable travel, urban cooling, or natural flood defence; and 3. Finally, recognise how many of the actions necessary to tackle the climate crisis are also key in creating healthy, ecologically rich, prosperous and beautiful places for us and for future generations. The guide is intended as a starting point on the vital journey to put in place practical solutions which will halt the rise in temperatures and begin to reverse the climate crisis.
Kent Environment Strategy[45]	Strategy that looks to support a competitive and resilient economy, with business innovation in low carbon and environmental services driving economic growth. The strategy looks to drive its environment strategy through three themes: • Building the foundations for delivery: 1. Bridging gaps in understanding our risks and opportunities to identify actions; 2 Integrating and influencing strategy and policy; 3 Building resources, capabilities and changing behavior; 4 Monitoring and evaluation. • Making best use of existing resources. • Toward a sustainable future regarding resilience from the county's communities, businesses and services under environmental pressures and threats. In relation to wider climate aims, Kent County Council is aware of the action it must take to combat the wider climate emergency. Additional low carbon and appropriate renewable energy infrastructure, as well as an increase in uptake of energy efficiency initiatives will be needed to ensure targets are met.

[42] Energy Saving Trust: Renewable Energy Sources for Homes in Urban Environments Available at: www.buildingcentre.co.uk/media/_file/pdf/22220_pdf30.pdf [Date accessed: 07/01/25]

[43] Environment Agency, Adapting to Climate Change: A Checklist for Development Available at: www.ukcip.org.uk/wp-content/Wizard/Checklist_for_development.pdf [Date accessed: 07/01/25]

[44] TCPA & RTPI (2021) The Climate Crisis: A Guide for Local Authorities on Planning for Climate Change. Available at: https://tcpa.org.uk/wp-content/uploads/2021/11/tcpartpiclimateguide_oct2021_final.pdf [Date accessed: 07/01/25]

[45] Kent County Council (2016) Kent Environment Strategy. Available at: www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf [Date accessed: 07/01/25]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
The Climate Change Risk and Impact Assessment for Kent and Medway (2020)[46]	The Climate Change Risk and Impact Assessment for Kent and Medway (CCRIA) provides a detailed assessment of the county's current and future risks, opportunities, and impacts of climate change. It provides recommendations for further action and provides evidence to inform local climate change adaption whilst raising awareness among local authorities, businesses and communities.
Kent and Medway Energy and Low Emission Strategy (2020)[47]	Document sets out how Kent and Medway will respond to the UK climate emergency. Focusing on four aims: evidence, policy and strategy, leadership, and action. The strategy has a vision of net-zero emissions by 2050 for the county of Kent; where there will be no deaths associated with poor air quality due to competitive, innovative and a resilient low carbon economy.
Medway Refreshed Climate Change Action Plan 2022[48]	An action plan to respond to climate change at a local level. This plan prioritises: • Emission reduction pathways • Planning and development • Climate emergency funding • Transport, travel and digital connectivity • Renewable energy generation • Green and blue infrastructure • Supporting low carbon business

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[46] The Climate Change Risk and Impact Assessment for Kent and Medway (2020) Available at: www.kent.gov.uk/__data/assets/pdf_file/0015/111381/CCRIA-for-Kent-and-Medway-part-one-methodology-and-summary-findings.pdf [Date accessed: 07/01/25]

[47] Kent and Medway Energy and Low Emission Strategy (2020) Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0009/112401/Kent-and-Medway-Energy-and-Low-Emissions-Strategy.pdf [Date accessed: 07/01/25]

[48] Medway Council (2023) Climate Change Action Plan. Available at: www.medway.gov.uk/climatechangeplan [Date accessed: 07/01/25]

A.4 Cultural heritage

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage
Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985)[49]	Aims for signatories to protect their architectural heritage by means of identifying monuments, buildings and sites to be protected; preventing the disfigurement, dilapidation or demolition of protected properties; providing financial support by the public authorities for maintaining and restoring the architectural heritage on its territory; and supporting scientific research for identifying and analysing the harmful effects of pollution and for defining ways and means to reduce or eradicate these effects.
Council of Europe: The Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention) (1992)[50]	The convention defines archaeological heritage and identifies measures for its protection. Aims include integrated conservation of the archaeological heritage and financing of archaeological research and conservation.
National Planning Policy Framework (2024)[51]	The NPPF includes guidance on conserving and enhancing the historic environment. It seeks to ensure local authorities plan recognise heritage assets as an irreplaceable resource and conserve them in a manner that reflects their significance. Planning authorities should take into account: • The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; • The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; and • The desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.
English Heritage and CABE: Buildings in Context: New Development in Historic Areas (2002)[52]	Aims to stimulate a high standard of design when development takes place in historically sensitive contexts by showing 15 case studies in which achievement is far above the ordinary and trying to draw some lessons both about design and about the development and planning process, particularly regarding building in sensitive locations.

[49] Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985). Available at: www.coe.int/en/web/herein-system/council-of-europe [Date accessed: 07/01/25]

[50] Council of Europe: The Convention on the Protection of Archaeological Heritage (Revised). Available at: www.coe.int/en/web/herein-system/council-of-europe [Date accessed: 07/01/25]

[51] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf [Date accessed: 07/01/25]

[52] English Heritage and CABE: Buildings in Context: New Development in Historic Areas (2002). Available at: www.designcouncil.org.uk/sites/default/files/asset/document/building-in-context-new-development-in-historic-areas.pdf [Date accessed: 07/01/25]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage
Historic England: Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment (2008)[53]	This Historic England document sets out the framework for the sustainable management of the historic environment. This is presented under the following six headline 'principles': • Principle 1: The historic environment is a shared resource • Principle 2: Everyone should be able to participate in sustaining the historic environment • Principle 3: Understanding the significance of places is vital • Principle 4: Significant places should be managed to sustain their values • Principle 5: Decisions about change must be reasonable, transparent and consistent • Principle 6: Documenting and learning from decisions is essential.
Historic England: Tall Buildings: Historic England Advice Note 4 (2015)[54]	This Historic England Advice Note updates previous guidance by Historic England and CABE, produced in 2007. It seeks to guide people involved in planning for and designing tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process. The advice is for all relevant developers, designers, local authorities and other interested parties.
Historic England (2015) The Historic Environment in Local Plans, Historic Environment Good Practice Advice in Planning: 1[55]	Practice Advice note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).
Historic England (2015) Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2[56]	The purpose of this Historic England Good Practice Advice note is to provide information in relation to assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

[53] Historic England: Conservation Principles Polices and Guidance for the Sustainable Management of the Historic Environment (2008). Available at: https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/ [Date accessed: 07/01/25]

[54] Historic England: Tall Buildings: Historic England Advice Note 4. Available at: https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/ [Date accessed: 30/12/24]

[55] Historic England (2015) The Historic Environment in Local Plans, Historic Environment Good Practice Advice in Planning: 1. Available at: https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/ [Date accessed: 30/01/24]

[56] Historic England (2015) Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2. Available at: https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/ [Date accessed: 30/12/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage
Historic England (2015) The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3[57]	This document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.
The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015)[58]	The purpose of this Historic England advice note is to support all those involved in the Local Plan site allocation process in implementing historic environment legislation, the relevant policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG). In addition to these documents, this advice should be read in conjunction with the relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.
Kent Environment Strategy[59]	Strategy that sets targets in relation to the quality of the environment. A sub-priority stated in the strategy in relation to cultural heritage, to develop heritage strategies to improve understanding and management of the historic environment.
Kent Historic Landscape Characterisation (2001)[60]	The primary aim of the Kent Historic Landscape Characterisation (HLC) project was to produce a digital map of Kent's Historic Landscape Types with associated explanatory text, that would: • enhance the formulation of development plans, structural planning programmes, development control and conservation activities. • establish a framework, in conjunction with the complimentary county-wide landscape assessment, for future Historic Landscape Assessment and research activities within Kent. A total of 87 Historic Landscape Types were defined and these were grouped into fourteen broad categories and used in the mapping.

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[57] Historic England (2015) The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3. Available at: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ [Date accessed: 30/12/24]

[58] The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015). Available at: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ [Date accessed: 30/12/24]

[59] Kent County Council (2016) Kent Environment Strategy [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf [Date accessed: 30/12/24]

[60] Croft, A.; Munby, N. and Ridley, M. (2001) Kent Historic Landscape Characterisation. Available at: https://archaeologydataservice.ac.uk/archives/view/kent_hlc_2014/index.cfm [Date accessed: 30/12/24]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage
Draft Medway Heritage Strategy (2018)[61]	The Medway Heritage Asset Review 2017 provides an overview of the historic environment in Medway, outlining its significance and identifying opportunities for further protection and enhancement. In order to make the most of these opportunities, a set of objectives have been identified that collectively form the emerging Medway Heritage Strategy: • Objective 1: Conserve and enhance Medway's heritage assets. • Objective 2: Work with Medway's heritage assets to help deliver sustainable development. • Objective 3: Increase the understanding and community involvement with Medway's heritage assets. Through the delivery of these objectives, the Medway Heritage Strategy aims to provide the framework for how we conserve, enhance and enjoy our heritage both in the immediate and long term future.

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[61] Medway Council (2018) Draft Medway Heritage Strategy 2018. Available at: www.medway.gov.uk/downloads/file/3478/draft_medway_heritage_strategy [Date accessed: 30/12/24]

A.5 Human health

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health
Healthy Lives, Healthy People: Our strategy for public health in England White Paper (2011)[62]	Sets out the government's approach to tackling threats to public health and dealing with health inequalities. It sets out an approach that will: • Protect the population from health threats – led by central government, with a strong system to the frontline; • Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing, and tackle the wider factors that influence it; • Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework; • Reflect the government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier; and • Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.
Public Health Strategy 2020-2025 (2019)[63]	The strategy sets out priorities within the public health system and areas of focus including addressing health inequalities and narrowing the 'health gap' between poor and wealthy communities, reducing rates of infectious diseases, addressing unhealthy behaviours and ensuring the potential of new technologies is realised.
Improving health and work: changing lives: The Government's Response to Dame Carol Black's Review of the health of Britain's working-age population (2008)[64]	This sets out the government's response to a review into the health of Britain's working age population conducted by Dame Carol Black. The vision is to: "*create a society where the positive links between work and health are recognised by all, where everyone aspires to a healthy and fulfilling working life and where health conditions and disabilities are not a bar to enjoying the benefits of work*". To achieve the vision three key aspirations have been identified: 1. creating new perspectives on health and work; 2. improving work and workplaces; and 3. supporting people to work. Through these three aspirations Britain's working population will fulfil their full potential, create stronger communities and help relive the financial burden of health problems on the economy.

[62] DoH (2011) Healthy Lives, Healthy People: Our strategy for public health in England White Paper Available at: www.gov.uk/government/publications/healthy-lives-healthy-people-our-strategy-for-public-health-in-england [Date accessed: 30/12/24]

[63] Public Health England (2019) PHE Strategy 2020 to 2025 www.gov.uk/government/publications/phe-strategy-2020-to-2025 [Date accessed: 30/12/24]

[64] Improving health and work: changing lives. Available at: www.gov.uk/government/publications/improving-health-and-work-changing-lives [Date accessed: 30/12/24]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health
DoH: Our health, our care, our say: a new direction for community services (2006)[65]	Puts emphasis on moving healthcare into the community and will therefore have an impact on sustainable development considerations, including supporting local economies and how people travel to healthcare facilities.
Forestry Commission: Trees and Woodlands – Nature's Health Service (2005)[66]	Provides detailed examples of how the Woodland Sector (trees, woodlands and green spaces) can significantly contribute to people's health, well-being (physical, psychological and social) and quality of life. Increasing levels of physical activity is a particular priority.
Accessible Natural Green Space Standards Towns and Cities: Review & Toolkit for Implementation (2003)[67]	Aims to help Local Authorities develop policies which acknowledge, protect and enhance the contribution natural spaces make to local sustainability. Three aspects of natural space in cities and towns are discussed: their biodiversity; their ability to cope with urban pollution; ensuring natural spaces are accessible to everyone.
Cycling and walking plan for England (2020)[68]	The 'Gear change: a bold vision for cycling and walking' document sets out a vision for a travel revolution in England's streets, towns and communities. The plan sets out the multiple benefits of increased cycling and walking including health, congestion, the economy and air quality, and the vision that "cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030". The plan sets out four main themes to achieve this vision: • Theme 1: Better streets for cycling and people; • Theme 2: Cycling at the heart of decision-making; • Theme 3: Empowering and encouraging Local Authorities; and • Theme 4: Enabling people to cycle and protecting them when they do.
Medway Rights of Way Improvement Plan 2020 to 2030[69]	The plan sets out our priorities and how the council will improve public rights of way for residents and visitors over the period of 10 years.

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[65] DoH (2006) Our health, our care, our say: a new direction for community services Available at: www.gov.uk/government/publications/our-health-our-care-our-say-a-new-direction-for-community-services [Date accessed: 30/12/24]

[66] Forestry Commission (2005) Trees and Woodlands - Nature's Health Service Available at: www.forestresearch.gov.uk/publications/trees-and-woodlands-natures-health-service/ [Date accessed: 30/12/24]

[67] Accessible Natural Green Space Standards Towns and Cities: Review & Toolkit for Implementation Available at: http://publications.naturalengland.org.uk/publication/65021 [Date accessed: 30/12/24]

[68] Department for Transport (2020) Cycling and walking plan for England. Available at: www.gov.uk/government/publications/cycling-and-walking-plan-for-england [Date accessed: 06/01/25]

[69] Medway Council (2020) Medway Rights of Way Improvement Plan 2020 to 2030. Available at: www.medway.gov.uk/downloads/file/5080/medway_rights_of_way_improvement_plan_2020_to_2030_executive_summary [Date accessed: 31/12/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health
Kent Joint Health and Wellbeing Strategy (2021)[70]	The strategy has the aim of improving health and wellbeing outcomes, deliver better coordinated quality care, improve the public's experience of integrated health and social care services, and ensure that the individual is involved and at the heart of everything. The strategy has identified four priorities: • tackle key health issues where Kent is performing worse than the England average. • tackle health inequalities • tackle gaps in provision • transform services to improve outcomes, patient experience, and value for money.
Medway Joint Health and Wellbeing Strategy 2018-2023[71]	Aims to make the lives of all people in Medway 'as full, meaningful and healthy as possible'. This will be achieved through making Medway a place where people are enabled and encouraged to look after themselves and others, services are accessible and delivered equally well across the area.
Medway Council Playing Pitch Strategy (2019)[72]	The updated Playing Pitch Strategy has been produced by Medway Council to determine whether the current supply of outdoor sports facilities within the study area is sufficient to support the current and future demands aligned to population growth, housing projections and the strategic needs of sport, health and wellbeing within Medway. This document uses the data gathered in the Needs Assessment (which accompanies this document) to present sport specific scenarios and recommendations for sports and specific sites. This is done is two ways, firstly through future scenarios which aim to address identified deficits on a macro, area wide level and secondly through a site by site action plan. The site by site action plan provides recommendations that, if implemented, would improve the quality of the sites and provision in the study area as a whole.
Medway Open Spaces Assessment[73]	Management consultancy, Knight, Kavanagh & Page (KKP), have been appointed by Medway Council to carry out an assessment on Medway's public open spaces. Public open space provides opportunities for sport and recreation, socialising, tourism and wildlife. They make an important contribution to the health and well-being of communities, ecosystems and economies. Up to date information is needed on Medway's open spaces. This is to ensure that there is suitable provision of accessible, high quality open spaces that meet the needs and aspirations of local communities, local people and people who work in or visit the area.

[70] Kent Health and Wellbeing Board Joint Health and Wellbeing Strategy (2021) Available at: www.kent.gov.uk/__data/assets/pdf_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf [Date accessed: 30/12/24]

[71] Medway Council (2022) Joint Health and Wellbeing Strategy. Available at: www.medway.gov.uk/downloads/file/3710/joint_local_health_and_wellbeing_strategy_2024_to_2028download%2Fdownloads%2Fid%2F3710%2Fjoint_health_and_wellbeing_strategy_2018_to_2023.pdf&psig=AOvVaw07xjLSnZBgFYmjeyCtAVRF&ust=1691480124396229&opi=89978449 [Date accessed: 07/01/25]

[72] Medway Council (2019) Medway Council Playing Pitch Strategy – October 2019. Available at: www.medway.gov.uk/downloads/file/4521/app_8b_medway_playing_pitch_strategy_and_action_plan_v3 [Date accessed: 30/12/24]

[73] Medway Council (2024) Medway Open Space Assessment. Available at: https://medway.oc2.uk/docfiles/20/Open%20Space%20Assessment.pdf [Date accessed: 30/12/24]

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A.6 Landscape

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to landscape
Council of Europe: European Landscape Convention (2006)[74]	Aims to promote the protection, management and planning (including active design and creation of Europe's landscapes, both rural and urban, and to foster European co-operation on landscape issues.
English Heritage and CABE: Guidance on Tall Buildings (2007)[75]	Provides advice and guidance on good practice in relation to tall buildings in the planning process and to highlight other related issues, which need to be taken into account, i.e., where tall buildings would and would not be appropriate.
National Planning Policy Framework (2024)[76]	The NPPF sates that development could seek to promote or reinforce local distinctiveness; both aesthetic considerations and connections between people and places should be considered. The NPPF also promotes the protection and enhancements of valued landscapes, giving greatest weight to National Parks and National Landscapes (Areas of Outstanding Natural Beauty).
Environmental Improvement Plan 2023[77]	The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. To enhance beauty, heritage, and engagement with the natural environment, the EIP sets out to: • Work across government to fulfil a new and ambitious commitment that everyone should live within 15 minutes walk of a green or blue space. • Continue our delivery of the England Coast Path and the Coast to Coast National Trail. • Green the Green Belt as set out in the Levelling Up White Paper by identifying key areas for nature restoration. • Invest in a new national landscapes partnership for National Parks, Areas of Outstanding Natural Beauty, and National Trails. • Extend the delivery of our Farming in Protected Landscapes programme, using lessons learned to inform future farming schemes. • Invest in active travel, with a vision for half of all journeys in towns and cities to be cycled or walked by 2030. £35 million funding has already been committed this financial year.

[74] Council of Europe: European Landscape Convention (2006) Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/236096/8413.pdf [Date accessed: 30/12/24]

[75] English Heritage and CABE: Guidance on Tall Buildings (2007) Available at: www.designcouncil.org.uk/sites/default/files/asset/document/guidance-on-tall-buildings_0.pdf [Date accessed: 30/12/24]

[76] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf [Date accessed: 30/12/24]

[77] DEFRA (2023) Environmental Improvement Plan 2023. Available at: www.gov.uk/government/publications/environmental-improvement-plan [Date accessed: 30/12/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to landscape
MHCLG: National Design Guide: Planning practice guidance for beautiful, enduring and successful places (2021)[78]	This design guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.
Natural England Green Infrastructure Framework (2023)[79]	The Green Infrastructure Framework is a commitment in the Government's 25 Year Environment Plan. It supports the greening of our towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network. The Green Infrastructure Framework comprises: • Green Infrastructure Principles: the why, what and how of good green infrastructure. • Green Infrastructure Standards: guidance on national standards for green infrastructure quantity and quality. • Green Infrastructure Maps: mapped environmental, socio-economic datasets to support the standards. • Green Infrastructure Planning and Design Guide: practical, evidence-based advice on how to design good quality green infrastructure. • Green Infrastructure Process Journeys: guides on how to apply all the products in the Green Infrastructure Framework.
Kent Downs AONB Management Plan 2021-2026[80]	As a statutory plan required by the Countryside and Rights of Way Act 2000, the Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026 sets out the shared vision of the future of this special landscape. The plan identifies the key issues, opportunities and threats facing the landscape and sets out aims and principles for the positive conservation and enhancement of the Kent Downs for a five-year period. The goal of the Management Plan is to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, valued, enhanced, and strengthened well into the future. The plan seeks to: • Conserve and enhance the natural and cultural heritage of the AONB ensuring they meet the challenges of the future; • Support the economic and social well-being of local communities in ways which contribute to the conservation and enhancement of natural beauty; and • Value, sustain and promote the benefits that AONBs provide for society including clean air and water, food, and carbon storage.

[78] MHCLG & DLUHC (2021) National design guide. Available at: www.gov.uk/government/publications/national-design-guide [Date accessed: 30/12/24]

[79] Natural England (2024) Green Infrastructure Framework. Available at: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx [Date accessed: 30/12/24]

[80] Kent Downs AONB Management Plan (2021) Available at: https://kentdowns.org.uk/wp-content/uploads/2021/11/The-Kent-Downs-AONB-Management-Plan-2021-2026-Adopted.pdf [Date accessed: 30/12/24]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to landscape
Kent Downs Landscape Character Assessment 2020[81]	The Landscape Character Assessment Update 2020 of the Kent Downs National Landscape is a component part of the statutory Kent Downs National Landscape Management Plan. It was prepared to update the previous Landscape Character Assessment (1995) in line with current best practice, to assess changes in condition of the landscape character areas; identify trends and key issues; and identify actions, investments and priorities to conserve and enhance the landscapes of the AONB (now known as National Landscape).
The Kent Design Guide (2008)[82]	The document is aimed at assisting designers and others to achieve high standards of design and constructing by promoting main principles that underlie Local Planning Authorities' criteria for the assessment of planning applications. The Design Guide promotes a sustainable approach to development, where under the Design Guide, designers are encouraged to take into consideration the arrangement of buildings and enclosures to allow easy pedestrian movement and an emphasis on 'connection' to produce social and economic benefits.
Medway Valley Strategic Landscape Enhancement Plan (2015)[83]	Contains the Vision for the Strategic Landscape Enhancement Plan (SLEP). The SLEP will use landscape as the common thread to tie together cross disciplinary aspirations and aims. It also sets out opportunities for biodiversity and water quality enhancement: • Enhance wildlife connectivity between sites. • Improve the management of woodland, hedgerows and • Trees, and improve their resilient to climate change. • Manage wetland sites and expand them where practical. • To enhance biodiversity value and flood storage capacity. • Increase the biodiversity value of rivers and streams.
Medway Landscape Character Assessment (2024)[84]	The Landscape Character Assessment provides an update to the Landscape Character Assessment undertaken by Medway Council in 2011[85]. The study focuses on rural and urban-fringe landscape and does not include urban areas, industrial developments or larger rural settlements. The study identifies eight generic landscape character types (LCTs), each representing distinct identity and common geology, topography, land use and cultural pattern. The eight LCTs have been subdivided into local landscape character areas (LCAs), including 34 LCAs.

[81] Fiona Fyfe Associates (2020) Kent Downs AONB Landscape Character Assessment Update 2020. Available at: https://kentdowns.org.uk/landscape-character-assessment-2020/ [Date accessed: 27/05/15]

[82] Kent Design Initiative (2008) The Kent Design Guide Available at: www.kent.gov.uk/__data/assets/pdf_file/0014/12092/design-guide-foreword.pdf and www.kent.gov.uk/__data/assets/pdf_file/0015/12093/design-guide-value.pdf [Date accessed: 30/12/24]

[83] Medway Valley Strategic Landscape Enhancement Plan (2015) Available at: https://www.fionafyfe.co.uk/2015/medway-valley-strategic-landscape-enhancement-plan/ [Date accessed: 28/01/25]

[84] LUC (2024) Medway Landscape Character Assessment. Available at: https://medway.oc2.uk/docfiles/20/Landscape%20Character%20Assessment.pdf [Date accessed: 28/01/25]

[85] Medway Council (2011) Medway Landscape Character Assessment, March 2011. Available at: https://www.medway.gov.uk/download/downloads/id/2340/medway_landscape_character_assessment_main_report_2011.pdf [Date accessed: 22/01/25]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to landscape
Medway Draft Green and Blue Infrastructure Framework (2021)[86]	Medway's Green and Blue Infrastructure Framework sets out Medway's strategic network of green and blue infrastructure. It provides an assessment of the needs and opportunities, strategic priorities and future actions. The framework takes a multi-functional and cross boundary approach to green infrastructure planning. Although this evidence base is presented in themes, an important aspect of green infrastructure planning is to take a multidisciplinary approach and to seek opportunities which address issues across many areas. This includes consideration of: • Biodiversity, trees and woodlands; • Access, recreation and active travel; • Health and wellbeing; • Blue infrastructure and the coast; and • Landscape character and heritage.
Draft Hoo Landscape Sensitivity & Capacity Study (2019)[87]	The Landscape Sensitivity & Capacity Study provides a review of Strategic Land Availability Assessment (SLAA) and other potential development sites for an enlarged settlement at Hoo St Werburgh. The main purpose of the study is to ensure that new development within the enlarged settlement is sited sensitively and appropriately within its landscape context. The study considers landscape character, visual amenity and landscape value. It incorporates a review of baseline data from related disciplines including public health, biodiversity, blue and green infrastructure, heritage and transport. A Landscape Sensitivity & Capacity Study is a recognised method of developing an understanding of landscape sensitivity and value; and the capacity of a landscape to absorb change. It is commonly used when planning for new and enlarged settlements. The study has identified ten land parcels within the Hoo Peninsula, and each parcel has been assessed for its sensitivity, value and capacity.

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[86] Medway Council (2021) Medway Green and Blue Infrastructure Framework: Consultation Draft 4 October 2021. Available at: https://www.medway.gov.uk/downloads/file/6279/medway_green_and_blue_infrastructure_framework [Date accessed: 17/01/25]

[87] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study – Draft. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 17/01/25]

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A.7 Population and material assets

Title of PPP	Main objectives of relevant plans, policies, and programmes in relation to population and material assets
National Planning Policy Framework (2024)[88]	The NPPF includes guidance on promoting healthy communities. The NPPF requires LPAs to aim to achieve places which promote: • Opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity. • Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and • Safe and accessible developments, containing clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas. In order to deliver the social, recreational, and cultural facilities and services the community needs, planning policies and decisions should: • Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments. • Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. • Ensure that established shops, facilities, and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and • Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
Social Exclusion Unit: Preventing Social Exclusion (2001)[89]	The primary aims are to prevent social exclusion and reintegrate people who have become excluded. Improvement is required in the areas of truancy, rough sleeping, teenage pregnancy, youth at risk and deprived neighbourhoods.
DCLG Homes for the future: more affordable, more sustainable (2007)[90]	The Housing Green Paper outlines plans for delivering homes; new ways of identifying and using land for development; more social housing- ensuring that a decent home at an affordable price is for the many; building homes more quickly; more affordable homes; and greener homes – with high environmental standards and flagship developments leading the way.

[88] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf [Date accessed: 07/01/25]

[89] Social Exclusion Unit: Preventing Social Exclusion (2001) Available at: http://www.bris.ac.uk/poverty/downloads/keyofficialdocuments/Preventing%20Social%20Exclusion.pdf [Date accessed: 07/01/25]

[90] DCLG Homes for the future: more affordable, more sustainable (2007) Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/243191/7191.pdf [Date accessed: 07/01/25]

Title of PPP	Main objectives of relevant plans, policies, and programmes in relation to population and material assets
ODPM & Home Office: Safer Places: The Planning System and Crime Prevention (2004)[91]	Practical guide to designs and layouts that may help with crime prevention and community safety, including well-defined routes, places structured so that different uses do not cause conflict, places designed to include natural surveillance and places designed with management and maintenance in mind.
Cabinet Office: Reaching Out: An Action Plan on Social Exclusion (2006)[92]	Sets out an action plan to improve the life chances of those who suffer, or may suffer in the future, from disadvantage. Guiding principles for action include: better identification and earlier intervention; systematically identifying 'what works'; promoting multi-agency working; personalisation, rights and responsibilities; and supporting achievement and managing underperformance.
Homes England strategic plan 2023 to 2028[93]	This 5-year plan spans financial year 2023 to 2024 to financial year 2027 to 2028. It outlines: • Homes England's mission • Strategic objectives and aims • how performance will be measured The plan seeks to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home, in line with the priorities of the government's Levelling Up White Paper.
EC Waste Framework Directive (1975, updated 2006)[94]	Objective is the protection of human health and the environment against harmful effects caused by the collection, transport, treatment, storage, and tipping of waste. Particular focus is placed on the re-use of recovered materials as raw materials; restricting the production of waste; promoting clean technologies; and the drawing up of waste management plans.
EC Landfill Directive (1999)[95]	Aims to prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, groundwater, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the landfilling of waste, during the whole lifecycle of the landfill.

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[91] ODPM & Home Office: Safer Places: The Planning System and Crime Prevention Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7784/147627.pdf [Date accessed: 30/12/24]

[92] Cabinet Office: Reaching Out: An Action Plan on Social Exclusion Available at: www.bristol.ac.uk/poverty/downloads/keyofficialdocuments/reaching_out_full.pdf [Date accessed: 07/01/25]

[93] Homes England (2023) Strategic Plan 2023 to 2028. Available at: www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028 [Date accessed: 30/12/24]

[94] EC Waste Framework Directive Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A31975L0442 [Date accessed: 07/01/25]

[95] EC Landfill Directive (1999) Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A31999L0031 [Date accessed: 07/01/25]

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Title of PPP	Main objectives of relevant plans, policies, and programmes in relation to population and material assets
Our waste, our resources: a strategy for England (2018)[96]	The Waste Strategy sets out how the government will: • preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy; • minimise the damage caused to our natural environment by reducing and managing waste safely and carefully; and • deal with waste crime. It combines actions to take now with firm commitments for the coming years and gives a clear longer-term policy direction in line with the 25 Year Environment Plan. The strategy promotes a more circular economy (re-use, remanufacture, repair, recycle) to keep resources in use for as long as possible.
Waste Management Plan for England (2021)[97]	The Waste Management Plan for England is an analysis of the current waste management situation in England. The plan does not introduce new policies or change how waste is managed in England. Its aim is to bring current waste management policies together under one national plan.
DECC Energy White Paper: Meeting the Energy Challenge (2007)[98]	Sets out government's long term energy policy, including requirements for cleaner, smarter energy; improved energy efficiency; reduced carbon emissions; and reliable, competitive, and affordable supplies. The White Paper sets out the UK's international and domestic energy strategy, in the shape of four policy goals: • aiming to cut CO_2 emissions by some 60% by about 2050, with real progress by 2020. • maintaining the reliability of energy supplies. • promoting competitive markets in the UK and beyond; and • ensuring every home is heated adequately and affordably.
DEFRA, Noise Policy Statement for England (NPSE) (2010)[99]	This document seeks to clarify the underlying principles and aims in existing policy documents, legislation and guidance that relate to noise. The key aims of this document are as follows: • Avoid significant adverse impacts on health and quality of life. • Mitigate and minimise adverse impacts on health and quality of life; and • Where possible, contribute to the improvement of health and quality of life.

[96] DEFRA & EA (2018) Our waste, our resources: a strategy for England. Available at: www.gov.uk/government/publications/resources-and-waste-strategy-for-england [Date accessed: 30/12/24]

[97] DEFRA (2021) Waste Management Plan for England 2021. Available at: www.gov.uk/government/publications/waste-management-plan-for-england-2021 [Date accessed: 07/01/25]

[98] DECC Energy White Paper: Meeting the Energy Challenge Available at: www.gov.uk/government/publications/meeting-the-energy-challenge-a-white-paper-on-energy [Date accessed: 07/01/2025]

[99] DEFRA (2010) Noise Policy Statement for England (NPSE) Available at: www.gov.uk/government/publications/noise-policy-statement-for-england [Date accessed: 06/01/25]

Title of PPP	Main objectives of relevant plans, policies, and programmes in relation to population and material assets
Kent Environment Strategy: A Strategy for Environment, Health and Economy (2016)[100]	Strategy that sets targets in relation to the quality and needs of the environment and economy, considering both challenges and opportunities for growth. Most notably the sustained austerity on the public sector finances with a need for a refined system that works more efficiently. Therefore, it is important to identify opportunities to deliver across outcomes, working in partnership and accessing external funding wherever possible.
Kent and Medway Growth and Infrastructure Framework (GIF) (2018 update)[101]	This document provides insight into the emerging development and infrastructure requirements that would be required to support growth across Kent and Medway. Medway have several issues: • Congestion on highway networks in town centres and arterial routes • The capacity limitations of the M2, especially in the context of the Lower Thames Crossing. • Rail capacity on the North Kent line is stretched and will shortly be overcapacity with current growth rates. • An ethically and socially diverse sub-region, with areas of prosperity and dynamic growth, but also some of the most deprived localities in the South East. • Unemployment remains above the regional average. • Healthcare provision is struggling to keep up with growth.
Medway Infrastructure Delivery Plan (IDP) (2025)	The Infrastructure Delivery Plan (IDP) will set out the required level, cost, funding and phasing of a broad range of infrastructure to support the proposed development over the plan period. It is an iterative document that is to be monitored and reviewed. The IDP identifies the interventions needed to secure relevant infrastructure to bring forward the planned developments in Medway. The IDP will also be used to address issues raised by local communities about significant pressures on infrastructure.
Medway Local Transport Plan 2011-2026[102]	This plan sets out Medway's transport strategy for the next 15 years, embracing the wider aspirations for Medway to be a City of learning, culture, tourism and enterprise at the heart of the Thames Gateway. It will prioritise addressing wiser social, economic and environmental challenges for the area, whilst taking into account emerging government policy, the developing North Kent Transport Strategy and the priorities of Medway Council and its partners.
Medway Waste Needs Assessment (WNA) (2024)[103]	The Medway Waste Needs Assessment (WNA) 2024 Update consists of an overall main report, review of strategic waste flows and five waste stream specific supporting reports which refresh the evidence base relating to projected management requirements for waste arising in Medway in 2022. The reports help underpin the proposed planning policy on waste management included in the draft new Medway Local Plan.

[100] Kent County Council (2016) Kent Environment Strategy. Available at: www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf [Date accessed: 07/01/25]

[101] Kent and Medway Growth and Infrastructure Framework (GIF) (2018 update) Available at: www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf [Date accessed: 06/01/25]

[102] Medway Council (2023) Local Transport Plan 2011-2026. Available at:www.medway.gov.uk/downloads/file/1995/local_transport_plan_2011-2026 [Date accessed: 17/01/25]

[103] BPP Consulting (2024) Medway Local Plan – Waste Evidence Base. Medway Waste Needs Assessment Update. Available at: https://medway.oc2.uk/document/20 [Date accessed: 13/06/25]

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Title of PPP	Main objectives of relevant plans, policies, and programmes in relation to population and material assets
Medway Strategic Transport Assessment (STA) (2025)[104]	The Strategic Transport Assessment (STA) has been produced to inform the preparation of the new Local Plan. It involves iterative assessments of cumulative impacts associated with committed development and future development up to 2041. The STA identifies the necessary interventions, phasing and funding of mitigations for future development, and provide for the monitoring and managing of future development. The STA has been tailored to meet the requirements of National Highways and the neighbouring Local Transport Authority, Kent County Council, to demonstrate a reasonable worst-case scenario in terms of traffic generation.
Medway Land Availability Assessment (LAA) (2025)[105]	The Land Availability Assessment (LAA) identifies a supply of sites in Medway which is suitable, available and achievable for housing and economic land up to 2041. The LAA does not determine whether a site should be allocated for development. Rather, the LAA provides information on the range of sites to meet Medway's development needs. The outputs of the LAA process have informed the SA process in terms of identification of the reasonable alternative sites for assessment.
Medway Employment Land Needs Assessment (ELNA) (2025)[106]	The ELNA was commissioned by Medway Council to inform the preparation of economic development and employment land policies in its emerging local plan (2024-41). The assessment includes a review of existing office and industrial land supply and demand. The ELNA identified that there is scope to deliver more new jobs and more economic land should the Council successfully deliver its housing need in full and look to address its commuting imbalance. With high quality land available within urban Medway, most notably at Innovation Park, and a large pipeline of industrial land awaiting development, there is scope to do so.
Medway 2035[107]	Medway 2035 sets out the regeneration aims and objectives for Medway across six priority areas. These areas include: • destination and placemaking - putting Medway on the map as a smart and sustainable city • inward investment - increasing high value businesses and expanding high quality employment • innovation - continuing to support the creation and growth of businesses • business accommodation and digital connectivity - providing the right infrastructure for business success • sector growth - enhancing a strong, mixed economy • improving employability - matching business demand and supply of skills. Medway 2035 will be accompanied by a Regeneration Delivery Plan - a framework for delivering the identified objectives, with short, medium and long term actions.

[104] Jacobs (2025) Medway Strategic Transport Assessment

[105] Medway Council (2025) Medway Local Plan 2041: Land Availability Assessment, June 2025.

[106] Rapleys (2025) Medway Employment Land Needs Assessment, February 2025

[107] Medway 2035 Available at: www.medway.gov.uk/downloads/file/3615/medway_2035 [Date accessed: 30/12/24]

A.8 Soil

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to soil
DEFRA: Safeguarding our Soils: A Strategy for England (2011)[108]	The Soil Strategy for England outlines the government's approach to safeguarding our soils for the long term. It provides a vision to guide future policy development across a range of areas and sets out the practical steps that are needed to take to prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve understanding of the threats to soil and best practice in responding to them. Key objectives of the strategy include: • Better protection for agricultural soils. • Protecting and enhancing stores of soil carbon. • Building the resilience of soils to a changing climate. • Preventing soil pollution. • Effective soil protection during construction and development; and • Dealing with our legacy of contaminated land.
DEFRA: Environmental Protection Act 1990: Part 2A. Contaminated Land Statutory Guidance (2012)[109]	This document establishes a legal framework for dealing with contaminated land in England. This document provides guidelines for how local authorities should implement the regime, including how they should go about deciding whether land is contaminated land in the legal sense of the term. Key aims are as follows: • To identify and remove unacceptable risks to human health and the environment. • To seek to ensure that contaminated land is made suitable for its current use. • To ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable, and compatible with the principles of sustainable development.
National Planning Policy Framework (2024)[110]	The NPPF states that plans should prevent development from contributing to, or being put at risk of, air or water pollution. The NPPF states that planning should protect and enhance soils, particularly those recognised as best and most versatile agricultural land (Grades 1, 2 and 3a).
Land contamination: technical guidance[111]	A collection of guidance and reports on land contamination.

[108] DEFRA (2011) Safeguarding our Soils: A Strategy for England Available at: www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england [Date accessed: 06/01/25]

[109] DEFRA (2012) Environmental Protection Act 1990: Part 2A. Contaminated Land Statutory Guidance Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/223705/pb13735cont-land-guidance.pdf [Date accessed: 06/01/25]

[110] MHCLG (2024) National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf [Date accessed: 07/01/25]

[111] Environment Agency (2024). Land contamination: technical guidance. Available at: https://www.gov.uk/government/collections/land-contamination-technical-guidance [Date accessed: 22/01/25]

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A.9 Water

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
Water Framework Directive 2000/60/EC[112]	This provides an overarching strategy, including a requirement for EU Member States to ensure that they achieve 'good ecological status' by 2015. River Basin Management Plans were defined as the key means of achieving this. They contain the main issues for the water environment and the actions we all need to take to deal with them.
HM Government Strategy for Sustainable Construction (2008)[113]	Encourages the construction industry to adopt a more sustainable approach towards development; identifies eleven themes for targeting Action, which includes conserving water resources.
DEFRA The Water Environment (Water Framework Directive) (England and Wales) Regulations (2003)[114]	Requires all inland and coastal waters to reach 'good' status by 2015. It mandates that: • Development must not cause a deterioration in status of a waterbody; and • Development must not prevent future attainment of 'good status', hence it is not acceptable to allow an impact to occur just because other impacts are causing the status of a water body to already be less than good. • This is being done by establishing a river basin district structure within which demanding environmental objectives are being set, including ecological targets for surface waters.
Environment Agency: Building a Better Environment: Our role in development and how we can help (2013)[115]	Guidance on addressing key environmental issues through the development process (focusing mainly on the issues dealt with by the Environment Agency), including managing flood risk, surface water management, use of water resources, preventing pollution.

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[112] Water Framework Directive 2000/60/EC Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060 [Date accessed: 06/01/25]

[113] HM Government Strategy for Sustainable Construction Available at: https://webarchive.nationalarchives.gov.uk/ukgwa/+/http:/www.bis.gov.uk/files/file46535.pdf [Date accessed: 06/01/25]

[114] The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003. Available at: www.legislation.gov.uk/uksi/2003/3242/contents/made [Date accessed: 06/01/25]

[115] Environment Agency (2013) Building a Better Environment: Our role in development and how we can help Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf [Date accessed: 06/01/25]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
A Green Future: Our 25 Year Plan to Improve the Environment (2018)[116]	The document sets out Government action to help achieve natural world regain and retain good health. The Plan seeks to achieve clean and plentiful water by: • Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies. • Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans. • Supporting OFWAT's ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025; and • Minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters. We will make sure that potential bathers are warned of any short-term pollution risks. The 2021 Environment Act (9th November, 2021) embeds several of these aspects into legislation.
Environment Agency (2009) Flooding in England: national Assessment of Flood Risk[117]	An assessment produced to look into areas at risk from flooding by rivers and sea and the strategy/mitigation needed to reduce the risk of future flooding.
Groundwater Protection Guides[118]	A collection of Groundwater protection guidance produced by the Environment Agency in relation to requirements, risk assessments and controls. The documents replace the Groundwater Protection: Principles and Practice (GP3).
South East Inshore Marine Plan[119]	The South East Marine Plan is one of four marine plans developed concurrently, which will mean for the first time all of English waters will have a marine plan in place. It covers an area of around 3,900 square kilometres of inshore waters between Felixstowe in Suffolk and west of Dover in Kent. The Plan introduces a strategic approach to planning within the English inshore waters between Felixstowe in Suffolk, and west of Dover in Kent. It provides a clear, evidence-based approach to inform decision-making by marine users and regulators on where, when, or how activities might take place within the south east inshore marine plan area.

[116] DEFRA (2021) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: www.gov.uk/government/publications/25-year-environment-plan [Date accessed: 06/01/25]

[117] Environment Agency (2009) Flooding in England: National Assessment of Flood Risk. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/292928/geho0609bqds-e-e.pdf [Date accessed: 06/01/25]

[118] Environment Agency (2024). Groundwater protection. Available at: https://www.gov.uk/government/collections/groundwater-protection [Date accessed: 22/01/25]

[119] South East Inshore Marine Plan (June 2021). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004493/FINAL_South_East_Marine_Plan__1_.pdf [Date accessed: 07/01/25]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
Thames River Basin District River Basin Management Plan (2022)[120]	A River Basin Management Plan (RBMP) contains the local environmental objectives for water bodies and protected areas that government, the Environment Agency, and other public bodies use to: • make planning decisions. • decide on the conditions to include in environmental permits. • target action, including informing funding decisions. • An assessment of the current condition of each water body and, if it is not in good condition, the reasons why. • Summaries of the programmes of measures, including: • the government's legal and administrative framework for protecting and improving waters in England. • current and planned programmes of improvement actions • principles to be followed when choosing future actions. • summaries at a catchment scale, including the local catchment partnership's vision and priorities for future action.
South East Water (2024) Water Resource Management Plan 2025-2075[121]	The WRMP24 sets out how water supply will be balanced and how water can be delivered reliably and efficiently. The plan explains how water will be managed in the face of a growing population and changing climate and how it can contribute to helping protect the environment.
Southern Water Drought Plan (2019)[122]	The document sets out the activities Southern Water will implement to manage the impacts of drought, based on current circumstances and existing infrastructure. The plan covers Sussex, Kent, Hampshire, and The Isle of Wight. The Drought Plan includes information on the following: • How we define a drought and the trigger levels we use to determine the status of our water resources and the corresponding activities we should be undertaking. • Customer and stakeholder communication during a drought and the consultation the company will undertake during a drought, including working with neighbouring water companies. • Demand management activities we will promote to conserve water. • Activities we will undertake to maintain or increase the amount of water available to us, and an assessment of how these could impact the environment and how we propose to monitor and mitigate this.
River Medway Catchment Flood Management Plan (2009)[123]	The Plan gives an overview of the flood risk in the Medway catchment and sets out our preferred plan for sustainable flood risk management over the next 50 to 100 years. The plan identifies flood risk management policies to assist all key decision makers in the catchment.

[120] Thames River Basin District River Basin Management Plan (2022) Available at: www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022 [Date accessed: 07/01/25]

[121] South East Water (2020) Draft South Water Resource Management Plan 2020-2080. Available at: https://cdn.southeastwater.co.uk/Publications/Water+resources+management+plan+2019/south-east-water-final-wrmp-2020-2080.pdf [Date accessed: 07/01/25]

[122] Southern Water Drought Plan (2019) Available at: www.southernwater.co.uk/about-us/our-plans/drought-plan/ [Date accessed: 06/01/25]

[123] River Medway Catchment Flood Management Plan (2009) Environment Agency. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293890/Medway_Catchment_Flood_Management_Plan.pdf [Date accessed: 06/01/25]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
Kent Environment Strategy[124]	The strategy sets the targets to reduce water use from 160 to 140 litres per person per day and ensure 28 Kent and Medway water bodies will be at good status by 2021.
Kent and Medway Shoreline Pollution Emergency Plan (2023)[125]	Objectives of this plan are to: • outline organisational responsibilities for shoreline pollution planning and response • provide emergency points of contact • determine relevant operational requirements of agencies in Kent • ensure the availability of personnel for effective co-ordination and delivery of the response • ensure that appropriate personnel are trained and exercised • ensure that liaison takes place across key partners • ensure effective planning for, and operational interventions to, pollution incidents impacting Kent's natural and built coastal environment • collate existing zonal shoreline access and sensitivity information and booming plans for Kent and Medway in one document.
Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (Environment Agency, 2019)[126]	The Medway Estuary and Swale Flood and Coastal Erosion Risk Management Strategy (MEASS) sets out the best economic, environmental and technically appropriate approach to managing flood and coastal erosion risk over the next 100 years. The Strategy assesses how to best protect people and properties, designated habitat and agricultural land over the next 100 years. It identifies the best technical solutions for flood defence, while also considering the impacts and benefits for local communities, the environment and the cost to the taxpayer. In developing MEASS, a wide range of studies have been carried out to understand the likely impacts of climate change and sea level rise over the short, medium and long-term on: • the existing flood defences; • the flood risk to communities and infrastructure; and • internationally important habitat and other land.
Medway and North Kent & Swale Abstraction Licensing Strategies	Abstraction Licensing Strategies are produced to consider the impact of abstraction at all flows. The strategies help to manage future abstraction more sustainably and outline where there may be need to reduce current rates of abstraction and the approach to time limiting licenses. Separate strategies cover the Medway and North Kent Catchment areas.

[124] Kent County Council (2016) Kent Environment Strategy [online] Available at: www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf [Date accessed: 06/01/25]

[125] Kent County Council (2023) Kent and Medway Shoreline Pollution Plan. Available at: www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/economic-regeneration-and-planning-policies/planning-policies/flooding-drainage-and-water-management-policies-and-guidance/kent-and-medway-shoreline-pollution-emergency-plan#:~:text=The%20Kent%20and%20Medway%20Shoreline,provide%20emergency%20points%20of%20contact [Date accessed: 07/01/25]

[126] Environment Agency (2019) Medway Estuary and Swale flood and coastal risk management strategy. Available at: www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy [Date accessed: 30/12/24]

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Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
Medway Strategic Flood Risk Assessment (2025)[127]	This Strategic Flood Risk Assessment (SFRA) identifies that Medway is at risk from a number of sources of flooding, with over 40km of coastline, low-lying marshland and the River Medway flowing through the area. It is therefore evident that flooding must be a key consideration for any future development within Medway. The focus of this SFRA update is to address the changes since the previous SFRA was prepared in 2020, to bring the planning context and flood risk information up to date, and to reflect changes in policy and legislation. The SFRA is also intended to aid development policies to support the emerging Local Plan. The main objectives are as follows: • To identifying the risk from each source of flooding at key locations within Medway. • Outline the requirements of the Sequential Test and Exception Test. • To state the requirements of a Flood Risk Assessment (FRA) and to provide guidance for developers on how to prepare a compliant FRA. • To state the requirements in relation to surface water drainage and provide guidance for developers on how to complete the Sustainable Drainage (SuDS) proforma. • Recommend Local Plan policies in relation to the management of flood risk. This report is supplemented by a series of mapping, which provides information required to appraise the risk of flooding and includes the location of the key watercourses and defences, as well as historic records of flooding.
Medway Council Sequential Test Report (2025)[128]	This report has been prepared to review sites considered as part of the Local Plan process to identify which sites can be allocated within lower risk areas using the Level 1 SFRA, and identify which sites located within higher risk areas could be allocated via further assessment within the Level 2 SFRA. The Level 2 SFRA will inform an evidence base for application of a detailed Exception Test at planning application stage where it is required.
Medway Council Level 2 Strategic Flood Risk Assessment (2025)[129]	The Level 2 SFRA has been prepared to accompany the Sequential Test Report. It applies Part B of the Exception Test to the sites identified within the Medway Strategic Land Availability Assessment (SLAA) preferred development option, which did not pass the Sequential Test. A high-level application of Part B of the Exception Test has been carried out for all sites within Flood Zones 2 and 3, and for sites in any Flood Zone where over 5% of the gross site area is at 'high' risk of surface water flooding, and where over 40% of the gross area is at 'medium' risk of surface water flooding. The SFRA will also be used to assist developers in undertaking site-specific application of 'Part B' of the Exception Test, and recommendations are made based on the available information at the time of preparation.

[127] Herrington (2025) Strategic Flood Risk Assessment – Medway Council. May 2025.

[128] Herrington (2025) Flood Risk Sequential Test Report – Medway Council. Draft, March 2025.

[129] Herrington (2025) Level 2 Strategic Flood Risk Assessment – Medway Council. Draft, May 2025.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
Medway Council Local Flood Risk Management Strategy 2014[130]	The strategy will look to build upon previous strategies to reduce flood risk in identified areas of risk and continue to develop an understanding of flood risk. The aims of the local strategy are to support and improve the safety and wellbeing of Kent's residents and the economy of Kent through appropriate flood risk management and to ensure that we all work together effectively to understand and deliver appropriate flood risk management in Kent.
Isle of Grain to South Foreland Shoreline Management Plan Review (2010) **Medway Estuary and Swale Shoreline Management Plan (2010)**	A Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. The SMPs promote management policies for a coastline into the 22nd century, to achieve long-term objectives, while being technically sustainable, environmentally acceptable and economically viable. It provides a high level, step by step management plan for meeting objectives with appropriate management change i.e. a 'route map' for decision makers to move from the present situation towards a more sustainable future. The boundaries of the Isle of Grain to South Foreland SMP and the Medway Estuary & Swale SMP have been established to link at the mouth of each of the Medway & Swale estuaries at the 'Schedule 4 Boundary' (Coast Protection Act 1949) where the estuary officially meets the sea. This is the common interface of the Medway Estuary & Swale and the Isle of Grain to South Foreland SMPs.

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[130] Capita Symonds & URS (2014) Medway Council Local Flood Risk Management Strategy. Final Report, July 2014. Available at: www.medway.gov.uk/downloads/file/2868/local_flood_risk_management_strategy [Date accessed: 07/01/25]

Appendix B: SA Framework

#	SA Objective	Decision making criteria: Will the option/proposal…	Indicators include (but are not limited to)
1	**Climate Change Mitigation:** Minimise Medway's contribution to climate change.	• Reduce energy consumption or GHG emissions? • Encourage renewable energy generation or the use of energy from renewable or low-carbon sources?	• Energy consumption • GHG emissions • Access to sustainable transport • Renewable energy generation • Green infrastructure (GI) with carbon sink capabilities.
2	**Climate Change Adaptation:** Plan for the anticipated impacts of climate change.	• Avoid development in areas at risk of flooding? • Reduce the risk of flooding on site or downstream? • Increase the coverage and connectivity of GI? • Incorporate nature-based solutions to flooding or measures to mitigate the impacts of coastal squeeze?	• EA flood (tidal and fluvial) map for planning • Safeguard of existing and future flood defence and protection of landward side of defences • Surface water flood risk • Number of developments given planning permission on floodplains contrary to EA advice • Presence or loss of GI (change in ecosystem services).
3	**Biodiversity and Geodiversity:** Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of Medway.	• Conserve or enhance locally, regionally, nationally and internationally designated sites? • Conserve or enhance non-designated habitats of conservation importance along with protected and priority species and areas of GI? • Identify and pursue opportunities for securing measurable net gains for biodiversity? • Protect or enhance geodiversity?	• Impacts on and opportunities to enhance European sites (SAC, SPA and Ramsar) • Impacts on and opportunities to enhance nationally designated sites and features (SSSIs, Marine Conservation Zone and ancient woodland) • Impacts on and opportunities to enhance regional and locally designated sites (LNR and LWS). • Impacts on and opportunities to enhance priority habitats and species • Creation of new biodiversity or geodiversity assets • Conservation, enhancement and provision of multifunctional GI and the wider ecological network in line with the emerging Medway Green and Blue Infrastructure Framework and the emerging Local Nature Recovery Strategy for Kent • Uplift in biodiversity units provided in new developments measured using the DEFRA Biodiversity Net Gain Metric.

#	SA Objective	Decision making criteria: Will the option/proposal…	Indicators include (but are not limited to)
4	**Landscape and Townscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	• Conserve and enhance the local landscape / townscape character? • Conserve and enhance local distinctiveness, and strengthen sense of place? • Conserve and enhance the special character of the Kent Downs AONB / National Landscape and its setting?	• Development impacts on the Kent Downs AONB / National Landscape • Loss of areas of high landscape value • Use of locally sourced materials • Discordant with Landscape Character Areas • Change to and impacts upon views • Is development in-keeping with surroundings • Alterations to the urban / rural fringe • Increase of coalescence.
5	**Pollution and Waste:** Reduce waste generation, increase the reuse and recycling of materials whilst minimising the extent and impacts of water, air and noise pollution.	• Help to minimise waste production and encourage re-use and recycling of materials? • Help to reduce or minimise air, noise or water pollution to human and ecological receptors? • Help to reduce or minimise the number of residents exposed to the risk of air, noise or water pollution? • Protect or improve water or groundwater quality?	• Number of residents in areas of poor air quality • Proximity to pollutants (e.g. busy roads) • Quality of waterways in or adjacent to sites • Local increases in road traffic or congestion • Proximity to Ground Water Source Protection Zones • Number of developments given planning permission contrary to EA advice relating to river water quality or the protection of groundwater • Proximity to AQMAs and current AQMA status • Promotion of waste reduction hierarchy • Ecological and chemical status of waterbodies.
6	**Natural Resources:** Protect, enhance and ensure the efficient use of Medway land, soils and water.	• Impact on capacity of local water resources infrastructure? • Seek to ensure an efficient use of land including use of previously developed land or existing buildings? • Help to prevent or reduce the loss of best and most versatile (BMV) land?	• Proportion of new development situated on previously developed land, in line with NPPF definitions • Use of existing buildings • Likely impacts on soil fertility, structure and erosion • Best and most versatile soils • Loss of water storage capacity within soil • Impacts on mineral areas and safeguarded minerals, wharves and railheads • Water quality of county's main watercourses • Re-use of contaminated land.

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#	SA Objective	Decision making criteria: Will the option/proposal…	Indicators include (but are not limited to)
7	**Housing:** Provide a range of housing to meet the needs of the community.	• Ensure that residents will have the opportunity to live in a home which meets their needs? • Result in the loss of, or otherwise impact on, any existing housing?	• Impacts on existing houses and estates; • Number of care homes • Deliver a mix of housing types to meet the needs of the community • Promotion of good design principles • Total number of homes planned for site.
8	**Health and Wellbeing:** Safeguard and improve the physical and mental health of residents.	• Provide residents with adequate access to necessary health facilities and services? • Encourage healthy lifestyles through improved accessibility to natural greenspaces and the PRoW / cycle network? • Improve the quality and extent of recreational assets and the GI network?	• Access to health and community services/ facilities • Percentage of plan area's population with access to a natural greenspace within 400m of their home • Local air quality • Hectares of accessible open space per 1,000 population (e.g. achievement of the Natural England Accessible Greenspace Standard) • Access to PRoW or cycle network • Reduce perception and fear of crime • Promotion of inclusive communities.
9	**Cultural Heritage:** Conserve, enhance and manage sites, features and areas of historic and cultural importance.	• Conserve and enhance heritage assets and their settings? • Conserve features of architectural or historic interest and, where necessary, encourage their regeneration and renewal?	• Number of Listed Buildings adversely impacted by development • Number of Listed Buildings partially damaged or lost • Number of archaeological sites, scheduled monuments and registered parks adversely impacted by development • Quantity of development which is discordant with the character or relevant management plans but given planning permission in Conservation Areas.
10	**Transport and Accessibility:** Improve the choice and efficiency of sustainable transport in Medway and reduce the need to travel.	• Improve travel choice, reduce journey need and shorten the length and duration of journeys? • Improve accessibility to key services and amenities for existing and new residents?	• Distance and accessibility to public transport options • Distance and accessibility to key services and amenities, as well as employment opportunities • Suitability of existing routes of access into sites, considering anticipated increases in usage.

#	SA Objective	Decision making criteria: Will the option/proposal…	Indicators include (but are not limited to)
11	**Education:** Improve education, skills and qualifications in Medway.	• Raise educational attainment levels for residents in the Plan area? • Offer residents with frequent, affordable and sustainable access to educational facilities?	• Distance and accessibility to educational facilities, including primary schools, secondary schools and further / higher level educational facilities • Local education attainment levels.
12	**Economy and Employment:** Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	• Ensure the provision of a mix of employment opportunities? • Ensure high and stable levels of employment? • Strengthen and support key retail centres?	• Access and distance to local employment opportunities • Local employment rates • Mix of employment opportunities • Inclusion of 'high added value' employment sectors • Increases or decreases in quantity of employment land in the district • Access and distance to local town centres to support retail circuits and small and independent businesses in town centres.

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Appendix C: Consultation Responses to the SA

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Table C.3.1: Consultation comments received in response to the Regulation 18 Interim SA (2024) . C5

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C.1 Overview

C.1.1 Purpose of this document

C.1.1.1 This appendix provides a summary of the consultation responses received during the Medway Local Plan (MLP) Sustainability Appraisal (SA) process to date, and how the comments received have been considered.

C.1.1.2 The SA Scoping Report for the MLP was prepared by Lepus Consulting and published for consultation alongside the high-level Regulation 18 MLP document 'Setting the Direction for Medway 2040', including with the statutory bodies (Natural England, Historic England and the Environment Agency), between 18th September and 31st October 2023. **Table C.2.1** provides a summary of the consultation responses received in relation to the SA Scoping Report, and indicates how the comments received have influenced the SA.

C.1.1.3 The Regulation 18 Interim SA Report (2024)[1] was consulted on between 15th July and 8th September 2024 alongside the Regulation 18 Draft MLP document with statutory consultees, other stakeholders and the general public. **Table C.3.1** provides a summary of the consultation responses received from the statutory consultees and other interested parties relating to the Regulation 18 SA, and also indicates how the comments received have influenced the SA.

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[1] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 26/03/25]

C.2 Scoping

Table C.2.1: *Consultation comments received from statutory consultees in response to the SA Scoping Report for the MLP (2023)*

Consultee	Summary of consultation response	Incorporation into the SA
Natural England	"*Natural England broadly supports the measures within the Sustainability Appraisal Scoping Report (dated September 2023) but have a few comments to make in relation to the decision making criteria and the associated indicators which we hope are helpful.* *For Objective 2 (Climate Change Adaptation), Natural England would support the inclusion of an indicator on nature based solutions to flooding (both coastal and surface water) and measures to mitigate the impacts of coastal squeeze.* *For Objective 3 (Biodiversity and Geodiversity), Natural England would support the inclusion of an indicator in relation to the Local Nature Recovery Strategy. We would also support the inclusion of an indicator relating to the Green Infrastructure Standard, perhaps relating to the achievement of the 'Accessible Greenspace Standard', for example.* *For Objective 4 (Landscape and Townscape), in addition to the consideration of impacts to the Kent Downs AONB, Natural England would support the indicators including a consideration of whether the scheme will conserve and enhance the AONB.* *For Objective 5 (Pollution and Water), Natural England would support the inclusion of ecological receptors within the indicators.* *For Objective 6 (Natural Resources), Natural England recommends that the indicators should reflect the 'previously developed land' definition within the NPPF and also reflect how the highest grade agricultural soils are prioritised within the consideration of potential site allocations.* *For Objective 8 (Health and Wellbeing), Natural England recommends that the indicators are updated to reflect the Accessible Greenspace Standards within the Green Infrastructure Standards."*	The SA Framework was updated to inform the Regulation 18 SA, to consider the recommendations made by Natural England, including making stronger reference to nature-based solutions, nature recovery, the National Landscape (previously known as AONB) and other ecological receptors (see latest iteration of the SA Framework in **Appendix B**).
Historic England	*"…We are content that the scoping report for Medway local plan adequately covers the issues that may arise in respect of potential effects of proposed development sites on heritage assets."*	N/A
Environment Agency	*"…We consider that the key environmental issues within our remit are generally well covered within the SA including flood risk, climate change, waste management, groundwater and contaminated land, water resources, water quality and biodiversity.*	The SA Framework has been updated to include stronger reference to water and groundwater quality (see **Appendix B**).

Consultee	Summary of consultation response	Incorporation into the SA
	…Groundwater Protection: Principles and Practice (GP3) and Guiding Principles for Land Contamination (GPLC) should be included in the Appendix table A9 … Section 10.2.24 could include specific reference to groundwater protection … the outcomes we want to see are: *• Groundwater is protected and improved for the benefit of people and the economy.* *• Future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised.* *• Local plan policies and strategies help to ensure that developing land affected by contamination won't create unacceptable risks or allow existing ones to continue.* *• Therefore, we request that table 12.1 be more specific in mentioning Groundwater in relation to water quality.* *…In paragraph 10.2.10 a standard of 125 litres per person per day is referenced however a higher standard of 110/l/p/d standard of 110 l/p/d is recommended by the Environment Agency in the National Framework for Water Resources and by DEFRA in the 2021 statement Reducing Demand for Water* *…In paragraph 10.2.12 we request the following addition: Medway Local Planning Authority is mostly supplied by Southern Water, and also South East Water near Halling towards the southwest.* *In paragraphs 10.2.14, 10.2.15 and 10.2.16 we have the following comments and would be happy to discuss further if you had any queries regarding these comments:* *• Abstraction Licensing Strategies (ALS) are strategies developed and updated by the Environment Agency for managing water resources at the local level. ALS have been produced for every river catchment area in England Wales and are due to be updated by 2027. The Local Plan Area is located within the 'Medway' catchment area. Medway abstraction licensing strategy - GOV.UK (www.gov.uk)* *• There is water available for licensing to the north of the Medway catchment area and restricted water available for most of the Medway catchment area.* *• The percentage reliability of new consumptive abstraction in the Medway ALS is available less than 30% of the time.* *…In Table A9, page A38 we suggest the reference for draft Water Resource Management Plans for both Southern Water and South East Water. In addition, on page A39, Drought Plans should reference both Southern Water and South East Water.* *…In paragraph 4.3.1, the bullet point on Water Quality should be amended to include the deterioration of water quality being prevented from any possible sources. Please also refer to water companies' Drainage and Wastewater Management Plan (DWMP) for sustainable development to avoid areas for development where there are known drainage problems.* *…We recommend the inclusion of the Thames Estuary 2100 (TE2100) Plan which sets out how the Environment Agency and our partners can work together to manage tidal flood risk in the Thames Estuary,*	The implications of development in proximity to existing coastal defences was considered in the Regulation 18 SA assessments (see site assessment methodology in **Appendix E** and latest iteration of the reasonable alternative site assessments in **Appendices F and G**). The recommendations were considered in the evaluation of the draft MLP policies at the Regulation 18 stage, and in the updated policy assessments for Regulation 19 (see **Appendix H**). Other relevant documents identified by the Environment Agency were considered whilst preparing the Regulation 18 SA. The PPP Review has been updated compared to the version presented in the SA Scoping Report to include these additional documents, and other new/updated evidence available (see **Appendix A**).

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Consultee	Summary of consultation response	Incorporation into the SA
	adapt to a changing climate and plan for the future of our riverside, today and into the next century … The Plan's requirements for Medway include future raising of all tidal flood defences, together with an ongoing programme of inspection, maintenance, repair and replacement of defences as required. Corridors of land alongside the existing defences should be safeguarded to provide space for these works."	
Kent Downs AONB Unit	Paragraph 8.2.7 states *'The southwestern and the southeastern part of the MLP area coincides with the Kent Downs AONB, north of the M20 (see Figure 8.1). Any development proposed in the MLP that lies within the AONB boundary could lead to adverse impacts on the AONB or its setting'.* We consider this should refer to land south of the M2 rather than north of the M20 and would be better phrased as follows: The southwestern and the southeastern part of the MLP area coincides with the Kent Downs AONB, north of the M20 M2 (see Figure 8.1). Any development proposed in the MLP that lies within the AONB boundary OR ITS SETTING could lead to adverse impacts on the AONB or its setting. At 8.2.5, we consider reference should be included to also considering policies against the Kent Downs AONB Landscape Character Assessment Update 2020. Table 12.1: Proposed SA Framework for the Medway Local Plan In respect of 4. *Landscape and Townscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, w*e welcome the inclusion of an Indicator for 'Development that impacts on the Kent Downs AONB' however consider that this should be widened to include consideration of impacts on AONB setting.	Baseline information as discussed in the Scoping Report has been updated to inform this Regulation 19 SA Report. With respect to landscape, this can be found in **Chapter 12** of **Volume 2**. AONB Landscape Character Assessment information has been used to inform the site assessments. The decision-making criteria for SA Objective 4 were updated at the Regulation 18 stage to take into account the recommendations (see latest iteration of the SA Framework in **Appendix B**).

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C.3 Regulation 18

Table C.3.1: *Consultation comments received in response to the Regulation 18 Interim SA (2024)*

Respondent	Summary of comments with relevance to the SA	SA response
Natural England	• Natural England emphasises the importance of following the mitigation hierarchy and highlights that a robust avoidance and mitigation strategy will be needed where there are potential impacts to designated sites, protected landscapes and areas of high biodiversity value. The Cumulative Ecological Impact Assessment at Chattenden Woods and Lodge Hill SSSI will need to be finalised to inform site selection. • SA Objective 3: Biodiversity – Recommend that where major negative impacts have been identified in the SA against, e.g. residential allocations at Cliffe and Cliffe Woods, the Hoo Peninsula and Capstone Valley, "*further consideration of ways to ensure impacts are avoided or fully mitigated is undertaken before the Regulation 19 stage".* • SA Objective 4: Landscape – Support the weighting given to the Kent Downs National Landscape in the SA. • SA Objective 5: Pollution and waste – "*it is unclear whether ecological receptors have been considered within the SA Objective 5 alongside human receptors and it would be helpful for clarity to be provided".* • SA Objective 6: Natural resources – "*where impacts to agricultural soils cannot be avoided through the Local Plan, allocations which impact lower grade soils should be prioritised*". • Natural England supports the policy recommendations within Table 9.1 of the SA and suggest further amendments: *• "The inclusion of detailed masterplans for strategic allocations to guide developments and ensure that green infrastructure corridors are fully integrated within the developments;* *• A commitment to ensuring that the Plan will work to achieve the requirements within the Green Infrastructure Standards for developments;* *• Referencing the Cumulative Ecological Impact Assessments commissioned by the Council and including their recommendations to ensure that impacts can be avoided or fully mitigated; and* *• Referencing the enhanced Section 85 of the Countryside and Rights of Way Act landscape duty in relation to the Kent Downs National Landscape".*	• Any new or updated evidence base information that has been made available by the Council has been used to inform the R19 SA and referred to in the assessments where relevant. • SA Objective 5: Pollution and Waste does include consideration of the impacts of reduced air quality on both human and ecological receptors (see the full SA Framework in **Appendix B**) however several of the receptors assessed in the R18 SA site assessments focus more on human impacts given the available evidence information. Air quality is considered in further detail within **Chapter 7** the Regulation 19 SA report. • The R19 SA Report includes an assessment of updated policies identified by Medway Council (see **Appendix H**), taking into consideration Natural England's policy recommendations.
Historic England	• Specific comments and recommendations made regarding draft policies. • "*As the Local Plan is developed, Historic England suggests any decisions should be based on a thorough understanding of the area's historic resource and a positive strategy to conserve and enhance that resource*". • No comments made on the SA.	• Comments noted and considered in the evaluation of MLP policies (**Appendix H**) and site allocation policies (**Appendix K**).

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Respondent	Summary of comments with relevance to the SA	SA response
Environment Agency	• Recommend that in considering spatial growth options (SGOs), reference is made to the Strategic Flood Risk Assessment (SFRA) and Flood Zone 3b (functional floodplain). • Recommend inclusion of Working with Natural Processes (WwNP) and/or Natural Flood Management (NFM) in the Local Plan, and ensuring alignment with the WFD. • Suggest implementing a requirement for developers to contribute to flood risk infrastructure and river enhancement in areas such as Strood, Chatham, Medway City Estate, Chatham Docks and Kingsnorth. • A number of recommendations made to specific policies, and for evidence base information that should be considered as the plan develops and referred to in the SA.	• This R19 SA Report includes an assessment of updated policies identified by Medway Council (see **Appendix H**), and ensures the Environment Agency's policy recommendations have been taken into account alongside the latest available evidence.
Dentons obo ArcelorMittal Kent Wire (AMKW)	• AMKW opposes the proposed residential-led redevelopment of the Chatham Docks site which would mean their current industrial operations need to relocate abroad, affecting local job opportunities as well as the UK's reinforced concrete supply, which is important for strategic infrastructure projects. Suggest the carbon benefits of water-based transport have been overlooked. • In relation to Policy S11: Existing employment provision, AMKW states "*The sustainability appraisal makes no reference to Chatham Docks and the conflict of the residential redevelopment in the consideration of this policy, indicating the inadequacy of its approach. The sustainability appraisal states that "the Council's criteria to ensure that redevelopment of employment sites only occurs where detrimental effects can be avoided". This is clearly not the case in relation to Chatham Docks...*" • AMKW comment that the SA is flawed, in that it does not consider the impact of the loss of current operations at Chatham Docks, and has only considered alternative sites for housing development. • "*The Sustainability Appraisal merely scores each site against a matrix with no consideration of the bigger picture – namely, the beneficial economic impact of locating housing elsewhere in order to not cause UK wide economic harm by closing ArcelorMittal Kent Wire's facility, and local economic harm from loss of skilled jobs, which in this scenario would be replaced with housing and not even speculation about different employment uses. The "identified adverse impact" in table 8.11 in relation to economy and employment identifies "loss of employment floorspace" but does not make any specific reference to Chatham Docks and reaches an apparently superficial conclusion that any adverse impact can be fully mitigated by draft policies which seek to safeguard employment areas, with no consideration of the policy conflict regarding the residential redevelopment of Chatham Docks and/or whether the alternative development contemplated could allow the current dock uses to continue, and what the economic impact of that would be.*"	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA based on the information provided by the Council. • The Chatham Docks site was assessed as a spatial delivery option (SDO) given its potential capacity of c.3,000 homes (see Appendix B of the R18 SA). The high-level SDO assessments were limited by the available data and the need to evaluate alternatives on a comparable basis; the assessments focus on evaluating broad locations with potential to make a significant contribution to meeting Medway's high housing need, and do not factor in site-specific details. • The Chatham Docks site was also assessed in the R18 SA within the strategic sites exercise under references SMI5 and SMI6 for both residential and non-residential uses. The strategic site assessments have been updated within **Appendix F** of this R19 SA to take into account the latest available evidence. Masterplan information has been used to inform the evaluation of the strategic sites where available, which in the case of the residential-led proposal, indicated that the development would also generate strategic employment opportunities.
Charles & Associates obo Attwood and Partners	• Attwood and Partners supports development in the Capstone Valley, and expresses concern that the evaluation in the SA "*results in an unduly negative assessment of the Capstone Valley SDO's contribution towards climate change mitigation*" and "*fails to recognise that a development of this scale would bring forward on-site community facilities and transport links with the surrounding areas*".	• The high-level SDO assessments focus on evaluating broad locations with potential to make a significant contribution to meeting Medway's high housing need, and do not factor in site-specific details or mitigation (see paragraph

Respondent	Summary of comments with relevance to the SA	SA response
	• Suggests that the SA places too much emphasis on proximity to existing local amenities and public transport, and fails to acknowledge that larger-scale developments can provide their own on-site facilities, such as that seen in the Lidsing site in the recently adopted Maidstone Local Plan, stating that "*A development of circa 4,000 dwellings would include on-site services: at a minimum the SDO would provide two primary schools and potentially land for a secondary school to serve the SDO and the surrounding area. Part of the SDO includes land owned by Medway Council which could provide a secondary school or employment delivery. Together with on-site retail, leisure and hospitality provision, a significant amount of potential travel for the SDO's residents would be internalised within walking distance*". • Suggests the detailed SA methodology is "*confusing and illogical*" as it does not correspond to the assessment findings for the SDOs, and that the ranking of the SDOs is overly simplistic against SA Objective 1 – climate change mitigation. • Comment that the SA is overly pessimistic with regard to climate change, suggesting that increased vehicles will not correspond to increased GHG emissions given that development within the Capstone Valley would commence in 2030 when electric vehicles will be more commonplace. Low carbon and renewable energy sources could also be incorporated which would minimise GHG emissions.	B.1.1.2). The detailed SA methodology as presented in Appendix C of the R18 SA (and updated in **Appendix E** of this R19 SA Report), as stated in paragraph C.1.1.5, relates to the strategic and non-strategic sites only. • The limitations of the ranking were declared in the R18 SA paragraph 4.1.7. Development locations which require less intervention are likely to represent more sustainable choices overall than those which will require a large amount of investment and new infrastructure to make them sustainable. • Mitigation is considered in more detail in the site assessments. Within the Capstone Valley, strategic sites LW6, HW1 and LW8 have been evaluated (see Appendix D of the R18 SA; updated in **Appendix F** of this R19 SA) and non-strategic sites including LW4, LW7, LW10, HW3, HW5, HW11 and PP1 (see Appendix E of the R18 SA; updated in **Appendix G** of this R19 SA). In the evaluation of strategic sites, masterplan information has been factored in which includes new infrastructure proposals. In the post-mitigation assessment of sites (see **Appendix I**) factors including improvements to transport infrastructure and increased uptake of low emission vehicles have been considered, leading to improved sustainability performance.
Iceni obo Barratt David Wilson Homes (BDW)	• The two growth options assessed in the SA "*are not considered to encompass all reasonable alternatives which should be assessed, nor are they sufficiently distinct. Option 2 does not assess a different level of employment land provision to Option 1 and includes only an 8.8% increase in housing numbers based on neighbouring unmet need*". Suggest that a higher buffer of between 10-12% more homes, and options for higher employment floorspace indicated in the Employment Land Need Assessment, should be considered by the Council and assessed in the SA. • Consider that the North of Strood SDO assessment is "*unduly negative, and does not take into account the ability of this option to deliver a range of housing early on in the plan period*" and question why development sites in the Hoo Peninsula have been selected when the North of Strood SDO performs better than the Hoo Peninsula SDO.	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA based on the information provided by the Council. The assessment of growth options has been updated in **Appendix D** taking into account the latest evidenced needs. • The high-level SDO assessments focus on evaluating broad locations with potential to make a significant contribution to meeting Medway's high housing need, and do not factor in site-specific details or mitigation.

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Respondent	Summary of comments with relevance to the SA	SA response
	• BDW is promoting the site 'Land North of Rede Court, Strood' (SNF1) and object to the site being rejected by Medway Council at the Regulation 18 stage, suggesting that the reasons for rejection are not justified: ○ Natural England's ALC information is not accurate, there would be potential to enhance active travel and public transport, and only one major negative impact is identified in the SA post-mitigation. A Sustainable Transport and Pedestrian Accessibility Technical Note and a Vision Document for the site have been prepared. ○ Question why this site formed part of SGO1 and SGO2, but was omitted from the preferred blended strategy under SGO3. ○ Exceptional circumstances exist to justify a review of the Green Belt boundary and release land for development. The Green Belt Appraisal suggests that the land encompassed by the site would meet the proposed new NPPF definition of Grey Belt and can deliver social and environmental benefits.	• Site SNF1 has been evaluated in the SA alongside other non-strategic reasonable alternative sites on a comparable basis using the same methodology as set out in **Appendix E**. Sites have been evaluated pre- and post-mitigation to provide transparency (see **Appendix I**). • Masterplan information / other supporting documents have not been factored into the evaluation of non-strategic sites in the SA, given the varying levels of information available across the sites and to avoid the introduction of bias.
DHA Planning obo Bellway Homes	• Bellway Homes is promoting three sites which are preferred allocations in the R18 consultation (RSE9, RSE10, RN28), and detail the land uses and range of new strategic infrastructure that can be provided alongside the housing development. • It is noted that for Site RN28 "*The supporting Interim Sustainability Appraisal identifies the Site with capacity for 74 homes, this should be uplifted to 76 accordingly. This should also be reflected in any future Local Plan policy*". • The respondent provides further details of mitigation that should be included for RSE10: ○ SA Objective 4: Landscape – drawing on details in the Landscape and Visual Technical Assessment (part of R18a representation in Miers Court Vision document) it is suggested the SA assessment should be adjusted based on this information from minor negative to negligible against AONB/National Landscapes, Landscape Character Area, and Coalescence/Urban Sprawl. ○ SA Objective 5: Pollution and Waste – the proposed masterplan layout would ensure the residential development is beyond 200m from the A2, resulting in a negligible rather than minor negative impact. ○ SA Objective 6: Natural Resources – given most sites score negatively this should not be a factor weighted against RSE10. ○ SA Objective 9: Cultural Heritage – the Site Concept Plan sites development away from the identified heritage assets which will maintain separation and minimise impacts. • "*The SA assesses Site RSE9 both on its own and as part of RSE10 based on the Strategic Sites map (SA, Figure D.1.1). Similarly, Site RN28 is included in the assessment of RSE10 and is also assessed on its own … Site RSE9 is contingent on the wider RSE10 site and is not deliverable on its own. It should therefore not be considered on its own as well, which the SA currently appears to do. This approach also risks double counting sites, which could lead to a misrepresentation in potential housing numbers, especially if this error is repeated across several sites*".	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA based on the information provided by the Council. The assessment of growth options has been updated in **Appendix D** taking into account the latest evidenced needs. The assessment of reasonable alternative sites has been updated to take into account use/capacity changes (**Appendix F** and **Appendix G**). • Site RSE10 has been evaluated in the SA as a strategic site (see Appendix D of the R18 SA, and **Appendix F** of this R19 SA), whereby additional masterplan information was factored into the appraisal. This included information provided in the documents mentioned by the respondent. • All reasonable alternative sites have been identified by Medway Council as the Plan makers and evaluated in the SA based on the red line boundary and proposal information provided. Any potential issues with double counting should be clarified with the Council.

Respondent	Summary of comments with relevance to the SA	SA response
	• Bellway Homes suggests "*the Plan period should be increased to at least 17yrs, with a requirement for at least 29,595 new homes, including the 5% buffer*" to ensure the Plan is positively prepared and sound. MBC should explore assisting Gravesham Borough Council or other authorities in meeting its housing requirement.	
Marrons obo Catesby Estates	• Catesby is promoting two sites in Allhallows (AS22 and AS18) and support their inclusion as preferred sites for allocation in the Medway Local Plan. • With regard to the growth options, "*Option 2 appears to have been rejected by the SA given the lack of information provided by Gravesham Borough Council, not necessarily on the merits of the individual options. We therefore consider the Council should more accurately assess the option to provide for unmet need, given the potential for other neighbouring authorities to also have an element of unmet need*". • Generally support the assessment of Sites AS22 and AS18 in the SA and the reasons for selection, however suggest that further improvements should be seen in the post-mitigation assessments: ○ SA Objective 3: Biodiversity – 10% biodiversity net gain not reflected in scoring in Table 8.12. ○ SA Objective 4: Landscape – settlement edges could be strengthened by the development as evidenced in the Review of Medway Landscape Character Assessment. ○ SA Objective 8: Health – significant areas of public open space to benefit the wider area, as set out in the Vision Document, are not recognised in the SA. ○ SA Objective 10: Transport – the SA acknowledges the transport benefits in paragraph D.6.6.3 but this is not reflected in the scoring in Table 8.12.	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. The assessment of growth options has been updated in **Appendix D** taking into account the latest evidenced needs. • Sites AS22 and AS18 have been evaluated alongside other reasonable alternative strategic sites in the SA (see **Appendix F**) on a comparable basis using the methodology as set out in **Appendix E**. Additional masterplan information was factored into the appraisal, including information provided in the documents mentioned by the respondent. The scoring is consistent with the approach taken to other strategic sites.
Savills obo Catesby Strategic Land	• Catesby is promoting 'Land South of Lower Rainham Road' (RN5) and object to the site being rejected by Medway Council at the Regulation 18 stage, suggesting the site can provide a new residential-led development with supporting community infrastructure. • "*Table 8.15 provides the reasons that sites have been selected or rejected by MC but the full site assessments have not been published for review as part of this consultation. The Role of the SA is to assess the sites against the SA objectives to aid the delivery of sustainable development. It is considered that the assessment within the SA steps outside of the realms of the requirements for the SA and sites should be assessed to see if they are suitable, available and achievable through the Land Availability Assessment and then through the emerging development plan…*" • Question why Growth Option 1 is identified as better performing in the SA when Table 4.1 shows similar scoring against the majority of SA Objectives. Suggest that Option 2 should be scored as minor rather than major negative against SA Objective 4 (landscape) and 6 (natural resources) as the higher housing number does not automatically mean more loss of undeveloped land. • Dispute the SA assessment of North of Rainham SDO and suggest that it should be revisited to include consideration of mitigation to overcome adverse effects on SA Objectives 6 (natural resources), 9 (cultural heritage), 10 (transport) and 11 (education).	• In line with the SEA Regulations, the SA Report provides an outline of the reasons for selection and rejection of each reasonable alternative or option considered in the Local Plan process. • Whilst the high-level SA scoring system indicates similar performance of the two growth options, the accompanying narrative provides a more thorough evaluation against each SA Objective that should be read alongside the scoring summary table (see updated growth options assessed within **Appendix D**). • The full assessment of spatial delivery options including the North of Rainham SDO is presented in Appendix B of the R18 SA. The high-level SDO assessments focus on evaluating broad locations with potential to make a significant contribution to meeting Medway's high

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Respondent	Summary of comments with relevance to the SA	SA response

	There is no justification for a major negative impact against SA Objective 4 (landscape). Question the minor negative score for SA Objective 8 (health) when it ranks highly.
	• Suggest that the reasons for rejection of Site RN5 should be revisited:
	  ○ Loss of BMV land – given the extent of high-quality land in Medway, this must be assessed against the benefits of the proposed developments. Should score minor rather than major negative against SA Objective 6 (natural resources).
	  ○ Coalescence – the site is adjacent to the river and the area does not serve an important role in separating settlements.
	  ○ Listed buildings – buffers can be provided to respond to the settings and sensitive design, layout, scale and form can avoid adverse impacts.
	  ○ Conservation area – a country park and significant woodland planting would be used to protect the Lower Twydall Conservation Area as shown on the Vision Framework. The proposed green infrastructure should also lead to a minor positive rather than negative effect against SA Objective 8 (health).
	  ○ Proximity to transport services – the Transport Technical Note details existing and potential improvements to walking, cycling and public transport. Should score minor positive rather than minor negative against SA Objective 10 (transport). This should also extent to negligible rather than major negative score for SA Objective 5 (pollution), when coupled with reduced runoff of fertilisers from current agricultural land use.
		housing need, and do not factor in site-specific details or mitigation.
		• Site RN5 has been evaluated in the SA alongside other non-strategic reasonable alternative sites on a comparable basis using the same methodology. Sites have been evaluated pre- and post-mitigation to provide transparency.
		• Masterplan information has not been factored into the evaluation of non-strategic sites in the SA, given the varying levels of information available across the sites and to avoid the introduction of bias.

Lichfields obo Church Commissioners for England (CCE)	• CCE is promoting various sites that form part of this consultation (HHH22, HHH28, HHH31, HHH35, AS11, AS13, AS14, AS16, AS21, AS19), which they consider should form part of the development strategy to ensure provision of a mix of housing types. • Suggest that too much focus on brownfield development and regeneration (as explored under SGO1) will be costly, time consuming, and will have potential to adversely affect heritage assets. Instead, CCE supports more greenfield development as proposed under SGO3 including strategic scale growth at Hoo St Werburgh. • "*CCE support Medway's conclusion in the Interim Sustainability Appraisal ('SA'), that the land to the west of Ropers Lane 'HHH22' has been 'selected' as a potential residential-led development site … conversely the adjacent land to the east of Ropers Lane 'HHH31' has been 'rejected' for the reason of 'Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking'. The difference between these two assessments is not explained or justified in the documents. Indeed, Table 6.3 in the Interim SA, which provides the 'RAG' rating summary of the impact of all sites (pre-mitigation) scores the same on all variables for HHH31 and HHH22. Land to the east of Ropers Lane was previously considered suitable as an allocation by Medway and was not considered to lead to coalescence (with what settlement is unclear – in particular given the existence of the Railway line which provides a clear physical separation barrier to the east). Land to the east of Ropers Lane would be highly accessible by foot to the proposed new transport hub, primary school, secondary school, proposed new local shops and the employment area at Kingsnorth*."	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. The reasons for selection and rejection presented in the SA are intended as outline summaries only, and have been provided by the Council. • Reasonable alternative sites have been evaluated in the SA based on the red line boundary and proposal information provided by the Council. The assessment of reasonable alternative sites has been updated to take into account use/capacity changes, where these have been confirmed by the Council (**Appendix F** and **Appendix G**).

Respondent	Summary of comments with relevance to the SA	SA response
	• State that "*it is not clear from the SA, the draft Plan or the supporting documents why the adjacent north-western parcel of HH35 (employment zone C, Appendix 3) has been discounted by Medway*". • Object to Sites AS13 and HHH28 being 'rejected', suggesting that the reasons for rejection are matters that can be overcome via a thorough masterplan approach.	
Savills obo Diocese of Rochester (DoR)	• DoR is promoting two parcels of land within its ownership, 'Land at Pilgrims Road, Halling' (CHR2) and 'Land at Vicarage Road, Halling' (CHR5) and object to the sites being rejected by Medway Council at the Regulation 18 stage. • Request that the sites should be assessed for residential use as previously promoted by Savills on behalf of the DoR, rather than non-residential use as set out in the SA. • Question the Council's selection of nearby site CHR6 as preferred for allocation in contrast to CHR2 and CHR5. Suggest that the SA and the reasons for rejection of the sites should be revisited: ○ Loss of BMV land – CHR5 is not in agricultural use and CHR2 predominantly consists of Grade 4 poor quality land. ○ Landscape character – No clear rationale in the Landscape Character Assessment as to why further development should be resisted along Pilgrims Road (CHR2). Impacts associated with CHR5 can be mitigated through design and layout. • Suggest that Green Belt release is likely to be needed to ensure the Council can meet its housing requirements, and state that CHR5 is likely to fall within the definition of 'Grey Belt' as per the revised NPPF. Development at this location can provide public open space to serve the wider area and ecological enhancements.	• Reasonable alternative sites have been evaluated in the SA based on the red line boundary and proposal information provided by the Council. The assessment of reasonable alternative sites has been updated at the R19 stage to take into account use/capacity changes, where these have been confirmed by the Council (**Appendix F** and **Appendix G**). • The two sites have been evaluated in the SA alongside other non-strategic reasonable alternative sites on a comparable basis using the same methodology. Sites have been evaluated pre- and post-mitigation to provide transparency. The assessments against SA Objective 6 (Natural Resources) are based on the provisional ALC Grades published by Natural England which show that CHR5 wholly and CHR2 partially comprise Grade 3 land.
Marrons obo Gleeson Land	• Gleeson Land is promoting the site 'Land east of Buckland Road' (SR6) and object to the site being rejected by Medway Council at the Regulation 18 stage, suggesting it has no overriding constraints and can contribute towards meeting housing needs. • Question the Council's conclusion regarding housing growth options, stating "*there would be a beneficial effect of delivering more homes, not just for Medway but for the region (i.e. Gravesham) as a whole. This needs to be balanced against the harm which would arise in respect of landscape / townscape and natural resources, which in both cases is noted to be only marginally worse. We consider this needs to be explored further, including identifying potential sites to accommodate the additional housing requirement, before it can be adequately discounted as a reasonable alternative*". • Question the Council's selection of nearby site SR51 as preferred for allocation in contrast to SR6. Suggest that the SA and the reasons for rejection of Site SR6 should be revisited: ○ Proximity to SSSI – 100m buffer can be provided to separate built development from the SSSI, informed by ongoing ecological surveys. ○ Loss of BMV land – should not preclude development, given recent appeals for other sites in the area suggesting the benefit of housing outweighs the insignificant loss of land, and other selected sites will result in similar losses.	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA. The assessment of growth options has been updated in **Appendix D** taking into account the latest evidenced needs. • Site SR6 has been evaluated in the SA alongside other non-strategic reasonable alternative sites on a comparable basis using the same methodology, as set out in **Appendix E**. The scoring is consistent with the approach taken to other sites. For relevant receptors, such as access to bus services and GP surgeries, the assessment considers the proportion of each site within recommended sustainable target distances, and negative scores are recorded where the majority of the site area lies outside of this distance.

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Respondent	Summary of comments with relevance to the SA	SA response
	○ Coalescence – a significant gap will remain, alongside intervening vegetation. ○ Walking distance to public transport – the site will provide access to local amenities and bus stop in Cliffe.	• Development at the site is likely to contribute towards reduced separation of settlements (i.e. coalescence) even if the site is relatively small.
David Lock Associates obo Hallam Land in partnership with Tarmac and Aggregate Industries	• Hallam Land is promoting redevelopment of the Holborough Quarry site (CHR4) and object to the site being rejected by Medway Council at the Regulation 18 stage, suggesting it represents a significant opportunity to deliver a cross-boundary community to contribute towards housing needs of Medway and the wider HMA. • Express concerns that the spatial strategy relies too heavily on urban regeneration sites that may be challenging to deliver. Recommend that a Green Belt assessment is undertaken to consider whether exceptional circumstances exist to warrant release for development, including any 'Grey Belt'. • Suggest that the assessment of growth options in the SA needs to be reconsidered, stating that "*the decision to discount Option 2 at this stage is premature and inconsistent with the NPPF"* given that Gravesham's unmet need is known, and furthermore the proposed reforms to the NPPF place more focus on the need for cross-boundary strategic planning. Growth Option 2 should perform better than Option 1 against SA Objective 12 (Economy and Employment) as the higher population growth will increase local spending and attract economic investment to alleviate pressures associated with out-commuting. More social and physical infrastructure could be provided under Option 2 leading to benefits for SA Objectives 8 (Health and Wellbeing), 10 (Transport and Accessibility) and 11 (Education). • Question how the SA has been used to inform site selection, when the Hoo Peninsula SDO ranks lowest, but the Council have selected SGO3 that includes 5 strategic sites within this same area. Suggest that the Medway Valley SDO performs better than the Hoo Peninsula SDO but has been overlooked by the Council. A fourth SGO is recommended that will include strategic cross-boundary development. • Broadly agree with the SA assessment of the strategic site CHR4 however suggest that the post-mitigation assessment needs to be revisited: ○ SA Objective 6: Natural Resources – The site's history of working as a former quarry means it has limited greenfield value and should be adjusted from major to minor negative. ○ SA Objective 8: Health and Wellbeing – should be adjusted from minor negative to minor positive, given likely new health facilities. ○ SA Objective 9: Cultural Heritage – should be adjusted from negligible to minor positive given new positive cultural and industrial heritage interpretation that can be provided through the redevelopment. ○ SA Objective 11: Education – should be adjusted from negligible to minor positive, given likely new education facilities.	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA. The assessment of growth options has been updated in **Appendix D** taking into account the latest evidenced needs. • The limitations of the high-level assessment of growth options are declared in the R18 SA Report. Opportunities for new infrastructure and investment under Option 2 were acknowledged, for example with respect to education in paragraph 3.2.26. • In accordance with the NPPF definition of previously developed land, this "*excludes … land that has been developed for minerals extraction … and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape*". Irrespective of this, aerial photography indicates the portion of the site that lies within Medway, as assessed in the SA, largely comprises agricultural land and so the evaluation against SA Objective 6 remains valid. • Available masterplan information was used to inform the assessment of strategic sites in the SA, however this did not include indication of new healthcare services for Site CHR4. • Site CHR4 was identified to have a major positive impact on SA Objective 11 as shown in Table D.12.1 of the R18 SA. Updated strategic site assessments and corrected summary scoring, taking into account the latest evidence and site information provided by the Council, can be found in **Appendix F** and **Appendix I** of this R19 SA Report.
WSP obo Homes England	• Homes England is promoting the 'Riverside Site' and 'Brunel Site' (CCB25 and CCB35) as residential-led mixed use sites and supports their inclusion in the Medway Local Plan	• All reasonable alternatives and options have been identified by Medway Council as the Plan

Respondent	Summary of comments with relevance to the SA	SA response
	for this use as opposed to non-residential uses as currently stated. Request that the sites are re-assessed in the SA for residential development: ○ Air quality – negligible effect. ○ Ecology and BNG – presence of open mosaic habitat of local importance not considered to be an overriding constraint and habitats can be recreated. ○ Accessibility – within walking and cycling distance of schools and shops and close to public transport. ○ Heritage – design and layout will take account of the Chatham Historic Dockyard Conservation Area. ○ Flood risk – the site benefits from existing flood defences and mitigation can be provided e.g. height of ground floor levels. • Homes England is also promoting the Lodge Hill Camp site (HHH1) and object to the site being rejected by Medway Council at the Regulation 18 stage, suggesting it is a sustainable and deliverable site that can contribute towards meeting housing needs. Request that the SA assessment and reasons for rejection are revisited: ○ SSSI and ancient woodland – not within SSSI and sympathetic design can minimise impacts. ○ Loss of BMV land – the site is brownfield and no potential for agricultural use. ○ Coalescence – site has clear boundaries and includes existing buildings and hardstanding that can be re-used or replaced. ○ Beyond walking distance to public transport – not a significant distance from bus stops and services can be extended. • Homes England is promoting Chattenden Barracks site (HHH3) and support the inclusion of this site in the Medway Local Plan and the SA, emphasising that this site can provide a sustainable and deliverable brownfield residential-led development. With reference to the site area stated in the SA of 25.34ha "*Homes England reserves the opportunity to amend this overall site area as the scheme develops in discussion with Officers and the extent of proposed development area is confirmed*".	makers and evaluated in the SA based on the information provided by the Council. • The assessment of reasonable alternative sites has been updated to take into account use/capacity changes confirmed by the Council (**Appendix F** and **Appendix G**). This includes CCB25 changed use to residential led. • Site HHH1 has been evaluated in the SA alongside other non-strategic reasonable alternative sites on a comparable basis using the same methodology. Although the site contains some existing development, it would not meet the NPPF definition of a previously developed site given there are undeveloped areas; this is reflected in the SA assessments. The site lies directly adjacent on all sides to the SSSI, and development will have potential to lead to significant adverse effects. Mitigation such as the potential for expanded bus routes was considered in the R18 SA within Chapter 8 (see latest post-mitigation site assessments in **Appendix I** of this R19 SA).
Urban Vision Enterprise obo Hoo St Werburgh Parish Council and Chattenden Parish Council (HSW&C)	• HSW&C strongly objects to the housing growth proposed within the parish, stating that none of the spatial growth options would provide sustainable options, and suggest that the preferred sites for allocation contradict with the Local Plan's proposed vision. • "*Disproportionate growth is proposed for one Parish, causing very substantial harm in terms of climate change mitigation, biodiversity and geodiversity, landscape and townscape, pollution and waste, natural resources, health and wellbeing, cultural heritage, transport and accessibility (as confirmed in the Sustainability Appraisal).* • *There would be substantial loss of high-grade agricultural land, causing substantial harm to the rural economy and food production capacity, in addition to substantial harm to the rural and natural environment, sensitive landscapes, habitats and biodiversity, all contrary to national policy.* • *Transport infrastructure is already over-capacity, and the proposed site allocation would result in further congestion, gridlock and associated deterioration of air quality.*	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. • The Hoo Peninsula forms a spatial delivery option (SDO) evaluated in the SA (see Appendix B of the R18 Interim SA). A minor positive impact was identified on SA Objective 12: Economy owing to the location of existing major employment locations within a sustainable distance; details regarding transport capacity are not factored into this high-level assessment

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Respondent	Summary of comments with relevance to the SA	SA response
	• *Due to transport capacity, the proposed housing site allocations would cause substantial harm to the viability of Kingsnorth, a strategically important employment site, harming the economy of the Parish and the wider Medway economy.* • *Water and energy infrastructure are already unable of insufficient capacity, so a substantial increase in housing proposed is unrealistic and undeliverable*." • Largely agree with the SA assessments of sites on the Hoo Peninsula however "*The Sustainability Appraisal scores Hoo positively in terms of impacts on economy and employment, but this has failed to take account of the lack of transport capacity and negative impact of the proposed housing site allocations on the viability of Kingsnorth*".	(although note major negative impacts were recorded against SA Objective 10: Transport and accessibility). • The methodology for assessment against SA Objective 12 for strategic and non-strategic sites is set out in **Appendix E**, indicating the limited information available to inform evaluation within this objective.
Bloomfields obo Kitesfield Estates	• Kitesfield Estates is promoting the site 'The Depot, Ratcliffe Highway, Hoo St Werburgh, Rochester' (HHH41) and support the inclusion of this site in the Medway Local Plan. • The proposed spatial strategy (SGO3) is supported, allowing for a 'brownfield first' focus. However, recommend policies are refined to ensure clarity for developers of smaller sites and provide quantifiable criteria, and suggest that affordable housing requirements should remain at 10% for rural brownfield sites given viability concerns. • Broadly support the findings of the SA but suggest the site should score more highly against biodiversity and geodiversity, landscape and townscape, and pollution and waste. The site comprises a small area of brownfield land with limited biodiversity value, and is screened by a band of hedging and vegetation. Redevelopment of the site will allow for biodiversity enhancements and green infrastructure to connect the site to adjoining sites and the wider countryside, as evidenced by the Development Framework and joint masterplanning approach with an adjacent site.	• Site HHH41 has been evaluated in the SA alongside other non-strategic reasonable alternative sites on a comparable basis using the same methodology. The scoring is consistent with the approach taken to other sites. • Masterplan information has not been factored into the evaluation of non-strategic sites in the SA, given the varying levels of information available across the sites and to avoid the introduction of bias. Irrespective of this information, Site HHH41 has been selected as a preferred site for allocation by the Council.
LEP Planning obo Mr and Mrs Kemsley	• Mr and Mrs Kemsley are landowners promoting the site 'Land adjacent to Farm Cottages, Lodge Hill Lane, Chattenden' (HHH40) and object to the site being rejected by Medway Council at the Regulation 18 stage, suggesting it is an available, achievable and deliverable site that can contribute towards meeting housing needs. • Broadly agree with the Council's preferred spatial strategy (SGO3) and evaluation in the SA, given the need to balance urban and rural growth. • Question the Council's selection of nearby sites HHH3 and HHH6 as preferred for allocation, when they are much larger than HHH40. • Do not dispute the pre-mitigation assessment of Site HHH40 in the SA, but state in relation to the post-mitigation assessment "*we consider greater review of the Site's potential can be undertaken, namely around the opportunities for improvement in heritage terms, and in ecological terms*". A Concept Masterplan has been prepared indicating "*a development area incorporating extensive biodiversity net gain opportunities and open space … well-contained residential led scheme … in keeping with, and at a scale proportionate to, the size and form of the existing settlement…"* • The Council's reasons for rejection at this stage relate to the site's proximity to the SSSI, loss of BMV land, potential for coalescence, and walking distance to public transport which can be overcome through mitigation as evidenced in the Concept Masterplan.	• Site HHH40 has been evaluated in the SA alongside other non-strategic reasonable alternative sites on a comparable basis using the same methodology. Sites have been evaluated pre- and post-mitigation to provide transparency. • Masterplan information has not been factored into the evaluation of non-strategic sites in the SA, given the varying levels of information available across the sites and to avoid the introduction of bias. • The SA assessment findings have been fed back to Medway Council to aid their decision making. The outline summary of the Council's preliminary selection/rejection of sites was provided in Chapter 8 of the R18 SA. The Council's latest information regarding selection/rejection of sites can be found in **Appendix J** of this R19 SA.

Respondent	Summary of comments with relevance to the SA	SA response
DHA Planning obo Persimmon Homes and Taylor Wimpey	• Persimmon Homes and Taylor Wimpey are promoting Site 'Mill Hill, Gillingham' (RN1), and object to the site being rejected by Medway Council at the Regulation 18 stage, suggesting it is a sustainable and deliverable site that can contribute towards meeting housing needs. • Recommend that the vision and strategic objectives of the Plan are amended to place more focus on delivering housing to meet needs. Suggest reliance on windfall development is too high and the plan period needs to be extended until at least 2042. • The respondent provides further information regarding the SA assessment of Site RN1: ○ SA Objective 2: Climate Change Adaptation – the development area can be located outside of areas at risk of flooding, and the scoring should be adjusted from major negative to negligible. ○ SA Objective 3: Biodiversity and Geodiversity – the site lies outside of the Medway Estuary and Marshes SPA area and so should be amended from major negative to minor negative. ○ SA Objective 4: Landscape – the SA "*fails to take into account as part of its assessment the overall scale of the development and therefore its likely impact*" given that Site RN1 scores similarly to LW8. The contribution the site makes to overall character and quality of the Landscape Character Area is limited and mitigation such as reinforcement of boundary features can be included. The site is not visible from public rights of way, and whilst there are views from neighbouring properties these views are low quality. Given the site at its widest point is 203m, and the site is already contained by existing urban features, the site would not result in actual or perceived coalescence. ○ SA Objective 5: Pollution – suggest that the 100-home threshold for major negative effects is too low and object that the assessment does not take into account mitigating factors such as electric cars. • It is noted that Site RN1 has been rejected due to loss of BMV soil, coalescence and beyond reasonable walking distance to public transport. The respondent suggests these reasons are not justified given the small site area, and notes an adjacent bus stop on Lower Rainham Road that could be expanded from its current school services to provide other services.	• All non-strategic sites identified by Medway Council and evaluated in the SA, including Site RN1, have been assessed on a comparable basis using the same methodology, with the assessment findings pre-mitigation presented in Appendix E of the R18 Interim SA (and updated in **Appendix G** of this R19 SA). • The methodology as set out in **Appendix E** addresses several of the points raised by the respondent and explains what information has been used to assess sites, and declares limitations and uncertainties where relevant. ○ The site lies within 400m of a European site where development has potential to lead to a major negative effect (see **Box E.4.1** and notes). ○ A precautionary approach is taken in the assessment of impacts against landscape receptors, in the absence of site-specific assessment details (see **Chapter E.5**). ○ Development at the site is likely to contribute towards reduced separation of settlements (i.e. coalescence), and contribute towards cumulative loss of agricultural land (wholly Grade 1 ALC) even if the site is relatively small. • Mitigation is discussed within Chapter 8 of the R18 SA (and updated in **Appendix I** of this R19 SA), with post-mitigation assessments of each site including RN1, which demonstrated that many of the adverse effects identified in the baseline assessments are likely to be reduced or mitigated through application of emerging local plan policies, including against several of the receptors mentioned by the respondent.
SME Developer Network	• The SME Network feels that the Regulation 18 consultation lacks supporting evidence base information to underpin the preferred strategy, allocations and infrastructure, including why certain urban and/or rural sites were allocated or rejected. • The SA "*provides some clarification on sites that have been selected or rejected for allocation. However, it appears that no assessment has been undertaken to understand*	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making. Selection and rejection information for

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Respondent	Summary of comments with relevance to the SA	SA response
	the potential development yields of the selected sites nor on what policy basis these sites are deemed more appropriate over others … we would expect to see a housing topic paper which clearly identifies the site selection criteria of the sites selected". • Medway has a significant employment floorspace requirement yet seeks to allocate residential uses within high density employment areas such as the Medway City Estate and St Mary's Island. It is uncertain whether the Local Plan will lead to a net decrease or increase of employment floorspace. • Question whether the housing need can be met, suggesting that a number of preferred sites for allocation are not suitable/viable as supporting infrastructure is not present, windfall allowance is too high, and new 10% BNG requirement will mean lower yields. • Recommend that the Council amends the Plan period is extended to ensure sufficient time to address strategic matters such as the LTC, and changes to government planning policy, which may lead to delays in adoption beyond 2025. This would result in a higher housing need to be planned for. • Smaller sites may be discounted too early in the LAA / SA process when they can in fact contribute towards the required 10% of housing target to be made up of small sites on 1ha or less.	reasonable alternative sites was set out in Chapter 8 of the R18 SA, to provide the Council's outline reasons for identification of the preferred sites at that stage. Updated selection/rejection information for the R19 stage is set out in **Appendix J**. • The indicative yields of all spatial growth options, spatial delivery options, and reasonable alternative sites evaluated in the SA have been provided by Medway Council drawing on the latest LAA information. The assessment of reasonable alternative sites has been updated to take into account use/capacity changes confirmed by the Council (**Appendix F** and **Appendix G**).
Tonbridge & Malling Borough Council (TMBC)	• Clarification is sought on the base date of the Plan and the identified housing, Gypsy and Traveller, and employment needs over the Plan period and whether these can be met. TMBC questions the potential impact on revised housing numbers from the publication of the revised NPPF, and whether the 2,000 home contribution to Gravesham's unmet housing need can be accommodated. • "*It is not clear from the Sustainability Appraisal what, if any, reasonable alternative policy approaches e.g. levels of affordable housing have been considered during plan preparation."*	• It is possible to derive reasonable alternatives for different aspects of a local plan. There is no prescribed formula or procedure about which aspects of a local plan require reasonable alternatives. Medway Council has identified several different types of reasonable alternative during the preparation of the Plan to date. • Draft policies prepared by the Council were evaluated in the R18 SA (see Appendix F). This R19 SA Report includes an assessment of new / updated policies identified by the Council (see **Appendix H**). • All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA based on the information provided by the Council. The assessment of growth options has been updated in **Appendix D** taking into account the latest evidenced needs.
Iceni Projects (Mr Simon Fowler)	<u>SUMMARY FROM COUNCIL</u>: • Our comments are included in the representation on behalf of Berengrave Lane 2 Ltd dated September 2024. We have significant concerns that the impacts of Site RN17 are unduly balanced in the wider geography of the North Rainham SDO, and consequently the assessment criteria result in a substantially more negative outcome for the Site. Site	• Site RN17 lies within the geographic area covered by the North of Rainham SDO (see Appendix B of the R18 Interim SA Report). The high-level SDO assessments focus on evaluating broad locations with potential to make a

Respondent	Summary of comments with relevance to the SA	SA response
	RN17 is materially different from other potential sites within the North Rainham SDO. The methodology of the 12 ISA criteria used fails to consider the site specifics, and the generalisations unreasonably conclude would perform worse in sustainability terms than the reality of the development potential.	significant contribution to meeting Medway's high housing need, and do not factor in site-specific details. • Site RN17 has also been evaluated as an individual site for residential-led development as part of the reasonable alternative non-strategic site assessments (see Appendix E of the R18 Interim SA Report; updated within **Appendix G** of this R19 SA). • Mitigation is discussed within Chapter 8 of the R18 SA (updated within **Appendix I** of this R19 SA), with post-mitigation assessments of each site including RN17 provided which is likely to lead to improved sustainability performance. All non-strategic sites have been evaluated on a comparable basis using the same methodology (see **Appendix E**). • All SA assessment findings, including for SDOs and sites, were fed back to Medway Council to aid their decision making, including the selection/rejection of sites.
Pinnacle Planning obo Richborough	• Richborough is promoting Site 'Land off Lower Rochester Road' (SR17), and object to it being rejected by the Council at the Regulation 18 stage, suggesting it is an available, suitable and sustainable site that can contribute towards meeting housing needs. • Suggest that additional housing growth options should be tested in the SA, including potentially assisting Tonbridge and Malling in meeting their needs. Consider that a higher figure above the new standard method calculation should be sought, in light of historic under-delivery and other viability concerns. The SA "*fails to consider the wider context of the area or adequately factor in the social and economic implications*". • The promoted site SR17 lies within the North of Strood SDO. Richborough questions the performance of this SDO especially when compared to the Hoo Peninsula SDO and Capstone Valley SDO. • "*It is unclear how the previous assessment of SDOs has informed identification of sites that make up the various SGOs. It is also unclear how the Blended Strategy (SGO3) has been established and specifically how sites have been selected from SGO1 and SGO2 and carried through into SGO3*". • Question the reasons for rejection of SR17 relating to loss of BMV land, potential for coalescence, effects on listed building, and location beyond reasonable walking distance to public transport, when other selected sites seem to have potential for similar adverse effects.	• All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. The assessment of growth options has been updated in **Appendix D** taking into account the latest evidenced needs. • The SA Framework (**Appendix B**) illustrates the range of sustainability topics considered in the SA including social, economic and environmental factors. • Site SR17 has been assessed alongside other strategic sites based on the same methodology. The site was identified to have a major positive impact on SA Objective 12 as shown in Table 6.3 and Table 8.12 in the R18 SA main report, and as explained in paragraph D.13.2.3. Updated strategic site assessments and corrected summary scoring, taking into account

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Respondent	Summary of comments with relevance to the SA	SA response
	• "*The proposed employment benefits (as referenced in the LAA) for Site SR17 are the same as Hoo sites HHH6, HHH12 and HHH22, yet Table D.13.1 of the ISA scores Site SR17 as 'minor positive' and the other Hoo sites listed above as 'major positive'. This should be rectified so the scoring is the same across all sites*".	the latest evidence and site information provided by the Council, can be found in **Appendix F** and **Appendix I** of this R19 SA Report.
Parker Dann obo Brookworth Homes	• Brookworth Homes is promoting Site 'Land North of Brompton Farm Road, Strood' (SR5) and object to it being rejected by the Council at the Regulation 18 stage, suggesting that it performs better than other preferred sites, including those on the Hoo Peninsula that are shown to be more sensitive in the SA and HRA. • Question the Plan period of 2025-2041 stated in the SA and suggest it should be from 2023 covering 18 years. The housing numbers assessed in the SA should account for the full period and include windfall allowance or existing commitments. "*The SA has not assessed an option to meet the full LHN of 29,844 or 31,336 new homes with 5% buffer. Of the two options assessed they are not sufficiently distinct to result in meaningful comparison*." Disagree that Option 1 performs better, suggesting that the benefits of contributing to Gravesham's unmet need under Option 2 should be explained including benefits to the labour pool and low delivery of affordable homes. • Question selection of SGO3 'blended strategy' that contains partial SDOs. "*No partial SDOs are identified either spatially or through indicative yields and there is no standalone assessment of the partial SDOs that make up the SGOs … each of the SGOs has different spatial variations of partial SDOs*." • Disagree with the evaluation of SGO3 in the SA, for example that it does not reflect major negative effects against biodiversity as shown in the Hoo Peninsula SDO assessment although it contains the majority of the SDO, including areas within 400m of the Chattenden Woods and Lodge Hill SSSI. Suggest "*To be justified the 'Blended Strategy' should revisit the exclusion of the 'North of Strood (partial)' SDO and reexamine the case for Green Belt release*". • State there is a lack of "*transparency, consistency and rationality*" in the reasons for selection and rejection of development sites as presented in the SA.	• All reasonable alternatives have been identified by Medway Council as the Plan makers. The Plan period and identified housing needs stated in the SA are based on information provided by the Council. The assessment of growth options has been updated in **Appendix D** taking into account the latest evidenced needs. • Each reasonable alternative has been evaluated relative to other alternatives of the same type (see **Figure 5.1** in the R19 SA Main Report). The SDOs are higher level and broader scale than the SGOs, which in turn are higher level than development sites, and this is reflected in differences in scoring across these different levels that are not intended to be compared directly. • The SDO evaluation in the SA demonstrates how the Council has explored different broad locations for growth that can be combined in different ways to form spatial strategy options (i.e. the SGOs); the Council has identified which combinations or parts of SDOs could reasonably be grouped to form spatial options, drawing on the SA findings and other evidence base information. • Selection and rejection information for reasonable alternative sites was set out in Chapter 8 of the R18 SA, to provide the Council's outline reasons for identification of the preferred sites at that stage. Updated selection and rejection information is provided in **Appendix J** of this R19 SA Report.

Appendix D: Assessment of Additional Growth Options

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D.1 Introduction

D.1.1 Overview

D.1.1.1 The purpose of this appendix is to provide an assessment of growth options identified by Medway Council, including two new options identified since the Regulation 18 Interim SA stage (2024)[1].

D.1.1.2 The options have been identified to facilitate testing of reasonable alternatives for the total number of new houses and employment land to be delivered during the Plan period.

D.1.1.3 The evaluation of additional options has been carried out in a consistent manner drawing on the assessment of options from the previous SA stage.

D.1.2 Limitations

D.1.2.1 Environmental assessment needs to have details of size, nature and location in order for impacts to be understood in relation to the environmental baseline. The housing numbers have only 'nature', in this case housing. The size and location details are not present which means that any attempt to evaluate impacts in a meaningful way is necessarily very high level. The housing number descriptions lack spatial prescription beyond the principles promoted by the NPPF to pursue brownfield first. Whilst size is implied by the total number of houses associated with each option, the distribution by size and location is missing and consequently the SA process is only able to engage at a very high level with restricted diagnostic conclusions.

D.1.2.2 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by Medway Council, as well as expert judgement.

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[1] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 13/06/25]

D.2 Assessment of Growth Options

D.2.1 Overview

D.2.1.1 The Regulation 18 Interim SA Report (2024)[2] included an appraisal of two options for the overall quantum of residential and employment growth to be delivered through the emerging Medway Local Plan (MLP).

D.2.1.2 These options were identified with consideration of the available evidence at the Regulation 18 stage of the Plan making process, as well as the environmental constraints which limit the extent of growth that is appropriate for the area. The two options were based on the latest evidenced needs for the Plan area at the time, and the potential unmet housing needs of the neighbouring authority of Gravesham, noting that these unmet needs were not yet confirmed given Gravesham Borough Council's in-progress Local Plan Partial Review[3].

D.2.1.3 The two options are reproduced in **Table D.2.1**.

Table D.2.1: *Growth Options considered within the Interim SA Report (2024)*

Growth option	Description of growth option
Option 1	Meet Medway's Local Housing Need and Initial Objective Assessment of Employment Land Need (based on evidence at Regulation 18 stage). **Approximately 22,643 homes and 274,663m^2 employment land.**
Option 2	As for Option 1, plus meeting Gravesham's Unmet Housing Need. Initial consultation and duty to cooperate meetings with Gravesham Borough Council have identified a potential unmet housing need of 2,000 homes. **Approximately 24,643 homes and 274,663m^2 employment land.**

D.2.1.4 The Regulation 18 consultation closed in September 2024. A new version of the NPPF was published in December 2024, alongside updated PPG. New housing figures were published, derived through the Standard Method, that sought to meet the government's aspirational target of building 1.5 million homes during this parliamentary term.

D.2.1.5 The latest Standard Method calculation for Medway is 1,636 dwellings per annum[4]. Across the proposed 15-year Plan period, this equates to a total housing need of 24,540 dwellings. In terms of employment needs, the 2025 Employment Land Needs Assessment (ELNA) identified a need for a minimum of 204,000 sqm of industrial floorspace and 36,500 sqm of office floorspace (totalling 240,500 sqm).

D.2.1.6 At the time of writing, Gravesham Borough Council's local plan evidence base is still in preparation and there has been no formal confirmation on the existence, or extent, of any unmet housing need. However, Medway Council's position remains that an approximate

[2] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 13/06/25]

[3] Gravesham Borough Council (2024) Planning Policy News: Gravesham Local Plan Partial Review. Available at: https://www.gravesham.gov.uk/planning-regeneration/consultations-news/3 [Date accessed: 13/06/25]

[4] Turley (2025) The standard method of assessing housing need. Available at: https://www.turley.co.uk/sites/default/files/pdf/file/2025-05/turley_lpdf_-_revised_standard_method_analysis_may2025_0.pdf [Date accessed: 13/06/25]

2,000 home contribution to Gravesham's unmet needs via DtC is considered a reasonable alternative housing number.

D.2.1.7 **Table D.2.2** presents two further reasonable alternative growth options which have been identified by Medway Council in response to the change in Standard Method housing number: Options 3 and 4. These options effectively update Options 1 and 2 as described above so that the latest calculated housing and employment need figures can be evaluated in the SA process.

Table D.2.2: *Additional Growth Options identified at the Regulation 19 stage*

Growth option	Description of growth option
Option 3	Meet Medway's Local Housing Need (based on latest standard method calculation) and Objective Assessment of Employment Land Need. **Approximately 24,540 homes and 240,500m^2 employment land.**
Option 4	As for Option 3, plus meeting Gravesham's Unmet Housing Need. Initial consultation and duty to cooperate meetings with Gravesham Borough Council have identified a potential unmet housing need of 2,000 homes. **Approximately 26,540 homes and 240,500m^2 employment land.**

D.2.1.8 Options 3 and 4 have been evaluated following the same methodology used to assess Options 1 and 2 within the Regulation 18 Interim SA (2024), using the SA Framework as set out in **Appendix B**.

D.2.2 SA Objective 1 – Climate change mitigation

D.2.2.1 Medway's carbon dioxide (CO_2) emissions totalled 753.9 kilo tonnes in 2022, with per capita emissions of 2.7 tonnes, according to UK local authority CO_2 emissions data[5]. Domestic sources are reported as the largest contributor, followed by transport. Both growth options 3 and 4 have potential to increase CO_2 and other greenhouse gas (GHG) emissions to some extent through the construction and occupation of a large quantum of new housing and employment development, including via increased traffic likely to be generated through such development.

D.2.2.2 The potential for new development under any growth option to draw on renewable or low-carbon energy supplies is not known. Similarly, opportunities to link with sustainable travel networks and reduce reliance on private cars are not known at this scale of assessment.

D.2.2.3 Overall, given that Option 3 proposes a slightly lower total number of dwellings (25,540) than Option 4 (26,540), Option 3 could potentially have the least impact on emissions of the two although their impacts are likely to be similar, with a potential major negative impact identified for both.

D.2.3 SA Objective 2 – Climate change adaptation

D.2.3.1 The MLP area is highly susceptible to fluvial and tidal flooding due to its coastal location at the confluence of the River Thames, the River Medway and the Swale. Surface water flood risk is also prevalent. The introduction of new development and impermeable surfaces can exacerbate flooding issues, and densification of the existing urban areas is

[5] Department for Energy Security and Net Zero (2024) UK local authority and regional carbon dioxide emissions national statistics: 2005-2022. Available at: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022 [Date accessed: 13/06/25]

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likely to worsen the 'urban heat island' effect and lead to more challenges in terms of dealing with the effects of climate change such as extreme weather events, including drought.

D.2.3.2 The implementation of adaptive technologies and careful design can help to mitigate potential adverse effects associated with flooding and climate change, however, based on the quantum of growth proposed there is potential for both Options 3 and 4 to lead to adverse effects, to some extent. Overall, the impact is uncertain without knowledge of the specific location and design of development, although Option 3 could potentially lead to lower potential for adverse effects than Option 4 given the slightly lower quantum of growth proposed.

D.2.4 SA Objective 3 – Biodiversity and geodiversity

D.2.4.1 Medway supports a range of important biodiversity and geodiversity features including internationally, nationally and locally designated sites, as well as ancient woodland, priority habitats and the wider ecological network. Notably, large stretches of the Hoo Peninsula are designated as European sites, forming part of the Thames Estuary and Marshes Ramsar/Special Protection Area (SPA) and the Medway Estuary and Marshes Ramsar/SPA, and areas of Medway to the south of the estuary also border these designations.

D.2.4.2 There is potential for both growth options to have a minor adverse impact on biodiversity and geodiversity at the landscape scale due to the increased development related pressures and threats. This may include reductions in air quality and water quality/quantity, habitat fragmentation and recreational pressures on wildlife sites, despite any biodiversity net gain (BNG) provisions at the site level, owing to the large scale of development proposed and expected requirement of undeveloped land. Since Option 3 proposes a lower total quantum of growth than Option 4, Option 3 could potentially perform slightly better in this regard.

D.2.5 SA Objective 4 – Landscape and townscape

D.2.5.1 Whilst the central and southern areas of Medway are largely urbanised, the Plan area is also home to a section of the Kent Downs National Landscape. The north of the Plan area comprises the Hoo Peninsula, which is dominated by farmland and marshland, and is largely open and undeveloped, although some existing industrial areas border the River Medway along the coastline. Some areas of the Hoo Peninsula have been identified as highly sensitive to development and have low capacity for development.

D.2.5.2 Both Options 3 and 4 have the potential to lead to adverse effects on landscapes and townscapes through changes in character, tranquillity and sense of place, particularly in suburban and rural areas. The higher level of growth proposed under Option 4 may increase the need for development in sensitive landscapes such as the Hoo Peninsula, as well as Medway's other existing undeveloped areas such as the Capstone Valley in the south and the Kent Downs National Landscape in the south west. As such, Option 3 could perform marginally better in terms of landscape and townscape, although both have potential to lead to a major negative effect.

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D.2.6 SA Objective 5 – Pollution and waste

D.2.6.1 There are four Air Quality Management Areas (AQMAs) within Medway, declared due to exceedances in nitrogen dioxide (NO_2), indicating local issues with air pollution. The introduction of a large quantum of housing and employment growth, and the likely associated increase in traffic on the already congested road network, may exacerbate these issues with implications for the health of local residents and the natural environment.

D.2.6.2 Medway has an extensive watercourse network given its coastal location, with the River Medway, the River Thames and their tributaries, as well as tributaries of the Swale flowing through the Plan area. Whilst water pollution impacts will depend on the nature, scale and location of developments which are unknown, it is likely that the large scale of development proposed under the growth options would have potential to cause adverse effects on water quality, with likely increases in pollutant runoff and wastewater associated with the construction and occupation of new development.

D.2.6.3 The estimated total household waste produced within Medway in 2023/2024 was 113,851 tonnes, according to UK local authority household waste data[6]. New residential and employment-led development under both growth options is likely to result in a significant increase in waste generation, although the specific nature of development and associated types of waste to be generated are unknown. The Waste Needs Assessment (2024)[7] suggested there will be sufficient existing consented capacity to Medway's requirements for recycling/ composting capacity and 'other recovery' as well as inert waste management, but non-inert landfill capacity is more limited.

D.2.6.4 Overall, given that Option 3 proposes a slightly lower total number of dwellings (25,540) than Option 4 (26,540), Option 3 could potentially have the least impact on pollution and waste of the two although their impacts are likely to be similar, with a potential major negative impact identified for both.

D.2.7 SA Objective 6 – Natural resources

D.2.7.1 Medway is largely built-up in the south, with the land being predominantly 'urban' and Grade 3 according to the Agricultural Land Classification (ALC), whilst the Hoo Peninsula in the north and areas surrounding Rainham contains large areas of Grades 1, 3 and 4 land. Grades 1, 2 and 3a represent the best and most versatile (BMV) agricultural land and should be conserved for food production wherever possible. Much of the BMV land is adjacent to existing settlement boundaries in suburban and rural locations. Due to its geography, Medway has a high proportion of BMV land.

D.2.7.2 Whilst the specific location of development under the growth options is unknown, it is assumed that both options would seek to pursue a 'brownfield first' approach, in line with the NPPF. However, even with maximising infill and brownfield development within the urban areas, in order to accommodate 25,540–26,540 homes and 240,500m^2 of employment land there will be a need to utilise previously undeveloped land to some

[6] Department for Environment, Food and Rural Affairs (2025) Local Authority Collected Waste Statistics for 2023/2024. Available at: www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results [Date accessed: 24/04/25]

[7] BPP Consulting (2024) Medway Local Plan – Waste Evidence Base. Medway Waste Needs Assessment Update. Available at: https://medway.oc2.uk/document/20 [Date accessed: 13/06/25]

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extent, with potential adverse effects associated with the loss of agriculturally valuable soil and potentially the loss of land with ecological value, as discussed in **paragraph E.2.4.2.**

D.2.7.3 Owing to the slightly lower housing number under Option 3, this option would be likely to result in a relatively smaller extent of undeveloped land being lost to development, with potentially lesser adverse effects on natural resources than Option 4. However, both are likely to lead to a significant loss of undeveloped land and a major negative effect on natural resources.

D.2.8 SA Objective 7 – Housing

D.2.8.1 A positive effect would be likely for both growth options, as they would provide enough housing to satisfy the identified needs for Medway's population over the Plan period, in line with the requirements of paragraph 36 of the NPPF to positively prepare the Plan. Option 3 would seek to provide 25,540 homes, addressing Medway's needs unilaterally, and therefore providing a positive impact on housing when considered relative to the other option. Option 4 would also seek to contribute towards the indicative unmet needs of the neighbouring authority of Gravesham, which at the time of writing is estimated by Gravesham Borough Council to be approximately 2,000 dwellings, giving a c.8% uplift, and therefore also provides a positive impact on housing, albeit on a slightly larger scale.

D.2.8.2 At this high-level scale of assessment, the extent to which each growth option could contribute to meeting the different needs of the population on housing mix, provision of extra care housing, accessible housing and affordable homes is uncertain, but it is likely that providing a higher quantum of growth would have greater scope to provide a range of types and tenures. Therefore, Option 4 could potentially lead to greater positive effects than Option 3.

D.2.9 SA Objective 8 – Health and wellbeing

D.2.9.1 Medway's healthcare infrastructure includes the Medway Maritime Hospital and approximately 60 GP surgeries; these are predominantly located in the south of the Plan area in line with the development pattern. A number of leisure centres and public green spaces, including parks, playing fields, allotments and sports facilities, as well as the Public Right of Way (PRoW) network, provide recreational opportunities with benefits to health and wellbeing.

D.2.9.2 Since the location and density of growth under the proposed options is unknown, it is difficult to determine the likely effects in terms of accessibility to, and pressure on, healthcare and green spaces. Both options are likely to need additional health infrastructure provision to accommodate the proposed level of growth, with Option 4 to a slightly greater extent, particularly if directed towards the more rural settlements on the Hoo Peninsula and suburban areas where coverage and accessibility of healthcare infrastructure is more limited. In this regard, Option 3 could be seen as the best performing option since it proposes a lower quantum of growth.

D.2.10 SA Objective 9 – Cultural heritage

D.2.10.1 Medway has a rich historic environment with a range of designated heritage assets as well as numerous non-statutory archaeological and historic features of interest, reflecting Medway's military and industrial history. New development brings potential threats as well

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as opportunities in relation to the historic environment. Development in close proximity to cultural heritage features has the potential to adversely affect their significance or setting, particularly for development within undeveloped or suburban areas of Medway where there is the greatest likelihood for alteration of historic character. However, new development can also stimulate new investment and potentially enhance the local townscapes or improve the accessibility and appreciation of heritage assets.

D.2.10.2 As the site location, context and proximity to receptors is unknown, the potential impacts of the growth options on cultural heritage features are uncertain. Although, it is likely that pursuing a lower quantum of growth would have the greatest scope to avoid sensitive locations; as such, Option 3 could be seen as the better performing option.

D.2.11 SA Objective 10 – Transport and accessibility

D.2.11.1 Whilst Medway benefits from good motorway and rail accessibility, these methods of transport are frequently affected by delays and congestion. Medway's highway network is limited in capacity in some areas as a result of its geography and the historical pattern of development. The PRoW and cycle networks offer active travel links, although these are somewhat fragmented with varying coverage across the Plan area. Most of Medway's local services and facilities are concentrated in the urban area in the south.

D.2.11.2 The large quantum of new housing and employment growth proposed under the two options and associated uplift in local population is likely to result in increased traffic on the road network and increased demand on public transport. Consequently, both options could give rise to minor adverse effects through increasing pressure on the existing transport network, and increasing development in areas which have more limited access to sustainable transport options. In this regard, Option 3 could be seen as the best performing option since it proposes a lower quantum of growth. The emerging Strategic Transport Assessment provides further information regarding the transport network and the implications for development in Medway.

D.2.12 SA Objective 11 – Education

D.2.12.1 Numerous primary and secondary schools are distributed throughout Medway as well as opportunities for further education, including at the shared Medway Campus, offering opportunities for the local population to develop skills and gain qualifications. Sustainable access to education is more limited in the rural areas of Medway.

D.2.12.2 The location of proposed new homes under the growth options is not known and so their impact on existing education facilities is uncertain; however, a smaller number of proposed homes may put less pressure on existing provisions, as such making Option 3 potentially the best option in this regard. On the other hand, the introduction of new growth could also lead to investment in new education infrastructure with potential wider benefits, although such opportunities would depend on the specific location and distribution of growth.

D.2.13 SA Objective 12 – Economy and employment

D.2.13.1 A positive effect is likely for both growth options, as they would provide enough employment land to satisfy the identified needs for Medway's population over the Plan period, in line with the requirements of paragraph 36 of the NPPF to positively prepare the

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Plan. Both options propose the same level of employment growth of 240,500m^2 floorspace, and are therefore anticipated to provide the same increase in job opportunities.

D.2.13.2 In terms of access to employment opportunities, the highest density of existing employment land is in the central and southern extents of the Plan area. Whilst the location of proposed new homes and proximity to existing and new employment opportunities under the growth options is not known, it is possible that pursuing a lower quantum of growth as for Option 3 would lead to more sustainable outcomes in terms of access to employment. On balance, a minor positive impact is identified for both options as Medway's employment needs would be met, however some uncertainty remains regarding sustainable access to employment locations.

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D.3 Conclusions

D.3.1 Likely impacts of not satisfying the identified housing need

D.3.1.1 Four options for growth have been assessed in the SA process. Each of these options either meets or exceeds the housing need for residential growth in Medway for the Plan period, based on the available information and standard method calculation at the time of their identification.

D.3.1.2 In general, it is easier to avoid adverse impacts on natural environment SA Objectives such as landscape, biodiversity, climate change adaptation and natural resources when there is less development. An option for development that does not support the local housing need may therefore be a relatively sustainable option in this regard.

D.3.1.3 However, a growth option that does not satisfy the local development needs would be likely to result in significant adverse impacts on social and economic SA Objectives.

D.3.1.4 In accordance with the requirements of paragraph 36(a) of the NPPF (2024), local plans are 'sound' if they are "***positively prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development…*".

D.3.1.5 For the purpose of 'reasonable alternatives', a growth option that does not satisfy the local housing and economic needs for Medway, as a minimum, would not allow for a 'sound' plan and in that sense would not be considered reasonable.

D.3.1.6 While no formal requests have been made at this stage regarding providing additional homes or employment floorspace in Medway to meet unmet needs of neighbouring authorities, past engagement with Gravesham Borough Council has highlighted a potential unmet need of approximately 2,000 homes. The Council are therefore committed to assessing the potential impacts of taking on this potential unmet need.

D.3.2 SA findings

D.3.2.1 As discussed in **section D.1.2**, the high-level assessment of housing growth is limited by lack of detail with regard to size, nature and location of proposed development.

D.3.2.2 In summary, all options will meet the housing needs of Medway. Option 4 proposes the highest level of growth (totalling 26,540 dwellings) which would generally be expected to result in greater potential for adverse effects in relation to environmental SA Objectives such as air quality, climate change, biodiversity, natural resources and landscape. This option would also be likely to present the greatest challenge with respect to capacity issues and pressure on existing services and infrastructure required to deliver the proposed levels of growth and meet the day-to-day needs of the population.

D.3.2.3 Option 1 would meet Medway's identified housing need (at the time of its identification in June 2024), and Option 3 sets out to meet the latest calculated need based on the

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Standard Method calculation (1,636 dwellings per annum[8]); although, both options would not include any provisions to meet other authorities' needs, unlike Options 2 or 4.

D.3.2.4 However, as noted in **section D.2.1**, at the time of writing there has been no formal confirmation on the existence, or extent, of any unmet housing need in Gravesham Borough or any other authority surrounding Medway. Given Medway's environmental and transport constraints, all options could lead to similar challenges in terms of accommodating the required level of growth whilst avoiding or minimising potential for adverse effects. Overall, Option 3 is identified, by a narrow margin, as the best performing as it will meet the latest calculated housing and employment needs for Medway without risking compromising its environmental assets or social infrastructure via over-supply.

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[8] Turley (2025) The standard method of assessing housing need. Available at: https://www.turley.co.uk/sites/default/files/pdf/file/2025-05/turley_lpdf_-_revised_standard_method_analysis_may2025_0.pdf [Date accessed: 13/06/25]

Appendix E: Site Assessment Methodology and Assumptions

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E.1 Overview

E.1.1 The purpose of this appendix

E.1.1.1 This appendix provides additional context to **Chapter 4** of the main Regulation 19 Sustainability Appraisal (SA) Report (**Volume 2**) regarding the methodology used to assess reasonable alternative sites to inform the emerging Medway Local Plan (MLP).

E.1.1.2 Topic-specific methodologies have been established which reflect the differences between the SA Objectives and how different receptors should be considered in the appraisal process for reasonable alternative sites. There are also a number of assumptions and limitations noted within each of the following sections, which should be borne in mind when considering the assessment findings.

E.1.1.3 The topic-specific methodologies set out in **Boxes E.2.1** to **E.13.2** explain how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 4.4** within the main Regulation 19 SA Report (**Volume 2**).

E.1.1.4 All distances stated in site assessments are measured 'as the crow flies' from the closest point of the site/receptor in question, unless otherwise stated.

E.1.1.5 The appraisal of each reasonable alternative site proposed (non-strategic sites within **Appendix G** and strategic sites within **Appendix F**) evaluates the likely significant effects of each reasonable alternative against the 12 SA Objectives, using the methodology as set out in this appendix.

E.1.1.6 The level of detail that can be expressed through the SA assessments depends on the level of detail provided associated with the part of the Plan in question. The 27 strategic sites assessed within **Appendix F** have been evaluated using the site assessment methodology as a baseline, however the scoring of strategic sites has accommodated accompanying masterplans and other supporting information provided by the Council which has resulted in a more nuanced approach in the assessment against SA receptors.

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E.2 SA Objective 1 – Climate change mitigation

E.2.1 Introduction and context

E.2.1.1 **Box E.2.1** sets out the methodology used to appraise the reasonable alternative sites against SA Objective 1: Climate change mitigation.

E.2.1.2 The incorporation of green infrastructure (GI) within developments presents several opportunities to mitigate climate change, for example, through providing natural cooling to combat the 'urban heat island' effect, reducing the effects of air pollution and providing more pleasant outdoor environments to encourage active travel[1].

E.2.1.3 However, it is likely that new development would result in an increase in local greenhouse gas (GHG) emissions due to the increase in the local population and the number of operating businesses. The increase in GHG emissions caused by new developments is often associated with impacts of the construction phase, the occupation and operation of homes and businesses, fuel consumption, and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible. There may be opportunities for renewable energy generation to be incorporated within development, which would help to reduce reliance on energy generated from fossil fuels, although such details are not available at this stage of plan making.

E.2.1.4 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment of carbon emissions. Greater detail of carbon data would help to better quantify effects and would enable the SA process to evaluate changes to carbon emissions as a consequence of the Plan.

E.2.1.5 In the absence of site-specific carbon footprint data, and at this stage of the assessment process, the likely emissions arising from each reasonable alternative site is uncertain.

E.2.2 Climate change mitigation receptors

Box E.2.1: *SA Objective 1: Carbon emissions*

Score	Likely Impact - Carbon emissions
+/-	The likely emissions arising from each reasonable alternative site is uncertain.

Notes
The estimated CO_2 emissions for Medway in 2022 was 753.9 kilo tonnes, with per capita emissions of 2.7 tonnes, according to UK local authority CO_2 emissions data[2].

[1] TCPA (2023) What is Green Infrastructure? Available at: https://www.tcpa.org.uk/what-is-green-infrastructure/ [Date accessed: 13/03/25]

[2] Department for Energy Security and Net Zero (2024) UK local authority and regional carbon dioxide emissions national statistics: 2005-2022. Available at: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022 [Date accessed: 28/04/25]

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E.3 SA Objective 2: Climate change adaptation

E.3.1 Introduction and context

E.3.1.1 **Boxes E.3.1** to **E.3.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Climate change adaptation.

E.3.1.2 It is assumed that development proposals will be in perpetuity, and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial or surface water flooding.

E.3.2 Climate change adaptation receptors

Box E.3.1: *SA Objective 2: Fluvial flooding*

Score	Likely Impact - Fluvial flooding
--	Development proposals which coincide with Flood Zone 3.
-	Development proposals which coincide with Flood Zone 2.
+	Development proposals which are located wholly within Flood Zone 1.

Notes
Data for fluvial flooding has been derived from the latest available Environment Agency Flood Map for Planning (Rivers and Sea)[3], such that: • **Flood Zone 3:** Greater or equal to 1% chance of river flooding in any given year or greater than 0.5% chance of sea flooding in any given year; • **Flood Zone 2:** Between 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year; and • **Flood Zone 1:** Less than 0.1% chance of river and sea flooding in any given year.

[3] Environment Agency (2025) Flood Map for Planning – Flood Zones (Published 25 March 2025). Available at: https://environment.data.gov.uk/dataset/04532375-a198-476e-985e-0579a0a11b47 [Date accessed: 30/04/25]

Box E.3.2: *SA Objective 2: Surface water flooding*

Score	Likely Impact - Surface water flooding
--	Development proposals which coincide with areas at high risk of surface water flooding.
-	Development proposals which coincide with areas at low and/or medium risk of surface water flooding.
0	Development proposals which are not located in areas determined to be at risk of surface water flooding, or are in areas at very low risk of surface water flooding.

Notes

The assessment is based on the Environment Agency surface water flood risk data[4], such that[5]:

- **High risk:** more than 3.3% chance of flooding each year;
- **Medium risk:** between 1% - 3.3% chance of flooding each year; and
- **Low risk:** between 0.1% - 1% chance of flooding each year.

Areas determined to be at very low risk of flooding (less than 0.1% chance) would be expected to result in a negligible impact on surface water flooding for the purposes of this assessment.

Box E.3.3: *SA Objective 2: Flood defences*

Score	Likely Impact – Flood defences
--	Development proposals which are within 20m of toe of an embankment (includes defences maintained, defences raised, set back embankment).
0	Development proposals which are located beyond 20m of toe of an embankment (includes defences maintained, defences raised, set back embankment).

Notes

The Environment Agency has defined a number of flood defence schemes for the Thames, Medway and Swale Estuaries[6,7]. These schemes also include areas for habitat enhancement and habitat creation. Development coincident with these schemes, or within 20m of the toe of a proposed/existing flood defence, is considered unlikely to be able to safeguard the viability of future flood defences and has potential to result in a negative impact on climate change adaptation in the MLP area.

At the time of writing, no spatial data has been available to inform assessments in the SA with regard to areas identified for habitat enhancement or creation.

[4] Environment Agency (2024) Risk of Flooding from Surface Water Extent: 3.3 percent annual chance, 1 percent annual chance, 0.1 percent annual chance (updated 05 January 2024). Available at: https://www.data.gov.uk/dataset/95ea1c96-f3dd-4f92-b41f-ef21603a2802/risk-of-flooding-from-surface-water-extent-3-3-percent-annual-chance [Date accessed: 13/03/25]

[5] Environment Agency (2013) Risk of flooding from surface water. Available at: https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map/risk-of-flooding-from-surface-water-understanding-and-using-the-map [Date accessed: 13/03/25]

[6] Environment Agency (2021) Thames Estuary 2100 (TE2100). Available at: https://www.gov.uk/government/publications/thames-estuary-2100-te2100 [Date accessed: 13/03/25]

[7] Environment Agency (2019) Medway Estuary and Swale flood and coastal risk management strategy. Available at: https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy [Date accessed: 13/03/25]

E.4 SA Objective 3: Biodiversity and geodiversity

E.4.1 Introduction and context

E.4.1.1 **Boxes E.4.1** to **E.4.10** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, flora, fauna and geodiversity.

E.4.1.2 The biodiversity objective considers adverse impacts of the proposed development at a landscape scale. It focuses on an assessment of proposed development on a network of designated and undesignated sites, wildlife corridors and individual habitats within the Plan area.

E.4.1.3 Where a site is coincident with, adjacent to or located in close proximity to an ecological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

E.4.1.4 It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover in the Plan area. This would also be expected to lead to greater levels of fragmentation and isolation for the wider ecological network, such as through the loss of stepping-stones and corridors. This will restrict the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land or land with environmental value is considered under SA Objective 6: Natural Resources in this assessment (see **Chapter E.7**).

E.4.1.5 It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report.

E.4.1.6 Protected species survey information is not available for the sites within the Plan area. It is acknowledged that data is available from the Kent and Medway Biological Records Centre. However, it is noted that this data may be under recorded in certain areas. This under recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results, favouring well-recorded areas. As such, impacts on protected species have not been assessed on a site-by-site basis.

E.4.1.7 It is anticipated that the Council will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of priority species and priority habitats protected under the Natural Environment and Rural Communities (NERC) Act.

E.4.1.8 It is assumed that mature trees and hedgerows will be retained where possible.

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E.4.2 Biodiversity receptors

Box E.4.1: *SA Objective 3: European sites*

Score	Likely Impact - European site e.g. SAC, SPA or Ramsar site
--	Development proposal coincides with, or is within 400m of, a European site. Likelihood of direct impacts.
-	Development proposal is located within a recognised Zone of Influence (ZoI) or similar spatial catchment relative to a European site. Likelihood of direct or indirect impacts.
+/-	Development located outside of a recognised ZoI where, in absence of Habitats Regulations Assessment (HRA) conclusions, the effect of development is uncertain.

Notes
The area within which development has the potential to have a direct / indirect adverse impact on the integrity of a European site is referred to as the buffer zone. This includes Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites. The width of the buffer zones applied in this assessment has been informed by the emerging HRA[8]. All new development within Medway has the potential to lead to adverse effects in terms of air quality (arising from traffic) and water quality. In terms of recreational impacts, a 6km has been applied to the Medway and Thames Estuary and Marshes SPA and Ramsar sites on the basis of the Strategic Access Management and Monitoring (SAMMs) work that has been undertaken to date[9]. A 7km buffer has been applied to the North Downs Woodland SAC on the basis of visitor survey work[10] carried out at Boxley Warren Local Nature Reserve (LNR), which forms part of the Wouldham to Detling Escarpment Site of Special Scientific Interest (SSSI) component of the SAC. A 400m zone has been applied on the basis of urbanisation concerns, and particularly the predation of ground-nesting birds by domestic cats[11]. Data for European sites is available from Natural England[12].

[8] Lepus Consulting (2024) Habitats Regulations Assessment of the Medway Local Plan: Regulation 18 HRA Report.

[9] Footprint Ecology (2014). Thames, Medway & Swale Estuaries Strategic Access Management and Monitoring Strategy. Available at: https://www.medway.gov.uk/info/200149/planning_policy/146/current_planning_policies/5 [Date accessed: 13/03/25]

[10] Maidstone Borough Council (2012) Boxley Warren Local Nature Reserve Visitor Surveys. Main Results Tabulations by Location of Interview.

[11] Institute of Estuarine & Coastal Studies (IECS) University of Hull (2013) The Waterbird Disturbance Mitigation Toolkit. Available at: https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer_public/8f/bd/8fbdd7e9-ea6f-4474-869f-ec1e68a9c809/11367.pdf [Date accessed: 13/03/25]

[12] Natural England (2024) Special Areas of Conservation (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdfcff_0 [Date accessed: 13/03/25]

Box E.4.2: *SA Objective 3: Sites of Special Scientific Interest*

Score	Likely Impact - SSSI
--	Development coincides with, or is located adjacent to, an SSSI. Likelihood of direct impacts. Development is located within 400m of Lodge Hill SSSI.
-	Within an IRZ which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.
0	Development within an IRZ which does not indicate the proposed development needs to be consulted on with Natural England.
+	Development proposals which would enhance features of an SSSI.

Notes
Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool developed by Natural England which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Where a site falls within more than one SSSI IRZ the worst-case risk zone is reported upon in the assessment. A 400m buffer has been applied around Lodge Hill SSSI, reflecting the sensitivity of the site to impacts on ground nesting birds and based on previous advice given by RSPB and Kent Wildlife Trust[13]. Data for SSSIs and IRZs is available from Natural England[14].

Box E.4.3: *SA Objective 3: National Nature Reserves*

Score	Likely Impact - NNR
--	Development coincides with an NNR. Likelihood of direct impacts.
-	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on NNRs.
+	Development proposals which would enhance or create an NNR.

Notes
National Nature Reserves (NNRs) were established to protect some of England's most important habitats, species and geology, and to provide 'outdoor laboratories' for research. Data for NNRs is available from Natural England[15].

[13] Medway Core Strategy Examination in Public Matter 5: Lodge Hill. Available at: https://www.medway.gov.uk/downloads/download/325/medway_core_strategy_matter_5_lodge_hill [Date accessed: 13/03/25]

[14] Natural England (2024) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 02nd December 2024. Available at: https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones [Date accessed: 13/03/25]

[15] Natural England (2024) National Nature Reserves (England). Available at: https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england [Date accessed: 28/02/24]

Box E.4.4: *SA Objective 3: Ancient woodland*

Score	Likely Impact - Ancient woodland
--	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.
-	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.
0	Development proposal would not be anticipated to impact ancient woodland.
+	Development proposals which would enhance ancient woodland.

Notes
Ancient woodland is defined as an area that has been wooded continuously since at least 1600AD and includes 'ancient semi-natural woodland' and 'plantations on ancient woodland sites', both of which have equal protection under the National Planning Policy Framework (NPPF)[16]. Data for ancient woodlands is available from Natural England[17].

Box E.4.5: *SA Objective 3: Local Nature Reserves*

Score	Likely Impact - LNR
-	Development proposal could potentially result in adverse impacts on an LNR, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on an LNR.
+	Development proposals which would enhance or create an LNR.

Notes
Local Nature Reserves (LNRs) are statutory designations, representing places with wildlife or geological features that are of special interest locally, which give people special opportunities to study and learn about them or simply enjoy and have contact with nature. Data for LNRs is available from Natural England[18].

[16] Forestry Commission and Natural England (2022) Ancient woodland, ancient trees and veteran trees: protecting them from development. Available at: https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences [Date accessed: 13/03/25]

[17] Natural England (2024) Ancient Woodland (England). Available at: https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodland-england [Date accessed: 13/03/25]

[18] Natural England (2024) Local Nature Reserves (England). Available at: https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england [Date accessed: 13/03/25]

Box E.4.6: *SA Objective 3: Local Wildlife Sites*

Score	Likely Impact – Local Wildlife Sites
-	Development proposal coincides or adjacent to an LWS. Likelihood of direct impacts.
0	Development not anticipated to result in adverse impacts on an LWS.
+	Development proposals which would enhance or create an LWS.

Notes
Local Wildlife Sites (LWS), formerly known as Sites of Nature Conservation Interest (SNCI) are non-statutory designated sites within Kent. They are endorsed by the Kent Wildlife trust on behalf of the Kent Nature Partnership[19]. Data for LWSs has been provided by Medway Council.

Box E.4.7: *SA Objective 3: Marine Conservation Zones*

Score	Likely Impact – Marine Conservation Zone
-	Development proposal coincides or adjacent to an MCZ. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on an MCZ.
+	Development proposal anticipated to enhance an MCZ.

Notes
Marine Conservation Zones (MCZs) are designated under the Marine and Coastal Access Act (2009)[20]. MCZs protect a range of nationally important habitats and species. Data for MCZs has been provided by Natural England[21]

Box E.4.8: *SA Objective 3: Priority habitat*

Score	Likely Impact - Priority habitat
-	Development proposal coincides with a priority habitat.
0	Development proposal does not coincide with a priority habitat.
+	Development proposals which would enhance or create a priority habitat.

Notes
For the purposes of this assessment, impacts on priority habitats have been considered in the context of Natural England's publicly available Priority Habitat Inventory database[22]. It is acknowledged this may not reflect current local site conditions in all instances.

[19] Kent Wildlife Trust (2015) Local Wildlife Sites in Kent. Criteria for Selection and Delineation, Version 1.5. Available at: https://www.kentwildlifetrust.org.uk/sites/default/files/2023-01/Local%20Wildlife%20Sites%20in%20Kent%20-%20Selection%20and%20Delineation%20v1.8%20Dec22.pdf [Date accessed: 13/03/25]

[20] Marine and Coastal Access Act 2009. UK Public General Acts. Available at: www.legislation.gov.uk/ukpga/2009/23/contents [Date accessed: 13/03/25]

[21] Natural England (2023). Marine Conservation Zones. Available at: www.data.gov.uk/dataset/80c075c3-1880-44a0-bffc-69e20f307c21/marine-conservation-zones-england [Date accessed: 13/03/25]

[22] Natural England (2025). Priority Habitats Inventory (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::priority-habitats-inventory-england/about[Date accessed: 30/04/25]

Box E.4.9: *SA Objective 3: Regionally Important Geological and Geomorphological Sites*

Score	Likely Impact - RIGGS
-	Development proposal coincides with a RIGGS.
0	Development proposal does not coincide with a RIGGS.

Notes
Regionally important geological and geomorphological sites (RIGGS) are non-statutory sites selected to protect the most important places for geology, geomorphology, and soils[23]. RIGGS data supplied by Medway Council.

Box E.4.10: *SA Objective 3: Open mosaic habitat*

Score	Likely Impact – Open mosaic habitat
-	Development proposal coincides with an open mosaic habitat.
0	Development proposal does not coincide with an open mosaic habitat.
+	Development proposals which enhance or create an open mosaic habitat.

Notes
Open mosaic habitats indicate areas of previously developed or brownfield land that have potential to support diverse habitats and a rich species assemblage, particularly invertebrates. Open mosaic habitat data is available from Natural England[24].

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[23] Geoconservation Kent (2025). Designated sites and areas of interest resources. Available at https://www.geoconservationkent.org.uk/index.php?option=com_content&view=article&id=85&Itemid=21 [Date accessed: 13/03/25]

[24] Natural England (2024). Open Mosaic Habitat. June 2024. Available at: www.data.gov.uk/dataset/8509c11a-de20-42e8-9ce4-b47e0ba47481/open-mosaic-habitat-draft [date accessed: 13/03/25]

E.5 SA Objective 4: Landscape and townscape

E.5.1 Introduction and context

E.5.1.1 **Boxes E.5.1** to **E.5.9** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Landscape.

E.5.1.2 Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.

E.5.1.3 A proportion of the Kent Downs National Landscape lies within the south of the MLP area. The Kent Downs AONB Management Plan (2021-2026)[25] sets out in its Sustainable Development Principles SD8 that it will "*ensure proposals, projects and programmes do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs AONB*".

E.5.1.4 It is assumed that any future development would be accompanied by a Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA) if necessary to consider any potential for adverse impacts.

E.5.1.5 Baseline data on Landscape Character Areas within the Local Plan area are derived from the Medway Landscape Character Assessment (LCA) (2024)[26] as provided by the Council. Key characteristics of each character area have informed the appraisal of each development proposal against the landscape objective. 'Condition' and 'Sensitivity' assessments are included in the LCA. The methodology section of the assessment states that while condition and sensitivity are assessed these factors may vary across each character area. Given that the detailed nature of the landscape in relation to each site is unknown, the assessment of impact is based on the overall landscape character descriptions. It is recognised that character areas found to be in poor condition or of moderate sensitivity may be more capable of accommodating development than more sensitive landscape character areas or those in good condition; however, such judgements would require a more detailed and fieldwork-based approach of landscape capacity.

[25] Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026. Available at: https://kentdowns.org.uk/management-plan-2021-2026/ [Date accessed: 13/03/25]

[26] LUC (2024) Medway Landscape Character Assessment. Final Report, June 2024. Available at: https://medway.oc2.uk/docfiles/20/Landscape%20Character%20Assessment.pdf [Date accessed: 13/03/25]

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E.5.1.6 The Draft Hoo Landscape Sensitivity and Capacity Study (February 2019)[27] has been produced to help inform decision making regarding the potential development of an extension to Hoo St Werburgh. The study has identified ten land parcels within the Hoo Peninsula, and each parcel has been assessed for its sensitivity, value and capacity. The study states:

E.5.1.7 *"Landscape Sensitivity depends on the type, nature and magnitude of the proposed change as well as on the landscape's characteristics. High sensitivity indicates a landscape vulnerable to change and therefore less able to accommodate change without significant adverse effects. Low sensitivity indicates a landscape sufficiently robust to accommodate change without significant adverse effects.*

E.5.1.8 *Landscape capacity is the extent to which a particular landscape type is able to accept a specific kind of change (e.g. housing, mining, forestry, wind farms) without significant effects on its character. Capacity evaluates landscape sensitivity against landscape value and considers the degree to which landscape character is either vulnerable to change, or robust enough to recover from harm."*

E.5.1.9 Information relating to the historic environment, including associated designations has been assessed under SA Objective 9: Cultural Heritage (see **Chapter E.10**).

E.5.2 Landscape receptors

Box E.5.1: *SA Objective 4: Kent Downs AONB (National Landscape)*

Score	Likely Impact – Kent Downs AONB (National Landscape)
--	Development proposal coincides or adjacent to the AONB. Potential to result in direct impacts on the character and/or setting of the designated landscape.
-	Development proposal located in close proximity to the AONB. Potential to result in impacts on the views experienced from the AONB and/or setting of the designated landscape.
0	Development proposal is not expected to result in any adverse impacts on the AONB.

Notes
A proportion of the Kent Downs AONB (National Landscape) lies within the south of the Medway Local Plan area. Potential negative impacts on the AONB and its setting have been assessed with regard to the Kent Downs AONB Management Plan (2021-2026)[28] and Kent Downs Landscape Character Assessment Update (2020)[29] .

[27] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 13/03/25]

[28] Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026. Available at: https://kentdowns.org.uk/management-plan-2021-2026/ [Date accessed: 13/03/25]

[29] Fiona Fyfe Associates (2020) Kent Downs AONB Landscape Character Assessment Update 2020. Available at: https://kentdowns.org.uk/landscape-character-assessment-2020/ [Date accessed: 27/05/25]

Box E.5.2: *SA Objective 4: Country Park*

Score	Likely Impact – Country Park
--	Development proposal coincides with country park. Potential to result in direct impacts.
-	Development proposal located in close proximity or adjacent to a country park. Potential to result in impacts on the views experienced from the country park and/or its setting.
0	Development proposal is not expected to result in any adverse impacts on a country park.
++	Development proposals that include the development of a new country park

Notes
There are several country parks located in the south of the Plan area. Potential impacts to country parks, including views from country parks, have been assessed based on the distance between the development proposals and the country park, as well as the landscape within and surrounding the proposals as determined through a desk-based appraisal.

Box E.5.3: *SA Objective 4: Landscape character*

Score	Likely Impact – Landscape Character Assessment
-	Development proposals considered to be potentially discordant with the descriptions published in the Landscape Character Assessment.
0	Development proposals which would not be anticipated to discord with the descriptions published in the Landscape Character Assessment, or are located within areas classed as 'urban' and therefore comprise built-up areas.
+	Development proposals which would protect or enhance features of the landscape as identified within the Landscape Character Assessment.

Notes
Baseline data on Landscape Character Areas within the Local Plan area are derived from the Medway Landscape Character Assessment (2024)[30]. Key characteristics of each Landscape Character Areas have informed the appraisal of each development proposal against the landscape objective.

[30] LUC (2024) Medway Landscape Character Assessment. Final Report, June 2024. Available at: https://medway.oc2.uk/docfiles/20/Landscape%20Character%20Assessment.pdf [Date accessed: 13/03/25]

Box E.5.4: *SA Objective 4: Landscape sensitivity*

Score	Likely Impact - Landscape Sensitivity Assessment
--	Development proposals located within areas of 'medium-high' or 'high' landscape sensitivity.
-	Development proposals located within areas of 'low-medium' or 'moderate' sensitivity.
+/-	Development proposals located outside of the Landscape Sensitivity Assessment study area.
0	Development proposals located within areas of 'low' sensitivity.

Notes
The Draft Hoo Landscape Sensitivity and Capacity Study (February 2019)[31] has been produced to help inform decision making regarding the potential development of an extension to Hoo St Werburgh. The study has identified ten land parcels within the Hoo Peninsula, and each parcel has been assessed for its sensitivity, value and capacity. Development proposals have been assessed based on the parcel in which they are located.

Box E.5.5: *SA Objective 4: Landscape capacity*

Score	Likely Impact - Landscape Capacity Assessment
--	Development proposals located within areas of 'medium-high' or 'high' landscape capacity.
-	Development proposals located within areas of 'low-medium' or 'medium' capacity.
+/-	Development proposals located outside of the Landscape Capacity Assessment study area.
0	Development proposals located within areas of 'low' capacity.

Notes
The Draft Hoo Landscape Sensitivity and Capacity Study (February 2019)[32] has been produced to help inform decision making regarding the potential development of an extension to Hoo St Werburgh. The study has identified ten land parcels within the Hoo Peninsula, and each parcel has been assessed for its sensitivity, value and capacity. Development proposals have been assessed based on the parcel in which they are located.

[31] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 13/03/25]

[32] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 13/03/25]

Box E.5.6: *SA Objective 4: Alter views from the PRoW network and National Trails*

Score	Likely Impact – Alter views from the PRoW network and National Trails
-	Development proposals located which may alter views of a predominantly rural or countryside landscape experienced by users of the PRoW network.
0	Development proposals are not considered to significantly alter views experienced by users of the PRoW network.
+	Development proposals which could potentially improve the views experienced from the nearby PRoW network.

Notes
Potential views from the PRoW network are identified through the use of aerial photography and Google Maps. Data for PRoWs has been provided by Medway Council. National trail and coastal paths (the King Charles III Coast Path) data has been incorporated into the assessments and is available from Natural England[33] [34].

Box E.5.7: *SA Objective 4: Alter views experienced by local residents*

Score	Likely Impact – Alter views experienced by local residents
-	Development proposals located which may alter views of a predominantly rural landscape or greenfield land experienced by residents.
0	Development proposals are not considered to significantly alter views experienced by residents.
+	Development proposals which could potentially improve the views experienced by residents.

Notes
Potential views from residential properties are identified through the use of aerial photography and Google Maps. In locations characterised by retail, or similar commercial uses, a precautionary approach is taken, and it is assumed that there may be residential properties on the upper floors above the ground floor commercial spaces.

Box E.5.8: *SA Objective 4: Coalescence*

Score	Likely Impact - Coalescence
-	Development proposals considered to reduce the separation between existing settlements and increase the risk of coalescence.
0	Development proposals unlikely to increase the risk of coalescence.

Notes
Potential risk of coalescence has been identified through the use of aerial photography and Google Maps.

[33] Natural England (2024). National trails. Available at: www.data.gov.uk/dataset/ac8c851c-99a0-4488-8973-6c8863529c45/national-trails [Date accessed: 13/03/25]

[34] Natural England (2024). King Charles III England Coast Path Route. Available at: www.data.gov.uk/dataset/2cc04258-a5d4-4eea-823d-bf493aa31eef/king-charles-iii-england-coast-path-route [Date accessed: 13/05/25]

Box E.5.9: *SA Objective 4: Urbanisation of the countryside*

Score	Likely Impact – Urbanisation of the countryside
-	Development proposals considered to increase the risk of future urban development spreading further into the wider landscape.
0	Development proposals unlikely to increase the risk of future urban development spreading further into the wider landscape.

Notes
Potential risk of urban sprawl has been identified through the use of aerial photography and Google Maps.

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E.6 SA Objective 5: Pollution and waste

E.6.1 Introduction and context

E.6.1.1 **Boxes E.6.1** to **E.6.7** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Pollution and waste.

E.6.1.2 The assessment under this objective considers the potential for reasonable alternative sites to generate pollution and waste associated with the construction and occupation of new development, as well as the potential to expose site end users to existing sources of pollution.

E.6.1.3 It is expected that new development would result in an increase in the local population, and consequently an increase in household waste generation.

E.6.1.4 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment against waste. In the absence of site-specific waste information relating to the amount of waste likely to be associated with new development sites, and the specific end uses of non-residential reasonable alternative sites, at this stage of the assessment process the likely waste impacts arising from each reasonable alternative site is uncertain.

E.6.2 Pollution and waste receptors

Box E.6.1: *SA Objective 5: AQMA*

Score	Likely Impact - AQMA
-	Development proposals located within 200m of an AQMA.
0	Development proposals located over 200m from an AQMA.

Notes
Air Quality Management Areas (AQMAs) are considered to be an area where the national air quality objective will not be met. Introducing new development within an AQMA would therefore be expected to expose new residents to poor air quality. A buffer distance of 200m has therefore been applied in this assessment. UK AQMA data is available from Defra[35].

[35] Department for Environment Food and Rural Affairs (2024) UK Air Information Resource. Available at: https://uk-air.defra.gov.uk/aqma/maps/ [Date accessed: 13/03/25]

Box E.6.2: *SA Objective 5: Main road*

Score	Likely Impact - Main road
-	Development proposals located within 200m of a main road.
0	Development proposals located over 200m from a main road.

Notes
It is assumed that sites located in close proximity to main roads would expose site end users to transport associated noise and air pollution. Negative impacts on the long-term health of site end users would be anticipated where residents would be exposed to air pollution. In line with the Design Manual for Roads and Bridges (DMRB) guidance, it is assumed that receptors would be most vulnerable to these impacts located within 200m of a main road[36] [37]. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, *"beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant"*[38]. A 200m buffer distance from main roads (motorways and A-roads) has therefore been applied in this assessment. Road data is available from Ordnance Survey[39].

Box E.6.3: *SA Objective 5: Railway line*

Score	Likely Impact – Railway line
-	Development proposals located within 200m of a railway line.
0	Development proposals located over 200m from a railway line.

Notes
It is assumed that sites located in close proximity to railway lines would expose site end users to transport associated noise and air pollution, and potential disturbance from vibrations. Negative impacts on the long-term health of site end users are possible where residents would be exposed to such sources of pollution. In line with the DMRB guidance[40] [41] the 200m buffer has been applied throughout this assessment to both existing road and rail sources. Railway network data has been supplied by Medway Council.

[36] Design Manual for Roads and Bridges (2019) LA 105 Air Quality. Available at: www.standardsforhighways.co.uk/search?discipline&lifecycle=&dmrbSection&mchwVolume&mchwSection&to=2024-02-29&from=2024-02-29&pageNumber=1&suite=DMRB&suite=MCHW&suite=IAN&q=LA%20105 [Date accessed: 13/03/25]

[37] Design Manual for Roads and Bridges (2019) LA 104 Environmental assessment and monitoring. Available at: www.standardsforhighways.co.uk/search/0f6e0b6a-d08e-4673-8691-cab564d4a60a [Date accessed: 13/03/25]

[38] Department for Transport (2023) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 13/03/25]

[39] Ordnance Survey (2023) OS Open Roads. Available at: www.ordnancesurvey.co.uk/business-government/products/open-map-roads [Date accessed: 13/03/25]

[40] Design Manual for Roads and Bridges (2019) LA 105 Air Quality. Available at: www.standardsforhighways.co.uk/search?discipline&lifecycle=&dmrbSection&mchwVolume&mchwSection&to=2024-02-29&from=2024-02-29&pageNumber=1&suite=DMRB&suite=MCHW&suite=IAN&q=LA%20105 [Date accessed: 13/03/25]

[41] Design Manual for Roads and Bridges (2019) LA 104 Environmental assessment and monitoring. Available at: www.standardsforhighways.co.uk/search/0f6e0b6a-d08e-4673-8691-cab564d4a60a [Date accessed: 13/03/25]

Box E.6.4: *SA Objective 5: Water quality*

Score	Likely Impact - Water quality
-	Development proposals located within 10m of a watercourse.
+/-	Development proposals located over 10m from a watercourse.
+	Development proposal includes integration of GI or the naturalisation of watercourses.

Notes
Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water. A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per available guidance[42][43]. However, it should be noted that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff and should be considered on a site-by-site basis; as such, sites over 10m from a watercourse are scored as 'uncertain' in this assessment. Watercourse mapping data is available from the Ordnance Survey[44].

Box E.6.5: *SA Objective 5: Groundwater SPZ*

Score	Likely Impact - Groundwater SPZ
-	Development proposal coincides with a groundwater SPZ.
0	Development proposal does not coincide with a groundwater SPZ.

Notes
The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any site that is located within a groundwater SPZ could potentially have an adverse impact on groundwater quality. Groundwater source catchments are divided into three zones: • Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source; • Outer Zone (Zone II) – 400-day travel time; and • Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source. SPZ data is available from the Environment Agency[45].

[42] DAERA (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value [Date accessed: 13/03/25]

[43] Wild Trout Trust. Buffer Zones. Available at: www.wildtrout.org/content/buffer-zones [Date accessed: 13/03/25]

[44] Ordnance Survey (2023) OS Open Rivers. Available at: www.ordnancesurvey.co.uk/business-government/products/open-map-rivers [Date accessed: 13/03/25]

[45] Environment Agency (2024) Source Protection Zones. Available at: https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged [Date accessed: 29/02/24]

Box E.6.6: *SA Objective 5: Increase in air pollution*

Score	Likely Impact - Increase in air pollution
--	Development proposals which could potentially result in a significant increase in air pollution.
-	Development proposals which could potentially result in a minor increase in air pollution.
0	Development would be expected to result in a negligible increase in air pollution.
+/-	The air pollution likely to be generated as a result of development proposals is uncertain.

Notes
It is assumed that development would result in an increase in traffic and thus traffic generated air pollution. Residential sites proposed for the development of between ten and 99 dwellings would therefore be expected to have a minor negative impact on local air pollution[46]. Residential sites proposed for the development of 100 dwellings or more would be expected to have a major negative impact. Employment sites which propose the development of between 0.1ha and 0.99ha of employment floorspace would be expected to have a minor negative impact and sites which propose 1ha or more would be expected to have a major negative impact. Where a site is proposed for the development of nine dwellings or less, or for 0.1ha of employment floorspace or less, a negligible impact on local air quality would be anticipated.

Box E.6.7: *SA Objective 5: Waste*

Score	Likely Impact - Waste
+/-	The waste likely to be generated as a result of development proposals is uncertain without further site-specific details.

Notes
The estimated total household waste produced within Medway in 2023/2024 was 113,851 tonnes, according to UK local authority household waste data[47]. It is assumed that new residents in Medway will have an annual waste production of 377kg per person, in line with the England average[48].

[46] Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality. Paragraph 5.8. Available at: www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf [Date accessed: 13/03/25]

[47] DEFRA (2025) Local Authority Collected Waste Statistics for 2023/2024. Available at: www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results [Date accessed: 28/04/25]

[48] DEFRA (2024) Local authority collected waste management - annual results 2022/23. Available at: https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202223#:~:text=In%202022%2F23%2C%20total%20local,per%20cent%20from%202021%2F22 [Date accessed: 13/03/25]

E.7 SA Objective 6: Natural resources

E.7.1 Introduction and context

E.7.1.1 **Boxes E.7.1** to **E.7.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Natural resources.

E.7.1.2 In accordance with the core planning principles of the NPPF, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.

E.7.1.3 The natural resources objective also considers potential effects on mineral resources. Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. Nationally and locally important mineral resources are identified in Mineral Safeguarding Areas (MSAs). There are MSAs located in Medway to the north of the Plan area and running adjacent to the River Medway.

E.7.2 Natural resources receptors

Box E.7.1: *SA Objective 6: Previously developed land / land with environmental value*

Score	Likely Impact - Previously Developed (Brownfield) Land / Land with Environmental Value
-	Development proposals located on previously undeveloped land, or brownfield land with potential environmental value.
+	Development proposals located on previously developed or brownfield land with no environmental value.

Notes
Assessment of sites comprising previously developed land is in accordance with the definitions in the NPPF[49].
It is assumed that mature trees which comprise small sections of brownfield sites will not be felled.
Assessment of current land use and potential environmental value has been made through reference to aerial photography and the use of Google Maps. It should be noted that this may not reflect the current status of the site, and the nature of development within the site boundary is unknown, so a degree of uncertainty remains.

[49] Department for Levelling Up, Housing and Communities (2024) National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Date accessed: 13/03/25]

Box E.7.2: *SA Objective 6: Agricultural Land Classification*

Score	Likely Impact – Agricultural Land Classification
--	Development proposals which are situated on Grade 1, 2 or 3 ALC land comprising 20ha or more.
-	Development proposals which are situated on Grade 1, 2 or 3 ALC land comprising less than 20ha.
0	Development proposals located on previously developed land with no environmental value.
+	Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural'.

Notes
The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as the Best and Most Versatile (BMV) land[50]. In the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land. ALC data is available from Natural England[51]. A 20ha threshold has been used based on Natural England guidance[52].

Box E.7.3: *SA Objective 6: Mineral safeguarding areas*

Score	Likely Impact – Mineral safeguarding areas
-	Development proposals located within an MSA.
0	Development proposals located outside of MSAs.

Notes
Mineral Safeguarding Area (MSA) data has been provided by Medway Council.

[50] MAFF. October 1988. Available at Natural England. http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736 [Date accessed: 13/03/25]

[51] Natural England (2019) Agricultural Land Classification (ALC) (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094 [Date accessed: 13/03/25]

[52] Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: http://publications.naturalengland.org.uk/publication/35012 [Date accessed: 13/03/25]

E.8 SA Objective 7: Housing

E.8.1 Introduction and context

E.8.1.1 **Box E.8.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Housing.

E.8.1.2 This assessment has focused on the capacity of sites for residential development. However, it should also be acknowledged that when striving for sustainable development, housing density should be considered carefully. High population densities can limit the accessibility of local key services and facilities such as hospitals, supermarkets and open spaces, including playgrounds and sports fields. High population densities also influence perceptions of safety, social interactions and community stability[53].

E.8.2 Housing receptors

Box E.8.1: *SA Objective 7: Provision of housing*

Score	Likely Impact - Provision of housing
--	Development proposals which result in a significant net decrease in housing (of 100 dwellings or more).
-	Development proposals which result in a minor net decrease in housing (of between one and 99 dwellings).
0	Development proposals which would not impact housing provision.
+/-	It is uncertain whether the proposed development would result in a net change in housing provision. Residential-led development sites for which the net housing capacity was unknown at the time of writing, or development sites where the proposed use is uncertain but may include residential.
+	Development proposals resulting in a minor net gain in housing (of between one and 99 dwellings).
++	Development proposals resulting in a significant net gain in housing (of 100 dwellings or more).

Notes
Estimated housing capacity for each reasonable alternative site has been provided by Medway Council. At this stage of the assessment process, information is not available relating to the specific housing mix / type that would be delivered through each reasonable alternative site, including potential for development of affordable homes. It is assumed that development options will provide a good mix of housing type and tenure opportunities.

[53] Dempsey. N., Brown. C. and Bramley. G. (2012) The key to sustainable urban development in UK cities? The influence of density on social sustainability. Progress in Planning 77:89-141

E.9 SA Objective 8: Health and wellbeing

E.9.1 Introduction and context

E.9.1.1 **Boxes E.9.1** to **E.9.6** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Health and wellbeing.

E.9.1.2 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the Local Plan should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure facilities and a diverse range of accessible natural habitats and the surrounding PRoW network.

E.9.1.3 Whilst all measurements have been made 'as the crow flies' measurement, where the River Medway presents a physical barrier to the movement of people to healthcare facilities this has been noted within the assessment text.

E.9.1.4 It should be noted that healthcare capacity information has not been available to inform the SA (although ongoing evidence gathering is underway by Medway Council, for example in terms of modelling the healthcare impacts and needs against the current capacity). The SA site assessments under SA Objective 8 are based on accessibility alone and do not necessarily reflect the reality of difficulties in accessing services (for example, a number of GP surgeries are closed to new patients).

E.9.2 Health and wellbeing receptors

Box E.9.1: *SA Objective 8: NHS hospital*

Score	Likely Impact - NHS hospital
-	Development proposals where the entirety or majority of the site is located over 5km from an NHS hospital providing an A&E service.
+	Development proposals where the entirety or majority of the site is located within 5km from an NHS hospital providing an A&E service.

Notes
For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&E service. Distances of sites to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment. NHS hospital department data available from the NHS website[54], and local hospital data provided by Medway Council. The target distance of 5km to an NHS hospital with an A&E service has been used in line with Barton *et al.* sustainable distances[55].

[54] NHS (2023) NHS hospitals overview. Available at: https://www.england.nhs.uk/publication/nhs-provider-directory/ [Date accessed: 13/03/25]

[55] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Box E.9.2: *SA Objective 8: Access to GP surgery*

Score	Likely Impact – Access to GP surgery
-	Development proposals where the entirety or majority of the site is located beyond the sustainable distance of 800m to a healthcare location.
+	Development proposals where the entirety or majority of the site is located within the sustainable distance of 800m to a healthcare location.

Notes
Data for healthcare locations has been provided by Medway Council.

Box E.9.3: *SA Objective 8: Access to leisure facilities*

Score	Likely Impact – Access to leisure facilities
-	Development proposals where the entirety or majority of the site is located beyond the sustainable distance of 1.5km from a leisure facility.
+	Development proposals where the entirety or majority of the site is located within the sustainable distance of 1.5km from a leisure facility.

Notes
Data for leisure facilities has been provided by Medway Council.

Box E.9.4: *SA Objective 8: Access to public greenspace*

Score	Likely Impact - Access to public greenspace
-	Development proposals where the entirety or majority of the site is located over 600m from a public greenspace.
+	Development proposals where the entirety or majority of the site is located within 600m of a public greenspace.

Notes
Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. The assessment of proximity to greenspaces is based on Ordnance Survey Open Greenspaces[56] and open space data provided by Medway Council. It is assumed that these greenspaces are publicly accessible. The target distance of 600m to a public greenspace has been used in line with Barton *et al.* sustainable distances[57].

[56] Ordnance Survey (2023) OS Open Greenspace. Available at: www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace [Date accessed: 13/03/25]

[57] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Box E.9.5: *SA Objective 8: Net loss of public greenspace*

Score	Likely Impact - Net loss of greenspace
-	Development proposals which coincide with, and could potentially result in a net loss of, public greenspace.
0	Development proposals which do not coincide with a public greenspace.

Notes
Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. The assessment of net loss of greenspaces is based on Ordnance Survey Open Greenspaces[58]. It is assumed that these greenspaces are publicly accessible.

Box E.9.6: *SA Objective 8: Access to PRoW / cycle routes*

Score	Likely Impact - Access to PRoW / cycle routes
-	Development proposals where the entirety or majority of the site is located over 600m from a PRoW and cycle route.
+	Development proposals where the entirety or majority of the site is located within 600m from a PRoW and/or cycle route.

Notes
New development sites have been assessed in terms of their access to the local PRoW and cycle networks. PRoW data and cycle networks provided by Medway Council, and England coastal cycle route data is available from Natural England open data[59]. The target distance of 600m to a footpath or cycle path has been used in line with Barton *et al.*[60] sustainable distances.

[58] Ordnance Survey (2024) OS Open Greenspace. Available at https://www.ordnancesurvey.co.uk/products/os-open-greenspace [Date accessed: 13/03/25]

[59] Natural England Open Data Publication (2023). English Coast Path Route. Available at: https://www.data.gov.uk [Date accessed: 13/03/25]

[60] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

E.10 SA Objective 9: Cultural heritage

E.10.1 Introduction and context

E.10.1.1 **Boxes E.10.1** to **E.10.6** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 9: Cultural heritage.

E.10.1.2 Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Grade I, II* and II Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), and Conservation Areas (CA).

E.10.1.3 It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development (unless otherwise specified in the Local Plan). Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets[61] that are important components of the local area. Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.

E.10.1.4 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets.

E.10.1.5 Heritage assets identified on Historic England's Heritage at Risk Register may be identified as being at risk for a number of reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment[62]. Where Heritage at Risk assets could potentially be impacted by the proposed development at a site, this has been stated.

E.10.1.6 It should be noted that not all of Medway's historic environment resource and heritage assets are subject to statutory designations; non-designated features comprise a significant aspect of heritage, which is often experienced on a daily basis. This may include buildings and other features of historic interest which are not listed, as well as both discovered and undiscovered archaeological remains.

E.10.1.7 It is anticipated that Medway Council will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.

[61] Setting is taken to mean the surroundings in which a heritage asset may be experienced, which does not relate solely to distance from proposed developments to heritage assets. Historic England (2017) The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning: 3 (2nd Edition). Available at: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ [Date accessed: 13/03/25]

[62] Historic England (2025) Search the Heritage at Risk Register. Available at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/ [Date accessed: 13/03/25]

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E.10.2 Cultural heritage receptors

Box E.10.1: *SA Objective 9: Grade I Listed Buildings*

Score	Likely Impact – Grade I Listed Buildings
--	Development proposal coincides with, is adjacent to, or could significantly impact the setting of, a Grade I Listed Building.
-	Development proposal located within the wider setting of a Grade I Listed Building.
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
+	Development proposal which could potentially enhance a Grade I Listed Building or its setting.

Notes
Grade I Listed Buildings are considered to be those of exceptional interest. Data available from Historic England[63].

Box E.10.2: *SA Objective 9: Grade II* Listed Buildings*

Score	Likely Impact - Grade II* Listed Buildings
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.
-	Development proposal located adjacent to, or within the setting of a Grade II* Listed Building.
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.

Notes
Grade II* Listed Buildings are considered to be those of more than special interest. Data sourced from Historic England[64].

[63] Historic England (2024) Download Listing Data: Listed Buildings as points. Available at: https://opendata-historicengland.hub.arcgis.com/datasets/historicengland::national-heritage-list-for-england-nhle/explore?layer=0&location=52.634596%2C-2.508121%2C5.37 [Date accessed: 13/03/25]

[64] Ibid

Box E.10.3: *SA Objective 9: Grade II Listed Buildings*

Score	Likely Impact - Grade II Listed Buildings
--	Development proposal coincides with a Grade II Listed Building.
-	Development proposal located adjacent to, or within the setting of, a Grade II Listed Building.
0	Development proposal not considered likely to impact a Grade II Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II Listed Building or its setting.

Notes
Grade II Listed Buildings are considered to those of special interest. Data sourced from Historic England[65].

Box E.10.4: *SA Objective 9: Scheduled Monuments*

Score	Likely Impact - Scheduled Monuments
--	Development proposal coincides with an SM.
-	Development proposal is adjacent to, or located within the setting of, an SM.
0	Development proposal not considered to impact an SM or its setting.
+	Development proposal which could potentially enhance an SM or its setting.

Notes
Scheduling is the selection of a sample of nationally important archaeological sites. Data sourced from Historic England[66].

Box E.10.5: *SA Objective 9: Registered Parks and Gardens*

Score	Likely Impact - Registered Parks and Gardens
--	Development proposal coincides with an RPG.
-	Development proposal is adjacent to, or located within the setting of, an RPG.
0	Development proposal not considered likely to impact an RPG or its setting.
+	Development proposal which could potentially enhance an RPG or its setting.

Notes
The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection. Data sourced from Historic England[67].

[65] Ibid

[66] Historic England (2025) Download Listing Data: Scheduled Monuments. Available at: https://opendata-historicengland.hub.arcgis.com/datasets/historicengland::national-heritage-list-for-england-nhle/explore?layer=6 [Date accessed: 13/03/25]

[67] Historic England (2025) Download Listing Data: Registered Parks and Gardens. Available at: https://opendata-historicengland.hub.arcgis.com/datasets/historicengland::national-heritage-list-for-england-nhle/explore?layer=7 [Date accessed: 13/03/25]

Box E.10.6: *SA Objective 9: Conservation Areas*

Score	Likely Impact - Conservation Areas
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area.
0	Development proposal not considered to impact a Conservation Area or its setting.
+	Development proposals which could potentially enhance the character or setting of a Conservation Area.

Notes
Conservation Area data sourced from Historic England. Information on Medway's conservation areas is available online[68].

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[68] Medway Council (2024) Conservation areas and listed buildings. Available at: https://www.medway.gov.uk/info/200147/applying_for_planning_permission/129/conservation_areas_and_listed_buildings [Date accessed: 13/03/25]

E.11 SA Objective 10: Transport and accessibility

E.11.1 Introduction and context

E.11.1.1 **Boxes E.11.1** to **E.11.4** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Transport.

E.11.1.2 The Local Plan should seek to ensure that residents in Medway have access to a range of sustainable transport modes, to help facilitate a modal shift away from private car use to help tackle air quality and congestion issues and provide for more efficient travel. The Plan should also promote a reduced need to travel overall, facilitating local journeys via active travel wherever possible.

E.11.2 Transport receptors

Box E.11.1: *SA Objective 10: Bus stop*

Score	Likely Impact – Bus stop
-	Development proposals where the entirety or majority of the site is located over 400m from a bus stop.
0	Development proposals where the site use does not require access to transport.
+	Development proposals where the entirety or majority of the site is located within 400m of a bus stop.

Notes
It is desirable for site end users to be situated within walking distance of a bus stop with access to frequent services. A target distance of 400m to a bus stop has been used in line with Barton *et al*. sustainable distances[69].
Bus service frequency and destination information was obtained from Google Maps[70]. Bus stop data has been provided by Medway Council.

[69] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

[70] Live departure boards available from Google Maps have been used to assess the frequency of services at bus stops within the Plan area. These are obtained from local bus timetables.

Box E.11.2: *SA Objective 10: Railway station*

Score	Likely Impact – Railway station
-	Development proposals where the entirety or majority of the site is located over 2km from a railway station
0	Development proposals where the site use does not require access to transport.
+	Development proposals where the entirety or majority of the site is located within 2km of a railway station
++	Development proposals that include the development of a new railway station

Notes
Railway station data has been provided by Medway Council. A target distance of 2km to a railway station has been used in line with Barton *et al*. sustainable distances[71].

Box E.11.3: *SA Objective 10: Pedestrian or cycle access*

Score	Likely Impact – Pedestrian or cycle access
-	Development proposals located in areas which currently have poor access to the surrounding pedestrian and/or cycle network.
0	Development proposals where the site use does not require access to transport.
+	Development proposals which are well connected to the existing pedestrian and/or cycle network and would be expected to provide safe access for pedestrians and/or cyclists.

Notes
New development sites have been assessed in terms of their access to the surrounding pedestrian and cycle networks, allowing for safe local travel on foot or bicycle. Safe access is determined to be that which is suitable for wheelchair users and pushchairs. Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps. PRoW data and cycle networks provided by Medway Council, and England coastal cycle route data is available from Natural England open data[72].

[71] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

[72] Natural England Open Data Publication (2023). English Coast Path Route. Available at: : https://www.data.gov.uk [Date accessed: 13/03/25]

Box E.11.4: *SA Objective 10: Access to local services*

Score	Likely Impact – Access to local services
-	Development proposals where the entirety or majority of the site is located beyond 600m to local services.
0	Development proposals where the site use does not require access to transport.
+	Development proposals where the entirety or majority of the site is located within 600m to local services.

Notes
Data on local services has been provided by Medway Council. In accordance with Barton *et al*'s sustainable distances[73], development that is located within 600m of a local service, such as a post office or a local shop, it expected to be able to provide site end users with access to essential services.

Box E.11.5: *SA Objective 10: Public transport nodes*

Score	Likely Impact – Public transport nodes
0	Development proposals where the site is located beyond 300m from a high-frequency bus stop and 800m of a rail station.
++	Development proposals where any proportion of the site is located within 300m of a bus stop with high-frequency services, and within an 800m walk to a rail station.

Notes
Data on public transport nodes has been provided by Medway Council in the form of a mapped isochrone. A 300m buffer has been used as the crow flies to indicate the proximity to high-frequency bus stop. The 800m walk to a rail station has been calculated using the road network.

[73] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability.

E.12 SA Objective 11: Education

E.12.1 Introduction and context

E.12.1.1 **Boxes E.12.1** to **E.12.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Education.

E.12.1.2 It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills and qualifications of residents.

E.12.1.3 It should be noted that school capacity information has not been available; the assessment is based on accessibility alone.

E.12.1.4 Whilst all measurements have been made 'as the crow flies', where the River Medway presents a physical barrier to the movement of people to schools this has been noted within the assessment text.

E.12.2 Education receptors

Box E.12.1: *SA Objective 11: Access to primary school*

Score	Likely Impact - Access to primary school
-	Residential development proposals where the entirety or majority of the site is located beyond 800m to a primary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the entirety or majority of the site is located within 800m to a primary school.
++	Development proposals that include the development of a new primary school.

Notes
Data for primary school locations has been provided by Medway Council. In line with Barton *et al.*'s sustainable distances[74], for the purpose of this assessment, 800m is assumed to be the target distance for travelling to a primary school. It is recognised that not all schools within Medway are accessible to all pupils. For instance, independent, academically selective schools, and single sex schools may not be accessible to all. This has been considered within the assessment with distances drawn to state funded non-selective schools, or where development proposals are located in areas with sustainable access to schools providing for both sexes.

[74] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

Box E.12.2: *SA Objective 11: Access to secondary school*

Score	Likely Impact - Access to secondary school
-	Residential development proposals where the entirety or majority of the site is located beyond 1.5km to a secondary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the entirety or majority of the site is located within 1.5km to a secondary school.
++	Development proposals that include the development of a new secondary school.

Notes
Data for secondary school locations has been provided by Medway Council. In line with Barton et al.'s sustainable distances[75], for the purpose of this assessment, 1.5km is assumed to be the target distance for travelling to a secondary school.

Box E.12.3: *SA Objective 11: Access to further education*

Score	Likely Impact – Access to further education
0	Development proposals for non-residential use, or residential proposals located outside 3km distance to further educational facility.
+	Residential development proposals where the entirety or majority of the site is located within 3km to a further educational facility.

Notes
Data for further educational facilities has been provided by Medway Council, including universities and colleges. In line with Barton et al.'s sustainable distances[76], for the purpose of this assessment, 3km is assumed to be the target distance for travelling to a further educational facility.

[75] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

[76] Ibid.

E.13 SA Objective 12: Economy and employment

E.13.1 Introduction and context

E.13.1.1 **Boxes E.13.1** to **E.13.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Economy.

E.13.1.2 Major employment areas have been defined by Medway Council and include the following. Please note that no site visits have been undertaken to identify all employment areas within Medway, and that the following list does not include town centres and major retail centres:

- Ballard Business Park
- Beechings Way (excluding mixed use areas)
- Bloors Lane
- Castleview Business Centre
- Chatham Port and Pier Road Gillingham
- Cloverlay
- Courteney Road, Gillingham
- Cuxton Industrial Estate
- Elm Court
- Fenn Street
- Firmstart Estate Twydall
- Formby Road, Halling
- Fort Horsted
- Frindsbury Peninsula (Medway City Estate)
- Gads Hill/Danes Hill, Gillingham
- Gillingham Business Park
- Hopewell Drive, Luton
- Innovation Park Medway
- Isle of Grain/Thamesport
- Jenkins Dale
- Kingsnorth
- Laker Road Industrial Estate
- Lordswood Industrial Estate
- Medway Valley Park Estate
- Otterham Quay
- Railway Street Industrial Park
- Rochester Airfield
- Second Avenue, Luton
- Temple Industrial Estate
- Thameside Terminal
- Vicarage Lane, Hoo
- West of Bailey Drive, Gillingham Business Park

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E.13.2 Economy receptors

Box E.13.1: *SA Objective 12: New residents' access to major employment location*

Score	Likely Impact – New residents' access to major employment location
-	Residential development proposals where the entirety or majority of the site is located over 5km from a major employment location.
0	Development proposals for non-residential use.
+	Residential development proposals where the entirety or majority of the site is located within 5km of a primary employment location.

Notes
It is assumed that, in line with Barton *et al*.'s sustainable distances[77], new residents should be situated within 5km of key employment areas to ensure they have access to a range of employment opportunities capable of meeting their needs. Data for primary employment locations has been provided by Medway Council.

Box E.13.2: *SA Objective 12: Employment floorspace*

Score	Likely Impact - Employment floorspace
--	Development proposals which result in a significant net decrease in employment floorspace.
-	Development proposals which result in a minor net decrease in employment floorspace.
0	Development proposals which would not impact employment floorspace.
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace. This includes development sites where the proposed use is uncertain but may include employment. This additionally includes sites proposed for mixed-use development, these sites have all been assessed as uncertain under this receptor.
+	Development proposals which result in a minor net increase in employment floorspace.
++	Development proposals which result in a significant net increase in employment floorspace.

Notes
An assessment of current land use has been made through reference to aerial photography and the use of Google Maps. Residential sites which could potentially result in the loss of between 0.1ha and 0.99ha of employment floorspace would be expected to have a minor negative impact and loss of 1ha or more would be expected to have a major negative impact.

[77] Ibid.

Appendix F: Reasonable Alternative Strategic Site Assessments

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F.1 Introduction

F.1.1 Overview

F.1.1.1 This document presents the assessment of 27 reasonable alternative strategic sites that have been identified by Medway Council during the Sustainability Appraisal (SA) process to date alongside the preparation of the Medway Local Plan (MLP).

F.1.1.2 This includes 24 reasonable alternative strategic sites which were evaluated within the Regulation 18 Interim SA (2024)[1] at the previous stage of plan making. Since the Regulation 18 stage, the Council has identified two new reasonable alternative strategic sites (Sites SR53 and RN9). Additionally, the Council has merged two strategic sites (Sites HHH22 and HHH31) to be assessed as one reasonable alternative strategic site.

F.1.1.3 The Council has provided updated capacity information for six strategic sites (Sites CHR4, HHH12, HH3, LW6, LW8 and SMI6) taking into account the latest information from the Land Availability Assessment.

F.1.1.4 The assessments presented within this document therefore supersede the assessment information presented in Appendix D of the Regulation 18 Interim SA Report.

F.1.1.5 Strategic residential-led sites are considered to be those which comprise at least 10ha and could deliver at least 500 new homes (or at least 300 homes for sites in Allhallows, Lower Stoke and Middle Stoke, reflecting the scale of growth in these smaller villages). Strategic employment-led sites are considered to be those which comprise over 75ha.

F.1.1.6 The location of the 27 strategic sites is shown in **Figure F.1.1**, and their potential uses are identified in **Table F.1.1.**

F.1.1.7 Each of the sites appraised within this report have been assessed for likely impacts on each of the 12 SA Objectives, as outlined in the SA Framework (see **Appendix B**). Likely sustainability impacts have been set out in **Tables F.2.1 – F.13.1** within each SA Objective chapter, in accordance with the site assessment methodology set out in **Appendix E**, as well as the methodology information set out in **Chapter 4** of the main SA Report.

F.1.1.8 Due to their large scale and capacity, strategic sites are often capable of providing a range of supporting infrastructure alongside the core land use. Many are accompanied by masterplans that present a proposed layout and location of different land uses within the red line boundary, as well as evidence which underpins proposals at the site. Wherever this information has been available, it has been used to help inform the SA process. The availability of site-specific information varies across the different reasonable alternatives, and where appropriate, the assessment process has made it clear that SA performance varies in relation to the quality of the baseline.

F.1.1.9 All assessments remain at a high level and rely on available secondary data provided by the Council.

[1] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 10/04/25]

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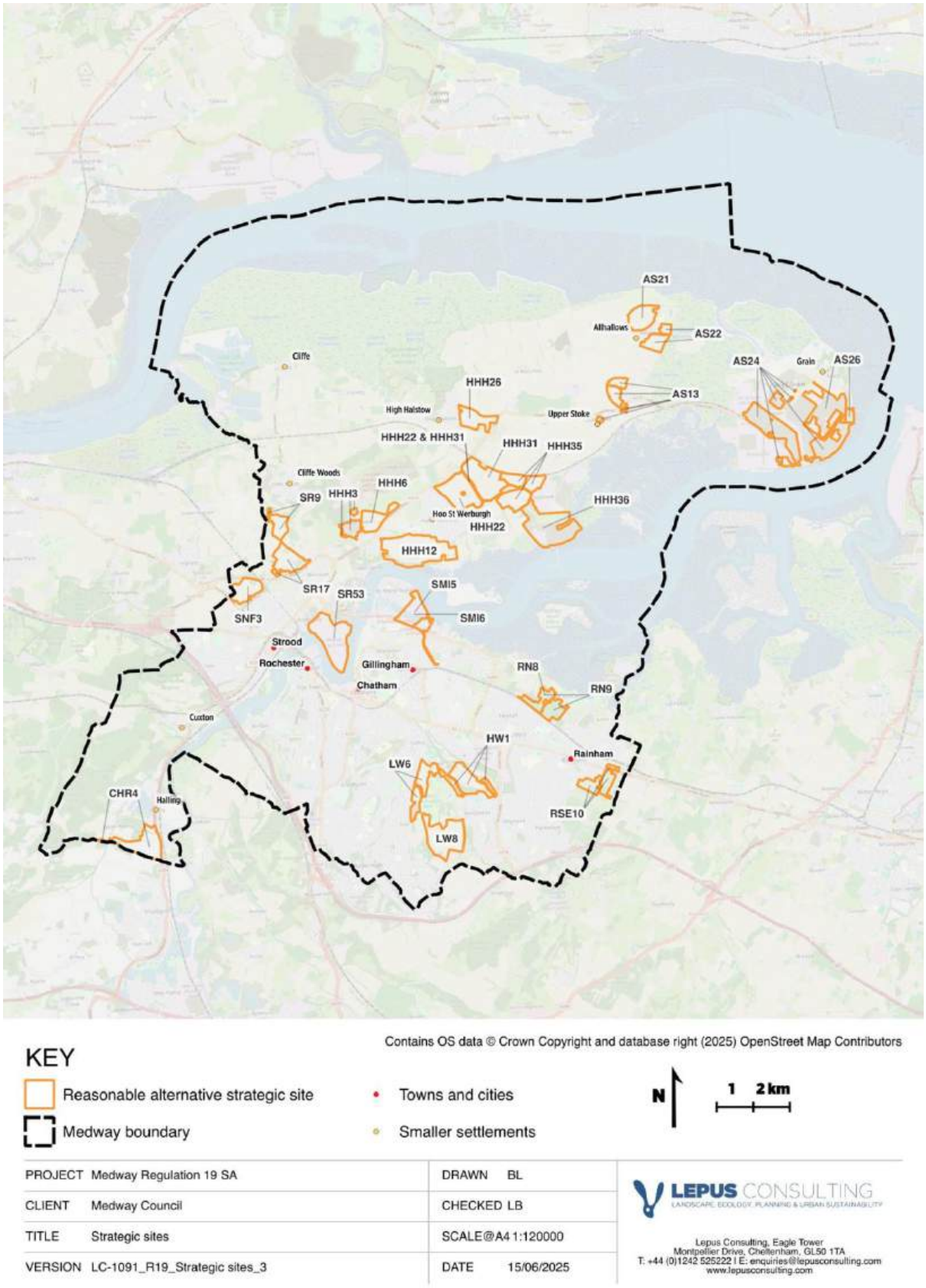

Figure F.1.1: *Location of the 27 reasonable alternative strategic sites identified in Medway*

Table F.1.1: *Reasonable alternative strategic sites in Medway (changes at R19 stage shaded blue)*

No.	Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity	Change since Regulation 18
1	AS13	All Saints	Residential led (mixed-use)	32.73	368	Unchanged
2	AS21	All Saints	Residential led (mixed-use)	41.62	390	Unchanged
3	AS22	All Saints	Residential led (mixed-use)	32.68	300	Unchanged
4	AS24	All Saints	Non-residential	158.60	0	Unchanged
5	AS26	All Saints	Non-residential	85.25	0	Unchanged
6	CHR4	Cuxton, Halling & Riverside	Residential led (mixed-use)	63.12	1,000	Capacity updated
7	HHH12	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	131.27	1,801	Capacity updated
8	HHH22	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	72.77	1,500	Unchanged
9	HHH22/HHH31	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	170.87	1,700	New (merged) site
10	HHH26	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	39.81	760	Unchanged
11	HHH3	Hoo St Werburgh & High Halstow	Residential led	23.83	400	Capacity updated
12	HHH31	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	79.58	2,000	Unchanged
13	HHH35	Hoo St Werburgh & High Halstow	Non-residential	76.00	0	Unchanged
14	HHH36	Hoo St Werburgh & High Halstow	Non-residential	114.11	0	Unchanged
15	HHH6	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	35.32	550	Unchanged
16	HW1	Hempstead & Wigmore	Residential led	67.44	500	Unchanged
17	LW6	Lordswood & Walderslade	Residential led	46.80	698	Capacity updated
18	LW8	Lordswood & Walderslade	Residential led	87.79	2,000	Capacity updated
19	RN8	Rainham North	Residential led (mixed-use)	24.86	500	Unchanged
20	RN9	Rainham North	Residential led	51.23	800	Unchanged
21	RSE10	Rainham South East	Residential led (mixed-use)	41.58	850	Unchanged
22	SMI5	St Marys Island	Non-residential	42.41	0	Unchanged
23	SMI6	St Marys Island	Residential led (mixed-use)	57.71	2,200	Capacity updated
24	SNF3	Strood North & Frindsbury	Residential led	39.02	800	Unchanged
25	SR17	Strood Rural	Residential led (mixed-use)	48.70	900	Unchanged
26	SR9	Strood Rural	Residential led (mixed-use)	27.07	792	New site
27	SR53	Strood Rural	Residential led (Mixed-use opportunity area)	31.91	690	New site

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F.2 SA Objective 1: Climate change mitigation

F.2.1 Potential increase in carbon footprint

F.2.1.1 The estimated CO_2 emissions for Medway in 2022 was 753.9 kilo tonnes, with per capita emissions of 2.7 tonnes, according to UK local authority CO_2 emissions data[2]. It is likely that new development as a result of the MLP will result in an increase in local greenhouse gas (GHG) emissions due to the increase in population and the number of operating businesses.

F.2.1.2 This increase in GHG emissions can be associated with the construction phase, the occupation and operation of homes and businesses, energy and water consumption and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible.

F.2.1.3 The incorporation of green infrastructure (GI) presents several opportunities to mitigate climate change, for example through providing natural cooling to combat the 'urban heat island' effect, reducing the impacts of air pollution and encouraging active travel through the provision of more attractive places[3]. Accompanying masterplans, and/or information provided by the Council indicate that 18 of the 27 strategic sites will provide GI which is expected to help offset climate change impacts to some extent. The remaining nine sites may also have GI opportunities, but this information is not available at the time of writing. Additionally, the majority of sites (24) are likely to provide access to a range of sustainable transport options (See **Chapter F.11 – SA Objective 10**), potentially helping to reduce congestion and associated transport related emissions.

F.2.1.4 Overall, the appraisal of all reasonable alternatives strategic sites is limited in its assessment of carbon emissions, due to an absence of site-specific carbon footprint data. Furthermore, the nature and scale of non-residential development is unknown at this stage, and any potential for new development to draw on renewable or low-carbon energy supply is unknown. Consequently, the carbon emissions likely to be generated as a result of development is currently uncertain.

F.2.1.5 Several sites include strategies to reduce carbon emissions related with the proposed development, such as energy efficient design. However, the nature and scale of these strategies is unknown at the time of writing and are unlikely to significantly reduce the overall impact on GHG emissions of these larger sites.

[2] Department for Energy Security and Net Zero (2024) UK local authority and regional carbon dioxide emissions national statistics: 2005-2022. Available at: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022 [Date accessed: 22/04/25]

[3] TCPA (2023) What is Green Infrastructure? Available at: www.tcpa.org.uk/what-is-green-infrastructure/ [Date accessed: 10/04/25]

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Table F.2.1: *Strategic sites impact matrix for SA Objective 1 – Climate change mitigation*

Site ref	Proposed site use	Climate change mitigation
AS13	Residential led (mixed-use)	+/-
AS21	Residential led (mixed-use)	+/-
AS22	Residential led (mixed-use)	+/-
AS24	Non-residential	+/-
AS26	Non-residential	+/-
CHR4	Residential led (mixed-use)	+/-
HHH12	Residential led (mixed-use)	+/-
HHH22	Residential led (mixed-use)	+/-
HHH22/HHH31	Residential led (mixed-use)	+/-
HHH26	Residential led (mixed-use)	+/-
HHH3	Residential led	+/-
HHH31	Residential led (mixed-use)	+/-
HHH35	Non-residential	+/-
HHH36	Non-residential	+/-
HHH6	Residential led (mixed-use)	+/-
HW1	Residential led	+/-
LW6	Residential led	+/-
LW8	Residential led	+/-
RN8	Residential led (mixed-use)	+/-
RN9	Residential led	+/-
RSE10	Residential led (mixed-use)	+/-
SMI5	Non-residential	+/-
SMI6	Residential led (mixed-use)	+/-
SNF3	Residential led	+/-
SR17	Residential led (mixed-use)	+/-
SR9	Residential led (mixed-use)	+/-
SR53	Residential led (mixed-use opportunity area)	+/-

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F.3 SA Objective 2: Climate change adaptation

F.3.1 Fluvial flood zones

F.3.1.1 Parts of the MLP area are highly susceptible to fluvial and tidal flooding due to its coastal location where the Medway and Stour confluence and join the Thames. The River Medway runs from west to east through the centre of the Plan area. Flood Zones 2 and 3 are most prominent along Thames Estuary and the Medway Estuary, encompassing the north west and east of the Hoo Peninsula. Smaller areas of flood risk branch off into urban areas in the south of the Plan area.

F.3.1.2 The majority of the strategic sites (16) are located wholly in Flood Zone 1. Development at these locations is expected to have a minor positive impact on flooding, as the proposed development at these sites is likely to locate site end users away from areas at risk of fluvial flooding.

F.3.1.3 Some 11 sites are largely or partially located within Flood Zone 2 and 3. Site AS24 and HHH36 wholly coincide with Flood Zones 2 and 3, with 95% of Site AS24 and 90% of Site HHH3 within Flood Zone 3. The remaining nine sites contain varying proportions of land within Flood Zone 2 and 3; this includes 73% of Site AS26, 70% of Site SMI5 and 69% of Site SMI6 lying in Flood Zone 3, and smaller proportions of the remaining sites (27% of Site AS22, 12% of Site HHH35, 4% of Sites HHH31 and HHH22/HHH31 and 3% of Site AS13).

F.3.1.4 Accompanying masterplans and/or Council provided information indicates that five of the 11 sites (AS13, AS22, HHH36, SMI5 and SMI6) located within Flood Zone 3 will incorporate measures to reduce the risk of flooding, including the provision of sustainable drainage systems (SuDs) and GI. Despite these flood prevention strategies, development at all 11 sites has the potential to result in a major negative impact on flooding in the area, with over a 1% chance of river flooding or over a 0.5% chance of sea flooding in any given year. Site end users at these sites could potentially be located in areas at high risk of fluvial flooding.

F.3.1.5 Site SR53 comprises the Medway City Estate and is identified by Medway Council as a potential 'opportunity area'. Based on the entire site boundary, 32% of the site area lies within Flood Zone 3 and 38% within Flood Zone 2. However, the Council has indicated that the entirety of the site area would not be redeveloped. Furthermore, the Environment Agency's response to the Council's Regulation 18 consultation noted the need for a strategic approach to 'flood cells'. The Medway City Estate is one such potential location where allowing controlled flooding may help to protect other areas of Medway. Therefore, based on the current available information the impact of the potential development at Site SR53 on flooding is uncertain.

F.3.2 Surface water flood risk

F.3.2.1 Surface water flood risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. Areas affected by surface water flooding can be found throughout Medway, in particular

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along roads, as well as within urban parkland, and associated with ponds and watercourses.

F.3.2.2 Some 15 strategic sites coincide with an area of high SWFR, where there is potential for significant adverse effects associated with the location of site end users in areas of high flood risk and potential to exacerbate SWFR in surrounding locations. According to supplementary information provided by the Council, eight strategic sites (AS13, AS22, CHR4, HW1, SMI5, SMI6, SNF3 and SR17) will include measures which may help to reduce the risk of surface water flooding, including the provision of SuDs and GI, that prevents runoff by capturing rainwater, allowing it to filter into the earth where it can be stored and reused. The measures included alongside the proposed development at these eight sites will help to reduce SWFR, although there remains potential for a minor negative impact on surface water flooding. A potential major negative impact is identified as a result of the proposed development at the five sites (AS21, HHH22, HHH31, HHH35 and HHH6) where no specific flood prevention strategies or GI measures are mentioned.

F.3.2.3 Additionally, a further nine sites (AS24, AS26, HHH12, HHH26, HHH3, HHH36, LW8, RN8 and SR53) coincide with areas of low and/or medium SWFR. Accompanying masterplans and/or Council provided information indicates that five of these sites (HHH26, HHH3, HHH36, LW8 and RN8) provide measures to reduce the risk of surface water flooding, including the provision of SuDs and GI. The measures included alongside the proposed development at these five sites will help to reduce surface water flood risk and are identified to have a negligible impact on surface water flooding. The remaining three sites (AS24, AS26 and HHH12) that do not include any measures to reduce SWFR could potentially have a minor negative impact on surface water flooding in the area.

F.3.2.4 The remaining three sites (LW6, RSE10 and SR9) which do not coincide with any significant areas of SWFR are identified to have a negligible impact on surface water flooding.

F.3.3 Flood defences

F.3.3.1 The Environment Agency has defined a number of flood defence schemes for the Thames, Medway and Swale Estuaries[4] [5]. Development coincident with these schemes, or within 20m of the toe of a proposed/existing flood defence, is considered unlikely to be able to safeguard the viability of future flood defences and has potential to result in a major negative impact on climate change adaptation in the MLP area.

F.3.3.2 Seven of the strategic sites (AS24, AS26, HHH12, HHH36, SMI5, SMI6 and SR53) coincide with, or lie within 20m of, existing flood defence schemes. The accompanying masterplan for Site HHH36 indicates a green space buffer around the site that will ensure no built development occurs within 20m of the flood defence. Therefore, a negligible impact is identified for Site HHH36. The proposed development at Sites AS24, AS26, HHH12, SMI5 and SMI6 could potentially result in a major negative impact on the viability of flood defences, in the absence of further information regarding the site layout.

[4] Environment Agency (2023) Thames Estuary 2100 (TE2100). Available at: www.gov.uk/government/publications/thames-estuary-2100-te2100 [Date accessed: 10/04/25]

[5] Environment Agency (2024) Medway Estuary and Swale flood and coastal risk management strategy. Available at: www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy [Date accessed: 10/04/25]

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F.3.3.3 As noted in **paragraph F.3.1.5**, the proposed development at Site SR53 has potential to include strategic flood schemes that may lead to longer term benefits, although based on current infrastructure, the site is surrounded by existing defences. At the time of writing, the implications of development at this location on the viability of current and future flood defences is uncertain.

F.3.3.4 The remaining 20 strategic sites do not coincide or lie within 20m of flood defence schemes and are likely to have a negligible impact on flood defences.

Table F.3.1: *Strategic sites impact matrix for SA Objective 2 – Climate change adaptation*

Site ref	Proposed site use	Fluvial flooding	Surface water flooding	Flood defences
AS13	Residential led (mixed-use)	--	-	0
AS21	Residential led (mixed-use)	+	--	0
AS22	Residential led (mixed-use)	--	-	0
AS24	Non-residential	--	-	--
AS26	Non-residential	--	-	--
CHR4	Residential led (mixed-use)	+	-	0
HHH12	Residential led (mixed-use)	+	-	--
HHH22	Residential led (mixed-use)	+	--	0
HHH22/HHH31	Residential led (mixed-use)	--	--	0
HHH26	Residential led (mixed-use)	+	0	0
HHH3	Residential led	+	0	0
HHH31	Residential led (mixed-use)	--	--	0
HHH35	Non-residential	--	--	0
HHH36	Non-residential	--	0	0
HHH6	Residential led (mixed-use)	+	--	0
HW1	Residential led	+	-	0
LW6	Residential led	+	0	0
LW8	Residential led	+	0	0
RN8	Residential led (mixed-use)	+	0	0
RN9	Residential led	+	--	0
RSE10	Residential led (mixed-use)	+	0	0
SMI5	Non-residential	--	-	--
SMI6	Residential led (mixed-use)	--	-	--
SNF3	Residential led	+	-	0
SR17	Residential led (mixed-use)	+	-	0
SR9	Residential led (mixed-use)	+	0	0
SR53	Residential led (mixed-use opportunity area)	+/-	-	+/-

F.4 SA Objective 3: Biodiversity and geodiversity

F.4.1 European sites

F.4.1.1 European sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). A 6km Zone of Influence (ZOI) has been applied to the Medway and Thames Estuary and Marshes SPA and Ramsar sites as informed by the emerging HRA[6]. A 7km buffer has been applied to the North Downs Woodland SAC on the basis of visitor survey work[7] carried out at Boxley Warren Local Nature Reserve (LNR). A 400m zone has also been applied to all European sites on the basis of urbanisation concerns.

F.4.1.2 According to the red line boundaries provided by the Council, Sites AS24, AS26 and HHH36 slightly coincide with Medway Estuary and Marshes SPA and Ramsar site. Accompanying masterplans and/or information provided by the Council indicate that Site HHH36 will include green buffers and ecological enhancement corridors, and Site AS26 will include restricted development areas. These measures will therefore ensure the built development is not coincident with the SPA and Ramsar designations; however, the proposed development at the two sites would still be located within 400m of the European sites. Six other sites (AS22, AS13, HHH12, HHH36, RN8 and RN9) are also located within 400m of a European site, although the indicative masterplan for Site AS22 includes open space, ecological enhancements and green buffers. Development at all eight sites (AS13, AS22, AS24, AS26, HHH12, HHH36, RN8 and RN9) located within 400m of a European site could potentially result in a major negative impact, due to the likelihood of threats and pressures arising from the construction and occupation of new development in such close proximity to the designated sites, including urbanisation impacts to the designations themselves and functionally linked land.

F.4.1.3 The remaining 19 sites are located within one or more of the identified recreational ZOIs, and could cumulatively give rise to adverse effects associated with air and water pollution. A minor negative impact is identified for these sites.

F.4.1.4 The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.4.2 Sites of Special Scientific Interest

F.4.2.1 There are seven Sites of Special Scientific Interest (SSSIs) located within Medway. Five reasonable alternative strategic sites coincide with a SSSI (a small proportion of Sites HHH12, HHH36, AS24 and AS26 with 'Medway Estuary and Marshes' SSSI, and a small proportion of Sites HHH3 with 'Chattenden Woods and Lodge Hill' SSSI). Development at these sites has the potential to lead to direct adverse impacts associated with loss or degradation of the habitat found within the SSSIs; additionally, Site HHH3 could potentially lead to increased disturbance to the ground-nesting nightingales found at Chattenden

[6] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan: Regulation 19 HRA Report

[7] Maidstone Borough Council (2012) Boxley Warren Local Nature Reserve Visitor Surveys. Main Results Tabulations by Location of Interview.

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Woods and Lodge Hill SSSI. The accompanying masterplans for Site AS24 include 207 acres identified for 'environmental mitigation' and Site AS26 includes a restricted development area. Site HHH3 indicates that development will retain tree cover at 'Rams Bottom Wood', creating open space to provide an alternate natural space away from the protected SSSI as a space to gather for social interaction and community engagement. The measures included in the accompanying masterplans for Sites AS24, AS26 and HHH3 will be likely to reduce the potential for adverse effects on the SSSIs, although site-specific assessments are likely to be needed to confirm opportunities to avoid or mitigate effects arising from new development. Two further sites (SMI5 and SMI6) lie adjacent to 'Medway Estuary and Marshes' SSSI. Development at these seven sites could potentially result in a major negative impact on an SSSI, due to the increased likelihood of direct impacts on the features for which the SSSIs are designated.

F.4.2.2 Natural England have developed Impact Risk Zones (IRZs) for each SSSI in the country, in order to allow for a rapid assessment of the potential risks posed by development proposals. The remaining sites (20) fall within an IRZ which indicates that consultation may be required with Natural England owing to the type of development proposed, reflected in the assessments at this stage as a potential minor negative impact. This includes IRZs which indicate strategic solutions are in place to address potential recreational impacts arising from new development. Accompanying site masterplans and information provided by the Council indicates that 14 of these 20 sites will include GI and ecological enhancements such as green corridors and woodland planting. The measures included within the development proposals could help to reduce adverse effects on SSSIs. However, this would need to be confirmed through consultation with Natural England and more detailed site appraisals to understand the sensitivities of surrounding SSSIs and potential impacts arising from new development.

F.4.3 National Nature Reserves

F.4.3.1 High Halstow National Nature Reserve (NNR) is located in the north of Medway, and the North Kent Woods and Downs NNR partially overlaps with the south west of Medway. No strategic sites coincide or lie adjacent with an NNR. Three sites (HHH22/HHH31, HHH26 and HHH31) in close proximity (within approximately 2km) of High Halstow NNR, whilst Site CHR4 lies in close proximity to the North Kent Woods and Downs NNR. These four sites are identified as having potential to lead to a minor negative impact due to increased pressures from development. Direct impacts such as increased footfall could lead to habitat fragmentation, vegetation damage, soil compaction, and disturbances to sensitive wildlife species.

F.4.3.2 The 23 remaining sites are located at a greater distance from NNRs, where development is less likely to affect NNRs. A negligible impact is identified.

F.4.4 Ancient woodland

F.4.4.1 Medway is home to various areas of ancient woodland, including 'Great Chattenden Wood' and 'Red/Stonyfield Woods'. A large proportion of Site HHH12 (approximately 11.3ha) coincides with 'Cockham Wood' ancient woodland, potentially resulting in a direct major negative impact from development, including habitat loss and fragmentation.

F.4.4.2 Site HW1 coincides with the entirety of 'Grove Wood', and Sites LW6 and LW8 coincide with sections of unnamed ancient woodland. The accompanying masterplans to these

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three sites indicate that the proposed development at the sites will not result in the loss of ancient woodland; however, these measures are not expected to fully address the potential minor negative impacts, including from pollution and recreational pressures.

F.4.4.3 Site HHH26 lies adjacent to 'Fishers Wood' and an additional three sites (CHR4, HHH6 and SR9) are located in close proximity to ancient woodland, potentially having a minor negative impact in the form of direct or indirect impacts, including from pollution and recreational pressures.

F.4.4.4 Site CHR4 is proposed for the development of 1,100 dwellings and is located within 1km from 'Red/Stonyfield Woods'. The accompanying masterplan to Site CHR4 includes large areas of open space to retain the area of ancient woodland and additionally includes the potential for a new country park, which will help to ensure recreational pressures on the ancient woodland are redirected. Therefore, it is likely that the development will result in an overall negligible impact on the ancient woodland.

F.4.4.5 The remaining 19 strategic sites are located away from areas of ancient woodland, and are therefore likely to result in a negligible impact on this biodiversity asset.

F.4.5 Local Nature Reserves

F.4.5.1 There are eight Local Nature Reserves (LNR) in Medway including 'Darland Banks' and 'Rede Common', all located in the south of Medway. No sites coincide with an LNR, however Site HW1 lies adjacent to Darland Banks LNR and Sites LW6 and LW8 lie in close proximity to Darland Banks LNR and 'South Wood' LNR respectively, resulting in a potential minor negative impact owing to the increased risk of development related threats and pressures on the LNRs. The largest of these is Site LW8 which lies 40m from South Wood LNR, proposed for the development of 2,075 residential units. All three sites include open spaces and green buffers within their accompanying masterplans; however, these measures are unlikely to fully address the issues arising from the large quantity of the proposed development.

F.4.5.2 The remaining 24 strategic sites are located further away from LNRs where the proposed development is likely to result in a negligible impact.

F.4.6 Local Wildlife Sites

F.4.6.1 Some 27 Local Wildlife Sites (LWS), formerly known as Sites of Nature Conservation Interest (SNCI) are located within Medway, including 'Great Lines' and 'Luton Banks'. The majority are located in the south of the Plan area, besides 'Grain Pit' which is located on the Isle of Grain.

F.4.6.2 Sites HW1 and LW8 coincide with and lie adjacent to several LWS. Site HW1 partially coincides with 'Grove Wood' and lies adjacent to 'Darland Banks' along the northern boundary of the site. Site LW8 partially coincides with 'Hook Wood' and lies adjacent to 'South Wood' to the east. The accompanying masterplans for both Site HW1 and Site LW8 indicate that the respective areas coinciding with LWSs will be open space and therefore retained. Despite indication that the two sites will retain the LWS that coincide, the sites could potentially lead to increased risk of development related threats and pressures on these LWSs owing to the close proximity of new residential growth, and result in a minor negative impact on biodiversity.

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F.4.6.3 Site CHR4 partially coincides with 'South Hill and Houlder Quarries' LWS, where a small parcel of the site coincides to the south west. The accompanying masterplan to Site CHR4 indicates that a new country park will be provided, and it is expected that the LWS will be retained as part of this development and potentially enhanced. The proposed residential development of 1,100 dwellings at the site will therefore be situated approximately 500m to the east of the LWS where significant adverse effects are unlikely, and a negligible impact is identified.

F.4.6.4 None of the remaining sites coincide or lie adjacent to an LWS and have therefore scored negligible against the biodiversity objective; however, it is acknowledged that adverse effects such as from recreational impacts can arise at greater distances.

F.4.7 Marine Conservation Zones

F.4.7.1 The Medway Estuary Marine Conservation Zone (MCZ) protects the dynamic ecosystem surrounding the River Medway and its confluence with the River Thames and the Swale. Seven sites (AS24, AS26, HHH12, HHH36, SMI5, SMI6 and SR53) lie adjacent to the MCZ. The indicative masterplan/information provided by the council for three of these sites include measures that might reduce development related impacts to some extent. Site AS24 includes approximately 83 hectares of land set aside for environmental mitigation, Site AS26 includes a restricted development area and Site HHH36 includes ecological enhancements. Overall, the proposed development at all seven sites have potential to result in a minor negative impact on the MCZ due to an increased risk of development pressures on marine habitats. Development within these sites could therefore have an adverse impact on habitats in and surrounding the River Medway.

F.4.8 Priority habitats

F.4.8.1 There are multiple priority habitats found throughout Medway. The most prominent of these include coastal and floodplain grazing marsh in the north of the Hoo Peninsula, mudflats surrounding the estuary and deciduous woodland scattered throughout Medway.

F.4.8.2 A total of 13 sites partially coincide with priority habitats, mostly including deciduous woodland. The accompanying masterplans and information provided by the Council indicate that seven sites (AS22, CHR4, HW1, LW6, LW8, RSE10 and SR17) will retain the priority habitats that are coincident with the site and will be likely to have a negligible impact on priority habitats in Medway. The proposed development at the remaining six sites (AS24, AS26, HHH12, HHH3, HHH36 and HHH6) will be likely to have a minor negative impact on priority habitats in Medway due to the potential loss or degradation of these habitats. In particular, 60% of the area of Site AS24 coincides with priority habitat (largely coastal and floodplain grazing marsh, leading to a higher likelihood of adverse effects at this location.

F.4.8.3 The remaining 14 sites do not coincide with any identified priority habitat, or coincide with insignificant proportions of priority habitat covering less than 1% of the site area; therefore, the proposed development at these sites will be likely to have a negligible impact on the overall presence of priority habitats.

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F.4.9 Regionally Important Geological and Geomorphological Sites

F.4.9.1 There are four Regionally Important Geological and Geomorphological Sites (RIGGS) in Medway which include a range of notable geological features and formations. These include 'Halling Chalk Pit', 'Bores Hole' and 'Francis Chalk Quarry', which are found in the west of Medway, and 'Fort Amherst' which is located centrally in the urban area. The proposed development at all strategic sites is likely to have a negligible impact on geological sites as they do not coincide with any RIGGS.

F.4.10 Open Mosaic Habitats

F.4.10.1 Open mosaic habitats (OMH) indicate areas of previously developed or brownfield land that have potential to support diverse habitats. There are 91 OMHs scattered throughout Medway, predominantly located in more rural areas.

F.4.10.2 Seven sites (AS24, AS26, CHR4, HHH3, HHH36, SR17 and SR9) partially coincide with OMHs. The accompanying masterplans for Sites CHR4 and SR17 indicate that the OMHs will be retained, and as such the proposed development will be likely to result in a negligible impact on OMHs. The proposed development at the remaining five sites (AS24, AS26, HHH3, HHH36 and SR9) could potentially result in direct adverse impacts on OMHs and loss of the biodiversity value they provide in Medway, with a minor negative impact identified.

F.4.10.3 The remaining 20 sites do not coincide with OMHs and are therefore likely to result in a negligible impact on OMHs in Medway.

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Table F.4.1: *Strategic sites impact matrix for SA Objective 3 – Biodiversity and geodiversity*

Site ref	Site use	European site	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitat	RIGGS	OSM
AS13	Residential led (mixed-use)	--	-	0	0	0	0	0	0	0	0
AS21	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
AS22	Residential led (mixed-use)	--	-	0	0	0	0	0	0	0	0
AS24	Non-residential	--	--	0	0	0	0	-	-	0	-
AS26	Non-residential	--	--	0	0	0	0	-	-	0	-
CHR4	Residential led (mixed-use)	-	-	-	0	0	0	0	0	0	0
HHH12	Residential led (mixed-use)	--	--	0	--	0	0	-	-	0	0
HHH22	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
HHH22/ HHH31	Residential led (mixed-use)	-	-	-	0	0	0	0	0	0	0
HHH26	Residential led (mixed-use)	-	-	-	-	0	0	0	0	0	0
HHH3	Residential led	-	--	0	-	0	0	0	-	0	-
HHH31	Residential led (mixed-use)	-	-	-	0	0	0	0	0	0	0
HHH35	Non-residential	-	-	0	0	0	0	0	0	0	0
HHH36	Non-residential	--	--	0	0	0	0	-	-	0	-
HHH6	Residential led (mixed-use)	-	-	0	-	0	0	0	-	0	0
HW1	Residential led	-	-	0	-	-	-	0	0	0	0
LW6	Residential led	-	-	0	-	-	0	0	0	0	0
LW8	Residential led	-	-	0	-	-	-	0	0	0	0
RN8	Residential led (mixed-use)	--	-	0	0	0	0	0	0	0	0
RN9	Residential led	--	-	0	0	0	0	0	0	0	0
RSE10	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SMI5	Non-residential	-	--	0	0	0	0	-	0	0	0
SMI6	Residential led (mixed-use)	-	--	0	0	0	0	-	0	0	0
SNF3	Residential led	-	-	0	0	0	0	0	0	0	0
SR17	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SR9	Residential led (mixed-use)	-	-	0	-	0	0	0	0	0	-
SR53	Residential led (mixed-use opportunity area)	-	-	0	0	0	0	-	0	0	0

F.5 SA Objective 4: Landscape and townscape

F.5.1 Kent Downs National Landscape

F.5.1.1 A small proportion of the Kent Downs Landscape (formerly known as AONB) lies within the south west and south east of the MLP area. A small portion of Site CHR4 coincides with the National Landscape, to the south west of the site, within land parcel '4B: Medway Valley' of the Kent Downs Landscape Character Assessment[8]. The accompanying masterplan for Site CHR4 indicates that the proposal will include the development of a new country park and it is expected that the area coincident with the National Landscape will be enhanced as part of this proposal. However, owing to the close proximity of the development there remains potential for the new development to have minor negative impacts on the character and/or setting of the designated landscape.

F.5.1.2 An additional four sites (HW1, LW6, LW8 and RSE10) are in close proximity to the National Landscape. Sites HW1, LW6 and LW8 form part of the wider Lidsing Garden Community proposal, and according to Policy LPRSP4(B) of the Adopted Maidstone Local Plan Review (2021-2038)[9] the sites will be landscape-led with regards to the surrounding area. The accompanying masterplan to RSE10 includes the provision of landscape buffers that could help to reduce associated negative impacts on views. However, despite the proposed measures, the four sites have potential to result in a minor negative impact on views or the setting of the designated landscape.

F.5.1.3 The remaining sites which are located at a greater distance from the National Landscape, or are already in an urbanised area, are unlikely to result in any significant adverse impacts and have therefore scored negligible.

F.5.2 Country Parks

F.5.2.1 Medway's Country Parks include 'Ranscombe Farm', 'Capstone Farm', and 'Riverside'. None of the strategic sites coincide with country parks, however two sites (LW6 and LW8) lie adjacent to Capstone Farm Country Park. Additionally, three sites (HW1, RN8 and RN9) are located in close proximity to a country park, with Site HW1 located approximately 10m from Capstone Farm Country Park, separated by Capstone Road and Site RN8 and RN9 are located approximately 15m from Riverside Country Park, separated by Lower Rainham Road. Sites LW6, LW8 and HW1 form part of the wider Lidsing Garden Community proposal, and in line with Policy LPRSP4(B) of the Adopted Maidstone Local Plan Review (2021-2038)[10] the sites will include landscape-led enhancements proposed to the Capstone Valley area. The accompanying masterplan for Sites RN8 and RN9 includes the provision of open space that could potentially reduce adverse effects on views and the setting of the nearby country park. However, despite the proposed measures the

[8] Fiona Fyfe Associates (2023) Kent Downs AONB Landscape Character Assessment Update 2020. Revised and Published 2023. Available at: https://kentdowns.org.uk/landscape-character-assessment-2020/ [Date accessed: 05/06/25]

[9] Maidstone Borough Council (2024). Maidstone Adopted Local Plan Review 2021-2038. Available at: https://localplan.maidstone.gov.uk/home/local-plan-review [Date accessed: 24/04/25]

[10] Maidstone Borough Council (2024). Maidstone Adopted Local Plan Review 2021-2038. Available at: https://localplan.maidstone.gov.uk/home/local-plan-review [Date accessed: 24/04/25]

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five sites have potential to result in a minor negative impact on the setting and/or views experienced from the country park.

F.5.2.2 The accompanying masterplan to Site CHR4 includes the development of a new country park. The provision of a new country park is expected to have a major positive impact on the provision of country parks within Medway and reduce recreational pressures on other more sensitive countryside locations in Medway.

F.5.2.3 The remaining sites which are located at a greater distance from a country park, or are already in an urbanised area, are unlikely to result in any significant adverse impacts and have therefore scored negligible.

F.5.3 Landscape Character Assessment

F.5.3.1 Baseline data on Landscape Character Areas within the Local Plan area are derived from the Medway Landscape Character Assessment (LCA)[11]. Some 34 Landscape Character Areas have been identified in Medway, each with individual characteristics, issues and key sensitivities. Key characteristics of each Landscape Character Area have informed the appraisal of each reasonable alternative strategic site against the landscape objective.

F.5.3.2 Of the 27 reasonable alternative strategic sites, 20 lie within rural or urban-fringe landscapes according to the LCA. Owing to the large size and undeveloped nature of these 20 sites, all are identified to have potential to discord with the characteristics identified in the LCA despite potential landscaping and GI proposals alongside the new development. These 20 sites could potentially lead to loss or degradation of key landscape features or contradict with the guidelines of the area in question; therefore, the proposed development could potentially have a minor negative impact on the landscape character. This includes seven sites within the 'Hoo Peninsula' character area where there is potential for loss of rural character and three sites within the 'Cliffe Woods' character area where there is potential loss of high hedgerows.

F.5.3.3 The remaining seven sites are located in the 'urban area' according the LCA, where the specific characteristics of the landscape/townscape have not been evaluated in the study. The proposed development at these sites is assessed as negligible based on the available information.

F.5.4 Landscape Sensitivity

F.5.4.1 The draft Hoo Landscape Sensitivity and Capacity study (February 2019)[12] has identified ten land parcels within the Hoo Peninsula which have been assessed for their sensitivity, value and capacity. The land parcels have been categorised based on their sensitivity to change as a result of future development, which the reasonable alternative site proposals have been assessed against. Some 19 strategic sites lie outside of the Landscape Sensitivity and Capacity study area. The potential effect of each of these sites on sensitive

[11] LUC (2024) Medway Landscape Character Assessment. Final Report, June 2024. Available at: https://medway.oc2.uk/docfiles/20/Landscape%20Character%20Assessment.pdf [Date accessed: 13/03/25]

[12] Medway Council (2019). Hoo Landscape Sensitivity and Capacity Study. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 13/03/25]

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landscapes is therefore uncertain at this stage, and would need to be informed by site-specific assessments.

F.5.4.2 All of the sites assessed for landscape sensitivity are part of the All Saints, Hoo St Werburgh and High Halstow, and Strood Rural wards. Site HHH12 is located partially in areas of 'high' sensitivity, and is therefore identified as being likely to have a major negative impact on the landscape for the purposes of the SA. Two sites (HHH26 and HHH6) are wholly located in areas of 'medium' sensitivity, with potential to lead to a minor negative impact on the landscape. Four sites (HHH22, HHH22/HHH31, HHH31, HHH35 and HHH36) are located in areas of 'low' sensitivity, and therefore have been identified as leading to a negligible impact on sensitive landscapes.

F.5.5 Landscape Capacity

F.5.5.1 The draft Hoo Landscape Sensitivity and Capacity study (February 2019)[13] has identified ten land parcels within the Hoo Peninsula which have been assessed for their sensitivity, value and capacity. The land parcels have been categorised based on their susceptibility to change as a result of future development, which the reasonable alternative site proposals have been assessed against. Some 19 strategic sites lie outside of the Sensitivity and Capacity study area. The potential effect of each of these sites on landscape capacity is therefore uncertain at this stage, and would need to be informed by site-specific assessments.

F.5.5.2 All of the strategic sites assessed for landscape capacity are part of the All Saints, Hoo St Werburgh and High Halstow, Strood Rural wards. Site HHH12 is located partially in areas assessed as 'medium-high' capacity. For the purposes of the SA, the site is identified as being likely to have a major negative impact on the landscape due to the lack of ability to accommodate change without significant effects. An additional two sites (HHH26 and HHH6) are wholly located in areas assessed as 'medium' capacity, with a potential minor negative impact on the landscape. Five sites (HHH22, HHH22/HHH31, HHH31, HHH35 and HHH36) are all in areas assessed as 'low-medium' where there is more capacity for change, and therefore these sites are scored as negligible.

F.5.6 Views from the PRoW network and National Trails

F.5.6.1 The Public Rights of Way (PRoW) and National Trail network in Medway is mostly interconnected in rural areas in the north and south west, however this becomes more fragmented in the urban areas. The proposed development at 25 reasonable alternative strategic sites could potentially alter the views of open space currently experienced by users of the PRoW network, and result in a minor negative impact on the landscape. For instance, Site CHR4 has approximately 3,150m of PRoW coinciding/running adjacent to the proposed greenfield site, and is therefore likely to change the views and recreational experience of PRoW users. Accompanying masterplans and information provided by the Council indicates that eight of the 27 sites would look to introduce new pedestrian links, enhance and/or retain the PRoW within the proposed development, however these measures are unlikely to address the visual impacts associated with the development.

[13] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 25/04/25]

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F.5.6.2 Site HHH6 is separated from PRoWs by existing built form and development at this location will be unlikely to significantly alter views upon development. A small proportion of PRoW coincides with Site SR53, however the site is already largely developed and will be unlikely to significantly alter views upon development. These two sites are assessed as negligible.

F.5.7 Views experienced by local residents

F.5.7.1 The development proposed at a large proportion of strategic sites in Medway is considered to have to potential to alter the views currently experienced by local residents, primarily due to their location with respect to existing residential zones and their large scale. A minor negative impact on the local landscape could therefore be expected at these 21 sites.

F.5.7.2 The remaining six sites comprise previously developed land and/or are located away from existing residential zones; therefore, the proposed development at these sites is unlikely to result in a significant impact on views.

F.5.8 Coalescence and urbanisation of the countryside

F.5.8.1 The risks of coalescence and urbanisation of the countryside are key considerations for development proposals within Medway. The north and south west of Medway is predominantly rural which creates a greater susceptibility for the joining of settlements or urban sprawl. Owing to their large scale, many of the strategic sites have potential to give rise to adverse effects in this regard.

F.5.8.2 The proposed development at 13 of the strategic sites were determined to reduce the separation between settlements and therefore increase the risk of coalescence and loss of identity of these settlements. This includes the risk of coalescence between Wainscott and Cliffe Woods, Chatham and Hempstead and Chattenden and Hoo.

F.5.8.3 The proposed development at 15 sites were assessed as having potential to increase the risk of encroachment/urban sprawl, owing to their location extending outside of the current built form.

F.5.8.4 The remaining eight sites that are located within the existing urban area or isolated rural settings include the non-residential development at Sites AS24 and AS26 located on the Isle of Grain and the brownfield Sites SMI5 and SMI6 located on the urban waterfront. These are identified to result in a negligible impact for coalescence and urban sprawl.

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Table F.5.1: *Strategic sites impact matrix for SA Objective 4 – Landscape*

Site ref	Proposed site use	AONB / National Landscape	Country Park	LCA	Landscape sensitivity	Landscape capacity	PRoW Views	Local residents Views	Coalescence / urban sprawl
AS13	Residential led (mixed-use)	0	0	-	+/-	+/-	-	-	-
AS21	Residential led (mixed-use)	0	0	-	+/-	+/-	-	-	-
AS22	Residential led (mixed-use)	0	0	-	+/-	+/-	-	-	-
AS24	Non-residential	0	0	0	+/-	+/-	-	0	0
AS26	Non-residential	0	0	0	+/-	+/-	-	0	0
CHR4	Residential led (mixed-use)	-	++	-	+/-	+/-	-	-	-
HHH12	Residential led (mixed-use)	0	0	-	--	--	-	-	-
HHH22	Residential led (mixed-use)	0	0	-	0	0	-	-	-
HHH22/HHH31	Residential led (mixed-use)	0	0	-	0	0	-	-	-
HHH26	Residential led (mixed-use)	0	0	-	-	-	-	-	-
HHH3	Residential led	0	0	0	+/-	+/-	-	-	-
HHH31	Residential led (mixed-use)	0	0	-	0	0	-	-	-
HHH35	Non-residential	0	0	-	0	0	-	-	0
HHH36	Non-residential	0	0	-	0	0	-	0	-
HHH6	Residential led (mixed-use)	0	0	-	-	-	0	-	-
HW1	Residential led	-	-	-	+/-	+/-	-	-	0
LW6	Residential led	-	-	-	+/-	+/-	-	-	-
LW8	Residential led	-	-	-	+/-	+/-	-	-	-
RN8	Residential led (mixed-use)	0	-	-	+/-	+/-	-	-	-
RN9	Residential led	0	-	0	+/-	+/-	-	-	-
RSE10	Residential led (mixed-use)	-	0	-	+/-	+/-	-	-	-
SMI5	Non-residential	0	0	0	+/-	+/-	-	0	0
SMI6	Residential led (mixed-use)	0	0	0	+/-	+/-	-	0	0
SNF3	Residential led	0	0	-	+/-	+/-	-	-	0
SR17	Residential led (mixed-use)	0	0	-	+/-	+/-	-	-	0
SR9	Residential led (mixed-use)	0	0	-	+/-	+/-	-	-	-
SR53	Residential led (mixed-use opportunity area)	0	0	0	+/-	+/-	0	0	0

F.6 SA Objective 5: Pollution and waste

F.6.1 Air Quality Management Area

F.6.1.1 There are four small Air Quality Management Areas (AQMA) within Medway. These are located along sections of main roads where national air quality objectives are unlikely to be met. Three sites are located wholly or partially within 200m of an AQMA: Site HHH12 is partially located within 200m of 'Four Elms' AQMA and Sites SMI5 and SMI6 are partially located within 200m of 'Gillingham AQMA', and as such, the proposed development at these sites is likely to locate some site end users in areas of existing poor air quality and potentially contribute towards increased traffic within the AQMAs. A minor negative impact on air pollution is identified for these sites.

F.6.1.2 Site RSE10 is located over 200m from the Rainham AQMA, although it is located just beyond the 200m buffer at 250m. The accompanying site masterplan proposes a new road connecting the A2 with Mierscourt Road to ease congestion on the A2 and reduce pressure in the Rainham AQMA. Site RSE10 is identified as having a minor positive impact on air quality within the AQMA.

F.6.1.3 The proposed development at the remaining sites (23) which are over 200m from an AQMA are likely to have a negligible impact on AQMAs in Medway although it is acknowledged that cumulative air quality effects could occur across the Plan area as a whole.

F.6.2 Main Road

F.6.2.1 Many major roads pass through Medway, including the A2, A226, A228, A229, A278, A230, A231 and the M2. Some 13 sites are located within 200m of a main road. The proposed development at these 13 sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads could potentially have a minor negative impact on air quality and noise at these sites.

F.6.2.2 The proposed development at the remaining 14 sites which are over 200m from a main road are expected to have a negligible impact on air and noise pollution from transportation associated with main roads.

F.6.3 Railway Line

F.6.3.1 Multiple railway lines pass through Medway, including the Hoo Peninsula freight line in the north. Passenger railway lines continue through and adjacent to the urban area of Medway and in the more rural areas in the south west. Eight sites (AS24, CHR4, HHH22/HHH31, HHH31, HHH35, RN8, RN9 and SNF3) are located largely or partially within 200m of a railway line which could potentially expose site end users to noise pollution and vibrations. A minor negative impact is identified for these six sites.

F.6.3.2 The proposed development at the remaining 19 sites which are over 200m from a railway line is expected to have a negligible impact on air and noise pollution from transportation associated with railway lines.

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F.6.4 Watercourse

F.6.4.1 Medway's watercourse network comprises the River Medway and its tributaries, as well as tributaries of the River Thames and the Swale. The River Medway runs through the centre of the Plan area, whereas the majority of smaller rivers run through the rural areas in the north. Some 11 sites (AS13, AS24, AS26, HHH12, HHH22/HHH31, HHH31, HHH35, HHH6, SMI5, SMI6 and SR53) coincide with, or are located within 10m of various watercourses, including Sites HHH6, HHH12, SMI5 and SMI6 that are adjacent to the River Medway and Sites AS24 and AS26 located within 10m of the River Medway when the tide is in. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality.

F.6.4.2 Site HHH36 is adjacent to Damhead Creek, however the accompanying masterplan for the site includes a green buffer around the edges of the site that will incorporate SuDS and reduce water pollution. A negligible impact on water quality is identified at Site HHH36.

F.6.4.3 Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location. At this stage, the potential effects of these 16 sites on water quality are uncertain and would depend upon implementation.

F.6.5 Groundwater Source Protection Zone

F.6.5.1 Source Protection Zones (SPZs) for groundwater within Medway are located to the south. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. Six sites (CHR4, HW1, LW6, LW8, SNF3 and SR53) are located wholly or partially within an SPZ, the majority being in zone 3. Consequently, these six sites have potential to result in a minor negative impact on groundwater quality.

F.6.5.2 Site SR17 coincides with SPZ 3. The accompanying masterplan for Site SR17 includes the incorporation of SuDs and provision of swales, filter trenches, rain gardens and permeable paving across the development area. These measures are likely to help ensure that the SPZ will be protected from the proposed development and aid water filtration, therefore a negligible impact on groundwater quality is identified.

F.6.5.3 The remaining 20 strategic sites do not coincide with the catchment of any SPZ, and therefore, the proposed development at these sites may have a negligible impact on groundwater quality.

F.6.6 Potential increase in air pollution

F.6.6.1 Some 22 sites proposed for residential use have capacity for the development of 100 or more dwellings. This includes Site SMI6, which is proposed for the development of 2,200 residential units. The proposed development at these larger scale sites could potentially result in a significant increase in local air pollution, resulting in a major negative impact.

F.6.6.2 Five sites are proposed for employment-led end use and comprise over 1ha. This includes Site AS24, which comprises over 170ha. The proposed development at these sites could potentially result in a significant increase in local air pollution, resulting in a major negative impact.

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F.6.6.3 **Chapter D.11 (Transport and Accessibility)** provides further detail regarding the measures that sites will include to provide greater accessibility to sustainable transport and provide new sustainable transport services such as new bus routes. For example, Site AS22 will increase service frequency and work with local employers to understand shift patterns, as well as working with Arriva to provide access to electric buses. These measures are likely to increase the uptake in sustainable transport and reduce the reliance on private car use, improving local air quality.

F.6.7 Waste

F.6.7.1 The estimated total household waste produced within Medway in 2023/2024 was 113,851 tonnes, according to UK local authority household waste data[14]. Residential-led development is likely to result in an increase in household waste generation, to some extent. Given the large scale of housing growth proposed at the residential-led strategic sites, there is potential for a significant increase in household waste to be generated.

F.6.7.2 Sites proposed for employment or non-residential end use may present further negative effects on waste production; however, this would be dependent on the site-specific proposals and the nature of development, which is unknown at the time of assessment.

F.6.7.3 The waste likely to be generated as a result of each strategic development site is currently uncertain.

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[14] Department for Environment, Food and Rural Affairs (2025) Local Authority Collected Waste Statistics for 2023/2024. Available at: www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results [Date accessed: 24/04/25]

Table F.6.1: *Strategic sites impact matrix for SA Objective 5 – Pollution and waste*

Site ref	Proposed site use	AQMA	Main road	Railway line	Watercourse	SPZ	Increase in air pollution	Waste
AS13	Residential led (mixed-use)	0	-	0	-	0	--	+/-
AS21	Residential led (mixed-use)	0	0	0	+/-	0	--	+/-
AS22	Residential led (mixed-use)	0	0	0	+/-	0	--	+/-
AS24	Non-residential	0	0	-	-	0	--	+/-
AS26	Non-residential	0	0	0	-	0	--	+/-
CHR4	Residential led (mixed-use)	0	-	-	+/-	-	--	+/-
HHH12	Residential led (mixed-use)	-	0	0	-	0	--	+/-
HHH22	Residential led (mixed-use)	0	-	0	+/-	0	--	+/-
HHH22/HHH31	Residential led (mixed-use)	0	-	-	-	0	--	+/-
HHH26	Residential led (mixed-use)	0	-	0	+/-	0	--	+/-
HHH3	Residential led	0	0	0	+/-	0	--	+/-
HHH31	Residential led (mixed-use)	0	-	-	-	0	--	+/-
HHH35	Non-residential	0	0	-	-	0	--	+/-
HHH36	Non-residential	0	0	0	0	0	--	+/-
HHH6	Residential led (mixed-use)	0	-	0	-	0	--	+/-
HW1	Residential led	0	0	0	+/-	-	--	+/-
LW6	Residential led	0	0	0	+/-	-	--	+/-
LW8	Residential led	0	0	0	+/-	-	--	+/-
RN8	Residential led (mixed-use)	0	0	-	+/-	0	--	+/-
RN9	Residential led	0	0	-	+/-	0	--	+/-
RSE10	Residential led (mixed-use)	+	-	0	+/-	0	--	+/-
SMI5	Non-residential	-	-	0	-	0	--	+/-
SMI6	Residential led (mixed-use)	-	-	0	-	0	--	+/-
SNF3	Residential led	0	-	-	+/-	-	--	+/-
SR17	Residential led (mixed-use)	0	-	0	+/-	0	--	+/-
SR9	Residential led (mixed-use)	0	0	0	+/-	0	--	+/-
SR53	Residential led (mixed-use opportunity area)	0	-	0	-	0	--	+/-

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F.7 SA Objective 6: Natural resources

F.7.1 Previously undeveloped land / land with environmental value

F.7.1.1 Medway is primarily built-up in the south of the Plan area, with the urban area containing a wide range of green spaces. Rural areas span the north of the Hoo Peninsula, as well as a small section in the south west of the Plan area associated with the Kent Downs National Landscape.

F.7.1.2 Three strategic sites (SMI5, SMI6 and SR53) wholly comprise previously developed land which is likely to have little or no environmental value. The proposed development at these sites is expected to have a minor positive impact on natural resources as development will be classed as an efficient use of land.

F.7.1.3 There are 19 strategic sites which wholly comprise greenfield land and contain features that are likely to be of environmental value such as hedgerows, trees and scrub that has potential to be lost to development. Furthermore, five sites are partially previously developed / brownfield sites but also include areas of potential environmental value that could be lost or degraded by the proposed development. Of these 24 sites, it is indicated within accompanying site masterplans and information provided by the Council that 16 sites will include areas of green space, however large proportions of undeveloped land will still be lost at these 16 sites. Therefore, the proposed development at these 24 sites is identified to have a minor negative impact on natural resources due to the potential loss of ecologically or environmentally valuable soil resources.

F.7.2 Agricultural Land Classification

F.7.2.1 The land within Medway is predominantly 'urban' and Grade 3 in the south according to the Agricultural Land Classification (ALC), whilst the north contains large areas of Grades 1, 3 and 4 land. Given the large scale of the strategic sites, ranging from approximately 24 to 158ha in area, there is potential for the development at many of these sites to lead to adverse effects as a result of the loss of agricultural land.

F.7.2.2 Some 21 strategic sites contain over 20ha of land which is classed as ALC Grades 1, 2 and 3. Grade 1, 2 and potentially Grade 3 represent the best and most versatile (BMV) agricultural land. The masterplans for two sites (HW1 and RN8) indicate that 22.9ha of green and blue infrastructure at Site HW1 and a large proportion of GI at Site RN8 will be included and therefore the associated ALC Grade 1, 2, or 3 land will be retained. This reduces the likely loss of BMV land to below the 20ha threshold, although still potentially resulting in a minor negative impact on BMV land overall. The remaining 19 sites comprise previously undeveloped land, or contain areas of potential environmental value, which includes ALC Grades 1, 2 or 3, and as such the proposed development at these locations could potentially result in a major negative impact on BMV land due to the significant loss of this important natural resource. This includes a large proportion of sites in the All Saints, Hoo St Werburgh and High Halstow.

F.7.2.3 Site AS26 comprises previously developed land, however, also contains scattered areas of land with potential environmental value that is located on ALC Grade 2 land, equating to less than 20ha. The proposed development at the site could potentially result in a minor negative impact due to the loss of BMV land.

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F.7.2.4 Site AS24 is located in areas ALC Grade 4, 5, urban or non-agricultural land. The site is not located on BMV land and therefore is likely to result in a minor positive impact in terms of the conservation of agricultural land.

F.7.2.5 Site HHH36 is partially located on ALC Grade 1 land to the north, however the accompanying site masterplan indicates that the area is proposed for open space and will therefore retain the associated high quality agricultural land. The remaining land at the site is located on areas of ALC Grade 4 or urban land. Therefore, overall, the proposed development at Site HHH36 is likely to result in a minor positive impact in terms of the conservation of BMV agricultural land.

F.7.3 Mineral Safeguarding Areas

F.7.3.1 Mineral Safeguarding Areas (MSAs) are located sporadically throughout Medway. These are predominantly sand and gravel resources situated along the River Medway and within rural areas in the north of the Hoo Peninsula.

F.7.3.2 Four strategic sites (AS13, AS21, SMI6 and SR53) wholly or partially coincide with MSAs. The accompanying masterplan plan for Site SMI6 indicates that the MSA coincident with the site will be retained as open space and therefore a negligible impact on the underlying mineral resources is likely. Sites AS13 and AS21 and SR53 are identified as having a minor negative impact on mineral resources, due to the potential sterilisation of underlying mineral resources.

F.7.3.3 Site SR53 largely coincides with MSAs. The site is predominantly PDL and includes a quarry in the north-eastern section, known as 'Heidelberg Aggregates'. At this stage of assessment, it remains uncertain whether the proposed development at Site SR53 will result in the sterilisation of mineral resources. A Minerals Assessment would be required at the planning application stage to determine the likely type and extent of minerals and whether or not it would be economical to extract the resource before development.

F.7.3.4 The remaining 23 sites do not coincide with MSAs and are therefore expected to result in a negligible impact on mineral resources.

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Table F.7.1: *Strategic sites impact matrix for SA Objective 6 – Natural resources*

Site ref	Proposed site use	Land with environmental value	ALC	Mineral Safeguarding Area
AS13	Residential led (mixed-use)	-	--	-
AS21	Residential led (mixed-use)	-	--	-
AS22	Residential led (mixed-use)	-	--	0
AS24	Non-residential	-	+	0
AS26	Non-residential	-	-	0
CHR4	Residential led (mixed-use)	-	--	0
HHH12	Residential led (mixed-use)	-	--	0
HHH22	Residential led (mixed-use)	-	--	0
HHH22/HHH31	Residential led (mixed-use)	-	--	0
HHH26	Residential led (mixed-use)	-	--	0
HHH3	Residential led	-	--	0
HHH31	Residential led (mixed-use)	-	--	0
HHH35	Non-residential	-	--	0
HHH36	Non-residential	-	+	0
HHH6	Residential led (mixed-use)	-	--	0
HW1	Residential led	-	-	0
LW6	Residential led	-	--	0
LW8	Residential led	-	--	0
RN8	Residential led (mixed-use)	-	-	0
RN9	Residential led	-	--	0
RSE10	Residential led (mixed-use)	-	--	0
SMI5	Non-residential	+	0	0
SMI6	Residential led (mixed-use)	+	0	0
SNF3	Residential led	-	--	0
SR17	Residential led (mixed-use)	-	--	0
SR9	Residential led (mixed-use)	-	--	0
SR53	Residential led (mixed-use opportunity area)	+	0	+/-

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F.8 SA Objective 7: Housing

F.8.1 Housing provision

F.8.1.1 Residential-led development is likely to result in a net gain in housing. The 20 strategic sites in Medway proposed solely for residential use are therefore expected to result in major positive impacts under this objective, given that all strategic sites include the development of 300 or more homes. The proposed development at these 20 sites will be likely to make a significant contribution towards meeting Medway's identified housing needs.

F.8.1.2 It is expected that residential development will include a good mix of housing type and density. Four of the 20 sites (AS22, HHH26, HHH3 and SR17) indicate (within their accompanying masterplan or information provided by the Council) that either affordable housing, mixed density and mixed housing type will be included. For example, Site AS22 will provide self-build and custom build housing and energy efficient homes. The remaining 16 sites will be expected to incorporate similar measures to meet the needs of future residents.

F.8.1.3 Employment-led strategic sites (AS24, AS26, HHH35, HHH36 and SMI5) are not expected to result in a net change in housing provision and therefore a negligible impact is identified.

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Table F.8.1: *Strategic sites impact matrix for SA Objective 7 – Housing*

Site ref	Proposed site use	Housing provision
AS13	Residential led (mixed-use)	++
AS21	Residential led (mixed-use)	++
AS22	Residential led (mixed-use)	++
AS24	Non-residential	0
AS26	Non-residential	0
CHR4	Residential led (mixed-use)	++
HHH12	Residential led (mixed-use)	++
HHH22	Residential led (mixed-use)	++
HHH22/HHH31	Residential led (mixed-use)	++
HHH26	Residential led (mixed-use)	++
HHH3	Residential led	++
HHH31	Residential led (mixed-use)	++
HHH35	Non-residential	0
HHH36	Non-residential	0
HHH6	Residential led (mixed-use)	++
HW1	Residential led	++
LW6	Residential led	++
LW8	Residential led	++
RN8	Residential led (mixed-use)	++
RN9	Residential led	++
RSE10	Residential led (mixed-use)	++
SMI5	Non-residential	0
SMI6	Residential led (mixed-use)	++
SNF3	Residential led	++
SR17	Residential led (mixed-use)	++
SR9	Residential led (mixed-use)	++
SR53	Residential led (mixed-use opportunity area)	++

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F.9 SA Objective 8: Health and wellbeing

F.9.1 Access to NHS hospital with A&E department

F.9.1.1 Medway Maritime Hospital is the only NHS with an Accident & Emergency department within the Plan area. Eight strategic sites (HW1, LW6, LW8, RN8, RN9, SMI5, SMI6 and SR53) are located within 5km of the Medway Maritime Hospital, and as such the proposed development at these sites will be likely to have a minor positive impact on access to emergency healthcare due to being within a sustainable distance to these services.

F.9.1.2 The remaining 19 sites are located over 5km from the hospital. These sites are primarily situated in the north, south west and south east of Medway. The proposed development at these sites may therefore have more limited sustainable access to emergency healthcare, with a potential minor negative impact on health.

F.9.2 Access to GP Surgery

F.9.2.1 There are 58 GP surgeries in Medway serving the existing local communities, particularly concentrated within the urban area in the south of Medway.

F.9.2.2 Five strategic sites (AS13, HHH12, RSE10, SMI5 and SMI6) are located within 800m of an existing GP surgery, owing to their location within built-up areas, as well as some rural settlements. The accompanying masterplan for Site RSE10 indicates that the proposed development will include a new medical hub; additionally, the site is located approximately 215m south of the existing Mierscourt Road Surgery. The majority of Site RN9 is located over 800m from an existing GP surgery, the nearest being Waltham Road Medical Centre, however the accompanying masterplan indicates that the proposed development will include a new medical hub. The proposed development at these six sites will be likely to result in a minor positive impact on sustainable access to GP surgeries.

F.9.2.3 The remaining 21 strategic sites are located over 800m from a GP surgery. The proposed development at these 21 sites could potentially result in a minor negative impact on access to GP surgeries.

F.9.2.4 Accompanying masterplans and information provided by the Council indicate that several sites will provide transport enhancements that could indirectly improve accessibility to GP surgeries. For example, Site AS13 will provide increased bus services and Site HHH31 includes plans to develop a new railway station. However, transport enhancements will not locate the sites within sustainable distance to GP surgeries and are unlikely to have a significant impact on overall accessibility to GP surgeries.

F.9.3 Access to leisure facilities

F.9.3.1 There are five leisure centres in Medway, all located within the central portion of the Plan area. These include ‘Hoo Sports Centre’, ‘Cozenton Park Sports Centre’, ‘Strood Sports Centre’, ‘Medway Park Sports Centre’ and ‘The Strand Leisure Park’.

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F.9.3.2 Seven sites (HHH12, HHH6, RN8, RN9, SMI5, SMI6 and SNF3) are located within 1.5km of an existing leisure centre and therefore, the proposed development at these sites is expected to have a minor positive impact on sustainable access to leisure facilities. These sites are primarily located in urban areas.

F.9.3.3 Nine sites are located outside of the 1.5km sustainable target distance to an existing leisure centre, however information provided by the Council indicates that these nine sites will include new social infrastructure (Sites AS13, AS21, AS22, CHR4, HHH26, HHH3, RSE10, SR17 and SR9). For example, Site SR9 includes the development of a local centre and Site RSE10 includes the development of community uses/local centre. The proposed development at these nine sites could potentially have a minor positive impact on sustainable access to leisure facilities.

F.9.3.4 The remaining 11 strategic sites which are located beyond the recommended sustainable distance are identified to have a minor negative impact on access to leisure facilities.

F.9.4 Access to public greenspace

F.9.4.1 Greenspaces are distributed throughout Medway, including parks, allotments, playing fields, Cliffe Pools in the north east and the Ranscombe Farm Country Park in the south east. The majority of strategic sites (16) are located within 600m of one or more of these greenspaces, and therefore the proposed development at these sites will be likely to result in a minor positive impact on access to greenspace.

F.9.4.2 Five sites (HHH26, HHH36, SNF3, SR9 and SR53) are located over 600m from an existing public greenspace, however the accompanying masterplans and / or information provided by the Council indicates that new greenspace will be provided on the site. Therefore, the proposed development at these sites will be likely to result in a minor positive impact on access to greenspace.

F.9.4.3 The remaining six sites (AS24, AS26, HHH22, HHH22/HHH31, HHH31, HHH35) are located over 600m from existing public greenspaces and the supporting information does not specify any additional provision. The Hoo St Werburgh and High Halstow ward has the poorest greenspace provision. The proposed development at these five sites could potentially lead to a minor negative impact on access to greenspace.

F.9.5 Net loss of public greenspace

F.9.5.1 A large proportion of Site HHH3 coincides with the entirety of 'Lodge Hill Recreation Ground' playing field to north. The accompanying masterplan to Site HHH3 indicates that the area of greenspace will be retained alongside the proposed development. Therefore, a negligible impact is likely on the provision of greenspace across Medway.

F.9.5.2 The remaining sites do not coincide with existing public greenspace and are therefore likely to have a negligible impact on the loss of greenspace across Medway.

F.9.6 Access to Public Rights of Way / cycle paths

F.9.6.1 The majority of strategic sites (26) are located within 600m of the PRoW and cycle network. The proposed development at these sites will be likely to provide site end users with good

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pedestrian and cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.9.6.2 However, Site AS24 is located wholly over 600m from the PRoW and cycle network; therefore, the proposed development at the site could potentially have a minor negative impact on pedestrian and cycle access.

Table F.9.1: *Strategic sites impact matrix for SA Objective 8 – Health and wellbeing*

Site ref	Proposed site use	NHS Hospital	GP Surgery	Leisure facilities	Access to greenspace	Loss of greenspace	Access to PRoW or cycle network
AS13	Residential led (mixed-use)	-	+	+	+	0	+
AS21	Residential led (mixed-use)	-	-	+	+	0	+
AS22	Residential led (mixed-use)	-	-	+	+	0	+
AS24	Non-residential	-	-	-	-	0	-
AS26	Non-residential	-	-	-	-	0	+
CHR4	Residential led (mixed-use)	-	-	+	+	0	+
HHH12	Residential led (mixed-use)	-	+	+	+	0	+
HHH22	Residential led (mixed-use)	-	-	-	-	0	+
HHH22/ HHH31	Residential led (mixed-use)	-	-	-	-	0	+
HHH26	Residential led (mixed-use)	-	-	+	+	0	+
HHH3	Residential led	-	-	+	+	0	+
HHH31	Residential led (mixed-use)	-	-	-	-	0	+
HHH35	Non-residential	-	-	-	-	0	+
HHH36	Non-residential	-	-	-	+	0	+
HHH6	Residential led (mixed-use)	-	-	+	+	0	+
HW1	Residential led	+	-	-	+	0	+
LW6	Residential led	+	-	-	+	0	+
LW8	Residential led	+	-	-	+	0	+
RN8	Residential led (mixed-use)	+	-	+	+	0	+
RN9	Residential led	+	+	+	+	0	+
RSE10	Residential led (mixed-use)	-	+	+	+	0	+
SMI5	Non-residential	+	+	+	+	0	+
SMI6	Residential led (mixed-use)	+	+	+	+	0	+
SNF3	Residential led	-	-	+	+	0	+
SR17	Residential led (mixed-use)	-	-	+	+	0	+
SR9	Residential led (mixed-use)	-	-	+	+	0	+
SR53	Residential led (mixed-use opportunity area)	+	-	-	+	0	+

F.10 SA Objective 9: Cultural heritage

F.10.1 Grade I Listed Buildings

F.10.1.1 There are 49 Grade I Listed Buildings distributed throughout Medway. Five strategic sites lie in close proximity to Grade I Listed Buildings in Medway. Site AS13 is located approximately 70m from 'St Peters and Pauls Church', Sites AS21 and AS22 are located approximately 150m from 'All Saints Church', Site HHH12 is located approximately 90m from 'St Werburgh Church' and Site SR53 is located 100m from 'Barn 30 yards south west of the manor house'. The proposed development at these four sites could potentially result in a minor negative impact on the setting of Grade I Listed Buildings.

F.10.1.2 The proposed development at the remaining 22 strategic sites is unlikely to significantly impact any Grade I Listed Building, primarily due to sites being separated from listed buildings by existing built form.

F.10.2 Grade II* Listed Buildings

F.10.2.1 There are 78 Grade II* Listed Buildings distributed throughout Medway. A large portion of these listed buildings are concentrated within the urban areas of Rochester and Brompton. Three strategic sites lie in close proximity to Grade II* Listed Buildings. Site AS21 is located approximately 140m south of 'Slough Fort', Site RN9 is located 80m from 'Bloors Place' and Site SR53 is located 100m from 'Parish Church of All Saints'. The proposed development at these three sites could potentially result in a minor negative impact on the setting of these Grade II* Listed Buildings.

F.10.2.2 The proposed development at the remaining 24 strategic sites is unlikely to significantly impact any Grade II* Listed Building, primarily due to sites being separated from listed buildings by existing built form.

F.10.3 Grade II Listed Buildings

F.10.3.1 There are 526 Grade II Listed Buildings distributed throughout Medway, most of which are concentrated within the urban areas of Rochester and Brompton, with others scattered sporadically through the rest of the Plan area.

F.10.3.2 Five sites (CHR4, HHH22, HHH22/HHH31, RN9 and SR17) lie adjacent to Grade II Listed Buildings. Site CHR4 is adjacent to 'Clement's Farm House', Sites HHH22 and HHH22/HHH31 are adjacent to 'Four pillarboxes', Site RN9 is adjacent to 'Pump Farmhouse' and Site SR17 is adjacent to 'Sole Street Farm House'. An additional 12 strategic sites are located in close proximity to Grade II Listed Buildings, all of which have potential to alter the setting of the listed buildings. The proposed development at these 17 sites could therefore potentially result in a minor negative impact on this receptor. Heritage assessments have been prepared for several of the sites, alongside proposed green corridors and landscape buffers that will provide a green buffer/setting to the surrounding listed buildings. For example, the heritage impact assessment for Site HHH36 identifies specific requirements in relation to the height of new buildings, to protect the setting of historic assets, and Site HHH22 includes green corridors and landscape buffers which are likely to retain the setting of the 'Four pillarboxes' Grade II Listed Building.

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F.10.3.3 The remaining ten strategic sites are unlikely to significantly impact any Grade II Listed Buildings, primarily due to sites being separated from listed buildings by existing built form.

F.10.4 Conservation Area

F.10.4.1 Medway contains 26 Conservation Areas (CA), the majority of which cover sections of the urban area.

F.10.4.2 Four sites lie adjacent to a CA, where Site RN8 is adjacent to 'Lower Twydall' CA and 'Lower Rainham' CA, Site RN9 is located adjacent to 'Lower Rainham' CA, Site RSE10 is adjacent to 'Moor Street' CA and Site SR53 is located adjacent to 'Frinsbury and Manor Farm' CA. Development at Site SR53 could also result in adverse effects on the setting of the 'Chatham Historic Dockyard' CA which lies across the River Medway. The accompanying masterplans for Sites RN8, RN9 and RSE10 provide measures to reduce the adverse effects associated with the proposed development, where Site RN8 and Site RN9 will include open space where the site is located adjacent to the CA and Site RSE10 will include landscape buffers and a gap in development either side of the CA to maintain separation. In addition to these two sites, CHR4 is located approximately 140m east of 'Halling' CA. The indicative masterplan for Site CHR4 includes large open spaces along the eastern boundary. However, there remains potential for adverse effects on the setting of nearby CAs arising from the large-scale development at Sites RN8, RN9, RSE10, CHR4 and SR53 which could adversely affect the character and setting of the current isolated settlements encompassed by 'Lower Rainham' CA, 'Moor Street' and 'Lower Twydall' CA.

F.10.4.3 The remaining 22 sites are not expected to have a significant impact on the setting of any CA, with negligible impacts identified.

F.10.5 Scheduled Monument

F.10.5.1 There are 77 Scheduled Monuments (SM) located in Medway. A large number of these are concentrated within the urban area of Rochester and Brompton, with the rest being scattered throughout the rest of Medway.

F.10.5.2 Two strategic sites lie adjacent to SMs. Site AS26 lies adjacent to 'Coastal Artillery Defences' SM which is on the Heritage at Risk register and is in 'very bad' condition[15]. The site lies within the riverside and tidal mudflats which contain the most substantial military remains in the Isle of Grain[16]. Development at the site has the potential to increase human and environmental threats to the SMs. Additionally, Site HHH12 lies adjacent to 'Cockham Wood Fort' SM and Site AS21 is located approximately 60m from 'Slough Fort and Wing Batteries' SM. Site SR53 is located 250m from various SMs, separated by the River Medway, including 'Site of 17th century dockyard' and 'Chatham dockyard, dry docks 2,3 and 4'. Site SR53 is identified as an opportunity area by the Council and depending on the nature and scale of development arising on site, there is potential to impact the setting of the historic assets located within the historic dockyard area. The proposed development

[15] Historic England (2023) Heritage at Risk Register: Coastal artillery defence structures on the Isle of Grain, including the Artillery Tower (Grain Tower), Isle of Grain - Medway (UA). Available at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/48030 [Date accessed: 13/03/25]

[16] Smith (2014) Isle of Grain, Hoo Peninsula, Kent, Historic Area Assessment. Available at: https://historicengland.org.uk/research/results/reports/6176/IsleofGrainHooPeninsulaKent_OutlineHistoricAreaAssessment [Date Accessed: 13/05/25]

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at these four sites could potentially result in a minor negative impact on the character or setting of these SMs.

F.10.5.3 All other strategic sites are not located in close proximity to any SMs, and as such, the proposed development at these sites is not expected to significantly impact the setting of any of these SMs.

F.10.6 Registered Park and Gardens

F.10.6.1 Three Registered Parks and Gardens (RPGs) can be found within Medway: 'Cobham Hall', 'The Officers' terrace, the Historic Dockyard, Chatham' and 'Jewish Burial Ground, Chatham Memorial Synagogue'. All 27 strategic sites are deemed unlikely to have a significant impact on the setting of any RPG due to the previously developed nature of the sites and/or presence of intervening development. A negligible impact on RPGs has been identified for all strategic sites.

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Table F.10.1: *Strategic sites impact matrix for SA Objective 9 – Cultural heritage*

Site ref	Proposed site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Parks and Gardens
AS13	Residential led (mixed-use)	-	0	-	0	0	0
AS21	Residential led (mixed-use)	-	-	-	0	-	0
AS22	Residential led (mixed-use)	-	0	-	0	0	0
AS24	Non-residential	0	0	-	0	0	0
AS26	Non-residential	0	0	0	0	-	0
CHR4	Residential led (mixed-use)	0	0	-	-	0	0
HHH12	Residential led (mixed-use)	-	0	0	0	-	0
HHH22	Residential led (mixed-use)	0	0	-	0	0	0
HHH22/ HHH31	Residential led (mixed-use)	0	0	-	0	0	0
HHH26	Residential led (mixed-use)	0	0	-	0	0	0
HHH3	Residential led	0	0	0	0	0	0
HHH31	Residential led (mixed-use)	0	0	-	0	0	0
HHH35	Non-residential	0	0	-	0	0	0
HHH36	Non-residential	0	0	-	0	0	0
HHH6	Residential led (mixed-use)	0	0	0	0	0	0
HW1	Residential led	0	0	-	0	0	0
LW6	Residential led	0	0	0	0	0	0
LW8	Residential led	0	0	0	0	0	0
RN8	Residential led (mixed-use)	0	0	-	-	0	0
RN9	Residential led	0	-	-	-	0	0
RSE10	Residential led (mixed-use)	0	0	-	-	0	0
SMI5	Non-residential	0	0	0	0	0	0
SMI6	Residential led (mixed-use)	0	0	0	0	0	0
SNF3	Residential led	0	0	0	0	0	0
SR17	Residential led (mixed-use)	0	0	-	0	0	0
SR9	Residential led (mixed-use)	0	0	0	0	0	0
SR53	Residential led (mixed-use opportunity area)	-	-	-	-	-	0

F.11 SA Objective 10: Transport and accessibility

F.11.1 Proximity to bus stop

F.11.1.1 Many bus stops are distributed throughout Medway. These are generally expected to provide regular public transport access, with the exception of some rural areas where bus services are more thinly distributed and less regular. Some nine strategic sites (AS13, AS21, HHH26, HW1, LW6, SMI5, SMI6, SNF3 and SR53) are located within 400m of a bus stop providing regular services. The proposed development at these sites is expected to result in a minor positive impact on access to sustainable transport options.

F.11.1.2 Six strategic sites (AS22, CHR4, HHH22/HHH31, RN8, RSE10 and SR17) are located outside of the sustainable distance of 400m from an existing bus stop providing regular services, however the accompanying masterplans and/or site information provided by the Council indicates that these sites will include measures to improve accessibility to bus services. The proposed development at Sites CHR4 and RN8 will invest in the enhancement of service provision, Site AS22 will increase service frequency and work with employers to understand shift patterns, and also work with Arriva to provide access to electric buses. Site HHH22/HHH31 will provide a new bus route within the site. Site RSE10 will include a new road link to connect the A2 to Mierscourt Road and improve accessibility to the bus services situated along these roads, and also provide potential for new services. Additionally, Site SR17 will include the proposal of a new bus route. Overall, a minor positive impact on access to sustainable transport is expected at these six sites.

F.11.1.3 The remaining 11 sites are located wholly or partially outside of the sustainable distance of 400m from a bus stop providing regular services. A large portion of sites within the Hoo St Werburgh and High Halstow wards are outside of the 400m distance. The proposed development at these sites could potentially have a minor negative impact on access to sustainable transport.

F.11.2 Proximity to railway station

F.11.2.1 There are seven railway stations located within Medway, including Halling Station, Cuxton Station, Rainham Station, Gillingham Station, Rochester Station, Chatham Station and Strood Station. Additionally, Snodland Station and Higham Station are located outside the MLP area close to the boundary. A large proportion of Medway's central areas are expected to have good access to these stations, however some sites in the north and south are located out of the sustainable 2km distance. Eight strategic sites (CHR4, RN8, RN9, RSE10, SMI5, SMI6, SNF3 and SR53) are located within 2km of an existing railway station, therefore the proposed development at these sites is likely to have a minor positive impact on access to rail services.

F.11.2.2 Site HHH22/HHH31 and Site HHH31 are located over 2km from an existing railway station, however the accompanying masterplan indicates a potential new railway station named 'Sharnal Street', which would involve restoring passenger services to a freight line. The proposal would significantly increase accessibility to the rail network on site and benefit sustainable transport options in the surrounding area including the adjacent strategic sites HHH22 and HHH35. The provision of a new station at Sites HHH22/HHH31 and Site

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HHH31 will be likely to have a major positive impact on access to rail services, whilst Site HHH22 and HHH35 would be located within sustainable distance to the proposed railway station and therefore be likely to have a minor positive impact on access to rail services.

F.11.2.3 The remaining 15 strategic sites are located over 2km from a railway station. The majority of these are located in the All Saints, Hoo St Werburgh and High Halstow, Lordswood and Walderslade, and Strood Rural wards. Two of these 15 sites (AS22 and SR17) include improved bus links that could provide minor improvements to sustainable access to railway stations. Overall, the proposed development at all 15 sites could potentially have a minor negative impact on site end users' access to rail services.

F.11.3 Pedestrian or cycle access

F.11.3.1 Sites with good pedestrian and cycle access include those with existing pavements, pathways or cycle lanes which are segregated from traffic use in the area. The pedestrian and cycle pathways are generally well distributed throughout Medway, particularly in the urban areas. A total of 16 sites are identified to be well connected to existing footpaths and/or cycle paths. The proposed development at these sites is likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and bicycle, and reducing the requirement for new pedestrian and cyclist access to be created.

F.11.3.2 Sites HHH36, CHR4 and RN9 are located in areas with poor access to the existing footpath network and cycle pathway. However, the accompanying masterplan and/or information provided by the Council for these three sites indicates the proposed development will include pedestrian and cycleway enhancements. Development at Site HHH36 will include development of a shared footway/cycleway along Eschol Road, the proposed development at Site CHR4 will include the delivery of new pedestrian and cycle linkages and the proposed development at Site RN9 will include the delivery of an active travel route through the site, including a cycling route. The development of the footway/cycleway enhancements will be likely to provide greater accessibility, and a minor positive impact is likely for local transport at all three sites.

F.11.3.3 However, eight sites (AS13, AS22, AS24, AS26, HHH6, LW8, RN8 and SNF3) currently have poor access to the existing footpath network and cycle pathways and at this stage no further details have been provided regarding any enhancements. The proposed development at these sites could potentially have a minor negative impact on local accessibility, and pedestrian/cyclist access would need improvement to be considered a viable transport option.

F.11.4 Access to local services

F.11.4.1 Six sites (AS13, AS21, AS22, HHH3, SMI5 and SMI6) are identified to provide sustainable pedestrian access to existing local shops and services, within a distance of 600m. Sites located in urban areas generally have better access to local services, in some cases multiple stores. These sites are likely to have a minor positive impact on access to local services for site end users.

F.11.4.2 The accompanying masterplans and/or site information provided by the Council indicates that 11 sites (CHR4, HHH12, HHH22, HHH26, HHH31, HHH35, RN8, RN9, RSE10, SR17 and SR9) will include the development of new local services. For example, Site RSE10 proposes a local centre, Site HHH22 proposes local services to support residential

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development (that would additionally benefit adjacent Sites HHH31 and HHH35), and Site SR17 includes the proposed development of shops and cafes. The proposed development at these 11 sites will locate site end users within sustainable walking distances to local shops and services. The proposed development at these 11 sites will be likely to have a minor positive impact on access to local services for site end users.

F.11.4.3 The remaining 10 strategic sites (AS24, AS26, HHH22/HHH31, HHH36, HHH6, HW1, LW6, LW8, SNF3 and SR53) are located wholly or partially outside of the 600m sustainable distance to local services. The majority of these are located in the rural areas of Medway. These sites are likely to have a minor negative impact on access to local services for site end users.

F.11.5 Public transport nodes

F.11.5.1 Sites located in Medway's urban areas have better access to a range of public transport options. Seven sites (CHR4, LW6, RN8, RN9, RSE10, SMI5 and SMI6) are located within 300m from bus stops on high frequency routes, and within 800m from a rail station via the road network. The proposed development at these sites is likely to have a major positive impact on sustainable access to public transport.

F.11.5.2 The remaining 20 sites do not lie within 300m from high frequency bus stops and 800m from a rail station. These sites are therefore likely to have a negligible impact on sustainable access to public transport (sustainable access to different modes of transport has been assessed separately within other receptors).

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Table F.11.1: *Strategic sites impact matrix for SA Objective 10 – Transport and accessibility*

Site ref	Proposed site use	Bus stop	Railway station	Access to PRoW or cycle network	Local services	Public transport accessibility
AS13	Residential led (mixed-use)	+	-	-	+	0
AS21	Residential led (mixed-use)	+	-	+	+	0
AS22	Residential led (mixed-use)	+	-	-	+	0
AS24	Non-residential	-	-	-	-	0
AS26	Non-residential	-	-	-	-	0
CHR4	Residential led (mixed-use)	+	+	+	+	++
HHH12	Residential led (mixed-use)	-	-	+	+	0
HHH22	Residential led (mixed-use)	-	+	+	+	0
HHH22/ HHH31	Residential led (mixed-use)	+	++	+	-	0
HHH26	Residential led (mixed-use)	+	-	+	+	0
HHH3	Residential led	-	-	+	+	0
HHH31	Residential led (mixed-use)	-	++	+	+	0
HHH35	Non-residential	-	+	+	+	0
HHH36	Non-residential	-	-	+	-	0
HHH6	Residential led (mixed-use)	-	-	-	-	0
HW1	Residential led	+	-	+	-	0
LW6	Residential led	+	-	+	-	++
LW8	Residential led	-	-	-	-	0
RN8	Residential led (mixed-use)	+	+	-	+	++
RN9	Residential led	+	+	+	+	++
RSE10	Residential led (mixed-use)	+	+	+	+	++
SMI5	Non-residential	+	+	+	+	++
SMI6	Residential led (mixed-use)	+	+	+	+	++
SNF3	Residential led	+	+	-	-	0
SR17	Residential led (mixed-use)	+	-	+	+	0
SR9	Residential led (mixed-use)	-	-	+	+	0
SR53	Residential led (mixed-use opportunity area)	+	+	+	-	0

F.12 SA Objective 11: Education

F.12.1 Primary school

F.12.1.1 There are 76 state funded, non-selective primary schools distributed throughout Medway. Six of the proposed residential led strategic sites (AS21, AS22, HH12, HHH13, LW6 and RSE10) are located within 800m of an existing primary school. Site AS22 is located within 800m of Peninsula East Primary School and the indicative masterplan for the site provides enhanced pedestrian routes for the primary school, enabling greater accessibility to primary education and encourage active modes of transport. Overall, all six sites are likely to have a minor positive impact on pedestrian access to primary schools, owing to their sustainable location in relation to surrounding primary schools.

F.12.1.2 However, some areas are likely to have more restricted access due to their rural location and the obstruction of the River Medway. Some 16 residential sites are located over 800m from an existing primary school. For seven of the 16 sites (AS13, HHH31, HW1, LW8, RN8, SMI6 and SR53), no information has been provided in terms of social infrastructure that will provide greater accessibility to primary schools and are therefore likely to have a minor negative impact on pedestrian access to primary schools.

F.12.1.3 Site CHR4 is partially located over 800m from an existing primary school (Halling Primary School). However, the indicative masterplan for the site includes provision of three new onsite primary schools. In addition, the proposal for the site includes new pedestrian, cycle and public transport linkages that will allow sustainable transport to the existing and proposed primary schools. Overall, owing to the improved accessibility to primary schools by sustainable transport linkages and the provision of three onsite primary schools, a major positive impact on pedestrian access to primary schools is likely.

F.12.1.4 Site HHH22/31 and Site HHH22 are both located approximately 1.2km from the nearest primary school, St Werburgh Primary School; however, the site masterplan for these two sites includes the provision of an on-site primary school. The majority of Site HHH26 is located over 800m from High Halstow Primary School; however, the site masterplan includes the provision of an onsite primary school and *"new vehicular access points, car and cycle facilities"*. Site HHH6 is partially located within 800m to Chattenden Primary School, although information provided by the Council indicates provision of an onsite primary school. The majority of Site SR17 is located over 800m from Wainscott Primary School, although the site masterplan includes the provision of an on-site primary school alongside new footpaths and cycle routes to facilitate active modes of travel. The majority of Site RN9 is located over 800m from the nearest primary school, Thames View Primary School; however, the accompanying masterplan to Site RN9 includes the provision of an onsite primary school. Site SR9 is wholly located over 800m from an existing primary school, with the nearest primary school being 1.2km away (Cliffe Woods Primary School). Information provided by the Council indicates the site will include a new primary school, improving pedestrian accessibility to primary education. Overall, owing to the proposal of new primary schools and improved transport infrastructure, a minor positive impact on pedestrian access to primary schools is likely across all six sites.

F.12.1.5 Site SNF3 is partially located over 800m from an existing primary school, where a small proportion in the east is located within 800m to Temple Mill Primary School. Information provided by the Council includes the provision of an on-site school within the masterplan,

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however, the type of school is unknown at the time of writing. Additionally, the site proposes *"safe routes to school"* and *"walking bus strategies"* which may encourage active modes of transport to schools, increasing accessibility to primary education. Overall, owing to the unknown nature and capacity of the school, a negligible impact is identified on pedestrian access to primary schools for Site SNF3.

F.12.1.6 Five strategic sites (AS24, AS26, HHH35, HHH36 and SMI5) are proposed for non-residential use, and are therefore likely to have a negligible impact on access to primary schools.

F.12.2 Secondary school

F.12.2.1 There are 14 state-funded, non-selective secondary schools distributed throughout Medway. Seven proposed residential sites (HHH12, HHH6, LW6, RSE10, SMI6, SR17 and SR53) are located within 1.5km of an existing secondary school. The site masterplan for Site SR17 includes improvements to the surrounding transport infrastructure that will help to increase sustainable access to secondary education, including the introduction of a new bus route through the site and new pedestrian and cycle routes, accompanied by an accessibility appraisal. The development at Site SR17 and the remaining five sites will be likely to have a minor positive impact on sustainable access to secondary schools.

F.12.2.2 However, some areas are likely to have more restricted access due to their rural location and the obstruction of the River Medway. Some 15 residential-led sites are located over 1.5km from an existing secondary school. The proposed development at two sites (CHR4 and SNF3) includes the development of a new school onsite, however, only Site CHR4 identifies the school as being a secondary school; the type of the schools proposed at Site SNF3 are unknown. Site SNF3 are therefore identified to have a negligible impact on sustainable access to secondary schools.

F.12.2.3 The site masterplans for Site CHR4 and Sites HHH22 and HHH22/HHH31 include enhancements to transport infrastructure (as well as the development of a new secondary school), which includes new pedestrian, cycle and public transport linkages that will increase accessibility to proposed and existing secondary schools. The development at Sites CHR4, HHH22 and HHH22/HHH31 is likely to have a major positive impact on sustainable access to secondary schools, owing to the development of a new secondary school and the supporting transport infrastructure. The accompanying masterplan for Site RN9 includes the provision of an on-site secondary school and is likely to have a minor positive impact on sustainable access to secondary schools.

F.12.2.4 The proposed development at the remaining 10 sites (AS13, AS21, AS22, HHH26, HHH3, HHH31, HW1, LW8, RN8 and SR9) is likely to have a minor negative impact on sustainable access to secondary schools, as no information has been provided in terms of new or improved schools or transport infrastructure to provide greater accessibility to secondary schools.

F.12.2.5 Five strategic sites (AS24, AS26, HHH35, HHH36 and SMI5) are proposed for non-residential use, and are therefore likely to have a negligible impact on access to secondary schools.

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F.12.3 Further education

F.12.3.1 There are several further educational facilities distributed throughout Medway. These include the shared Universities at Medway Campus and MidKent College. Sites SMI6 and SR53 are the only residential-led site located within 3km of a further educational facility. The proposed development at these two sites is likely to have a minor positive impact on access to higher education facilities.

F.12.3.2 The remaining residential-led sites are located over 3km from a further education facility, and the proposed development at these sites is likely to have a negligible impact on access to further education in Medway.

F.12.3.3 Five strategic sites (AS24, AS26, HHH35, HHH36 and SMI5) are proposed for non-residential use, and are therefore likely to have a negligible impact on access to further education.

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Table F.12.1: *Strategic sites impact matrix for SA Objective 11 – Education*

Site ref	Proposed site use	Primary school	Secondary school	Further education
AS13	Residential led (mixed-use)	-	-	0
AS21	Residential led (mixed-use)	+	-	0
AS22	Residential led (mixed-use)	+	-	0
AS24	Non-residential	0	0	0
AS26	Non-residential	0	0	0
CHR4	Residential led (mixed-use)	++	++	0
HHH12	Residential led (mixed-use)	+	+	0
HHH22	Residential led (mixed-use)	+	++	0
HHH22/ HHH31	Residential led (mixed-use)	+	++	0
HHH26	Residential led (mixed-use)	+	-	0
HHH3	Residential led	+	-	0
HHH31	Residential led (mixed-use)	-	++	0
HHH35	Non-residential	0	0	0
HHH36	Non-residential	0	0	0
HHH6	Residential led (mixed-use)	+	-	0
HW1	Residential led	-	-	0
LW6	Residential led	+	-	0
LW8	Residential led	-	-	0
RN8	Residential led (mixed-use)	-	+	0
RN9	Residential led	+	0	0
RSE10	Residential led (mixed-use)	+	+	0
SMI5	Non-residential	0	0	0
SMI6	Residential led (mixed-use)	-	+	0
SNF3	Residential led	0	0	0
SR17	Residential led (mixed-use)	+	-	0
SR9	Residential led (mixed-use)	+	-	0
SR53	Residential led (mixed-use opportunity area)	-	+	+

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F.13 SA Objective 12: Economy and employment

F.13.1 Access to major employment locations

F.13.1.1 Approximately 37 major employment locations have currently been identified within Medway. These are distributed across Medway, although the north west currently lacks access to major employment locations. All of the proposed residential or mixed-use strategic development sites (22 sites) are within the sustainable target distance of 5km to one or more major employment locations. The proposed development at these 22 sites is therefore expected to provide sustainable access to employment opportunities, and therefore result in a minor positive impact.

F.13.1.2 The remaining five sites (AS24, AS26, HHH35, HHH36 and SMI5) are all allocated for non-residential uses and are likely to have a negligible impact on access to major employment locations.

F.13.2 Employment floorspace provision

F.13.2.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.

F.13.2.2 There are five strategic sites (AS24, AS26, HHH35, HHH36 and SMI5) proposed for non-residential uses. Site HHH35 currently comprises vacant land, and the accompanying masterplan indicates that employment zones will be included across the site. The proposed development at Site HHH35 is therefore expected to result in a significant net gain in employment floorspace and is likely to result in a major positive impact in terms of increasing the provision of employment opportunities. Sites AS24, AS26, HHH36 and SMI5 coincide with existing employment areas. Site AS24 is located on an energy park, Site AS26 is located on a national grid site, Site SMI5 is located on a large commercial/industrial area, and the accompanying masterplan for Site HHH36 indicates large proportions of the site will be used for open space and environmental enhancements, with some areas outlined for development. It is uncertain whether proposed development at Sites AS24, AS26, HHH36 and SMI5 will result in a net change in employment floorspace.

F.13.2.3 Of the remaining 22 residential-led sites, two sites (AS13 and LW6) are located on previously undeveloped land and within their accompanying masterplans indicate no employment development. These two sites are likely to have a negligible impact on employment floorspace. Some 18 of the residential-led sites will include some employment-generating uses within their accompanying masterplan and/or information provided by the Council. For example, Site AS22 includes the proposed development of shops, a pub and a restaurant, Site CHR4 includes a hotel and a pub, and Site SR17 includes a primary school, shops, cafes and a care home. The proposed development at these 18 sites could potentially result in a major positive impact in terms of increasing the provision of local employment opportunities.

F.13.2.4 Site SMI6 is proposed for residential-led mixed use, and is located on a large commercial/industrial area at Chatham Docks. Whilst available masterplan information

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indicates a proportion of the site to be used for retail and commercial uses, it is uncertain whether this would lead to an overall net change in employment floorspace and jobs in comparison to the current land use.

F.13.2.5 Site SR53 proposed for an opportunity area for mixed uses including residential, and within the accompanying masterplan information also proposes 970sqm of commercial space. However, the site is located within a large existing commercial area, and it is uncertain whether the proposed development will result in a net change in employment floorspace.

Table F.13.1: *Strategic sites impact matrix for SA Objective 12 – Economy and employment*

Site ref	Proposed site use	Employment floorspace	Access to primary employment location
AS13	Residential led (mixed-use)	0	+
AS21	Residential led (mixed-use)	++	+
AS22	Residential led (mixed-use)	++	+
AS24	Non-residential	+/-	0
AS26	Non-residential	+/-	0
CHR4	Residential led (mixed-use)	++	+
HHH12	Residential led (mixed-use)	++	+
HHH22	Residential led (mixed-use)	++	+
HHH22/HHH31	Residential led (mixed-use)	++	+
HHH26	Residential led (mixed-use)	++	+
HHH3	Residential led	++	+
HHH31	Residential led (mixed-use)	++	+
HHH35	Non-residential	++	0
HHH36	Non-residential	+/-	0
HHH6	Residential led (mixed-use)	++	+
HW1	Residential led	++	+
LW6	Residential led	0	+
LW8	Residential led	++	+
RN8	Residential led (mixed-use)	++	+
RN9	Residential led	++	+
RSE10	Residential led (mixed-use)	++	+
SMI5	Non-residential	+/-	0
SMI6	Residential led (mixed-use)	+/-	+
SNF3	Residential led	++	+
SR17	Residential led (mixed-use)	++	+
SR9	Residential led (mixed-use)	++	+
SR53	Residential led (mixed-use opportunity area)	+/-	+

Appendix G: Reasonable Alternative Site Assessments

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G.1 Introduction

G.1.1 Overview

G.1.1.1 A total of 335 reasonable alternative sites have been identified by Medway Council during the preparation of the Medway Local Plan (MLP). This includes the following uses:

- 200 sites identified for residential use;
- 47 sites identified for non-residential use;
- 87 sites identified for mixed uses; and
- One site identified for either residential or non-residential use.

G.1.1.2 A further 27 strategic sites have been identified by the Council, based on capacity and size thresholds, and are evaluated within **Appendix E**.

G.1.1.3 Since the Regulation 18 stage, the Council has provided updated site information for 51 reasonable alternative sites, including capacity changes and change of the proposed site use, taking into account the latest information from the Land Availability Assessment. These 51 reasonable alternative sites are highlighted in blue in **Table G.1.1**.

G.1.1.4 The assessments presented within this document therefore supersede the assessment information presented in Appendix E of the Regulation 18 Interim SA Report (2024)[1].

G.1.1.5 The location of the 335 non-strategic reasonable alternative sites is shown in **Figures G.1.1 - G.1.7**, and their potential uses are identified in **Table G.1.1**.

G.1.1.6 Each of the sites appraised within this report have been assessed for likely impacts on each of the 12 SA Objectives, as outlined in the SA Framework (see **Appendix B**). Likely sustainability impacts have been set out in **Tables G.2.1 – G.13.1** within each SA Objective chapter, in accordance with the site assessment methodology set out in **Appendix E**, as well as the methodology information set out in **Chapter 4** of the main SA Report.

G.1.1.7 The receptor-only impacts, based on the red line boundary and site proposal information provided by Medway Council, help to identify the potential impacts on site if there were no policy or mitigation. The potential mitigating influence of the MLP policies is considered within **Appendix I**.

G.1.1.8 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the Council as well as expert judgement.

[1] Lepus Consulting (2024). Sustainability Appraisal of the Medway Local Plan (2025-2041). Regulation 18 Interim SA Report. June 2024. Available at: https://medway.oc2.uk/document/20 [Date accessed: 25/04/25]

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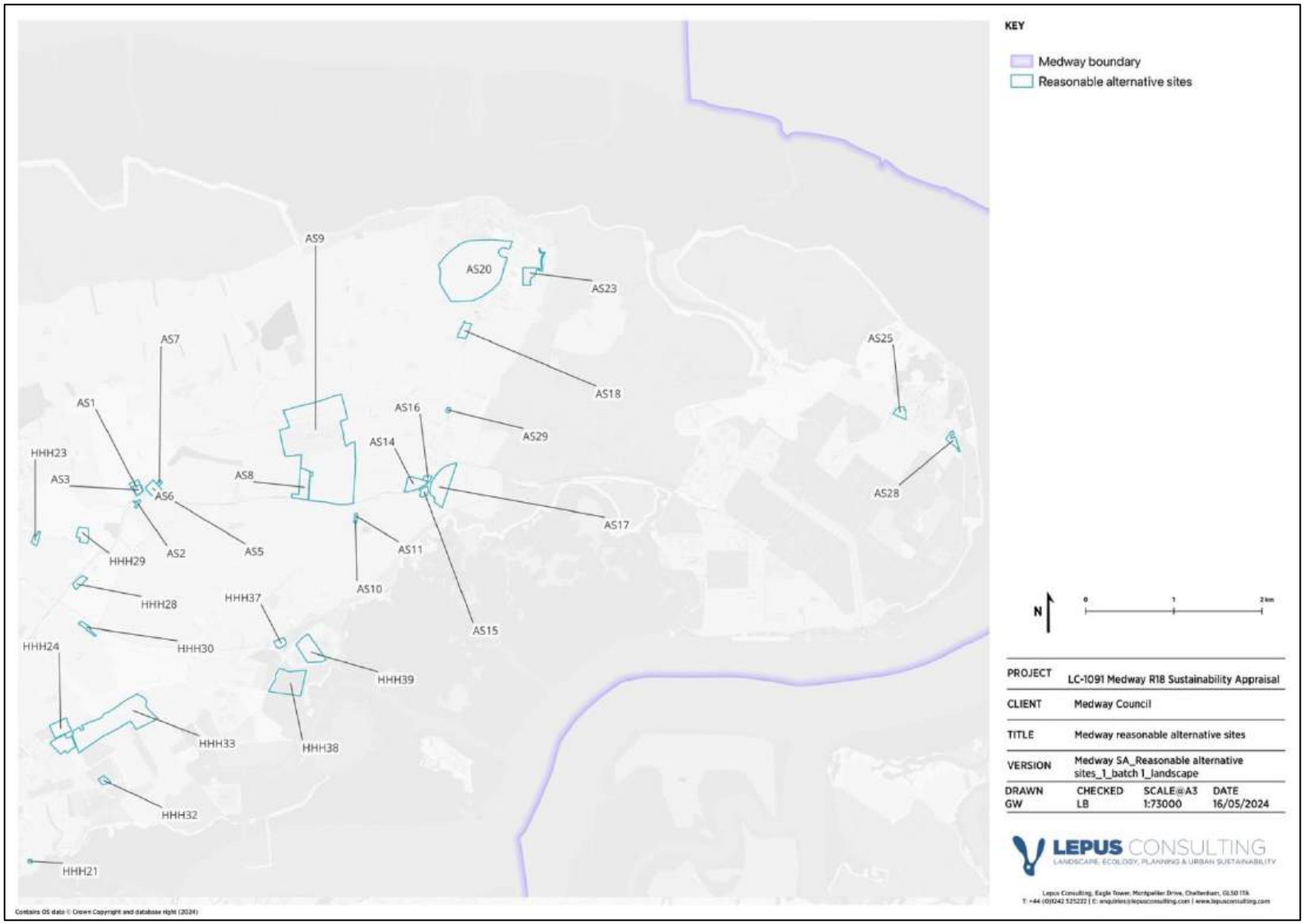

Figure G.1.1: *Reasonable alternative sites within the north east of Medway*

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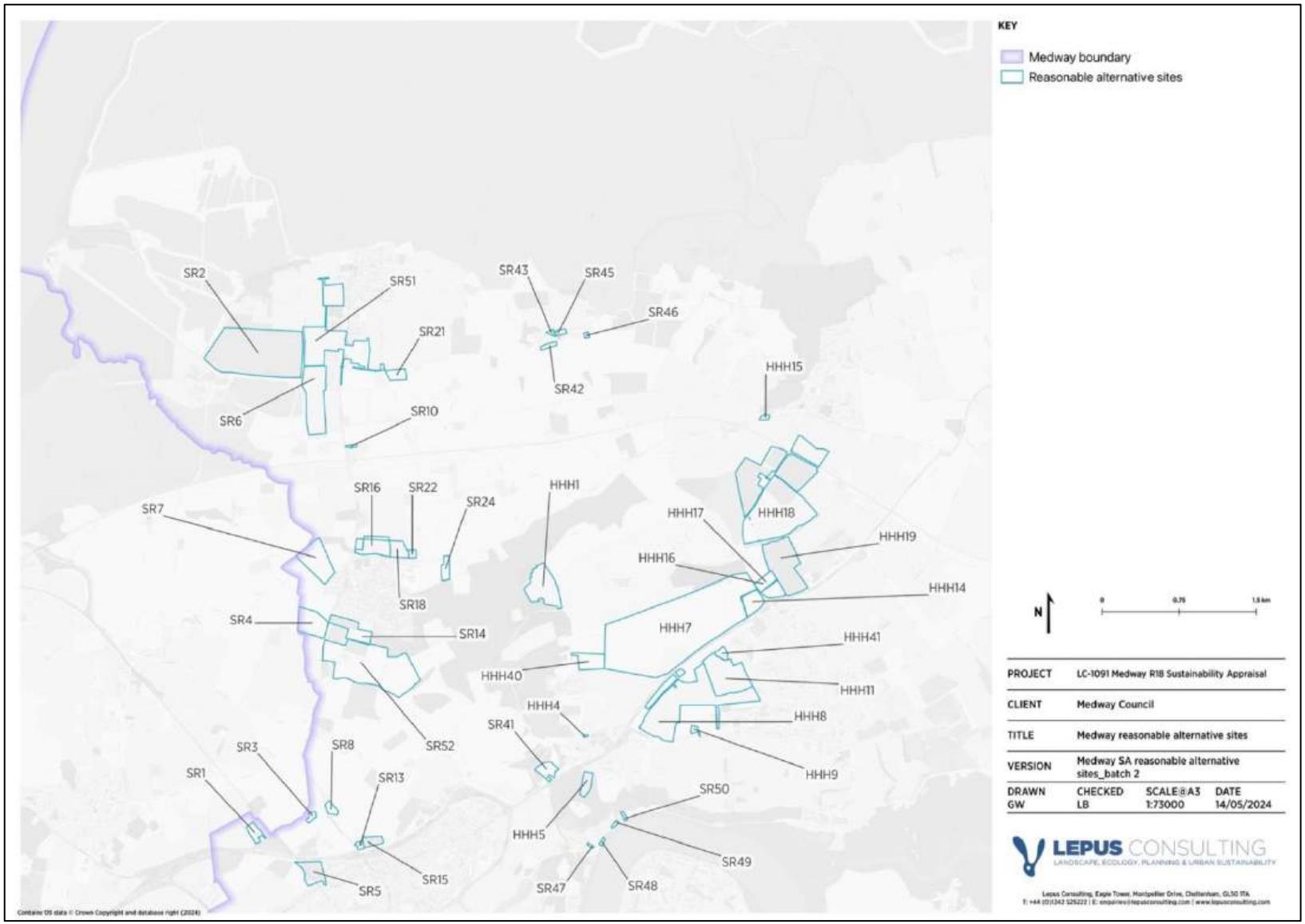

Figure G.1.2: *Reasonable alternative sites within the north west of Medway*

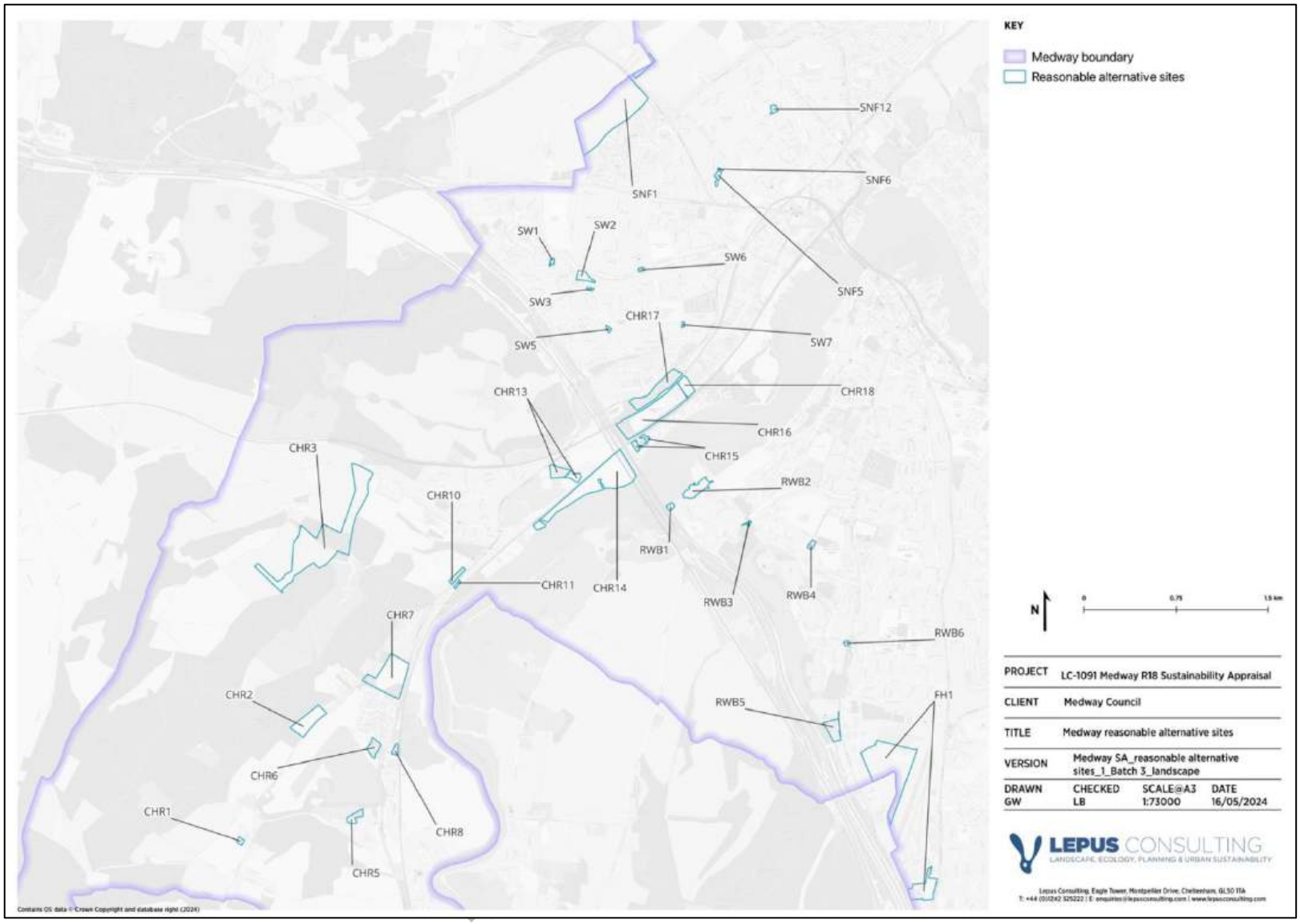

Figure G.1.3: *Reasonable alternative sites within the south west of Medway*

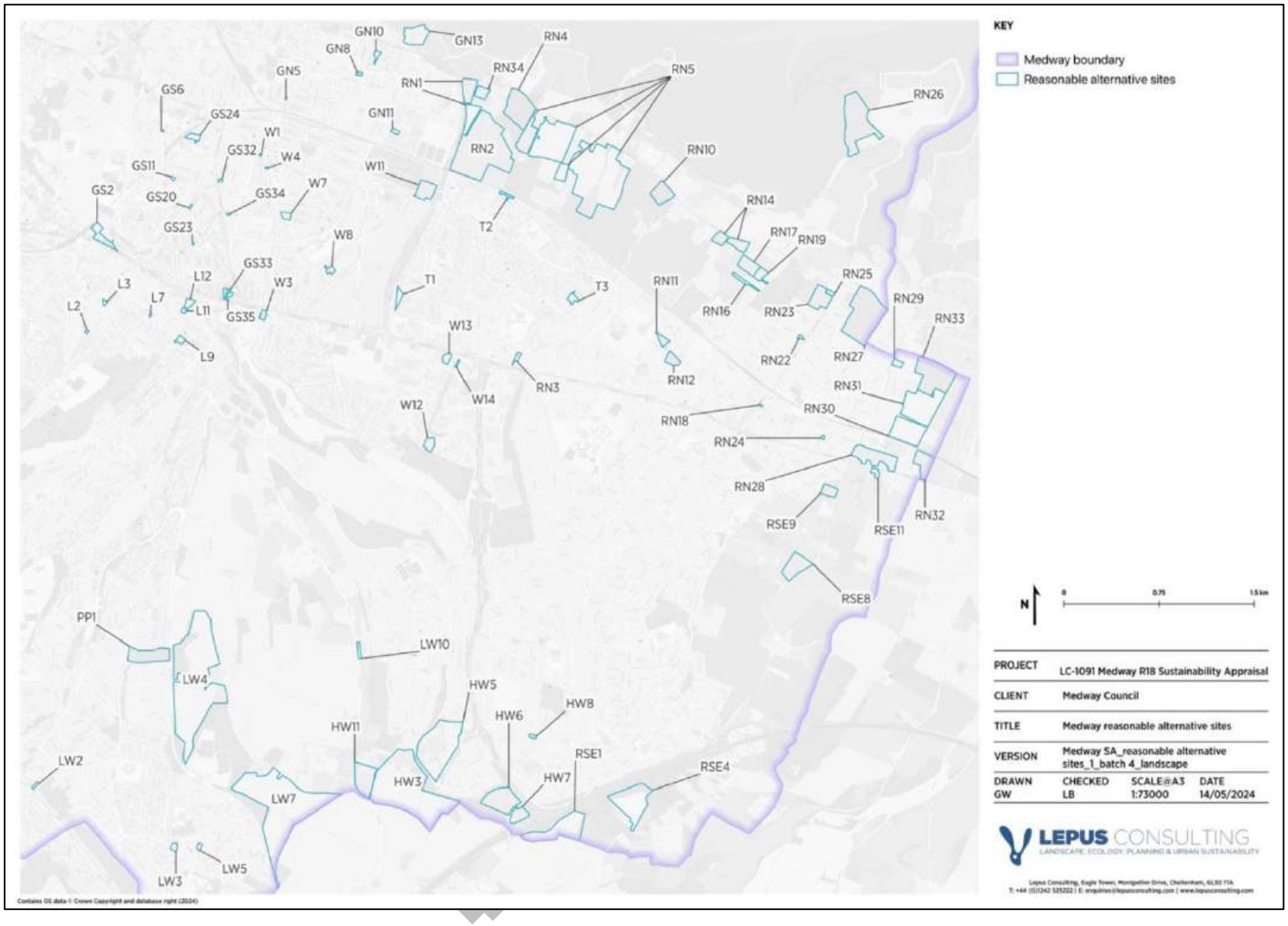

Figure G.1.4: *Reasonable alternative sites within the south east of Medway*

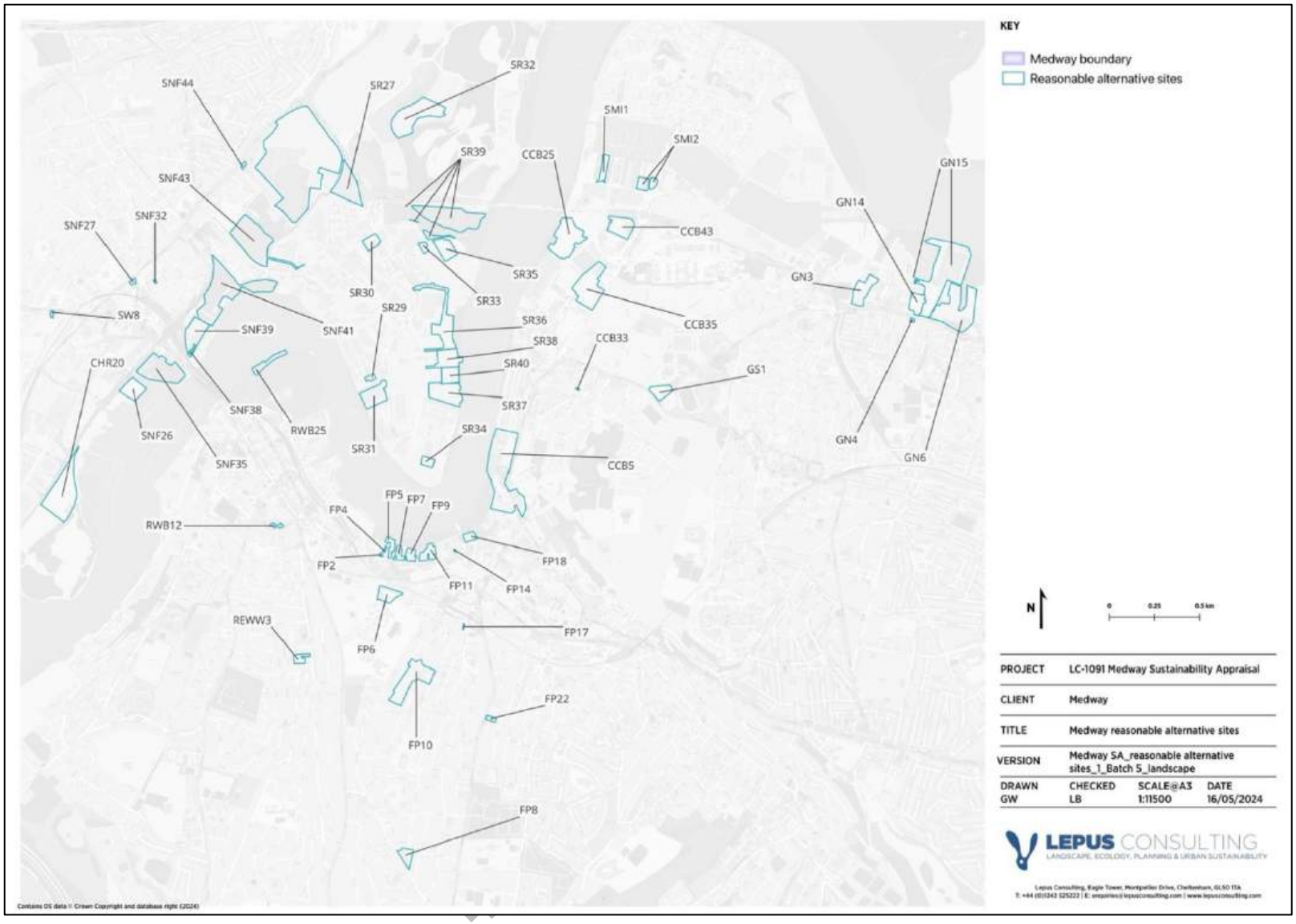

Figure G.1.5: *Reasonable alternative sites within the centre and urban waterfront of Medway*

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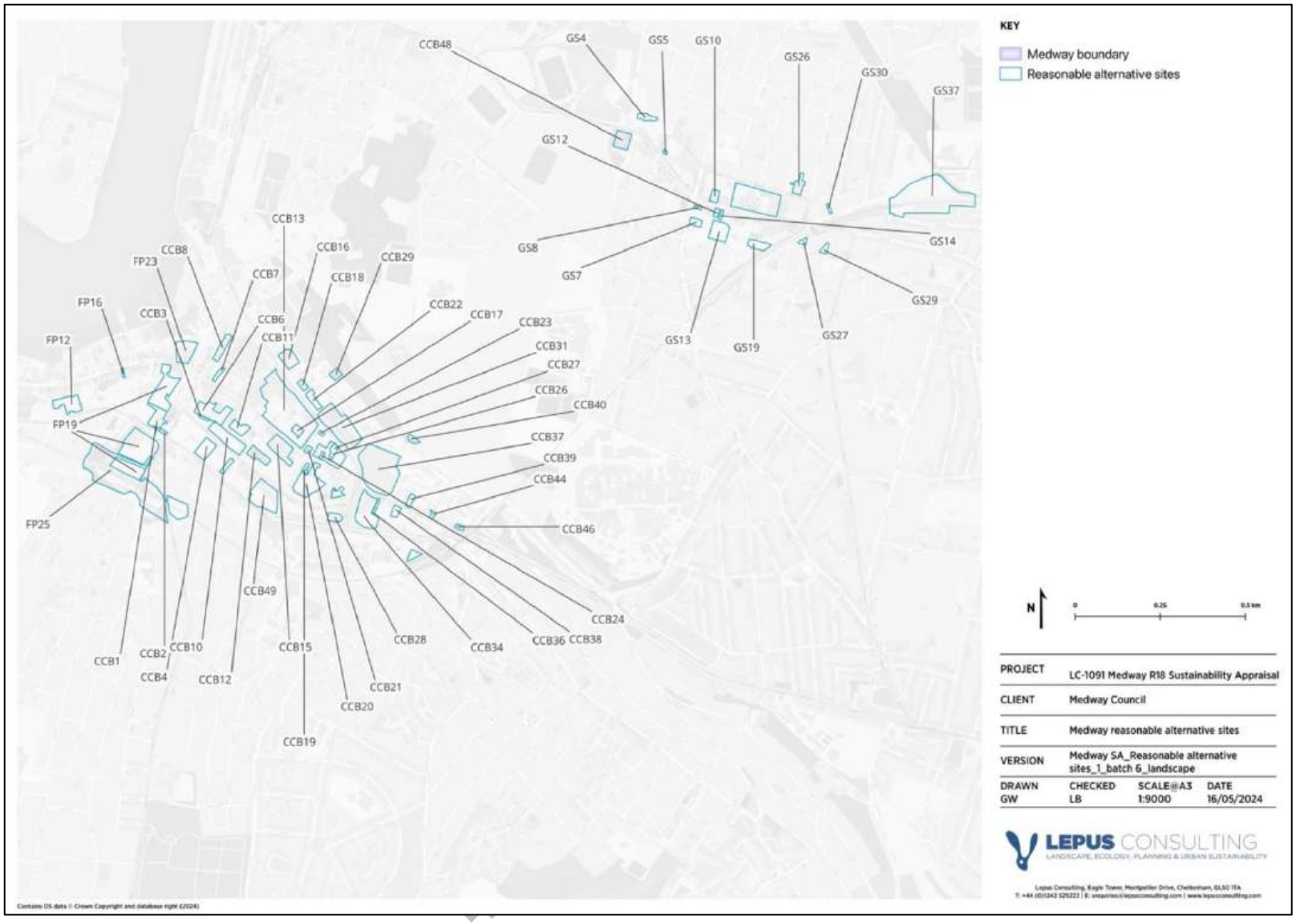

Figure G.1.6: *Reasonable alternative sites within the centre and urban core of Medway*

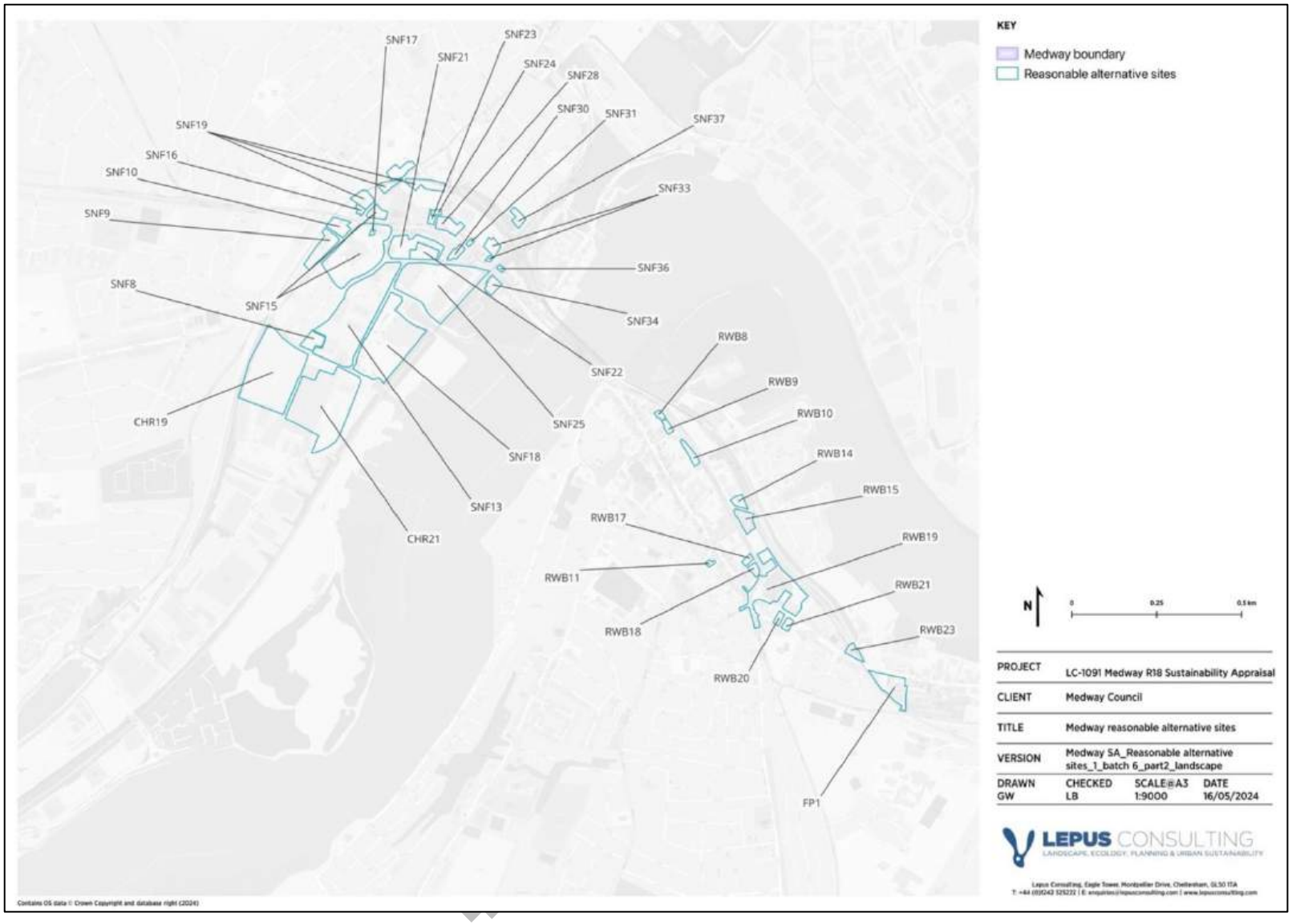

Figure G.1.7: *Reasonable alternative sites within the centre and urban waterfront of Medway*

Table G.1.1: *Reasonable alternative sites in Medway (amended sites at Regulation 19 highlighted in blue)*

Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
AS1	All Saints	Residential led	1.48	20
AS10	All Saints	Residential led	0.18	5
AS11	All Saints	Residential led (mixed-use)	0.17	10
AS14	All Saints	Residential led	2.72	25
AS15	All Saints	Residential led	0.86	15
AS16	All Saints	Residential led (mixed-use)	0.47	25
AS17	All Saints	Residential led	7.83	180
AS18	All Saints	Residential led	1.69	48
AS2	All Saints	Residential led	0.34	4
AS20	All Saints	Residential led (mixed-use)	41.90	390
AS23	All Saints	Residential led (park homes)	2.84	0
AS25	All Saints	Residential led	1.29	34
AS28	All Saints	Residential led	1.21	9
AS29	All Saints	Residential led	0.23	7
AS3	All Saints	Residential led	0.86	14
AS5	All Saints	Residential led (mixed-use)	2.35	40
AS6	All Saints	Residential led (mixed-use)	2.35	40
AS7	All Saints	Non-residential	0.24	0
AS8	All Saints	Non-residential	4.13	0
AS9	All Saints	Non-residential	71.95	0
CCB1	Chatham Central & Brompton	Residential led	0.23	12
CCB10	Chatham Central & Brompton	Residential led (mixed-use)	0.39	72
CCB11	Chatham Central & Brompton	Residential led	0.15	30
CCB12	Chatham Central & Brompton	Residential led (mixed-use)	0.18	24
CCB13	Chatham Central & Brompton	Residential led (mixed-use)	1.85	212
CCB15	Chatham Central & Brompton	Residential led (mixed-use)	0.34	60
CCB16	Chatham Central & Brompton	Residential led	0.21	26
CCB17	Chatham Central & Brompton	Residential led (mixed-use)	0.08	14
CCB18	Chatham Central & Brompton	Residential led	0.06	193
CCB19	Chatham Central & Brompton	Residential led (mixed-use)	0.04	13
CCB2	Chatham Central & Brompton	Residential led (mixed-use)	0.03	6
CCB20	Chatham Central & Brompton	Residential led (mixed-use)	0.50	98
CCB21	Chatham Central & Brompton	Residential led (mixed-use)	0.04	14
CCB22	Chatham Central & Brompton	Residential led	0.11	14
CCB23	Chatham Central & Brompton	Residential led (mixed-use)	0.02	5
CCB24	Chatham Central & Brompton	Residential led (mixed-use)	0.02	9
CCB25	Chatham Central & Brompton	Residential led	2.64	150
CCB26	Chatham Central & Brompton	Residential led (mixed-use)	0.43	49
CCB27	Chatham Central & Brompton	Residential led (mixed-use)	0.06	20
CCB28	Chatham Central & Brompton	Residential led	0.09	11
CCB29	Chatham Central & Brompton	Residential led	0.07	5
CCB3	Chatham Central & Brompton	Residential led (mixed-use)	0.03	13
CCB30	Chatham Central & Brompton	Residential led (mixed-use)	0.08	21
CCB31	Chatham Central & Brompton	Residential led	0.80	179
CCB33	Chatham Central & Brompton	Residential led	0.02	6
CCB34	Chatham Central & Brompton	Residential led (mixed-use)	0.51	36
CCB35	Chatham Central & Brompton	Non-residential	2.70	0
CCB36	Chatham Central & Brompton	Residential led (mixed-use)	0.03	7
CCB37	Chatham Central & Brompton	Residential led (mixed-use)	1.31	200
CCB38	Chatham Central & Brompton	Residential led	0.07	8
CCB39	Chatham Central & Brompton	Residential led	0.06	24
CCB4	Chatham Central & Brompton	Residential led	0.22	50
CCB40	Chatham Central & Brompton	Residential led	0.05	3
CCB41	Chatham Central & Brompton	Residential led	0.07	7
CCB43	Chatham Central & Brompton	Residential led	1.32	60
CCB44	Chatham Central & Brompton	Residential led	0.03	2
CCB46	Chatham Central & Brompton	Residential led	0.03	2

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Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
CCB48	Chatham Central & Brompton	Residential led	0.22	27
CCB49	Chatham Central & Brompton	Residential led	0.55	150
CCB5	Chatham Central & Brompton	Non-residential	5.93	0
CCB6	Chatham Central & Brompton	Residential led (mixed-use)	0.39	50
CCB7	Chatham Central & Brompton	Residential led (mixed-use)	0.05	9
CCB8	Chatham Central & Brompton	Residential led	0.16	164
CCB9	Chatham Central & Brompton	Residential led	0.06	32
CHR1	Cuxton, Halling & Riverside	Residential led	0.24	11
CHR10	Cuxton, Halling & Riverside	Residential led	0.55	8
CHR11	Cuxton, Halling & Riverside	Residential led	0.14	8
CHR13	Cuxton, Halling & Riverside	Residential led (Gypsy and Traveller)	1.83	10 pitches/ plots
CHR14	Cuxton, Halling & Riverside	Residential led (mixed-use)	11.40	49
CHR15	Cuxton, Halling & Riverside	Non-residential	0.60	0
CHR16	Cuxton, Halling & Riverside	Non-residential	8.95	0
CHR17	Cuxton, Halling & Riverside	Non-residential	3.73	0
CHR18	Cuxton, Halling & Riverside	Non-residential	1.28	0
CHR19	Cuxton, Halling & Riverside	Non-residential	3.10	0
CHR2	Cuxton, Halling & Riverside	Non-residential	3.01	0
CHR20	Cuxton, Halling & Riverside	Residential led	3.69	172
CHR21	Cuxton, Halling & Riverside	Non-residential	3.20	0
CHR3	Cuxton, Halling & Riverside	Non-residential	19.57	0
CHR5	Cuxton, Halling & Riverside	Non-residential	0.78	0
CHR6	Cuxton, Halling & Riverside	Residential led	1.00	88
CHR7	Cuxton, Halling & Riverside	Residential led	6.76	193
CHR8	Cuxton, Halling & Riverside	Non-residential	0.34	0
FH1	Fort Horsted	Non-residential	14.91	0
FP1	Fort Pitt	Residential led	0.60	28
FP10	Fort Pitt	Residential led	2.46	139
FP11	Fort Pitt	Residential led (mixed-use)	0.59	123
FP12	Fort Pitt	Residential led	0.28	70
FP14	Fort Pitt	Residential led	0.01	7
FP16	Fort Pitt	Residential led (mixed-use)	0.02	6
FP17	Fort Pitt	Residential led	0.02	5
FP18	Fort Pitt	Residential led	0.32	40
FP19	Fort Pitt	Residential led	1.66	146
FP2	Fort Pitt	Residential led	0.03	1
FP22	Fort Pitt	Residential led	0.14	12
FP23	Fort Pitt	Residential led	0.32	63
FP25	Fort Pitt	Residential led (mixed-use)	2.59	121
FP4	Fort Pitt	Residential led	0.03	1
FP5	Fort Pitt	Residential led	0.34	42
FP6	Fort Pitt	Residential led	0.78	102
FP7	Fort Pitt	Residential led	0.31	39
FP8	Fort Pitt	Residential led	0.54	20
FP9	Fort Pitt	Residential led	0.35	43
GN10	Gillingham North	Residential led	0.26	5
GN11	Gillingham North	Residential led	0.20	9
GN13	Gillingham North	Residential led	2.41	98
GN14	Gillingham North	Residential led	0.79	81
GN15	Gillingham North	Residential led (mixed-use)	5.87	1100
GN3	Gillingham North	Residential led	1.24	176
GN4	Gillingham North	Residential led	0.05	8
GN5	Gillingham North	Residential led	0.02	5
GN6	Gillingham North	Residential led (mixed-use)	3.86	500
GN8	Gillingham North	Residential led	0.12	17
GS1	Gillingham South	Residential led	0.70	53
GS10	Gillingham South	Residential led (mixed-use)	0.08	18

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Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
GS11	Gillingham South	Residential led	0.07	8
GS12	Gillingham South	Residential led (mixed-use)	0.04	8
GS13	Gillingham South	Residential led	0.28	12
GS14	Gillingham South	Residential led (mixed-use)	0.03	6
GS18	Gillingham South	Residential led (mixed-use)	0.94	18
GS19	Gillingham South	Residential led	0.14	57
GS2	Gillingham South	Residential led	1.28	45
GS20	Gillingham South	Residential led	0.04	5
GS23	Gillingham South	Residential led	0.03	5
GS24	Gillingham South	Residential led	0.48	18
GS26	Gillingham South	Residential led	0.14	14
GS27	Gillingham South	Residential led (mixed-use)	0.03	6
GS29	Gillingham South	Residential led	0.05	18
GS30	Gillingham South	Residential led	0.02	5
GS32	Gillingham South	Residential led	0.07	9
GS33	Gillingham South	Residential led	0.25	12
GS34	Gillingham South	Residential led	0.04	8
GS35	Gillingham South	Residential led	0.21	12
GS37	Gillingham South	Residential led (mixed-use)	1.90	136
GS4	Gillingham South	Residential led	0.09	24
GS5	Gillingham South	Residential led	0.01	7
GS6	Gillingham South	Residential led	0.03	5
GS7	Gillingham South	Residential led (mixed-use)	0.07	14
GS8	Gillingham South	Residential led (mixed-use)	0.02	6
HHH1	Hoo St Werburgh & High Halstow	Non-residential	9.40	0
HHH11	Hoo St Werburgh & High Halstow	Residential led	12.10	240
HHH14	Hoo St Werburgh & High Halstow	Residential led	6.03	120
HHH15	Hoo St Werburgh & High Halstow	Residential led	0.40	5
HHH16	Hoo St Werburgh & High Halstow	Non-residential	2.11	0
HHH17	Hoo St Werburgh & High Halstow	Residential led	2.24	70
HHH18	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	54.92	Uncertain
HHH19	Hoo St Werburgh & High Halstow	Non-residential	13.90	0
HHH21	Hoo St Werburgh & High Halstow	Non-residential	0.16	0
HHH23	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	0.87	15
HHH24	Hoo St Werburgh & High Halstow	Residential led	3.18	85
HHH25	Hoo St Werburgh & High Halstow	Residential led	3.78	80
HHH28	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	1.14	50
HHH29	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	1.91	55
HHH30	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	0.81	30
HHH32	Hoo St Werburgh & High Halstow	Residential led	0.79	3
HHH33	Hoo St Werburgh & High Halstow	Residential led	23.51	330
HHH37	Hoo St Werburgh & High Halstow	Non-residential	1.05	0
HHH38	Hoo St Werburgh & High Halstow	Non-residential	9.15	0
HHH39	Hoo St Werburgh & High Halstow	Non-residential	5.91	0
HHH4	Hoo St Werburgh & High Halstow	Residential led	0.09	8
HHH40	Hoo St Werburgh & High Halstow	Residential led	4.02	75
HHH41	Hoo St Werburgh & High Halstow	Residential led	0.99	25
HHH5	Hoo St Werburgh & High Halstow	Residential led	1.96	50
HHH7	Hoo St Werburgh & High Halstow	Residential led	79.68	300
HHH8	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	30.81	450
HHH9	Hoo St Werburgh & High Halstow	Residential led	0.48	6
HW11	Hempstead & Wigmore	Residential led	3.35	60
HW3	Hempstead & Wigmore	Residential led (mixed-use – including secondary school)	21.03	75
HW5	Hempstead & Wigmore	Non-residential	10.37	0
HW6	Hempstead & Wigmore	Residential led	4.00	88
HW7	Hempstead & Wigmore	Residential or non-residential	1.24	Uncertain
HW8	Hempstead & Wigmore	Residential led	0.16	5
L11	Luton	Residential led	0.13	7

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Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
L12	Luton	Residential led	0.41	13
L2	Luton	Residential led	0.07	5
L3	Luton	Residential led	0.11	7
L7	Luton	Residential led	0.04	6
L9	Luton	Residential led	0.31	22
LW10	Lordswood & Walderslade	Residential led	0.31	5
LW2	Lordswood & Walderslade	Residential led	0.13	18
LW3	Lordswood & Walderslade	Residential led	0.27	17
LW4	Lordswood & Walderslade	Residential led	27.41	670
LW5	Lordswood & Walderslade	Residential led (C2 use)	0.18	5
LW7	Lordswood & Walderslade	Residential led	23.13	450
PP1	Princes Park	Residential led	3.25	15
REWW3	Rochester East & Warren Wood	Residential led	0.34	11
RN1	Rainham North	Residential led	3.37	100
RN10	Rainham North	Residential led	2.04	40
RN11	Rainham North	Residential led	0.50	20
RN12	Rainham North	Non-residential	0.82	0
RN14	Rainham North	Residential led	1.98	26
RN16	Rainham North	Residential led	0.46	20
RN17	Rainham North	Residential led	1.56	33
RN18	Rainham North	Residential led	0.04	8
RN19	Rainham North	Residential led	0.74	8
RN2	Rainham North	Residential led (mixed-use)	16.09	211
RN22	Rainham North	Residential led	0.10	8
RN23	Rainham North	Residential led	2.19	75
RN24	Rainham North	Residential led	0.06	9
RN25	Rainham North	Residential led	0.22	5
RN26	Rainham North	Residential led (mixed-use)	7.66	12
RN27	Rainham North	Residential led	9.16	200
RN28	Rainham North	Residential led	3.68	74
RN29	Rainham North	Residential led	0.38	14
RN3	Rainham North	Residential led	0.22	9
RN30	Rainham North	Residential led	4.31	90
RN31	Rainham North	Residential led	6.44	80
RN32	Rainham North	Residential led	2.06	46
RN33	Rainham North	Non-residential	6.23	0
RN34	Rainham North	Residential led	0.86	21
RN4	Rainham North	Residential led (mixed-use)	4.84	100
RN5	Rainham North	Residential led (mixed-use)	30.23	400
RSE1	Rainham South East	Non-residential (road spur and open space)	5.72	0
RSE11	Rainham South East	Non-residential	0.33	0
RSE4	Rainham South East	Residential led	5.98	2
RSE8	Rainham South East	Residential led (mixed-use)	2.68	25
RSE9	Rainham South East	Residential led	0.90	40
RWB1	Rochester West & Borstal	Residential led	0.27	12
RWB10	Rochester West & Borstal	Non-residential	0.14	0
RWB11	Rochester West & Borstal	Residential led	0.03	5
RWB12	Rochester West & Borstal	Residential led	0.13	3
RWB14	Rochester West & Borstal	Residential led	0.12	15
RWB15	Rochester West & Borstal	Residential led	0.26	23
RWB17	Rochester West & Borstal	Residential led	0.06	3
RWB18	Rochester West & Borstal	Residential led	0.09	4
RWB19	Rochester West & Borstal	Residential led (mixed-use)	1.57	246
RWB2	Rochester West & Borstal	Residential led	1.78	36
RWB20	Rochester West & Borstal	Residential led	0.08	15
RWB21	Rochester West & Borstal	Residential led	0.08	15
RWB23	Rochester West & Borstal	Non-residential	0.14	0
RWB25	Rochester West & Borstal	Residential led	0.59	132

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Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
RWB3	Rochester West & Borstal	Residential led	0.13	4
RWB4	Rochester West & Borstal	Residential led	0.30	9
RWB5	Rochester West & Borstal	Non-residential	1.62	0
RWB6	Rochester West & Borstal	Residential led	0.16	7
RWB8	Rochester West & Borstal	Residential led (mixed-use)	0.06	2
RWB9	Rochester West & Borstal	Residential led (mixed-use)	0.08	3
SMI1	St Marys Island	Residential led	0.51	100
SMI2	St Marys Island	Non-residential	0.65	0
SNF1	Strood North & Frindsbury	Residential led	16.13	360
SNF10	Strood North & Frindsbury	Residential led (mixed-use)	0.25	16
SNF12	Strood North & Frindsbury	Residential led	0.30	6
SNF13	Strood North & Frindsbury	Residential led (mixed-use)	3.32	373
SNF15	Strood North & Frindsbury	Residential led (mixed-use)	2.37	350
SNF16	Strood North & Frindsbury	Residential led (mixed-use)	0.06	20
SNF17	Strood North & Frindsbury	Residential led	0.02	6
SNF18	Strood North & Frindsbury	Residential led (mixed-use)	2.72	27
SNF19	Strood North & Frindsbury	Non-residential	0.65	0
SNF2	Strood North & Frindsbury	Residential led (mixed-use)	0.64	64
SNF20	Strood North & Frindsbury	Residential led	0.23	15
SNF21	Strood North & Frindsbury	Residential led (mixed-use)	0.64	44
SNF22	Strood North & Frindsbury	Residential led (mixed-use)	0.29	47
SNF23	Strood North & Frindsbury	Residential led (mixed-use)	0.06	8
SNF24	Strood North & Frindsbury	Residential led (mixed-use)	0.05	7
SNF25	Strood North & Frindsbury	Non-residential	2.83	0
SNF26	Strood North & Frindsbury	Non-residential	1.05	0
SNF27	Strood North & Frindsbury	Residential led	0.09	13
SNF28	Strood North & Frindsbury	Non-residential	0.28	0
SNF30	Strood North & Frindsbury	Residential led (mixed-use)	0.11	9
SNF31	Strood North & Frindsbury	Residential led (mixed-use)	0.03	8
SNF32	Strood North & Frindsbury	Residential led	0.03	6
SNF33	Strood North & Frindsbury	Non-residential	0.19	0
SNF34	Strood North & Frindsbury	Residential led (mixed-use)	0.17	52
SNF35	Strood North & Frindsbury	Residential led (mixed-use)	2.65	171
SNF36	Strood North & Frindsbury	Residential led (mixed-use)	0.03	6
SNF37	Strood North & Frindsbury	Residential led (mixed-use)	0.14	13
SNF38	Strood North & Frindsbury	Residential led	0.07	12
SNF39	Strood North & Frindsbury	Residential led	1.61	101
SNF41	Strood North & Frindsbury	Residential led (mixed-use)	4.97	216
SNF43	Strood North & Frindsbury	Residential led	3.75	123
SNF44	Strood North & Frinsbury	Residential led	0.07	6
SNF5	Strood North & Frindsbury	Residential led	0.35	8
SNF6	Strood North & Frindsbury	Residential led	0.07	7
SNF8	Strood North & Frindsbury	Residential led (mixed-use)	0.26	19
SNF9	Strood North & Frindsbury	Residential led (mixed-use)	0.45	40
SR1	Strood Rural	Residential led	1.78	12
SR10	Strood Rural	Residential led	0.25	10
SR13	Strood Rural	Residential led	0.47	10
SR14	Strood Rural	Residential led	5.15	49
SR15	Strood Rural	Residential led	1.65	41
SR16	Strood Rural	Residential led	4.97	150
SR18	Strood Rural	Residential led (mixed-use)	7.44	30
SR2	Strood Rural	Non-residential	38.42	0
SR21	Strood Rural	Residential led	1.79	20
SR22	Strood Rural	Residential led	0.55	6
SR24	Strood Rural	Residential led	1.67	10
SR25	Strood Rural	Residential led (mixed-use)	16.95	152
SR27	Strood Rural	Residential led	2.04	31
SR29	Strood Rural	Non-residential	0.16	0
SR3	Strood Rural	Residential led	0.60	5

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Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
SR30	Strood Rural	Residential led (mixed-use)	0.56	102
SR31	Strood Rural	Residential led (mixed-use)	1.39	311
SR32	Strood Rural	Residential led (mixed-use)	3.18	49
SR33	Strood Rural	Non-residential	0.21	0
SR34	Strood Rural	Residential led	0.34	50
SR35	Strood Rural	Non-residential	0.98	0
SR36	Strood Rural	Residential led (mixed-use)	2.25	300
SR37	Strood Rural	Residential led (mixed-use)	1.89	428
SR38	Strood Rural	Residential led (mixed-use)	1.32	150
SR39	Strood Rural	Residential led (mixed-use)	3.70	100
SR4	Strood Rural	Residential led	6.29	130
SR40	Strood Rural	Residential led (mixed-use)	0.87	200
SR41	Strood Rural	Residential led (mixed-use)	2.37	50
SR42	Strood Rural	Residential led	0.62	24
SR43	Strood Rural	Residential led	0.28	10
SR45	Strood Rural	Non-residential	0.49	0
SR46	Strood Rural	Residential led	0.24	10
SR47	Strood Rural	Residential led	0.13	9
SR48	Strood Rural	Residential led	0.25	8
SR49	Strood Rural	Residential led	0.24	6
SR5	Strood Rural	Residential led	4.22	120
SR50	Strood Rural	Residential led	0.27	5
SR51	Strood Rural	Residential led (mixed-use)	21.62	250
SR52	Strood Rural	Residential led (mixed-use)	31.53	355
SR6	Strood Rural	Residential led (mixed-use)	12.68	143
SR7	Strood Rural	Residential led	8.35	44
SR8	Strood Rural	Residential led	1.02	15
SW1	Strood West	Residential led	0.17	12
SW2	Strood West	Residential led	0.78	106
SW3	Strood West	Residential led	0.11	9
SW5	Strood West	Residential led	0.15	6
SW6	Strood West	Residential led	0.14	8
SW7	Strood West	Residential led	0.08	6
SW8	Strood West	Residential led	0.06	7
T1	Twydall	Non-residential	0.50	0
T2	Twydall	Residential led	0.25	7
T3	Twydall	Residential led	0.43	20
W1	Watling	Residential led	0.04	6
W11	Watling	Non-residential	1.81	0
W12	Watling	Residential led	0.70	44
W13	Watling	Non-residential	0.42	0
W14	Watling	Non-residential	0.08	0
W3	Watling	Residential led	0.31	12
W4	Watling	Residential led	0.03	5
W7	Watling	Residential led	0.39	21
W8	Watling	Residential led	0.32	7

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G.2 SA Objective 1: Climate change mitigation

G.2.1 Potential increase in carbon footprint

G.2.1.1 The estimated CO_2 emissions for Medway in 2022 was 753.9 kilo tonnes, with per capita emissions of 2.7 tonnes, according to UK local authority CO_2 emissions data[2]. It is likely that new development as a result of the MLP will result in an increase in local greenhouse gas (GHG) emissions due to the increase in population and the number of operating businesses.

G.2.1.2 The appraisal of reasonable alternatives sites is limited in its assessment of carbon emissions, due to an absence of site-specific carbon footprint data. Furthermore, the nature and scale of non-residential development is unknown at this stage. Consequently, the carbon emissions likely to be generated as a result of development is currently uncertain. Please see the methodology in **Appendix E** for further context.

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[2] Department for Energy Security and Net Zero (2024) UK local authority and regional carbon dioxide emissions national statistics: 2005-2022. Available at: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022 [Date accessed: 22/04/25]

G.3 SA Objective 2: Climate change adaptation

G.3.1 Fluvial flood zones

G.3.1.1 The MLP area is highly susceptible to fluvial and tidal flooding due to its coastal location at the confluence of the River Thames, the River Medway and the Swale. The River Medway runs from west to east through the centre of the Plan area. Flood Zones 2 and 3 are most prominent along Thames Estuary and the Medway Estuary, encompassing the north west and the east of the Hoo Peninsula. Smaller areas of flood risk branch off into urban areas in the south of the Plan area.

G.3.1.2 The majority of sites (249) are located wholly in Flood Zone 1. Development at these locations is expected to have a minor positive impact on flooding, as the proposed development at these sites is likely to locate site end users away from areas at risk of fluvial flooding.

G.3.1.3 Some 86 sites are largely or partially located within Flood Zone 2 and/or 3. Development within Flood Zone 3 has potential to result in a major negative impact on flooding in the area, with over a 1% chance or river flooding or over a 0.5% chance of sea flooding in any given year. Site end users at these sites could potentially be located in areas at high risk of fluvial flooding. A total of 77 sites include land within Flood Zone 3 (and many of these additionally include land within Flood Zone 2). This includes 18 sites where 100% of the site area lies in Flood Zone 3 (SNF38, SNF31, SNF28, SNF33, SNF22, SNF34, HHH21, SNF37, HHH32, CCB8, FP4, SNF24, SNF23, SMI1, SNF30, CCB23, SNF35, CCB27), and a further 35 sites where more than 50% of the site area lies within Flood Zone 3. The proposed development at these 77 sites could potentially locate site end users in areas at high risk of fluvial flooding.

G.3.1.4 Nine sites (CCB16, CCB20, CCB21, CCB22, CCB31, CHR8, RWB23, SR30 and SR33) are located wholly or partially within Flood Zone 2 (but do not include any land within Flood Zone 3). Development at these locations has potential to result in a minor negative impact on flooding in the area, with a 1% to 0.1% chance of river flooding and a 0.5% and 0.1% chance of sea flooding in any given year. The proposed development at these nine sites could potentially exacerbate existing issues of flooding in Medway, as development in these areas is likely to be subject to the impacts of flooding at some point in the future.

G.3.2 Surface water flood risk

G.3.2.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. Areas affected by surface water flooding can be found throughout Medway, in particular along roads, as well as within urban parkland, and associated with ponds and watercourses.

G.3.2.2 A total of 91 sites have been identified to coincide with an area of high SWFR, where the proposed development could potentially have a major negative impact on surface water flooding. Development at these sites will be likely to locate site end users in areas of high-risk surface water flooding as well as exacerbate SWFR in surrounding locations.

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G.3.2.3 Additionally, a further 118 sites coincide with areas of low SWFR, with 46 of these sites also coinciding with areas of medium SWFR. The proposed development at these 118 sites could potentially have a minor negative impact on surface water flooding in the area.

G.3.2.4 The remaining 126 sites which do not coincide with any significant areas of SWFR are identified to have a negligible impact on surface water flooding.

G.3.3 Flood defences

G.3.3.1 The Environment Agency has defined a number of flood defence schemes for the Thames, Medway and Swale Estuaries[3] [4]. Development coincident with these schemes, or within 20m of the toe of a proposed/existing flood defence, is considered unlikely to be able to safeguard the viability of future flood defences and has potential to result in a negative impact on climate change adaptation in the MLP area.

G.3.3.2 30 sites coincide with or lie within 20m of existing flood defence schemes and are therefore identified to result in a major negative impact on the viability of flood defences. The Strood Rural ward has the greatest impact on flood defences, with 10 sites within the Medway City Estate coinciding or being located within 20m of the existing River Medway flood defences.

G.3.3.3 The remaining 305 sites do not coincide or lie within 20m of flood defence schemes and are likely to have a negligible impact on flood defences.

Table G.3.1: *Sites impact matrix for SA Objective 2 – Climate change adaptation*

Site ref.	Site use	Flood Zones	SWFR	Flood defences
AS1	Residential led	+	-	0
AS10	Residential led	+	0	0
AS11	Residential led (Mixed-use)	+	0	0
AS14	Residential led	+	-	0
AS15	Residential led	--	-	0
AS16	Residential led (Mixed-use)	+	-	0
AS17	Residential led	--	-	0
AS18	Residential led	+	-	0
AS2	Residential led	+	-	0
AS20	Residential led (Mixed-use)	+	--	0
AS23	Residential led (park homes)	+	-	0
AS25	Residential led	+	0	0
AS28	Residential led	--	-	0
AS29	Residential led	+	-	0
AS3	Residential led	+	-	0
AS5	Residential led (Mixed-use)	+	-	0
AS6	Residential led (Mixed-use)	+	-	0
AS7	Non-residential	+	0	0

[3] Environment Agency (2023) Thames Estuary 2100 (TE2100). Available at: https://www.gov.uk/government/publications/thames-estuary-2100-te2100 [Date accessed: 25/04/25]

[4] Environment Agency (2024) Medway Estuary and Swale flood and coastal risk management strategy. Available at: https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy [Date accessed: 25/04/25]

Site ref.	Site use	Flood Zones	SWFR	Flood defences
AS8	Non-residential	+	-	0
AS9	Non-residential	--	--	0
CCB1	Residential led	+	-	0
CCB10	Residential led (Mixed-use)	+	-	0
CCB11	Residential led	+	0	0
CCB12	Residential led (Mixed-use)	+	0	0
CCB13	Residential led (Mixed-use)	--	--	0
CCB15	Residential led (Mixed-use)	+	0	0
CCB16	Residential led	-	0	0
CCB17	Residential led (Mixed-use)	--	--	0
CCB18	Residential led	+	0	0
CCB19	Residential led (Mixed-use)	+	0	0
CCB2	Residential led (Mixed-use)	+	0	0
CCB20	Residential led (Mixed-use)	-	0	0
CCB21	Residential led (Mixed-use)	-	0	0
CCB22	Residential led	-	-	0
CCB23	Residential led (Mixed-use)	--	-	0
CCB24	Residential led (Mixed-use)	--	-	0
CCB25	Residential-led	--	-	--
CCB26	Residential led (Mixed-use)	--	--	0
CCB27	Residential led (Mixed-use)	--	--	0
CCB28	Residential led	+	0	0
CCB29	Residential led	+	0	0
CCB3	Residential led (Mixed-use)	+	0	0
CCB30	Residential led (Mixed-use)	+	0	0
CCB31	Residential led	-	-	0
CCB33	Residential led	+	0	0
CCB34	Residential led (Mixed-use)	+	--	0
CCB35	Non-residential	--	-	0
CCB36	Residential led (Mixed-use)	+	-	0
CCB37	Residential led (Mixed-use)	+	-	0
CCB38	Residential led	+	--	0
CCB39	Residential led	+	-	0
CCB4	Residential led	+	0	0
CCB40	Residential led	+	0	0
CCB41	Residential led	+	-	0
CCB43	Residential led	--	--	0
CCB44	Residential led	+	0	0
CCB46	Residential led	+	0	0
CCB48	Residential led	+	0	0
CCB49	Residential led	+	-	0
CCB5	Non-residential	--	--	--
CCB6	Residential led (Mixed-use)	+	-	0
CCB7	Residential led (Mixed-use)	--	--	0
CCB8	Residential led	--	-	0
CCB9	Residential led	+	0	0
CHR1	Residential led	+	0	0
CHR10	Residential led	+	0	0
CHR11	Residential led	+	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
CHR13	Residential led (Gypsy and Traveller)	+	--	0
CHR14	Residential led (Mixed-use)	--	-	--
CHR15	Non-residential	+	--	0
CHR16	Non-residential	+	-	0
CHR17	Non-residential	+	0	0
CHR18	Non-residential	+	0	0
CHR19	Non-residential	+	--	0
CHR2	Non-residential	+	0	0
CHR20	Residential led	--	-	--
CHR21	Non-residential	--	--	0
CHR3	Non-residential	+	--	0
CHR5	Non-residential	+	0	0
CHR6	Residential led	+	--	0
CHR7	Residential led	+	0	0
CHR8	Non-residential	-	-	0
FH1	Non-residential	+	0	0
FP1	Residential led	+	-	0
FP10	Residential led	+	--	0
FP11	Residential led (Mixed-use)	--	--	--
FP12	Residential led	+	0	0
FP14	Residential led	+	0	0
FP16	Residential led (Mixed-use)	+	0	0
FP17	Residential led	+	0	0
FP18	Residential led	--	-	--
FP19	Residential led	+	--	0
FP2	Residential led	--	--	0
FP22	Residential led	+	0	0
FP23	Residential led	--	--	0
FP25	Residential led (Mixed-use)	+	--	0
FP4	Residential led	--	-	0
FP5	Residential led	--	0	--
FP6	Residential led	+	-	0
FP7	Residential led	--	-	--
FP8	Residential led	+	-	0
FP9	Residential led	--	-	--
GN10	Residential led	+	0	0
GN11	Residential led	+	-	0
GN13	Residential led	--	0	--
GN14	Residential led	--	--	0
GN15	Residential led (Mixed-use)	--	--	--
GN3	Residential led	--	-	0
GN4	Residential led	--	--	0
GN5	Residential led	+	-	0
GN6	Residential led (Mixed-use)	--	-	--
GN8	Residential led	+	0	0
GS1	Residential led	+	-	0
GS10	Residential led (Mixed-use)	+	0	0
GS11	Residential led	+	-	0
GS12	Residential led (Mixed-use)	+	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
GS13	Residential led	+	0	0
GS14	Residential led (Mixed-use)	+	0	0
GS18	Residential led (Mixed-use)	+	-	0
GS19	Residential led	+	0	0
GS2	Residential led	+	0	0
GS20	Residential led	+	0	0
GS23	Residential led	+	0	0
GS24	Residential led	+	-	0
GS26	Residential led	+	0	0
GS27	Residential led (Mixed-use)	+	0	0
GS29	Residential led	+	-	0
GS30	Residential led	+	0	0
GS32	Residential led	+	0	0
GS33	Residential led	+	0	0
GS34	Residential led	+	0	0
GS35	Residential led	+	0	0
GS37	Residential led (Mixed-use)	+	--	0
GS4	Residential led	+	0	0
GS5	Residential led	+	0	0
GS6	Residential led	+	0	0
GS7	Residential led (Mixed-use)	+	0	0
GS8	Residential led (Mixed-use)	+	0	0
HHH1	Non-residential	+	-	0
HHH11	Residential led	+	-	0
HHH14	Residential led	+	-	0
HHH15	Residential led	+	0	0
HHH16	Non-residential	+	-	0
HHH17	Residential led	+	-	0
HHH18	Residential led (Mixed-use)	+	--	0
HHH19	Non-residential	+	--	0
HHH21	Non-residential	--	0	0
HHH23	Residential led (Mixed-use)	+	-	0
HHH24	Residential led	+	-	0
HHH25	Residential led	+	-	0
HHH28	Residential led (Mixed-use)	+	-	0
HHH29	Residential led (Mixed-use)	+	-	0
HHH30	Residential led (Mixed-use)	--	--	0
HHH32	Residential led	--	0	0
HHH33	Residential led	+	0	0
HHH37	Non-residential	--	-	0
HHH38	Non-residential	--	-	0
HHH39	Non-residential	+	-	0
HHH4	Residential led	+	0	0
HHH40	Residential led	+	0	0
HHH41	Residential led	+	0	0
HHH5	Residential led	+	0	0
HHH7	Residential led	+	-	0
HHH8	Residential led (Mixed-use)	+	--	0
HHH9	Residential led	+	--	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
HW11	Residential led	+	-	0
HW3	Residential and secondary school	+	-	0
HW5	Non-residential	+	--	0
HW6	Residential led	+	-	0
HW7	Residential or non-residential	+	-	0
HW8	Residential led	+	0	0
L11	Residential led	+	-	0
L12	Residential led	+	0	0
L2	Residential led	+	0	0
L3	Residential led	+	--	0
L7	Residential led	+	-	0
L9	Residential led	+	-	0
LW10	Residential led	+	--	0
LW2	Residential led	+	0	0
LW3	Residential led	+	0	0
LW4	Residential led	+	--	0
LW5	Residential led (C2 use)	+	0	0
LW7	Residential led	+	-	0
PP1	Residential led	+	-	0
REWW3	Residential led	+	--	0
RN1	Residential led	--	--	0
RN10	Residential led	+	-	0
RN11	Residential led	+	--	0
RN12	Non-residential	+	-	0
RN14	Residential led	+	0	0
RN16	Residential led	+	--	0
RN17	Residential led	+	--	0
RN18	Residential led	+	-	0
RN19	Residential led	+	0	0
RN2	Residential led (Mixed-use)	+	-	0
RN22	Residential led	+	-	0
RN23	Residential led	+	--	0
RN24	Residential led	+	0	0
RN25	Residential led	+	--	0
RN26	Residential led (Mixed-use)	--	0	--
RN27	Residential led	+	--	0
RN28	Residential led	+	--	0
RN29	Residential led	+	0	0
RN3	Residential led	+	0	0
RN30	Residential led	+	0	0
RN31	Residential led	+	0	0
RN32	Residential led	+	0	0
RN33	Non-residential	+	--	0
RN34	Residential led	+	-	0
RN4	Residential led (Mixed-use)	+	0	0
RN5	Residential led (Mixed-use)	+	--	0
RSE1	Non-residential	+	0	0
RSE11	Non-residential	+	--	0
RSE4	Residential led	+	--	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
RSE8	Residential led (Mixed-use)	+	0	0
RSE9	Residential led	+	--	0
RWB1	Residential led	+	0	--
RWB10	Non-residential	+	-	0
RWB11	Residential led	+	0	0
RWB12	Residential led	+	--	0
RWB14	Residential led	+	--	0
RWB15	Residential led	+	--	0
RWB17	Residential led	+	--	0
RWB18	Residential led	+	--	0
RWB19	Residential led (Mixed-use)	+	--	0
RWB2	Residential led	--	-	0
RWB20	Residential led	+	-	0
RWB21	Residential led	+	0	0
RWB23	Non-residential	-	--	0
RWB25	Residential led	--	-	--
RWB3	Residential led	+	-	0
RWB4	Residential led	+	0	0
RWB5	Non-residential	+	0	0
RWB6	Residential led	+	-	0
RWB8	Residential led (Mixed-use)	+	-	0
RWB9	Residential led (Mixed-use)	+	-	0
SMI1	Residential led	--	0	0
SMI2	Non-residential	--	0	0
SNF1	Residential led	+	--	0
SNF10	Residential led (Mixed-use)	+	-	0
SNF12	Residential led	+	--	0
SNF13	Residential led (Mixed-use)	--	--	0
SNF15	Residential led (Mixed-use)	--	--	0
SNF16	Residential led (Mixed-use)	+	0	0
SNF17	Residential led	+	0	0
SNF18	Residential led (Mixed-use)	--	--	--
SNF19	Non-residential	+	-	0
SNF2	Residential led (Mixed-use)	+	0	0
SNF20	Residential led	+	-	0
SNF21	Residential led (Mixed-use)	--	--	0
SNF22	Residential led (Mixed-use)	--	--	0
SNF23	Residential led (Mixed-use)	--	0	0
SNF24	Residential led (Mixed-use)	--	--	0
SNF25	Non-residential	--	--	--
SNF26	Non-residential	--	0	--
SNF27	Residential led	+	0	0
SNF28	Non-residential	--	--	0
SNF30	Residential led (Mixed-use)	--	--	0
SNF31	Residential led (Mixed-use)	--	-	0
SNF32	Residential led	--	--	0
SNF33	Non-residential	--	--	0
SNF34	Residential led (Mixed-use)	--	--	0
SNF35	Residential led (Mixed-use)	--	--	--

Site ref.	Site use	Flood Zones	SWFR	Flood defences
SNF36	Residential led (Mixed-use)	--	--	0
SNF37	Residential led (Mixed-use)	--	--	0
SNF38	Residential led	--	-	0
SNF39	Residential led	--	-	0
SNF41	Residential led (Mixed-use)	--	--	--
SNF43	Residential led	--	-	0
SNF44	Residential led	+	0	0
SNF5	Residential led	+	--	0
SNF6	Residential led	+	0	0
SNF8	Residential led (Mixed-use)	+	-	0
SNF9	Residential led (Mixed-use)	+	-	0
SR1	Residential led	+	0	0
SR10	Residential led	+	0	0
SR13	Residential led	+	0	0
SR14	Residential led	+	-	0
SR15	Residential led	+	--	0
SR16	Residential led	+	--	0
SR18	Residential led (Mixed-use)	+	--	0
SR2	Non-residential	+	-	0
SR21	Residential led	+	-	0
SR22	Residential led	+	0	0
SR24	Residential led	+	--	0
SR25	Residential led	+	-	0
SR27	Residential led	+	0	0
SR29	Non-residential	--	0	0
SR3	Residential led	+	--	0
SR30	Residential led (Mixed-use)	-	-	0
SR31	Residential led (Mixed-use)	--	-	--
SR32	Residential led (Mixed-use)	+	0	0
SR33	Non-residential	-	0	0
SR34	Residential led	--	0	0
SR35	Non-residential	--	0	--
SR36	Residential led (Mixed-use)	--	-	--
SR37	Residential led (Mixed-use)	--	--	--
SR38	Residential led (Mixed-use)	--	-	--
SR39	Residential led (Mixed-use)	--	0	--
SR4	Residential led	+	--	0
SR40	Residential led (Mixed-use)	+	--	--
SR41	Residential led (Mixed-use)	+	-	0
SR42	Residential led	+	0	0
SR43	Residential led	+	0	0
SR45	Non-residential	+	0	0
SR46	Residential led	+	0	0
SR47	Residential led	+	-	0
SR48	Residential led	--	0	--
SR49	Residential led	--	0	--
SR5	Residential led	+	-	0
SR50	Residential led	--	--	--
SR51	Residential led (Mixed-use)	+	-	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
SR52	Residential led (Mixed-use)	+	--	0
SR6	Residential led (Mixed-use)	+	-	0
SR7	Residential led	+	-	0
SR8	Residential led	+	-	0
SW1	Residential led	+	0	0
SW2	Residential led	+	-	0
SW3	Residential led	+	0	0
SW5	Residential led	+	0	0
SW6	Residential led	+	--	0
SW7	Residential led	+	0	0
SW8	Residential led	+	0	0
T1	Non-residential	+	-	0
T2	Residential led	+	-	0
T3	Residential led	+	-	0
W1	Residential led	+	-	0
W11	Non-residential	+	-	0
W12	Residential led	+	-	0
W13	Non-residential	+	--	0
W14	Non-residential	+	--	0
W3	Residential led	+	--	0
W4	Residential led	+	0	0
W7	Residential led	+	--	0
W8	Residential led	+	-	0

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G.4 SA Objective 3: Biodiversity and geodiversity

G.4.1 European sites

G.4.1.1 European sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). A 6km Zone of Influence (ZOI) has been applied to the Medway and Thames Estuary and Marshes SPA and Ramsar sites as informed by the emerging HRA[5]. A 7km buffer has been applied to the North Downs Woodland SAC on the basis of visitor survey work[6] carried out at Boxley Warren Local Nature Reserve (LNR). A 400m zone has also been applied to all European sites on the basis of urbanisation concerns.

G.4.1.2 Site SR2 almost entirely coincides with Thames Estuary and Marshes SPA and Ramsar site. An additional 26 sites are located within 400m of a European site. Development at these 27 sites could potentially result in a major negative impact on European sites, due to the likelihood of threats and pressures arising from the construction and occupation of new development in such close proximity to the designated sites. The wards with the most sites resulting in a major negative impact include All Saints, Hoo St Werburgh and High Halstow, and Rainham North.

G.4.1.3 The remaining 308 sites are located within one or more of the identified ZOIs, potentially resulting in a minor negative impact on a European site due factors such as air pollution and recreational pressures.

G.4.1.4 The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

G.4.2 Sites of Special Scientific Interest

G.4.2.1 There are seven Sites of Special Scientific Interest (SSSIs) located within Medway. Two reasonable alternative sites coincide with an SSSI (Site SR2 wholly coincides with 'South Thames Estuary and Marshes' SSSI, and a small proportion of Site HHH7 with 'Chattenden Woods and Lodge Hill' SSSI). 10 sites lie adjacent to an SSSI. A 400m ZOI has also been applied to Lodge Hill SSSI, given its particular sensitivity in terms of urbanisation impacts on the nightingale population[7], where an additional seven sites are located. Development at these 19 sites could potentially result in a major negative impact on SSSIs, due to the increased likelihood of direct impacts on the features for which the SSSIs are designated.

G.4.2.2 Natural England have developed Impact Risk Zones (IRZs) for each SSSI in the country, in order to allow for a rapid assessment of the potential risks posed by development proposals. The majority of the remaining sites (305) fall within an IRZ which may require

[5] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan: Regulation 19 HRA Report.

[6] Maidstone Borough Council (2012) Boxley Warren Local Nature Reserve Visitor Surveys. Main Results Tabulations by Location of Interview.

[7] Medway Core Strategy Examination in Public Matter 5: Lodge Hill. Available at: https://www.medway.gov.uk/downloads/download/325/medway_core_strategy_matter_5_lodge_hill [Date accessed: 11/03/24]

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consultation with Natural England, reflected in the assessments at this stage as a potential minor negative impact. This includes IRZs which indicate strategic solutions in place to address potential recreational impacts arising from new development.

G.4.2.3 The remaining 11 sites do not lie in proximity to any SSSIs or within an IRZ which indicates the proposed use as a threat to any SSSIs, and are therefore likely to result on a negligible impact on SSSIs.

G.4.3 National Nature Reserves

G.4.3.1 High Halstow National Nature Reserve (NNR) is located in the north of Medway, and North Kent Woods and Downs NNR overlaps partially with the southwest of Medway. Site CHR3 partially coincides with the North Kent Woods and Downs NNR, where development is likely to result in the direct loss and/or fragmentation of habitats within the NNR. A major negative impact is recorded.

G.4.3.2 A further 16 sites lie in close proximity to High Halstow NNR, whilst a further 12 sites lie in close proximity to the North Kent Woods and Downs NNR. These 28 sites are identified as having potential to lead to a minor negative impact due to increased pressures from development, potentially including increased recreational impacts and habitat fragmentation of supporting habitats around the NNRs owing to their greenfield nature.

G.4.3.3 The 307 remaining sites do not lie in close proximity to High Halstow NNR, and are therefore likely to result in a negligible impact on the NNR.

G.4.4 Ancient woodland

G.4.4.1 Medway is home to various areas of ancient woodland, including 'Great Chattenden Wood' and 'Red/Stonyfield Woods'. Three sites (LW4, PP1 and RWB6) largely or partially coincide with ancient woodland, resulting in a direct major negative impact from development, such as through habitat loss and fragmentation. 11 sites lie adjacent and an additional 29 are located in close proximity to ancient woodland, potentially having a minor negative impact in the form of direct or indirect impacts, including from pollution and recreational pressures. The Lordswood and Walderslade ward has multiple sites which coincide or lie adjacent/in close proximity to ancient woodland, including 'North Dane Wood' and 'Grove Wood'.

G.4.4.2 The remaining 292 sites are located away from areas of ancient woodland, and are therefore likely to potentially result in a negligible impact on this biodiversity asset.

G.4.5 Local Nature Reserves

G.4.5.1 There are eight Local Nature Reserves (LNR) in Medway including 'Darland Banks' and 'Rede Common', all located in the south of Medway. No sites coincide with an LNR, however two sites (RWB2 and W12) lie adjacent and 11 sites lie in close proximity to an LNR, resulting in a potential minor negative impact owing to the increased risk of development related threats and pressures on the LNRs. The largest of these is Site LW7 which lies 750m from 'South Wood' LNR, proposed for the development of 451 residential units.

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G.4.6 Local Wildlife Sites

G.4.6.1 A total of 27 Local Wildlife Sites (LWS), formerly known as Sites of Nature Conservation Interest (SNCI) are located within Medway, including 'Great Lines' and 'Luton Banks'. The majority are located in the south of the Plan area, besides 'Grain Pit' which is located on the Isle of Grain. Four sites (CCB29, CCB40, CHR14 and GS2) coincide with, and six sites (HW3, LW4, LW7, RN16, RN26 and W12) lie adjacent to, an LWS; the proposed development at these 10 sites could potentially lead to increased risk of development related threats and pressures on these LWSs and result in a minor negative impact on biodiversity.

G.4.6.2 None of the remaining sites coincide or lie adjacent to an LWS and have therefore scored negligible against the biodiversity objective; however, it is acknowledged that adverse effects such as from recreational impacts can arise at greater distances.

G.4.7 Marine Conservation Zones

G.4.7.1 The Medway Estuary Marine Conservation Zone (MCZ) protects the dynamic ecosystem surrounding the River Medway and its confluence with the River Thames and the Swale. Two sites (SR36 and SR38) coincide with, and 22 sites lie adjacent to, the MCZ and as such, the proposed development at these 24 sites has potential to result in a minor negative impact on the MCZ due to an increased risk of development pressures on marine habitats. This includes numerous sites in the Strood Rural ward, such as Sites SR36 and SR38 where the eastern edges of the sites coincide with the MCZ, with potential for direct adverse effects. Development within these sites could therefore have an adverse impact on habitats in and surrounding the River Medway.

G.4.8 Priority habitats

G.4.8.1 There are multiple priority habitats found throughout Medway. The most prominent of these include coastal and floodplain grazing marsh in the north of the Hoo Peninsula, mudflats surrounding the estuary and deciduous woodland scattered throughout Medway.

G.4.8.2 A total of 30 sites coincide wholly or partially with priority habitats, including a large proportion which coincide with deciduous woodland. This includes Sites CHR10 where 99% of the site area coincides with traditional orchard and Site HHH37 where 98% of the site area coincides with coastal and floodplain grazing marsh. The proposed development at these 30 sites is likely to have a minor negative impact on priority habitats in Medway due to the potential loss or degradation of these habitats.

G.4.8.3 On the other hand, the remaining 305 sites do not coincide with any identified priority habitat; therefore, the proposed development at these sites would be likely to have a negligible impact on the overall presence of priority habitats.

G.4.9 Regionally Important Geological and Geomorphological Sites

G.4.9.1 There are four Regionally Important Geological and Geomorphological Sites (RIGGS) in Medway which include a range of notable geological features and formations. These include 'Halling Chalk Pit', 'Bores Hole' and 'Francis Chalk Quarry', which are found in the west of Medway, and 'Fort Amherst' which is located centrally in the urban area. The

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proposed development at all reasonable alternative sites is likely to have a negligible impact on geological sites as they do not coincide with any RIGGS.

G.4.10 Open Mosaic Habitats

G.4.10.1 Open mosaic habitats (OMH) indicate areas of previously developed or brownfield land that have potential to support diverse habitats. There are 91 OMHs scattered throughout Medway, predominantly located in more rural areas. Some 18 sites partially or largely coincide with OMHs, including four in the Hoo St Werburgh ward. The proposed developments in these locations could potentially result in direct adverse impacts on OMHs and the biodiversity value they provide in Medway, with a minor negative impact identified.

G.4.10.2 The remaining 317 sites do not coincide with OMHs and are therefore likely to result in a negligible impact on OMHs.

Table G.4.1: *Sites impact matrix for SA Objective 3 – Biodiversity and geodiversity*

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
AS1	Residential led	-	-	-	-	0	0	0	0	0	0
AS10	Residential led	-	-	0	0	0	0	0	0	0	0
AS11	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
AS14	Residential led	-	-	0	0	0	0	0	0	0	0
AS15	Residential led	--	-	0	0	0	0	0	0	0	0
AS16	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
AS17	Residential led	--	-	0	0	0	0	0	0	0	0
AS18	Residential led	-	-	0	0	0	0	0	0	0	0
AS2	Residential led	-	-	-	-	0	0	0	0	0	0
AS20	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
AS23	Residential led (park homes)	--	-	0	0	0	0	0	0	0	0
AS25	Residential led	-	-	0	0	0	0	0	0	0	0
AS28	Residential led	--	--	0	0	0	0	0	0	0	0
AS29	Residential led	-	-	0	0	0	0	0	0	0	0
AS3	Residential led	-	-	-	-	0	0	0	0	0	0
AS5	Residential led (mixed-use)	-	-	-	-	0	0	0	0	0	0
AS6	Residential led (mixed-use)	-	-	-	-	0	0	0	0	0	0
AS7	Non-residential	-	-	-	-	0	0	0	0	0	0
AS8	Non-residential	-	-	0	-	0	0	0	0	0	0
AS9	Non-residential	-	-	0	-	0	0	0	0	0	0
CCB1	Residential led	-	-	0	0	0	0	0	0	0	0
CCB10	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB11	Residential led	-	-	0	0	0	0	0	0	0	0
CCB12	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB13	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB15	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB16	Residential led	-	-	0	0	0	0	0	0	0	0
CCB17	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB18	Residential led	-	-	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
CCB19	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB2	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB20	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB21	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB22	Residential led	-	-	0	0	0	0	0	0	0	0
CCB23	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB24	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB25	Residential led	-	-	0	0	0	0	-	0	0	-
CCB26	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB27	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB28	Residential led	-	-	0	0	0	0	0	0	0	0
CCB29	Residential led	-	-	0	0	0	-	0	-	0	0
CCB3	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB30	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB31	Residential led	-	-	0	0	0	0	0	0	0	0
CCB33	Residential led	-	-	0	0	0	0	0	0	0	0
CCB34	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB35	Non-residential	-	-	0	0	0	0	0	-	0	-
CCB36	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB37	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB38	Residential led	-	-	0	0	0	0	0	0	0	0
CCB39	Residential led	-	-	0	0	0	0	0	0	0	0
CCB4	Residential led	-	-	0	0	0	0	0	0	0	0
CCB40	Residential led	-	-	0	0	0	-	0	0	0	0
CCB41	Residential led	-	-	0	0	0	0	0	0	0	0
CCB43	Residential led	-	-	0	0	0	0	0	0	0	0
CCB44	Residential led	-	-	0	0	0	0	0	0	0	0
CCB46	Residential led	-	-	0	0	0	0	0	0	0	0
CCB48	Residential led	-	-	0	0	0	0	0	0	0	0
CCB49	Residential led	-	-	0	0	0	0	0	0	0	0
CCB5	Non-residential	-	-	0	0	0	0	-	0	0	0
CCB6	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB7	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
CCB8	Residential led	-	-	0	0	0	0	0	0	0	0
CCB9	Residential led	-	-	0	0	0	0	0	0	0	0
CHR1	Residential led	-	0	-	-	0	0	0	0	0	0
CHR10	Residential led	-	0	-	-	0	0	0	-	0	0
CHR11	Residential led	-	0	-	0	0	0	0	0	0	0
CHR13	Residential led (Gypsy and Traveller)	-	-	-	-	0	0	0	0	0	-
CHR14	Residential led (mixed-use)	-	0	-	0	0	-	-	-	0	-
CHR15	Non-residential	-	-	0	0	0	0	0	0	0	0
CHR16	Non-residential	-	-	-	0	0	0	0	-	0	0
CHR17	Non-residential	-	-	-	0	0	0	0	-	0	-
CHR18	Non-residential	-	-	0	0	0	0	0	0	0	-
CHR19	Non-residential	-	-	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
CHR2	Non-residential	-	--	-	-	0	0	0	0	0	0
CHR20	Residential led	-	-	0	0	0	0	0	0	0	0
CHR21	Non-residential	-	-	0	0	0	0	0	0	0	0
CHR3	Non-residential	-	--	--	-	0	0	0	-	0	0
CHR5	Non-residential	-	0	-	0	0	0	0	-	0	0
CHR6	Residential led	-	0	-	0	0	0	0	0	0	0
CHR7	Residential led	-	0	-	-	0	0	0	-	0	0
CHR8	Non-residential	-	0	-	0	0	0	0	0	0	0
FH1	Non-residential	-	-	0	0	0	0	0	-	0	0
FP1	Residential led	-	-	0	0	0	0	0	0	0	0
FP10	Residential led	-	-	0	0	0	0	0	0	0	0
FP11	Residential led (mixed-use)	-	-	0	0	0	0	-	0	0	0
FP12	Residential led	-	-	0	0	0	0	0	0	0	0
FP14	Residential led	-	-	0	0	0	0	0	0	0	0
FP16	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
FP17	Residential led	-	-	0	0	0	0	0	0	0	0
FP18	Residential led	-	-	0	0	0	0	0	0	0	0
FP19	Residential led	-	-	0	0	0	0	0	0	0	0
FP2	Residential led	-	-	0	0	0	0	0	0	0	0
FP22	Residential led	-	-	0	0	0	0	0	0	0	0
FP23	Residential led	-	-	0	0	0	0	0	0	0	0
FP25	Residential led (mixed-use)	-	-	0	0	0	0	0	-	0	0
FP4	Residential led	-	-	0	0	0	0	0	0	0	0
FP5	Residential led	-	-	0	0	0	0	-	0	0	0
FP6	Residential led	-	-	0	0	0	0	0	0	0	0
FP7	Residential led	-	-	0	0	0	0	0	0	0	0
FP8	Residential led	-	-	0	0	0	0	0	0	0	0
FP9	Residential led	-	-	0	0	0	0	-	0	0	0
GN10	Residential led	--	-	0	0	0	0	0	0	0	0
GN11	Residential led	-	-	0	0	0	0	0	0	0	0
GN13	Residential led	--	--	0	0	0	0	-	0	0	0
GN14	Residential led	-	-	0	0	0	0	0	0	0	0
GN15	Residential led (mixed-use)	--	--	0	0	0	0	-	0	0	0
GN3	Residential led	-	-	0	0	0	0	0	0	0	0
GN4	Residential led	-	-	0	0	0	0	0	0	0	0
GN5	Residential led	-	-	0	0	0	0	0	0	0	0
GN6	Residential led (mixed-use)	--	--	0	0	0	0	-	0	0	0
GN8	Residential led	-	-	0	0	0	0	0	0	0	0
GS1	Residential led	-	-	0	0	0	0	0	0	0	0
GS10	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
GS11	Residential led	-	-	0	0	0	0	0	0	0	0
GS12	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
GS13	Residential led	-	-	0	0	0	0	0	0	0	0
GS14	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
GS18	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
GS19	Residential led	-	-	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
GS2	Residential led	-	-	0	0	0	-	0	0	0	0
GS20	Residential led	-	-	0	0	0	0	0	0	0	0
GS23	Residential led	-	-	0	0	0	0	0	0	0	0
GS24	Residential led	-	-	0	0	0	0	0	0	0	0
GS26	Residential led	-	-	0	0	0	0	0	0	0	0
GS27	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
GS29	Residential led	-	-	0	0	0	0	0	0	0	0
GS30	Residential led	-	-	0	0	0	0	0	0	0	0
GS32	Residential led	-	-	0	0	0	0	0	0	0	0
GS33	Residential led	-	-	0	0	0	0	0	0	0	0
GS34	Residential led	-	-	0	0	0	0	0	0	0	0
GS35	Residential led	-	-	0	0	0	0	0	0	0	0
GS37	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
GS4	Residential led	-	-	0	0	0	0	0	0	0	0
GS5	Residential led	-	-	0	0	0	0	0	0	0	0
GS6	Residential led	-	-	0	0	0	0	0	0	0	0
GS7	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
GS8	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
HHH1	Non-residential	-	-	0	-	0	0	0	0	0	-
HHH11	Residential led	-	-	0	0	0	0	0	0	0	0
HHH14	Residential led	-	-	0	-	0	0	0	0	0	0
HHH15	Residential led	-	-	-	0	0	0	0	0	0	0
HHH16	Non-residential	-	-	-	-	0	0	0	0	0	0
HHH17	Residential led	-	-	-	-	0	0	0	0	0	0
HHH18	Residential led (mixed-use)	-	-	-	-	0	0	0	0	0	0
HHH19	Non-residential	-	-	-	-	0	0	0	0	0	0
HHH21	Non-residential	--	-	0	0	0	0	0	0	0	0
HHH23	Residential led (mixed-use)	-	-	-	0	0	0	0	0	0	0
HHH24	Residential led	-	-	0	0	0	0	0	0	0	0
HHH25	Residential led	-	-	0	0	0	0	0	-	0	0
HHH28	Residential led (mixed-use)	-	-	-	0	0	0	0	0	0	0
HHH29	Residential led (mixed-use)	-	-	-	-	0	0	0	0	0	0
HHH30	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
HHH32	Residential led	--	-	0	0	0	0	0	0	0	0
HHH33	Residential led	-	-	0	0	0	0	0	0	0	0
HHH37	Non-residential	-	-	0	0	0	0	0	-	0	-
HHH38	Non-residential	--	-	0	0	0	0	0	-	0	-
HHH39	Non-residential	--	-	0	0	0	0	0	0	0	-
HHH4	Residential led	-	-	0	0	0	0	0	0	0	0
HHH40	Residential led	-	-	0	-	0	0	0	0	0	0
HHH41	Residential led	-	-	0	0	0	0	0	0	0	0
HHH5	Residential led	-	-	0	-	0	0	0	0	0	0
HHH7	Residential led	-	--	-	-	0	0	0	-	0	0
HHH8	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
HHH9	Residential led	-	-	0	0	0	0	0	0	0	0
HW11	Residential led	-	-	0	-	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
HW3	Residential and secondary school	-	-	0	-	-	-	0	-	0	0
HW5	Non-residential	-	-	0	-	0	0	0	0	0	0
HW6	Residential led	-	-	0	-	0	0	0	0	0	0
HW7	Residential or non-residential	-	-	0	-	0	0	0	0	0	0
HW8	Residential led	-	-	0	0	0	0	0	0	0	0
L11	Residential led	-	-	0	0	0	0	0	0	0	0
L12	Residential led	-	-	0	0	0	0	0	0	0	0
L2	Residential led	-	-	0	0	0	0	0	0	0	0
L3	Residential led	-	-	0	0	0	0	0	0	0	0
L7	Residential led	-	-	0	0	0	0	0	0	0	0
L9	Residential led	-	-	0	0	0	0	0	0	0	0
LW10	Residential led	-	-	0	-	-	0	0	0	0	0
LW2	Residential led	-	0	0	-	0	0	0	0	0	0
LW3	Residential led	-	0	0	0	0	0	0	0	0	0
LW4	Residential led	-	-	0	--	-	-	0	-	0	0
LW5	Residential led (C2 use)	-	-	0	0	0	0	0	0	0	0
LW7	Residential led	-	-	0	-	-	-	0	0	0	0
PP1	Residential led	-	-	0	--	0	0	0	-	0	0
REWW 3	Residential led	-	-	0	0	0	0	0	0	0	0
RN1	Residential led	--	-	0	0	0	0	0	0	0	0
RN10	Residential led	--	-	0	0	0	0	0	0	0	0
RN11	Residential led	-	-	0	0	0	0	0	0	0	0
RN12	Non-residential	-	-	0	0	0	0	0	0	0	0
RN14	Residential led	--	-	0	0	0	0	0	-	0	0
RN16	Residential led	-	-	0	0	-	-	0	0	0	0
RN17	Residential led	-	-	0	0	-	0	0	-	0	0
RN18	Residential led	-	-	0	0	0	0	0	0	0	0
RN19	Residential led	-	-	0	0	-	0	0	0	0	0
RN2	Residential led (mixed-use)	-	-	0	0	0	0	0	-	0	0
RN22	Residential led	-	-	0	0	-	0	0	0	0	0
RN23	Residential led	--	-	0	0	-	0	0	0	0	0
RN24	Residential led	-	-	0	0	0	0	0	0	0	0
RN25	Residential led	--	-	0	0	-	0	0	0	0	0
RN26	Residential led (mixed-use)	--	-	0	0	0	-	-	0	0	0
RN27	Residential led	--	-	0	0	0	0	0	0	0	-
RN28	Residential led	-	-	0	0	0	0	0	0	0	0
RN29	Residential led	-	-	0	0	0	0	0	0	0	0
RN3	Residential led	-	-	0	0	0	0	0	0	0	0
RN30	Residential led	-	-	0	0	0	0	0	0	0	0
RN31	Residential led	-	-	0	0	0	0	0	0	0	-
RN32	Residential led	-	-	0	0	0	0	0	0	0	0
RN33	Non-residential	-	-	0	0	0	0	0	0	0	-
RN34	Residential led	--	-	0	0	0	0	0	0	0	0
RN4	Residential led (mixed-use)	--	-	0	0	0	0	0	-	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
RN5	Residential led (mixed-use)	--	-	0	0	0	0	0	-	0	-
RSE1	Non-residential (road spur and open space)	-	-	0	-	0	0	0	-	0	0
RSE11	Non-residential	-	-	0	0	0	0	0	0	0	0
RSE4	Residential led	-	-	0	-	0	0	0	0	0	0
RSE8	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
RSE9	Residential led	-	-	0	0	0	0	0	0	0	0
RWB1	Residential led	-	0	0	0	0	0	-	0	0	0
RWB10	Non-residential	-	-	0	0	0	0	0	0	0	0
RWB11	Residential led	-	-	0	0	0	0	0	0	0	0
RWB12	Residential led	-	-	0	0	0	0	0	0	0	0
RWB14	Residential led	-	-	0	0	0	0	0	0	0	0
RWB15	Residential led	-	-	0	0	0	0	0	0	0	0
RWB17	Residential led	-	-	0	0	0	0	0	0	0	0
RWB18	Residential led	-	-	0	0	0	0	0	0	0	0
RWB19	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
RWB2	Residential led	-	-	0	0	-	0	-	0	0	0
RWB20	Residential led	-	-	0	0	0	0	0	0	0	0
RWB21	Residential led	-	-	0	0	0	0	0	0	0	0
RWB23	Non-residential	-	-	0	0	0	0	0	0	0	0
RWB25	Residential led	-	-	0	0	0	0	-	0	0	0
RWB3	Residential led	-	-	0	0	0	0	0	0	0	0
RWB4	Residential led	-	-	0	0	0	0	0	0	0	0
RWB5	Non-residential	-	-	0	0	0	0	0	0	0	0
RWB6	Residential led	-	-	0	--	0	0	0	0	0	0
RWB8	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
RWB9	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SMI1	Residential led	-	-	0	0	0	0	0	0	0	0
SMI2	Non-residential	-	-	0	0	0	0	0	0	0	0
SNF1	Residential led	-	-	0	0	-	0	0	0	0	0
SNF10	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF12	Residential led	-	-	0	0	0	0	0	0	0	0
SNF13	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF15	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF16	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF17	Residential led	-	-	0	0	0	0	0	0	0	0
SNF18	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF19	Non-residential	-	-	0	0	0	0	0	0	0	0
SNF2	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF20	Residential led	-	-	0	0	0	0	0	0	0	0
SNF21	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF22	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF23	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF24	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF25	Non-residential	-	-	0	0	0	0	0	0	0	0
SNF26	Non-residential	-	-	0	0	0	0	-	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
SNF27	Residential led	-	-	0	0	0	0	0	0	0	0
SNF28	Non-residential	-	-	0	0	0	0	0	0	0	0
SNF30	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF31	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF32	Residential led	-	-	0	0	0	0	0	0	0	0
SNF33	Non-residential	-	-	0	0	0	0	0	0	0	0
SNF34	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF35	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF36	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF37	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF38	Residential led	-	-	0	0	0	0	0	0	0	0
SNF39	Residential led	-	-	0	0	0	0	0	0	0	0
SNF41	Residential led (mixed-use)	-	-	0	0	0	0	-	0	0	0
SNF43	Residential led	-	-	0	0	0	0	0	0	0	-
SNF44	Residential led	-	-	0	0	0	0	0	0	0	0
SNF5	Residential led	-	-	0	0	0	0	0	0	0	0
SNF6	Residential led	-	-	0	0	0	0	0	0	0	0
SNF8	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SNF9	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SR1	Residential led	-	-	0	0	0	0	0	0	0	0
SR10	Residential led	-	-	0	0	0	0	0	0	0	0
SR13	Residential led	-	-	0	0	0	0	0	0	0	0
SR14	Residential led	-	-	0	-	0	0	0	0	0	0
SR15	Residential led	-	-	0	0	0	0	0	0	0	0
SR16	Residential led	-	-	0	0	0	0	0	0	0	0
SR18	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SR2	Non-residential	--	--	0	0	0	0	0	-	0	-
SR21	Residential led	-	-	0	0	0	0	0	0	0	0
SR22	Residential led	-	-	0	0	0	0	0	0	0	0
SR24	Residential led	-	-	0	-	0	0	0	0	0	0
SR25	Residential led (mixed-use)	-	-	0	0	0	0	0	-	0	-
SR27	Residential led	-	-	0	0	0	0	0	0	0	0
SR29	Non-residential	-	-	0	0	0	0	0	0	0	0
SR3	Residential led	-	-	0	0	0	0	0	0	0	0
SR30	Residential led (mixed-use)	-	-	0	0	0	0	0	0	0	0
SR31	Residential led (mixed-use)	-	-	0	0	0	0	-	0	0	0
SR32	Residential led (mixed-use)	-	--	0	0	0	0	0	0	0	0
SR33	Non-residential	-	-	0	0	0	0	0	0	0	0
SR34	Residential led	-	-	0	0	0	0	0	0	0	0
SR35	Non-residential	-	-	0	0	0	0	0	0	0	0
SR36	Residential led (mixed-use)	-	-	0	0	0	0	-	0	0	0
SR37	Residential led (mixed-use)	-	-	0	0	0	0	-	0	0	0
SR38	Residential led (mixed-use)	-	-	0	0	0	0	-	0	0	0
SR39	Residential led (mixed-use)	-	-	0	0	0	0	-	-	0	0
SR4	Residential led	-	-	0	0	0	0	0	0	0	0
SR40	Residential led (mixed-use)	-	-	0	0	0	0	-	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
SR41	Residential led (mixed-use)	-	-	0	-	0	0	0	0	0	0
SR42	Residential led	-	-	0	0	0	0	0	0	0	0
SR43	Residential led	--	-	0	0	0	0	0	0	0	0
SR45	Non-residential	--	-	0	0	0	0	0	0	0	0
SR46	Residential led	--	-	-	0	0	0	0	0	0	0
SR47	Residential led	-	-	0	0	0	0	0	0	0	0
SR48	Residential led	-	-	0	0	0	0	-	0	0	0
SR49	Residential led	-	-	0	0	0	0	-	0	0	0
SR5	Residential led	-	-	0	0	0	0	0	-	0	0
SR50	Residential led	-	--	0	-	0	0	-	-	0	0
SR51	Residential led (mixed-use)	-	--	0	0	0	0	0	0	0	0
SR52	Residential led (mixed-use)	-	-	0	-	0	0	0	0	0	0
SR6	Residential led (mixed-use)	--	--	0	0	0	0	0	0	0	0
SR7	Residential led	-	-	0	0	0	0	0	0	0	0
SR8	Residential led	-	-	0	0	0	0	0	0	0	-
SW1	Residential led	-	-	0	0	0	0	0	0	0	0
SW2	Residential led	-	-	0	0	0	0	0	0	0	0
SW3	Residential led	-	-	0	0	0	0	0	0	0	0
SW5	Residential led	-	-	0	0	0	0	0	0	0	0
SW6	Residential led	-	-	0	0	0	0	0	0	0	0
SW7	Residential led	-	-	0	0	0	0	0	0	0	0
SW8	Residential led	-	-	0	0	0	0	0	0	0	0
T1	Non-residential	-	-	0	0	0	0	0	-	0	0
T2	Residential led	-	-	0	0	0	0	0	0	0	0
T3	Residential led	-	-	0	0	0	0	0	0	0	0
W1	Residential led	-	-	0	0	0	0	0	0	0	0
W11	Non-residential	-	-	0	0	0	0	0	0	0	0
W12	Residential led	-	-	0	-	-	-	0	0	0	0
W13	Non-residential	-	-	0	0	0	0	0	0	0	0
W14	Non-residential	-	-	0	0	0	0	0	0	0	0
W3	Residential led	-	-	0	0	0	0	0	0	0	0
W4	Residential led	-	-	0	0	0	0	0	0	0	0
W7	Residential led	-	-	0	0	0	0	0	0	0	0
W8	Residential led	-	-	0	0	0	0	0	0	0	0

G.5 SA Objective 4: Landscape and townscape

G.5.1 Kent Downs AONB/National Landscape

G.5.1.1 A small proportion of the Kent Downs National Landscape (formerly known as Area of Outstanding Natural Beauty (AONB)) lies within the south west and south east of the MLP area. Six reasonable alternative sites are located wholly within the National Landscape (CHR1, CHR2, CHR3, CHR10, RSE1 and RSE4). This includes sites within the parcels '1A: West Kent Downs', '1B: Mid Kent Downs' and '4B: Medway Valley' of the Kent Downs Landscape Character Assessment[8], where a number of sensitivities and potential landscape impacts associated with new development have been identified. One site (CHR7) lies adjacent to the National Landscape. The proposed development at these seven sites is identified to have a major negative impact on the National Landscape due to their potential for direct impacts on the special qualities and character of the designated landscape.

G.5.1.2 An additional 31 sites are identified as being in close proximity to the National Landscape, with potential to result in a minor negative impact on views or the setting of the designated landscape. The majority of these negative impacts were identified within the Cuxton, Halling and Riverside ward, which have potential to impact the long reaching views from the Eastern Scarp and Western Scarp of the Medway Valley[9].

G.5.2 Country Park

G.5.2.1 Medway's Country Parks include 'Ranscombe Farm', 'Capstone Farm' and 'Riverside'. No sites coincide with any country parks. Some 23 sites are located in close proximity to a country park, with potential to result in a minor negative impact on the setting and/or views experienced from the country park. Sites which are located at a greater distance from a country park, or are already in an urbanised area, are not expected to result in any significant adverse impacts and have therefore scored negligible.

G.5.3 Landscape Character Assessment

G.5.3.1 The Medway Landscape Character Assessment (LCA)[10] has identified 34 landscape character areas within Medway located in the rural area or urban-rural fringe. The largest of these include the 'Hoo Peninsula', 'Cliffe to St Mary's Marshes' and 'Allhallows to Stoke Marshes'. Landscape character areas have been evaluated within the LCA for their key features, condition and sensitivities.

[8] Fiona Fyfe Associates (2023) Kent Downs AONB Landscape Character Assessment Update 2020. Revised and Published 2023. Available at: https://kentdowns.org.uk/landscape-character-assessment-2020/ [Date accessed: 05/06/25]

[9] Fiona Fyfe Associates (2023) Kent Downs AONB Landscape Character Assessment Update 2020. Medway Valley, Landscape Character Area 4B. Available at: https://kentdowns.org.uk/wp-content/uploads/2023/01/10.0-LCA-4B_Medway-Valley_FINAL.pdf [Date accessed: 25/04/25]

[10] LUC (2024) Medway Landscape Character Assessment. Final Report, June 2024. Available at: https://medway.oc2.uk/docfiles/20/Landscape%20Character%20Assessment.pdf [Date accessed: 13/03/25]

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G.5.3.2 Some 111 sites lie within the LCA area. The proposed development at 73 of these sites are identified to have potential to alter or discord with the descriptions of the relevant character area as published in the LCA, and have therefore been identified to have a minor negative impact on the landscape character. This includes a number of sites within the 'Hoo Peninsula' character area where there is potential for loss of rural character, sites within 'Chattenden Ridge' character area where there is potential for development to diminish the green buffer and arable fields between Lodge Hill and Hoo St Werburgh, and sites within 'Lower Rainham' where the green backdrop to the marshes could be lost.

G.5.3.3 Some 38 sites are located within the LCA study area, but the proposed development is unlikely to significantly affect the characteristics of the local landscape. This includes smaller sites, such as those which would be in line with the existing settlement pattern, and previously developed sites, where there is likely to be an overall negligible effect on the characteristics as described in the LCA.

G.5.3.4 The 224 sites which are not located within the assessment area, and as such lie within the existing urban area of Medway, are unlikely to lead to a significant change to the landscape character and have therefore scored negligible for the purpose of this assessment.

G.5.4 Landscape Sensitivity

G.5.4.1 The draft Hoo Landscape Sensitivity and Capacity study (February 2019)[11] has identified ten land parcels within the Hoo Peninsula which have been assessed for their sensitivity, value and capacity. The land parcels have been categorised based on their sensitivity to change as a result of future development, which the reasonable alternative site proposals have been assessed against. 299 sites lie outside of the Landscape Sensitivity Assessment study area. The potential effect of each of these sites on sensitive landscapes has therefore been scored as uncertain.

G.5.4.2 All of the sites assessed for landscape sensitivity (36) are within the All Saints, Hoo St Werburgh and High Halstow or Strood Rural wards. 10 sites are located wholly or partially in areas of 'high' sensitivity, and were therefore identified as being likely to have a major negative impact on the landscape for the purposes of the SA. An additional 18 sites are wholly or partially located in areas of 'medium' sensitivity, with potential to lead to a minor negative impact on the landscape. The remaining assessed sites are all in areas of 'low' sensitivity, and therefore have been identified as leading to a negligible impact on sensitive landscapes.

G.5.5 Landscape Capacity

G.5.5.1 The draft Hoo Landscape Sensitivity and Capacity study (February 2019)[12] has identified ten land parcels within the Hoo Peninsula which have been assessed for their sensitivity, value and capacity. The land parcels have been categorised based on their susceptibility to change as a result of future development, which the reasonable alternative site proposals have been assessed against. Some 299 sites lie outside of the Landscape

[11] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 25/04/25}

[12] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 25/04/25}

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Capacity Assessment study area. The potential effect of each of these sites on landscape capacity has therefore been scored as uncertain.

G.5.5.2 All of the sites assessed for landscape capacity (36) are part of the All Saints, Hoo St Werburgh and High Halstow or Strood Rural wards. 10 sites are located wholly or partially in areas assessed as 'high' or 'medium-high'. For the purposes of the SA, these sites are identified as being likely to have a major negative impact on the landscape due to their lack of ability to accommodate change. An additional 18 sites are wholly or partially located in areas assessed as 'medium', with a potential minor negative impact on the landscape. The remaining assessed sites were all in areas of assessed as 'low-medium' where there is more capacity for change, and therefore these sites are scored as negligible.

G.5.6 Views from the PRoW network and National Trails

G.5.6.1 The Public Rights of Way (PRoW) network in Medway is mostly interconnected in rural areas in the north and south west, however becomes more fragmented in the urban areas. The North Downs Way National Trail passes through the south west of Medway. The proposed development at 108 reasonable alternative sites could potentially alter the views of open space currently experienced by users of the PRoW network, and result in a minor negative impact on the landscape. For instance, Site CHR14 has approximately 955m of PRoW running adjacent to the site boundary, and is therefore the proposed development at this site is likely to impact the views experienced by users, particularly of the River Medway that additionally runs adjacent to the site.

G.5.6.2 Sites which contain existing development, or are separated from PRoWs by existing built form, would be unlikely to significantly alter views and are assessed as negligible.

G.5.7 Views experienced by local residents

G.5.7.1 The development proposed at a large proportion of reasonable alternative sites is considered to have to potential to alter the views currently experienced by local residents, primarily due to their location with respect to existing residential zones. A minor negative impact on the local landscape could therefore be expected at these 129 sites. The remaining sites comprise previously developed land and/or are located away from existing residential zones; therefore, the proposed development at these sites would be unlikely to result in a significant impact on views.

G.5.8 Coalescence and urbanisation of the countryside

G.5.8.1 The risks of coalescence and urbanisation of the countryside are key considerations for development proposals within Medway. The north and south west of Medway is predominantly rural which creates a greater susceptibility for the joining of settlements or urban sprawl. The proposed development at 23 sites were determined to reduce the separation between settlements and therefore increase the risk of coalescence and loss of identity of these settlements.

G.5.8.2 The proposed development at 49 sites were assessed as having potential to increase the risk of encroachment/urban sprawl, owing to their location extending outside of the current built form.

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G.5.8.3 In more rural wards such as Hoo St Werburgh and High Halstow, the majority of sites were identified as having potential adverse effects for coalescence and/or urbanisation of the countryside. A minor negative impact has been identified against this objective for these sites.

Table G.5.1: *Sites impact matrix for SA Objective 4 – Landscape*

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urbanisation
AS1	Residential led	0	0	-	-	-	-	-	-
AS10	Residential led	0	0	0	+/-	+/-	-	-	0
AS11	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	-	0
AS14	Residential led	0	0	-	+/-	+/-	-	-	-
AS15	Residential led	0	0	0	+/-	+/-	-	-	0
AS16	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
AS17	Residential led	0	0	-	+/-	+/-	-	-	-
AS18	Residential led	0	0	-	+/-	+/-	0	-	-
AS2	Residential led	0	0	0	0	0	-	-	0
AS20	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
AS23	Residential led (park homes)	0	0	0	+/-	+/-	0	-	0
AS25	Residential led	0	0	0	+/-	+/-	-	-	-
AS28	Residential led	0	0	0	+/-	+/-	-	-	0
AS29	Residential led	0	0	0	+/-	+/-	0	-	-
AS3	Residential led	0	0	-	-	-	-	-	-
AS5	Residential led (Mixed-use)	0	0	0	-	-	-	-	0
AS6	Residential led (Mixed-use)	0	0	0	-	-	-	-	0
AS7	Non-residential	0	0	0	-	-	-	0	0
AS8	Non-residential	0	0	-	+/-	+/-	-	0	-
AS9	Non-residential	0	0	-	+/-	+/-	-	-	-
CCB1	Residential led	0	0	0	+/-	+/-	0	0	0
CCB10	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB11	Residential led	0	0	0	+/-	+/-	0	0	0
CCB12	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB13	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB15	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB16	Residential led	0	0	0	+/-	+/-	0	0	0
CCB17	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB18	Residential led	0	0	0	+/-	+/-	0	0	0
CCB19	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB2	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB20	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB21	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB22	Residential led	0	0	0	+/-	+/-	0	0	0
CCB23	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB24	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB25	Residential led	0	0	0	+/-	+/-	-	0	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urbanisation
CCB26	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB27	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB28	Residential led	0	0	0	+/-	+/-	0	0	0
CCB29	Residential led	0	0	0	+/-	+/-	-	-	0
CCB3	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB30	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB31	Residential led	0	0	0	+/-	+/-	0	0	0
CCB33	Residential led	0	0	0	+/-	+/-	0	0	0
CCB34	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB35	Non-residential	0	0	0	+/-	+/-	-	0	0
CCB36	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB37	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB38	Residential led	0	0	0	+/-	+/-	0	0	0
CCB39	Residential led	0	0	0	+/-	+/-	0	0	0
CCB4	Residential led	0	0	0	+/-	+/-	0	0	0
CCB40	Residential led	0	0	0	+/-	+/-	-	-	-
CCB41	Residential led	0	0	0	+/-	+/-	0	0	0
CCB43	Residential led	0	0	0	+/-	+/-	0	0	0
CCB44	Residential led	0	0	0	+/-	+/-	0	-	0
CCB46	Residential led	0	0	0	+/-	+/-	0	-	0
CCB48	Residential led	0	0	0	+/-	+/-	0	-	0
CCB49	Residential led	0	0	0	+/-	+/-	0	0	0
CCB5	Non-residential	0	0	0	+/-	+/-	-	0	0
CCB6	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB7	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB8	Residential led	0	0	0	+/-	+/-	0	0	0
CCB9	Residential led	0	0	0	+/-	+/-	0	0	0
CHR1	Residential led	--	0	0	+/-	+/-	0	-	0
CHR10	Residential led	--	0	0	+/-	+/-	-	-	0
CHR11	Residential led	-	0	0	+/-	+/-	0	-	0
CHR13	Residential led (Gypsy and Traveller)	-	-	-	+/-	+/-	0	-	0
CHR14	Residential led (Mixed-use)	-	-	-	+/-	+/-	-	0	0
CHR15	Non-residential	-	0	0	+/-	+/-	0	0	0
CHR16	Non-residential	-	0	0	+/-	+/-	-	0	0
CHR17	Non-residential	-	0	0	+/-	+/-	0	0	0
CHR18	Non-residential	-	0	0	+/-	+/-	-	0	0
CHR19	Non-residential	0	0	0	+/-	+/-	0	0	0
CHR2	Non-residential	--	0	-	+/-	+/-	0	-	0
CHR20	Residential led	0	0	0	+/-	+/-	-	0	0
CHR21	Non-residential	0	0	0	+/-	+/-	0	0	0
CHR3	Non-residential	--	-	-	+/-	+/-	-	-	-
CHR5	Non-residential	-	0	-	+/-	+/-	0	-	0
CHR6	Residential led	-	0	0	+/-	+/-	-	-	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urbanisation
CHR7	Residential led	--	0	-	+/-	+/-	-	-	0
CHR8	Non-residential	-	0	0	+/-	+/-	0	0	0
FH1	Non-residential	-	0	0	+/-	+/-	-	0	0
FP1	Residential led	0	0	0	+/-	+/-	0	0	0
FP10	Residential led	0	0	0	+/-	+/-	0	-	0
FP11	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
FP12	Residential led	0	0	0	+/-	+/-	0	0	0
FP14	Residential led	0	0	0	+/-	+/-	0	0	0
FP16	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
FP17	Residential led	0	0	0	+/-	+/-	0	0	0
FP18	Residential led	0	0	0	+/-	+/-	-	0	0
FP19	Residential led	0	0	0	+/-	+/-	0	0	0
FP2	Residential led	0	0	0	+/-	+/-	0	0	0
FP22	Residential led	0	0	0	+/-	+/-	0	0	0
FP23	Residential led	0	0	0	+/-	+/-	0	0	0
FP25	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
FP4	Residential led	0	0	0	+/-	+/-	0	0	0
FP5	Residential led	0	0	0	+/-	+/-	0	0	0
FP6	Residential led	0	0	0	+/-	+/-	0	0	0
FP7	Residential led	0	0	0	+/-	+/-	0	0	0
FP8	Residential led	0	0	0	+/-	+/-	0	0	0
FP9	Residential led	0	0	0	+/-	+/-	0	0	0
GN10	Residential led	0	0	0	+/-	+/-	0	-	0
GN11	Residential led	0	0	0	+/-	+/-	0	0	0
GN13	Residential led	0	0	0	+/-	+/-	0	0	0
GN14	Residential led	0	0	0	+/-	+/-	-	0	0
GN15	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
GN3	Residential led	0	0	0	+/-	+/-	0	0	0
GN4	Residential led	0	0	0	+/-	+/-	0	-	0
GN5	Residential led	0	0	0	+/-	+/-	0	0	0
GN6	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
GN8	Residential led	0	0	0	+/-	+/-	0	0	0
GS1	Residential led	0	0	0	+/-	+/-	0	0	0
GS10	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS11	Residential led	0	0	0	+/-	+/-	0	0	0
GS12	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS13	Residential led	0	0	0	+/-	+/-	0	0	0
GS14	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS18	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS19	Residential led	0	0	0	+/-	+/-	0	0	0
GS2	Residential led	0	0	0	+/-	+/-	-	-	0
GS20	Residential led	0	0	0	+/-	+/-	0	0	0
GS23	Residential led	0	0	0	+/-	+/-	0	0	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urbanisation
GS24	Residential led	0	0	0	+/-	+/-	0	0	0
GS26	Residential led	0	0	0	+/-	+/-	0	0	0
GS27	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS29	Residential led	0	0	0	+/-	+/-	0	0	0
GS30	Residential led	0	0	0	+/-	+/-	0	0	0
GS32	Residential led	0	0	0	+/-	+/-	0	0	0
GS33	Residential led	0	0	0	+/-	+/-	0	0	0
GS34	Residential led	0	0	0	+/-	+/-	0	0	0
GS35	Residential led	0	0	0	+/-	+/-	0	-	0
GS37	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS4	Residential led	0	0	0	+/-	+/-	0	0	0
GS5	Residential led	0	0	0	+/-	+/-	0	0	0
GS6	Residential led	0	0	0	+/-	+/-	0	0	0
GS7	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS8	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
HHH1	Non-residential	0	0	-	--	--	-	0	-
HHH11	Residential led	0	0	-	-	-	-	-	-
HHH14	Residential led	0	0	-	-	-	0	-	-
HHH15	Residential led	0	0	0	-	-	0	-	0
HHH16	Non-residential	0	0	-	-	-	-	-	-
HHH17	Residential led	0	0	-	-	-	-	-	-
HHH18	Residential led (Mixed-use)	0	0	-	--	--	-	-	-
HHH19	Non-residential	0	0	-	-	-	0	0	-
HHH21	Non-residential	0	0	0	+/-	+/-	0	0	0
HHH23	Residential led (Mixed-use)	0	0	0	-	-	-	-	-
HHH24	Residential led	0	0	-	0	0	-	0	-
HHH25	Residential led	0	0	-	0	0	-	-	-
HHH28	Residential led (Mixed-use)	0	0	-	-	-	-	-	0
HHH29	Residential led (Mixed-use)	0	0	-	-	-	-	-	-
HHH30	Residential led (Mixed-use)	0	0	0	0	0	-	0	-
HHH32	Residential led	0	0	0	--	--	-	0	-
HHH33	Residential led	0	0	-	0	0	-	-	-
HHH37	Non-residential	0	0	0	0	0	0	0	0
HHH38	Non-residential	0	0	0	0	0	0	0	0
HHH39	Non-residential	0	0	0	0	0	0	0	0
HHH4	Residential led	0	0	0	+/-	+/-	-	-	0
HHH40	Residential led	0	0	-	-	-	0	-	-
HHH41	Residential led	0	0	0	-	-	-	0	0
HHH5	Residential led	0	0	-	--	--	-	-	-
HHH7	Residential led	0	0	-	--	--	-	-	-
HHH8	Residential led (Mixed-use)	0	0	-	-	-	-	-	-
HHH9	Residential led	0	0	0	-	-	0	-	-
HW11	Residential led	-	-	0	+/-	+/-	0	-	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urbanisation
HW3	Residential and secondary school	-	0	-	+/-	+/-	-	-	-
HW5	Non-residential	-	-	0	+/-	+/-	0	0	0
HW6	Residential led	-	0	-	+/-	+/-	-	-	0
HW7	Residential or non-residential	-	0	0	+/-	+/-	0	-	0
HW8	Residential led	0	0	0	+/-	+/-	0	0	0
L11	Residential led	0	0	0	+/-	+/-	-	0	0
L12	Residential led	0	0	0	+/-	+/-	0	0	0
L2	Residential led	0	0	0	+/-	+/-	0	0	0
L3	Residential led	0	0	0	+/-	+/-	0	0	0
L7	Residential led	0	0	0	+/-	+/-	0	0	0
L9	Residential led	0	0	0	+/-	+/-	0	0	0
LW10	Residential led	-	-	0	+/-	+/-	0	-	0
LW2	Residential led	0	0	0	+/-	+/-	0	-	0
LW3	Residential led	0	0	0	+/-	+/-	0	0	0
LW4	Residential led	-	-	-	+/-	+/-	-	-	-
LW5	Residential led (C2 use)	0	0	0	+/-	+/-	0	0	0
LW7	Residential led	-	-	-	+/-	+/-	-	-	-
PP1	Residential led	0	-	0	+/-	+/-	0	-	0
REWW3	Residential led	0	0	0	+/-	+/-	0	0	0
RN1	Residential led	0	-	-	+/-	+/-	-	-	-
RN10	Residential led	0	-	-	+/-	+/-	0	-	-
RN11	Residential led	0	0	0	+/-	+/-	0	-	0
RN12	Non-residential	0	0	0	+/-	+/-	0	-	0
RN14	Residential led	0	-	-	+/-	+/-	0	-	0
RN16	Residential led	0	-	0	+/-	+/-	-	-	0
RN17	Residential led	0	-	-	+/-	+/-	-	-	0
RN18	Residential led	0	0	0	+/-	+/-	0	0	0
RN19	Residential led	0	-	0	+/-	+/-	0	-	0
RN2	Residential led (Mixed-use)	0	-	-	+/-	+/-	-	-	-
RN22	Residential led	0	0	0	+/-	+/-	0	0	0
RN23	Residential led	0	-	-	+/-	+/-	0	-	-
RN24	Residential led	0	0	0	+/-	+/-	0	0	0
RN25	Residential led	0	-	0	+/-	+/-	0	-	0
RN26	Residential led (Mixed-use)	0	-	-	+/-	+/-	-	-	-
RN27	Residential led	0	-	-	+/-	+/-	-	-	-
RN28	Residential led	-	0	0	+/-	+/-	0	-	0
RN29	Residential led	0	0	0	+/-	+/-	0	0	0
RN3	Residential led	0	0	0	+/-	+/-	0	0	0
RN30	Residential led	-	0	-	+/-	+/-	0	-	0
RN31	Residential led	-	0	-	+/-	+/-	0	-	0
RN32	Residential led	-	0	-	+/-	+/-	0	-	0
RN33	Non-residential	-	0	-	+/-	+/-	0	-	0
RN34	Residential led	0	-	0	+/-	+/-	0	-	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urbanisation
RN4	Residential led (Mixed-use)	0	-	-	+/-	+/-	-	-	-
RN5	Residential led (Mixed-use)	0	-	-	+/-	+/-	0	-	-
RSE1	Non-residential	--	0	0	+/-	+/-	0	0	0
RSE11	Non-residential	-	0	0	+/-	+/-	0	-	0
RSE4	Residential led	--	0	0	+/-	+/-	0	-	0
RSE8	Residential led (Mixed-use)	-	0	-	+/-	+/-	-	0	0
RSE9	Residential led	-	0	-	+/-	+/-	0	0	0
RWB1	Residential led	-	0	0	+/-	+/-	-	-	0
RWB10	Non-residential	0	0	0	+/-	+/-	0	0	0
RWB11	Residential led	0	0	0	+/-	+/-	0	0	0
RWB12	Residential led	0	0	0	+/-	+/-	0	0	0
RWB14	Residential led	0	0	0	+/-	+/-	0	0	0
RWB15	Residential led	0	0	0	+/-	+/-	0	0	0
RWB17	Residential led	0	0	0	+/-	+/-	0	0	0
RWB18	Residential led	0	0	0	+/-	+/-	0	0	0
RWB19	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
RWB2	Residential led	-	0	0	+/-	+/-	-	0	0
RWB20	Residential led	0	0	0	+/-	+/-	0	0	0
RWB21	Residential led	0	0	0	+/-	+/-	0	0	0
RWB23	Non-residential	0	0	0	+/-	+/-	0	0	0
RWB25	Residential led	0	0	0	+/-	+/-	-	0	0
RWB3	Residential led	-	0	0	+/-	+/-	-	0	0
RWB4	Residential led	0	0	0	+/-	+/-	-	-	0
RWB5	Non-residential	-	0	-	+/-	+/-	-	0	0
RWB6	Residential led	0	0	0	+/-	+/-	0	-	0
RWB8	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
RWB9	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SMI1	Residential led	0	0	0	+/-	+/-	-	0	0
SMI2	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF1	Residential led	0	0	0	+/-	+/-	-	-	0
SNF10	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF12	Residential led	0	0	0	+/-	+/-	0	0	0
SNF13	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF15	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF16	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF17	Residential led	0	0	0	+/-	+/-	0	0	0
SNF18	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF19	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF2	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	-	0
SNF20	Residential led	0	0	0	+/-	+/-	0	0	0
SNF21	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
SNF22	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
SNF23	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urbanisation
SNF24	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF25	Non-residential	0	0	0	+/-	+/-	-	0	0
SNF26	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF27	Residential led	0	0	0	+/-	+/-	0	0	0
SNF28	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF30	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF31	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF32	Residential led	0	0	0	+/-	+/-	0	0	0
SNF33	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF34	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF35	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF36	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF37	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF38	Residential led	0	0	0	+/-	+/-	0	-	0
SNF39	Residential led	0	0	0	+/-	+/-	0	0	0
SNF41	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	-	0
SNF43	Residential led	0	0	0	+/-	+/-	-	-	-
SNF44	Residential led	0	0	0	+/-	+/-	0	0	0
SNF5	Residential led	0	0	0	+/-	+/-	0	-	0
SNF6	Residential led	0	0	0	+/-	+/-	0	0	0
SNF8	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	-	0
SNF9	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	-	0
SR1	Residential led	0	0	0	+/-	+/-	0	-	0
SR10	Residential led	0	0	0	+/-	+/-	0	-	0
SR13	Residential led	0	0	0	+/-	+/-	-	-	0
SR14	Residential led	0	0	-	+/-	+/-	0	-	0
SR15	Residential led	0	0	-	+/-	+/-	-	-	0
SR16	Residential led	0	0	-	+/-	+/-	-	-	0
SR18	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	0
SR2	Non-residential	0	0	-	+/-	+/-	-	-	0
SR21	Residential led	0	0	-	+/-	+/-	-	-	-
SR22	Residential led	0	0	-	+/-	+/-	0	-	0
SR24	Residential led	0	0	0	+/-	+/-	-	-	0
SR25	Residential led	0	0	-	--	--	-	-	-
SR27	Residential led	0	0	-	--	--	-	0	0
SR29	Non-residential	0	0	0	+/-	+/-	0	0	0
SR3	Residential led	0	0	-	+/-	+/-	0	-	0
SR30	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR31	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR32	Residential led (Mixed-use)	0	0	-	--	--	-	-	-
SR33	Non-residential	0	0	0	+/-	+/-	0	0	0
SR34	Residential led	0	0	0	+/-	+/-	0	0	0
SR35	Non-residential	0	0	0	+/-	+/-	0	0	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urbanisation
SR36	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR37	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR38	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR39	Residential led (Mixed-use)	0	0	-	--	--	-	0	-
SR4	Residential led	0	0	-	+/-	+/-	0	0	-
SR40	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR41	Residential led (Mixed-use)	0	0	-	--	--	0	-	-
SR42	Residential led	0	0	-	+/-	+/-	-	-	-
SR43	Residential led	0	0	-	+/-	+/-	0	-	-
SR45	Non-residential	0	0	0	+/-	+/-	-	-	0
SR46	Residential led	0	0	0	+/-	+/-	-	-	-
SR47	Residential led	0	0	0	+/-	+/-	-	-	0
SR48	Residential led	0	0	0	+/-	+/-	-	-	0
SR49	Residential led	0	0	0	+/-	+/-	-	-	0
SR5	Residential led	0	0	-	+/-	+/-	-	-	0
SR50	Residential led	0	0	0	+/-	+/-	-	0	0
SR51	Residential led (Mixed-use)	0	0	-	+/-	+/-	0	-	-
SR52	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
SR6	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
SR7	Residential led	0	0	-	+/-	+/-	-	-	0
SR8	Residential led	0	0	-	+/-	+/-	-	-	0
SW1	Residential led	0	0	0	+/-	+/-	0	0	0
SW2	Residential led	0	0	0	+/-	+/-	0	0	0
SW3	Residential led	0	0	0	+/-	+/-	0	0	0
SW5	Residential led	0	0	0	+/-	+/-	0	0	0
SW6	Residential led	0	0	0	+/-	+/-	0	0	0
SW7	Residential led	0	0	0	+/-	+/-	0	0	0
SW8	Residential led	0	0	0	+/-	+/-	0	0	0
T1	Non-residential	0	0	0	+/-	+/-	0	-	0
T2	Residential led	0	0	0	+/-	+/-	0	-	0
T3	Residential led	0	0	0	+/-	+/-	0	-	0
W1	Residential led	0	0	0	+/-	+/-	0	0	0
W11	Non-residential	0	0	0	+/-	+/-	-	-	-
W12	Residential led	0	0	0	+/-	+/-	0	0	0
W13	Non-residential	0	0	0	+/-	+/-	0	0	0
W14	Non-residential	0	0	0	+/-	+/-	0	0	0
W3	Residential led	0	0	0	+/-	+/-	0	0	0
W4	Residential led	0	0	0	+/-	+/-	0	0	0
W7	Residential led	0	0	0	+/-	+/-	0	0	0
W8	Residential led	0	0	0	+/-	+/-	0	-	0

G.6 SA Objective 5: Pollution and waste

G.6.1 Air Quality Management Area

G.6.1.1 There are four small Air Quality Management Areas (AQMA) within Medway. These are located along sections of main roads where national air quality objectives are unlikely to be met. Some 115 sites are located wholly or partially within 200m of an AQMA, where proposed development at these sites is likely to locate site end users in areas of existing poor air quality. A minor negative impact on air pollution is identified for these sites.

G.6.1.2 The proposed development at the remaining 220 sites which are over 200m from an AQMA are likely to have a negligible impact on AQMAs.

G.6.2 Main Road

G.6.2.1 Many major roads pass through Medway, including the A2, A226, A228, A229, A278, A230, A231 and the M2. Approximately two-thirds (208) of sites are located within 200m of a main road, including the majority of the Strood North and Frindsbury ward being located next to the A2 and A228. The proposed development at these 208 sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites.

G.6.2.2 The proposed development at the remaining 127 sites which are over 200m from a main road are expected to have a negligible impact on air and noise pollution from transportation associated with main roads.

G.6.3 Railway Line

G.6.3.1 Multiple railway lines pass through Medway, including the Hoo Peninsula freight line in the north. Passenger railway lines continue through and adjacent to the urban area of Medway and in the more rural areas in the south west. Some 119 sites are located largely or partially within 200m of a railway line which is likely to expose site end users to noise pollution and vibrations. A minor negative impact is identified for these 119 sites.

G.6.3.2 The proposed development at the remaining 216 sites which are over 200m from a railway line is expected to have a negligible impact on air and noise pollution from transportation associated with railway lines.

G.6.4 Watercourse

G.6.4.1 Medway's watercourse network comprises the River Medway and its tributaries, as well as tributaries of the River Thames and the Swale. The River Medway runs through the centre of the Plan area, whereas the majority of smaller rivers run through the rural areas in the north. A total of 32 sites coincide with, or are located within 10m of, various watercourses. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality.

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G.6.4.2 Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location. At this stage, the potential effects of these 303 sites on water quality are uncertain and would depend upon implementation.

G.6.5 Groundwater Source Protection Zone

G.6.5.1 Source Protection Zones (SPZs) for groundwater within Medway are located to the south. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. 151 sites are located wholly or partially within an SPZ, the majority being in zone 3. Some wards are more severely impacted than others, such as the Strood North and Frindsbury ward which has 32 sites located in SPZ 1 or 2, which require a higher level of source protection. Consequently, these all have potential to result in a minor negative against for pollution and waste. The remaining sites do not coincide with the catchment of any SPZ, and therefore, the proposed development at these sites may have a negligible impact on groundwater quality.

G.6.6 Potential increase in air pollution

G.6.6.1 Of the 288 sites proposed for residential-led use, 59 sites have capacity for the development of 100 or more dwellings. The proposed development at these larger scale sites could potentially result in a significant increase in local air pollution, potentially resulting in a major negative impact.

G.6.6.2 Of the 46 sites proposed for non-residential use, 27 sites are proposed for employment-led end use and comprise over 1ha. The proposed development at these sites could potentially result in a significant increase in local air pollution, potentially resulting in a major negative impact.

G.6.6.3 Some 133 sites proposed for residential-led use have capacity for the development of between 10 and 99 dwellings, and 20 sites are proposed for employment-led end use and comprise between 0.1 and 1ha. The proposed development at these 153 sites could potentially have a minor negative impact on air pollution in the local area.

G.6.6.4 Some 90 residential sites are proposed for the development of less than 10 dwellings. One employment site (W14) comprises less than 0.1ha. The proposed impact on air pollution at these 91 sites is expected to be negligible, in comparison to the larger scale sites identified above.

G.6.6.5 Site AS23 is proposed for the development of park homes. Site LW5 is proposed for C2 residential use. The proposed use at Site HW7 is uncertain, being either residential or non-residential. Site CHR13 is proposed for Gypsy and Traveller pitches. At the time of writing the number of dwellings proposed at Site HHH18 is unknown. The potential increase in air pollution as a result of the proposed development at these five sites is uncertain.

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G.6.7 Waste

G.6.7.1 The estimated total household waste produced within Medway in 2023/2024 was 113,851 tonnes, according to UK local authority household waste data[13]. Residential-led development is likely to result in an increase in household waste generation, to some extent.

G.6.7.2 The appraisal of reasonable alternatives sites is limited in its assessment of waste, due to an absence of site-specific details. Sites proposed for employment or non-residential end use may present further negative effects on waste production; however, this would be dependent on the site-specific proposals and the nature of development, which is unknown at the time of assessment. The waste likely to be generated as a result of each development site is currently uncertain.

Table G.6.1: *Sites impact matrix for SA Objective 5 – Pollution*

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
AS1	Residential led	0	-	0	+/-	0	-	+/-
AS10	Residential led	0	-	0	+/-	0	0	+/-
AS11	Residential led (mixed-use)	0	-	0	+/-	0	-	+/-
AS14	Residential led	0	-	0	+/-	0	-	+/-
AS15	Residential led	0	-	0	+/-	0	-	+/-
AS16	Residential led (mixed-use)	0	-	0	+/-	0	-	+/-
AS17	Residential led	0	-	-	+/-	0	--	+/-
AS18	Residential led	0	0	0	+/-	0	-	+/-
AS2	Residential led	0	-	0	+/-	0	0	+/-
AS20	Residential led (mixed-use)	0	0	0	+/-	0	--	+/-
AS23	Residential led (park homes)	0	0	0	+/-	0	+/-	+/-
AS25	Residential led	0	-	0	+/-	0	-	+/-
AS28	Residential led	0	0	0	+/-	0	-	+/-
AS29	Residential led	0	0	0	+/-	0	0	+/-
AS3	Residential led	0	-	0	+/-	0	-	+/-
AS5	Residential led (mixed-use)	0	-	0	+/-	0	-	+/-
AS6	Residential led (mixed-use)	0	-	0	+/-	0	-	+/-
AS7	Non-residential	0	-	0	+/-	0	-	+/-
AS8	Non-residential	0	-	0	+/-	0	--	+/-
AS9	Non-residential	0	-	0	-	0	--	+/-
CCB1	Residential led	-	-	-	+/-	0	-	+/-
CCB10	Residential led (mixed-use)	-	-	0	+/-	0	-	+/-
CCB11	Residential led	-	-	0	+/-	0	-	+/-
CCB12	Residential led (mixed-use)	-	-	0	+/-	0	-	+/-
CCB13	Residential led (mixed-use)	-	-	0	+/-	0	--	+/-
CCB15	Residential led (mixed-use)	-	-	0	+/-	0	-	+/-
CCB16	Residential led	0	-	0	+/-	0	-	+/-
CCB17	Residential led (mixed-use)	-	-	0	+/-	0	-	+/-

[13] Department for Environment, Food and Rural Affairs (2025) Local Authority Collected Waste Statistics for 2023/2024. Available at: www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results [Date accessed: 24/04/25]

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
CCB18	Residential led	0	-	0	+/-	0	--	+/-
CCB19	Residential led (mixed-use)	-	-	0	+/-	-	-	+/-
CCB2	Residential led (mixed-use)	-	-	-	+/-	0	0	+/-
CCB20	Residential led (mixed-use)	-	-	0	+/-	-	-	+/-
CCB21	Residential led (mixed-use)	-	-	0	+/-	-	-	+/-
CCB22	Residential led	-	-	0	+/-	0	-	+/-
CCB23	Residential led (mixed-use)	-	-	0	+/-	-	0	+/-
CCB24	Residential led (mixed-use)	-	-	0	+/-	-	0	+/-
CCB25	Residential led	0	-	0	-	0	--	+/-
CCB26	Residential led (mixed-use)	-	-	0	+/-	-	-	+/-
CCB27	Residential led (mixed-use)	-	-	0	+/-	-	-	+/-
CCB28	Residential led	-	-	-	+/-	-	-	+/-
CCB29	Residential led	0	-	0	+/-	0	0	+/-
CCB3	Residential led (mixed-use)	-	-	0	+/-	0	-	+/-
CCB30	Residential led (mixed-use)	-	-	0	+/-	-	-	+/-
CCB31	Residential led	-	-	0	+/-	-	--	+/-
CCB33	Residential led	0	-	0	+/-	0	0	+/-
CCB34	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
CCB35	Non-residential	0	0	0	+/-	0	--	+/-
CCB36	Residential led (mixed-use)	-	-	-	+/-	-	0	+/-
CCB37	Residential led (mixed-use)	-	-	0	+/-	-	--	+/-
CCB38	Residential led	-	-	-	+/-	-	0	+/-
CCB39	Residential led	-	-	-	+/-	-	-	+/-
CCB4	Residential led	-	-	-	+/-	0	-	+/-
CCB40	Residential led	0	-	0	+/-	-	0	+/-
CCB41	Residential led	-	-	-	+/-	-	0	+/-
CCB43	Residential led	0	-	0	+/-	0	-	+/-
CCB44	Residential led	-	-	-	+/-	-	0	+/-
CCB46	Residential led	-	-	-	+/-	-	0	+/-
CCB48	Residential led	0	-	0	+/-	0	-	+/-
CCB49	Residential led	-	-	-	+/-	0	--	+/-
CCB5	Non-residential	-	-	0	-	0	--	+/-
CCB6	Residential led (mixed-use)	-	-	0	+/-	0	-	+/-
CCB7	Residential led (mixed-use)	-	-	0	+/-	0	0	+/-
CCB8	Residential led	-	-	0	+/-	0	--	+/-
CCB9	Residential led	-	-	-	+/-	0	-	+/-
CHR1	Residential led	0	0	0	+/-	-	-	+/-
CHR10	Residential led	0	-	-	+/-	-	0	+/-
CHR11	Residential led	0	-	-	+/-	-	0	+/-
CHR13	Residential led (Gypsy and Traveller)	0	-	-	+/-	-	+/-	+/-
CHR14	Residential led (mixed-use)	0	-	-	-	-	-	+/-
CHR15	Non-residential	0	-	-	+/-	-	-	+/-
CHR16	Non-residential	0	-	-	+/-	-	--	+/-
CHR17	Non-residential	0	-	-	+/-	-	--	+/-
CHR18	Non-residential	0	-	-	+/-	-	--	+/-

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
CHR19	Non-residential	-	-	-	+/-	-	--	+/-
CHR2	Non-residential	0	0	0	+/-	-	--	+/-
CHR20	Residential led	0	0	-	+/-	-	--	+/-
CHR21	Non-residential	-	-	-	+/-	-	--	+/-
CHR3	Non-residential	0	0	-	+/-	-	--	+/-
CHR5	Non-residential	0	-	0	+/-	-	-	+/-
CHR6	Residential led	0	-	-	+/-	-	-	+/-
CHR7	Residential led	0	-	-	+/-	-	--	+/-
CHR8	Non-residential	0	-	-	+/-	-	-	+/-
FH1	Non-residential	0	-	0	+/-	-	--	+/-
FP1	Residential led	-	-	-	+/-	0	-	+/-
FP10	Residential led	0	0	0	+/-	0	--	+/-
FP11	Residential led (mixed-use)	-	-	-	-	0	--	+/-
FP12	Residential led	-	-	-	+/-	0	-	+/-
FP14	Residential led	-	-	0	+/-	0	0	+/-
FP16	Residential led (mixed-use)	-	-	0	+/-	0	0	+/-
FP17	Residential led	-	-	-	+/-	0	0	+/-
FP18	Residential led	-	0	0	-	0	-	+/-
FP19	Residential led	-	-	-	+/-	0	--	+/-
FP2	Residential led	-	-	-	+/-	0	0	+/-
FP22	Residential led	0	-	0	+/-	0	-	+/-
FP23	Residential led	-	-	0	+/-	0	-	+/-
FP25	Residential led (mixed-use)	-	-	-	+/-	0	--	+/-
FP4	Residential led	-	-	-	+/-	0	0	+/-
FP5	Residential led	-	-	-	-	0	-	+/-
FP6	Residential led	-	-	-	+/-	0	--	+/-
FP7	Residential led	-	-	-	-	0	-	+/-
FP8	Residential led	0	0	0	+/-	0	-	+/-
FP9	Residential led	-	-	-	-	0	-	+/-
GN10	Residential led	0	-	0	+/-	0	0	+/-
GN11	Residential led	0	0	-	+/-	0	0	+/-
GN13	Residential led	0	-	0	+/-	0	-	+/-
GN14	Residential led	-	-	0	+/-	0	-	+/-
GN15	Residential led (mixed-use)	-	-	0	-	0	--	+/-
GN3	Residential led	-	-	0	+/-	0	--	+/-
GN4	Residential led	-	-	0	+/-	0	0	+/-
GN5	Residential led	0	0	-	+/-	0	0	+/-
GN6	Residential led (mixed-use)	-	-	0	+/-	0	--	+/-
GN8	Residential led	0	0	0	+/-	0	-	+/-
GS1	Residential led	0	-	0	+/-	0	-	+/-
GS10	Residential led (mixed-use)	0	-	0	+/-	0	-	+/-
GS11	Residential led	0	0	-	+/-	-	0	+/-
GS12	Residential led (mixed-use)	0	-	-	+/-	0	0	+/-
GS13	Residential led	0	-	-	+/-	0	-	+/-
GS14	Residential led (mixed-use)	0	-	-	+/-	0	0	+/-

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
GS18	Residential led (mixed-use)	0	-	-	+/-	0	-	+/-
GS19	Residential led	0	-	-	+/-	0	-	+/-
GS2	Residential led	-	-	-	+/-	-	-	+/-
GS20	Residential led	0	0	0	+/-	-	0	+/-
GS23	Residential led	0	0	0	+/-	-	0	+/-
GS24	Residential led	0	-	-	+/-	-	-	+/-
GS26	Residential led	0	-	-	+/-	0	-	+/-
GS27	Residential led (mixed-use)	0	-	-	+/-	0	0	+/-
GS29	Residential led	0	-	-	+/-	0	-	+/-
GS30	Residential led	0	-	-	+/-	0	0	+/-
GS32	Residential led	0	-	0	+/-	-	0	+/-
GS33	Residential led	-	-	0	+/-	-	-	+/-
GS34	Residential led	0	-	0	+/-	-	0	+/-
GS35	Residential led	-	-	0	+/-	-	-	+/-
GS37	Residential led (mixed-use)	0	-	-	+/-	0	--	+/-
GS4	Residential led	0	-	0	+/-	0	-	+/-
GS5	Residential led	0	-	0	+/-	0	0	+/-
GS6	Residential led	0	0	-	+/-	-	0	+/-
GS7	Residential led (mixed-use)	0	-	-	+/-	0	-	+/-
GS8	Residential led (mixed-use)	0	-	0	+/-	0	0	+/-
HHH1	Non-residential	0	0	0	+/-	0	--	+/-
HHH11	Residential led	0	-	0	+/-	0	--	+/-
HHH14	Residential led	0	-	0	+/-	0	--	+/-
HHH15	Residential led	0	0	-	+/-	0	0	+/-
HHH16	Non-residential	0	-	0	+/-	0	--	+/-
HHH17	Residential led	0	-	0	+/-	0	-	+/-
HHH18	Residential led (mixed-use)	0	0	-	-	0	+/-	+/-
HHH19	Non-residential	0	-	0	-	0	--	+/-
HHH21	Non-residential	0	0	0	+/-	0	-	+/-
HHH23	Residential led (mixed-use)	0	0	0	+/-	0	-	+/-
HHH24	Residential led	0	0	0	+/-	0	--	+/-
HHH25	Residential led	0	0	0	+/-	0	--	+/-
HHH28	Residential led (mixed-use)	0	-	0	+/-	0	-	+/-
HHH29	Residential led (mixed-use)	0	0	0	+/-	0	-	+/-
HHH30	Residential led (mixed-use)	0	0	-	-	0	-	+/-
HHH32	Residential led	0	0	0	+/-	0	0	+/-
HHH33	Residential led	0	0	0	+/-	0	--	+/-
HHH37	Non-residential	0	0	-	+/-	0	--	+/-
HHH38	Non-residential	0	0	0	-	0	--	+/-
HHH39	Non-residential	0	0	-	+/-	0	--	+/-
HHH4	Residential led	0	0	0	+/-	0	0	+/-
HHH40	Residential led	0	0	0	+/-	0	-	+/-
HHH41	Residential led	0	-	0	+/-	0	-	+/-
HHH5	Residential led	-	-	0	+/-	0	-	+/-
HHH7	Residential led	0	-	0	-	0	--	+/-

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
HHH8	Residential led (mixed-use)	-	-	0	-	0	--	+/-
HHH9	Residential led	0	0	0	-	0	0	+/-
HW11	Residential led	0	0	0	+/-	-	-	+/-
HW3	Residential and secondary school	0	0	0	+/-	-	-	+/-
HW5	Non-residential	0	-	0	+/-	-	--	+/-
HW6	Residential led	0	-	0	+/-	-	-	+/-
HW7	Residential or non-residential	0	-	0	+/-	-	+/-	+/-
HW8	Residential led	0	0	0	+/-	-	0	+/-
L11	Residential led	-	-	0	+/-	-	0	+/-
L12	Residential led	-	-	0	+/-	-	-	+/-
L2	Residential led	0	0	0	+/-	-	0	+/-
L3	Residential led	-	0	0	+/-	-	0	+/-
L7	Residential led	-	0	0	+/-	-	0	+/-
L9	Residential led	-	0	0	+/-	-	-	+/-
LW10	Residential led	0	0	0	+/-	-	0	+/-
LW2	Residential led	0	0	0	+/-	-	-	+/-
LW3	Residential led	0	0	0	+/-	-	-	+/-
LW4	Residential led	0	0	0	+/-	-	--	+/-
LW5	Residential led (C2 use)	0	0	0	+/-	-	+/-	+/-
LW7	Residential led	0	0	0	+/-	-	--	+/-
PP1	Residential led	0	0	0	+/-	-	-	+/-
REWW3	Residential led	0	-	0	+/-	-	-	+/-
RN1	Residential led	0	-	0	+/-	0	--	+/-
RN10	Residential led	0	0	0	+/-	0	-	+/-
RN11	Residential led	0	0	-	+/-	0	-	+/-
RN12	Non-residential	0	0	0	+/-	0	-	+/-
RN14	Residential led	0	0	0	+/-	0	-	+/-
RN16	Residential led	0	0	0	+/-	0	-	+/-
RN17	Residential led	0	0	0	+/-	0	-	+/-
RN18	Residential led	0	0	-	+/-	0	0	+/-
RN19	Residential led	0	0	0	+/-	0	0	+/-
RN2	Residential led (mixed-use)	0	-	-	+/-	0	--	+/-
RN22	Residential led	0	0	0	+/-	0	0	+/-
RN23	Residential led	0	0	0	+/-	0	-	+/-
RN24	Residential led	-	-	-	+/-	0	0	+/-
RN25	Residential led	0	0	0	+/-	0	0	+/-
RN26	Residential led (mixed-use)	0	0	0	+/-	0	-	+/-
RN27	Residential led	0	0	0	+/-	0	--	+/-
RN28	Residential led	0	-	-	+/-	0	-	+/-
RN29	Residential led	0	0	0	+/-	0	-	+/-
RN3	Residential led	0	-	0	+/-	-	0	+/-
RN30	Residential led	0	0	-	+/-	0	-	+/-
RN31	Residential led	0	0	0	+/-	0	-	+/-
RN32	Residential led	0	-	-	+/-	0	-	+/-
RN33	Non-residential	0	0	0	+/-	0	--	+/-

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
RN34	Residential led	0	-	0	+/-	0	-	+/-
RN4	Residential led (mixed-use)	0	0	0	+/-	0	--	+/-
RN5	Residential led (mixed-use)	0	0	0	+/-	0	--	+/-
RSE1	Non-residential (road spur and open space)	0	0	0	+/-	-	--	+/-
RSE11	Non-residential	0	-	0	+/-	0	-	+/-
RSE4	Residential led	0	-	0	+/-	-	0	+/-
RSE8	Residential led (mixed-use)	0	0	0	+/-	0	-	+/-
RSE9	Residential led	0	0	0	+/-	0	-	+/-
RWB1	Residential led	0	-	-	-	-	-	+/-
RWB10	Non-residential	-	-	-	+/-	-	-	+/-
RWB11	Residential led	-	-	-	+/-	-	0	+/-
RWB12	Residential led	-	-	0	+/-	-	0	+/-
RWB14	Residential led	-	-	-	+/-	-	-	+/-
RWB15	Residential led	-	-	-	+/-	-	-	+/-
RWB17	Residential led	-	-	-	+/-	-	0	+/-
RWB18	Residential led	-	-	-	+/-	-	0	+/-
RWB19	Residential led (mixed-use)	-	-	-	+/-	-	--	+/-
RWB2	Residential led	0	0	0	+/-	-	-	+/-
RWB20	Residential led	-	-	-	+/-	-	-	+/-
RWB21	Residential led	-	-	-	+/-	0	-	+/-
RWB23	Non-residential	-	-	-	+/-	0	-	+/-
RWB25	Residential led	0	0	0	-	-	--	+/-
RWB3	Residential led	0	0	0	+/-	-	0	+/-
RWB4	Residential led	0	0	0	+/-	-	0	+/-
RWB5	Non-residential	0	-	0	+/-	-	--	+/-
RWB6	Residential led	0	0	0	+/-	-	0	+/-
RWB8	Residential led (mixed-use)	-	-	-	+/-	-	0	+/-
RWB9	Residential led (mixed-use)	-	-	-	+/-	-	0	+/-
SMI1	Residential led	0	-	0	+/-	0	--	+/-
SMI2	Non-residential	0	-	0	+/-	0	-	+/-
SNF1	Residential led	0	-	0	+/-	-	--	+/-
SNF10	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
SNF12	Residential led	0	0	0	+/-	-	0	+/-
SNF13	Residential led (mixed-use)	-	-	-	+/-	-	--	+/-
SNF15	Residential led (mixed-use)	-	-	-	+/-	-	--	+/-
SNF16	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
SNF17	Residential led	-	-	-	+/-	-	0	+/-
SNF18	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
SNF19	Non-residential	-	-	-	+/-	-	-	+/-
SNF2	Residential led (mixed-use)	0	-	0	+/-	-	-	+/-
SNF20	Residential led	-	-	-	+/-	-	-	+/-
SNF21	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
SNF22	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
SNF23	Residential led (mixed-use)	-	-	-	+/-	-	0	+/-
SNF24	Residential led (mixed-use)	-	-	-	+/-	-	0	+/-

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
SNF25	Non-residential	-	-	-	+/-	-	--	+/-
SNF26	Non-residential	0	-	-	-	-	--	+/-
SNF27	Residential led	-	-	-	+/-	-	-	+/-
SNF28	Non-residential	-	-	-	+/-	-	-	+/-
SNF30	Residential led (mixed-use)	-	-	-	+/-	-	0	+/-
SNF31	Residential led (mixed-use)	-	-	-	+/-	-	0	+/-
SNF32	Residential led	-	-	-	+/-	-	0	+/-
SNF33	Non-residential	-	-	-	+/-	-	-	+/-
SNF34	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
SNF35	Residential led (mixed-use)	-	-	-	+/-	-	--	+/-
SNF36	Residential led (mixed-use)	-	-	-	+/-	-	0	+/-
SNF37	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
SNF38	Residential led	-	-	-	+/-	-	-	+/-
SNF39	Residential led	-	-	-	+/-	-	--	+/-
SNF41	Residential led (mixed-use)	-	0	-	-	-	--	+/-
SNF43	Residential led	0	0	-	+/-	-	--	+/-
SNF44	Residential led	-	-	0	+/-	-	0	+/-
SNF5	Residential led	0	-	0	+/-	-	0	+/-
SNF6	Residential led	0	-	0	+/-	-	0	+/-
SNF8	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
SNF9	Residential led (mixed-use)	-	-	-	+/-	-	-	+/-
SR1	Residential led	0	-	-	+/-	-	-	+/-
SR10	Residential led	0	-	-	+/-	0	-	+/-
SR13	Residential led	0	-	0	+/-	-	-	+/-
SR14	Residential led	0	0	0	+/-	0	-	+/-
SR15	Residential led	0	-	0	+/-	-	-	+/-
SR16	Residential led	0	0	0	+/-	0	--	+/-
SR18	Residential led (mixed-use)	0	0	0	+/-	0	-	+/-
SR2	Non-residential	0	0	0	+/-	0	--	+/-
SR21	Residential led	0	0	0	+/-	0	-	+/-
SR22	Residential led	0	0	0	+/-	0	0	+/-
SR24	Residential led	0	0	0	+/-	0	-	+/-
SR25	Residential led (mixed-use)	-	-	0	+/-	-	--	+/-
SR27	Residential led	0	-	0	+/-	-	-	+/-
SR29	Non-residential	0	0	0	+/-	0	-	+/-
SR3	Residential led	0	0	0	+/-	-	0	+/-
SR30	Residential led (mixed-use)	0	0	0	+/-	-	--	+/-
SR31	Residential led (mixed-use)	0	0	0	-	0	--	+/-
SR32	Residential led (mixed-use)	0	0	0	-	0	-	+/-
SR33	Non-residential	0	0	0	+/-	0	-	+/-
SR34	Residential led	0	0	0	+/-	0	-	+/-
SR35	Non-residential	0	0	0	-	0	-	+/-
SR36	Residential led (mixed-use)	0	0	0	-	0	--	+/-
SR37	Residential led (mixed-use)	0	0	0	-	0	--	+/-
SR38	Residential led (mixed-use)	0	0	0	-	0	--	+/-

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
SR39	Residential led (mixed-use)	0	-	0	-	0	--	+/-
SR4	Residential led	0	0	0	+/-	0	--	+/-
SR40	Residential led (mixed-use)	0	0	0	-	0	--	+/-
SR41	Residential led (mixed-use)	-	-	0	+/-	0	-	+/-
SR42	Residential led	0	0	0	+/-	0	--	+/-
SR43	Residential led	0	0	0	+/-	0	-	+/-
SR45	Non-residential	0	0	0	+/-	0	-	+/-
SR46	Residential led	0	0	0	+/-	0	-	+/-
SR47	Residential led	0	0	0	+/-	0	0	+/-
SR48	Residential led	0	0	0	-	0	0	+/-
SR49	Residential led	0	0	0	-	0	0	+/-
SR5	Residential led	0	-	-	+/-	-	--	+/-
SR50	Residential led	0	0	0	-	0	0	+/-
SR51	Residential led (mixed-use)	0	0	0	+/-	0	--	+/-
SR52	Residential led (mixed-use)	0	0	0	+/-	0	--	+/-
SR6	Residential led (mixed-use)	0	0	0	+/-	0	--	+/-
SR7	Residential led	0	0	0	+/-	0	-	+/-
SR8	Residential led	0	0	0	+/-	-	-	+/-
SW1	Residential led	0	0	0	+/-	-	-	+/-
SW2	Residential led	0	0	0	+/-	-	--	+/-
SW3	Residential led	0	0	0	+/-	-	0	+/-
SW5	Residential led	0	0	0	+/-	-	0	+/-
SW6	Residential led	0	0	0	+/-	-	0	+/-
SW7	Residential led	0	0	0	+/-	-	0	+/-
SW8	Residential led	-	-	-	+/-	-	0	+/-
T1	Non-residential	0	-	0	+/-	-	-	+/-
T2	Residential led	0	0	-	+/-	0	0	+/-
T3	Residential led	0	0	0	+/-	0	-	+/-
W1	Residential led	0	0	0	+/-	-	0	+/-
W11	Non-residential	0	-	-	+/-	-	--	+/-
W12	Residential led	0	0	0	+/-	-	-	+/-
W13	Non-residential	0	-	0	+/-	-	-	+/-
W14	Non-residential	0	-	0	+/-	-	0	+/-
W3	Residential led	-	-	0	+/-	-	-	+/-
W4	Residential led	0	0	0	+/-	-	0	+/-
W7	Residential led	0	0	0	+/-	-	-	+/-
W8	Residential led	0	0	0	+/-	-	0	+/-

G.7 SA Objective 6: Natural resources

G.7.1 Previously undeveloped land / land with environmental value

G.7.1.1 Medway is primarily built-up in the south of the Plan area, with the urban area containing a wide range of green spaces. Rural areas span the north of the Hoo Peninsula, as well as a small section in the south west of the Plan area.

G.7.1.2 Some 151 sites wholly comprise previously developed land which is likely to have little or no environmental value. The proposed development at these sites is expected to have a minor positive impact on natural resources as development will be classed as an efficient use of land.

G.7.1.3 There are 97 sites which wholly comprise greenfield land and are likely to contain areas of environmental value such as hedgerows, trees and scrub that would be expected to be lost to development. Furthermore, 87 sites are partially previously developed / brownfield sites but also include areas of potential environmental value that could be lost or degraded by the proposed development. The proposed development at these 184 sites is identified to have a minor negative impact on natural resources due to the potential loss of ecologically or environmentally valuable soil resources.

G.7.2 Agricultural Land Classification

G.7.2.1 The land within Medway is predominantly 'urban' and Grade 3 in the south according to the Agricultural Land Classification (ALC), whilst the north contains large areas of Grade 1, 3 and 4 land.

G.7.2.2 13 sites comprise over 20ha and are situated on ALC Grades 1, 2 and 3 land. Grade 1, 2 and potentially Grade 3 represents the best and most versatile (BMV) agricultural land. As these 31 sites comprise previously undeveloped land, or contain areas of potential environmental value, the proposed development at these locations could potentially result in a major negative impact on BMV land due to the loss of this important natural resource. This includes a large proportion of sites in the All Saints, Hoo St Werburgh and High Halstow, and Rainham North wards which lie upon ALC Grade 1.

G.7.2.3 A total of 101 sites are located on ALC Grades 1, 2 and 3 land and comprise less than 20ha. As these sites comprise previously undeveloped land, or contain areas of potential environmental value, the proposed development at these locations could potentially result in a minor negative impact on BMV land.

G.7.2.4 Some 69 sites which are either undeveloped, or contain areas with potential environmental value, are located in areas ALC Grade 4, 5, urban or non-agricultural land. These sites are not located on BMV land and therefore the proposed development at these locations would be likely to result in a minor positive impact in terms of the conservation of agricultural land.

G.7.2.5 A total of 151 sites are wholly previously developed / brownfield and one site (SNF38) is located outside of the ALC zone adjacent to the River Medway. The impact of the proposed development at these 152 sites on BMV land is likely to be negligible.

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G.7.3 Mineral Safeguarding Areas

G.7.3.1 Mineral Safeguarding Areas (MSAs) are located sporadically throughout Medway. These are predominantly sand and gravel resources situated along the River Medway and within rural areas in the north of the Hoo Peninsula. Some 19 sites wholly or partially coincide with MSAs and are therefore identified as having a minor negative impact on mineral resources, due to the potential sterilisation of underlying mineral resources. The majority of these sites are located in the All Saints and Strood Rural wards.

G.7.3.2 The remaining 316 sites do not coincide with MSAs and are therefore expected to result in a negligible impact on mineral resources.

Table G.7.1: *Sites impact matrix for SA Objective 6 – Natural resources*

Site ref.	Site use	Previously undeveloped land	ALC	MSA
AS1	Residential led	-	-	0
AS10	Residential led	-	-	-
AS11	Residential led (mixed-use)	-	-	-
AS14	Residential led	-	-	0
AS15	Residential led	-	-	0
AS16	Residential led (mixed-use)	+	0	-
AS17	Residential led	-	-	-
AS18	Residential led	-	-	0
AS2	Residential led	-	-	0
AS20	Residential led (mixed-use)	-	--	-
AS23	Residential led (park homes)	-	+	0
AS25	Residential led	-	-	0
AS28	Residential led	-	+	0
AS29	Residential led	-	-	0
AS3	Residential led	-	-	0
AS5	Residential led (mixed-use)	-	-	0
AS6	Residential led (mixed-use)	-	-	0
AS7	Non-residential	+	0	0
AS8	Non-residential	-	-	0
AS9	Non-residential	-	--	-
CCB1	Residential led	+	0	0
CCB10	Residential led (mixed-use)	+	0	0
CCB11	Residential led	+	0	0
CCB12	Residential led (mixed-use)	-	+	0
CCB13	Residential led (mixed-use)	+	0	0
CCB15	Residential led (mixed-use)	+	0	0
CCB16	Residential led	-	+	0
CCB17	Residential led (mixed-use)	+	0	0
CCB18	Residential led	-	+	0
CCB19	Residential led (mixed-use)	+	0	0
CCB2	Residential led (mixed-use)	+	0	0
CCB20	Residential led (mixed-use)	+	0	0
CCB21	Residential led (mixed-use)	+	0	0
CCB22	Residential led	+	0	0
CCB23	Residential led (mixed-use)	+	0	0
CCB24	Residential led (mixed-use)	+	0	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
CCB25	Residential-led	+	0	0
CCB26	Residential led (mixed-use)	+	0	0
CCB27	Residential led (mixed-use)	+	0	0
CCB28	Residential led	+	0	0
CCB29	Residential led	-	+	0
CCB3	Residential led (mixed-use)	+	0	0
CCB30	Residential led (mixed-use)	-	+	0
CCB31	Residential led	-	+	0
CCB33	Residential led	+	0	0
CCB34	Residential led (mixed-use)	+	0	0
CCB35	Non-residential	-	+	-
CCB36	Residential led (mixed-use)	+	0	0
CCB37	Residential led (mixed-use)	+	0	0
CCB38	Residential led	+	0	0
CCB39	Residential led	-	+	0
CCB4	Residential led	+	0	0
CCB40	Residential led	-	+	0
CCB41	Residential led	-	+	0
CCB43	Residential led	-	+	0
CCB44	Residential led	+	0	0
CCB46	Residential led	+	0	0
CCB48	Residential led	-	+	0
CCB49	Residential led	+	0	0
CCB5	Non-residential	-	+	0
CCB6	Residential led (mixed-use)	+	0	0
CCB7	Residential led (mixed-use)	-	+	0
CCB8	Residential led	+	0	0
CCB9	Residential led	+	0	0
CHR1	Residential led	+	0	0
CHR10	Residential led	-	-	0
CHR11	Residential led	+	0	0
CHR13	Residential led (Gypsy and Traveller)	-	-	0
CHR14	Residential led (mixed-use)	-	-	0
CHR15	Non-residential	+	0	0
CHR16	Non-residential	-	-	0
CHR17	Non-residential	-	-	0
CHR18	Non-residential	+	0	0
CHR19	Non-residential	+	0	0
CHR2	Non-residential	-	+	0
CHR20	Residential led	-	+	-
CHR21	Non-residential	+	0	0
CHR3	Non-residential	-	-	0
CHR5	Non-residential	-	-	0
CHR6	Residential led	+	0	0
CHR7	Residential led	-	-	0
CHR8	Non-residential	+	0	-
FH1	Non-residential	+	0	0
FP1	Residential led	+	0	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
FP10	Residential led	-	+	0
FP11	Residential led (mixed-use)	+	0	0
FP12	Residential led	+	0	0
FP14	Residential led	+	0	0
FP16	Residential led (mixed-use)	+	0	0
FP17	Residential led	+	0	0
FP18	Residential led	+	0	0
FP19	Residential led	+	0	0
FP2	Residential led	+	0	0
FP22	Residential led	-	+	0
FP23	Residential led	+	0	0
FP25	Residential led (mixed-use)	-	+	0
FP4	Residential led	+	0	0
FP5	Residential led	+	0	0
FP6	Residential led	+	0	0
FP7	Residential led	+	0	0
FP8	Residential led	+	0	0
FP9	Residential led	+	0	0
GN10	Residential led	-	+	0
GN11	Residential led	+	0	0
GN13	Residential led	-	+	0
GN14	Residential led	+	0	0
GN15	Residential led (mixed-use)	+	0	0
GN3	Residential led	+	0	0
GN4	Residential led	+	0	0
GN5	Residential led	-	+	0
GN6	Residential led (mixed-use)	-	+	0
GN8	Residential led	-	+	0
GS1	Residential led	+	0	0
GS10	Residential led (mixed-use)	+	0	0
GS11	Residential led	+	0	0
GS12	Residential led (mixed-use)	+	0	0
GS13	Residential led	+	0	0
GS14	Residential led (mixed-use)	+	0	0
GS18	Residential led (mixed-use)	+	0	0
GS19	Residential led	+	0	0
GS2	Residential led	-	+	0
GS20	Residential led	+	0	0
GS23	Residential led	+	0	0
GS24	Residential led	+	0	0
GS26	Residential led	+	0	0
GS27	Residential led (mixed-use)	+	0	0
GS29	Residential led	+	0	0
GS30	Residential led	+	0	0
GS32	Residential led	-	+	0
GS33	Residential led	-	+	0
GS34	Residential led	+	0	0
GS35	Residential led	+	0	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
GS37	Residential led (mixed-use)	+	0	0
GS4	Residential led	+	0	0
GS5	Residential led	+	0	0
GS6	Residential led	+	0	0
GS7	Residential led (mixed-use)	+	0	0
GS8	Residential led (mixed-use)	-	+	0
HHH1	Non-residential	-	-	0
HHH11	Residential led	-	-	0
HHH14	Residential led	-	-	0
HHH15	Residential led	-	-	0
HHH16	Non-residential	-	-	0
HHH17	Residential led	-	-	0
HHH18	Residential led (mixed-use)	-	--	0
HHH19	Non-residential	-	-	0
HHH21	Non-residential	+	0	0
HHH23	Residential led (mixed-use)	-	-	-
HHH24	Residential led	-	-	0
HHH25	Residential led	-	-	0
HHH28	Residential led (mixed-use)	-	-	0
HHH29	Residential led (mixed-use)	-	-	0
HHH30	Residential led (mixed-use)	-	-	0
HHH32	Residential led	-	-	0
HHH33	Residential led	-	--	0
HHH37	Non-residential	-	-	0
HHH38	Non-residential	-	+	0
HHH39	Non-residential	-	+	0
HHH4	Residential led	-	-	0
HHH40	Residential led	-	-	0
HHH41	Residential led	-	-	0
HHH5	Residential led	-	-	0
HHH7	Residential led	-	--	0
HHH8	Residential led (mixed-use)	-	--	0
HHH9	Residential led	-	-	0
HW11	Residential led	-	-	0
HW3	Residential and secondary school	-	--	0
HW5	Non-residential	+	0	0
HW6	Residential led	-	-	0
HW7	Residential or non-residential	-	-	0
HW8	Residential led	-	+	0
L11	Residential led	-	+	0
L12	Residential led	-	+	0
L2	Residential led	-	+	0
L3	Residential led	+	0	0
L7	Residential led	+	0	0
L9	Residential led	+	0	0
LW10	Residential led	-	-	0
LW2	Residential led	-	+	0
LW3	Residential led	-	+	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
LW4	Residential led	-	--	0
LW5	Residential led (C2 use)	+	0	0
LW7	Residential led	-	--	0
PP1	Residential led	-	-	0
REWW3	Residential led	+	0	0
RN1	Residential led	-	-	0
RN10	Residential led	-	-	0
RN11	Residential led	-	+	0
RN12	Non-residential	-	+	0
RN14	Residential led	-	-	0
RN16	Residential led	-	-	0
RN17	Residential led	-	-	0
RN18	Residential led	+	0	0
RN19	Residential led	-	-	0
RN2	Residential led (mixed-use)	-	-	0
RN22	Residential led	-	-	0
RN23	Residential led	-	-	0
RN24	Residential led	+	0	0
RN25	Residential led	-	-	0
RN26	Residential led (mixed-use)	-	+	0
RN27	Residential led	-	-	0
RN28	Residential led	-	-	0
RN29	Residential led	+	0	0
RN3	Residential led	+	0	0
RN30	Residential led	-	-	0
RN31	Residential led	-	-	0
RN32	Residential led	-	-	0
RN33	Non-residential	-	-	0
RN34	Residential led	-	-	0
RN4	Residential led (mixed-use)	-	-	0
RN5	Residential led (mixed-use)	-	--	0
RSE1	Non-residential	-	-	0
RSE11	Non-residential	+	0	0
RSE4	Residential led	-	-	0
RSE8	Residential led (mixed-use)	-	-	0
RSE9	Residential led	-	-	0
RWB1	Residential led	-	+	0
RWB10	Non-residential	+	0	0
RWB11	Residential led	+	0	0
RWB12	Residential led	+	0	0
RWB14	Residential led	+	0	0
RWB15	Residential led	+	0	0
RWB17	Residential led	+	0	0
RWB18	Residential led	+	0	0
RWB19	Residential led (mixed-use)	+	0	0
RWB2	Residential led	-	+	0
RWB20	Residential led	+	0	0
RWB21	Residential led	+	0	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
RWB23	Non-residential	-	+	0
RWB25	Residential led	+	0	0
RWB3	Residential led	-	+	0
RWB4	Residential led	-	+	0
RWB5	Non-residential	-	-	0
RWB6	Residential led	-	+	0
RWB8	Residential led (mixed-use)	+	0	0
RWB9	Residential led (mixed-use)	+	0	0
SMI1	Residential led	+	0	0
SMI2	Non-residential	+	0	0
SNF1	Residential led	-	-	0
SNF10	Residential led (mixed-use)	+	0	0
SNF12	Residential led	-	+	0
SNF13	Residential led (mixed-use)	+	0	0
SNF15	Residential led (mixed-use)	+	0	0
SNF16	Residential led (mixed-use)	+	0	0
SNF17	Residential led	+	0	0
SNF18	Residential led (mixed-use)	+	0	0
SNF19	Non-residential	+	0	0
SNF2	Residential led (mixed-use)	-	-	0
SNF20	Residential led	+	0	0
SNF21	Residential led (mixed-use)	+	0	0
SNF22	Residential led (mixed-use)	+	0	0
SNF23	Residential led (mixed-use)	+	0	0
SNF24	Residential led (mixed-use)	+	0	0
SNF25	Non-residential	+	0	0
SNF26	Non-residential	-	+	0
SNF27	Residential led	-	+	0
SNF28	Non-residential	+	0	0
SNF30	Residential led (mixed-use)	+	0	0
SNF31	Residential led (mixed-use)	+	0	-
SNF32	Residential led	-	+	0
SNF33	Non-residential	+	0	0
SNF34	Residential led (mixed-use)	+	0	0
SNF35	Residential led (mixed-use)	+	0	0
SNF36	Residential led (mixed-use)	-	+	0
SNF37	Residential led (mixed-use)	-	+	0
SNF38	Residential led	-	0	0
SNF39	Residential led	-	+	0
SNF41	Residential led (mixed-use)	+	0	0
SNF43	Residential led	-	+	0
SNF44	Residential led	+	0	0
SNF5	Residential led	-	+	0
SNF6	Residential led	-	+	0
SNF8	Residential led (mixed-use)	+	0	0
SNF9	Residential led (mixed-use)	-	+	0
SR1	Residential led	-	-	0
SR10	Residential led	-	-	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
SR13	Residential led	-	-	0
SR14	Residential led	-	-	0
SR15	Residential led	-	-	0
SR16	Residential led	-	-	0
SR18	Residential led (mixed-use)	-	-	0
SR2	Non-residential	-	--	0
SR21	Residential led	-	-	0
SR22	Residential led	-	-	0
SR24	Residential led	-	-	0
SR25	Residential led	-	-	0
SR27	Residential led	-	-	0
SR29	Non-residential	-	+	-
SR3	Residential led	-	-	0
SR30	Residential led (mixed-use)	+	0	0
SR31	Residential led (mixed-use)	+	0	0
SR32	Residential led (mixed-use)	-	-	0
SR33	Non-residential	+	0	-
SR34	Residential led	+	0	-
SR35	Non-residential	+	0	-
SR36	Residential led (mixed-use)	+	0	-
SR37	Residential led (mixed-use)	+	0	-
SR38	Residential led (mixed-use)	+	0	-
SR39	Residential led (mixed-use)	-	-	0
SR4	Residential led	-	-	0
SR40	Residential led (mixed-use)	+	0	-
SR41	Residential led (mixed-use)	-	-	0
SR42	Residential led	-	-	0
SR43	Residential led	-	-	0
SR45	Non-residential	-	-	0
SR46	Residential led	-	-	0
SR47	Residential led	-	-	0
SR48	Residential led	+	0	0
SR49	Residential led	-	-	0
SR5	Residential led	-	-	0
SR50	Residential led	+	0	0
SR51	Residential led (mixed-use)	-	--	0
SR52	Residential led (mixed-use)	-	--	0
SR6	Residential led (mixed-use)	-	-	0
SR7	Residential led	-	-	0
SR8	Residential led	-	-	0
SW1	Residential led	+	0	0
SW2	Residential led	-	+	0
SW3	Residential led	+	0	0
SW5	Residential led	+	0	0
SW6	Residential led	-	+	0
SW7	Residential led	-	+	0
SW8	Residential led	-	+	0
T1	Non-residential	-	+	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
T2	Residential led	-	-	0
T3	Residential led	-	+	0
W1	Residential led	-	+	0
W11	Non-residential	-	+	0
W12	Residential led	+	0	0
W13	Non-residential	-	-	0
W14	Non-residential	+	0	0
W3	Residential led	+	0	0
W4	Residential led	+	0	0
W7	Residential led	-	+	0
W8	Residential led	-	+	0

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G.8 SA Objective 7: Housing

G.8.1 Housing provision

G.8.1.1 Residential-led development is likely to result in a net gain in housing. The sites proposed solely for residential use would therefore be expected to result in positive impacts under this objective. Some 87 sites are proposed for mixed-use development including residential.

G.8.1.2 Of the 288 sites proposed for residential-led use, 58 sites have an identified capacity of 100 or more dwellings and will be expected to make a significant contribution towards meeting housing needs, as such a major positive impact on housing would be expected.

G.8.1.3 Some 228 residential-led sites are likely to result in a minor positive impact as they propose a capacity of 99 dwellings or less. This includes Site CHR13 which is proposed for Gypsy and Traveller pitches, Site AS23 which is proposed for the development of park homes, and Site LW5 which is proposed for C2 residential use; development at these three sites would help to meet the varying accommodation needs of Medway's population.

G.8.1.4 Employment-led sites will not be expected to result in a net change in housing provision and therefore a negligible impact is identified.

G.8.1.5 Site SNF39 is proposed for 101 dwellings, however the site comprises an existing housing estate. The housing capacity proposed for Site HHH18 is unknown at the time of writing. The proposed use at Site HW7 is uncertain, being either residential or non-residential. It is therefore uncertain whether the proposed development or redevelopment at these three sites would result in a net change in housing provision.

Table G.8.1: *Sites impact matrix for SA Objective 7 – Housing*

Site ref.	Site use	Housing provision
AS1	Residential led	+
AS10	Residential led	+
AS11	Residential led (mixed-use)	+
AS14	Residential led	+
AS15	Residential led	+
AS16	Residential led (mixed-use)	+
AS17	Residential led	++
AS18	Residential led	+
AS2	Residential led	+
AS20	Residential led (mixed-use)	++
AS23	Residential led (park homes)	+
AS25	Residential led	+
AS28	Residential led	+
AS29	Residential led	+
AS3	Residential led	+
AS5	Residential led (mixed-use)	+
AS6	Residential led (mixed-use)	+
AS7	Non-residential	0
AS8	Non-residential	0
AS9	Non-residential	0

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Site ref.	Site use	Housing provision
CCB1	Residential led	+
CCB10	Residential led (mixed-use)	+
CCB11	Residential led	+
CCB12	Residential led (mixed-use)	+
CCB13	Residential led (mixed-use)	++
CCB15	Residential led (mixed-use)	+
CCB16	Residential led	+
CCB17	Residential led (mixed-use)	+
CCB18	Residential led	++
CCB19	Residential led (mixed-use)	+
CCB2	Residential led (mixed-use)	+
CCB20	Residential led (mixed-use)	+
CCB21	Residential led (mixed-use)	+
CCB22	Residential led	+
CCB23	Residential led (mixed-use)	+
CCB24	Residential led (mixed-use)	+
CCB25	Residential led	++
CCB26	Residential led (mixed-use)	+
CCB27	Residential led (mixed-use)	+
CCB28	Residential led	+
CCB29	Residential led	+
CCB3	Residential led (mixed-use)	+
CCB30	Residential led (mixed-use)	+
CCB31	Residential led	++
CCB33	Residential led	+
CCB34	Residential led (mixed-use)	+
CCB35	Non-residential	0
CCB36	Residential led (mixed-use)	+
CCB37	Residential led (mixed-use)	++
CCB38	Residential led	+
CCB39	Residential led	+
CCB4	Residential led	+
CCB40	Residential led	+
CCB41	Residential led	+
CCB43	Residential led	+
CCB44	Residential led	+
CCB46	Residential led	+
CCB48	Residential led	+
CCB49	Residential led	++
CCB5	Non-residential	0
CCB6	Residential led (mixed-use)	+
CCB7	Residential led (mixed-use)	+
CCB8	Residential led	++
CCB9	Residential led	+
CHR1	Residential led	+
CHR10	Residential led	+
CHR11	Residential led	+
CHR13	Residential led (Gypsy and Traveller)	+
CHR14	Residential led (mixed-use)	+

Site ref.	Site use	Housing provision
CHR15	Non-residential	0
CHR16	Non-residential	0
CHR17	Non-residential	0
CHR18	Non-residential	0
CHR19	Non-residential	0
CHR2	Non-residential	0
CHR20	Residential led	++
CHR21	Non-residential	0
CHR3	Non-residential	0
CHR5	Non-residential	0
CHR6	Residential led	+
CHR7	Residential led	++
CHR8	Non-residential	0
FH1	Non-residential	0
FP1	Residential led	++
FP10	Residential led	++
FP11	Residential led (mixed-use)	++
FP12	Residential led	+
FP14	Residential led	+
FP16	Residential led (mixed-use)	+
FP17	Residential led	+
FP18	Residential led	+
FP19	Residential led	++
FP2	Residential led	+
FP22	Residential led	+
FP23	Residential led	+
FP25	Residential led (mixed-use)	++
FP4	Residential led	+
FP5	Residential led	+
FP6	Residential led	++
FP7	Residential led	+
FP8	Residential led	+
FP9	Residential led	+
GN10	Residential led	+
GN11	Residential led	+
GN13	Residential led	+
GN14	Residential led	+
GN15	Residential led (mixed-use)	++
GN3	Residential led	++
GN4	Residential led	+
GN5	Residential led	+
GN6	Residential led (mixed-use)	++
GN8	Residential led	+
GS1	Residential led	+
GS10	Residential led (mixed-use)	+
GS11	Residential led	+
GS12	Residential led (mixed-use)	+
GS13	Residential led	+
GS14	Residential led (mixed-use)	+

Site ref.	Site use	Housing provision
GS18	Residential led (mixed-use)	+
GS19	Residential led	+
GS2	Residential led	+
GS20	Residential led	+
GS23	Residential led	+
GS24	Residential led	+
GS26	Residential led	+
GS27	Residential led (mixed-use)	+
GS29	Residential led	+
GS30	Residential led	+
GS32	Residential led	+
GS33	Residential led	+
GS34	Residential led	+
GS35	Residential led	+
GS37	Residential led (mixed-use)	++
GS4	Residential led	+
GS5	Residential led	+
GS6	Residential led	+
GS7	Residential led (mixed-use)	+
GS8	Residential led (mixed-use)	+
HHH1	Non-residential	0
HHH11	Residential led	++
HHH14	Residential led	++
HHH15	Residential led	+
HHH16	Non-residential	0
HHH17	Residential led	+
HHH18	Residential led (mixed-use)	+/-
HHH19	Non-residential	0
HHH21	Non-residential	0
HHH23	Residential led (mixed-use)	+
HHH24	Residential led	++
HHH25	Residential led	+
HHH28	Residential led (mixed-use)	+
HHH29	Residential led (mixed-use)	+
HHH30	Residential led (mixed-use)	+
HHH32	Residential led	+
HHH33	Residential led	++
HHH37	Non-residential	0
HHH38	Non-residential	0
HHH39	Non-residential	0
HHH4	Residential led	+
HHH40	Residential led	+
HHH41	Residential led	+
HHH5	Residential led	+
HHH7	Residential led	++
HHH8	Residential led (mixed-use)	++
HHH9	Residential led	+
HW11	Residential led	+
HW3	Residential and secondary school	+

Site ref.	Site use	Housing provision
HW5	Non-residential	0
HW6	Residential led	+
HW7	Residential or non-residential	+/-
HW8	Residential led	+
L11	Residential led	+
L12	Residential led	+
L2	Residential led	+
L3	Residential led	+
L7	Residential led	+
L9	Residential led	+
LW10	Residential led	+
LW2	Residential led	+
LW3	Residential led	+
LW4	Residential led	++
LW5	Residential led (C2 use)	+
LW7	Residential led	++
PP1	Residential led	+
REWW3	Residential led	+
RN1	Residential led	++
RN10	Residential led	+
RN11	Residential led	+
RN12	Non-residential	0
RN14	Residential led	+
RN16	Residential led	+
RN17	Residential led	+
RN18	Residential led	+
RN19	Residential led	+
RN2	Residential led (mixed-use)	++
RN22	Residential led	+
RN23	Residential led	+
RN24	Residential led	+
RN25	Residential led	+
RN26	Residential led (mixed-use)	+
RN27	Residential led	++
RN28	Residential led	+
RN29	Residential led	+
RN3	Residential led	+
RN30	Residential led	+
RN31	Residential led	+
RN32	Residential led	+
RN33	Non-residential	0
RN34	Residential led	+
RN4	Residential led (mixed-use)	++
RN5	Residential led (mixed-use)	++
RSE1	Non-residential (road spur and open space)	0
RSE11	Non-residential	0
RSE4	Residential led	+
RSE8	Residential led (mixed-use)	+
RSE9	Residential led	+

Site ref.	Site use	Housing provision
RWB1	Residential led	+
RWB10	Non-residential	0
RWB11	Residential led	+
RWB12	Residential led	+
RWB14	Residential led	+
RWB15	Residential led	+
RWB17	Residential led	+
RWB18	Residential led	+
RWB19	Residential led (mixed-use)	++
RWB2	Residential led	+
RWB20	Residential led	+
RWB21	Residential led	+
RWB23	Non-residential	0
RWB25	Residential led	++
RWB3	Residential led	+
RWB4	Residential led	+
RWB5	Non-residential	0
RWB6	Residential led	+
RWB8	Residential led (mixed-use)	+
RWB9	Residential led (mixed-use)	+
SMI1	Residential led	++
SMI2	Non-residential	0
SNF1	Residential led	++
SNF10	Residential led (mixed-use)	+
SNF12	Residential led	+
SNF13	Residential led (mixed-use)	++
SNF15	Residential led (mixed-use)	++
SNF16	Residential led (mixed-use)	+
SNF17	Residential led	+
SNF18	Residential led (mixed-use)	+
SNF19	Non-residential	0
SNF2	Residential led (mixed-use)	+
SNF20	Residential led	+
SNF21	Residential led (mixed-use)	+
SNF22	Residential led (mixed-use)	+
SNF23	Residential led (mixed-use)	+
SNF24	Residential led (mixed-use)	+
SNF25	Non-residential	0
SNF26	Non-residential	0
SNF27	Residential led	+
SNF28	Non-residential	0
SNF30	Residential led (mixed-use)	+
SNF31	Residential led (mixed-use)	+
SNF32	Residential led	+
SNF33	Non-residential	0
SNF34	Residential led (mixed-use)	+
SNF35	Residential led (mixed-use)	++
SNF36	Residential led (mixed-use)	+
SNF37	Residential led (mixed-use)	+

Site ref.	Site use	Housing provision
SNF38	Residential led	+
SNF39	Residential led	+/-
SNF41	Residential led (mixed-use)	++
SNF43	Residential led	++
SNF44	Residential led	+
SNF5	Residential led	+
SNF6	Residential led	+
SNF8	Residential led (mixed-use)	+
SNF9	Residential led (mixed-use)	+
SR1	Residential led	+
SR10	Residential led	+
SR13	Residential led	+
SR14	Residential led	+
SR15	Residential led	+
SR16	Residential led	++
SR18	Residential led (mixed-use)	+
SR2	Non-residential	0
SR21	Residential led	+
SR22	Residential led	+
SR24	Residential led	+
SR25	Residential led (mixed-use)	++
SR27	Residential led	+
SR29	Non-residential	0
SR3	Residential led	+
SR30	Residential led (mixed-use)	++
SR31	Residential led (mixed-use)	++
SR32	Residential led (mixed-use)	+
SR33	Non-residential	0
SR34	Residential led	+
SR35	Non-residential	0
SR36	Residential led (mixed-use)	++
SR37	Residential led (mixed-use)	++
SR38	Residential led (mixed-use)	++
SR39	Residential led (mixed-use)	++
SR4	Residential led	++
SR40	Residential led (mixed-use)	++
SR41	Residential led (mixed-use)	+
SR42	Residential led	+
SR43	Residential led	+
SR45	Non-residential	0
SR46	Residential led	+
SR47	Residential led	+
SR48	Residential led	+
SR49	Residential led	+
SR5	Residential led	++
SR50	Residential led	+
SR51	Residential led (mixed-use)	++
SR52	Residential led (mixed-use)	++
SR6	Residential led (mixed-use)	++

Site ref.	Site use	Housing provision
SR7	Residential led	+
SR8	Residential led	+
SW1	Residential led	+
SW2	Residential led	++
SW3	Residential led	+
SW5	Residential led	+
SW6	Residential led	+
SW7	Residential led	+
SW8	Residential led	+
T1	Non-residential	0
T2	Residential led	+
T3	Residential led	+
W1	Residential led	+
W11	Non-residential	0
W12	Residential led	+
W13	Non-residential	0
W14	Non-residential	0
W3	Residential led	+
W4	Residential led	+
W7	Residential led	+
W8	Residential led	+

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G.9 SA Objective 8: Health and wellbeing

G.9.1 Access to NHS hospital with A&E department

G.9.1.1 Medway Maritime Hospital is the only NHS with an Accident & Emergency department within the Plan area. Some 222 reasonable alternative sites are located within 5km of the Medway Maritime Hospital, and as such the proposed development at these sites would be likely to have a minor positive impact on access to emergency healthcare due being within a sustainable distance to these services.

G.9.1.2 The remaining 112 sites are located over 5km from the hospital. These sites are primarily situated in the north, south west and south east of Medway. The proposed development at these sites may therefore have more limited sustainable access to emergency healthcare, with a potential minor negative impact on health.

G.9.1.3 Site RSE1 is proposed for a road spur and open space, and as such has not been assessed against access to healthcare.

G.9.2 Access to GP Surgery

G.9.2.1 There are 58 GP surgeries in Medway serving the existing local communities, particularly within the urban area in the south of Medway. Larger sites are the most impacted due to a greater proportion of land within these sites lying outside of the 800m sustainable target distance.

G.9.2.2 Some 211 sites are located within 800m of a GP surgery. These are primarily located in built-up areas, as well as some rural settlements. The proposed development at these sites will be likely to result in a minor positive impact on sustainable access to GP surgeries.

G.9.2.3 On the other hand, 123 sites are located over 800m from a GP surgery. The majority of these sites fall amongst rural wards including All Saints, Hoo St Werburgh and High Halstow, Hempstead and Strood Rural. For instance, Site HHH4 is located over 2.2km away from the nearest GP surgery, Elms Medical Practice. The proposed development at these 143 sites will be likely to result in a minor negative impact on access to GP surgeries.

G.9.2.4 Site RSE1 is proposed for a road spur and open space, and as such has not been assessed against access to healthcare.

G.9.3 Access to leisure facilities

G.9.3.1 There are five leisure centres in Medway, all located within the central portion of the Plan area. These include ‘Hoo Sports Centre’, ‘Cozenton Park Sports Centre’, ‘Strood Sports Centre’, ‘Medway Park Sports Centre’ and ‘The Strand Leisure Park’. Some 192 sites are located outside of the 1.5km sustainable target distance to a leisure centre and therefore, the proposed development at these sites could potentially have a minor negative impact on access to leisure facilities. These sites are primarily located in rural wards, although Rochester West and Borstal, Fort Pitt, and Lordswood and Walderslade are also affected.

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G.9.3.2 The remaining 142 sites are located within 1.5km of a leisure centre and therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to leisure facilities. These sites are primarily located in urban areas.

G.9.3.3 Site RSE1 is proposed for a road spur and open space, and as such has not been assessed against access to leisure facilities.

G.9.4 Access to public greenspace

G.9.4.1 Greenspaces are distributed throughout Medway, including parks, allotments, playing fields, Cliffe Pools in the north east and the Ranscombe Farm Country Park in the south east. The majority of sites (302) are located within 600m of one or more of these greenspaces, and therefore the proposed development at these sites would be likely to result in a minor positive impact on access to greenspace.

G.9.4.2 The remaining 32 sites are located over 600m from public greenspace. The Hoo St Werburgh and High Halstow ward has the poorest greenspace provision, with a total of 15 sites affected. The proposed development at these 41 sites could potentially lead to a minor negative impact on access to greenspace.

G.9.4.3 Site RSE1 is proposed for a road spur and open space, and as such has not been assessed against access to public greenspace.

G.9.5 Net loss of public greenspace

G.9.5.1 Some 16 reasonable alternative sites coincide wholly or partially with public greenspaces, including Sites CCB29 and CCB40 which both coincide with natural greenspace. The proposed development at these 18 sites could potentially result in the net loss of greenspace, therefore having a minor negative impact on the provision of greenspace across Medway.

G.9.6 Access to Public Rights of Way / cycle paths

G.9.6.1 The majority of sites (321) are located within 600m of the PRoW or cycle network. The proposed development at these sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents. However, the remaining 13 sites are located wholly or partially over 600m from the PRoW or cycle network; therefore, the proposed development at these sites could potentially have a minor negative impact on pedestrian and cycle access.

G.9.6.2 Site RSE1 is proposed for a road spur and open space, and as such has not been assessed against access to PRoW/cycle routes.

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Table G.9.1: *Sites impact matrix for SA Objective 8 – Health and wellbeing*

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
AS1	Residential led	-	-	-	-	0	+
AS10	Residential led	-	-	-	+	0	+
AS11	Residential led (mixed-use)	-	-	-	+	0	+
AS14	Residential led	-	+	-	+	0	+
AS15	Residential led	-	+	-	+	0	+
AS16	Residential led (mixed-use)	-	+	-	+	0	+
AS17	Residential led	-	+	-	+	0	+
AS18	Residential led	-	-	-	+	0	+
AS2	Residential led	-	-	-	-	0	+
AS20	Residential led (mixed-use)	-	-	-	+	0	+
AS23	Residential led (park homes)	-	-	-	+	0	+
AS25	Residential led	-	-	-	+	0	+
AS28	Residential led	-	-	-	+	0	+
AS29	Residential led	-	+	-	+	0	-
AS3	Residential led	-	-	-	-	0	+
AS5	Residential led (mixed-use)	-	-	-	-	0	+
AS6	Residential led (mixed-use)	-	-	-	-	0	+
AS7	Non-residential	-	-	-	-	0	+
AS8	Non-residential	-	-	-	-	0	+
AS9	Non-residential	-	-	-	-	0	+
CCB1	Residential led	+	+	-	+	0	+
CCB10	Residential led (mixed-use)	+	+	-	+	0	+
CCB11	Residential led	+	+	+	+	0	+
CCB12	Residential led (mixed-use)	+	+	-	+	0	+
CCB13	Residential led (mixed-use)	+	+	+	+	0	+
CCB15	Residential led (mixed-use)	+	+	+	+	0	+
CCB16	Residential led	+	+	+	+	0	+
CCB17	Residential led (mixed-use)	+	+	+	+	0	+
CCB18	Residential led	+	+	+	+	0	+
CCB19	Residential led (mixed-use)	+	+	+	+	0	+
CCB2	Residential led (mixed-use)	+	+	-	+	0	+
CCB20	Residential led (mixed-use)	+	+	+	+	0	+
CCB21	Residential led (mixed-use)	+	+	+	+	0	+
CCB22	Residential led	+	+	+	+	0	+
CCB23	Residential led (mixed-use)	+	+	+	+	0	+
CCB24	Residential led (mixed-use)	+	+	+	+	0	+
CCB25	Residential led	+	-	+	+	0	+
CCB26	Residential led (mixed-use)	+	+	+	+	0	+
CCB27	Residential led (mixed-use)	+	+	+	+	0	+
CCB28	Residential led	+	+	-	+	0	+
CCB29	Residential led	+	+	+	+	-	+
CCB3	Residential led (mixed-use)	+	+	-	+	0	+
CCB30	Residential led (mixed-use)	+	+	+	+	0	+
CCB31	Residential led	+	+	+	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
CCB33	Residential led	+	+	+	+	0	+
CCB34	Residential led (mixed-use)	+	+	+	+	0	+
CCB35	Non-residential	+	+	+	+	0	+
CCB36	Residential led (mixed-use)	+	+	+	+	0	+
CCB37	Residential led (mixed-use)	+	+	+	+	0	+
CCB38	Residential led	+	+	+	+	0	+
CCB39	Residential led	+	+	+	+	0	+
CCB4	Residential led	+	+	-	+	0	+
CCB40	Residential led	+	+	+	+	-	+
CCB41	Residential led	+	+	-	+	0	+
CCB43	Residential led	+	-	+	+	0	+
CCB44	Residential led	+	+	+	+	0	+
CCB46	Residential led	+	+	+	+	0	+
CCB48	Residential led	+	+	+	+	0	+
CCB49	Residential led	+	+	-	+	0	+
CCB5	Non-residential	+	+	+	+	-	+
CCB6	Residential led (mixed-use)	+	+	-	+	0	+
CCB7	Residential led (mixed-use)	+	+	+	+	0	+
CCB8	Residential led	+	+	+	+	0	+
CCB9	Residential led	+	+	-	+	0	+
CHR1	Residential led	-	-	-	+	0	+
CHR10	Residential led	-	+	-	+	0	+
CHR11	Residential led	-	+	-	+	0	+
CHR13	Residential led (Gypsy and Traveller)	-	-	-	+	0	+
CHR14	Residential led (mixed-use)	-	-	-	+	0	+
CHR15	Non-residential	-	-	-	+	0	+
CHR16	Non-residential	-	-	-	+	0	+
CHR17	Non-residential	-	+	-	+	0	+
CHR18	Non-residential	-	-	+	+	0	+
CHR19	Non-residential	+	+	+	+	0	+
CHR2	Non-residential	-	-	-	+	0	+
CHR20	Residential led	+	-	+	+	0	+
CHR21	Non-residential	+	+	+	+	0	+
CHR3	Non-residential	-	-	-	-	0	+
CHR5	Non-residential	-	+	-	+	0	+
CHR6	Residential led	-	-	-	+	0	+
CHR7	Residential led	-	-	-	+	0	+
CHR8	Non-residential	-	-	-	+	0	+
FH1	Non-residential	+	+	-	+	0	+
FP1	Residential led	+	+	-	+	0	+
FP10	Residential led	+	+	-	+	0	+
FP11	Residential led (mixed-use)	+	+	-	+	0	+
FP12	Residential led	+	+	-	+	0	+
FP14	Residential led	+	+	-	+	0	+
FP16	Residential led (mixed-use)	+	+	-	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
FP17	Residential led	+	+	-	+	0	+
FP18	Residential led	+	+	-	+	0	+
FP19	Residential led	+	+	-	+	0	+
FP2	Residential led	+	+	-	+	0	+
FP22	Residential led	+	+	-	+	0	+
FP23	Residential led	+	+	+	+	0	+
FP25	Residential led (mixed-use)	+	+	-	+	0	+
FP4	Residential led	+	+	-	+	0	+
FP5	Residential led	+	+	-	+	0	+
FP6	Residential led	+	+	-	+	0	+
FP7	Residential led	+	+	-	+	0	+
FP8	Residential led	+	+	-	+	0	+
FP9	Residential led	+	+	-	+	0	+
GN10	Residential led	+	-	+	+	0	+
GN11	Residential led	+	-	+	+	0	+
GN13	Residential led	+	-	+	+	0	+
GN14	Residential led	+	+	+	+	0	+
GN15	Residential led (mixed-use)	+	+	+	+	-	+
GN3	Residential led	+	+	+	+	0	+
GN4	Residential led	+	+	+	+	0	+
GN5	Residential led	+	+	+	+	0	+
GN6	Residential led (mixed-use)	+	+	+	+	0	+
GN8	Residential led	+	-	+	+	0	+
GS1	Residential led	+	+	+	+	0	+
GS10	Residential led (mixed-use)	+	+	+	+	0	+
GS11	Residential led	+	+	+	+	0	+
GS12	Residential led (mixed-use)	+	+	+	+	0	+
GS13	Residential led	+	+	+	+	0	+
GS14	Residential led (mixed-use)	+	+	+	+	0	+
GS18	Residential led (mixed-use)	+	+	+	+	0	+
GS19	Residential led	+	+	+	+	0	+
GS2	Residential led	+	+	+	+	0	+
GS20	Residential led	+	+	+	+	0	+
GS23	Residential led	+	+	+	+	0	+
GS24	Residential led	+	+	+	+	-	+
GS26	Residential led	+	+	+	+	0	+
GS27	Residential led (mixed-use)	+	+	+	+	0	+
GS29	Residential led	+	+	+	+	0	+
GS30	Residential led	+	+	+	+	0	+
GS32	Residential led	+	+	+	+	0	+
GS33	Residential led	+	+	-	+	0	+
GS34	Residential led	+	+	+	+	0	+
GS35	Residential led	+	+	-	+	0	+
GS37	Residential led (mixed-use)	+	+	+	+	0	+
GS4	Residential led	+	+	+	+	0	+
GS5	Residential led	+	+	+	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
GS6	Residential led	+	+	+	+	0	+
GS7	Residential led (mixed-use)	+	+	+	+	0	+
GS8	Residential led (mixed-use)	+	+	+	+	0	+
HHH1	Non-residential	-	-	-	+	0	+
HHH11	Residential led	-	-	+	+	0	+
HHH14	Residential led	-	-	+	+	0	+
HHH15	Residential led	-	-	-	+	0	+
HHH16	Non-residential	-	-	+	+	0	-
HHH17	Residential led	-	-	+	+	0	-
HHH18	Residential led (mixed-use)	-	-	-	+	0	+
HHH19	Non-residential	-	-	-	+	0	+
HHH21	Non-residential	-	-	-	+	0	+
HHH23	Residential led (mixed-use)	-	-	-	+	0	+
HHH24	Residential led	-	+	-	-	0	+
HHH25	Residential led	-	+	-	-	0	+
HHH28	Residential led (mixed-use)	-	-	-	-	0	+
HHH29	Residential led (mixed-use)	-	-	-	-	0	+
HHH30	Residential led (mixed-use)	-	-	-	-	0	+
HHH32	Residential led	-	-	-	-	0	+
HHH33	Residential led	-	-	-	-	0	+
HHH37	Non-residential	-	-	-	-	0	+
HHH38	Non-residential	-	-	-	-	0	-
HHH39	Non-residential	-	-	-	-	0	+
HHH4	Residential led	-	-	+	+	0	+
HHH40	Residential led	-	-	-	+	0	+
HHH41	Residential led	-	-	+	+	0	+
HHH5	Residential led	-	-	-	+	0	+
HHH7	Residential led	-	-	+	+	-	-
HHH8	Residential led (mixed-use)	-	-	+	+	0	+
HHH9	Residential led	-	-	+	+	0	+
HW11	Residential led	+	-	-	+	0	+
HW3	Residential and secondary school	+	-	-	+	0	+
HW5	Non-residential	+	-	-	+	0	+
HW6	Residential led	-	-	-	+	0	+
HW7	Residential or non-residential	-	-	-	-	0	+
HW8	Residential led	-	+	-	+	0	+
L11	Residential led	+	+	-	+	0	+
L12	Residential led	+	+	-	+	0	+
L2	Residential led	+	+	-	+	0	+
L3	Residential led	+	+	-	+	0	+
L7	Residential led	+	+	-	+	0	+
L9	Residential led	+	+	-	+	0	+
LW10	Residential led	+	+	-	+	0	+
LW2	Residential led	+	+	-	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
LW3	Residential led	+	+	-	+	0	+
LW4	Residential led	+	-	-	+	0	+
LW5	Residential led (C2 use)	+	+	-	+	0	+
LW7	Residential led	+	-	-	+	0	+
PP1	Residential led	+	+	-	+	0	+
REWW3	Residential led	+	+	-	+	0	+
RN1	Residential led	+	-	+	+	0	+
RN10	Residential led	+	-	+	+	0	+
RN11	Residential led	+	+	+	+	-	+
RN12	Non-residential	+	+	+	+	-	+
RN14	Residential led	+	-	+	+	0	+
RN16	Residential led	+	-	+	+	0	+
RN17	Residential led	+	-	+	+	0	+
RN18	Residential led	-	+	+	+	0	+
RN19	Residential led	+	-	+	+	0	+
RN2	Residential led (mixed-use)	+	-	-	+	0	+
RN22	Residential led	-	-	+	+	0	+
RN23	Residential led	-	-	+	+	0	+
RN24	Residential led	-	+	-	+	0	+
RN25	Residential led	-	-	-	+	0	+
RN26	Residential led (mixed-use)	-	-	-	-	0	+
RN27	Residential led	-	-	-	+	0	+
RN28	Residential led	-	+	-	+	0	+
RN29	Residential led	-	-	-	+	0	+
RN3	Residential led	+	+	+	+	0	+
RN30	Residential led	-	-	-	+	0	+
RN31	Residential led	-	-	-	+	0	+
RN32	Residential led	-	-	+	+	0	+
RN33	Non-residential	-	-	-	+	0	+
RN34	Residential led	+	-	+	+	0	+
RN4	Residential led (mixed-use)	+	-	-	+	0	+
RN5	Residential led (mixed-use)	+	-	-	+	0	+
RSE1	Non-residential (road spur and open space)	0	0	0	0	0	0
RSE11	Non-residential	-	+	-	+	0	+
RSE4	Residential led	-	-	-	+	0	+
RSE8	Residential led (mixed-use)	-	+	-	-	0	+
RSE9	Residential led	-	+	-	+	0	+
RWB1	Residential led	+	+	-	+	0	+
RWB10	Non-residential	+	+	-	+	0	+
RWB11	Residential led	+	+	-	+	0	+
RWB12	Residential led	+	+	-	+	0	+
RWB14	Residential led	+	+	-	+	0	+
RWB15	Residential led	+	+	-	+	0	+
RWB17	Residential led	+	+	-	+	0	+
RWB18	Residential led	+	+	-	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
RWB19	Residential led (mixed-use)	+	+	-	+	0	+
RWB2	Residential led	+	+	-	+	0	+
RWB20	Residential led	+	+	-	+	0	+
RWB21	Residential led	+	+	-	+	0	+
RWB23	Non-residential	+	+	-	+	0	+
RWB25	Residential led	+	+	-	+	0	+
RWB3	Residential led	+	+	-	+	0	+
RWB4	Residential led	+	-	-	+	0	+
RWB5	Non-residential	+	-	-	+	0	+
RWB6	Residential led	+	-	-	+	0	+
RWB8	Residential led (mixed-use)	+	+	-	+	0	+
RWB9	Residential led (mixed-use)	+	+	-	+	0	+
SMI1	Residential led	+	+	+	+	0	+
SMI2	Non-residential	+	+	+	+	-	+
SNF1	Residential led	-	-	+	+	0	+
SNF10	Residential led (mixed-use)	+	+	+	+	0	+
SNF12	Residential led	+	+	+	+	-	+
SNF13	Residential led (mixed-use)	+	+	+	+	0	+
SNF15	Residential led (mixed-use)	+	+	+	+	0	+
SNF16	Residential led (mixed-use)	+	+	+	+	0	+
SNF17	Residential led	+	+	+	+	0	+
SNF18	Residential led (mixed-use)	+	+	+	+	0	+
SNF19	Non-residential	+	+	+	+	0	+
SNF2	Residential led (mixed-use)	-	-	+	-	0	+
SNF20	Residential led	+	+	+	+	0	+
SNF21	Residential led (mixed-use)	+	+	+	+	0	+
SNF22	Residential led (mixed-use)	+	+	+	+	0	+
SNF23	Residential led (mixed-use)	+	+	+	+	0	+
SNF24	Residential led (mixed-use)	+	+	+	+	0	+
SNF25	Non-residential	+	+	+	+	0	+
SNF26	Non-residential	+	+	+	+	0	+
SNF27	Residential led	+	+	+	+	0	+
SNF28	Non-residential	+	+	+	+	-	+
SNF30	Residential led (mixed-use)	+	+	+	+	0	+
SNF31	Residential led (mixed-use)	+	+	+	+	0	+
SNF32	Residential led	+	+	+	+	0	+
SNF33	Non-residential	+	+	+	+	0	+
SNF34	Residential led (mixed-use)	+	+	+	+	0	+
SNF35	Residential led (mixed-use)	+	+	+	+	-	+
SNF36	Residential led (mixed-use)	+	+	+	+	0	+
SNF37	Residential led (mixed-use)	+	+	+	+	0	+
SNF38	Residential led	+	+	+	+	0	+
SNF39	Residential led	+	+	+	+	0	+
SNF41	Residential led (mixed-use)	+	+	+	+	0	+
SNF43	Residential led	+	+	-	+	0	+
SNF44	Residential led	+	+	-	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
SNF5	Residential led	+	+	+	+	0	+
SNF6	Residential led	+	+	+	+	0	+
SNF8	Residential led (mixed-use)	+	+	+	+	0	+
SNF9	Residential led (mixed-use)	+	+	+	+	0	+
SR1	Residential led	-	-	-	-	0	+
SR10	Residential led	-	-	-	-	0	+
SR13	Residential led	+	+	-	+	0	+
SR14	Residential led	-	+	-	+	0	+
SR15	Residential led	+	+	-	+	0	+
SR16	Residential led	-	+	-	+	0	+
SR18	Residential led (mixed-use)	-	+	-	+	0	+
SR2	Non-residential	-	-	-	-	-	+
SR21	Residential led	-	+	-	+	0	+
SR22	Residential led	-	+	-	+	0	+
SR24	Residential led	-	-	-	-	0	+
SR25	Residential led (mixed-use)	+	+	-	+	0	+
SR27	Residential led	+	-	-	+	0	+
SR29	Non-residential	+	-	-	-	0	-
SR3	Residential led	-	-	-	+	0	+
SR30	Residential led (mixed-use)	+	-	-	+	0	+
SR31	Residential led (mixed-use)	+	-	-	-	0	-
SR32	Residential led (mixed-use)	+	-	-	+	0	+
SR33	Non-residential	+	-	-	-	0	+
SR34	Residential led	+	-	-	+	0	+
SR35	Non-residential	+	-	-	-	0	+
SR36	Residential led (mixed-use)	+	-	-	+	0	-
SR37	Residential led (mixed-use)	+	-	-	+	0	-
SR38	Residential led (mixed-use)	+	-	-	+	0	-
SR39	Residential led (mixed-use)	+	-	-	-	0	-
SR4	Residential led	-	+	-	+	0	+
SR40	Residential led (mixed-use)	+	-	-	+	0	-
SR41	Residential led (mixed-use)	-	-	-	+	0	+
SR42	Residential led	-	-	-	+	0	+
SR43	Residential led	-	-	-	+	0	+
SR45	Non-residential	-	-	-	+	0	+
SR46	Residential led	-	-	-	+	0	+
SR47	Residential led	-	-	-	+	0	+
SR48	Residential led	-	-	-	+	0	+
SR49	Residential led	+	-	-	+	0	+
SR5	Residential led	+	-	-	+	0	+
SR50	Residential led	+	-	-	+	-	+
SR51	Residential led (mixed-use)	-	+	-	+	-	+
SR52	Residential led (mixed-use)	-	-	-	+	-	+
SR6	Residential led (mixed-use)	-	-	-	+	0	+
SR7	Residential led	-	+	-	+	0	+
SR8	Residential led	-	-	-	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
SW1	Residential led	-	+	+	+	0	+
SW2	Residential led	-	+	+	+	0	+
SW3	Residential led	-	+	+	+	0	+
SW5	Residential led	-	+	+	+	0	+
SW6	Residential led	+	+	+	+	0	+
SW7	Residential led	-	+	+	+	0	+
SW8	Residential led	+	+	+	+	0	+
T1	Non-residential	+	+	-	+	0	+
T2	Residential led	+	+	-	+	0	+
T3	Residential led	+	+	+	+	0	+
W1	Residential led	+	+	+	+	0	+
W11	Non-residential	+	+	-	+	-	+
W12	Residential led	+	-	-	+	0	+
W13	Non-residential	+	+	-	+	0	+
W14	Non-residential	+	+	+	+	0	+
W3	Residential led	+	+	-	+	0	+
W4	Residential led	+	+	+	+	0	+
W7	Residential led	+	+	-	+	0	-
W8	Residential led	+	+	-	+	0	+

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G.10 SA Objective 9: Cultural heritage

G.10.1 Grade I Listed Buildings

G.10.1.1 There are 49 Grade I Listed Buildings distributed throughout Medway. Site SR25 coincides with the 'Barn 30 yards south west of the manor, Upnor Road', which is on the Heritage at Risk (HAR) register. In line with the precautionary principle, it is considered that development at this site could potentially accelerate damage towards the structure of the medieval barn, which is in 'poor' condition[14]. Site CCB25 lies adjacent to both 'Number 7 Slip Cover' and 'Machine Shop Number 3'. Site CCB35 also lies adjacent to the 'Brunel Saw Mill'. Development at these three sites could potentially have direct impacts through increasing the risk of damage on the structure, setting or character of these Grade I Listed Buildings, and therefore a major negative impact is identified.

G.10.1.2 An additional 12 sites lie in close proximity to Grade I Listed Buildings, where the proposed development at could potentially result in a minor negative impact on the setting of Grade I Listed Buildings.

G.10.1.3 The remaining 320 sites are unlikely to significantly impact any Grade I Listed Building, primarily due to sites being separated from listed buildings by existing built form.

G.10.2 Grade II* Listed Buildings

G.10.2.1 There are 78 Grade II* Listed Buildings distributed throughout Medway. A large proportion of these listed buildings are concentrated within the urban areas of Rochester and Brompton. Site FP7 coincides with '351 High Street' and Site SMI2 coincides with 'Number 8 Machine Shop'. Development in these areas could potentially have direct impacts through increasing the risk of damage on the structure, setting or character of these listed buildings; therefore, a potential major negative impact has been identified for these two sites.

G.10.2.2 Three more sites lie adjacent to Grade II* Listed Buildings. Site CCB1 lies adjacent to the 'Church of St John Divine', Site CCB35 lies adjacent to 'Timber Seasoning Store, North', and Site FP19 lies adjacent to 'St John's Church Chatham'. An additional 15 sites are located in close proximity to Grade II* Listed Buildings. The proposed development at these sites could therefore potentially result in a minor negative impact on the setting of Grade II* Listed Buildings.

G.10.2.3 The remaining 315 sites are unlikely to significantly impact any Grade II* Listed Building, primarily due to sites being separated from listed buildings by existing built form.

G.10.3 Grade II Listed Buildings

G.10.3.1 There are 526 Grade II Listed Buildings distributed throughout Medway; a large proportion of these are concentrated within the urban areas of Rochester and Brompton, with others scattered sporadically through the rest of the Plan area. Nine sites coincide with Grade II

[14] Historic England (2024) Heritage at Risk Register: Barn 30 yards south east of the manor, Upnor Road (south side), Frindsbury Extra - Medway (UA). Available at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/49126 [Date accessed: 25/04/25]

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Listed Buildings. Development in these areas could potentially have direct impacts through increasing the risk of damage on the structure, setting or character of these listed buildings; therefore, a major negative impact has been identified for these nine sites.

G.10.3.2 Some 19 sites lie adjacent to Grade II Listed Buildings, and an additional 49 sites are located in close proximity to Grade II Listed Buildings, all of which have potential to alter the setting of the listed buildings. The proposed development at these 68 sites could therefore potentially result in a minor negative impact on this receptor.

G.10.3.3 The remaining 258 sites are unlikely to significantly impact any Grade II Listed Buildings, primarily due to sites being separated from listed buildings by existing built form.

G.10.4 Conservation Area

G.10.4.1 Medway contains 26 Conservation Areas (CA), the majority of which cover sections of the urban area. There are 38 sites which are located wholly or partially within a CA, including Site CCB40 within 'Brompton Lines' CA, and Site GS30 within 'Railway Street' CA. 'Railway Street' CA is on the HAR register, therefore development at this site has potential to accelerate damage towards the CA which is in 'very bad' condition[15]. A further 10 sites lie adjacent to CAs, whilst an additional 16 sites lie in close proximity. The proposed development at these 64 sites could potentially result in a minor negative impact on the character or setting of these CAs.

G.10.4.2 The remaining 271 sites are not expected to have a significant impact on the setting of any CA, with negligible impacts identified.

G.10.5 Scheduled Monument

G.10.5.1 There are 77 Scheduled Monuments (SM) located in Medway. A large number of these are concentrated within the urban area of Rochester and Brompton, with the rest being scattered throughout the rest of Medway.

G.10.5.2 Four sites coincide with an SM: 'Brook Low Level Pumping Station' SM lies wholly within CCB13; the majority of Site FP6 coincides with 'Fort Pitt' SM; a small portion of Site CCB35 coincides with 'Chatham Dockyard' SM; and a small portion of Site CCB5 coincides with 'Chatham Lines' and 'Brompton Lines' SMs. 'Brompton Lines' is on the HAR register, and therefore development at Site CCB5 has potential to increase the risk of decay which currently threatens this heritage asset[16]. In line with the precautionary principle, it is considered that the proposed development at these four sites could potentially have a direct adverse effect on the structure, setting or character of these SMs, resulting in a major negative impact on cultural heritage.

G.10.5.3 Site SR43 lies adjacent to 'Cooling Castle' SM, which is also on the HAR register and is in 'poor' condition[17]. Development at the site has potential to increase human and

[15] Historic England (2023) Heritage at Risk Register: Railway Street - Medway (UA). Available at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/4704 [Date accessed: 28/03/24]

[16] Historic England (2023) Heritage at Risk Register: Brompton Lines, Chatham - Medway (UA). Available at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/48197 [Date accessed: 28/03/24]

[17] Historic England (2024) Heritage at Risk Register: Cooling Castle, Cooling - Medway (UA). Available at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/46717 [Date accessed: 25/04/25]

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environmental threats to the SM. An additional 23 sites are located in close proximity to SMs. The proposed development at these 24 sites could potentially result in a minor negative impact on the setting of these SMs.

G.10.5.4 All other reasonable alternative sites are not located in close proximity to any SMs, and as such, the proposed development at these sites would not be expected to significantly impact the setting of any of these SMs.

G.10.6 Registered Park and Gardens

G.10.6.1 Three Registered Parks and Gardens (RPGs) can be found within Medway: 'Cobham Hall', 'The Officers' terrace, the Historic Dockyard, Chatham' and 'Jewish Burial Ground, Chatham Memorial Synagogue'. No sites coincide or lie adjacent to an RPG; however, five sites are located in close proximity. These comprise Sites FP4, FP5, FP6, FP7 and FP9, all of which are located less than 100m from the 'Jewish Burial Ground, Chatham Memorial Synagogue' RPG. The proposed development at these sites could potentially result in a minor negative impact on the setting on the RPG.

G.10.6.2 The remaining sites are deemed unlikely to have a significant impact on the setting of any RPG due to the previously developed nature of the sites and/or presence of intervening development. All other sites have therefore scored negligible against RPGs.

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Table G.10.1: *Sites impact matrix for SA Objective 9 – Cultural heritage*

Site ref.	Site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden
AS1	Residential led	0	0	0	0	0	0
AS10	Residential led	0	0	-	0	0	0
AS11	Residential led (mixed-use)	0	0	-	0	0	0
AS14	Residential led	0	0	-	0	0	0
AS15	Residential led	0	0	0	0	0	0
AS16	Residential led (mixed-use)	0	0	--	0	0	0
AS17	Residential led	0	0	-	0	0	0
AS18	Residential led	-	0	-	0	0	0
AS2	Residential led	0	0	-	0	0	0
AS20	Residential led (mixed-use)	-	-	-	0	-	0
AS23	Residential led (park homes)	0	0	0	0	0	0
AS25	Residential led	0	0	0	0	0	0
AS28	Residential led	0	0	0	0	-	0
AS29	Residential led	0	0	0	0	0	0
AS3	Residential led	0	0	0	0	0	0
AS5	Residential led (mixed-use)	0	0	0	0	0	0
AS6	Residential led (mixed-use)	0	0	0	0	0	0
AS7	Non-residential	0	0	0	0	0	0
AS8	Non-residential	0	0	0	0	0	0
AS9	Non-residential	0	0	0	0	0	0
CCB1	Residential led	0	-	0	0	0	0
CCB10	Residential led (mixed-use)	0	-	0	-	0	0
CCB11	Residential led	0	0	0	0	0	0
CCB12	Residential led (mixed-use)	0	0	0	0	0	0
CCB13	Residential led (mixed-use)	0	0	0	0	--	0
CCB15	Residential led (mixed-use)	0	0	0	0	0	0
CCB16	Residential led	0	0	0	-	0	0
CCB17	Residential led (mixed-use)	0	0	0	0	-	0
CCB18	Residential led	0	0	0	-	0	0
CCB19	Residential led (mixed-use)	0	0	0	0	0	0
CCB2	Residential led (mixed-use)	0	0	0	0	0	0
CCB20	Residential led (mixed-use)	0	0	0	0	0	0
CCB21	Residential led (mixed-use)	0	0	-	0	0	0
CCB22	Residential led	0	0	0	0	-	0
CCB23	Residential led (mixed-use)	0	0	0	0	0	0
CCB24	Residential led (mixed-use)	0	0	0	0	0	0
CCB25	Residential led	--	-	-	-	-	0
CCB26	Residential led (mixed-use)	0	0	0	0	0	0
CCB27	Residential led (mixed-use)	0	0	0	0	0	0
CCB28	Residential led	0	0	0	0	0	0
CCB29	Residential led	0	0	-	-	-	0
CCB3	Residential led (mixed-use)	0	0	0	0	0	0
CCB30	Residential led (mixed-use)	0	0	0	0	0	0

Site ref.	Site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden
CCB31	Residential led	0	0	0	-	0	0
CCB33	Residential led	0	0	-	-	0	0
CCB34	Residential led (mixed-use)	0	0	0	0	0	0
CCB35	Non-residential	--	-	--	-	--	0
CCB36	Residential led (mixed-use)	0	0	0	0	0	0
CCB37	Residential led (mixed-use)	0	0	0	-	0	0
CCB38	Residential led	0	0	0	0	0	0
CCB39	Residential led	0	0	0	0	0	0
CCB4	Residential led	0	0	-	-	0	0
CCB40	Residential led	0	0	0	-	0	0
CCB41	Residential led	0	0	0	0	0	0
CCB43	Residential led	0	0	0	-	-	0
CCB44	Residential led	0	0	0	0	0	0
CCB46	Residential led	0	0	0	0	0	0
CCB48	Residential led	0	0	-	-	0	0
CCB49	Residential led	0	0	-	-	0	0
CCB5	Non-residential	0	-	--	-	--	0
CCB6	Residential led (mixed-use)	0	0	0	0	0	0
CCB7	Residential led (mixed-use)	0	0	-	0	0	0
CCB8	Residential led	0	0	0	0	0	0
CCB9	Residential led	0	0	-	-	0	0
CHR1	Residential led	0	0	0	0	0	0
CHR10	Residential led	0	0	0	0	0	0
CHR11	Residential led	0	0	0	0	0	0
CHR13	Residential led (Gypsy and Traveller)	0	0	0	0	0	0
CHR14	Residential led (mixed-use)	0	0	-	0	0	0
CHR15	Non-residential	0	0	0	0	0	0
CHR16	Non-residential	0	0	0	0	0	0
CHR17	Non-residential	0	0	0	0	0	0
CHR18	Non-residential	0	0	0	0	0	0
CHR19	Non-residential	0	0	0	0	0	0
CHR2	Non-residential	0	0	0	0	0	0
CHR20	Residential led	-	0	0	0	-	0
CHR21	Non-residential	-	0	0	0	-	0
CHR3	Non-residential	0	-	-	-	0	0
CHR5	Non-residential	0	0	0	0	0	0
CHR6	Residential led	0	0	0	0	0	0
CHR7	Residential led	0	0	0	0	0	0
CHR8	Non-residential	0	0	0	0	0	0
FH1	Non-residential	0	0	0	0	0	0
FP1	Residential led	0	0	-	-	-	0
FP10	Residential led	0	0	0	-	-	0
FP11	Residential led (mixed-use)	0	0	-	-	0	0
FP12	Residential led	0	0	-	-	-	0
FP14	Residential led	0	0	0	-	0	0

Site ref.	Site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden
FP16	Residential led (mixed-use)	0	0	0	-	0	0
FP17	Residential led	0	0	0	0	0	0
FP18	Residential led	0	0	0	-	0	0
FP19	Residential led	0	-	0	0	0	0
FP2	Residential led	0	0	--	-	0	0
FP22	Residential led	0	0	0	-	0	0
FP23	Residential led	0	0	0	0	0	0
FP25	Residential led (mixed-use)	0	0	0	-	0	0
FP4	Residential led	0	0	-	-	0	-
FP5	Residential led	0	0	-	-	0	-
FP6	Residential led	0	0	0	-	--	-
FP7	Residential led	0	--	--	-	0	-
FP8	Residential led	0	0	0	0	0	0
FP9	Residential led	0	-	--	-	0	-
GN10	Residential led	0	0	0	0	0	0
GN11	Residential led	0	0	0	0	0	0
GN13	Residential led	0	0	0	0	0	0
GN14	Residential led	0	0	0	0	0	0
GN15	Residential led (mixed-use)	0	0	0	0	0	0
GN3	Residential led	0	0	0	0	0	0
GN4	Residential led	0	0	0	0	0	0
GN5	Residential led	0	0	0	0	0	0
GN6	Residential led (mixed-use)	0	0	0	-	0	0
GN8	Residential led	0	0	0	-	0	0
GS1	Residential led	0	0	-	-	-	0
GS10	Residential led (mixed-use)	0	0	0	0	0	0
GS11	Residential led	0	0	0	0	0	0
GS12	Residential led (mixed-use)	0	0	0	0	0	0
GS13	Residential led	0	0	0	0	0	0
GS14	Residential led (mixed-use)	0	0	0	0	0	0
GS18	Residential led (mixed-use)	0	0	0	0	0	0
GS19	Residential led	0	0	0	0	0	0
GS2	Residential led	0	0	0	-	0	0
GS20	Residential led	0	0	0	0	0	0
GS23	Residential led	0	0	0	0	0	0
GS24	Residential led	0	0	0	0	0	0
GS26	Residential led	0	0	0	0	0	0
GS27	Residential led (mixed-use)	0	0	0	0	0	0
GS29	Residential led	0	0	0	0	0	0
GS30	Residential led	0	0	0	-	0	0
GS32	Residential led	0	0	0	0	0	0
GS33	Residential led	0	0	0	0	0	0
GS34	Residential led	0	0	0	0	0	0
GS35	Residential led	0	0	0	0	0	0
GS37	Residential led (mixed-use)	0	0	0	-	0	0

Site ref.	Site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden
GS4	Residential led	0	0	-	-	0	0
GS5	Residential led	0	0	0	-	0	0
GS6	Residential led	0	0	0	0	0	0
GS7	Residential led (mixed-use)	0	0	0	0	0	0
GS8	Residential led (mixed-use)	0	0	0	0	0	0
HHH1	Non-residential	0	0	0	0	-	0
HHH11	Residential led	0	0	-	0	0	0
HHH14	Residential led	0	0	0	0	0	0
HHH15	Residential led	0	0	0	0	0	0
HHH16	Non-residential	0	0	0	0	0	0
HHH17	Residential led	0	0	0	0	0	0
HHH18	Residential led (mixed-use)	0	0	-	0	0	0
HHH19	Non-residential	0	0	0	0	0	0
HHH21	Non-residential	0	0	0	0	0	0
HHH23	Residential led (mixed-use)	0	0	0	0	0	0
HHH24	Residential led	0	0	--	0	0	0
HHH25	Residential led	0	0	-	0	0	0
HHH28	Residential led (mixed-use)	0	0	0	0	0	0
HHH29	Residential led (mixed-use)	0	0	0	0	0	0
HHH30	Residential led (mixed-use)	0	0	0	0	0	0
HHH32	Residential led	0	0	0	0	0	0
HHH33	Residential led	0	0	--	0	0	0
HHH37	Non-residential	0	0	0	0	0	0
HHH38	Non-residential	0	0	0	0	0	0
HHH39	Non-residential	0	0	0	0	0	0
HHH4	Residential led	0	0	0	0	0	0
HHH40	Residential led	0	0	-	0	0	0
HHH41	Residential led	0	0	0	0	0	0
HHH5	Residential led	0	0	0	0	-	0
HHH7	Residential led	0	0	-	0	0	0
HHH8	Residential led (mixed-use)	0	0	-	0	0	0
HHH9	Residential led	0	0	0	0	0	0
HW11	Residential led	0	0	0	0	0	0
HW3	Residential and secondary school	0	0	0	0	0	0
HW5	Non-residential	0	0	0	0	0	0
HW6	Residential led	0	0	0	0	0	0
HW7	Residential or non-residential	0	0	0	0	0	0
HW8	Residential led	0	0	0	0	0	0
L11	Residential led	0	0	0	0	0	0
L12	Residential led	0	0	0	0	0	0
L2	Residential led	0	0	0	0	0	0
L3	Residential led	0	0	0	0	0	0
L7	Residential led	0	0	0	0	0	0
L9	Residential led	0	0	0	0	0	0
LW10	Residential led	0	0	0	0	0	0

Site ref.	Site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden
LW2	Residential led	0	0	0	0	0	0
LW3	Residential led	0	0	0	0	0	0
LW4	Residential led	0	0	0	0	0	0
LW5	Residential led (C2 use)	0	0	0	0	0	0
LW7	Residential led	0	0	0	0	0	0
PP1	Residential led	0	0	0	0	0	0
REWW3	Residential led	0	0	0	0	0	0
RN1	Residential led	0	0	0	0	0	0
RN10	Residential led	0	0	-	-	0	0
RN11	Residential led	0	0	0	0	0	0
RN12	Non-residential	0	0	0	0	0	0
RN14	Residential led	0	-	-	0	0	0
RN16	Residential led	0	0	0	0	0	0
RN17	Residential led	0	0	0	0	0	0
RN18	Residential led	0	0	0	0	0	0
RN19	Residential led	0	0	0	0	0	0
RN2	Residential led (mixed-use)	0	0	0	0	0	0
RN22	Residential led	0	0	0	0	0	0
RN23	Residential led	0	0	0	0	0	0
RN24	Residential led	0	0	0	0	0	0
RN25	Residential led	0	0	0	0	0	0
RN26	Residential led (mixed-use)	0	0	0	0	0	0
RN27	Residential led	0	0	0	0	0	0
RN28	Residential led	0	0	0	0	0	0
RN29	Residential led	0	0	0	0	0	0
RN3	Residential led	0	0	0	0	0	0
RN30	Residential led	0	0	0	0	0	0
RN31	Residential led	0	0	0	0	0	0
RN32	Residential led	0	0	-	-	0	0
RN33	Non-residential	0	0	0	0	0	0
RN34	Residential led	0	0	0	0	0	0
RN4	Residential led (mixed-use)	0	0	-	0	0	0
RN5	Residential led (mixed-use)	0	0	-	-	0	0
RSE1	Non-residential (road spur and open space)	0	0	0	0	0	0
RSE11	Non-residential	0	0	-	-	0	0
RSE4	Residential led	0	0	0	0	0	0
RSE8	Residential led (mixed-use)	0	0	0	0	0	0
RSE9	Residential led	0	0	0	0	0	0
RWB1	Residential led	0	0	0	0	0	0
RWB10	Non-residential	0	-	-	-	-	0
RWB11	Residential led	-	-	-	-	-	0
RWB12	Residential led	0	0	-	-	0	0
RWB14	Residential led	0	0	0	-	-	0
RWB15	Residential led	0	0	0	-	-	0
RWB17	Residential led	0	0	-	-	0	0

Site ref.	Site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden
RWB18	Residential led	0	0	-	-	0	0
RWB19	Residential led (mixed-use)	0	-	-	-	0	0
RWB2	Residential led	0	0	0	0	0	0
RWB20	Residential led	0	0	-	-	0	0
RWB21	Residential led	0	0	-	-	0	0
RWB23	Non-residential	0	0	-	-	0	0
RWB25	Residential led	0	0	-	0	0	0
RWB3	Residential led	0	0	0	0	0	0
RWB4	Residential led	0	0	0	0	0	0
RWB5	Non-residential	0	0	0	0	0	0
RWB6	Residential led	0	0	0	0	0	0
RWB8	Residential led (mixed-use)	-	-	-	-	-	0
RWB9	Residential led (mixed-use)	-	-	-	-	-	0
SMI1	Residential led	0	0	-	0	0	0
SMI2	Non-residential	0	--	-	0	0	0
SNF1	Residential led	0	0	0	0	0	0
SNF10	Residential led (mixed-use)	0	0	-	0	0	0
SNF12	Residential led	0	0	0	0	0	0
SNF13	Residential led (mixed-use)	0	0	0	0	0	0
SNF15	Residential led (mixed-use)	0	0	0	0	0	0
SNF16	Residential led (mixed-use)	0	0	-	0	0	0
SNF17	Residential led	0	0	0	0	0	0
SNF18	Residential led (mixed-use)	0	0	0	0	0	0
SNF19	Non-residential	0	0	-	0	0	0
SNF2	Residential led (mixed-use)	0	0	0	0	0	0
SNF20	Residential led	0	0	-	0	0	0
SNF21	Residential led (mixed-use)	0	0	-	0	0	0
SNF22	Residential led (mixed-use)	0	0	0	0	0	0
SNF23	Residential led (mixed-use)	0	0	0	0	0	0
SNF24	Residential led (mixed-use)	0	0	0	0	0	0
SNF25	Non-residential	0	0	0	0	0	0
SNF26	Non-residential	0	0	0	0	0	0
SNF27	Residential led	0	0	0	0	0	0
SNF28	Non-residential	0	0	0	0	0	0
SNF30	Residential led (mixed-use)	0	0	0	0	0	0
SNF31	Residential led (mixed-use)	0	0	0	0	0	0
SNF32	Residential led	0	0	0	0	0	0
SNF33	Non-residential	0	0	0	0	0	0
SNF34	Residential led (mixed-use)	0	0	0	0	0	0
SNF35	Residential led (mixed-use)	0	0	0	0	0	0
SNF36	Residential led (mixed-use)	0	0	0	0	0	0
SNF37	Residential led (mixed-use)	0	0	0	0	0	0
SNF38	Residential led	0	0	0	0	0	0
SNF39	Residential led	0	0	-	0	0	0
SNF41	Residential led (mixed-use)	-	-	-	-	-	0

Site ref.	Site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden
SNF43	Residential led	0	-	-	-	0	0
SNF44	Residential led	0	0	-	-	0	0
SNF5	Residential led	0	0	0	0	0	0
SNF6	Residential led	0	0	0	0	0	0
SNF8	Residential led (mixed-use)	0	0	0	0	0	0
SNF9	Residential led (mixed-use)	0	0	0	0	0	0
SR1	Residential led	0	0	0	0	0	0
SR10	Residential led	0	0	0	0	0	0
SR13	Residential led	0	0	0	0	0	0
SR14	Residential led	0	0	0	0	0	0
SR15	Residential led	0	0	-	0	0	0
SR16	Residential led	0	0	0	0	0	0
SR18	Residential led (mixed-use)	0	0	0	0	0	0
SR2	Non-residential	0	0	0	0	0	0
SR21	Residential led	0	0	0	0	0	0
SR22	Residential led	0	0	0	0	0	0
SR24	Residential led	0	0	0	0	0	0
SR25	Residential led (mixed-use)	--	-	-	-	0	0
SR27	Residential led	-	0	-	-	0	0
SR29	Non-residential	0	0	0	0	0	0
SR3	Residential led	0	0	-	0	0	0
SR30	Residential led (mixed-use)	0	0	0	0	0	0
SR31	Residential led (mixed-use)	0	0	0	0	0	0
SR32	Residential led (mixed-use)	0	0	0	0	0	0
SR33	Non-residential	0	0	0	0	0	0
SR34	Residential led	0	0	0	0	0	0
SR35	Non-residential	0	0	0	0	0	0
SR36	Residential led (mixed-use)	0	0	0	0	0	0
SR37	Residential led (mixed-use)	0	0	0	0	0	0
SR38	Residential led (mixed-use)	0	0	0	0	0	0
SR39	Residential led (mixed-use)	0	0	0	0	0	0
SR4	Residential led	0	0	0	0	0	0
SR40	Residential led (mixed-use)	0	0	0	0	0	0
SR41	Residential led (mixed-use)	0	0	0	0	0	0
SR42	Residential led	-	0	-	0	0	0
SR43	Residential led	-	0	-	0	-	0
SR45	Non-residential	-	0	-	0	-	0
SR46	Residential led	0	0	0	0	0	0
SR47	Residential led	0	0	0	-	0	0
SR48	Residential led	0	0	0	-	0	0
SR49	Residential led	0	0	--	0	0	0
SR5	Residential led	0	0	0	0	0	0
SR50	Residential led	0	0	-	0	0	0
SR51	Residential led (mixed-use)	0	0	0	0	0	0
SR52	Residential led (mixed-use)	0	0	0	0	0	0

Site ref.	Site use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden
SR6	Residential led (mixed-use)	0	0	0	0	0	0
SR7	Residential led	0	0	0	0	0	0
SR8	Residential led	0	0	0	0	0	0
SW1	Residential led	0	0	0	0	0	0
SW2	Residential led	0	0	0	0	0	0
SW3	Residential led	0	0	0	0	0	0
SW5	Residential led	0	0	0	0	0	0
SW6	Residential led	0	0	0	0	0	0
SW7	Residential led	0	0	0	0	0	0
SW8	Residential led	0	0	0	0	0	0
T1	Non-residential	0	0	0	0	0	0
T2	Residential led	0	0	0	0	0	0
T3	Residential led	0	0	0	0	0	0
W1	Residential led	0	0	0	0	0	0
W11	Non-residential	0	0	0	0	0	0
W12	Residential led	0	0	0	0	0	0
W13	Non-residential	0	0	0	0	0	0
W14	Non-residential	0	0	0	0	0	0
W3	Residential led	0	0	0	0	0	0
W4	Residential led	0	0	0	0	0	0
W7	Residential led	0	0	0	0	0	0
W8	Residential led	0	0	0	0	0	0

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G.11 SA Objective 10: Transport and accessibility

G.11.1 Proximity to bus stop

G.11.1.1 Many bus stops are distributed throughout Medway. These are generally expected to provide regular public transport access, with the exception of some rural areas where bus services are more thinly distributed and less regular. The majority of reasonable alternative sites are located within 400m of a bus stop with regular services (283 sites in total). The proposed development at these sites is expected to result in a minor positive impact on access to sustainable transport options.

G.11.1.2 Some 51 sites are located wholly or partially outside of the sustainable distance of 400m from a bus stop providing regular services. A large portion of sites within the Hoo St Werburgh and High Halstow, and Strood Rural wards are outside of the 400m distance. The proposed development at these sites could potentially have a minor negative impact on access to sustainable transport.

G.11.1.3 Site RSE1 is proposed for a road spur and open space, and as such has not been assessed against access to public transport.

G.11.2 Proximity to railway station

G.11.2.1 There are seven railway stations located within Medway, including Halling Station, Cuxton Station, Rainham Station, Gillingham Station, Rochester Station, Chatham Station and Strood Station. Additionally, Snodland Station and Higham Station are located outside the MLP area close to the boundary. A large proportion of Medway's central areas are expected to have good access to these stations, however some sites in the north and south are located out of the sustainable 2km distance. 232 sites are located within 2km of a railway station, therefore the proposed development at these sites is likely to have a minor positive impact on access to rail services.

G.11.2.2 Some 102 sites are located over 2km from a railway station. The majority of these are located in the All Saints, Hoo St Werburgh and High Halstow, Lordswood and Walderslade, and Strood Rural wards. The proposed development at these sites could potentially have a minor negative impact on site end users' access to rail services.

G.11.2.3 Site RSE1 is proposed for a road spur and open space, and as such has not been assessed against access to public transport.

G.11.3 Pedestrian or cycle access

G.11.3.1 Sites with good pedestrian and cycle access include those with existing pavements, pathways or cycle lanes which are segregated from traffic. The pedestrian and cycle pathways are generally well distributed throughout Medway, particularly in the urban areas. A total of 269 sites are identified to be well connected to existing footpath or cycle networks. The proposed development at these sites is likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and bicycle, and reducing the requirement for new pedestrian and cyclist access to be created.

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G.11.3.2 However, 65 sites currently have poor access to the existing footpath network. The majority of these are located in the rural areas of Medway. The proposed development at these sites could potentially have a minor negative impact on local accessibility, and pedestrian/cyclist access would need improvement to be considered a viable transport option.

G.11.3.3 Site RSE1 is proposed for a road spur and open space, and as such has not been assessed against access to active travel.

G.11.4 Access to local services

G.11.4.1 Some 240 sites are identified to provide sustainable pedestrian access to local shops and services, within a distance of 600m. Sites located in urban areas generally have better access to local services, in some cases multiple stores. These sites are likely to have a minor positive impact on access to local services for site end users.

G.11.4.2 The remaining 94 sites are located wholly or partially outside of the 600m sustainable distance to local services. The majority of these are located in the rural areas of Medway. These sites are likely to have a minor negative impact on access to local services for site end users.

G.11.4.3 Site RSE1 is proposed for a road spur and open space, and as such has not been assessed against access to local services.

G.11.5 Public transport nodes

G.11.5.1 Sites located in urban areas generally have better access to a range of public transport options. Some 184 sites are located within 300m from bus stops on high frequency routes, and within 800m from a rail station via the road network. These sites are likely to have a major positive impact on sustainable access to public transport.

G.11.5.2 The remaining 150 sites do not lie within 300m from high frequency bus stops and 800m from a rail station. These sites are therefore likely to have a negligible impact on sustainable access to high-frequency public transport (sustainable access to different modes of transport has been assessed separately within other receptors).

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Table G.11.1: *Sites impact matrix for SA Objective 10 – Transport and accessibility*

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
AS1	Residential led	+	-	+	-	0
AS10	Residential led	-	-	-	-	0
AS11	Residential led (mixed-use)	-	-	-	-	0
AS14	Residential led	+	-	-	+	0
AS15	Residential led	+	-	-	+	0
AS16	Residential led (mixed-use)	+	-	+	+	0
AS17	Residential led	-	-	-	+	0
AS18	Residential led	+	-	-	-	0
AS2	Residential led	+	-	+	-	0
AS20	Residential led (mixed-use)	+	-	+	+	0
AS23	Residential led (park homes)	+	-	-	+	0
AS25	Residential led	+	-	+	+	0
AS28	Residential led	+	-	-	-	0
AS29	Residential led	+	-	-	+	0
AS3	Residential led	+	-	+	-	0
AS5	Residential led (mixed-use)	+	-	+	-	0
AS6	Residential led (mixed-use)	+	-	+	-	0
AS7	Non-residential	+	-	-	-	0
AS8	Non-residential	-	-	-	-	0
AS9	Non-residential	-	-	-	-	0
CCB1	Residential led	+	+	+	+	++
CCB10	Residential led (mixed-use)	+	+	+	+	++
CCB11	Residential led	+	+	+	+	++
CCB12	Residential led (mixed-use)	+	+	+	+	++
CCB13	Residential led (mixed-use)	+	+	+	+	++
CCB15	Residential led (mixed-use)	+	+	+	+	++
CCB16	Residential led	+	+	+	+	++
CCB17	Residential led (mixed-use)	+	+	+	+	++
CCB18	Residential led	+	+	+	+	++
CCB19	Residential led (mixed-use)	+	+	+	+	++
CCB2	Residential led (mixed-use)	+	+	+	+	++
CCB20	Residential led (mixed-use)	+	+	+	+	++
CCB21	Residential led (mixed-use)	+	+	+	+	++
CCB22	Residential led	+	+	+	-	++
CCB23	Residential led (mixed-use)	+	+	+	+	++
CCB24	Residential led (mixed-use)	+	+	+	+	++
CCB25	Residential led	+	+	+	+	++
CCB26	Residential led (mixed-use)	+	+	+	+	++
CCB27	Residential led (mixed-use)	+	+	+	+	++
CCB28	Residential led	+	+	+	+	++
CCB29	Residential led	+	+	+	+	++
CCB3	Residential led (mixed-use)	+	+	+	+	++
CCB30	Residential led (mixed-use)	+	+	+	+	++
CCB31	Residential led	+	+	+	+	++
CCB33	Residential led	+	+	+	+	++
CCB34	Residential led (mixed-use)	+	+	+	+	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
CCB35	Non-residential	+	+	+	+	++
CCB36	Residential led (mixed-use)	+	+	+	+	++
CCB37	Residential led (mixed-use)	+	+	+	+	++
CCB38	Residential led	+	+	+	+	++
CCB39	Residential led	+	+	+	+	++
CCB4	Residential led	+	+	+	+	++
CCB40	Residential led	+	+	+	+	++
CCB41	Residential led	+	+	+	+	++
CCB43	Residential led	+	+	+	+	++
CCB44	Residential led	+	+	+	+	++
CCB46	Residential led	+	+	+	+	++
CCB48	Residential led	+	+	+	+	++
CCB49	Residential led	+	+	+	+	++
CCB5	Non-residential	+	+	+	+	++
CCB6	Residential led (mixed-use)	+	+	+	+	++
CCB7	Residential led (mixed-use)	+	+	+	+	++
CCB8	Residential led	+	+	+	+	++
CCB9	Residential led	+	+	+	+	++
CHR1	Residential led	+	+	-	-	0
CHR10	Residential led	+	+	+	+	++
CHR11	Residential led	+	+	+	+	0
CHR13	Residential led (Gypsy and Traveller)	+	+	-	-	0
CHR14	Residential led (mixed-use)	+	+	-	-	0
CHR15	Non-residential	+	+	+	-	0
CHR16	Non-residential	+	+	-	-	0
CHR17	Non-residential	+	+	-	+	0
CHR18	Non-residential	+	+	+	+	0
CHR19	Non-residential	+	+	+	+	++
CHR2	Non-residential	-	+	-	-	0
CHR20	Residential led	-	+	-	+	0
CHR21	Non-residential	+	+	+	+	++
CHR3	Non-residential	-	+	+	-	0
CHR5	Non-residential	+	+	+	+	++
CHR6	Residential led	+	+	+	-	++
CHR7	Residential led	+	+	+	-	0
CHR8	Non-residential	+	+	+	-	++
FH1	Non-residential	+	-	+	+	++
FP1	Residential led	+	+	+	+	++
FP10	Residential led	+	+	+	+	++
FP11	Residential led (mixed-use)	+	+	+	+	++
FP12	Residential led	+	+	+	+	++
FP14	Residential led	+	+	+	+	++
FP16	Residential led (mixed-use)	+	+	+	+	++
FP17	Residential led	+	+	+	+	++
FP18	Residential led	+	+	+	+	++
FP19	Residential led	+	+	+	+	++
FP2	Residential led	+	+	+	+	++
FP22	Residential led	+	+	+	+	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
FP23	Residential led	+	+	+	+	++
FP25	Residential led (mixed-use)	+	+	+	+	++
FP4	Residential led	+	+	+	+	++
FP5	Residential led	+	+	+	+	++
FP6	Residential led	+	+	+	+	++
FP7	Residential led	+	+	+	+	++
FP8	Residential led	+	+	+	+	++
FP9	Residential led	+	+	+	+	++
GN10	Residential led	+	+	+	+	0
GN11	Residential led	+	+	+	-	0
GN13	Residential led	+	+	+	+	0
GN14	Residential led	+	+	+	+	++
GN15	Residential led (mixed-use)	+	+	+	+	++
GN3	Residential led	+	+	+	+	++
GN4	Residential led	+	+	+	+	++
GN5	Residential led	+	+	+	+	++
GN6	Residential led (mixed-use)	+	+	+	+	++
GN8	Residential led	+	+	+	+	0
GS1	Residential led	+	+	+	+	++
GS10	Residential led (mixed-use)	+	+	+	+	++
GS11	Residential led	+	+	+	+	++
GS12	Residential led (mixed-use)	+	+	+	+	++
GS13	Residential led	+	+	+	+	++
GS14	Residential led (mixed-use)	+	+	+	+	++
GS18	Residential led (mixed-use)	+	+	+	+	++
GS19	Residential led	+	+	+	+	++
GS2	Residential led	+	+	+	+	++
GS20	Residential led	+	+	+	+	++
GS23	Residential led	+	+	+	+	++
GS24	Residential led	+	+	+	+	++
GS26	Residential led	+	+	+	+	++
GS27	Residential led (mixed-use)	+	+	+	+	++
GS29	Residential led	+	+	+	+	++
GS30	Residential led	+	+	+	+	++
GS32	Residential led	+	+	+	+	++
GS33	Residential led	+	+	+	+	++
GS34	Residential led	+	+	+	+	++
GS35	Residential led	+	+	+	+	++
GS37	Residential led (mixed-use)	+	+	+	+	++
GS4	Residential led	+	+	+	+	++
GS5	Residential led	+	+	+	+	++
GS6	Residential led	+	+	+	+	++
GS7	Residential led (mixed-use)	+	+	+	+	++
GS8	Residential led (mixed-use)	+	+	+	+	++
HHH1	Non-residential	-	-	-	-	0
HHH11	Residential led	-	-	+	-	0
HHH14	Residential led	+	-	+	+	0
HHH15	Residential led	-	-	-	-	0

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
HHH16	Non-residential	-	-	-	-	0
HHH17	Residential led	-	-	-	-	0
HHH18	Residential led (mixed-use)	-	-	-	-	0
HHH19	Non-residential	-	-	-	+	0
HHH21	Non-residential	+	-	-	-	0
HHH23	Residential led (mixed-use)	+	-	-	+	0
HHH24	Residential led	-	-	+	-	0
HHH25	Residential led	-	-	+	-	0
HHH28	Residential led (mixed-use)	+	-	+	-	0
HHH29	Residential led (mixed-use)	+	-	+	-	0
HHH30	Residential led (mixed-use)	-	-	-	-	0
HHH32	Residential led	-	-	-	-	0
HHH33	Residential led	-	-	+	-	0
HHH37	Non-residential	-	-	-	-	0
HHH38	Non-residential	-	-	-	-	0
HHH39	Non-residential	-	-	-	-	0
HHH4	Residential led	+	-	+	+	0
HHH40	Residential led	-	-	-	-	0
HHH41	Residential led	-	-	+	-	0
HHH5	Residential led	+	-	-	+	0
HHH7	Residential led	-	-	-	-	0
HHH8	Residential led (mixed-use)	+	-	+	-	0
HHH9	Residential led	+	-	+	-	0
HW11	Residential led	-	-	-	-	0
HW3	Residential and secondary school	+	-	-	+	++
HW5	Non-residential	+	-	+	+	++
HW6	Residential led	+	-	+	-	++
HW7	Residential or non-residential	+	-	+	-	0
HW8	Residential led	+	-	+	+	++
L11	Residential led	+	+	+	+	++
L12	Residential led	+	+	+	+	++
L2	Residential led	+	+	+	+	0
L3	Residential led	+	+	+	+	++
L7	Residential led	+	+	+	+	++
L9	Residential led	+	+	+	+	++
LW10	Residential led	+	-	-	+	0
LW2	Residential led	+	-	+	+	0
LW3	Residential led	+	-	+	+	++
LW4	Residential led	+	-	+	-	0
LW5	Residential led (C2 use)	+	-	+	+	++
LW7	Residential led	-	-	-	-	++
PP1	Residential led	+	-	+	-	0
REWW3	Residential led	+	+	+	+	++
RN1	Residential led	-	-	+	+	0
RN10	Residential led	+	+	+	-	0
RN11	Residential led	+	+	+	+	0
RN12	Non-residential	+	+	+	+	0

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
RN14	Residential led	+	+	+	-	0
RN16	Residential led	+	+	+	-	0
RN17	Residential led	+	+	-	-	0
RN18	Residential led	+	+	+	+	++
RN19	Residential led	+	+	+	-	0
RN2	Residential led (mixed-use)	-	-	-	+	0
RN22	Residential led	+	+	+	+	++
RN23	Residential led	-	+	+	-	0
RN24	Residential led	+	+	+	+	++
RN25	Residential led	+	+	+	-	0
RN26	Residential led (mixed-use)	-	-	-	-	0
RN27	Residential led	-	+	+	-	0
RN28	Residential led	+	+	+	+	0
RN29	Residential led	+	+	+	+	0
RN3	Residential led	+	+	+	+	++
RN30	Residential led	+	+	+	+	0
RN31	Residential led	-	+	-	+	0
RN32	Residential led	+	+	+	-	0
RN33	Non-residential	+	+	-	-	0
RN34	Residential led	+	+	+	+	0
RN4	Residential led (mixed-use)	-	-	+	+	0
RN5	Residential led (mixed-use)	+	-	+	-	0
RSE1	Non-residential (road spur and open space)	0	0	0	0	0
RSE11	Non-residential	+	+	+	+	0
RSE4	Residential led	+	-	-	-	++
RSE8	Residential led (mixed-use)	-	+	-	-	0
RSE9	Residential led	+	+	-	+	0
RWB1	Residential led	+	+	+	+	0
RWB10	Non-residential	+	+	+	+	++
RWB11	Residential led	+	+	+	+	++
RWB12	Residential led	+	+	+	+	++
RWB14	Residential led	+	+	+	+	++
RWB15	Residential led	+	+	+	+	++
RWB17	Residential led	+	+	+	+	++
RWB18	Residential led	+	+	+	+	++
RWB19	Residential led (mixed-use)	+	+	+	+	++
RWB2	Residential led	-	-	+	+	0
RWB20	Residential led	+	+	+	+	++
RWB21	Residential led	+	+	+	+	++
RWB23	Non-residential	+	+	+	+	++
RWB25	Residential led	+	+	+	+	++
RWB3	Residential led	+	+	+	+	0
RWB4	Residential led	+	+	+	+	0
RWB5	Non-residential	+	-	+	+	0
RWB6	Residential led	+	-	+	+	++
RWB8	Residential led (mixed-use)	+	+	+	+	++
RWB9	Residential led (mixed-use)	+	+	+	+	++
SMI1	Residential led	+	-	+	+	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
SMI2	Non-residential	+	+	+	+	++
SNF1	Residential led	+	-	+	+	0
SNF10	Residential led (mixed-use)	+	+	+	+	++
SNF12	Residential led	+	+	+	+	0
SNF13	Residential led (mixed-use)	+	+	+	+	++
SNF15	Residential led (mixed-use)	+	+	+	+	++
SNF16	Residential led (mixed-use)	+	+	+	+	++
SNF17	Residential led	+	+	+	+	++
SNF18	Residential led (mixed-use)	+	+	+	+	++
SNF19	Non-residential	+	+	+	+	++
SNF2	Residential led (mixed-use)	+	-	+	+	0
SNF20	Residential led	+	+	+	+	++
SNF21	Residential led (mixed-use)	+	+	+	+	++
SNF22	Residential led (mixed-use)	+	+	+	+	++
SNF23	Residential led (mixed-use)	+	+	+	+	++
SNF24	Residential led (mixed-use)	+	+	+	+	++
SNF25	Non-residential	+	+	+	+	++
SNF26	Non-residential	+	+	+	+	++
SNF27	Residential led	+	+	+	+	++
SNF28	Non-residential	+	+	+	+	++
SNF30	Residential led (mixed-use)	+	+	+	+	++
SNF31	Residential led (mixed-use)	+	+	+	+	++
SNF32	Residential led	+	+	+	+	++
SNF33	Non-residential	+	+	+	+	++
SNF34	Residential led (mixed-use)	+	+	+	+	++
SNF35	Residential led (mixed-use)	+	+	+	+	++
SNF36	Residential led (mixed-use)	+	+	+	+	++
SNF37	Residential led (mixed-use)	+	+	+	+	++
SNF38	Residential led	+	+	+	+	++
SNF39	Residential led	+	+	+	+	++
SNF41	Residential led (mixed-use)	+	+	+	+	++
SNF43	Residential led	+	+	+	+	++
SNF44	Residential led	+	+	+	+	0
SNF5	Residential led	+	+	+	+	0
SNF6	Residential led	+	+	+	+	0
SNF8	Residential led (mixed-use)	+	+	+	+	++
SNF9	Residential led (mixed-use)	+	+	+	+	++
SR1	Residential led	-	+	-	-	0
SR10	Residential led	+	-	+	-	0
SR13	Residential led	+	+	+	-	0
SR14	Residential led	+	-	-	+	0
SR15	Residential led	+	+	+	-	0
SR16	Residential led	+	-	-	+	0
SR18	Residential led (mixed-use)	+	-	-	+	0
SR2	Non-residential	-	-	-	-	0
SR21	Residential led	-	-	-	-	0
SR22	Residential led	+	-	+	-	0
SR24	Residential led	-	-	+	-	0

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
SR25	Residential led (mixed-use)	+	+	+	+	0
SR27	Residential led	+	+	+	+	0
SR29	Non-residential	+	+	+	-	0
SR3	Residential led	+	+	-	-	0
SR30	Residential led (mixed-use)	+	+	+	+	0
SR31	Residential led (mixed-use)	+	+	+	-	0
SR32	Residential led (mixed-use)	-	+	-	+	0
SR33	Non-residential	+	+	+	+	0
SR34	Residential led	+	+	-	+	0
SR35	Non-residential	+	+	+	+	0
SR36	Residential led (mixed-use)	+	+	+	-	0
SR37	Residential led (mixed-use)	+	+	-	-	0
SR38	Residential led (mixed-use)	+	+	-	-	0
SR39	Residential led (mixed-use)	+	+	-	+	0
SR4	Residential led	+	+	-	+	0
SR40	Residential led (mixed-use)	+	+	-	-	0
SR41	Residential led (mixed-use)	+	-	+	+	0
SR42	Residential led	-	-	+	-	0
SR43	Residential led	-	-	+	-	0
SR45	Non-residential	-	-	+	-	0
SR46	Residential led	-	-	-	-	0
SR47	Residential led	-	-	+	-	0
SR48	Residential led	-	-	+	-	0
SR49	Residential led	+	-	+	-	0
SR5	Residential led	+	+	+	-	0
SR50	Residential led	+	-	-	-	0
SR51	Residential led (mixed-use)	+	-	+	+	0
SR52	Residential led (mixed-use)	-	-	+	-	0
SR6	Residential led (mixed-use)	-	-	-	-	0
SR7	Residential led	+	-	+	+	0
SR8	Residential led	+	-	+	-	0
SW1	Residential led	+	-	+	+	++
SW2	Residential led	+	-	+	+	++
SW3	Residential led	+	+	+	+	++
SW5	Residential led	+	+	+	+	++
SW6	Residential led	+	+	+	+	++
SW7	Residential led	+	+	+	+	++
SW8	Residential led	+	+	+	+	++
T1	Non-residential	+	-	+	+	0
T2	Residential led	+	-	+	+	++
T3	Residential led	+	+	+	+	++
W1	Residential led	+	+	+	+	++
W11	Non-residential	+	+	+	+	++
W12	Residential led	-	-	+	-	0
W13	Non-residential	+	-	+	+	++
W14	Non-residential	+	-	+	+	++
W3	Residential led	+	+	+	+	++
W4	Residential led	+	+	+	+	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
W7	Residential led	+	+	-	+	++
W8	Residential led	+	+	+	+	++

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G.12 SA Objective 11: Education

G.12.1 Primary school

G.12.1.1 There are 76 state funded, non-selective primary schools distributed throughout Medway. The majority of proposed residential sites (205) are located within 800m of a primary school. The proposed development at these sites is likely to have a minor positive impact on pedestrian access to primary schools.

G.12.1.2 However, some areas are likely to have more restricted access due to their rural location and the obstruction of the River Medway. Some 82 residential sites are located over 800m from a primary school. The proposed development at these sites could potentially have a minor negative impact on pedestrian access to primary schools.

G.12.1.3 A total of 47 sites are proposed for non-residential use, and Sites AS23 and LW5 are residential-led but proposed for park homes and C2 use. These sites are therefore likely to require access to schools and a negligible impact has been recorded.

G.12.2 Secondary school

G.12.2.1 There are 14 state funded, non-selective secondary schools distributed throughout Medway. The majority of proposed residential sites (195) are located within 1.5km of a secondary school. The proposed development at these sites is likely to have a minor positive impact on sustainable access to secondary schools.

G.12.2.2 Site HW3 is proposed for mixed uses including residential development and a new secondary school. While the site currently lies outside of the recommended distance to an existing secondary school, the proposed development at this site will be likely to result in a major positive impact on access to secondary education for site end users and current / future residents in surrounding areas.

G.12.2.3 Of the remaining residential-led sites, some 91 sites are located over 1.5km from a secondary school, largely owing to their rural location. The All Saints ward is severely impacted, with all sites located 4km to 12km from a secondary school. The proposed development at these 91 sites is likely to have a minor negative impact on sustainable access to secondary schools.

G.12.2.4 A total of 47 sites are proposed for non-residential use, and Sites AS23 and LW5 are residential-led but proposed for park homes and C2 use. These sites are therefore unlikely to require access to schools and a negligible impact has been recorded.

G.12.3 Further education

G.12.3.1 There are six further educational facilities distributed throughout Medway. These include the four shared Universities at Medway Campus and MidKent College. Over half of proposed residential sites (174) are located within 3km of a further educational facility. The majority of these are located in the urban area of Medway. The proposed development at these sites is likely to have a minor positive impact on access to higher education facilities.

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G.12.3.2 The remaining residential-led sites are located over 3km from a further education facility, and the proposed development at these sites is likely to have a negligible impact on access to further education.

Table G.12.1: *Sites impact matrix for SA Objective 11 – Education*

Site ref.	Site use	Primary school	Secondary school	Further education
AS1	Residential led	-	-	0
AS10	Residential led	-	-	0
AS11	Residential led (mixed-use)	-	-	0
AS14	Residential led	-	-	0
AS15	Residential led	-	-	0
AS16	Residential led (mixed-use)	-	-	0
AS17	Residential led	-	-	0
AS18	Residential led	-	-	0
AS2	Residential led	-	-	0
AS20	Residential led (mixed-use)	+	-	0
AS23	Residential led (park homes)	0	0	0
AS25	Residential led	+	-	0
AS28	Residential led	+	-	0
AS29	Residential led	-	-	0
AS3	Residential led	-	-	0
AS5	Residential led (mixed-use)	-	-	0
AS6	Residential led (mixed-use)	-	-	0
AS7	Non-residential	0	0	0
AS8	Non-residential	0	0	0
AS9	Non-residential	0	0	0
CCB1	Residential led	+	+	+
CCB10	Residential led (mixed-use)	+	+	+
CCB11	Residential led	+	+	+
CCB12	Residential led (mixed-use)	+	+	+
CCB13	Residential led (mixed-use)	+	+	+
CCB15	Residential led (mixed-use)	+	+	+
CCB16	Residential led	+	+	+
CCB17	Residential led (mixed-use)	+	+	+
CCB18	Residential led	+	+	+
CCB19	Residential led (mixed-use)	+	+	+
CCB2	Residential led (mixed-use)	+	+	+
CCB20	Residential led (mixed-use)	+	+	+
CCB21	Residential led (mixed-use)	+	+	+
CCB22	Residential led	+	+	+
CCB23	Residential led (mixed-use)	+	+	+
CCB24	Residential led (mixed-use)	+	+	+
CCB25	Residential led	-	+	-
CCB26	Residential led (mixed-use)	+	+	+
CCB27	Residential led (mixed-use)	+	+	+
CCB28	Residential led	+	+	+
CCB29	Residential led	+	+	+
CCB3	Residential led (mixed-use)	+	+	+
CCB30	Residential led (mixed-use)	+	+	+
CCB31	Residential led	+	+	+

Site ref.	Site use	Primary school	Secondary school	Further education
CCB33	Residential led	+	+	+
CCB34	Residential led (mixed-use)	+	+	+
CCB35	Non-residential	0	0	0
CCB36	Residential led (mixed-use)	+	+	+
CCB37	Residential led (mixed-use)	+	+	+
CCB38	Residential led	+	+	+
CCB39	Residential led	+	+	+
CCB4	Residential led	+	+	+
CCB40	Residential led	+	+	+
CCB41	Residential led	+	+	+
CCB43	Residential led	-	+	+
CCB44	Residential led	+	+	+
CCB46	Residential led	+	+	+
CCB48	Residential led	+	+	+
CCB49	Residential led	+	+	+
CCB5	Non-residential	0	0	0
CCB6	Residential led (mixed-use)	+	+	+
CCB7	Residential led (mixed-use)	+	+	+
CCB8	Residential led	+	+	+
CCB9	Residential led	+	+	+
CHR1	Residential led	-	-	0
CHR10	Residential led	+	-	0
CHR11	Residential led	+	-	0
CHR13	Residential led (Gypsy and Traveller)	0	0	0
CHR14	Residential led (mixed-use)	-	-	0
CHR15	Non-residential	0	0	0
CHR16	Non-residential	0	0	0
CHR17	Non-residential	0	0	0
CHR18	Non-residential	0	0	0
CHR19	Non-residential	0	0	0
CHR2	Non-residential	0	0	0
CHR20	Residential led	-	-	+
CHR21	Non-residential	0	0	0
CHR3	Non-residential	0	0	0
CHR5	Non-residential	0	0	0
CHR6	Residential led	-	-	0
CHR7	Residential led	-	-	0
CHR8	Non-residential	0	0	0
FH1	Non-residential	0	0	0
FP1	Residential led	+	+	+
FP10	Residential led	+	+	+
FP11	Residential led (mixed-use)	+	+	+
FP12	Residential led	+	+	+
FP14	Residential led	+	+	+
FP16	Residential led (mixed-use)	+	+	+
FP17	Residential led	+	+	+
FP18	Residential led	+	+	+
FP19	Residential led	+	+	+
FP2	Residential led	+	+	+

Site ref.	Site use	Primary school	Secondary school	Further education
FP22	Residential led	+	+	+
FP23	Residential led	+	+	+
FP25	Residential led (mixed-use)	+	+	+
FP4	Residential led	+	+	+
FP5	Residential led	+	+	+
FP6	Residential led	+	+	+
FP7	Residential led	+	+	+
FP8	Residential led	+	+	+
FP9	Residential led	+	+	+
GN10	Residential led	+	-	+
GN11	Residential led	+	+	+
GN13	Residential led	-	-	+
GN14	Residential led	+	+	+
GN15	Residential led (mixed-use)	+	+	+
GN3	Residential led	+	+	+
GN4	Residential led	+	+	+
GN5	Residential led	+	+	+
GN6	Residential led (mixed-use)	+	-	+
GN8	Residential led	+	+	+
GS1	Residential led	+	+	+
GS10	Residential led (mixed-use)	+	+	+
GS11	Residential led	+	+	+
GS12	Residential led (mixed-use)	+	+	+
GS13	Residential led	+	+	+
GS14	Residential led (mixed-use)	+	+	+
GS18	Residential led (mixed-use)	+	+	+
GS19	Residential led	+	+	+
GS2	Residential led	+	+	+
GS20	Residential led	+	+	+
GS23	Residential led	+	+	+
GS24	Residential led	+	+	+
GS26	Residential led	+	+	+
GS27	Residential led (mixed-use)	+	+	+
GS29	Residential led	+	+	+
GS30	Residential led	+	+	+
GS32	Residential led	+	+	+
GS33	Residential led	+	+	+
GS34	Residential led	+	+	+
GS35	Residential led	+	+	+
GS37	Residential led (mixed-use)	+	+	+
GS4	Residential led	+	+	+
GS5	Residential led	+	+	+
GS6	Residential led	+	+	+
GS7	Residential led (mixed-use)	+	+	+
GS8	Residential led (mixed-use)	+	+	+
HHH1	Non-residential	0	0	0
HHH11	Residential led	+	+	0
HHH14	Residential led	-	+	0
HHH15	Residential led	+	-	0

Site ref.	Site use	Primary school	Secondary school	Further education
HHH16	Non-residential	0	0	0
HHH17	Residential led	-	+	0
HHH18	Residential led (mixed-use)	-	-	0
HHH19	Non-residential	0	0	0
HHH21	Non-residential	0	0	0
HHH23	Residential led (mixed-use)	+	-	0
HHH24	Residential led	-	-	0
HHH25	Residential led	-	-	0
HHH28	Residential led (mixed-use)	-	-	0
HHH29	Residential led (mixed-use)	-	-	0
HHH30	Residential led (mixed-use)	-	-	0
HHH32	Residential led	-	-	0
HHH33	Residential led	-	-	0
HHH37	Non-residential	0	0	0
HHH38	Non-residential	0	0	0
HHH39	Non-residential	0	0	0
HHH4	Residential led	+	+	0
HHH40	Residential led	-	-	0
HHH41	Residential led	+	+	0
HHH5	Residential led	+	-	0
HHH7	Residential led	-	+	0
HHH8	Residential led (mixed-use)	+	+	0
HHH9	Residential led	+	+	0
HW11	Residential led	-	-	0
HW3	Residential and secondary school	-	++	0
HW5	Non-residential	0	0	0
HW6	Residential led	-	-	0
HW7	Residential or non-residential	-	-	0
HW8	Residential led	+	-	0
L11	Residential led	+	+	+
L12	Residential led	+	+	+
L2	Residential led	+	+	+
L3	Residential led	+	+	+
L7	Residential led	+	+	+
L9	Residential led	+	+	+
LW10	Residential led	-	-	0
LW2	Residential led	+	+	0
LW3	Residential led	+	-	0
LW4	Residential led	-	-	0
LW5	Residential led (C2 use)	0	0	0
LW7	Residential led	-	-	0
PP1	Residential led	+	+	0
REWW3	Residential led	+	+	+
RN1	Residential led	-	-	+
RN10	Residential led	-	-	0
RN11	Residential led	+	+	0
RN12	Non-residential	0	0	0
RN14	Residential led	-	-	0
RN16	Residential led	-	+	0

Site ref.	Site use	Primary school	Secondary school	Further education
RN17	Residential led	-	+	0
RN18	Residential led	+	+	0
RN19	Residential led	-	-	0
RN2	Residential led (mixed-use)	-	-	+
RN22	Residential led	+	+	0
RN23	Residential led	+	+	0
RN24	Residential led	+	+	0
RN25	Residential led	+	+	0
RN26	Residential led (mixed-use)	-	-	0
RN27	Residential led	+	+	0
RN28	Residential led	+	+	0
RN29	Residential led	+	+	0
RN3	Residential led	+	+	0
RN30	Residential led	+	+	0
RN31	Residential led	+	+	0
RN32	Residential led	-	+	0
RN33	Non-residential	0	0	0
RN34	Residential led	-	-	+
RN4	Residential led (mixed-use)	-	-	+
RN5	Residential led (mixed-use)	-	-	0
RSE1	Non-residential (road spur and open space)	0	0	0
RSE11	Non-residential	0	0	0
RSE4	Residential led	-	-	0
RSE8	Residential led (mixed-use)	+	+	0
RSE9	Residential led	+	+	0
RWB1	Residential led	+	-	+
RWB10	Non-residential	0	0	0
RWB11	Residential led	+	+	+
RWB12	Residential led	+	+	+
RWB14	Residential led	+	+	+
RWB15	Residential led	+	+	+
RWB17	Residential led	+	+	+
RWB18	Residential led	+	+	+
RWB19	Residential led (mixed-use)	+	+	+
RWB2	Residential led	+	+	+
RWB20	Residential led	+	+	+
RWB21	Residential led	+	+	+
RWB23	Non-residential	0	0	0
RWB25	Residential led	+	-	+
RWB3	Residential led	+	+	+
RWB4	Residential led	+	+	+
RWB5	Non-residential	0	0	0
RWB6	Residential led	+	+	+
RWB8	Residential led (mixed-use)	+	-	+
RWB9	Residential led (mixed-use)	+	-	+
SMI1	Residential led	+	+	+
SMI2	Non-residential	0	0	0
SNF1	Residential led	-	+	0
SNF10	Residential led (mixed-use)	+	+	+

Site ref.	Site use	Primary school	Secondary school	Further education
SNF12	Residential led	+	+	0
SNF13	Residential led (mixed-use)	+	-	+
SNF15	Residential led (mixed-use)	+	+	+
SNF16	Residential led (mixed-use)	+	+	+
SNF17	Residential led	+	+	+
SNF18	Residential led (mixed-use)	+	-	+
SNF19	Non-residential	0	0	0
SNF2	Residential led (mixed-use)	-	+	0
SNF20	Residential led	+	+	+
SNF21	Residential led (mixed-use)	+	+	+
SNF22	Residential led (mixed-use)	+	+	+
SNF23	Residential led (mixed-use)	+	+	+
SNF24	Residential led (mixed-use)	+	+	+
SNF25	Non-residential	0	0	0
SNF26	Non-residential	0	0	0
SNF27	Residential led	+	+	+
SNF28	Non-residential	0	0	0
SNF30	Residential led (mixed-use)	+	+	+
SNF31	Residential led (mixed-use)	+	+	+
SNF32	Residential led	-	+	+
SNF33	Non-residential	0	0	0
SNF34	Residential led (mixed-use)	+	+	+
SNF35	Residential led (mixed-use)	+	+	+
SNF36	Residential led (mixed-use)	+	+	+
SNF37	Residential led (mixed-use)	+	+	+
SNF38	Residential led	+	+	+
SNF39	Residential led	+	+	+
SNF41	Residential led (mixed-use)	+	+	+
SNF43	Residential led	+	+	+
SNF44	Residential led	+	+	0
SNF5	Residential led	+	+	+
SNF6	Residential led	-	+	+
SNF8	Residential led (mixed-use)	+	-	+
SNF9	Residential led (mixed-use)	+	-	+
SR1	Residential led	-	-	0
SR10	Residential led	-	-	0
SR13	Residential led	+	+	0
SR14	Residential led	+	-	0
SR15	Residential led	-	+	0
SR16	Residential led	+	-	0
SR18	Residential led (mixed-use)	+	-	0
SR2	Non-residential	0	0	0
SR21	Residential led	+	-	0
SR22	Residential led	+	-	0
SR24	Residential led	+	-	0
SR25	Residential led (mixed-use)	+	+	+
SR27	Residential led	-	+	+
SR29	Non-residential	0	0	0
SR3	Residential led	-	-	0

Site ref.	Site use	Primary school	Secondary school	Further education
SR30	Residential led (mixed-use)	-	+	+
SR31	Residential led (mixed-use)	-	+	+
SR32	Residential led (mixed-use)	+	+	+
SR33	Non-residential	0	0	0
SR34	Residential led	-	+	+
SR35	Non-residential	0	0	0
SR36	Residential led (mixed-use)	-	+	+
SR37	Residential led (mixed-use)	-	-	+
SR38	Residential led (mixed-use)	-	-	+
SR39	Residential led (mixed-use)	-	+	+
SR4	Residential led	-	-	0
SR40	Residential led (mixed-use)	-	+	+
SR41	Residential led (mixed-use)	+	-	0
SR42	Residential led	-	-	0
SR43	Residential led	-	-	0
SR45	Non-residential	0	0	0
SR46	Residential led	-	-	0
SR47	Residential led	-	-	+
SR48	Residential led	-	-	+
SR49	Residential led	+	-	0
SR5	Residential led	+	+	0
SR50	Residential led	+	+	0
SR51	Residential led (mixed-use)	+	-	0
SR52	Residential led (mixed-use)	-	-	0
SR6	Residential led (mixed-use)	-	-	0
SR7	Residential led	-	-	0
SR8	Residential led	-	-	0
SW1	Residential led	+	+	0
SW2	Residential led	+	+	0
SW3	Residential led	+	+	0
SW5	Residential led	+	+	0
SW6	Residential led	+	+	0
SW7	Residential led	+	+	+
SW8	Residential led	+	-	+
T1	Non-residential	0	0	0
T2	Residential led	+	-	0
T3	Residential led	+	+	0
W1	Residential led	+	+	+
W11	Non-residential	0	0	0
W12	Residential led	-	+	0
W13	Non-residential	0	0	0
W14	Non-residential	0	0	0
W3	Residential led	+	+	+
W4	Residential led	+	+	+
W7	Residential led	+	+	+
W8	Residential led	+	+	+

G.13 SA Objective 12: Economy and employment

G.13.1 Access to major employment locations

G.13.1.1 Some 37 major employment locations have been identified within Medway by the Council. These are distributed across Medway, although the north west currently lacks sustainable access to major employment locations. All of the proposed residential or mixed-use development sites (288) are within the sustainable target distance of 5km to a major employment location, as well as Site HW7 where the end use is uncertain but might include residential development. The proposed development at these 289 sites would therefore be expected to provide sustainable access to employment opportunities, and therefore result in a minor positive impact.

G.13.1.2 The remaining sites are all proposed for non-residential uses and are likely to have a negligible impact on access to major employment locations.

G.13.2 Employment floorspace provision

G.13.2.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.

G.13.2.2 There are 46 sites proposed for non-residential uses. Of these, one site (RSE1) is proposed for a road spur and open space and as such would be likely to result in a negligible impact on employment floorspace provision.

G.13.2.3 It is assumed that the remaining 45 non-residential sites have potential to provide employment-generating uses. Of these, 24 sites currently comprise (either wholly or the majority of the site) areas of vacant land, or land that is currently not being used for employment. The proposed development at these sites is therefore expected to result in a net gain in employment floorspace and are likely to result in a major positive impact in terms of increasing the provision of employment opportunities.

G.13.2.4 The remaining 21 sites proposed for non-residential use currently coincide with employment areas or existing businesses. An additional eight residential sites coincide with areas which could potentially comprise existing employment areas. The proposed use at Site HW7 is uncertain, being either residential or non-residential. It is uncertain whether proposed development at these sites will result in a net change in employment floorspace. Furthermore, 86 sites are proposed for mixed uses including residential, and it is uncertain whether the proposed development would result in a net change in employment floorspace as the proposed land uses are unknown.

G.13.2.5 Some 52 sites proposed solely for residential use coincide with existing employment areas. Development at these sites could potentially result in a net loss of employment floorspace. The proposed development at 52 of these sites is less than 1ha and is expected to have a minor negative impact on loss of employment floorspace.

G.13.2.6 Additionally, Site CHR20 coincides with a heavily industrialised area adjacent to Temple Manor, and Site GN13 coincides with multiple business including ‘Adams Motor Repairs’, ‘Wheelwright’ and ‘Lakeside Timber’. Site GN3 coincides with multiple businesses within

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Pier Road Industrial Estate. The proposed development at these three sites could potentially result in a loss of over 1ha of employment floorspace, and result in a major negative impact for employment and the economy.

G.13.2.7 The remaining 140 sites are proposed for residential use, and are located on existing greenfield land, brownfield land, or land currently allocated for residential use. The proposed development at these sites will be expected to have a negligible impact on employment floorspace.

Table G.13.1: *Sites impact matrix for SA Objective 12 – Economy and employment*

Site ref.	Site use	Employment floorspace provision	Access to major employment location
AS1	Residential led	0	+
AS10	Residential led	0	+
AS11	Residential led (mixed-use)	+/-	+
AS14	Residential led	0	+
AS15	Residential led	0	+
AS16	Residential led (mixed-use)	+/-	+
AS17	Residential led	0	+
AS18	Residential led	0	+
AS2	Residential led	0	+
AS20	Residential led (mixed-use)	+/-	+
AS23	Residential led (park homes)	0	+
AS25	Residential led	0	+
AS28	Residential led	0	+
AS29	Residential led	0	+
AS3	Residential led	0	+
AS5	Residential led (mixed-use)	+/-	+
AS6	Residential led (mixed-use)	+/-	+
AS7	Non-residential	+/-	0
AS8	Non-residential	+/-	0
AS9	Non-residential	++	0
CCB1	Residential led	0	+
CCB10	Residential led (mixed-use)	+/-	+
CCB11	Residential led	-	+
CCB12	Residential led (mixed-use)	+/-	+
CCB13	Residential led (mixed-use)	+/-	+
CCB15	Residential led (mixed-use)	+/-	+
CCB16	Residential led	-	+
CCB17	Residential led (mixed-use)	+/-	+
CCB18	Residential led	0	+
CCB19	Residential led (mixed-use)	+/-	+
CCB2	Residential led (mixed-use)	+/-	+
CCB20	Residential led (mixed-use)	+/-	+
CCB21	Residential led (mixed-use)	+/-	+
CCB22	Residential led	0	+
CCB23	Residential led (mixed-use)	+/-	+
CCB24	Residential led (mixed-use)	+/-	+
CCB25	Residential led	0	+
CCB26	Residential led (mixed-use)	+/-	+
CCB27	Residential led (mixed-use)	+/-	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
CCB28	Residential led	-	+
CCB29	Residential led	0	+
CCB3	Residential led (mixed-use)	+/-	+
CCB30	Residential led (mixed-use)	+/-	+
CCB31	Residential led	0	+
CCB33	Residential led	0	+
CCB34	Residential led (mixed-use)	+/-	+
CCB35	Non-residential	++	0
CCB36	Residential led (mixed-use)	+/-	+
CCB37	Residential led (mixed-use)	+/-	+
CCB38	Residential led	+/-	+
CCB39	Residential led	0	+
CCB4	Residential led	0	+
CCB40	Residential led	0	+
CCB41	Residential led	0	+
CCB43	Residential led	-	+
CCB44	Residential led	0	+
CCB46	Residential led	0	+
CCB48	Residential led	0	+
CCB49	Residential led	-	+
CCB5	Non-residential	+/-	0
CCB6	Residential led (mixed-use)	+/-	+
CCB7	Residential led (mixed-use)	+/-	+
CCB8	Residential led	-	+
CCB9	Residential led	-	+
CHR1	Residential led	-	+
CHR10	Residential led	0	+
CHR11	Residential led	-	+
CHR13	Residential led (Gypsy and Traveller)	0	+
CHR14	Residential led (mixed-use)	+/-	+
CHR15	Non-residential	++	0
CHR16	Non-residential	+/-	0
CHR17	Non-residential	++	0
CHR18	Non-residential	+/-	0
CHR19	Non-residential	+/-	0
CHR2	Non-residential	++	0
CHR20	Residential led	--	+
CHR21	Non-residential	+/-	0
CHR3	Non-residential	++	0
CHR5	Non-residential	++	0
CHR6	Residential led	0	+
CHR7	Residential led	0	+
CHR8	Non-residential	+/-	0
FH1	Non-residential	++	0
FP1	Residential led	-	+
FP10	Residential led	-	+
FP11	Residential led (mixed-use)	+/-	+
FP12	Residential led	-	+
FP14	Residential led	-	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
FP16	Residential led (mixed-use)	+/-	+
FP17	Residential led	0	+
FP18	Residential led	-	+
FP19	Residential led	-	+
FP2	Residential led	0	+
FP22	Residential led	-	+
FP23	Residential led	-	+
FP25	Residential led (mixed-use)	+/-	+
FP4	Residential led	0	+
FP5	Residential led	-	+
FP6	Residential led	-	+
FP7	Residential led	-	+
FP8	Residential led	-	+
FP9	Residential led	-	+
GN10	Residential led	0	+
GN11	Residential led	0	+
GN13	Residential led	--	+
GN14	Residential led	-	+
GN15	Residential led (mixed-use)	+/-	+
GN3	Residential led	--	+
GN4	Residential led	0	+
GN5	Residential led	0	+
GN6	Residential led (mixed-use)	+/-	+
GN8	Residential led	0	+
GS1	Residential led	0	+
GS10	Residential led (mixed-use)	+/-	+
GS11	Residential led	-	+
GS12	Residential led (mixed-use)	+/-	+
GS13	Residential led	-	+
GS14	Residential led (mixed-use)	+/-	+
GS18	Residential led (mixed-use)	+/-	+
GS19	Residential led	0	+
GS2	Residential led	0	+
GS20	Residential led	0	+
GS23	Residential led	0	+
GS24	Residential led	-	+
GS26	Residential led	-	+
GS27	Residential led (mixed-use)	+/-	+
GS29	Residential led	-	+
GS30	Residential led	0	+
GS32	Residential led	0	+
GS33	Residential led	0	+
GS34	Residential led	0	+
GS35	Residential led	0	+
GS37	Residential led (mixed-use)	+/-	+
GS4	Residential led	-	+
GS5	Residential led	-	+
GS6	Residential led	-	+
GS7	Residential led (mixed-use)	+/-	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
GS8	Residential led (mixed-use)	+/-	+
HHH1	Non-residential	+/-	0
HHH11	Residential led	0	+
HHH14	Residential led	0	+
HHH15	Residential led	0	+
HHH16	Non-residential	+/-	0
HHH17	Residential led	-	+
HHH18	Residential led (mixed-use)	+/-	+
HHH19	Non-residential	++	0
HHH21	Non-residential	+/-	0
HHH23	Residential led (mixed-use)	+/-	+
HHH24	Residential led	0	+
HHH25	Residential led	0	+
HHH28	Residential led (mixed-use)	+/-	+
HHH29	Residential led (mixed-use)	+/-	+
HHH30	Residential led (mixed-use)	+/-	+
HHH32	Residential led	0	+
HHH33	Residential led	0	+
HHH37	Non-residential	++	0
HHH38	Non-residential	++	0
HHH39	Non-residential	++	0
HHH4	Residential led	0	+
HHH40	Residential led	0	+
HHH41	Residential led	-	+
HHH5	Residential led	0	+
HHH7	Residential led	-	+
HHH8	Residential led (mixed-use)	+/-	+
HHH9	Residential led	0	+
HW11	Residential led	0	+
HW3	Residential and secondary school	0	+
HW5	Non-residential	+/-	0
HW6	Residential led	0	+
HW7	Residential or non-residential	+/-	+
HW8	Residential led	0	+
L11	Residential led	0	+
L12	Residential led	-	+
L2	Residential led	0	+
L3	Residential led	0	+
L7	Residential led	-	+
L9	Residential led	-	+
LW10	Residential led	+/-	+
LW2	Residential led	0	+
LW3	Residential led	0	+
LW4	Residential led	0	+
LW5	Residential led (C2 use)	+/-	+
LW7	Residential led	0	+
PP1	Residential led	0	+
REWW3	Residential led	-	+
RN1	Residential led	0	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
RN10	Residential led	0	+
RN11	Residential led	0	+
RN12	Non-residential	++	0
RN14	Residential led	0	+
RN16	Residential led	0	+
RN17	Residential led	0	+
RN18	Residential led	-	+
RN19	Residential led	0	+
RN2	Residential led (mixed-use)	+/-	+
RN22	Residential led	0	+
RN23	Residential led	0	+
RN24	Residential led	-	+
RN25	Residential led	0	+
RN26	Residential led (mixed-use)	+/-	+
RN27	Residential led	0	+
RN28	Residential led	0	+
RN29	Residential led	-	+
RN3	Residential led	+/-	+
RN30	Residential led	0	+
RN31	Residential led	0	+
RN32	Residential led	0	+
RN33	Non-residential	++	0
RN34	Residential led	+/-	+
RN4	Residential led (mixed-use)	+/-	+
RN5	Residential led (mixed-use)	+/-	+
RSE1	Non-residential (road spur and open space)	0	0
RSE11	Non-residential	+/-	0
RSE4	Residential led	0	+
RSE8	Residential led (mixed-use)	+/-	+
RSE9	Residential led	0	+
RWB1	Residential led	0	+
RWB10	Non-residential	+/-	0
RWB11	Residential led	+/-	+
RWB12	Residential led	0	+
RWB14	Residential led	-	+
RWB15	Residential led	0	+
RWB17	Residential led	0	+
RWB18	Residential led	-	+
RWB19	Residential led (mixed-use)	+/-	+
RWB2	Residential led	-	+
RWB20	Residential led	0	+
RWB21	Residential led	-	+
RWB23	Non-residential	++	0
RWB25	Residential led	0	+
RWB3	Residential led	0	+
RWB4	Residential led	0	+
RWB5	Non-residential	++	0
RWB6	Residential led	0	+
RWB8	Residential led (mixed-use)	+/-	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
RWB9	Residential led (mixed-use)	+/-	+
SMI1	Residential led	0	+
SMI2	Non-residential	++	0
SNF1	Residential led	0	+
SNF10	Residential led (mixed-use)	+/-	+
SNF12	Residential led	0	+
SNF13	Residential led (mixed-use)	+/-	+
SNF15	Residential led (mixed-use)	+/-	+
SNF16	Residential led (mixed-use)	+/-	+
SNF17	Residential led	0	+
SNF18	Residential led (mixed-use)	+/-	+
SNF19	Non-residential	+/-	0
SNF2	Residential led (mixed-use)	+/-	+
SNF20	Residential led	-	+
SNF21	Residential led (mixed-use)	+/-	+
SNF22	Residential led (mixed-use)	+/-	+
SNF23	Residential led (mixed-use)	+/-	+
SNF24	Residential led (mixed-use)	+/-	+
SNF25	Non-residential	+/-	0
SNF26	Non-residential	++	0
SNF27	Residential led	0	+
SNF28	Non-residential	+/-	0
SNF30	Residential led (mixed-use)	+/-	+
SNF31	Residential led (mixed-use)	+/-	+
SNF32	Residential led	0	+
SNF33	Non-residential	+/-	0
SNF34	Residential led (mixed-use)	+/-	+
SNF35	Residential led (mixed-use)	+/-	+
SNF36	Residential led (mixed-use)	+/-	+
SNF37	Residential led (mixed-use)	+/-	+
SNF38	Residential led	0	+
SNF39	Residential led	0	+
SNF41	Residential led (mixed-use)	+/-	+
SNF43	Residential led	0	+
SNF44	Residential led	-	+
SNF5	Residential led	0	+
SNF6	Residential led	0	+
SNF8	Residential led (mixed-use)	+/-	+
SNF9	Residential led (mixed-use)	+/-	+
SR1	Residential led	-	+
SR10	Residential led	0	+
SR13	Residential led	0	+
SR14	Residential led	0	+
SR15	Residential led	0	+
SR16	Residential led	0	+
SR18	Residential led (mixed-use)	+/-	+
SR2	Non-residential	++	0
SR21	Residential led	0	+
SR22	Residential led	0	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
SR24	Residential led	0	+
SR25	Residential led (mixed-use)	+/-	+
SR27	Residential led	0	+
SR29	Non-residential	++	0
SR3	Residential led	0	+
SR30	Residential led (mixed-use)	+/-	+
SR31	Residential led (mixed-use)	+/-	+
SR32	Residential led (mixed-use)	+/-	+
SR33	Non-residential	+/-	0
SR34	Residential led	-	+
SR35	Non-residential	+/-	0
SR36	Residential led (mixed-use)	+/-	+
SR37	Residential led (mixed-use)	+/-	+
SR38	Residential led (mixed-use)	+/-	+
SR39	Residential led (mixed-use)	+/-	+
SR4	Residential led	0	+
SR40	Residential led (mixed-use)	+/-	+
SR41	Residential led (mixed-use)	+/-	+
SR42	Residential led	0	+
SR43	Residential led	0	+
SR45	Non-residential	++	0
SR46	Residential led	0	+
SR47	Residential led	0	+
SR48	Residential led	0	+
SR49	Residential led	+/-	+
SR5	Residential led	0	+
SR50	Residential led	0	+
SR51	Residential led (mixed-use)	+/-	+
SR52	Residential led (mixed-use)	+/-	+
SR6	Residential led (mixed-use)	+/-	+
SR7	Residential led	0	+
SR8	Residential led	0	+
SW1	Residential led	0	+
SW2	Residential led	0	+
SW3	Residential led	0	+
SW5	Residential led	0	+
SW6	Residential led	-	+
SW7	Residential led	0	+
SW8	Residential led	0	+
T1	Non-residential	++	0
T2	Residential led	0	+
T3	Residential led	0	+
W1	Residential led	0	+
W11	Non-residential	++	0
W12	Residential led	-	+
W13	Non-residential	+/-	0
W14	Non-residential	++	0
W3	Residential led	0	+
W4	Residential led	-	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
W7	Residential led	+/-	+
W8	Residential led	0	+

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Appendix H: Policy assessments

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H.1 Overview

H.1.1 Introduction

H.1.1.1 This appendix provides an assessment of two statements (the Vision for Medway in 2041; and the Spatial Development Strategy) and 88 draft policies prepared by Medway Council for the Regulation 19 version of the Medway Local Plan 2041.

H.1.1.2 These statements and policies have been refined and updated by the Council, drawing on recommendations from the Regulation 18 Interim SA (2024) and other evidence base information, as well as responses received to the Regulation 18 consultation.

H.1.1.3 Each proposed statement and policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix B**), in accordance with the methodology as set out in **Chapter 4** of the Regulation 19 SA Report (**Volume 2**).

H.1.1.4 The policies assessed within this appendix are based on the most up to date policy wording at the time of assessment, provided by Medway Council on 12th June 2025. The policy text used in the SA is presented in a box alongside each of the assessment narratives within this document. It should be noted that there may be minor wording or formatting changes to the policies compared to that within the Regulation 19 Consultation version of the Local Plan.

H.1.1.5 For ease of reference the scoring system is summarised in **Table H.1.1** below.

Table H.1.1: *Presenting likely impacts*

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed policy contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed policy contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed policy has no effect or a negligible effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed policy has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed policy prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed policy prevents the achievement of the SA Objective to a significant extent.	--

H.1.1.6 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.

H.1.1.7 The sustainability performance of each policy is assessed in isolation from other policies in the Regulation 19 Local Plan. Where negative effects are identified, there is the potential for other policies to mitigate these impacts. The residual impacts of the Local Plan as a whole including consideration of the overall mitigating effects of the Plan policies are discussed within the main Regulation 19 SA Report (see **Volume 2**).

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H.1.2 Overview of policy assessments

H.1.2.1 The impact matrices for all policy assessments are presented in **Table H.1.2** below. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

H.1.2.2 Within these policy assessments, where relevant, some recommendations for enhancement or improvement of the policies have been suggested. These recommendations, alongside more general recommendations for the plan making process, are presented in **Chapter 18** of the Regulation 19 SA Report (**Volume 2**).

Table H.1.2: *Summary of policy assessments*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
Vision	++	++	+	+	+	+	++	++	++	++	++	++
SDS	+	+/-	+/-	+	+/-	+	++	+	+/-	+/-	+	++
S1	++	++	+	0	+	+	0	+	0	+	0	+
S2	+	+	+/-	+	+	+	0	0	0	0	0	0
S3	+	+	+/-	+	0	+	-	0	0	0	0	-
S4	+	+	+	++	0	+	0	+	+	0	0	0
S5	+	+	+	+	+	+	0	+	+	+	0	0
S6	+	+	+	++	0	+	0	+	+	0	0	0
DM1	+	++	+	+	+	+	0	+	0	0	0	+
DM2	0	0	+	0	+	+	+	+	0	0	0	0
DM3	0	0	+	0	+	0	0	+	0	0	0	0
DM4	0	0	0	0	+	0	0	+	0	0	0	0
S7	+	+	+	+	0	+	+	+	0	0	0	0
T1	+	+	+	++	0	+	+	+	0	+	+	+
DM5	0	0	0	+	+	0	+	+	0	0	0	0
DM6	+	+	+	+	+	+	+	+	0	+	+	0
DM7	0	0	0	+	0	0	0	0	+	0	0	0
DM8	0	0	0	+	0	0	0	0	0	0	0	0
S8	0	0	0	+	0	0	0	+	++	0	0	0
DM9	0	0	0	+	0	0	0	0	+	0	0	0
S9	+	0	0	+	0	0	0	0	++	+	0	+
DM10	0	0	0	+	0	0	0	0	+	0	0	0
DM11	0	0	0	0	0	0	0	0	+	0	0	0
T2	+	0	0	0	0	0	+	+	0	0	0	+
T3	+	0	0	0	0	0	+	+	0	0	0	0
T4	0	0	0	0	0	0	+	+	0	+	0	0
T5	+	0	0	0	0	0	+	0	0	+	+	0
T6	0	0	0	+	0	0	+	0	0	0	0	0
T7	0	0	+	0	0	0	+	0	0	0	0	0
T8	0	0	0	0	0	0	+	0	0	0	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T9	0	0	0	+	0	0	+	0	0	0	0	0
T10	0	+	+/-	-	+/-	+	+	+	+/-	+	+	0
T11	0	0	0	+	0	0	+	0	0	+	0	+
S10	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++
S11	0	0	0	0	0	0	0	0	0	0	0	+
S12	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++
T12	+	0	0	0	+	0	0	+	0	+	++	+
T13	0	+	+	+	0	0	0	+	+	+/-	0	+
S14	0	0	0	+	0	0	0	+	+	+	0	+
T14	0	0	0	0	0	0	0	0	0	+	0	+
S15	+	+	+	+	+	+	0	+	+/-	+	0	++
S16	+	+	+/-	+	+	+	0	+	+/-	+	0	++
T15	+	+	+/-	+	+	+	0	+	+/-	+	0	+
T16	0	0	0	0	0	0	0	0	0	0	0	+
T17	+	0	0	0	0	0	0	+	0	+	0	+
S17	+	0	0	0	0	+	+	+	+	+	0	++
S18	+	0	0	0	0	0	0	+	0	0	0	+
S19	0	0	0	+	+	0	0	+	0	+	0	+
S20	+	0	0	+	+	+	0	++	+/-	+	0	++
S21	0	0	0	0	+	0	0	+	0	+	0	+
S22	+	0	0	0	+	0	0	+	0	+	0	+
S23	0	0	0	0	0	0	0	0	0	0	0	+
DM12	+	0	0	+	+	0	0	+	0	+	0	+
T18	+	0	0	0	+	0	0	+	0	+	0	+
T19	0	0	0	+	0	0	0	0	0	0	0	+
DM13	+/-	0	0	0	+/-	0	0	+	0	+/-	0	+
DM14	+/-	+	+	+	+/-	+	0	+	+	+	0	+
DM15	+	0	0	0	+	0	0	+	0	+	0	0
T20	+	0	+/-	+	+	0	0	+	+/-	+	0	+/-
DM16	+	0	+/-	+/-	+	0	0	+	0	+	0	+
DM17	+	0	0	0	+	0	0	0	0	++	0	+
T21	0	0	0	0	0	+	0	0	+/-	+	0	++
T22	0	0	0	0	0	0	0	0	+/-	0	0	+
T23	0	0	0	0	0	0	0	0	0	+	+	+
T24	+/-	0	0	0	+/-	0	0	0	0	+/-	0	+
T25	+	0	0	+	+	0	0	+	0	+	0	0
T26	+	0	0	0	+	0	0	+	0	+	+	0
DM18	+	0	0	0	+	0	0	+	0	++	+	+
DM19	+	0	0	+	0	+	0	0	0	+	0	+
DM20	+	0	0	+/-	+	0	0	+	0	+	+	+

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T27	+	0	0	0	0	0	0	++	0	+	0	0
T28	+	+	+	+	0	0	0	++	0	0	0	0
DM21	+	+	+	+	+	0	0	++	0	+	0	0
T29	+	0	0	0	0	0	0	+	+	+	0	0
S24	+	+	0	++	+	0	0	++	0	++	++	+
DM22	+	0	0	0	+	0	0	0	0	+	+	++
T30	0	0	0	0	0	++	+/-	0	0	0	0	+
T31	0	0	0	0	0	+	+/-	0	0	0	0	+
T32	+	0	-	+	+	+	0	-	+/-	+	0	+
T33	+	0	-	-	-	++	0	-	+/-	+	0	+
DM23	+	0	0	0	++	+	0	0	0	0	0	0
T34	0	0	0	0	+	0	0	0	0	0	0	0
T35	+/-	-	-	-	++	-	0	-	-	-	0	0
T36	0	0	0	0	+	+/-	0	0	0	0	0	0
T37	+	+/-	+/-	+/-	+	+/-	0	+/-	+/-	+/-	0	0
T38	+/-	+/-	+/-	0	+	+/-	0	+/-	+/-	+/-	0	0
T39	+/-	0	0	+	+	+	0	0	+	+/-	0	0
T40	0	0	0	0	+	0	0	0	0	0	0	0
S25	++	--	--	-	+/-	-	0	+/-	-	-	+	++
T41	+	0	0	0	0	0	0	+	0	0	0	0

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H.2 Vision and development strategy

H.2.1 Vision for Medway in 2041

Vision for Medway in 2041

The Plan's vision is to strengthen Medway's position in the economy and culture of the region, connected to its surrounding coast and countryside, and displaying its rich heritage; with a thriving economy, where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets. Housing and economic development needs have been met in full, supported by appropriately phased infrastructure. Growth has been shaped by understanding the area's important historic environment, respecting identity and strengthening distinctiveness.

By 2041, Medway will have achieved a significant reduction in carbon emissions (well on its pathway to net zero by 2050) aided by developments which have adopted high sustainable buildings standards (not just in construction but re-use and refurbishment too) and are achieving ambitious net zero carbon targets.

Alongside this, adaptation is an essential component of all development and Medway is well prepared for its long-term future adaptation needs. Medway is delivering against a strong local energy plan and communities are harnessing the results of their direct involvement in decision making on community owned, local energy infrastructure.

Medway has conserved and enhanced its intrinsic cultural and natural heritage and landscapes alongside high quality development to strengthen the area's distinctive character. Medway has achieved sustainable growth, development that has responded positively to tackling climate change, providing for healthier and more sustainable choices of homes, transport and workplaces, and reducing and mitigating the risks of flooding, overheating, drought and soil erosion. Natural assets will play an important role in carbon sequestration and adaptation and bring associated benefits of enhanced biodiversity, good air quality and improved public health. The countryside, coast and the urban open spaces are valued and benefit as joined up environmental assets in a resilient green and blue infrastructure network across land and water. Important wildlife and heritage assets are protected and enhanced, contributing to the Local Nature Recovery Strategy.

Medway is defined by its river and estuaries. The urban waterfront is animated and accessible. Continuous riverside paths provide attractive and healthy connections, a draw for visitors and residents. The rural character of the Medway Valley and the Medway and Thames estuaries are valued landscapes and habitats are in good condition. There are new opportunities for river transport. All sectors and ages of the community can find decent places to live. The quality of new development has enhanced Medway's profile, and driven up environmental standards in construction. Property owners have felt sufficiently supported to retrofit older properties to make them more energy efficient and less vulnerable to the impacts of climate change such as overheating. Custom and self-build housing has provided new living opportunities for residents. Investment in new services and infrastructure, such as transport, schools, healthcare and open spaces, has supported housebuilding to provide a good quality of life for residents, including the retrofitting of accessible greenspaces to existing settlements.

Improved travel choices and infrastructure have reduced the use of the car across Medway, with people benefitting from better provision for pedestrians and cyclists, and a greater public transport offer. This has transformed how people move through the central urban areas, improved air quality and strengthened the connections with wider neighbourhoods and villages.

Medway is a healthy place in which to live and work. People can move around more easily, with good walking and cycling links and clean air. All sectors of the community can enjoy the outdoors, with spaces designed for

Vision for Medway in 2041

play, leisure, access and rest. People have a choice of affordable and healthy food and can grow their own. Public spaces are inclusive, designed with care and imagination for all to share. People can meet most of their daily needs in their local area, such as schools, grocery shopping and places to socialise and exercise, reducing the need to travel, and benefitting from the co-location of services. Medway has responded to the needs of its growing and changing communities, as an inclusive and caring place, where people feel safe and are supported in their health and well-being. Communities are connected, and there is a good range of facilities and services to facilitate interaction and social activities, supporting a vibrant and diverse voluntary sector. There is clear progress in tackling inequalities and improving health and well-being. The ambitions of Child First Medway are being delivered and children and young people have benefitted from better starts in their lives.

Our high streets and centres have developed new uses and attractions in response to changes in retail, leisure and work patterns. Heritage and culture are celebrated and contribute to the quality of new development and community wellbeing, raising pride in Medway and enriching the lives of residents and visitors. Development has sustained and enhanced Medway's historic environment and improved access to heritage and cultural opportunities. Medway benefits from a network of centres that reflect the distinct character of its different towns, neighbourhoods and villages, and which serve local communities and visitors. Our public spaces embrace culture and are animated and welcoming to all.

Medway is a leading economic player in the region, supporting the growth of its business base and attracting new investment. It has capitalised on its cluster of higher and further education providers to raise skills levels across the workforce. Graduates and the wider workforce can develop their future careers in quality jobs in Medway. There is a broad portfolio of employment sites. Derelict sites at Grain and Kingsnorth on the Hoo Peninsula have been transformed into thriving economic hubs. Medway is known for its innovation and creativity, with businesses adapted to changes in the economy and the environment, and leading in green growth and technology, benefitting from excellent digital connectivity. High Streets are sought after locations for a range of businesses, providing space for start-ups and co-working facilities that reduce people's need to commute. Heritage and culture contribute to the distinct and attractive offer for businesses, community enterprises and voluntary organisations. Medway's farmland produces quality food and drink and is contributing to the management of natural resources. The contribution of Medway's rich environmental heritage and the economic benefit to the area is valued through eco-tourism.

Medway's economic mineral resources may be worked to meet needs and will be safeguarded from unnecessary sterilisation and for use by future generations. Wharves and rail depots continue to be utilised for the importation and distribution of minerals and will be safeguarded for this purpose. A positive legacy will be left by mineral supply development in Medway.

Waste is managed as far up the Waste Hierarchy as possible to achieve a more circular economy. A significant reduction in emissions from waste (including water) is achieved through provision of infrastructure and services which support people to reduce waste and reuse more. The circular economy is embedded into business models and applied to developments.

	1	2	3	4	5	6	7	8	9	10	11	12
Statement	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
Vision	++	++	+	+	+	+	++	++	++	++	++	++

H.2.1.1 The vision for the Medway area up to 2041 sets out a wide range of sustainability topics, with a focus on sustainable development and the enhancement of quality of life for current and future residents within the Medway area.

H.2.1.2 The vision supports the creation of a leading economic and cultural city in the region where people can meet many of their daily needs in their local area, such as education, grocery shopping and places for community interaction. The Council will aim to ensure that Medway is *"well on its pathway to net zero by 2050"*, where various strategies and plans to mitigate the effects of climate change are being actively pursued, including opportunities for carbon sequestration. Residents will be able to benefit from the *"better provision for pedestrians and cyclists and a greater public transport on offer"*, reducing their need for private car use and associated greenhouse gas (GHG) emissions. The vision is likely to have a major positive impact on climate change mitigation (SA Objective 1).

H.2.1.3 The vision aims to reduce the *"risks of flooding, overheating, drought and soil erosion"* through ensuring there are *"joined up environmental assets in a resilient green and blue infrastructure network"*, which could potentially help to reduce water runoff, flood risk and generate a cooling effect. The vision recognises the importance of planning for the longer term; therefore, a major positive impact on climate change adaptation is identified (SA Objective 2).

H.2.1.4 The vision seeks to protect the important biodiversity features across Medway, including the coastal designations, and support nature recovery. Green and blue infrastructure (BI) improvements will contribute towards enhanced and better-connected ecological networks throughout the Plan area and the policy outlines that Medway's wildlife will be protected and enhanced. A minor positive impact on biodiversity is identified (SA Objective 3). **Recommendation:** Stronger reference to delivering measurable net gains for biodiversity and the conservation, enhancement and monitoring of sensitive habitats and species alongside planned growth would reinforce the vision.

H.2.1.5 The policy seeks to ensure that the valued landscapes of Medway Valley and the Medway and Thames Estuaries are in good condition, and that by 2041 the Plan area has "*conserved and enhanced its intrinsic cultural and natural heritage landscapes alongside high quality development to strengthen the area's distinctive character*". The Local Plan will deliver housing and employment sites to meet identified needs and such developments have the potential to have impacts on landscape character and visual amenity. By seeking to protect valued landscapes and strengthen character alongside delivering growth, the policy may enhance the sense of place and have a minor positive impact on Medway's landscapes and townscapes (SA Objective 4).

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H.2.1.6 The vision supports the improvement of air quality and would seek to minimise waste by promoting a circular economy, supported by appropriate infrastructure, which potentially leads to a minor positive impact on pollution and waste (SA Objective 5). **Recommendation:** The vision could be enhanced through incorporating reference to protecting and enhancing water quality.

H.2.1.7 The vision also seeks to ensure that, by the end of the Plan period, there is good natural resources management and mineral resources are safeguarded for future generations. The vision has the potential to have a minor positive impact on natural resources (SA Objective 6). **Recommendation:** The vision could be enhanced by setting out a clear preference for brownfield development, seeking to make the best use of available land and redevelop urban centres.

H.2.1.8 By the end of the Plan period, the vision aims to ensure that the provision of new homes throughout Medway, provides choice for residents and meet the required needs of different sectors of the community. Additionally, the policy highlights that custom and self-build housing has the potential to provide new opportunities for residents. A major positive impact on housing is therefore expected (SA Objective 7).

H.2.1.9 The vision aims for a well-connected city, where active and sustainable travel between the town centres is encouraged and residents have ready access to outdoor spaces to meet a variety of recreational needs. People will have access to a range of healthy food and encouraged to grow their own food. The vision supports the creation of vibrant town centres and public spaces, which are inclusive and provide opportunities for community interaction and enhance a sense of civic pride. The vision seeks to have a major positive impact on human health (SA Objective 8).

H.2.1.10 The vision seeks to protect and enhance cultural heritage assets, and improve understanding and appreciation of Medway's heritage. The focus on "*respecting identity and strengthening distinctiveness*" could lead to a major positive impact on the historic environment (SA Objective 9).

H.2.1.11 The vision sets out enhanced sustainable travel connections between the towns and to the waterfront areas, facilitating active travel and reducing reliance on private vehicles and improving permeability of the public realm. There is the potential for improved public transport connections across Medway, as well as *"new opportunities for river transport"*. The vision recognises the importance of reducing the need to travel through careful planning and co-location of homes and services. Overall, these aspirations will be likely to lead to a major positive impact on transport and accessibility (SA Objective 10).

H.2.1.12 The vision outlines that through investment in the area, Medway will have *"capitalised on its cluster of higher and further education providers to raise skills levels across the workforce … and … can develop their future careers in quality jobs"*. The vision also outlines the importance of investment in schools in securing a good quality of life for Medway residents. A major positive on access to and investment in education and the creation of a skilled workforce could be expected (SA Objective 11).

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H.2.1.13 It is envisioned that by 2041, Medway will be a "*leading economic player in the region*" able to support the delivery of high quality, high skilled jobs for its residents. The vision for the area is to support a broad portfolio of business types, including the redevelopment of industrial sites on the Hoo Peninsula to expand the high technology employment sector. The regeneration of high streets would attract a variety of business types, including start-ups. These measures may also attract new inward investment. Therefore, a major positive impact on the local economy will be expected (SA Objective 12).

H.2.2 Spatial development strategy

Spatial Development Strategy

The Council will support the implementation of a spatial strategy to deliver sustainable development in Medway up to 2041 that meets full provision for Medway's development needs. Development is supported where it demonstrates that it contributes to the conservation and enhancement of the natural and built environment, and the Council's ambitions for sustainable growth, set out in the strategic objectives in the plan. The spatial development strategy supports the Council's commitment to achieve a net zero carbon Medway and to tackle the negative impacts of climate change through adaptation. These include reducing reliance on cars, reducing the need to travel and providing for sustainable travel choices, and strengthening blue and green infrastructure networks across Medway.

Medway has a high proportion of land designated of national or international importance for wildlife and landscape. These areas have the highest degree of protection from development, and the policies in this plan require their conservation and enhancement. A wider network of green and blue infrastructure across Medway seeks to connect countryside, parks and open spaces, and water bodies, to provide resilience for nature, secure landscape character, support health and wellbeing, and protect environmental resources. This green network informs the spatial strategy, separating urban Medway from the Hoo Peninsula and Kent Downs and providing strategic green corridors in the urban and suburban areas The plan seeks to deliver the multiple benefits of well designed green and blue infrastructure, particularly in urban areas where there is a deficit of high quality accessible greenspace. The Council will seek opportunities for development to address areas of poor environmental amenity, delivering Biodiversity Net Gain (BNG), contributing to the implementation of the Kent and Medway Local Nature Recovery Strategy, improving air quality, and contributing to more attractive places, that are accessible to our communities to enjoy.

The development strategy for Medway prioritises regeneration, making the best use of previously developed land and directing investment to urban waterfront and centre opportunity areas. The rivers and estuaries will have a key role in the identity and function of Medway. This promotes Medway's ambitions to lift pride in the area, delivering quality development that respects our heritage, supports health and well-being and a resilient and attractive environment. The urban waterfront regeneration programme from Strood to north Gillingham will link to renewed centres and places. Development will be required to support improvements to active travel and green infrastructure, such as cycle paths, increasing canopy cover and sustainable urban drainage to deliver on the aims for Medway's communities and environment.

Chatham is an important focus for much of the urban regeneration, with development proposed in the centre of Chatham; and on waterfront sites; and in adjacent areas to the centre, such as Chatham Intra and the station gateway. The strategy is informed by the Chatham Design Code and the Chatham Intra Heritage Action Zone development framework to provide for new homes, workspaces, retail, leisure and community facilities. Chatham will provide the primary centre function for Medway, benefitting from its sustainable transport links and additional investment in cultural and community infrastructure.

Spatial Development Strategy

Strood also provides for significant new opportunities for redevelopment alongside the riverside and central areas, and as a hub for sustainable transport. The completion of Rochester Riverside forms an important component of the wider waterfront regeneration programme. Redevelopment to the north of Gillingham will consolidate the links between St Mary's Island and Gillingham town centre, and support the further development of the learning cluster of Universities and Colleges, and strengthen the town centre. There are opportunities for further mixed-use urban neighbourhoods with the potential for redevelopment at Medway City Estate. The regeneration of the Frindsbury Peninsula will extend beyond the plan period and by 2050 will provide for mixed development, including new homes, green infrastructure, and a modern employment base. It will contribute to Medway's revitalised urban centre, with the river establishing place-making and nature-based solutions to managing flood risk.

The spatial strategy provides for a range of development needs. Growth in different parts of the urban, suburban and rural areas will reflect their distinctive character and identity, the potential for a mix of development and the need for upgrades in infrastructure and services.

Outside of the urban regeneration areas, the Council will support the expansion of identified suburban neighbourhoods and villages, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided. Large scale growth in these areas, including Hoo St Werburgh and Chattenden, Capstone Valley, West of Strood and Lower Rainham, will require strategic masterplans to manage and phase the delivery of housing, employment, transport and wider infrastructure, and environmental measures. On such greenfield sites, the Council will require a high standard of design quality and environmental sustainability to contribute to net zero carbon aims, reducing the need to travel and achieving a modal shift from car based travel. Development will respond positively to the environmental context and realise opportunities to boost biodiversity and resilience.

The planned growth of Hoo St Werburgh as the principal settlement on the Hoo Peninsula will extend beyond the plan period into the 2040s. The vision is for a thriving community, supported by a good range of services, including retail, schools, health, sports and community facilities, where development has been successful in responding sensitively to the countryside and coastal setting and heritage informs the sense of place.

The function and extent of the metropolitan Green Belt in Medway will be retained, and the Council will ensure that substantial weight is given to the potential for any harm when considering development proposals in the Green Belt.

Development will be required to demonstrate sensitivity to the rich and diverse built and natural heritage of Medway, to provide for quality growth and strengthen the distinctiveness and functions of local towns, neighbourhoods and villages.

The strategy provides for sustained economic growth, through providing a mixed portfolio of employment sites, supporting business growth and capitalising upon a skilled workforce, benefitting from the local Universities and Colleges. This portfolio includes strategic development sites on the Hoo Peninsula that have unique opportunities to support new and developing sectors, as the economy develops responses to environmental and industrial policies. The Innovation Park Medway provides for technology and other high value industries. Further employment sites will contribute to meeting the needs of businesses in Medway.

The strategy provides for the coordination of infrastructure delivery to support wider growth. Land is safeguarded for the delivery of a passenger rail service connecting the Hoo Peninsula to the North Kent services, and a sustainable travel link connecting Chatham Docks with Gillingham town centre, and transport

Spatial Development Strategy

hub in Strood. Development will be required to mitigate the impacts of its growth in line with the council's policy on infrastructure contributions.

	1	2	3	4	5	6	7	8	9	10	11	12
Statement	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SDS	+	+/-	+/-	+	+/-	+	++	+	+/-	+/-	+	++

H.2.2.1 The Spatial Development Strategy for the Medway Local Plan up to 2041 focuses on promoting sustainable development, including improvements to infrastructure, housing availability and quality, and employment, while seeking environmental protection and enhancement and supporting the health and wellbeing of residents.

H.2.2.2 The spatial strategy prioritises urban regeneration, with Chatham as the main focus. Sites would be allocated in the centre of Chatham, on waterfront sites and in adjacent areas, such as Chatham Intra and the station gateway. Strood and Gillingham also offer opportunities for regeneration, as well as potential at Medway City Estate for redevelopment of *"mixed-use urban neighbourhoods"*. Development in suburban locations and villages is supported "*where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided*". The strategy sets out the intention to meet the locally identified need for housing and would be anticipated to have a major positive impact on housing delivery (SA Objective 7).

H.2.2.3 The spatial strategy supports sustained economic growth within Medway with a strong focus on urban regeneration. Additional employment sites are proposed on the Hoo Peninsula, which seek to support new and developing sectors. Employment in technology and other high value industries will be delivered at the Innovation Park Medway. These measures seek to enhance the delivery of a greater range of employment opportunities, particularly in higher value employment sectors and may lead to higher skill levels in the local workforce. The strategy has the potential to have a major positive impact on employment (SA Objective 12).

H.2.2.4 The spatial strategy seeks to address climate change mitigation by supporting the regeneration of urban areas where there is a greater likelihood that daily journeys to satisfy employment and retail needs could be met through sustainable or active transport, such as walking, cycling or using public transport and the potential for reduced use of private vehicles, a key contributor to GHG emissions in the Medway area. The strategy aims to support the Council's net zero goals through such reduction in private car use as well as through *"strengthening blue and green infrastructure networks across Medway",* which has the potential to contribute to climate change mitigation through the protection of soils, a key carbon sink, and through the provision of new planting associated with the GI network. On balance, there is likely to be a minor positive impact on climate change mitigation (SA Objective 1) associated with the spatial strategy.

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H.2.2.5 The spatial strategy will direct growth towards some waterfront locations and other locations in the Plan area, some of which lie within Flood Zones 2 and 3. Areas of higher flood risk are found in Strood, parts of Chatham as well as some suburban locations, such as Rainham. There are coastal flood defences along much of the River Medway and River Thames which would serve to redefine these flood zones, although climate change may have implications for the effectiveness of current defences in future. The strategy emphasises the importance of a resilient network of green and blue infrastructure and seeks to tackle the impacts of climate change. The spatial strategy is likely to lead to both positive and negative effects in terms of adaptation to climate change, with an uncertain effect identified overall at this stage (SA Objective 2).

H.2.2.6 The development strategy seeks to conserve and enhance nationally and internationally protected sites for biodiversity. The strategy describes the 'green network' which will inform the proposed spatial strategy. This comprises the "*wider network of green and blue infrastructure across Medway [which] seeks to connect countryside, parks and open spaces, and water bodies*". The Council will also work to *"address areas of poor environmental amenity, delivering biodiversity net gain"*. These measures will be likely to lead to benefits for the conservation of biodiversity sites and the wider ecological network. However, at this stage, there is a level of uncertainty regarding these impacts. A package of mitigation measures known as the Hoo Peninsula Strategic Environmental Programme has been prepared and is currently being discussed with statutory consultees, and in particular, Natural England. The mitigation measures seek to address potential impacts on European sites (such as Special Protection Areas (SPAs) and Ramsar sites) and nationally designated sites (such as Sites of Special Scientific Interest (SSSIs)). At this stage of the assessment process the overall impacts on biodiversity are uncertain (SA Objective 3).

H.2.2.7 The strategy supports the enhancement and protection of the natural and built environment, ensuring that *"development will be required to demonstrate sensitivity to the rich and diverse built and natural heritage of Medway"*. Additionally, the strategy aims to ensure that the function and extent of the Green Belt, which is located to the west and south west of the Plan area, is retained which will help to prevent settlement coalescence and urbanisation of the countryside. The focus on urban regeneration may also give rise to benefits for local character and identity. These measures have the potential to have a minor positive impact on the character of Medway's landscapes and townscapes (SA Objective 4).

H.2.2.8 By seeking to provide a network of green and blue infrastructure, the strategy will be expected to improve air quality by providing natural filtration, reducing residents' exposure to air pollutants. The strategy also seeks to enhance sustainable transport choices and reduce travel by private car. There is the potential for minor positive impacts on pollution and waste. However, the proposed development and regeneration in the strategy is likely to lead to an increase in the number of vehicle trips for private and commercial uses and an increase in the total amount of waste generated in the Plan area. Overall, there are likely to be mixed effects in relation to SA Objective 5.

H.2.2.9 The spatial strategy focuses on urban regeneration and the redevelopment of previously developed land. This approach would serve to reduce the use of greenfield sites and promote an efficient use of land. The spatial strategy would result in minor positive impacts for natural resources (SA Objective 6).

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H.2.2.10 The spatial strategy has the potential to enhance the health and wellbeing of existing and new residents through encouraging active travel and improved access to GI for outdoor recreation. The strategy seeks to improve the vitality of town centres which may enhance opportunities for community interaction and increase civic pride. The development of housing and enhancing employment opportunities in the Plan area will also contribute to enhancing wellbeing by ensuring good quality homes and well-paid job opportunities are locally available. Overall, there is the potential for the strategy to have a minor positive impact on health and wellbeing (SA Objective 8).

H.2.2.11 Many of Medway's heritage features are linked to its maritime heritage and are associated with its rivers or historic town centres. By directing growth towards town centres and waterfront locations, there is the potential for negative impacts on the setting of heritage assets. However, development and change also brings opportunities to enhance the settings and significance of heritage assets, particularly for built heritage, which may be currently underused or have been vacant for long periods. There is the potential for mixed positive and negative impacts on cultural heritage (SA Objective 9).

H.2.2.12 The spatial strategy seeks to provide a spatial strategy which supports improvements in transport infrastructure (including walking and cycling), which could potentially improve travel choice for existing and new residents. Additionally, the strategy describes that land will be safeguarded for a potential new passenger rail service connecting the Hoo Peninsula to the North Kent rail network, improving sustainable access to local and regional areas. However, the regeneration and development proposed in the strategy is likely to lead to an increase in the number of vehicle trips for private and commercial uses with possible adverse implications for Medway's congested road networks. Overall, there are likely to be mixed effects in relation to SA Objective 10.

H.2.2.13 The strategy seeks to support higher and further education with the aim of building a skilled local workforce, leading to potential for enhanced links between emerging high value employment businesses and local universities and colleges such as Medway University Technical College and MidKent College. A minor positive impact on education is identified (SA Objective 11).

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H.3 Natural environment

H.3.1 Policy S1: Planning for climate change

Policy S1: Planning for climate change

Development shall make demonstrable contributions to significantly progress to net zero carbon emissions by 2041.

Development must minimise the impact and mitigate the likely effects of climate change on existing and future communities and the environment and minimise the use of unsustainable resources.

The Council will require new built development, reflecting its scale and opportunities, to contribute to the mitigation of, and adaptation of climate change through:

Effective spatial planning and placemaking

- Directing the spatial strategy for growth to locations that provide better access to services, or which are capable of delivering improved services.
- Reducing the need for travel, through co-location of services and an accessible network of centres.
- Designing for walking and cycling, and providing for sustainable and low carbon transport choice.
- Designing for the wellbeing of people and wildlife, promoting public health and strengthening networks for nature.
- Directing the spatial strategy for growth to locations which avoid, or minimise, the need for additional engineered flooding solutions and allow nature based solutions for coastal and surface water flooding to help build resilience to the effects of climate change
- Existing surface water flow routes and drainage features within the site should be identified and preserved wherever these contribute to sustainable drainage, e.g. ditches, seasonally dry watercourses or historic ponds.

Mitigating the impacts of climate change

- Drive reductions in the carbon impacts of new development, including energy consumption, and the consideration of embodied carbon of materials and processes through whole life low carbon design.
- Maximising resource efficiency and sustainability in construction, and promoting the principles of the circular economy.
- Use of renewable and low carbon technologies in development.
- Provision of decentralised renewable energy and heating.

Adaptation to climate change

- Managing water resources, through efficiency measures and sustainable urban drainage measures.
- Provide resilience to the impacts of climate change in the design of development.
- Using multi-functional green and blue infrastructure to enhance biodiversity, manage flood risk, address overheating and promote local food production.
- Retention of existing trees and vegetation of value; and promoting an increase in tree canopy cover through the planting and establishment of new trees.
- Ensuring that development does not increase flood risk, including a sequential approach to avoid development in flood risk areas, by using Working with Natural Processes and/or Natural Flood Management techniques where possible.
- Reducing water consumption using water re-use measures including rainwater harvesting, surface water harvesting and/or grey water recycling systems. Personal water consumption per day for new

Policy S1: Planning for climate change

buildings should not exceed the Building Regulations recommended standard for water efficiency in water stressed regions.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S1	++	++	+	0	+	+	0	+	0	+	0	+

H.3.1.1 Policy S1 sets out the Council's plans for addressing climate change in the context of their net zero carbon by 2050 target. The policy considers how improvements can be made through effective planning, mitigation and adaptation.

H.3.1.2 Through effective spatial planning and placemaking, the Council seeks to provide development and growth in locations which will ensure good access to services and infrastructure, reducing travel distances and the need for private car use. The policy also aims to ensure new developments are designed with consideration for the wellbeing of residents, aiming for improved public health and wildlife through strengthening networks of multifunctional GI, incorporating walking and cycling links. Policy S1 is likely to achieve minor positive impacts for health and wellbeing and transport and accessibility (SA Objectives 8 and 10).

H.3.1.3 The provision of multifunctional GI, as advocated through the policy, will be likely to lead to enhancements for local biodiversity networks and nature recovery. Exploration of nature-based solutions for coastal and surface water flooding and water management as advocated through the policy will be likely to support biodiversity as well as resilience to climate change. A minor positive impact is identified for SA Objective 3.

H.3.1.4 Through seeking to maximise resource efficiency and implementing principles of the circular economy, including sustainable construction, the policy will be likely to result in a minor positive impact on pollution and waste, natural resources and the economy (SA Objectives 5, 6 and 12).

H.3.1.5 Policy S1 sets out the Council's plans for improved energy infrastructure, with use of renewables and low-carbon technologies, adapting to manage increased flood risk through a sequential approach to avoid development in flood-prone areas and through the use of multifunctional GI and overall reductions in the carbon impact of areas of new development.

H.3.1.6 Overall, Policy S1 has the potential for major positive impacts on climate change mitigation and adaptation (SA Objectives 1 and 2).

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H.3.2 Policy S2: Conservation and enhancement of the natural environment

Policy S2: Conservation and enhancement of the natural environment

The Council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy S3, Medway has Sites of Special Scientific Interest, a Marine Conservation Zone, the Kent Downs National Landscape, a National Nature Reserve, Local Nature Reserves, irreplaceable habitat, such as ancient woodland and salt marsh, Local Wildlife Sites and roadside nature reserves, which have particular significance for the protection of habitats and species.

The Council seeks to conserve, restore and enhance Medway's rich and diverse environmental assets, including statutory and non-statutory designated sites, priority habitat and species, and protected species, through the Local Plan. The Council will seek opportunities, including through development, to support the implementation of the Kent and Medway Local Nature Recovery Strategy to strengthen biodiversity and the wider natural environment.

Development will only be permitted where it demonstrates that it will protect and enhance the natural environment and biodiversity including the natural beauty of the landscape, all natural resources, habitats and species.

The Council promotes the conservation and enhancement of the Kent Downs National Landscape. The Council's additional requirements for development in or impacting on the Kent Downs National Landscape are set out in Policy S6.

Development should support the conservation, enhancement and restoration of biodiversity and geodiversity across the plan area. Planning decisions consider the importance of any affected habitats, species and features, and the integrity of linkages and networks for nature.

Development proposals will be required to demonstrate that significant harm to biodiversity can be avoided; if not, then adequately mitigated; or as a last resort, compensated.

Development proposals should seek opportunities to strengthen biodiversity networks and support the conservation objectives of biodiversity site management plans.

Development should safeguard features of the natural environment and nature conservation interest and make nature-based solutions part of the plans to tackle the climate emergency. Where there is an opportunity for river restoration enhancements, re-meandering, or the restoration of culverted watercourses to open channels, this should be actively pursued. If and where the watercourse is toe-boarded or engineered, opportunities for removal and restoration to a more natural state should be considered. There may be requirements for development to contribute to strategic environmental management and/or flood defence schemes to ensure an effective mitigation approach in particularly sensitive locations, such as in close proximity to designated sites and areas of significant flood risk, either now or in the future.

Sites of international importance for nature conservation

Where development has the potential for a likely significant effect on and SPAs, Special Areas of Conservation (SAC) or Ramsar site (and any other sites protected under the Habitats Regulations 2017 (as amended)), either alone or in-combination, it would only be permitted if it can demonstrate through a Habitats Regulations Appropriate Assessment that:

There will be no adverse impact upon the integrity of the designated site, taking into consideration the site's conservation objectives, either alone or in-combination with other plans and projects.

Adverse impacts on site integrity can be mitigated

Policy S2: Conservation and enhancement of the natural environment

Where the above cannot be met, development would only be considered if it meets requirements set out in the Habitats Regulations 2017 (as amended).

The Council's additional requirements for development with the potential for a likely significant effect on the North Kent Estuary and Marshes protected sites are set out in Policy S3, with specific consideration of recreational and urbanisation impacts.

Hoo Peninsula Strategic Environmental Programme

The Council will work in partnership with Natural England, environmental organisations and communities to establish and implement a strategic environmental programme on the Hoo Peninsula. This will provide a strategic approach to protecting designated sites, specifically Chattenden Woods and Lodge Hill SSSI, and the Medway Estuary and Marshes SPA, Ramsar site and SSSI. A coordinated programme of evidence-based measures will include land management and habitat restoration and creation, buffers to sensitive sites, securing the landscape, a nature-based approach to flood and water management, education and wardening, and provision of recreational resources away from sensitive locations. Developers of sites on the Hoo Peninsula will be required to contribute to the implementation of the strategic environmental programme, proportionate to the scale and nature of the development, and its proximity to sensitive sites.

Biodiversity Net Gain

The Council's policy follows national legislation and strategic guidance across Kent and Medway for Biodiversity Net Gain (BNG). Development proposals must demonstrate their contribution to enhancement of the natural environment, meeting national policy criteria, currently a measurable net gain of at least 10% in biodiversity. The Council's policy follows national legislation and strategic guidance across Kent and Medway. BNG should be designed to support the delivery of an identified biodiversity network, and provide enhancements for wildlife within the built environment. Where developers can demonstrate that they cannot provide policy compliant BNG on site, the Council will consider offsite delivery to deliver strategic enhancements, following the biodiversity gain hierarchy. This will support the Kent and Medway Local Nature Recovery Strategy in delivering on identified strategic opportunities, relevant supplementary guidance, or Medway based strategic environmental programmes. Where BNG is delivered offsite, developers will be required to demonstrate how they have considered delivery in Medway.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S2	+	+	+/-	+	+	+	0	0	0	0	0	0

H.3.2.1 Policy S2 sets out the policy protection of sites designated for their biodiversity interest, including statutory and non-statutory designated biodiversity sites. This includes policy support for the protection of European designated sites under the Habitats[1] and Birds[2] Directives. These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU, have become part of the National Site Network.

H.3.2.2 The policy outlines the mitigation hierarchy in relation to development proposals: to avoid, mitigate, and finally, compensate. Proposals which strengthen biodiversity networks and would contribute towards strategic environmental management programmes are supported. The policy requires development proposals to demonstrate at least 10% biodiversity net gain (BNG). The aspiration to deliver 10% BNG which is designed in accordance with the emerging Kent and Medway Local Nature Recovery Strategy, combined with other policy measures to ensure no adverse impact upon the integrity of European sites and to enhance biodiversity networks, has the potential to have a major positive impact on biodiversity across the Plan area. However, the package of mitigation measures under the Hoo Peninsula Strategic Environmental Programme is still in development. At this stage of the planning process, the assessment score is uncertain with regard to the impacts of development on European sites and SSSIs (SA Objective 3).

H.3.2.3 Policy S2 would protect areas of GI. Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), natural water management (climate change adaptation), filtration of air pollutants and the protection of ecologically valuable soil resources from erosion. The protection and enhancement of biodiversity features provided by this policy will be likely to help protect and enhance these essential ecosystem services within the Plan area. Additionally, the policy sets out requirements for development to contribute to strategic environmental management and/or flood defence schemes. Overall, this policy could potentially result in a minor positive impact on climate change mitigation, adaptation, pollution and natural resources (SA Objectives 1, 2, 5 and 6).

H.3.2.4 By seeking to protect designated and non-designated biodiversity sites, the policy has the potential to indirectly conserve the character of the landscape within and adjacent to such sites, leading to a minor positive impact on landscape character (SA Objective 4).

H.3.3 Policy S3: North Kent Estuary and Marshes designated sites

Policy S3: North Kent Estuary and Marshes designated sites
The North Kent Estuary and Marshes designated sites in Medway comprise the following: • Medway Estuary and Marshes SPA; • Medway Estuary and Marshes Ramsar; • Thames Estuary and Marshes SPA; • Thames Estuary and Marshes Ramsar; • Swale SPA; and

[1] Official Journal of the European Communities (1992). Council Directive 92 /43 /EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

[2] Official Journal of the European Communities (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

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Policy S3: North Kent Estuary and Marshes designated sites

- Swale Ramsar

The Council supports a strategic approach to managing recreational impacts on the North Kent Estuary and Marshes designated sites, arising from new development. New residential development within a 6km Zone of Influence from the North Kent Estuary and Marshes designated sites will need to make a defined tariff contribution to a strategic package of measures agreed by the North Kent SAMMS, 'Bird Wise' Board, or undertake their own Habitats Regulation Assessment with bespoke mitigation which must be agreed with Medway Council and Natural England.

Bird Wise will be reviewed on a regular basis to reflect proposed growth from all LPAs within the Zone of Influence.

Greater mitigation measures will be required for development within 16 metres of the designated sites, such as a setback intertidal flood defence and/or off-site mitigation where new salt marsh can be created.

New residential development for larger schemes outside of the 6km Zone of Influence may also need to secure appropriate mitigation and avoidance measures to offset any potential adverse effects arising from increased recreational pressure on the above listed designations (either 'alone' or 'in combination' with other relevant plans and proposals). This requirement will be determined in consultation with the Council and Natural England.

Development in proximity to the coastal designations, and associated functionally linked land has the potential for urbanisation impacts. All new development which is located within close proximity to the North Kent Estuary and Marshes designated sites (listed above) may also need to provide further mitigation measures to address urbanisation impacts, in addition to contributing to Bird Wise. Such proposals will be considered on a case-by-case basis by Natural England. All mitigation measures will be provided prior to occupation of development and delivered in perpetuity.

Development with potential for urbanisation effects which are located in close proximity to both designated sites and/or functionally linked land, identified through reference to the Impact Risk Zone consultation area, should be preceded by bird, invertebrate and habitat surveys to investigate whether these parcels of land (or adjacent land parcels of land) support a significant population of birds, invertebrates or plants, for which the North Kent Estuary and Marshes sites are designated or classified and whether each site plays an important role in maintaining or restoring the population of qualifying species at favourable conservation status. Surveys be undertaken in the appropriate survey season and following best practice methods. Outputs from these surveys will inform requirements for mitigation measures which may include the incorporation of screens, planting, bunds, fencing, directional lighting, and low noise emitting equipment among other solutions. The output of any bird/invertebrate/habitat surveys should input to master planning and ongoing monitoring should be implemented.

Project level applications should be supported by an HRA to ensure that development has no adverse impact on site integrity. All applications for development at the allocations set out should be accompanied with detailed noise assessments and lighting strategies and where necessary construction method statement and management plans should be put in place.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S3	+	+	+/-	+	0	+	-	0	0	0	0	-

H.3.3.1 Policy S3 sets out the policy support for the protection of the various North Kent Estuary and Marshes designated sites under the Habitats[3] and Birds[4] Directives. These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU, have become part of the National Site Network.

H.3.3.2 The policy sets out the key packages of mitigation measures in place in order to ensure no adverse impacts on the integrity of the European sites including the Strategic Access Management and Monitoring Scheme (SAMMS), also known as 'Bird Wise'. Furthermore, additional measures may be required where development sites lie in close proximity to designated sites.

H.3.3.3 Should the package of mitigation measures be agreed with Natural England, and subject to the findings of the HRA, Policy S3 would be anticipated to prevent adverse impacts on European sites (SA Objective 3) and a negligible impact is identified. At this stage of the planning process, while the package of mitigation measures under the Hoo Peninsula Strategic Environmental Programme is being refined and considered by Natural England, the assessment score is uncertain.

H.3.3.4 In providing protection for these important biodiversity sites, the policy would also serve to protect the distinctive character of the landscape within and surrounding the sites and have a minor positive impact on landscape character (SA Objective 4). The policy would also indirectly protect areas of wetland and associated vegetation and soils, which are likely to act as carbon storage features and provide natural water management, with the potential for a minor positive impact on climate change mitigation, climate change adaptation and natural resources (SA Objectives 1, 2 and 6).

H.3.3.5 There is the potential for the policy to have a minor negative impact on the delivery of housing (SA Objective 7) and employment (SA Objective 12) by restricting the locations and/or quantities of development and requiring financial contributions from such development to mitigate potential adverse impacts on European sites.

[3] Official Journal of the European Communities (1992). Council Directive 92 /43 /EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

[4] Official Journal of the European Communities (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

H.3.4 Policy S4: Landscape protection and enhancement

Policy S4: Landscape protection and enhancement

The Council attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, the role of the river and estuaries in Medway's identity, and the intrinsic character and beauty of the countryside, in containing urban sprawl and retaining the separation of settlements.

Development should seek to conserve and enhance Medway's rural and urban landscape character and local distinctiveness, and reflect the diversity and importance of Medway's landscapes, including the Kent Downs National Landscape and the North Kent Marshes, and their landscape settings.

Development should retain the separation of settlements and be directed towards areas of lower landscape sensitivity, with the objective of restoring lost landscape distinctiveness. New landscaping should be of high quality in order to enhance the existing landscape in which it is located.

Development proposals should demonstrate how they respect and respond to the character, key sensitivities and qualities of the relevant landscape character areas, as detailed in the Medway Landscape Character Assessment and other appropriate design guidance, including the Kent Downs Landscape Design handbook, where relevant, to ensure that distinctive character is maintained through protection, conservation, restoration and enhancement. This involves consideration of key characteristics and visual attributes including:

- Landform, topography and natural hydrological patterns
- Land use pattern and composition. Nature of field boundaries
- Pattern, distribution and nature of settlements, roads and footpaths. Vernacular building materials
- Extent, location and composition of woodland and tree cover
- Characteristic and important views
- Distribution, type and composition of wildlife habitats
- Time depth - the presence and pattern of historic landscape features
- Distribution and type of designations (landscape, historic and wildlife)
- Aesthetic and perceptual factors (including darkness and tranquillity)

Development will be permitted in and alongside the undeveloped coast, only if:

- a coastal location is essential and no suitable alternative site exists along the developed coast.
- the scenic, heritage or scientific value and character of the undeveloped coast is maintained and, where appropriate, and consistent with Policy S3, public access to the coast is improved.
- Contributes positively to the enhancement, restoration or creation of landscapes

Where there are opportunities to improve these environments, there should be a commitment to actively pursue these aims. This is consistent with BNG requirements, Policy S2 and S3, and the vision set out in The Kent Nature Partnership Biodiversity Strategy 2020-2045.

Development proposals will be required to demonstrate that they will enhance, restore or create landscapes. Proposals which seek to provide appropriate landscape enhancement and green infrastructure at a strategic scale will be welcomed where they represent sustainable development.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S4	+	+	+	++	0	+	0	+	+	0	0	0

H.3.4.1 Policy S4 sets out the approach to the protection of Medway's distinctive landscapes and townscapes. The policy directs development to areas of lower landscape sensitivity and sets out the protection of areas identified as 'undeveloped coast'. The policy states that development proposals will be required to "*demonstrate that they will enhance, restore or create landscapes*", including respecting and responding to the findings of the Medway Landscape Character Assessment. The policy has the potential to have a major positive impact on the landscape and townscape objective (SA Objective 4).

H.3.4.2 By seeking to conserve and enhance the landscape and its features, including where this can link to BNG requirements and the Kent Nature Partnership Biodiversity Strategy, the policy is likely to lead to the protection of green and blue infrastructure (such as woodlands, hedgerows, grasslands and watercourses), leading to a minor positive impact on associated biodiversity and geodiversity (SA Objective 3). GI and soils can also act as carbon stores and serve natural water management functions. In protecting these features, the policy has the potential to have a minor positive impact on climate change mitigation and adaptation (SA Objectives 1 and 2) and natural resources (SA Objective 6).

H.3.4.3 By seeking to protect and enhance landscapes, the policy has the potential to protect attractive landscapes close to where people live and encourage outdoor recreation, with its associated health benefits. The policy therefore has the potential to have a minor positive impact on health and wellbeing (SA Objective 8).

H.3.4.4 By protecting and enhancing the key characteristics of the landscape, this policy has the potential to have a minor positive impact on the historic environment and the setting of cultural heritage features (SA Objective 9).

H.3.4.5 **Recommendation:** The policy could be strengthened by cross-referencing to the specific evidence that identifies areas of lower landscape sensitivity.

H.3.5 Policy S5: Securing strong green and blue infrastructure

Policy S5: Securing strong green and blue infrastructure

The Council will conserve and enhance the network of green and blue infrastructure across rural and urban Medway. The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a Special Protection Area, Ramsar site and/or Special Area of Conservation, or candidate sites, and those of the Kent Downs National Landscapes. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland.

The Council is committed to protecting Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves, including from source pollution.

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Policy S5: Securing strong green and blue infrastructure

Wider components of the green infrastructure network will be protected and enhanced in line with the analysis and strategy set out in the Medway Green and Blue Infrastructure Framework and the Kent and Medway Local Nature Recovery Strategy, recognising the importance of wider natural assets and connections for wildlife and people.

The Council supports the Green Infrastructure Principles set out in Natural England's Green Infrastructure Framework. Reflecting scale and context, new development must provide for multifunctional, varied, connected and accessible green infrastructure that reflects local character and supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, recognition and management of heritage features, recreation, positively benefits health and wellbeing, and seeks opportunities to strengthen the resilience of the natural environment. Major new development proposals will be expected to submit a Green Infrastructure Plan as part of a Design and Access Statement setting out how will meet policy/objectives/GI principles. In this way, the Plan will work to achieve the requirements within the Green Infrastructure Standards for developments.

The Council will expect development proposals to demonstrate that they are designed to be resilient to, and can adapt to, the future impacts of climate change, in strengthening ecological networks. Opportunities to retro-fit this to existing urban areas should be maximised.

The Council recognises the importance of green corridors for wildlife resilience, connectivity and providing landscape buffers. Development should be designed to protect and enhance existing habitats and ecological networks, including wildlife corridors and stepping stones. Development should minimise any potential disturbance to species and habitats, for example from site lighting, air pollution, noise. This policy should be read in conjunction with requirements in strategic allocation policies.

Opportunities will be sought to promote and enhance the public rights of way network, including national trails, long distance paths and the wider footpath network, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside, and other cross border links. Where appropriate to the proposed development, there should be consideration of the Rights of Way Improvement Plan, Local Walking and Cycling Improvement Plan and the Medway River Strategy.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S5	+	+	+	+	+	+	0	+	+	+	0	0

H.3.5.1 Policy S5 seeks to protect existing components of green and blue infrastructure in Medway for their value as a multifunctional network. The policy states that the highest level of protection will be given to designated sites of international ecological importance and the Kent Downs National Landscape (NL), and a high level of protection to SSSIs and ancient woodlands, as well as protection for Regionally Important Geological Sites (RIGS), Local Nature Reserves (LNRs) and Local Wildlife Sites (LWS). Other GI features will be protected and enhanced in accordance with the Medway Green and Blue Infrastructure Framework.

H.3.5.2 The policy states that new development must provide GI that meets the functional requirements set out in the policy, including "*successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation, positively benefits health and wellbeing, and seeks opportunities to strengthen the resilience of the natural environment*".

H.3.5.3 GI is a cross-cutting theme, and related policies have the potential to influence a number of sustainability criteria.

H.3.5.4 By protecting existing GI and seeking to increase the quantity of GI in new developments the policy has the potential to mitigate the effects of climate change by protecting and enhancing carbon sinks, including vegetation and soils. A minor positive impact is identified for climate change mitigation (SA Objective 1).

H.3.5.5 Green and blue infrastructure is likely to include features that contribute to natural water management, such as vegetation and soils. The policy also requires development proposals to "*demonstrate that they are designed to be resilient to, and can adapt to, the future impacts of climate change, in strengthening ecological networks*". There is the potential for the policy to have a minor positive impact on climate change adaptation (SA Objective 2).

H.3.5.6 In seeking to protect ecologically designated sites in relation to their role in the GI network, and by seeking to provide new GI associated with development proposals which fulfils ecological functions and protects existing habitat corridors, the policy has the potential to have a minor positive impact on biodiversity and geodiversity (SA Objective 3).

H.3.5.7 By protecting and enhancing GI, the policy is likely to provide opportunities to retain and improve the character and appearance of the local landscape and townscape. A minor positive impact on landscape and townscape will be likely (SA Objective 4).

H.3.5.8 GI can serve to filter air pollutants. By retaining and enhancing these features, as well as the intention to protect biodiversity/geodiversity designations from source pollution, the policy has the potential to have a minor positive impact on pollution and waste (SA Objective 5).

H.3.5.9 By seeking to retain GI and associated soils, the policy has the potential to have a minor positive impact on natural resources (SA Objective 6).

H.3.5.10 The policy seeks to "*promote and enhance the public rights of way network*", improve connectivity and extend access along the river and across the authority boundary. The policy could provide greater opportunities for active recreation and travel and improve access to the countryside, leading to a potential minor positive impact on health and wellbeing and access to sustainable transport (SA Objectives 8 and 10).

H.3.5.11 The policy states, "*new development must provide for multifunctional, varied, connected and accessible green infrastructure that supports the … management of heritage features*". By seeking to protect GI and specifically referencing heritage features, the policy has the potential to have a minor positive impact on protecting and enhancing the setting of heritage features (SA Objective 9).

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H.3.6 Policy S6: Kent Downs National Landscape

Policy S6: Kent Downs National Landscape

National Landscapes have the highest status of landscape protection. Medway includes land in the Kent Downs National Landscape. This will be conserved and enhanced in accordance with the enhanced Section 85 of the Countryside and Rights of Way Act landscape duty.

Development in the National Landscape, and within its setting, must demonstrate that it meets the aims of the Kent Downs AONB National Landscape Management Plan and associated supporting relevant policy guidance. The design scale, setting and materials should be appropriate to the National Landscape. Major development within the National Landscape will only be permitted in exceptional circumstances and where it can be demonstrated that it is in the public interest.

Other development within the National Landscape and its setting, including that which will affect views to and from the designated landscape, will be permitted provided that:

a. the location, form, scale, materials and design would conserve and enhance the character of the landscape; and

b. the development would conserve and enhance the special qualities, distinctive character and tranquillity of the National Landscape and avoids adverse impacts , unless these can be satisfactorily mitigated ; and

c. the development furthers the delivery of the Kent Downs AONB National Landscape Management Plan and having regard to any associated guidance.

Actions to conserve and enhance the National Landscape shall be informed by landscape assessment, having considered any relevant landscape character appraisals and shall focus upon:

a. landscapes and features relating to the proposals, especially those supporting National Landscape designation, including the scarp slope dramatic landform and views, dry valleys, woodlands, biodiversity-rich habitats, farmed landscapes, pastoral scenery, villages, historic and cultural heritage, geology and natural resources;
b. locally distinctive patterns and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies;
c. the locally distinctive character of buildings, settlements and their landscape settings, including the transition between man-made and natural landscapes at the urban fringe;
d. visually sensitive skylines, geological and topographical features;
e. landscapes of cultural, historic and heritage value;
f. important views and visual amenity; and
g. relative tranquillity and remoteness and the need to avoid intrusion from light pollution, noise, and motion.

Opportunities to restore and enhance the special characteristics and natural capital of the Kent Downs National Landscape, particularly at a landscape scale will be encouraged.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S6	+	+	+	++	0	+	0	+	+	0	0	0

H.3.6.1 Policy S6 sets out the policy measures relating to the Kent Downs AONB / NL, which is also protected by legislation and national planning policy. The policy requires development proposals within the NL and its setting to conserve and enhance the natural beauty of the landscape. The policy also makes reference to conserving and enhancing the "*special qualities, distinctive character and tranquillity*" of the landscape, ensuring consideration of important views, and supporting the delivery of the Kent Downs Management Plan and other policy guidance prepared by the National Landscape Unit. The policy is likely to have a major positive impact on landscape and townscape (SA Objective 4).

H.3.6.2 By protecting the natural beauty of the NL and its special qualities, the policy is likely to lead to the protection of green and blue infrastructure (such as woodlands, hedgerows, grasslands and watercourses) and associated habitats, ecological links and geological features. A minor positive impact on biodiversity and geodiversity is identified (SA Objective 3). GI and soils are also likely to act as carbon stores and serve natural water management functions. In protecting these features, the policy has the potential to have a minor positive impact on climate change mitigation and adaptation (SA Objectives 1 and 2) and natural resources (SA Objective 6). The policy also seeks to minimise light and noise pollution and protect tranquillity; a negligible impact is therefore recorded for SA Objective 5.

H.3.6.3 The Kent Downs NL is crossed by numerous public rights of way (PRoW), including the North Downs Way national trail. By seeking to conserve and enhance this landscape, the policy has the potential to protect attractive landscapes close to where people live and encourage outdoor recreation, with associated health benefits. The policy has the potential to have a minor positive impact on health and wellbeing (SA Objective 8).

H.3.6.4 By protecting and enhancing the key characteristics of the landscape, this policy has the potential to have a minor positive impact on the historic environment and the setting of cultural heritage features (SA Objective 9).

H.3.7 Policy DM1: Flood and water management

Policy DM1: Flood and water management

The Council seeks to reduce flood risk, promote water efficiency measures, and protect and enhance water quality. The functional floodplain is defined in the latest Strategic Flood Risk Assessment.

Flood Risk Management

Medway Council will manage flood risk first by avoiding, so far as possible, development sites in current and future medium and high flood risk areas, considering all sources of flooding, including areas at risk of surface water flooding.

To do this they have used the Strategic Flood Risk Assessment to inform the Local Plan development sites and demonstrate the application of the Sequential Test. For those development sites which have passed the Sequential Test, the proposed development must pass the Exception Test as per the National Planning Policy Framework guidance. As part of this Test, they must:

- Submit site-specific flood risk assessments in particular locations, including those at risk from sources other than river and sea flooding;
    - Requiring that development is safe throughout its lifetime without increasing flood risk elsewhere and, where possible, have a positive impact on flood risk
    - Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted unless it can be suitably mitigated.

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Policy DM1: Flood and water management

- Where development passes the sequential and exception tests, finished floor levels should be raised above the design flood level and include the Environment Agency's recommended additional freeboard requirements.
- Investigate measures to control the risk of flooding affecting the site.
- Implement further management measures to deal with any residual risk remaining after avoidance, control and mitigation have been utilised.
- Flood Hazard should be appraised against the proposed development layout to ensure that users and occupants of the site can achieve safe access and egress.
- Using site layout to locate the most vulnerable aspects of development in areas of lowest flood risk.

- Where flood risk management infrastructure is required to address flood risk, all development should:
  - Liaise with the Flood risk management authorities to identify and deliver flood risk management schemes to manage flood risk to existing communities and future development sites. This specifically would include the Environment Agency's Medway Estuary and Swale (MEAS) and the Thames Estuary 2100 programmes
  - identify how this infrastructure will be operated, funded and maintained for the lifetime of the development;
  - ensure there is space for future maintenance or new flood risk management infrastructure
  - consider the consequences of flood risk management infrastructure failing or its design standard being exceeded;
  - Identify the legal requirement under the Habitat Regulations (2019) to provide compensatory habitat associated with sea level rise and the process known as coastal squeeze.
  - The Environment Agency's MEAS programme is delivering habitat compensation schemes to provide intertidal compensatory habitat. This is required as flood defence improvements and sea level rise is expected to cause losses to existing to designated Special Protection Areas and Ramsar sites within the Medway Estuary and Swale area.
  - Contribute towards the Environment Agency's flood risk management programme to support:-
    - the delivery of flood risk management schemes which will provide indirect benefits such ensuring the strategic infrastructure which supports development including road, rail, utilities, employment areas and other essential services.
    - habitat creation / compensation works required to offset the impact of flood defence improvements and sea level rise squeezing out existing designated intertidal habitat. This is required under the Conservation of Habitats and Species Regulations (2019).

Medway Council will identify an appropriate mechanism such as planning obligations / S106 agreements, or other approaches to support flood risk works under the MEAS and TE2100 programmes.

Adaptation to Climate Change

Development must be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures. These measures could include:

- Incorporating water efficiency measures, such as the use of grey water and rainwater recycling and low water use sanitary equipment.

Policy DM1: Flood and water management

- Minimising vulnerability to flood risk by locating development in areas of low flood risk (making allowances for climate change) and including mitigation measures including SuDs (in accordance with SuDs policy above).
- Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading.
- Measures to protect and enhance rivers as a valuable resource for wildlife and biodiversity, blue infrastructure and climate change resilience. Development should not encroach within a minimum of 16m to tidal main rivers, unless justified by evidence at planning application stage, and agreed in consultation with the Environment Agency. Appraising and mitigating the risks of climate change on flooding in site specific flood risk assessments.

Water Supply

- Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource, and it does not put at risk the ability to maintain a public water supply. Proposals must have regard to the Water Resources Management Plans published by South East Water and Southern Water.
- Development within these areas will only be permitted provided suitable risk assessments are included, which outline that the development has no adverse impact on the quality of groundwater resources and does not put at risk the ability to maintain a public water supply.

Wastewater/Foul water drainage

- Development proposals must ensure that adequate wastewater infrastructure is available in tandem with the development, which are also resilient to the impacts of climate change. Proposals where appropriate must comply with Policy T36.
- Private, non-mains foul drainage systems are not environmentally acceptable within publicly sewered areas. Planning applications must demonstrate that connection to the public sewer is feasible and any mitigating measures necessary to enable a connection must be identified and agreed between the applicant and the sewerage undertaker.
- If a non-mains drainage solution is proposed, an applicant must demonstrate that it is not practicable to connect to the public sewer. Sufficient information to understand the potential implications for the water environment of non-mains drainage must be submitted, including the Environment Agency's Foul drainage assessment form (FDA1). The hierarchy of non-mains alternative solutions must be followed:
    - package sewage treatment plants (which may be offered to the sewerage undertaker for adoption) where effluent goes through a wetland prior to discharge into the watercourse/ground as that will improve water quality; then
    - septic tanks; then
    - in the last instance, a cesspool if no other solution is possible.

Water quality and groundwater protection

- All new development should have regard to the actions and objectives of appropriate River Basin Management Plans (in Medway, this is the Thames River Basin District) in striving to protect and improve the quality and resources of water bodies in and adjacent to the district. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary.

Sustainable Urban Drainage

Policy DM1: Flood and water management

- Existing surface water flow routes and drainage features within the site should be identified and preserved wherever these contribute to sustainable drainage e.g. ditches, seasonally dry watercourses or historic ponds.
- To minimise the risk of sewer flooding and protect water quality, surface water will not be permitted to discharge to the foul or combined sewer network.
- For infiltration SuDS within source protection zones, as part of their planning application, developers should provide evidence of having consulted the statutory water company responsible for the SPZ, to confirm the proposed SuDS design is appropriate to this sensitive hydrogeological location.
- Development should utilise SuDs and replicate Greenfield runoff rates, where possible, and volumes.
- Surface water runoff must be managed as close to source as possible and be guided by relevant national (and/or) local standards and guidance.
- All major or non-major (identified within a Sensitive Drainage Area by Level 1 SFRA) development will require a Surface Water Management Strategy (SWMS) with an accompanying SuDs proforma to be produced to show how SuDs will be included to manage surface water runoff from the site.
- Arrangements must be put in place for the long-term management and maintenance of SuDs.
- Drainage should be designed and implemented in ways that deliver other policy objectives of this plan, including water use efficiency, water quality, biodiversity, amenity and recreation and Green Infrastructure.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM1	+	++	+	+	+	+	0	+	0	0	0	+

H.3.7.1 Policy DM1 sets out the requirements for water management in relation to development in the Plan area. The policy seeks to manage flood risk and surface water, ensure flood defences are not compromised by development, manage water quality and considers measures relating to water and sewerage resources for new development at present and in future with regard to climate change.

H.3.7.2 The policy requires development layouts to apply the sequential approach to ensure that the appropriate uses are located in areas at greater flood risk and that safe access can be maintained. The policy requires all developments to use Sustainable Drainage Systems (SuDs) to manage surface water, where possible. All major development proposals and some minor development proposals are to be accompanied by a Surface Water Management Strategy. The requirements of the policy would help ensure that future development proposals would not place new residents at an increased risk of flooding or exacerbate flood risk in surrounding areas. In line with the Thames Estuary 2100 Plan[5], the policy will seek to adapt to and manage tidal flood risk in response to climate change and estimated sea level rise. In the Medway area this includes the raising of tidal flood defences, with continuing inspection, maintenance, repair and replacement of them. Overall, a major positive impact on climate change adaption would be anticipated (SA Objective 2).

H.3.7.3 The policy also requires new development to consider incorporating water efficiency measures and optimising the use of multi-functional GI including tree planting for urban cooling, local flood risk management and shading. By reducing water use in new homes, these measures have the potential to reduce GHG emissions associated with water treatment. Tree planting will serve to create a carbon store in the longer term as well as having urban cooling effects. Policy DM1 has the potential to have a minor positive impact on climate change mitigation (SA Objective 1).

H.3.7.4 Flooding can pose a number of risks to human health and wellbeing, including physical and mental trauma, disease and disruption to power and water supplies[6]. Providing new development which is flood resilient and does not exacerbate flood risk in surrounding areas will be expected to have minor positive impacts on health and wellbeing (SA Objective 8). By locating new employment development in areas at lower risk of flooding, there would also be anticipated to be indirect minor positive impacts on the economy through reduced interruption economic activities as a consequence of flooding (SA Objective 12).

H.3.7.5 The policy requires development to have regard for the actions and objectives of the Thames River Basin Management Plan (RBMP) "*in striving to protect and improve the quality of water bodies in and adjacent to the district"* and states that *"Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary*". The incorporation of SuDS into developments would also be expected to benefit water quality. The policy has the potential to have a minor positive impact on pollution (SA Objective 5).

[5] DEFRA and Environment Agency (2023) Thames Estuary 2100. Available at: https://www.gov.uk/government/collections/thames-estuary-2100-te2100#map-and-policy-units [Date accessed: 03/03/25]

[6] Public Health England (2014) Flooding and the public's health: looking beyond the short-term. Available at: https://publichealthmatters.blog.gov.uk/2014/01/06/flooding-and-the-publics-health-looking-beyond-the-short-term/ [Date accessed: 03/03/25]

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H.3.7.6 The design of SuDs features can bring multifunctional benefits, including enhancements to biodiversity, recreational opportunities and amenity. The policy requires SuDs features to be designed to deliver other plan objectives, which could help to deliver development in line with the priorities of the Medway Green and Blue Infrastructure Framework. Policy DM1 will be likely to have a minor positive impact on biodiversity and landscape and townscape (SA Objectives 3 and 4).

H.3.7.7 **Recommendation:** In line with the Environment Agency's advice, the policy could be enhanced through setting out measures to ensure the deterioration of water quality is prevented from any possible source. Cross-referencing to the requirements of the latest Drainage and Wastewater Management Plan could strengthen the policy in this regard.

H.3.8 Policy DM2: Contaminated land

Policy DM2: Contaminated land

All contaminated land will be remediated prior to development and/or during construction to an appropriate level to its proposed use. Investigations and assessments of all sites situated on or in close proximity to potentially contaminated land will be required in conjunction with relevant development proposals and a preliminary risk assessment (PRA) should be submitted at the earliest opportunity. This will identify potential risks to human health and the environment and where relevant, inform remedial measures and future monitoring to mitigate and monitor the risk. All investigations should be carried out in accordance with legislation, such as part 2A of the Environmental Protection Act, Building Regulations, and complying with established procedural guidelines. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development will rest with the developer and/or landowner.
Source Protection Zones must be considered when assessing potential environmental pollution risks, particularly those which may pose a risk to groundwater. This includes proposals that have the potential to release hazardous substances to ground, involve effluent discharge to ground or will physically disturb an aquifer.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM2	0	0	+	0	+	+	+	+	0	0	0	0

H.3.8.1 Contaminated land could lead to adverse effects on biodiversity and human health due to the spread of toxins once 'locked' in the ground. Development on unstable land could lead to erosion of material which could pollute nearby water courses and has the potential to damage infrastructure and affect human health.

H.3.8.2 It is assumed that the level and types of contamination on sites allocated for development will be capable of remediation without affecting the viability of the development.

H.3.8.3 Policy DM2 sets out the need for contaminated land to be remediated in association with future development proposals to ensure no significant adverse impacts on human or ecological receptors. Furthermore, the policy requires source protection zones (SPZs) to be considered when assessing potential environmental pollution risks, which can help to reduce impacts on groundwater quality.

H.3.8.4 The policy has the potential to lead to the remediation of pollution on development sites and a reduction in the potential exposure of receptors, which could have a minor positive impact on biodiversity, pollution and waste and health and wellbeing (SA Objectives 3, 5 and 8).

H.3.8.5 By seeking to facilitate the redevelopment of previously developed sites, the policy has the potential to have a minor positive impact on the efficient use of land (SA Objective 6) and the delivery of housing, particularly in urban regeneration locations (SA Objective 7).

H.3.9 Policy DM3: Air quality

Policy DM3: Air quality

The Council seeks to reduce exposure to areas of poor air quality, maintain areas of good air quality, and where possible improve air quality through restricting development or requiring acceptable and effective mitigation measures. It also seeks to protect designated habitats from the impacts of air quality on ecology.
Proposed developments which have the potential to negatively impact on air quality will be expected to be accompanied by air pollution impact assessments and mitigation measures, in accordance with local air quality guidance.
All proposals should take account of the Medway Council Air Quality Planning Guidance that sets out a screening checklist for major size development and proposed development within, or close to an AQMA. Depending on the scale of development, the council may require the submission of an Air Quality Assessment and/or an Emissions Mitigation Assessment.
The guidance also advocates mitigation measures for all development and all development will be expected to maximise opportunities to improve local air quality through appropriate design. This includes installation of electric charging points and the introduction of low nitrogen oxides (NOx) boilers. Where mitigation is not integrated into a scheme, the Council will require this through a planning condition(s). If on-site mitigation is not possible, then the Council may seek contribution to wider air quality mitigation measures through a planning obligation, but this approach will not be acceptable where there remains an adverse impact upon sensitive neighbouring uses.
Proposals must be consistent with policy S4 through the consideration of air quality to conserve the natural environment.
Development with the potential to cause air quality impacts as a result of emissions to air, such as from traffic, industrial emissions, on the ecology of designated sites will be required to demonstrate avoidance or appropriate mitigation.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM3	0	0	+	0	+	0	0	+	0	0	0	0

H.3.9.1 Air pollution is a significant concern internationally and locally. Policy DM3 seeks to reduce the impacts of poor air quality on human and ecological receptors. Development proposals must take account of the Medway Council Air Quality Planning Guidance that sets out a screening checklist for development in relation to air quality assessments. An Air Quality Assessment and/or an Emissions Mitigation Assessment may be required. The guidance sets out those circumstances where a recommendation for refusal of planning permission may be appropriate if impacts on air quality cannot be acceptably mitigated. Therefore, the policy and guidance document have the potential to have a minor positive impact on pollution and waste (SA Objective 5), biodiversity (SA Objective 3) and the health and wellbeing of local residents (SA Objective 8).

H.3.10 Policy DM4: Noise and light pollution

Policy DM4: Noise and light pollution

Development which generates noise and light pollution, likely to cause significant adverse impacts to health and quality of life, or significant adverse impacts to the natural environment and ecology, will only be acceptable where it can be demonstrated that adequate mitigation has been incorporated into the scheme.

It must be demonstrated that;

1. There are no adverse impacts to sites of nature conservation, protected habitats, other vulnerable species, and the Kent Downs National Landscape.
2. There is no adverse impact on residential amenity and the character of the surroundings,
3. Where appropriate, technology and efficiency measures, such as motion sensors, LED lights, or use of light spectrum colours, have been incorporated into the design to reduce levels of noise and light, or negative impacts.

The format and range of evidence required to demonstrate the above will need to be agreed with the case officer on a case by case basis to reflect the uniqueness of each proposal.

A Landscape and Visual Impact Assessment will be required for proposed developments within the Kent Downs National Landscape, North Kent Marshes or an SSSI.

Proposals must be consistent with policy S2 through the mitigation of noise and light pollution to conserve the natural environment.

Planned development, either through an extant planning permission or allocated in the Local Plan, must be considered.

Noise

Where noise levels are known to be high, development proposals which are noise sensitive will need to demonstrate adequate mitigation to support a good quality of life and health for all.

Light

Policy DM4: Noise and light pollution

Proposed development that includes external lighting, or requires external lighting in connection with its operation, will be acceptable provided they demonstrate that it has been designed to minimise light glare, light trespass, light spillage and sky glow and is lit to the minimum amount necessary to achieve its purpose.
Major developments with specific lighting requirements or for those that are in or adjacent to sensitive locations will require a lighting strategy. Impact on protected species and habitats will be a key consideration to ensure there is no detrimental impact or unacceptable harm.
External lighting must comply with the Institution of Lighting Professionals standards.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM4	0	0	0	0	+	0	0	+	0	0	0	0

H.3.10.1 Policy DM4 refers to the issue of noise and light pollution associated with development. This policy aims to ensure that *"adequate mitigation has been incorporated"* where development could result in noise and light pollution which leads to associated adverse impacts to health and quality of life. The policy would help to ensure that sources of pollution or disturbance are addressed, and that technology is incorporated to reduce light and noise levels. Therefore, the policy and guidance document have the potential for a minor positive impact for pollution (SA Objective 5) and wellbeing (SA Objective 8).

H.3.10.2 Policy DM4 demonstrates the Council's aim to ensure there are *"no adverse impacts to sites of nature conservation and/or protected habitats and other vulnerable species and the Kent Downs National Landscape"* and *"no adverse impacts on residential amenity and the character of the surroundings"* and hence reduces the potential for negative effects with regard to biodiversity and geodiversity and the local landscape. Therefore, this aspect of the policy will be likely to result in a negligible impact for SA Objectives 3 and 4.

H.3.11 Policy S7: Green Belt

Policy S7: Green Belt

The Council recognises the important function of Green Belt at a local and strategic scale, in managing against urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.
The Council has reviewed the Green Belt boundary under the Duty to Cooperate with Gravesham Borough Council establishing exceptional circumstances for Green Belt release and accommodating the release of land west of Strood (Policy SA6) to accommodate sustainable growth. The updated boundary is shown on the policies map.
There will not be inappropriate development in the Green Belt.
The Council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

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	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S7	+	+	+	+	0	+	+	+	0	0	0	0

H.3.11.1 Green Belt designation applies to approximately 5% of the Medway Plan area. The designated land is part of the wider Metropolitan Green Belt surrounding Greater London. The principal objectives of Green Belt designation are to maintain openness and to restrict urban sprawl. The measures in place to protect the Green Belt are set out in the NPPF[7].

H.3.11.2 The NPPF sets out the five purposes of the Green Belt:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict or other urban land.

H.3.11.3 In Medway, the Green Belt occupies a peripheral location to the west of the Plan area. One site allocation has been identified in this area, informed by a Green Belt Assessment, which will contribute towards meeting Medway's housing needs (SA Objective 7). See evaluation of Policy SA6 in **Appendix K**.

H.3.11.4 In the remaining Green Belt locations, the policy is likely to indirectly lead to the protection of GI assets (such as vegetation and soils) that may provide water management and carbon storage functions. There is the potential for indirect minor positive impacts on climate change mitigation, climate change adaptation and natural resources (SA Objectives 1, 2 and 6).

H.3.11.5 Green Belt is not a reflection of the environmental quality or value of the land, however, by maintaining land as permanently open, the designation can lead to the indirect effect of protecting the countryside, including features such as trees and hedgerows and associated biodiversity and amenity value. Policy S8 therefore has the potential to have a minor positive impact on biodiversity, landscape and townscape (SA Objectives 3 and 4).

H.3.11.6 The purposes of the Green Belt also seek to encourage urban regeneration and prevent urban sprawl and the coalescence of settlements. By encouraging the revitalisation of town centres and maintaining the separate identities of communities, a minor positive impact could be achieved in terms of community cohesion, with benefits to wellbeing (SA Objective 8).

[7] MHCLG (2024) National Planning Policy Framework, December 2024. Available at https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [Date accessed: 03/03/25]

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H.3.11.7 While the purposes of the Green Belt include the protection of the setting and special qualities of historic towns, the Medway Green Belt Review states that this purpose is rarely found in practice as historic town centres are often surrounded by more recent development and separated from the Green Belt. The impact on cultural heritage has therefore been assessed as negligible (SA Objective 9).

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H.4 Built environment

H.4.1 Policy T1: High Quality Design and Amenity

Policy T1: High Quality Design and Amenity

Development in Medway will be expected to be of high-quality design that makes a positive contribution and respond appropriately to the character and appearance of its surroundings.

All proposals for development will be required to satisfy the following criteria, as applicable to the type of development proposed, and consideration of the criteria should be demonstrated in supporting statements and reports submitted with an application. It is expected that any departure from this policy, including its individual criterion, must be robustly justified in information submitted in support of the application:

Design, character and site context

- High quality place making, distinctiveness and character, through the scale and form of development that responds positively and respectfully to its surrounding context and sensitively corresponds with key characteristics and interpretations of Medway.
- Demonstrates, through compliance with relevant design guides and codes, how it relates to and/or reinforces local distinctiveness and character through the use of appropriate morphologies, streetscapes, public realm, landscapes, architecture and detail. Details should include the consideration of high-quality materials, local vernacular materials where appropriate; building, public realm and landscape detailing.
- Interpret appropriately the prevailing pattern of plot size and layout relating to the surrounding context position within proposed fabric / edge conditions.
- Be appropriate in terms of mass, bulk, height and roofscapes in relation to the surrounding context and views into and out from the site. Shall be compliant with the building heights / views policies, Landscape and Visual Impact Assessment (LVIA) / Townscape and Visual impact assessments (TVIA) methodologies and best practice for neutral analysis of the impacted context as a baseline for understanding the site.
- Achieves a transition from urban to rural for edge of settlement sites that reinforces distinctiveness and respects appropriate scale, has regard to field patterns and existing landscape features, achieves separation to avoid coalescence, focusses distribution of higher densities fabrics towards centres / inner edges.
- Demonstrated opportunities to align with Medway Council's corporate strategies including child friendly environments, climate emergency, health and wellbeing, and culture.
- Makes efficient use of land and is guided by a clear set of design principles that comply with the National Model Design Code / National Design Guide ten characteristics of well-designed places in conceptual work and pre-app engagement.
- The Council would expect compliance with the principles of nationally recognised standards, so far as practicable, across all proposed new developments.

Water/flooding

- Existing surface water flow routes and drainage features within the site should be identified and preserved wherever these contribute to sustainable drainage and/or works with nature, e.g. ditches, seasonally dry watercourses or historic ponds.

Accessibility

Policy T1: High Quality Design and Amenity

- There is good connectivity and permeability that supports existing and new Public Rights of Ways. active travel and provides a clear user hierarchy for pedestrians, cycles, public transport before cars, ensuring streets and spaces within new developments are not overly car dominated particularly in residential developments;

Landscape, trees and amenity

- Considers nature from the outset and works with the topography of the site and the inventive incorporation / use / interpretation of existing natural features.
- Retains existing trees and landscape features and incorporates new high quality landscaping and areas of public realm that make use of / or retain features of relevance / importance.
- Demonstrate integration of SUDs within landscape as areas of shallows sided dual use wherever possible and clear demonstration of linkages / contribution toward green infrastructure assets and networks;
- It establishes tree-lined streets, new trees and other landscape features such as hedges that collectively help create an attractive, welcoming, and healthy place to live, work and visit and contributes toward eco-system benefits in support of climate change and sustainability.

Amenity and inclusivity

- Provides a suitable level of amenity for future occupiers including compliance with the National Space Standards and respects the amenity of neighbouring occupiers, and uses, and does not result in significant harm in relation to light levels, overshadowing, overlooking, loss of privacy, visual intrusion, vibration, noise and fumes, and appropriately designed car parking.
- Establishes healthy communities and well balanced neighbourhoods with the use of shared spaces that encourage social interaction and inclusive environments that create a sense of belonging.
- Includes the integration of public art & and play where possible,
- Creates a safe and secure environment with adequate security measures to deter crime, disorder and anti-social behaviour

Utilities

- Takes a comprehensive and co-ordinated approach to development including respecting existing site constraints and utilities situated within sites
- Provides for discreet provision of utilities with easy access for maintenance purposes.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T1	+	+	+	++	0	+	+	+	0	+	+	+

H.4.1.1 Policy T1 sets out the intention of the Council to provide high quality homes, employment and other development to ensure sustainable growth is delivered through the Local Plan.

H.4.1.2 The policy encourages the integration of SuDS and natural features such as trees and hedges into landscape areas to contribute to the wider GI network. This may provide opportunities to incorporate nature-based solutions to climate change and flooding, recognising the ecosystem services provided by GI features which can for example act as natural carbon sinks and water storage areas. The policy seeks to ensure that opportunities are sought to respond to the climate emergency. The policy seeks to ensure developments incorporate tree-lined streets, which may lead to long term shading and cooling effects in the built environment. These GI features may lead to a variety of benefits, including cooling the urban environment and habitat creation. A minor positive impact is therefore identified for climate change mitigation and adaptation (SA Objectives 1 and 2). **Recommendation:** Stronger wording regarding the measures to mitigate climate change would strengthen the policy, including the provision of electric vehicle infrastructure within the design and layouts of new development.

H.4.1.3 The policy encourages development proposals to consider nature from the outset and incorporate existing natural features into development, including ditches and ponds that can serve multiple functions for drainage and wildlife. Therefore, there is the potential for the policy to have a minor positive impact on biodiversity (SA Objective 3).

H.4.1.4 The policy requires new developments to incorporate a number of design considerations, including to demonstrate how the layout and design responds to the character of the local context in relation to the topography of the site and the "*inventive incorporation / use / interpretation of existing natural features*". The policy seeks to ensure the proposal responds appropriately to the character of the area, including *"the prevailing pattern of plot size and layout relating to the surrounding context position within proposed fabric / edge conditions"* and would ensure Landscape and Visual Impact Assessment (LVIA) / Townscape and Visual impact assessments (TVIA) methodologies are followed where relevant. The use of high quality and local materials are encouraged, supporting high quality place-making. Furthermore, the policy requires development proposals to "*achieves a transition from urban to rural for edge of settlement sites that reinforces distinctiveness and respects appropriate scale, has regard to field patterns and existing landscape features, achieves separation to avoid coalescence, focusses distribution of higher densities towards centres / inner edges*". Policy T1 therefore has the potential to have a major positive impact on the landscape and townscape (SA Objective 4).

H.4.1.5 The policy requires that development proposals must also ensure development "*does not result in significant harm in relation to… vibration, noise and fumes".* A negligible impact is therefore identified for pollution and waste (SA Objective 5).

H.4.1.6 The policy seeks development proposals to make efficient use of land, and as such, there is the potential for a minor positive impact on natural resources (SA Objective 6).

H.4.1.7 The policy promotes high quality housing design and seeking compliance with the National Space Standards. The policy has the potential to have a minor positive impact on the delivery of housing to meet the community's needs (SA Objective 7).

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H.4.1.8 The policy seeks to ensure development proposals create "*good connectivity and permeability that supports existing and new Public Rights of Ways, active travel and provides a clear user hierarchy for pedestrians, cycles, public transport before cars*". These measures may encourage greater use of active transport by residents and more active lifestyles, and reduced reliance on cars, leading to associated health benefits. Therefore, there is the potential for the policy to have a minor positive impact on the health and wellbeing of communities (SA Objective 8) and access to sustainable transport (SA Objective 10).

H.4.1.9 The policy requires development proposals to be of high-quality design and positively contribute to the character and appearance of the area, which could benefit heritage assets. A negligible impact on cultural heritage is identified (SA Objective 9).

H.4.1.10 Although not mentioned directly in the policy, there is the potential for good design and walkable neighbourhoods to lead to more sustainable access to schools, and therefore a minor positive impact on the education objective could be achieved (SA Objective 11).

H.4.1.11 As set out in the accompanying text to the policy, good design can create desirable places for people to live and word, leading to benefits for the economy by attracting greater levels of investment. There is the potential for a minor positive impact on the economy (SA Objective 12).

H.4.2 Policy DM5: Housing design

Policy DM5: Housing design

New housing developments must provide good, healthy living conditions for future occupants with high quality, robust, adaptable housing, inclusive and functional spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities.

All new accommodation must, in addition to the design and amenity policy above (T1):

- As a minimum meet the relevant nationally described internal space standard for each individual units;
- As a minimum meet the Medway Housing Design Standards for external spaces including shared outdoor amenity space, shared access and circulation, cycle storage, refuse and recycling, management, visual privacy and private outdoor space, environmental comfort;
- Incorporate dementia friendly standards where appropriate. As a minimum requirement, the provision of sufficient natural light must be met to satisfy healthy living standards:
  - Single aspect facing homes shall be avoided where possible
  - Demonstrate use of up-to-date British Standards methodologies
- Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkward or impractically shaped rooms, unless there is justification for doing so on the basis of significant design quality gain;
- Demonstrate sufficient space for storage and clothes drying;
- Be informed by a contextual analysis (including a clear and particular attitude to the place) of key character traits that contribute to local distinctiveness. Demonstrate well-defined character areas which individually and collectively create a strong sense of place and as a whole presents development that is clearly differentiated from other places across Medway.

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Policy DM5: Housing design

- Provide for recycling and refuse storage have been built into the overall design and fabrics of proposed accommodation to maximise recycling but without detrimental impact to the street scene or character of an area.
- Be flexible towards future adaptation in response to changing life needs.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM5	0	0	0	+	+	0	+	+	0	0	0	0

H.4.2.1 Policy DM5 focuses on the provision of good living conditions for new residential dwellings, including both internal space standards as well as standards for the provision of outdoor space associated with the dwelling. The internal space standards are set out in the Nationally Described Space Standard[8]. External space standards are set out in the Medway Housing Design Standard[9]. The policy seeks to ensure that homes remain flexible to respond to the changing nature of the environment and needs of residents over time in order to avoid dwellings becoming obsolete or unable to meet future needs. Through providing appropriate housing to meet the needs of the population, a minor positive impact on housing is identified (SA Objective 7).

H.4.2.2 The policy seeks to ensure that development proposals are informed by the local character and distinctiveness, with potential to have a minor positive impact on townscape character (SA Objective 4).

H.4.2.3 The Medway Housing Design Standard cross references to the 'Waste and recycling requirements for new residential developments in Medway' which includes design requirements to provide sufficient internal and external storage for waste to be separated and stored. These measures have the potential to have a minor positive impact on recycling and reduce landfill waste (SA Objective 5).

H.4.2.4 The policy seeks to ensure that residential development provides adequate internal living and sleeping space, with adequate daylight in order to protect residents' mental and physical wellbeing. External space standards are also set out in the policy to ensure dwellings have access to private open space. In addition, the policy encourages dementia friendly standards to be incorporated. The policy therefore has the potential to have a minor positive impact on health and wellbeing (SA Objective 8).

[8] MHCLG (2015) Technical housing standards – nationally described space standard. Available at https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard [Date accessed: 03/03/25]

[9] Medway Council (2011) Medway Housing Design Standards. Available at https://www.medway.gov.uk/downloads/file/61/medway_housing_design_standards [Date accessed: 03/03/25]

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H.4.3 Policy DM6: Sustainable design and construction

Policy DM6: Sustainable design and construction

All new forms of development, residential, commercial or other, should aim for high standards of sustainable design and construction.

Proposals for all types of development whether new or conversion must as a minimum demonstrate:

- Where relevant how proposals adhere to Building for a Healthy Life
- Use of sustainability criteria, such as Building with Nature Standards which define "what good looks like" covering the themes of wellbeing, water and wildlife and other references.
- the use of natural features such as green walls/roofs/hedges/roof top gardens etc to enhance sustainability and Biodiversity Net Gain and contribute to the health and wellbeing of residents.
- design principles founded on locally sourced and/or recycled materials where possible. That new dwellings built to ensure that wholesome water consumption is not greater than 110 litres/person/day.
- details of how the proposal is seeking to address the climate emergency with an aim to achieve or aspire to net zero carbon with due regard to Medway's current Climate Action Plan and Medway Council Corporate Strategies. The whole life cycle of a building should be considered. Where possible proposals for conversion or reuse of buildings will be favoured.
- That the inclusion within any planning application, details of how the proposals will address matters of sustainability both through the design, construction and operation phases via design considerations and submission of a construction management plan.
- Creation of a safe environment including but not limited to during the operational phase of the development but also ensures full remediation of brownfield sites to appropriate standards for re-use.
- Where appropriate and technically and financially viable, any submission must demonstrate how it will meet a very good BREEAM standard for water and energy for non-residential development proposals.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM6	+	+	+	+	+	+	+	+	0	+	+	0

H.4.3.1 In supporting residential development that uses the Building for a Healthy Life (BHL) assessment[10], Policy DM6 has the potential to have a minor positive impact on a number of sustainability objectives, which are reflected in the BHL questions. These include: supporting sustainable access to facilities and services and the subsequent health benefits associated with more active travel (SA Objectives 8, 10 and 11); providing a mix of housing types to meet local needs (SA Objective 7); creating places which reflect local character or create new distinctive character, which also work with the site and context (SA Objective 4); creating well-designed streets with good legibility, which also encourage social interaction (SA Objective 8); providing sufficient well-designed car parking (SA Objective 10); providing sufficient, well designed storage space for waste and recycling (SA Objective 5); and providing adequate cycle storage, encouraging more active and sustainable travel (SA Objectives 8 and 10).

H.4.3.2 Policy DM6 supports the use of locally sourced and/or recycled materials, which has the potential to reduce the use of primary aggregates and resources. The policy requires development to prioritise remediation of brownfield sites, ensuring that the most efficient use of land is sought. The policy also supports residential development which meets the higher national water efficiency standard of 110 litres/person/day and supports non-residential development which meets BREEAM 'very good' standard for energy and water efficiency. These policy measures will be likely to have a minor positive impact on pollution and waste and natural resources (SA Objectives 5 and 6). In addition to seeking higher energy efficiency measures, the requirement for proposals to "*aim to achieve or aspire to net zero carbon*" could potentially lead to a minor positive impact on climate change mitigation (SA Objective 1), through the reduced emissions of GHGs associated with the built environment. Additionally, by encouraging the use of natural features such as green walls and roofs, the policy could potentially lead to a minor positive impact on climate change adaptation (SA Objective 2) by reducing flood risk through rainwater capture and minimising surface water runoff, therefore preventing drainage systems from being overwhelmed.

H.4.3.3 The policy seeks to ensure developments utilise sustainability criteria such as the Building with Nature Standards and also supports the inclusion of "*natural features such as green walls/roofs/hedges/roof top gardens etc to enhance sustainability and biodiversity net gain*". Therefore, a minor positive impact on biodiversity is identified (SA Objective 3).

H.4.4 Policy DM7: Shopfront design and security

Policy DM7: Shopfront design and security

Proposals which would result in the loss of shop fronts of traditional design or materials, and which contribute to the character and appearance of an area, will not be permitted.

Proposals for new commercial or retail frontages should:

- Respect the character, scale, and appearance of the building;
- Incorporate fascias and any additional features which are in proportion to the elevations of the existing building and which avoid obscuring any existing architectural details;
- Complement the positive or historic character of the surrounding area and contribute to the vibrancy and safety of the street.

[10] Homes England (2020) Building for a Healthy Life. Available at: https://www.udg.org.uk/publications/othermanuals/building-healthy-life [Date accessed: 24/04/24]

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Policy DM7: Shopfront design and security

- Ensure that any security grilles or shutters demonstrated to be necessary, are designed to be an integral feature of the frontage and maintain a shop window display.
- External roller shutters will rarely be considered acceptable due to their detrimental impact on the street scene and perceptions of safety.
- Demonstrate compliance with adopted guidance and design codes where applicable.

Where illumination is required, it should be restrained, unobtrusively sited, energy efficient and in context with the building and the wider area.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM7	0	0	0	+	0	0	0	0	+	0	0	0

H.4.4.1 Policy DM7 seeks to ensure the local character of the Medway area is maintained through not permitting *"proposals which would result in the loss of shop fronts of traditional design or materials, and which contribute to the character and appearance of an area"*. This aspect of the policy therefore has the potential to have a minor positive impact on landscape and townscape (SA Objective 4).

H.4.4.2 The Council aims to *"complement the positive or historic character of the surrounding area"* through the policy, and the supporting text also makes reference to respecting the *"character and appearance of the area, particularly on historic buildings"*. This aspect of the policy therefore has the potential to have a minor positive impact on cultural heritage (SA Objective 9.

H.4.5 Policy DM8: Advertisements

Policy DM8: Advertisements

Proposals for the display of advertisements and fascia signs will be permitted unless:

- Their scale, size, design, materials, or illumination would be detrimental to the character and appearance of the land or buildings on which they are to be displayed or of the surrounding area; or
- They result in visual clutter or are excessive in size or number; or
- Their siting on a building extends above ground floor fascia level and fails to respect architectural features or the original divisions of the property; or
- The sign constitutes a road safety hazard which would be likely to distract, confuse or obstruct the vision of road users.

For heritage assets advertisements will not be permitted if their design, materials, size, colour, or siting adversely impacts the significance of the heritage asset or its setting.

Proposals will be supported where materials used are sustainable and lighting is energy efficient.

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	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM8	0	0	0	+	0	0	0	0	0	0	0	0

H.4.5.1 Policy DM8 seeks to ensure advertisements which *"would be detrimental to the character and appearance of the land or buildings"* would not be permitted; it also aims to protect heritage assets within Medway ensuring *"advertisements will not be permitted if their design, materials, size, colour, or siting adversely impacts the significance of the heritage asset or its setting"*. The policy could potentially have a minor positive impact on landscape and townscape (SA Objective 4). Through seeking to avoid harm to heritage assets and *"architectural features"*, the policy is identified to result in a negligible impact on cultural heritage (SA Objective 9).

H.4.6 Policy S8: Historic environment

Policy S8: Historic environment

To ensure the continued contribution that the historic environment brings to Medway, the council remains committed to the conservation, enhancement and enjoyment of the historic environment; including the heritage assets and their distinctiveness and characteristics. This will be achieved through:

- Delivering of the objectives of the Medway Heritage Strategy and national planning policy guidance;
- Ensuring development preserves or enhances the significance of designated and non-designated heritage assets and their settings;
- Ensuring that all new development positively contributes to local distinctiveness and character;
- Encouraging development that makes sensitive and sustainable reuse of heritage assets consistent with their conservation, particularly where they are vacant or redundant, and especially if they are considered to be 'at risk' on national and local registers;
- Working positively with stakeholders and other partners on heritage initiatives, including bids for funding; and
- Promoting the enjoyment, access and interpretation of heritage assets that deliver wider community educational, health and well-being benefits.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S8	0	0	0	+	0	0	0	+	++	0	0	0

H.4.6.1 Policy S8 sets out the approach to the protection and enhancement of the historic environment in Medway. The policy supports development that "*preserves or enhances the significance of designated and non-designated heritage assets and their settings*" and will deliver the objectives set out in the Medway Heritage Strategy as well as in national planning policy guidance. The policy seeks to ensure all development contributes to local distinctiveness and character. The more detailed requirements relating to the protection of above ground and below ground heritage assets are set out in Policies DM9, DM10 and DM11. The accompanying text to Policy S8 sets out the guidance and appraisal documents that can be used to help inform the assessment of the significance of heritage assets. Strategic Policy S8 will help to prioritise the importance of heritage matters in decision-making and has the potential to have a major positive impact on cultural heritage (SA Objective 9).

H.4.6.2 By seeking to ensure new development "*positively contributes to local distinctiveness and character*" this policy is expected to conserve and enhance the character, appearance and distinctiveness of local landscape and townscapes. The policy has the potential to have a minor positive impact on SA Objective 4.

H.4.6.3 By "*promoting the enjoyment, access and interpretation of heritage assets that deliver wider community educational, health and well-being benefits"*, the policy has potential to create greater opportunities for community interaction and generate a greater understanding and appreciation of the qualities of the places where people live and work. Therefore, there is the potential for the policy to have a minor positive impact on health and wellbeing (SA Objective 8).

H.4.7 Policy DM9: Heritage assets

Policy DM9: Heritage assets

Development that impacts a heritage asset, or its setting, should achieve a high quality of design which will preserve and seek to enhance the asset's significance and setting.

Where development impacts upon a heritage asset, or its setting, a heritage statement proportionate to the significance of the asset must be submitted as part of the application. For Historic Parks and Gardens this must include consideration of the landscape architecture, the setting of the historic buildings within or associated to it, along with its visual amenity and wider setting. Where applicable, an Archaeological Assessment and/or Management Plan will also be required.

Development that causes the loss or substantial harm to the significance of a designated heritage asset will only be permitted where it can be demonstrated that substantial public benefits will result that outweigh the harm or loss.

The demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that all possible methods of preserving the asset have been exhausted. In the exceptional circumstances where the loss of a heritage asset can be fully and robustly justified, the developer must make information about the heritage asset and its significance available to, both the Council and publicly, along with making it possible for any materials and features to be secured and safely stored. Should permission be granted for demolition or loss of a heritage asset, all or in part, works will not be permitted to commence until it is proven that replacement development will proceed.

Development proposals shall demonstrate:

- Having met national policy requirements for heritage assets

Policy DM9: Heritage assets

- Adherence to advice set out in government historic environment policy and guidance, including Historic England Conservation Principles, Historic England Good Practice Advice Notes and Historic England Advice Notes.
- Compliance with any relevant published council resources that address the historic environment, such as Conservation Area Appraisals, SPDs, and Design Codes
- Submission of an assessment of how the proposal relates to the local distinctiveness and character of the area;
- In the case of historic parks and gardens, provide improvements for public access.

Where a vacant or redundant, or otherwise 'at risk' heritage asset is brought back into use as part of a proposal and its significance is preserved or enhanced consistent with its conservation requirements and ambitions, this will be encouraged.

To help ensure the delivery of high-quality development and to be able to fully assess the impact of a development, proposals should be submitted as full applications when they are within, or would affect, a Conservation Area.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM9	0	0	0	+	0	0	0	0	+	0	0	0

H.4.7.1 Policy DM9 sets out the requirements for development proposals with the potential to have an impact on heritage assets and their settings. The policy requires development proposals to "*preserve and seek to enhance*" the significance of the asset and its setting. A Heritage Statement is required for all development that may have an impact on the significance of a heritage asset. The policy sets out those limited circumstances when demolition or loss of a heritage asset may be permitted. Additionally, the policy supports rejuvenation of 'at risk' heritage assets. Therefore, the policy has the potential to have a minor positive impact on cultural heritage (SA Objective 9).

H.4.7.2 In seeking to protect heritage assets and their settings, and through the promotion of "*high-quality development*", the policy has the potential to safeguard and enhance some features that contribute to townscape character, and therefore the policy could have a minor positive impact on SA Objective 4.

H.4.7.3 **Recommendation:** Policy DM9 could be strengthened by ensuring that development will "*conserve and enhance*" rather than "*preserve and enhance*" the significance of heritage assets, ensuring that the policy aligns with NPPF wording.

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H.4.8 Policy S9: Star Hill to Sun Pier

Policy S9: Star Hill to Sun Pier

The Star Hill to Sun Pier Development Framework includes the Star Hill to Sun Pier Conservation Area and is designated as a Heritage Action Zone. The Star Hill to Sun Pier Development Framework aims at re-establishing the area as a social, cultural and dynamic destination whilst preserving and enhancing the special historic interest and character of the neighbourhood.

Planning applications will be supported where compliant with the Supplementary Planning document adopted in 2024.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S9	+	0	0	+	0	0	0	0	++	+	0	+

H.4.8.1 Policy S9 seeks to ensure that heritage assets within the identified Star Hill to Sun Pier Action Zone (HAZ) are conserved and enhanced, whilst the area is re-established as a "*social, cultural and dynamic destination*".

H.4.8.2 The policy will ensure that development is in accordance with the adopted Star Hill to Sun Pier SPD (2024)[11], which seeks to retain and reinforce the intrinsic historic and cultural value of the Star Hill to Sun Pier Conservation Area. The SPD sets out a vision and objectives for the area and seeks to ensure that "*New development will be designed to integrate with the historic environment, seamlessly bringing together the old and new, set within a series of revitalised spaces to enhance the special qualities of Intra*". By supporting development which complies with the SPD requirements, Policy S9 could be expected to have a minor positive impact on cultural heritage (SA Objective 9) and the local townscape character and appearance (SA Objective 4).

H.4.8.3 Furthermore, the SPD seeks to enhance the public realm, improve connections for pedestrians in the local area, and provide publicly accessible piers and waterfront areas. Therefore, a minor positive impact on access to sustainable transport (SA Objective 10) could be expected, with the potential for a minor positive impact on climate change by providing a more walkable neighbourhood (SA Objective 1). Additionally, through encouraging visitors by re-establishing the area as a social and cultural destination, the policy could potentially increase employment opportunities and result in a minor positive impact on the local economy (SA Objective 12).

[11] Medway Council (2024) Star Hill to Sun Pier Supplementary Planning Document 2024. Available at: https://www.medway.gov.uk/downloads/file/8610/star_hill_to_sun_pier [Date accessed: 03/03/25]

H.4.9 Policy DM10: Conservation areas

Policy DM10: Conservation Areas

Development within or affecting the setting of a Conservation Area will be encouraged where it contributes positively to the conservation and enhancement of the character, appearance and distinctiveness of the area. Any proposals for development within a Conservation Area must demonstrate that they:

- Respond positively to the guidance within the Conservation Area Appraisal (where they have been prepared);
- Have due regard to that part of the setting of the Conservation Area that would contribute to its significance;
- Respect the historical and architectural interest of the area;
- Use materials and details that are appropriate and sympathetic to the locality and existing buildings;
- Retain historical and architectural features of the area; and
- Remove features that detract from the character of the area unless demonstrated as unachievable.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM10	0	0	0	+	0	0	0	0	+	0	0	0

H.4.9.1 Policy DM10 sets out the policy protection relating to development in conservation areas. The policy outlines the requirement for development proposals to contribute to the conservation or enhancement of the conservation area, in line with legislation relating to conservation areas[12]. Therefore, the policy has the potential to have a minor positive impact on cultural heritage (SA Objective 9).

H.4.9.2 In seeking to protect the "*character, appearance and distinctiveness*" of conservation areas and their setting, and encouraging the use of building materials in keeping with the architecture of the local area, the policy has the potential to contribute to the protection of buildings and other features that contribute to townscape character. Therefore, a minor positive impact on landscape and townscape is identified (SA Objective 4).

H.4.10 Policy DM11: Scheduled monuments and archaeological sites

Policy DM11: Scheduled monuments and archaeological sites

Development that adversely affects Scheduled Monuments and/or their setting, and other important archaeological sites of comparable significance will not be permitted.

Where development impacts, or has the potential to impact heritage assets with archaeological interest, a desk-based assessment, and where appropriate, a field evaluation will be required.

Where development is permitted that affects a heritage asset with archaeological interest, there will be a preference for the preservation in-situ of the archaeology. In instances where the preservation in-situ is not

[12] Planning (Listed Building and Conservation Areas) Act 1990, s69(1)(a)

Policy DM11: Scheduled monuments and archaeological sites

possible or justified, the developer may be required to make provision for the archaeological excavation and recording to be undertaken by an approved archaeological body and in accordance with a specification and programme of work to be submitted to and approved by the Council. Developers will be required to make this evidence (and any archive generated) publicly accessible.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM11	0	0	0	0	0	0	0	0	+	0	0	0

H.4.10.1 Policy DM11 seeks to protect Scheduled Monuments and below ground archaeology. The policy states that development will not be permitted that is likely to have adverse impacts on Scheduled Monuments and their settings or adverse impacts on other important archaeological sites. Where development may impact below ground archaeology, a desk-based assessment is required to inform the level of investigation and protection required. The policy therefore has the potential to have a minor positive impact on cultural heritage (SA Objective 9).

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H.5 Housing

H.5.1 Policy T2: Housing Mix

Policy T2: Housing Mix

The Council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population.

Residential development will only be permitted if it encourages a sustainable mix of market housing that includes an appropriate range of house types, including bungalows, and sizes to address local requirements, as evidenced through the Medway Local Housing Needs Assessment, or updated reports and studies.

The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

Accommodation requirement as detailed in the latest Local Housing Need Assessment will be used to help inform which house sizes and mix should be delivered in key locations in urban and rural areas to meet the objectively assessed needs of Medway as detailed in the latest evidence.

In relation to affordable housing, the Council will require developers to provide details of how this evidence has been used to justify the proposed mix.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the Council's housing register and discuss affordable housing requirements with the Council's Housing Strategy team at the pre-application stage of the planning process.

Development schemes must demonstrate that as part of the housing mix, sufficient consideration has been given to:

- older persons housing need, (particularly for downsizing);
- custom and self-build plots.

The criteria outlined in policy T4 and T9 needs to be observed.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T2	+	0	0	0	0	0	+	+	0	0	0	+

H.5.1.1 Policy T2 aims to ensure that residential developments meet the identified local housing needs, supporting the current and future requirements of the population in terms of housing type and size, as well as providing specialist accommodation for those with particular needs. This will be likely to have a minor positive impact on local housing provision (SA Objective 7).

H.5.1.2 By providing a suitable mix of housing types and tenure, this policy will help to meet the varying needs of residents and provide opportunities for more inclusive communities. The policy has the potential to have a minor positive impact on health and wellbeing (SA Objective 8).

H.5.1.3 By seeking to meet the variety of identified local needs for different types of accommodation, the policy will help to ensure different social groups can be accommodated locally. This may reduce the need for additional travel and commuting, which can occur when local needs are not met, and some social groups are accommodated at greater distances from services, facilities or employment opportunities. There is the potential for the policy to have a minor positive impact on climate change mitigation (SA Objective 1).

H.5.1.4 By ensuring the accommodation needs of residents are met, the policy has the potential to enhance opportunities to locate residents with sustainable access to employment opportunities, with potential for a minor positive impact on employment (SA Objective 12).

H.5.2 Policy T3: Affordable housing

Policy T3: Affordable housing

All developments in Medway of 10 or more residential units (net) will require the delivery of affordable housing.

The level of affordable housing required is informed by the LHNA and the local plan viability assessment, which distinguishes between high value and low value/marginal areas. In line with the viability evidence, the requirement will be for:

- In higher value areas, including the Hoo Peninsula strategic sites and suburban greenfield sites, 30% of all residential units proposed;
- In lower value areas, 25% of all dwellings proposed in greenfield areas, and 10% of all residential units proposed on previously developed land.

In line with Planning Practice Guidance, it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

When delivering affordable housing it is required to:

- Be provided and retained for an affordable use in perpetuity;
- Be designed to be indistinguishable from the market housing on site;
- Be of the same size and scale as market housing;
- Avoid being visibly distinguishable as different from the wider neighbourhood and be delivered across the site where appropriate;
  Reflect the latest tenure mix as set out in the latest Local Housing Need Assessment.
- Reflect the need for affordable accommodation for older persons and those with specialist needs, in line with tenure and size split requirements as detailed in the latest Local Housing Needs Assessment

Delivery of affordable housing should be on site in the first instance. If this cannot be achieved then an alternative approach will need to be robustly justified. The local context and demographics will be a key consideration. The following delivery sequence should be followed to justify any alternative approach:

- A change in the tenure mix on site to facilitate delivery;
- Delivery of the required units on a separate site;
- An agreement with a registered provider to deliver the units off site;
- Only if both on site and off site delivery is demonstrated with robust justification not to be achievable should consideration then be given to a financial contribution provided to the council to the equivalent value of the onsite provision to allow for offsite delivery.

Policy T3: Affordable housing

A viability assessment in line with national policy and guidance should be submitted to the council to be independently verified if the affordable housing proposed does not meet that which is required.
All forms of affordable housing will be provided on the basis of a 'local connection cascade'. The details of this cascade will be determined on a case-by-case basis, but will follow the general approach of prioritising households with an established local connection (and for social and affordable rent) in housing need to the parish or town through residence or place of work, then households from surrounding parishes in the borough, and then wider. This will be secured by a Section 106 agreement.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T3	+	0	0	0	0	0	+	+	0	0	0	0

H.5.2.1 Medway has a significant need for affordable housing. This policy sets out the requirements to deliver affordable housing in urban and rural communities, to ensure that suitable residential development is provided to meet the social and economic needs of the population. Policy T3 will be likely to have a minor positive impact on housing provision (SA Objective 7).

H.5.2.2 In seeking to deliver affordable housing at the rates required to meet local needs, the policy has the potential to reduce travel and commuting patterns that can emerge when people are located at a distance from job opportunities, facilities and services. The policy has the potential to have a minor positive impact on climate change mitigation (SA Objective 1).

H.5.2.3 By seeking to meet the housing needs of local people in the first instance, and in seeking to integrate affordable housing into new development, the policy has the potential to support and create more inclusive communities and result in a minor positive impact on health and wellbeing (SA Objective 8).

H.5.3 Policy T4: Supported housing, nursing homes and older persons accommodation

Policy T4 – Supported housing, nursing homes and older persons accommodation

The development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs including looked-after children - will be supported where it:

- Meets a proven need for that particular type of accommodation.
- Is well designed to meet the particular requirements of residents with social, physical, mental and/or health care needs including the relevant space standards (e.g. the National Described Space Standards).
- Incorporates dementia friendly standards where required.

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Policy T4 – Supported housing, nursing homes and older persons accommodation

- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.
- Does not adversely affect the character and amenity of the area, or the health and well-being of the residents (new and existing).
- In relation to care facilities for looked after children rooms shall comply with the National Described Space Standards (or subsequent equivalent standards) with the provision of suitable communal space of at least one reception room and kitchen or equivalent space.

Loss of specialist housing will be permitted only where it is demonstrated that there is no need for the form of accommodation.

Developers will be expected to have regard to residential design criteria specific to accessibility issues for older persons and others with specialist needs.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T4	0	0	0	0	0	0	+	+	0	+	0	0

H.5.3.1 Policy T4 seeks to support the development of accommodation including housing and care homes for residents with specialist requirements, including the elderly, and those with "*social, physical, mental and/or health care needs*". By ensuring a range of housing is provided to meet the varying needs of the population, this policy will be likely to result in a minor positive impact on housing provision (SA Objective 7).

H.5.3.2 The policy states that specialist housing should be "*easily accessible to public transport, shops, local services, community facilities and social networks*", which will help to ensure that accommodations are well-located with respect to existing facilities and/or have good access to public transport connections where residents are more mobile or independent. This will be likely to help ensure developments allow for safe and convenient access for residents and visitors, including older people and wheelchair users. A minor positive impact on transport and accessibility (SA Objective 10) would therefore be expected.

H.5.3.3 By providing specialist housing to meet specific requirements of the population, including care homes and supported housing, this policy will be expected to have a positive impact on human health by ensuring people can receive the level of support they need to live comfortably and safely. Furthermore, by ensuring that specialist housing is accessible, this policy could help to combat loneliness and help more vulnerable members of society feel more integrated into the local communities, resulting in likely benefits to mental wellbeing. Overall, the policy is identified to result in a minor positive impact on health and wellbeing (SA Objective 8).

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H.5.4 Policy T5: Student accommodation

Policy T5 – Student accommodation

The Council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.

Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need for student accommodation.

The Council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, does not have a negative impact on the core functions of the town centres, and is consistent with strategic, regeneration and redevelopment plans.

Locations for student accommodation must be well served by walking, cycling and/or public transport and accessible to a wide range of town centre, leisure and community uses.

Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land, leisure or community space. Proposals must also avoid impacts to environmental designated sites and where required provide appropriate and adequate measures to mitigate any potential impacts on the local environment.

Purpose built student housing will be required to provide a high quality living environment and include a range of unit sizes and layouts with and without shared facilities to meet the housing requirements of the educational institutions they serve.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T5	+	0	0	0	0	0	+	0	0	+	+	0

H.5.4.1 Policy T5 outlines the Council's commitment to support the development of accommodation for students in appropriate locations to support further education establishments. The policy will help to ensure the provision of suitable accommodation of "*a range of unit sizes and layouts*" in areas where there is an identified local need. Therefore, a minor positive impact on housing provision will be likely (SA Objective 7).

H.5.4.2 By providing high quality student accommodation with a variety of layouts, sizes and locations, the policy could potentially help to encourage more students to move to the area and would help to facilitate higher education provision in Medway. A minor positive impact on education (SA Objective 11) could therefore be expected.

H.5.4.3 Policy T5 states that the development of student accommodation would be supported where it is "*well served by walking, cycling and/or public transport and accessible to a wide range of town centre, leisure and community uses*". By locating development predominantly close to higher and further education establishments, or else within town centres, the policy could potentially help to reduce the students' need to travel and also provide good access to a range of sustainable travel modes such as walking, cycling and bus routes. Therefore, this will be expected to result in a minor positive impact on transport and accessibility (SA Objective 10), and potentially climate change mitigation (SA Objective 1).

H.5.5 Policy T6: Mobile home parks

Policy T6 – Mobile home parks

Proposals for permanent mobile or park home developments will be subject to compliance with planning policy in assessing impact and sustainability.

The Council seeks to protect existing parks from competing uses, and restrict their expansion outside designated areas to limit adverse environmental impacts to the surrounding green and open spaces. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area, particularly those near areas of sensitive environmental interests.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Allhallows Park, or a reduction in the area available for their use will not be permitted.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

Any proposals for updates or intensification must be careful consideration for the colour, massing and materials used, incorporate appropriate landscaping and have no adverse impact on the character of the locality or amenity of nearby residents.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T6	0	0	0	+	0	0	+	0	0	0	0	0

H.5.5.1 Policy T6 aims to protect existing mobile or park home developments within Medway and ensure that their expansion or intensification is restricted in line with planning policy and density guidelines. By protecting existing mobile home parks from competing uses and supporting appropriate expansions in line with the latest standards and guidance, the policy would help to provide accommodation and contribute towards meeting the varying housing needs of the population. A minor positive impact on housing is identified (SA Objective 7).

H.5.5.2 The policy states that further development within existing mobile or park home sites should carefully consider the "*colour, massing and materials used [and] incorporate appropriate landscaping*" to ensure that adverse impacts on the surrounding landscape character and residential amenity are avoided. Furthermore, the policy states that developments should "*seek opportunities to enhance the design and visual impact on the surrounding area*". Therefore, the policy could potentially result in a minor positive impact on the character and quality of local landscapes or townscapes (SA Objective 4).

H.5.6 Policy T7: Houseboats

Policy T7 – Houseboats

The Council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim to:

- Protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place.
- Seek the removal and disposal of any vessel so moored if a boat sinks, or becomes unfit for habitation, derelict or is otherwise abandoned.
- Provide for the amenity and wellbeing of residents through requiring appropriate foul water disposal in proposals for new houseboats
- Seek opportunities to deliver improvements that benefit the local amenity and environment.
- Avoid impacts to designated sites from moorings and/or increased disturbance to habitats and the species they support.
- Any new development that impacts upon BAP priority foreshore (Mudflat) must ensure that vessel wake and grounding upon the foreshore are mitigated for. The Environment Agency may ask for Foreshore monitoring plans where vessel wake is concerned, and a timber of metal grid/plinth system to ensure that vessels do not ground out over intertidal Mud when berthed. In canal and fluvial environments, the creation of wastewater infrastructure for the collection of houseboat waste will be encouraged.

Potential developments will only be supported where there are no adverse environmental impacts upon the health of the designated marine and supporting habitats of the estuaries and rivers.

Any proposal for further growth of houseboats or the replacement of existing ones will need to observe the above policy guidelines, as well as observing the criteria outlined in Policy T22 – Marinas & Moorings.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T7	0	0	+	0	0	0	+	0	0	0	0	0

H.5.6.1 Policy T7 aims to protect existing moorings for houseboats in Medway and continue to ensure suitable management of derelict/abandoned boats. The policy states that areas will be specified where development of further moorings will be permitted, provided that criteria are met, for example to ensure that suitable infrastructure is provided, to ensure that moorings will not adversely affect the health of humans as well as the natural environment. This will help to ensure that current and future residents of houseboats have safe and suitable locations to moor, resulting in a minor positive impact on housing (SA Objective 7).

H.5.6.2 The policy also states that development should "*avoid impacts on designated sites from moorings and/or increased disturbance to habitats and the species they support*", including mudflat habitats, and "*secure environmental benefits*". Therefore, the policy could also help to protect and enhance the natural environment, especially the network of river and marine habitats and the species they support. A minor positive impact on biodiversity (SA Objective 3) could potentially be achieved.

H.5.7 Policy T8: Houses of multiple occupation

Policy T8 – Houses of multiple occupation

The council seeks to avoid detrimental clusters of HMOs and to ensure that they provide a suitable quality of accommodation. Where planning applications for HMOs are not already covered by permitted development rights, they will be favourably considered where they:

- Do not adversely affect the character and amenity of the area.
- Do not contribute to an over concentration of HMOs in a particular area.
- Do not lead to the loss of units suitable for family housing, particularly in areas noted as already containing multiple HMOs.
- Do not contribute to the generation of excessive parking demands or traffic in an area.
- Provide for a suitable level of amenity for future occupiers with rooms complying with the National Described Space Standards (or subsequent equivalent standards) and communal space of at least one reception room and kitchen or equivalent space.
- Make appropriate provision for the storage of waste and cycles.
- Do not adversely affect the health and well-being of the residents (new and existing).

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T8	0	0	0	0	0	0	+	0	0	0	0	0

H.5.7.1 A dwelling is classed as a house in multiple occupation (HMO) if at least three tenants live there and share a toilet, bathroom or kitchen[13]. Policy T8 sets out a number of criteria to ensure that the development of HMOs within the Plan area is only supported where they would not result in detrimental impacts on the surrounding area, including in relation to landscape character, human health and wellbeing, and implications for traffic. The policy also seeks to ensure that development of HMOs "*do not lead to the loss of units suitable for family housing*". This would help to ensure a range of housing options are provided to residents of Medway, and therefore, a minor positive impact on housing is identified (SA Objective 7).

H.5.8 Policy T9: Self-build and custom housebuilding

Policy T9 – Self-build and custom housebuilding

The Council will support self-build or custom build home development in sustainable and suitable locations across Medway, encouraging plot provision in areas preferred by applicants on the Register.

Site Allocations for self-build and custom housebuilding

The following site is identified specifically for self-build and custom housebuilding:

- Fenn Farm, Ratcliffe Highway, Hoo (AS2) – 100% (4 plots)

Sites of 100+ dwellings will be expected to provide no less than 4% plots for self and custom build

To ensure a consistent supply for the demand identified from the Register, sites of 100+ dwellings will be expected to provide no less than 4% plots for self and custom build. They will be secured by use of a Section 106 agreement. If it is not viable to provide self-build plots on site, applicants would be expected to present robust evidence to show why for the Council to consider. No provision will be expected where the scheme proposed is a predominantly flatted development.

Affordable Housing

The affordable housing requirement of the site should be calculated on the total number of homes being delivered, including the self-build and custom housebuilding element. Self and custom build units delivered will not be accepted as part of the affordable housing provision.

All new self-build/custom housebuilding applications

- Applicants will need to have regard to the local landscape and guidance from other relevant Local Plan policies in the same way that other types of residential applications do; this will ensure all types of new development are of high quality.
- Permission granted for self/custom build sites with more than one plot will be outline only; reserved matters applications would be required for each plot sold. In accordance with Government guidance on Self-Build and Custom Housebuilding, the plots must be serviced (have access to a public highway and connections for electricity, water and waste water) or, in the opinion of a relevant authority, can be provided with access to those things within the duration of a development permission granted in relation to that land.
- For larger sites where a proportion will be self/custom build plots, the plots should all be located in one attractive area of the site and not pepper-potted throughout.
- For phased development, self/custom build plots must be provided and serviced at the earliest stage possible. This will be secured by a planning condition.
- Self/custom build plots must respond to the sizes identified on the Register.

[13] Houses in multiple occupation. Available at: https://www.gov.uk/private-renting/houses-in-multiple-occupation [Date accessed: 03/03/25]

Policy T9 – Self-build and custom housebuilding

- The person(s) occupying the plot will need to provide evidence confirming they have had primary input into the final design and layout of their property and that it will be their sole/main residence.
- To prevent overall completion of a site being drawn out and the delay of housing delivery, a short timeframe for building the plot(s) is desirable. This could be translated into a shorter time limited condition than the standard requirement, depending on the site.
- Sites (including the self-build element) that meet or exceed the threshold to trigger the requirement for developer contributions will attract mitigation contributions in the same way as any other housing development.

Design Code

- Depending on the location of the site, the Council may require a design code framework which should be agreed with the Council prior to the submission of the outline planning application. This will ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality. The design code will be secured by condition.

Marketing the self/custom build plot

- Once a site has received outline permission and plots become available for sale, the land owner/developer is required to market (to the satisfaction of the Council) the plots available for self/custom-build for a minimum period of 12 months. The 12 months will start from when the plots are first available for purchase, with the responsibility on the plot provider to notify the council when the marketing period has begun.
- If any plot(s) remain unsold after being marketed for the minimum period, they can either remain for sale as a self/custom build plot, or be offered to the Local Authority to acquire for the provision of affordable housing (separate from any relevant affordable housing requirement for the Development as applicable), before reverting back to the land owner to build out on the plot or sell without restriction. To prevent the delay of housing delivery, the Local Authority will be given a time period of three months to acquire the vacant plot(s). This provision will be secured as part of the original Section 106 agreement.

Expanding/intensifying existing residential permissions

- Where there is an existing residential permission and the developer approaches the council seeking to expand/intensify the development, the developer should demonstrate that they have considered some/all of the additional plots to be provided as serviced self/custom build plots, where there is identified demand.

Speculative residential applications

- Where a landowner has a suitable site that they wish to obtain speculative outline residential permission for, they are encouraged to have regard to the Register and consider the plot for self-build or custom housebuilding, depending on the local demand.

Neighbourhood Plans

- The Council supports the consideration of self-build and custom housebuilding in the preparation of Neighbourhood Plans, and joint working with Neighbourhood Plan groups to establish a locally derived design code.

Rural Exceptions

- These will be considered on a site-by-site basis.

Council owned land and Regeneration

Policy T9 – Self-build and custom housebuilding

- The Council will consider opportunities for self-build and custom housebuilding in disposal of Council land and in promoting regeneration schemes.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T9	0	0	0	+	0	0	+	0	0	0	0	0

H.5.8.1 Policy T9 sets out the Council's support for the provision of plots for self/custom build housing in sustainable locations. This will be likely to help ensure that the Council can deliver an appropriate mix of housing that meets the varied needs of current and future residents, and result in a minor positive impact on housing provision (SA Objective 7).

H.5.8.2 The policy states that "*applicants will need to have regard to the local landscape*" and where sites for more than ten plots are proposed, a design code framework will need to be agreed with the council to "*ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality*". By encouraging the development of self/custom build housing, in accordance with local design guides, this policy could help to increase the diversity of buildings within neighbourhoods and provide visual interest. This could potentially result in a minor positive impact on the character of the local landscape and townscape (SA Objective 4).

H.5.8.3 The policy lists two sites which will be allocated wholly or partially for self and custom-build housing: AS2 and AS22. These sites have been evaluated individually in the SA process as reasonable alternatives; the assessment of Site AS2 within **Appendix G** and the assessment of strategic Site AS22 within **Appendix F**, with a range of effects identified across the SA Framework.

H.5.9 Policy T10: Gypsy, Travellers and Travelling Showpeople

Policy T10: Gypsy, Travellers and Travelling Showpeople

To meet the need for gypsy and traveller and travelling showpeople's accommodation, existing sites will be protected and intensification or expansion sought. New sites will also be permitted where the criteria are met as set out below. The Council will explore the potential to provide more provision of its public site at Cuxton through intensification and/or expansion.

Safeguarding Existing Sites

All authorised* gypsy and traveller and travelling showpeople sites will be safeguarded over the plan period from 2022 to 2041.

Safeguarded gypsy and traveller and travelling showpeople sites will be retained, unless:

- There is a surplus of available accommodation over and above the required five year supply of sites, or,
- The site will be replaced elsewhere in Medway by a site of similar proportions and capacity for pitches or plots in an appropriate location which complies with the criteria listed below for new sites, or,

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Policy T10: Gypsy, Travellers and Travelling Showpeople

Expansion of safeguarded gypsy and traveller and travelling showpeople sites will be permitted where all of the following apply:-

- The density of pitch provision within the application site is maximised, having regard to the minimum separation distances between mobile homes/caravans, etc, as required by any relevant legislation or guidance.
- The proposal would not cause harm to character or appearance of the landscape and must be well-screened by existing or additional native vegetation.
- Foul drainage to a public sewer should be provided where possible. Where it is not, evidence will need to be provided showing that suitable alternative facilities can be provided.
- Adequate parking and turning space shall be provided on site.
- There is adequate provision for storage and maintenance of equipment, where required.

* For the purposes of this Policy, authorised gypsy and traveller and travelling showpeople sites means those with planning permission that are not subject to a condition limiting them to a temporary period or a specified person(s).

New Sites

Proposals for new gypsy, traveller and travelling showperson sites will be permitted, where they meet the following criteria:

- Definition - The intended occupiers meet the national definition of Gypsy, Traveller or Travelling Showpeople
- Need – the Council is satisfied that there is a clear need for the site and that need cannot be met through the expansion of existing authorised sites.
- Location – Not located in the Green Belt, flood risk zones 2 & 3, areas covered by landscape or environmental designations (National Landscapes, SSSI, Ramsar, SPA, SACs, Local Wildlife Sites, Ancient Woodland or local nature reserves), protected open spaces or protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas), or the best and most versatile agricultural land, of Grades 1, 2 or 3a).
- Accessibility – good connections to local facilities for education, healthcare, and convenience retailing.
- Scale – a site should respect its location and surrounding environment and be embedded within it and not intrude onto the landscape and must be well-screened by existing or additional native vegetation. Pitches and plots should be of a sufficient size with adequate provision for storage and maintenance of equipment, where required and, on sites for Travelling Showpeople have space for adequate storage.
- Design – Any proposed site and associated development such as day rooms should be of an appropriate size and designed to minimise the impact on the area.
- Access – there is safe and convenient pedestrian and vehicular access to the public highway, with adequate space on site for vehicle turning and parking.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T10	0	+	+/-	-	+/-	+	+	+	+/-	+	+	0

H.5.9.1 In accordance with the planning policy for traveller sites[14], Gypsies and Travellers are defined as "*persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such*."

H.5.9.2 Travelling Showpeople are defined as "*members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above*".

H.5.9.3 Policy T10 seeks to meet the identified pitch / plot targets for Gypsies and Travellers and Travelling Showpeople (GTTS). The identified need for permanent and transit accommodation is set out within the latest Gypsy and Traveller Accommodation Assessment[15] (GTAA). The policy safeguards existing sites and seeks to meet the additional need for plots and pitches through intensification of existing sites, where adequate access, density and infrastructure can be provided. The policy is expected to meet the identified need for GTTS sites over the Plan period and as a result is likely to have a minor positive impact on housing (SA Objective 7). The delivery of GTTS sites will be monitored as part of the Annual Monitoring Report.

H.5.9.4 The policy sets out the criteria required of all development proposals for GTTS pitches and plots within the Plan area. The criteria require sites to be located outside Flood Zone 2 and 3 and therefore a minor positive impact on climate change adaptation would be anticipated (SA Objective 2).

H.5.9.5 The policy requires new sites to be located outside biodiversity designations, including SSSIs, Ramsar sites, SPAs, SACs, Local Wildlife Sites ancient woodland and LNRs. This would help to protect designated biodiversity assets. However, there is the potential for negative impacts on protected species or loss of habitat, depending on the location and scale of any future proposals, or through the intensification of existing sites. The potential impact on biodiversity is uncertain impact on biodiversity (SA Objective 3).

[14] MHCLG (2023) Planning policy for traveller sites. Available at: https://www.gov.uk/government/publications/planning-policy-for-traveller-sites [Date accessed: 26/02/25]

[15] Opinion Research Services (2024). Gypsy, Traveller and Travelling Show People Accommodation Assessment, May 2024. Available at: https://medway.oc2.uk/docfiles/20/Gypsy%20and%20Traveller%20Accommodation%20Assessment.pdf [Date accessed: 06/03/25]

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H.5.9.6 The policy requires new sites to be located outside landscape designations, namely, the Kent Downs National Landscape. The intensification of existing sites and the development of new sites could potentially have minor negative impacts on landscape through changes to landscape character and views (SA Objective 4).

H.5.9.7 There is uncertainty in the assessment of the impact on pollution and waste as the location and extent of development is uncertain (SA Objective 5).

H.5.9.8 The policy requires new sites not to be located on BMV land and therefore a minor positive impact on natural resources is likely (SA Objective 6).

H.5.9.9 While the policy requires new sites to be located outside "*protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas)*", there is some potential for adverse impacts on the heritage assets and their settings depending on the extent and location of any future proposals, an uncertain impact is identified (SA Objective 9).

H.5.9.10 The policy also requires accessibility from proposed sites to educational facilities, healthcare and a convenience retail store to be considered, with safe pedestrian and vehicular access to the public highway, leading to a minor positive impact on health and wellbeing, transport and education (SA Objectives 8, 10 and 11).

H.5.10 Policy T11: Small sites and SME housebuilders

Policy T11: Small sites and SME housebuilders

The Council seeks to encourage the development of small housing sites that contribute positively to the local community and adhere to sustainable development principles. The Council will support the development of small housing sites in Medway, subject to the following criteria:

- The site must not exceed 60 dwellings (net) in order to maintain the character and scale of the local area.
- Proposed developments must demonstrate high quality architectural design that enhances, respects the character of the surrounding area and appropriate in scale in relation to the surrounding area.
- All dwellings must meet or exceed the national and local design guidance to ensure a high quality of living for residents.
- Proposed developments must not result in an unacceptable level of harm to residential amenity, designated heritage assets, or environmental resources and biodiversity.
- Developers must provide adequate measures to mitigate any potential impacts on the local environment, such as landscaping and green infrastructure, and make a clear contribution to mitigation and adaptation to climate change.
- Small housing sites should be well-connected to existing infrastructure, including public transportation and local amenities, to promote sustainable living practices.
- The site is not part of a larger site unless, through specific proposals to sub-divide a larger site, to speed up the delivery of homes and includes SME builders as part of that delivery mechanism.
- Weight will be afforded to the delivery of small sites by SME housebuilders coming forward.
- Affordable housing will be delivered in accordance with Policy T3

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T11	0	0	0	+	0	0	+	0	0	+	0	+

H.5.10.1 Policy T11 encourages the development of small housing sites "*that contribute positively to the local community and adhere to sustainable development principles*". Therefore, a minor positive impact is identified for housing (SA Objective 7) as the policy may encourage a range of housing sites to be delivered to meet the differing market demands.

H.5.10.2 Policy T11 refers to improvement to *"existing infrastructure including public transport and local amenities, to promote sustainable living practices"* for small housing sites. Given the local scale of these potential small housing sites and the likelihood of their placement near or in existing urban settlements and associated services and infrastructure, there is potential for a minor positive impact on transport and accessibility (SA Objective 10).

H.5.10.3 The Council sets out how it aims to support small housing sites that *"enhance, respects the character of the surrounding area and appropriate in scale in relation to the surrounding area"* through their design and development. Therefore, the policy has the potential to result in a minor positive impact for landscape and townscape (SA Objective 4).

H.5.10.4 Additionally, through supporting SME housebuilders, this may help to provide support for local businesses and employment opportunities for local people. There is potential for a minor positive impact on the local economy (SA Objective 12).

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H.6 Economic development

H.6.1 Policy S10: Economic Strategy

Policy S10: Economic Strategy

The Council will seek to boost Medway's economic performance, securing a range of jobs for its workforce. In principle employment development will be directed to the following broad locations unless otherwise allocated:

- Office (E (g)(i) (formerly B1a) will be directed towards the main town centres and key regeneration opportunity areas.
- Industrial (E (g)(ii), E (g)(iii) (formerly B1b and B1c)) and warehouse (B8) uses will be located on the periphery of Medway, close to existing strategic road network.
- Larger scale Net Zero Carbon Energy generating uses and port using facilities to be directed to the Hoo Peninsula to sites at Kingsnorth and Grain.

The Council will make provision for the scale, range, quality and locational requirements of employment land in its latest identified in the employment needs assessment, when published.

This will be achieved through the following measures:

- Seeking to retain as much employment land as possible.
- The identification of new employment sites in line with the spatial strategy.
- Redevelopment and investment opportunities within regeneration areas.
- Promoting rural employment opportunities in sustainable locations.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S10	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++

H.6.1.1 Policy S10 supports the economic growth of Medway and seeks to meet the identified growth in employment needs for the Plan area as set out in the latest employment needs assessment (at the time of writing, the Employment Land Needs Assessment (ELNA) 2015, updated in 2020). Existing employment land will be safeguarded and new suitable locations for economic growth will be sought to ensure appropriate types and scales of development are delivered within different areas. The policy proposes that office space should be supported in town centres and regeneration opportunity areas. Industrial and storage uses would be supported in areas in proximity to the strategic road and rail network. Larger scale facilities, such as Net Zero Carbon Energy generation and port uses are directed to sites on the Hoo Peninsula to take advantage of rail freight transport and port locations. The strategy seeks to enhance the range of employment opportunities in Medway and in particular seeks to enhance opportunities to work in higher added value employment sectors. The policy will be likely to provide a range of employment opportunities for new and future residents and help to drive economic growth and regeneration within Medway. A major positive impact on the economy (SA Objective 12) is identified.

H.6.1.2 By directing office development towards town centres, and industrial/warehouse development close to the strategic road network, this policy could potentially help to ensure that employment opportunities are provided in more accessible locations. Town centre locations are likely to provide access to a greater range of sustainable travel options for commuting workers such as via public transport and active travel routes. Industrial/warehouse development would be more likely to require access for heavy goods vehicles (HGVs), and so ensuring this development is limited to areas with good road, rail or port access would be beneficial. Overall, the strategy seeks to increase the availability of a range of employment opportunities, including high added value sectors, and seeks to reduce levels of out-commuting to fulfil employment needs. There is the potential for policy to have positive impacts on transport by reducing commuting out of Medway and haulage journey times, reducing the need for some journeys by private car and increasing opportunities for sustainable and active travel to job opportunities, particularly in town centre locations. However, there is likely to be an increase in journeys to some extent as a result of the proposed employment development, which could add pressure to the already congested road network. Overall, the effects on Policy S10 on transport are likely to be mixed (SA Objective 10).

H.6.1.3 By seeking to support the growth of employment opportunities in town centre locations as part of the urban regeneration strategy, the policy has the potential to support the opportunity for people to meet their employment needs locally or access these employment areas using more sustainable transport. Furthermore, the policy promotes Net Zero Carbon energy generation uses, which could help to reduce Medway's contributions to the causes of climate change. However, as discussed in relation to transport (SA Objective 10), there is potential for an increase in journeys and associated GHG emissions. There are likely to be mixed positive and negative effects on climate change mitigation, and the overall impact is uncertain (SA Objective 1).

H.6.1.4 The policy seeks to increase employment land in the Plan area, including for uses which may require a greater number of trips in HGVs, other commercial vehicles and private cars. While the strategy seeks to reduce the number of trips in private cars, there is likely to be an overall increase in traffic and associated air pollutants. There is potential for increased air pollution in existing Air Quality Management Areas (AQMAs). Without mitigation, there is likely to be a minor negative impact on pollution due to the exacerbation of poor air quality within AQMAs (SA Objective 5).

H.6.1.5 The policy would direct a proportion of economic growth towards town centres and promotes regeneration within opportunity areas. This could potentially help to encourage the re-use of brownfield or previously developed land in some locations, resulting in an efficient use of land and rejuvenating degraded townscapes. However, the policy also seeks to promote rural employment opportunities and will be likely to result in a loss of previously undeveloped land, to some extent. There are, therefore, likely to be a mix of minor positive and minor negative impacts on the Plan area's natural resources (SA Objective 6).

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H.6.1.6 By seeking to provide a range of employment opportunities to meet local needs and aspiring to enhance opportunities in higher added value employment sectors, the policy has the potential to decrease rates of unemployment and increase average salaries and the skills of the local workforce. These measures may also help to reduce deprivation and have a positive impact on health and wellbeing. However, the drive to increase employment growth in Medway may lead to increases in air pollution in some areas already within an AQMA, with adverse impacts on health and wellbeing. There are, therefore, potentially mixed positive and negative impacts on SA Objective 8.

H.6.1.7 It should be noted that the sustainability performance of sites allocated for employment development have been assessed separately (see **Appendix F** and **G** of this report). While town centre and waterfront regeneration create opportunities for enhancements to both the character of the townscape and to maintenance of heritage assets, the assessment of these sites identified a range of sustainability impacts in regard to SA Objectives 2, 3, 4 and 9 and therefore, for the purposes of this policy assessment the overall impact for these SA Objectives is uncertain.

H.6.1.8 As this policy focuses on employment provision, it would be unlikely to impact housing and education across the Plan area (SA Objectives 7 and 11).

H.6.2 Policy S11: Existing employment provision

Policy S11: Existing employment provision

Where planning permission is required, proposals for employment uses (Classes Eg, B2 and B8) will be supported at Existing Employment Areas identified on the Policies Map.

Where planning permission is required, proposals for the redevelopment or change of use of employment land and buildings to non-employment uses will be supported where:

- The existing use is proven to be no longer appropriate or viable.
- There is no market interest in the site, and it has been market for a reasonable period (of 12 months)

Once this has been proven then the site will be considered for loss or redevelopment if one or more of the following criteria apply:

- the site is no longer appropriate due to detrimental impact on residential amenity;
- proposals should demonstrate how employment opportunities have been maximised and incorporated into a scheme, where possible; and
- any redevelopment conforms to the Council's regeneration agenda.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S11	0	0	0	0	0	0	0	0	0	0	0	+

H.6.2.1 Policy S11 aims to safeguard existing employment sites within Medway and sets out the Council's criteria to ensure that redevelopment of employment sites only occurs where detrimental effects can be avoided.

H.6.2.2 By resisting the loss of active employment sites, this policy would help to protect existing employment opportunities and retain the existing employment floorspace within the Plan area. By supporting regeneration for different land uses, in accordance with the identified employment land needs for Medway, this policy would also help to direct economic growth towards the most effective industries to support the projected employment growth areas. Overall, a minor positive impact on the economy would be anticipated (SA Objective 12).

H.6.3 Policy S12: New employment sites

Policy S12: New employment sites

New employment sites in Medway, as shown on the Policies Map, will be allocated to meet the needs set out in the latest Employment Needs Assessment.

Brownfield sites are phased before greenfield sites, as per site allocation Policy X.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S12	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++

H.6.3.1 Policy S12 supports development proposals in sites which have been allocated for employment, which reflect the findings of the latest ELNA; this may include warehouse, industrial, office space and creative industry uses. The policy has the potential to increase the quantity and range of employment opportunities across the identified employment sectors, including in higher added value sectors. There is the potential for a major positive impact on the economy (SA Objective 12).

H.6.3.2 The policy seeks to increase employment land In the Plan area, including for uses which may require a greater number of trips in HGVs, other commercial vehicles and private cars, and there is likely to be an overall increase in traffic and associated air pollutants. There is potential for increased air pollution in existing AQMAs, and a minor negative impact on pollution is identified overall (SA Objective 5).

H.6.3.3 By seeking to support the growth of local employment opportunities, the policy has the potential to enable people to meet their employment needs locally or access these employment areas using more sustainable transport. There may also be opportunity to factor in Net Zero or low carbon schemes in new employment developments. However, there is potential for an increase in journeys and associated GHG emissions. There are likely to be mixed positive and negative effects on climate change mitigation and transport, and the overall impact is uncertain (SA Objective 1).

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H.6.3.4 By seeking to provide a range of employment opportunities to meet local needs and aspiring to enhance opportunities in higher added value employment sectors, the policy has the potential to decrease rates of unemployment and increase average salaries and the skills of the local workforce. The policy has the potential to reduce deprivation and have a minor positive impact on health and wellbeing. However, the drive to increase employment growth in Medway may lead to increases in air pollution in some areas already part of an AQMA, with potentially negative impacts on health and wellbeing. There are, therefore, potentially mixed positive and negative impacts on SA Objective 8.

H.6.3.5 It should be noted that the sustainability performance of sites allocated for employment development have been assessed separately (see **Appendix F** and **G** of this report). The assessment of these sites identified a range of sustainability impacts in regard to climate change adaptation, biodiversity, landscape, natural resources and cultural heritage (SA Objectives 2, 3, 4, 6 and 9) and therefore, for the purposes of this policy assessment the overall impact for these SA Objectives is uncertain.

H.6.3.6 As this policy focuses on employment provision, it would be unlikely to impact housing and education across the Plan area (SA Objectives 7 and 11).

H.6.4 Policy T12: Learning and skills development

Policy T12: Learning and skills development

Early years & schools

The Council will support the development of uses that would create schools, nurseries and crèches in the following circumstances.

- There is an identified need for the provision.
- Have safe access by cycle and walking, public transport and car and incorporate a school travel plan;
- Have safe drop-off and pick-up provision;
- Provide outdoor facilities for sport and recreation; and
- Avoid conflict with adjoining uses.

Further & higher education providers

The development and expansion of uses that facilitate further and higher education facilities within the 'learning quarter' at Chatham Maritime will be supported. Development of supporting uses which equip local people with skills and reinforce industry connections where there is an identified link to the Universities, innovative uses, the creative industry and other research and development establishments will be supported where appropriate, and does not conflict with other policies in the plan.

Other education providers

Development that delivers and encourages the creation and expansion of apprenticeship schemes and adult and community education and skills in potential future job areas such as data, technology and AI (IT & digital) as set out in the Skills and Employability Plan for Medway 2035 will be supported.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T12	+	0	0	0	+	0	0	+	0	+	++	+

H.6.4.1 Policy T12 supports the development of skills and learning opportunities throughout Medway. By supporting a range of educational facilities, including uses for further and higher education and other education providers, residents within the Plan area could expect a wider availability of and improved access to education, potentially resulting in an increase in residents with higher level skills and qualifications compared with current levels as outlined within the supporting policy text. Therefore, a major positive impact on education (SA Objective 11) is identified. The policy also seeks to enhance the range and level of education and skills in the local population which has the potential to have a minor positive impact on the economy (SA Objective 12).

H.6.4.2 The policy seeks to ensure that future educational developments provide safe access for cyclists, pedestrians and public transport users as well as providing safe drop-off and pick-up points. The policy criteria provide for a mixture of transport options to reach educational opportunities and could reduce reliance on travel via car, consequently reducing GHG emissions, as well as reducing pollution from traffic build-up by providing safe drop-off/pick-up points for site end users. Therefore, the policy could result in a minor positive impact on climate change mitigation, pollution and transport and accessibility (SA Objectives 1, 5 and 10).

H.6.4.3 The policy criteria require the provision of outdoor sport and recreation facilities and promotes active travel to and from school by walking or cycling, which has the potential to have a minor positive impact on health and wellbeing (SA Objective 8).

H.6.5 Policy T13: Tourism, culture and visitor accommodation

Policy T13: Tourism, culture and visitor accommodation

The Council will support and promote tourism development where it contributes to the local economy, enhances Medway's cultural life, and meets sustainable development principles.

Development that contributes positively to the regeneration of Medway, extends the existing tourism, cultural and visitor economy offer, and enhances the vibrancy and vitality of town centres and waterfront will be welcomed.

The provision of new, and the enhancement of existing cultural assets and visitor facilities, will be supported, where they respect the integrity of their surrounding area and local historic environment.

The development of rural and marine based tourism opportunities will also be welcomed, where they can demonstrate that negative impacts on the environment can be avoided.

Proposals for tourism, cultural and visitor facilities will be assessed against the principles set out below:

- The proposal is appropriate in scale and nature for its location, sensitively designed, respects the characteristics of the built, historic and natural environment, and improves local amenity.
- Maximises opportunities for sustainable travel in accessible locations and minimises traffic generation.

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Policy T13: Tourism, culture and visitor accommodation

- Avoids adverse impacts on the environment and biodiversity and where appropriate achieves BNG.

The Council will support the retention, enhancement and provision of visitor accommodation where it contributes to the sustainable development of Medway's tourism, cultural and visitor economy. Proposals will be assessed against the principles set out below:

- Where it meets a market need, particularly in those sectors of the market where evidence indicates an unmet or growing demand.
- Development enhances the quality and offer of existing visitor accommodation and its setting.
- Where the proposal contributes to the vibrancy, vitality and viability of town centres, local communities, and the sustainability of wider settlements.
- Where the proposal avoids negative impacts on the environment, is appropriate in scale and nature for its location, sensitively designed, respects local amenity, the characteristics of the built, historic and natural environment, avoids siting in areas of high flood risk and intrusion into the landscapes of open countryside.
- Avoids adverse impacts on biodiversity and where appropriate achieves BNG.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T13	0	+	+	+	0	0	0	+	+	+/-	0	+

H.6.5.1 Policy T13 aims to promote and expand tourism, culture and visitor facilities within the Plan area. Tourism and culture forms an important economic sector for Medway. The policy has the potential to have a major positive impact on the local economy (SA Objective 12) through the enhancement and promotion of tourism and visitor-related development and by strengthening the tourism potential of Medway.

H.6.5.2 The policy also supports proposals which enhance the vitality and vibrancy of town centres which may also increase opportunities for cultural activities. This has the potential to enhance the sense of community pride and provide greater opportunities for community interaction, with the potential for a minor positive impact on wellbeing (SA Objective 8).

H.6.5.3 The policy seeks to ensure that adverse environmental impacts are avoided, which may help minimise the potential impacts in relation to pollution (SA Objective 5).

H.6.5.4 The policy supports proposals for tourism development, that meet the identified criteria. Including maximising *"opportunities for sustainable travel in accessible locations and minimises traffic generation*". These criteria will be likely to lead to positive effects on transport and accessibility. However, the policy seeks to increase the number of tourists and is likely to lead to increases in associated traffic trips in private vehicles. Therefore, there are likely to be mixed positive and negative impacts on traffic and transport (SA Objective 10).

H.6.5.5 The policy text states that proposals which avoid "*adverse impacts on biodiversity and where appropriate achieves biodiversity net gain*" will be supported, and therefore a minor positive impact on biodiversity (SA Objective 3) could be expected. This could provide opportunities to enhance the quality and quantity of habitats and improve connectivity for flora and fauna within the Plan area.

H.6.5.6 Policy T13 supports proposals which protect and enhance the local landscape, through being "*appropriate in scale and nature for its location"* and *"sensitively designed*" to their settings, including the historic environment, and also by ensuring that potential sites avoid areas of "*high flood risk*". Therefore, a minor positive impact on climate change adaptation (SA Objective 2), local landscape (SA Objective 4) and cultural heritage (SA Objective 9) could be expected from the policy.

H.6.6 Policy S14: Supporting Medway's culture and creative industries

Policy S14: Supporting Medway's culture and creative industries

The continued growth and evolution of Medway's diverse cultural infrastructure and creative industries will be supported, enhanced and expanded to become a focus for culture and creativity. Local culture and creativity plays a key role in attracting people either to live or visit. Higher education will support the continued growth of the creative industry by equipping local people with skills and reinforcing industry connections. Development proposals must:

- Protect and enhance strategic clusters of cultural attractions, existing cultural facilities, venues and uses and support or create/develop new in town centres and places that are or will be supported by good public transport connectivity or other sustainable travel options and where sensitive to and respectful of Medway's historic environment and assets:
  - Rochester District Centre
  - Chatham town Centre
  - Gillingham District Centre
  - Chatham Dockyard
  - Star Hill to Sun Pier
- Promote and deliver new or enhance existing, locally distinct clusters of cultural facilities, venues and related creative uses especially where they can provide an anchor for local regeneration and town centre renewal. These proposals must be sensitively designed and be in accordance with Medway's policies and ambitions for its historic environment and assets. Areas identified include, but are not limited to the town centres of Chatham, Rochester, and Gillingham; Chatham Docks, Chatham Dockyard, Hoo and the area between Star Hill to Sun Pier. Development proposals should identify further opportunities.
- Consider the use of vacant properties and land for multi-functional purposes, pop-ups or meantime uses for cultural and creative activities during the day and nighttime to stimulate vibrancy and viability and support diversity in town centres or elsewhere where appropriate.
- Seek to ensure that opportunity areas and large-scale mixed developments include new creative uses and cultural venues and/or facilities and spaces for outdoor cultural events.
- Ensure that public realm or spaces within the development are activated and/or the proposed development activates spaces around it to ensure seamless connectivity with the existing surrounds.
- Major development proposals, subject to viability, must include public art that enhances the cultural offer and appearance of the development and its surroundings.

Policy S14: Supporting Medway's culture and creative industries

- Promote and support circular economy uses which align with the creative industry uses and sustainability objectives.
- Demonstrate strengthening of the local creative and cultural network and industry connections with the inclusion of apprentices, local businesses and creatives.

This policy must be read alongside the policy on tourism.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S14	0	0	0	+	0	0	0	+	+	+	0	+

H.6.6.1 Policy S14 seeks to protect and enhance the cultural and creative industries within Medway, through supporting growth in these sectors and recognising their benefits for local communities, including developing new cultural venues within large-scale mixed developments. This policy has the potential to enable greater access to employment opportunities and increased tourism, and therefore, a minor positive impact on the local economy (SA Objective 12) is identified.

H.6.6.2 A minor positive impact on landscape, health and wellbeing, cultural heritage and transport and accessibility (SA Objectives 4, 8, 9 and 10) would also be anticipated. The positive impacts would result from requirements within the policy, including the enhancement of cultural facilities and venues which may, in turn, have a beneficial impact on local landscape and cultural heritage features, such as through "*local regeneration and town centre renewal*" in areas identified to be within "*distinct clusters of cultural facilities, venues and related creative uses*", which may include listed buildings, for example. Additionally, through ensuring cultural facilities are supported by "*good public transport…or other sustainable transport options*", the policy has the potential to improve sustainable transport access to cultural facilities. In supporting the protection and enhancement of cultural and creative facilities, the policy is likely to enhance community cohesion and opportunities for community interaction.

H.6.7 Policy T14: Rural economy

Policy T14: Rural economy

The vision for Medway's rural economy is to secure sustainable growth and service provision in rural communities, while seeking to protect and manage the impact on the environment, natural assets and landscapes. The loss of existing employment uses and community facilities will be resisted. Appropriate growth and expansion of existing business will be supported as will suitably planned farm diversification schemes.

Proposals for new employment development or growth and expansion of existing farms and businesses in the countryside will be supported if the following criteria are met:

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Policy T14: Rural economy

- It does not lead to significant loss of high-grade agricultural land and can be demonstrated that other locations of lower agricultural land value are not suitable.
- It can be demonstrated that the development will not create a significant amount of traffic that is inappropriate to the rural road network, does not result in unacceptable harm to the rural area and its surrounds and seeks to encourage the use of sustainable modes of transport where available.
- It is of an appropriate scale to the location and the wider rural surroundings.
- It does not conflict with other policies in this plan.
- It does not result in the loss of key rural services and facilities that supports the sustainability of settlements.
- Proposed developments must demonstrate high quality architectural design that enhances and respects the character of the surrounding area.
- Proposed developments must not result in an unacceptable level of harm to residential amenity, designated heritage assets, or environmental resources and biodiversity.
- Developers must provide adequate measures to mitigate any potential impacts to the environment

Proposals for loss of employment uses and community facilities in rural settlements and locations outside of settlement boundaries, will need to demonstrate that existing uses cannot be viably sustained and that every reasonable attempt* has been made, without success, to secure a similar re-use of that property or site.

* *Reasonable attempts mean responding positively and with flexibility to queries to enable securing an occupier for the use that needs to be retained. This could mean lowering the price, increasing or reducing the lease length if it were to be leased or looking at splitting the site up into parcels. To demonstrate this, marketing evidence will be required covering at least a one year period.*

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T14	0	0	0	0	0	0	0	0	0	+	0	+

H.6.7.1 Policy T14 sets out the Council's support for growth and diversification of the rural economy, provided that certain criteria are met to ensure the development does not result in harm to the surrounding landscape.

H.6.7.2 By encouraging economic development in rural areas, this policy could potentially help to provide additional employment opportunities and enhanced service provision, resulting in less need to travel for residents within these areas and more choice in employment. The policy also states that development will be permitted where it does not result in the loss of existing rural services and facilities. As such, the policy will be likely to result in a minor positive impact on the economy (SA Objective 12).

H.6.7.3 In addition to seeking to protect and enhance rural service provision, the policy also states that development proposals will be required to demonstrate that "*development will not create a significant amount of traffic that is inappropriate to the rural road network*". The policy could potentially benefit transport and accessibility (SA Objective 10) in rural areas through improving access to jobs and services. The extent to which traffic could be affected by rural economic development would be dependent on the scale and nature of the development and would need to be carefully considered. Overall, a minor positive impact could be achieved on SA Objective 10.

H.6.7.4 The policy states that rural growth will be supported where "*it does not lead to significant loss of high-grade agricultural land*" which could potentially help to direct development away from areas of BMV land and help to limit the loss of agriculturally valuable soils. However, it is likely that rural development would be located on previously undeveloped land to some extent. On balance, a neutral impact is identified with regard to Medway's natural resources (SA Objective 6).

H.6.7.5 The policy seeks to ensure that employment development in the countryside is in keeping with its surroundings, stating that "*developments must not result in an unacceptable level of harm to residential amenity, designated heritage assets, or environmental resources and biodiversity*". The policy may therefore help to reduce the potential for adverse effects on biodiversity, the landscape character, and the historic environment. As such, a negligible impact has been identified overall for SA Objectives 3, 4 and 9.

H.6.7.6 **Recommendation:** it is recommended that further clarity is provided in Policy T14 regarding the statement "*Developers must provide adequate measures to mitigate any potential impacts to the environment*". It is unclear what is encompassed by "*the environment*" and whether this is different to the aspects referred to in the previous bullet.

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H.7 Retail and town centres

H.7.1 Policy S15: Town centres strategy

Policy S15: Town centres strategy

Active creation of a well used sustainable, network of healthy centres and the regeneration of Medway's existing town centres is supported; focussing on creating student and child-friendly, sustainable and accessible centres for people to connect, use for day-to-day purposes and enjoy throughout the day and night. Centres will retain and attract the required fundamental main town centre uses including residential to support sustainable town centre living and reducing the need to travel. Healthy lifestyles and attractive centres can also be supported by improved green and blue infrastructure and public realm. Future-proofing our centres will need consideration of new technologies (communications, renewable and other), climate change mitigation and adaptation.

In doing so, planning decisions will have regard to the ambitions to provide the following alongside a growing and changing population:

- A stronger network of centres (local and rural), shopping parades and neighbourhood centres that support sustainable growth and living alongside Medway's six main centres
- Retail provision is directed to Medway's centres with comparison goods retailing directed to the larger centres and new convenience goods retail provided in existing and new centres. This will achieve good spatial distribution of provision allowing for easy and convenient access to facilities.
- Creation of new centre/s in identified strategic locations of appropriate scale, quantity and distribution to support sustainable growth and travel patterns where justified by the plan's spatial strategy
- The potential to deliver community, service, tourism, culture and creative uses, leisure and food and beverage uses in town centres must be explored thoroughly as sequentially preferable locations
- The primary shopping area will be the focus of active uses that encourage footfall including E(a), E(b), E(c) uses alongside community, cultural and leisure uses. The focus of E(a) uses in Chatham will be along the frontage leading into the Pentagon, signalling its core along the High Street. All proposed uses must contribute positively to the vitality and vibrancy of the High Street, where individually or cumulatively do not have a detrimental impact on the function of the centre and High Street and the ambitions for each centre.
- In-centre and edge of centre locations will also be explored for further provision of employment uses outside of designated employment areas
- Provision of housing to support urban-living and sustainable development. Along the high streets, housing will be supported above ground floor or where otherwise indicated through other town centre policies.
- Enhancements and provision of multi-functional green infrastructure, public realm incorporating sustainable urban drainage features and improved access to blue infrastructure where appropriate.
- Making better use of a valuable and distinctive waterfront
- Consideration of advanced technologies and climate change
- Encourage provision of meanwhile uses to activate high streets, centres and places

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S15	+	+	+	+	+	+	0	+	+/-	+	0	++

H.7.1.1 Policy S15 seeks to support the vitality of town centres in the Plan area, with the objective of focussing on "*student and child-friendly, sustainable and accessible centres*" and supporting a range of day and night uses. The policy supports the development of different uses within town centres to enable "*sustainable town centre living and reducing the need to travel*". The policy also seeks to explore the provision of employment uses in town centres. By seeking to protect vitality and deliver a range of uses in town centres, the policy would help to reduce the need for people to travel in order to meet their retail, social, cultural and, to some extent, employment needs. Therefore, there is the potential for the policy to have a minor positive impact on climate change mitigation (SA Objective 1).

H.7.1.2 By focusing on the enhancement of town centres, there is potential for the policy to encourage development on previously developed land and reduce potential losses of greenfield land or other existing GI. The policy encourages enhancements to and provision of multi-functional green and blue infrastructure, with likely associated benefits to the appearance of the local area as well as climate change adaptation and potentially enhancing biodiversity value within the urban areas. Overall, Policy S15 may have a minor positive impact on climate change adaptation (SA Objective 2) and biodiversity (SA Objective 3). These measures also have the potential to protect existing soils and BMV land and lead to a minor positive impact on natural resources (SA Objective 6).

H.7.1.3 The policy supports the redevelopment of existing town centres to provide a greater range of uses. The redevelopment of brownfield sites, and measures to increase the quality and coverage of GI, has the potential to enhance the character of development on the site and the surrounding public realm, which could lead to minor positive impacts on the local landscape and townscape (SA Objective 4).

H.7.1.4 By seeking to provide a greater range of uses in town centres to meet local needs, the policy will be likely to reduce the need for travel to meet these needs elsewhere in Medway or in neighbouring areas. Therefore, there is the potential for the policy to lead to a minor positive impact on reducing car travel and a reduction in associated pollution (SA Objective 5).

H.7.1.5 Policy S15 seeks to create sustainable town centres, which provide a range of uses and reduces the need to travel which has the potential to reduce pollution emissions associated with car travel. The policy also seeks to create "*child-friendly*" town centres where people can connect, therefore there is the potential for enhancing opportunities for community interaction. Overall, there is the potential for the policy to lead to minor positive impacts on health and wellbeing (SA Objective 8).

H.7.1.6 The policy is not location specific and the proximity of any future redevelopment proposals to heritage features is unknown. There is the potential for development to negatively or positively impact on the significance of heritage assets. At this stage, the potential impacts on cultural heritage are uncertain (SA Objective 9).

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H.7.1.7 By seeking to provide a range of uses in town centres and reducing the need to travel greater distances to meet retail, cultural and other needs, the policy has the potential to lead to minor positive impacts on sustainable transport (SA Objective 10).

H.7.1.8 By seeking to deliver an appropriate range of uses in the centres, Policy S15 has the potential to lead to the creation of employment opportunities in locations which are also likely to be more accessible by sustainable transport. The policy will help to encourage footfall in town centre locations and support existing services as well as encourage new services and functions. Therefore, there is the potential for the policy to have a major positive impact on the economy and employment (SA Objective 12).

H.7.1.9 **Recommendation:** Policy S15 could be strengthened through referencing the conservation and enhancement of cultural heritage features alongside the proposed enhancements to town centres, or cross referencing to historic environment policies.

H.7.2 Policy S16: Hierarchy of centres

Policy S16: Hierarchy of centres

The function of centres as multi-purpose destinations, meeting places and the main locations for retail, community, services, leisure and employment will continue to be supported in relation to their individual role, function and scale. Chatham is the primary centre with the highest level of infrastructure and services and has immense potential for further growth that will support multiple sustainability objectives. It therefore remains at the top of the hierarchy being the focus of the majority of comparison retail to meet the strategic needs for Medway's communities.

1. Medway's hierarchy of centres is:
    a. Principal Town Centre: Chatham is the focus of high-quality regeneration, city scale infrastructure and services. It is the main location for comparison retail, community uses, essential services, leisure, tourism (in support of local heritage assets, tourism, creative uses and a cultural focus) and sustainable urban living with a vibrant evening economy
    b. District Centres: providing essential services, community uses to support sustainable living and creating efficiencies in linked trips. The council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres (individually and in relation to Chatham to maintain the hierarchy): Strood, Gillingham, Rainham, Rochester and Hempstead Valley
    c. Local/Rural Centres: The Council seeks to maintain community uses the sustainably accessed local top up shopping offer and to satisfy the day-to day needs of the local population
2. New local/rural centres or shopping parades/neighbourhood centres compliant with the council's retail policies and strategy will may be required in identified areas of strategic growth of Hoo/Chattenden, High Halstow and Strood West.
3. New centres need to be planned and appropriate in scale and function in serving the new/growing communities. In doing so, these centres also need to take into consideration the proximity and scale of existing provision to avoid compromising the health of existing centres. Proposals will need to be supported by a robust justification talking into account the existing provision, demographics, character and scale of the area.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S16	+	+	+/-	+	+	+	0	+	+/-	+	0	++

H.7.2.1 Policy S16 supports the growth of town centres and in particular the regeneration of Chatham to provide a range of uses to support sustainable city living as well as servicing the retail, cultural, leisure and employment needs of the wider Medway community. By seeking to support the regeneration of Chatham and co-locate different uses in town centres, the policy could help to reduce the need to travel and provide services in locations where there is a greater availability of public transport and active transport options. The policy has the potential to have a minor positive impact on reducing GHG emissions (SA Objective 1).

H.7.2.2 By focusing development within town centres, there is the potential for the policy to encourage development on previously developed land and reduce potential losses of greenfield land or other existing GI. There is the potential for the policy to have a minor positive impact on climate change adaptation (SA Objective 2). This also has the potential to protect existing soils and BMV land and lead to a minor positive impact on natural resources (SA Objective 6).

H.7.2.3 Furthermore, Policy S16 could help to conserve biodiversity features associated with greenfield land and the open countryside, although there could also be some localised losses of urban biodiversity associated with the redevelopment of brownfield land within centres. There is potential for both positive and negative effects on biodiversity depending on the specific location of growth supported by the policy, and as such, the overall impact is recorded as uncertain (SA Objective 3).

H.7.2.4 The policy supports the regeneration of Chatham and the provision of an appropriate range of uses in District Centres and Local Centres. The redevelopment of town centre sites has the potential to enhance the character of the site and the surrounding public realm and there is the potential for positive impacts on landscape and townscape (SA Objective 4).

H.7.2.5 By seeking to provide a greater range of uses in town centres to meet local needs, the policy has the potential to reduce the need for travel to meet these needs elsewhere in Medway or in neighbouring areas. Therefore, there is the potential for the policy to lead to a minor positive impact on reducing car travel and a reduction in associated pollution (SA Objective 5). By seeking to enhance the service provision in town centres, the policy could lead to a minor positive impact on access to sustainable transport (SA Objective 10), particularly in areas within Medway which are already well connected to the public transport network, such as Chatham, Rochester, Strood, Rainham and Gillingham.

H.7.2.6 Policy S16 seeks to create sustainable town centres, which provide a range of uses and reduce the need to travel which has the potential to reduce pollution emissions associated with car travel. The policy also seeks to support sustainable city living, providing opportunities for greater community interaction. There is the potential for the policy to lead to minor positive impacts on health and wellbeing (SA Objective 8).

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H.7.2.7 The policy is not location specific and the proximity of any future redevelopment proposals to heritage features is unknown. In relation to Chatham, the policy states that regeneration would "*support local heritage assets*". Across all centres, however, there is the potential for development to negatively or positively impact on the significance of heritage assets. At this stage, the potential impacts on cultural heritage are uncertain (SA Objective 9).

H.7.2.8 Policy S16 seeks to direct growth to town centres in accordance with the identified hierarchy. The policy is based upon the North Kent Retail and Leisure Needs Assessment (2016)[16], which concluded that Chatham should be identified as the principal town centre. The supporting policy text states that "*the retail and town centre strategy supports a network of centres and directs growth to centres first*". By identifying the town centre hierarchy and the appropriate uses associated with each level in the hierarchy, the policy has the potential to facilitate economic regeneration of town centres and encourage economic diversity, and therefore, could have a major positive impact on the economy (SA Objective 12). The policy recognises that a new local centre or centres are likely to be required in association with proposed areas of strategic growth.

H.7.3 Policy T15: Sequential assessment

Policy T15: Sequential assessment

Main town centre uses are directed to Medway's centres first.

Proposals to provide or expand main town centre uses outside of defined centres whether in retail parks, leisure designations or elsewhere, and where not in accordance with the development plan and/or any part of the retail and main town centre uses strategy within it, are required to demonstrate through a sequential assessment that there are no sequentially preferable sites available, i.e. the proposal must follow the assessment sequence of in-centre first, edge of centre and then out of centre.

The sequential assessment must be supported by a Council agreed and defined catchment area and proposal footprint at the earliest opportunity. The proposed use, scale and trade draw of the proposal will determine the appropriate location within the hierarchy of centres, e.g. city scale in Chatham, large scale specialised, evening economy and diversification of uses in main district/town centres and small scale within local centres.

LPA's and applicants must demonstrate flexibility in scale and format when assessing sequentially preferable sites. Flexibility includes locational requirements in particular town centre sites are highly accessible, therefore car parking requirements are expected to be significantly reduced.

When considering sequentially preferable edge and out of centre sites, due to the unavailability of large central sites, preference will be given to sites that are accessible and well connected to town centres.

All proposals must demonstrate sustainable travel choices in support of the application submission and must thereby satisfy sustainable transport policies DM18 and DM19.

[16] Avison Young (2016) North Kent SHENA. Retail & Commercial Leisure Assessment. Final Report. Volume 1 – Main Report.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T15	+	+	+/-	+	+	+	0	+	+/-	+	0	+

H.7.3.1 Policy T15 seeks to direct town centre uses to Medway's main town centres, as identified in the hierarchy in Policy S15. Proposals for such uses outside the main centres, or not otherwise in accordance with the Plan, are required to undertake a sequential assessment. The sequential assessment seeks to direct development to 'in-centre' first, then 'edge of centre' and then 'out of centre'. In considering sites, those which are not in the main centres, preference would be given to sites that are accessible and well connected. In relation to large scale leisure proposals, the policy requires the development to have sustainable access and no negative impact on the surrounding road network.

H.7.3.2 By supporting proposals for town centre uses in central locations and or those locations with more sustainable transport infrastructure, the policy has the potential to reduce the need to travel and provide opportunities for sustainable travel choices. There is the potential for the policy to have a minor positive impact on climate change mitigation (SA Objective 1) and pollution (SA Objective 5).

H.7.3.3 The policy is not location specific and, at this stage, the potential impacts of any proposals on flooding, surface water management or GI are uncertain. However, by focusing on the provision of town centre uses within existing town centres, rather than in out-of-town locations, there is the potential for the policy to lead to development on previously developed land and reduce potential losses of greenfield land or other GI. There is the potential to introduce new GI into town centre proposals. Overall, there is the potential for Policy T15 to have minor positive impacts on climate change adaptation (SA Objective 2) and natural resources (SA Objective 6).

H.7.3.4 Policy T15 is not location specific and therefore the potential impacts on biodiversity are uncertain (SA Objective 3).

H.7.3.5 The policy directs the development of town centre uses to existing town centres. The redevelopment of brownfield sites has the potential to enhance the character of development on the site and the surrounding public realm and therefore there is the potential for minor positive impacts on landscape and townscape (SA Objective 4).

H.7.3.6 The policy supports the delivery of a range of uses in town centres and has the potential to support development on previously developed land. This has the potential to protect existing soils and BMV agricultural land, and lead to a minor positive impact on natural resources (SA Objective 6).

H.7.3.7 There is the potential for minor positive impacts on local residents' health and wellbeing (SA Objective 8) by supporting the provision of town centre uses in existing town centres, which may revitalise these areas and enhance opportunities for local community interaction.

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H.7.3.8 The policy is not location specific and the proximity of any future redevelopment proposals to heritage features is unknown. There is the potential for development to impact on the significance of heritage assets negatively or positively. At this stage, the potential impacts on cultural heritage are uncertain (SA Objective 9).

H.7.3.9 By supporting the provision of a range of uses in town centres, reducing the need to travel greater distances and seeking sustainable access to out of centre locations, the policy has the potential to lead to minor positive impacts on sustainable transport (SA Objective 10).

H.7.3.10 Policy T15 has the potential to lead to the creation of employment opportunities in locations with a greater likelihood of being accessible by sustainable transport. Therefore, there is the potential for the policy to have a minor positive impact on the economy and employment opportunities within the Plan area (SA Objective 12).

H.7.4 Policy T16: Ancillary development

Policy T16: Ancillary development

Ancillary development proposals for main town centre uses outside centres are required to be compliant with the sequential test and impact test where triggered. The tests undertaken should be proportionate to the proposal.

All proposals for ancillary use must demonstrate:

a. the proposed use is necessary and / or complementary to the main use in terms of scale and function;
b. the proposed use is secondary/dependent on and cannot function independently of the predominant/main use
c. that there is a direct relationship between the ancillary proposal and the predominant/main use.
d. access to the ancillary use is dependent on access used by the predominant use and where not feasible, all other criteria listed in a, b, c, and e are satisfied
e. Consideration will be given to the physical location of the proposal in relation to the predominant/main use when assessing b, c and d above.

It may be necessary to manage the ancillary use through condition to maintain its secondary nature. The scale of the proposal may also require an impact assessment and therefore requires compliance with Policy T17 (impact assessment) where it meets the criteria.

Consideration will be given to issues of trading impact or where proposals have location-specific requirements.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T16	0	0	0	0	0	0	0	0	0	0	0	+

H.7.4.1 Policy T16 sets out the requirements for ancillary development proposals for main town centre uses, when proposed in out-of-town centre locations. The policy seeks to ensure that such development is of a scale and type that is appropriate to the surrounding land uses.

H.7.4.2 Policy T16 supports Policy S16, Hierarchy of Centres, in seeking to manage development proposals outside town centres which may impact on the vitality and footfall in town centre locations. Policy T16 will be likely to help ensure development related to town centre uses, remains focused in town centres and is likely to support the sustainability performance of Policy S16 in preventing greater levels of development in less sustainable locations. Therefore, through ensuring management of development proposals within and outside town centres, a minor positive impact on the local economy is identified for Policy T16 (SA Objective 12). The impact of Policy T16 on the remaining sustainability objectives is assessed as negligible.

H.7.5 Policy T17: Impact assessment

Policy T17: Impact assessment

Proposals that seek to provide or expand retail and leisure uses in edge or out of centre locations including retail parks, leisure designations and Hempstead Valley Shopping Centre will be permitted where:

a) it is supported by an impact assessment where proposals for comparison, convenience retail, or leisure (including food and beverage and other large-scale facilities like bowling alleys and ice-skating rinks etc.). The scale of food and beverage proposals will be given locational consideration.

Impact Assessment Thresholds		
Convenience	Comparison	Leisure
280sqm	500sqm	500sqm

b) it is demonstrated that the proposal would not have a significantly adverse impact on:

- the strategy - development, retail and main town centre uses strategy
- vitality and vibrancy of centres within the catchment of the proposal
- existing, planned or committed town centre investment in, or supporting town centres
- the health and sustainability of centres with due consideration given to the cumulative impact of proposals considered relevant as agreed by the case officer.
- the vulnerability of the Medway's centres with due consideration given to the local context

Where appropriate development proposals may be conditioned or legal requirements established to manage the impact on centres, particularly where the impact is not considered significantly adverse to justify refusal and where proposals come forward in increments and can have cumulative impact.

The Council may also require public realm works, signage or other to facilitate better linkage with neighbouring centres to assist with linked trips.

All proposals must demonstrate sustainable travel choices in support of the application submission and must thereby satisfy sustainable transport policies DM18 and DM19.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T17	+	0	0	0	0	0	0	+	0	+	0	+

H.7.5.1 Policy T17 supports Policies S15 and S16 and seeks to support the vitality of town centres within the Plan area, by ensuring locally defined thresholds are used as a trigger for the requirement of impact assessments. By providing locally defined thresholds, retail and leisure proposals outside of the identified centres would be assessed for their wider impact on the economic viability of the town centres and on planned future investment in town centres. This policy is likely to have long term minor positive impacts on the local economy (SA Objective 12).

H.7.5.2 By seeking to support the economic viability and vitality of town centres, the policy seeks to support urban regeneration and encourage greater use of town centres, where there is likely to be a greater range of sustainable transport choices, less reliance on private car use and reduced journey times. The policy requires all proposals to ensure sustainable transport choices are available. There is likely to be a minor positive impact on transport (SA Objective 10) and climate change mitigation (SA Objective 1).

H.7.5.3 Policy T17 may also lead to greater use of town centres and greater opportunities for community interaction and an improved sense of place. There is the potential for a minor positive impact on community wellbeing (part of SA Objective 8).

H.7.6 Policy S17: Chatham Town Centre

Policy S17: Chatham Town Centre

Chatham Town Centre is a sustainable waterfront town with city scale infrastructure and is the main centre within the network of well-connected centres in very close proximity to one another making ambitions of sustainable travel and urban living possible. Chatham Town Centre will be the heart of the community, hive of activity and destinations for people to live, work and enjoy. It has a diverse high street offer set in a respected historic context and is a location for comparison retail, community uses and services, commercial leisure (food and beverage), creative uses, culture and tourism. Medway's primary centre's role extends beyond satisfying local need, attracting visitors from across Medway and neighbouring authorities.

It has strong links with the universities in Medway, the hospital and creative industries. Connectivity with the Chatham Dockyard and Chatham Intra areas are important linkages, which when enhanced will improve connections to and support the growth of the creative and cultural sectors and helping to reposition Medway as a culture hub.

Development within the centre will grow the resident population and create the demand for the expansion and creation of further job opportunities, community uses and services and provide a range of creative, cultural and leisure experiences throughout the day and night and be supported by the appropriate level of enabling infrastructure. In doing so development:

- Must comply with the 2019 Chatham Masterplan and Chatham Design code or the most up to date guidance

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Policy S17: Chatham Town Centre

- Must comply with the main thrust of the High Street quarters concept within the Chatham Design Code 2024 and Chatham Masterplan 2019 and the desired uses within a Primary Shopping Area. The units at the entrance of the Pentagon is particularly important as signalling the core of the high street where retail is predominant. The type of uses can increase in diversification when moving away from the Pentagon along either side of the high street.
- Must also adhere to the Arches Chatham Neighbourhood Plan policies and Star Hill to Sun Pier Development Framework guidance where relevant
- Explores opportunities for the provision of convenience retailing to complement the existing offer and extend operating hours
- Proposals for ground floor residential uses along the High Street will be favoured on the eastern end of the High Street closest to the White Lion Pub and above ground floor anywhere along the High Street with appropriate justification supporting planning applications. This does not preclude residential development from happening anywhere else outside the primary shopping area in the town centre where justified and does not impede activity, sustainability or the health of the High Street
- Proposals for employment uses in and on the edge of the town centre is encouraged to support sustainability and accessibility
- Must include consideration and demonstration of how to make the centre suitable for all including child-friendly. This could include uses that occupy shop units, creatively designed multipurpose furniture/seating, opportunities for active uses long the waterfront
- Proposals that include enhancing or creating culture, creative industries, community uses as well as enhancing the evening economy will be supported
- That includes creative, innovative and cultural uses must explore opportunities to enhance connectivity with the Chatham Intra and Dockyard areas by way of use proposed and its co-location/location along the high street.
- Will be favoured where they provide public realm enhancements including green and blue infrastructure to create an attractive place to live, work, shop and enjoy.
- Must support healthier lifestyles by providing access to and making better use of the river frontage.

Proposals for opportunity sites will be guided by the following:

- The former ‘Debenhams’ site is designated for comprehensive redevelopment, which could include residential, employment, leisure, commercial leisure, food court, child-friendly uses, car parking
- The ‘Pentagon’ is designated as an opportunity site for enhancements. Units on either side of the High Street Pentagon entrance must sign post the Pentagon shopping centre and reinforce the ‘core’ along the High Street.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S17	+	0	0	0	0	+	+	+	+	+	0	++

H.7.6.1 Policy S17 sets the vision for Chatham Town Centre and sets out various measures to help achieve this, including the aim for the centre being "*the heart of the community, hive of activity and destinations for people to live, work and enjoy*". The policy supports various plans and guidance in ensuring that the centre responds positively to the requirements of the Chatham Town Centre Masterplan (2019)[17] and the emerging Chatham Design Code[18], in order to improve its current underperforming status as a centre.

H.7.6.2 The policy highlights the importance of maintaining the economic viability of Chatham and supports appropriate residential and economic development in defined locations, potentially leading to significant improvements in employment opportunities for local residents through increased High Street footfall and improved linkages with other areas such as Chatham Dockyard and Chatham Intra. The policy also seeks to boost the tourism and night-time economies. Policy S17 is therefore likely to have a major positive impact on the local economy (SA Objective 12) through supporting the provision of a range of businesses in Chatham, leading to an improvement in the availability of leisure, cultural and creative experiences for users of Chatham Town Centre and a minor positive impact on the delivery of housing (SA Objective 7).

H.7.6.3 By seeking to improve the range of services and facilities available in the town centre and deliver greater levels residential development, the policy has the aspiration to deliver "*urban living*", with the potential to reduce the need to travel for some residents, reduce journey times for local residents choosing to access town centre services and is more likely to offer sustainable transport choices to access these uses. There is the potential for the policy to lead to reduced GHG emissions and a minor positive impact on climate change mitigation (SA Objective 1).

H.7.6.4 The focus of the policy strongly centres on the regeneration of the town centre, ensuring that proposed employment areas maximise use of current brownfield sites, as set out in the Chatham Town Centre Masterplan. The redevelopment of brownfield land represents an efficient use of land in accordance with the NPPF. Therefore, a minor positive impact on natural resources (SA Objective 6) could be expected from the policy.

H.7.6.5 Through promoting Chatham as an area to be prioritised for a range of new investment opportunities and seeking to support 'urban living', the policy is likely to improve community cohesion amongst local residents, creating a richer, varied and enhanced sense of place with greater access to services. Therefore, a minor positive impact on residents' wellbeing and accessibility (SA Objectives 8 and 10) could be expected from the policy.

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[17] Medway Council (201 quality) Chatham Town Centre Masterplan. Available at: https://www.medway.gov.uk/downloads/file/4524/chatham_town_centre_masterplan [Date accessed: 03/03/25]

[18] Chatham Design Code. Available at: https://www.medway.gov.uk/chathamdesigncode [Date accessed: 03/03/25]

H.7.6.6 Chatham Town Centre is associated with numerous heritage assets including Listed Buildings and a conservation area. The policy requires development proposals to be in accordance with the Heritage Action Zone guidance[19] (discussed further within Policy S9), which could mean that redevelopment proposals within Chatham supported by Policy S17 would ensure the conservation and enhancement of heritage assets alongside regeneration schemes, helping to improve the quality and appreciation of the historic environment. There is the potential for a minor positive impact on cultural heritage (SA Objective 9).

H.7.6.7 **Recommendation:** Policy S17 could be strengthened through referencing the conservation and enhancement of cultural heritage features alongside the proposed enhancements to town centres, or cross referencing to historic environment policies, in particular Policy S9 'Star Hill to Sun Pier'.

H.7.7 Policy S18: Rochester District Centre

Policy S18: Rochester District Centre

Rochester District Centre is well known for its heritage, leisure and cultural offer drawing on custom beyond the local population. The centre is supported by a strong restaurant and café offer complemented by independent shops and boutiques but is lacking in convenience retail provision. Opportunities for the provision of top-up convenience goods retailing will be supported as well as other proposals that support this centre's role where a balance is achieved with the existing provision and is in-keeping with the current independent shop character.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S18	+	0	0	0	0	0	0	+	0	0	0	+

H.7.7.1 Rochester is considered to be a successful district centre, with a strong historic character and a diverse range of boutique shops and a good restaurant offer. The policy approach for Rochester Town Centre is to maintain the current range of facilities, with the addition of convenience goods stores. The addition of a convenience food store will be likely to have a minor positive impact on residents' wellbeing (SA Objective 8) and may serve to reduce the number of journeys local residents take to alternative provision, for example in Strood, leading to a potential minor positive impact on climate change mitigation and transport (SA Objectives 1 and 10).

[19] Medway Council. Heritage Action Zone. Available at: https://www.medway.gov.uk/info/200177/regeneration/1218/heritage_action_zone [Date accessed: 03/03/25]

H.7.8 Policy S19: Gillingham District Centre

Policy S19: Gillingham District Centre

Gillingham District Centre performs a local function, catering for the needs of residents within its catchment. It provides sustainably accessed community facilities and services and a vibrant market necessary to cater for day-to day needs.

Opportunities for diversification and regeneration to enhance the offer, public realm, accessibility, emphasise and celebrate its military heritage will be supported.

This can include:

- the formalising of a square for events and activities,
- opportunities to co-locate community facilities to improve accessibility and convenience,
- enhancing the food and drink offer on the western part of the high street,
- creating opportunities for a greater variety of uses on the high street that increases dwell time and
- improving vehicular movement that supports the function and health of the centre.
- Enhancing access to the waterfront and supporting health and wellbeing by using the former dock rail line and adjacent green spaces to create a green pedestrian and cycle route.

All proposals must comply with the Gillingham Masterplan 2019 or most up to date guidance.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S19	0	0	0	+	+	0	0	+	0	+	0	+

H.7.8.1 Gillingham District Centre is considered to have a good range of services to meet local needs. Policy S19 supports proposals to diversify and regenerate the range of uses available, including enhancing the range of food and drink on offer, that may increase dwell time on the High Street and encourage greater levels of spending. The policy has the potential to have a minor positive impact on the local economy (SA Objective 12).

H.7.8.2 Policy S19 supports proposals which enhance the public realm and celebrate the area's military heritage, potentially leading to a minor positive impact on townscape character (SA Objective 4).

H.7.8.3 The policy also supports proposals to co-locate community facilities and seeks opportunities to improve vehicular movement and reduce congestion. The policy has the potential to have a minor positive impact on pollution and health and wellbeing (SA Objectives 5 and 8).

H.7.8.4 The policy requires development proposals to ensure accordance with the Gillingham Town Centre Masterplan (2019)[20], which includes recommendations to improve the public realm and pedestrian / cycle connectivity as well as addressing local traffic issues. In addition to townscape character and health benefits, these measures will be likely to result in a minor positive impact on transport and accessibility in the local area (SA Objective 10).

H.7.9 Policy S20: Strood District Centre

Policy S20: Strood District Centre

Strood District Centre is known as a convenience retail destination and performs a local function. Being the first train stop in Medway, Strood offers a greater potential to become a more attractive destination of choice with great travel links into London. In doing so, opportunities exist for the expansion of its role to include a more diverse employment and retail offer alongside further residential growth.

All proposals must comply with the Strood Masterplan 2019 or most up to date guidance.

Adjacent to the town centre is a large edge-of-centre retail park. At present, the retail park is a significant attractor of visits to the town. As a retail park or until alternate proposals emerge, opportunities for better connections to the High Street and the centre, to encourage more linked trips, should be explored, particularly where proposals come forward for additional / re-organised space at the retail park.

Proposals for growth of the centre will be guided by the following:

- The development of a central public open space
- Proposals for employment uses in and on the edge of the district centre is encouraged to support sustainability and accessibility.
- The centralisation of a community hub and creation of a new health hub
- Seeking opportunities to support diversification and expansion of the light industrial offer adjacent to the centre
- A transport interchange (within or adjacent to the centre), providing a destination for a Bus Rapid Transit corridor connection with Hoo St Werburgh.
- Improved pedestrian access and new platforms at Strood rail station to enable access to London Victoria services.
- The development of strategic flood management infrastructure.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S20	+	0	0	+	+	+	0	++	+/-	+	0	++

[20] Tibbalds Planning & Urban Design (2019) Gillingham Town Centre Masterplan & Delivery Strategy. November 2019. Available at: https://www.medway.gov.uk/downloads/file/4525/gillingham_town_centre_masterplan [Date accessed: 03/03/25]

H.7.9.1 Policy S20 supports proposals leading to the regeneration and revitalisation of Strood District Centre and sets out guidelines for the type and amount of new development to be provided in this area. It should be noted that the potential impacts of individual development sites proposed in the Local Plan have been assessed separately as set out in **Appendix F** and **G** of this SA Report.

H.7.9.2 The policy supports the development of employment and light industrial uses in accessible locations, and therefore will be expected to have major positive impact on the delivery of, and access to, employment opportunities (SA Objective 12). The policy requires development to be in accordance with the Strood Town Centre Masterplan (2019)[21], which supports the redevelopment of sites, while taking account of the need to maintain the range of town centre uses to meet local needs.

H.7.9.3 The Local Plan seeks to locate new development where there is the greatest opportunity for sustainable transport choices. Strood benefits from having an existing railway station, with high-speed services to London and potentially good public transport links or river boat links to other towns in Medway, including the Hoo Peninsula. By seeking to regenerate the District Centre, there is the potential to provide a greater range of services to meet local needs in a location with good sustainable transport choices. A minor positive impact on climate change mitigation is therefore identified (SA Objective 1).

H.7.9.4 Strood is located in an area at high risk of tidal river flooding and surface water flood risk. Future proposals will need to take into account flood risk in locating appropriate uses in areas of higher flood risk and in the design of development. The policy requires development proposals within the centre to develop strategic flood management infrastructure, which will be likely to reduce the potential for adverse effects; a negligible impact on climate change adaptation is identified (SA Objective 2).

H.7.9.5 The creation of a new public open space and the opportunities created by regeneration initiatives have the potential to enhance the townscape of Strood District Centre and there is the potential for a minor negative impact on landscape and townscape (SA Objective 4).

H.7.9.6 There is the potential for improvements to the transport network to lead to a reduction in vehicular-related emissions and a minor positive impact on pollution (SA Objective 5).

H.7.9.7 The policy supports the Council's strategy of developing previously developed land in preference to greenfield locations. The policy will potentially help to protect BMV land and a minor positive impact on natural resources is identified (SA Objective 6).

H.7.9.8 Policy S20 supports the development of a new central public open space and supports the centralisation of a community hub and a new health hub. Such facilities would provide opportunities for formal and informal community interaction and potentially enhance social cohesion, as well as offering new healthcare support. The policy has the potential to have a major positive impact on health and wellbeing (SA Objective 8).

H.7.9.9 While there are few listed buildings in Strood District Centre, the area is described as having some buildings of historic townscape interest within the Strood Town Centre Masterplan. New development may lead to positive or negative impacts on cultural heritage, and the impact on cultural heritage is uncertain at this stage (SA Objective 9).

[21] Allies and Morrison Urban Practitioners (2019) Strood Town Centre Masterplan. Available at: https://www.medway.gov.uk/downloads/file/4523/strood_town_centre_masterplan [Date accessed: 03/03/25]

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H.7.9.10 The policy supports highway improvements to improve the flow of traffic in the town centre and reduce the dominance of vehicles, as well as seeking to create improved connections between the retail park and the town centre. These measures will be likely to reduce journey times through the area and have a minor positive impact on transport and accessibility (SA Objective 10).

H.7.10 Policy S21: Rainham District Centre

Policy S21: Rainham District Centre

Rainham District Centre provides for the local community needs and must remain fit for purpose.

Improvements in connectivity by way of cycle links, public realm improvements and green spaces and Wi-Fi will be supported. Opportunities for improving the food and drink offer will also be supported.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S21	0	0	0	0	+	0	0	+	0	+	0	+

H.7.10.1 Rainham District Centre forms one of the smaller centres in Medway. Policy S21 seeks to maintain the centre to keep it "*fit for purpose*".

H.7.10.2 The policy supports improvements to cycleway links and green spaces and has the potential to enhance access to sustainable transport choices and encourage active travel. Minor positive impacts on transport, health and wellbeing and pollution are anticipated (SA Objectives 10, 8 and 5).

H.7.10.3 The policy supports proposals which enhance the food and drink offer. This may help to meet local daily needs and a minor positive impact on transport and access and the economy (SA Objectives 10 and 12).

H.7.11 Policy S22: Hoo Peninsula

Policy S22: Hoo Peninsula

New planned growth for the Hoo Peninsula will require supporting infrastructure and centres to provide for the needs of new residents. Current deficiencies provides a unique opportunity to ensure appropriate provision for residents but also support efficiencies and sustainability.

A new centre with two neighbourhoods centres will be required.

The main centre:

- Ensure the location is accessible to the existing and growing population in the Hoo/Chattenden area and is sustainably accessed with the preferred location being to the east of Hoo
- be provided in an attractive location in order to secure investment for main town centre uses
- ensure place making ambitions are achieved, through the co-location of community and retail uses in a concentrated area benefitting from increased accessibility, footfall and linked trips. This is key to ensuring healthy centres in support of social cohesion.

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Policy S22: Hoo Peninsula

The neighbourhood centres:

- One to be located centrally along Chattenden lane to serve the existing and new planned growth. This centre will contain an element of convenience retail
- A second neighbourhood centre to be centrally located to best serve the planned new growth. It could benefit from co-location with existing facilities like the Hoo Sports Centre.

The new centre will need to be planned and appropriate in scale and function in serving the new/growing communities. A balance needs to be achieved taking into account the existing centres and their roles and functions. New centres must be complementary to the existing, and should not undermine the existing village centre.

Proposals will need to be supported by a robust justification and up to date evidence taking into account the existing provision, demographics, character and scale of the area.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S22	+	0	0	0	+	0	0	+	0	+	0	+

H.7.11.1 Policy S22 supports the development of a new centre and supporting infrastructure to meet the daily needs of the proposed new communities on the Hoo Peninsula. The policy recognises the role of the current local centre at Hoo St Werburgh and supports the development of a complimentary centre, helping to address current evidenced deficiencies.

H.7.11.2 By supporting the development of new local centres the policy has the potential to have a minor positive impact on the local economy (SA Objective 12).

H.7.11.3 In seeking to meet the daily needs of new and existing communities on the Hoo Peninsula, the policy has the potential to reduce the number and/or length of journeys required to meet those needs. This would also lead to a reduction in GHG emissions and pollution associated with use of private vehicles. There is the potential for minor positive impacts on transport (SA Objective 10), climate change mitigation (SA Objective 1) and pollution (SA Objective 5).

H.7.11.4 The creation of new centres may provide further opportunities for community interaction and enhance social cohesion, leading to a minor positive impact on wellbeing (SA Objective 8).

H.7.11.5 The policy requires the new centre to be in *"an attractive location"* and ensure that *"place making ambitions are achieved"*. Furthermore, the policy requires the new centre to be in keeping with the existing village centre in terms of scale and function. Based on current wording and available information, a negligible impact on the local landscape is identified.

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H.7.12 Policy S23: Hempstead Valley District Centre

Policy S23: Hempstead Valley District Centre

Hempstead Valley is a non-traditional centre without a high street. It functions differently to the other traditional centres with high streets and therefore has a varied historic role and function. The Council recognises that it currently provides for local needs and will need to grow to support future growth in this part of Medway. Its modernisation and growth in appropriate circumstances where commensurate to its role and function, within the retail hierarchy.

Further retail and leisure development, appropriate to the character, function and role of the centre will be supported, following an impact test (Policy T17), where it can be demonstrated that it does not undermine the vitality, viability, role and function of the main traditional town centres in Medway, or undermine the retail hierarchy as set out in Policy S16.

The Council may also require consideration of the cumulative impact of recent consents to manage impact on other centres more appropriately.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S23	0	0	0	0	0	0	0	0	0	0	0	+

H.7.12.1 Policy S23 supports proposals to modernise or grow Hempstead Valley District Centre, provided the proposals meet the Sequential Assessment (T15) and Impact Assessment (T17) policies.

H.7.12.2 The policy has the potential to support the economic development of this centre, providing the proposals do not impact on the functions and vitality of the other retail centres and their role in the retail hierarchy. The policy has the potential to have a minor positive impact on the economy through the delivery an appropriate level of growth and range of uses (SA Objective 12).

H.7.12.3 The sustainability impacts of supporting development within centres and the regeneration of the other centres are assessed separately in the policies relating to those centres (Policies S17 to S22) and the policies relating to Sequential Assessments and Impact Assessments (Policies T15 and T17).

H.7.13 Policy DM12: Local and rural centres

Policy DM12: Local and rural centres

1. Uses within a newly defined (in areas of significant growth of Hoo, Chattenden, High Halstow, Strood West where justified) or existing local centre/s or rural centre/s (equivalent to an urban local centre) must be appropriate to the scale, character and role of the centre, be compliant with the council's retail policies and include the following uses to support the core function:
   a. Convenience retail offer to provide top up shopping is essential and central to the function of centres and is vital in rural shopping centres

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Policy DM12: Local and rural centres

b. Community uses (such as hall, library, notice board)
c. Services (such as hairdressers, cash machines)
d. provide convenience for local communities (allowing various activities to be undertaken)

Where substantial growth is envisaged in areas of strategic growth, the Council will identify and encourage new centres to support new growth.

2. Proposals resulting in the loss of a top-up shopping facility where there are no other similar facilities within walking distance will not be permitted.
3. Proposals resulting in the loss of the core uses listed b. to d. above will be permitted in local and rural centres where the proposals are in compliance with the council's retail policies and it is demonstrated that:
   a. the loss is mitigated by the provision of a similar uses of community value; or
   b. it is demonstrated that abundant provision exists in close proximity, is easily accessed, within walking distance and adds value to the centre;
   c. the proposed use would make a positive contribution to the vitality and viability and balance of uses in the centre and is of appropriate scale and character;
   d. the unit has remained vacant for at least 6 months and can be demonstrated that reasonable attempts have been made, without success, to let or sell the premises for a shop, service or community use.
4. The importance of local services in rural areas is critical in supporting sustainable communities. In addition to the above, loss of any facilities in rural centres will need to demonstrate no or limited impact on the sustainability of the rural centre. Proposals will be resisted where determined to be demonstrably harmful to the sustainability of the rural centre.

Local centre:

- LC 183-193 Station Road, Rainham
- LC 126-146, 141-143 High Street, Rainham
- LC 1-45 Parkwood Green
- LC 151-169, 198 & 208 Fairview Avenue
- LC 140-148 (evens) Hempstead Road
- LC 30-48 (evens) Hoath Lane, 2 Wigmore Road, 2 Woodside
- LC 367, 371-377 (odds), 390, 392 Maidstone Road, Rainham
- LC 1-64 Twydall Green & Goudhurst Road
- LC 12-40 (evens) London Road, Rainham
- LC 42-58 (evens) & 59-65 (odds) Sturdee Avenue
- LC 1a-8, 15, 17 Livingstone Circus, 1-6 Livingstone Buildings Barnsole Road, 196-206 (evens), 239 & 253-261 (odds) Gillingham Road, 142 Franklin Road
- LC 46-100 (evens) & 27-147 (odds) Watling Street
- LC 428-432 (evens), 541-543, 551-563 Canterbury Street, 168-184 (evens) Rainham Road, 1-23 (odds) Watling Street
- LC 88-135 (evens), 95-115, 123-131, 139-171 (odds) Canterbury Street
- LC 172, 178-200 (evens), 237-255 Canterbury Street
- LC 302-304 (evens) and 318-320 (evens) Canterbury Street
- LC 60, 70, 94-96 (evens), 65, 67 Duncan Road, 2 Franklin Road, 60, 68, 82 77-79 Balmoral Road

Policy DM12: Local and rural centres

- LC Chatham Waters
- LC Victory Pier
- LC 2-16, 28-46, 64-76 (evens) Luton Road, Chatham
- LC 23-55 (odds), 50-54 (evens Luton High Street, 4-10 Nelson Terrace and 10a Beacon Hill
- 161 - 183b (odds) Wayfield Road, Chatham
- 1 – 5 (incl) and 20 – 25 (incl) Shirley Avenue, Tiger Moth and 16a Highview Drive and Formula One Autocentre Maidstone Road Chatham
- LC 42-86 Silverweed Road
- LC Princes Park, Chatham
- LC Kestrel Road, Newton Close and Sultan Road Lordswood
- LC Walderslade Village Centre
- LC 1-12 (incl) Admirals Walk, 17-19 Gould Road and 600 Lordswood Lane, Lordswood
- LC 2-16 (evens) and 1-5 (odds) Ordnance Street Chatham
- LC 106-112 (evens) and 27-35 (odds) Pattens Lane Chatham
- LC 64-70 (evens) and 1-4 Leake House, The Fairway
- LC 118-130a Maidstone Road Rochester
- LC Borstal Village
- LC 48-136 (evens) and 166-168 Delce Road, 179-181 and 160 Rochester Avenue and 4,5 and 6 Cossack Street, Rochester
- LC 165 – 181 (odds) Bligh Way, Strood
- LC Darnley road. Cedar road
- LC 1-7 and 15 – 43 (odds) Wells Road, Strood
- LC Darnley road. Elaine Avenue
- LC 34,36, 61-69 Bryant Road, Strood
- LC 2-20 (evens) London Rd, Strood
- LC 86-110 (evens) 116, and 103 - 109 (odds) Frindsbury Road, Strood

Rural centre:

- RC Hoo village – existing
- RC Hoo – Miskin Road
- RC Cliffe Woods

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM12	+	0	0	+	+	0	0	+	0	+	0	+

H.7.13.1 Policy DM12 seeks to protect local and rural centres and ensure a suitable range of uses are maintained in these centres to support meeting daily needs for local residents. By supporting local and rural centres, and resisting the loss of existing facilities, the policy has the potential to have a minor positive impact on the local economy (SA Objective 12).

H.7.13.2 In seeking to meet the daily needs of residents, the policy has the potential to reduce the number and/or length of journeys required to meet those needs. This would also lead to a reduction in GHG emissions and pollution associated with use of private vehicles. There is the potential for minor positive impacts on climate change mitigation (SA Objective 1), pollution (SA Objective 5) and transport (SA Objective 10).

H.7.13.3 By protecting local and rural centres, the policy enhances opportunities for community interaction and social cohesion, and a minor positive impact on health and wellbeing is identified (SA Objective 8).

H.7.13.4 The policy requires new proposals to be in keeping with the scale and character of the existing centre. There is potential for a minor positive impact on landscape and townscape (SA Objective 4).

H.7.14 Policy T18: Shopping parades and neighbourhood centres

Policy T18: Shopping parades and neighbourhood centres

Shopping parades and neighbourhood centres are not part of the retail hierarchy. Their function and role is very localised and will not compete with defined centres in the hierarchy but they are essential in creating a sustainable network to provide for residents essential needs.

The council will encourage the provision of a network of services and facilities, in accessible locations, to support the day-to-day activities of residents in a sustainable manner, particularly where significant growth is envisaged in strategic locations, which include Hoo, Chattenden, High Halstow and Strood West.

Considerations of sustainability will include the offer (balance of retail, community uses and services), and accessibility - the mode of travel and distance. Each parade should at least have a convenience, service or community offer at its core to support the community.

Shopping parades (urban areas):

- SP 173-179 Rainham high street
- SP 88-94 Station Road, Rainham
- SP 116-120 Wakeley Road, Rainham
- SP 1-4 Norreys Road
- SP 286-288 Lonsdale Drive
- SP 45-49 Peverel Green
- SP 275-277, 277a, 277b Gillingham Road and 219 Barnsole Road
- SP 153, 155 Barnsole Road
- SP 499, 511 Canterbury street
- SP 55-63, 67 Canterbury Street
- Shopping Parade: SP 38-46 (evens) Gillingham Road and 129-135 (odds) Trafalgar Street
- SP 119-123 James Street, Gillingham
- SP 105, 124, 138, 140 Richmond Road, Gillingham
- SP Forge Lane
- SP 268-274 (evens), 291 Luton Road, Chatham

Policy T18: Shopping parades and neighbourhood centres

- SP Luton Road, Chatham
- SP 110a -114 (evens) Luton Road, Chatham
- SP 11-16 The Links, Wayfield
- SP 27-31 Yarrow Road, Chatham
- SP 60-70 (evens) Holland Road, Chatham
- SP 121-125, 135 (odds), 124 Walderslade Road
- SP 111-113 Boundary Road Chatham
- SP 94-104 Maidstone Road Chatham
- SP 5-7 Scotteswood Avenue, Chatham
- SP 7-12 (incl) Central Parade, Marley Way
- SP 76-82 (evens) Leander Road and 53-57b (odds) Orion Road
- SP 208-214 Maidstone Road, Rochester
- SP 1, 1A and 1B Beatty Road (City Way junction)
- SP 65-71 City Way (Pattens Lane junction)
- SP 69-83 Maidstone Road
- SP 80 - 86 John Street
- SP 1-3 (odds) Cazeneueve Street, Rochester
- SP 2-16 (evens) and 3 Victoria Street, Rochester
- SP 41-47 Carnation Road. Strood
- SP 64, 89-97 (odds) Bryant Rd & 49 Weston Road, Strood
- SP 59 and 59b Grove Road, Strood
- SP 1-9 Rochester Court
- SP Rochester Riverside

Neighbourhood (rural areas):

- NC Hoo Village – Pottery Road
- NC Cliffe
- NC High Halstow
- NC Allhallows
- NC Lower Stoke
- NC Grain
- NC Cuxton
- NC Halling Village
- NC Wainscott Village

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T18	+	0	0	0	+	0	0	+	0	+	0	+

H.7.14.1 Policy T18 supports the provision of a network of smaller neighbourhood centres which provide a convenience, service or community function. In seeking to provide such services in proximity to the communities they serve, the policy has the potential to reduce the need to travel and the length of journeys associated with meeting these daily needs. There is the potential for a minor positive impact on climate change mitigation (SA Objective 1), pollution (SA Objective 5) and transport (SA Objective 10).

H.7.14.2 In supporting the provision of local convenience stores, services and community functions in neighbourhood centres, the policy has the potential to increase opportunities for community interaction, leading to a likely minor positive impact on health and wellbeing (SA Objective 8).

H.7.14.3 The policy has the potential to support the provision of local services and businesses and result in a minor positive impact on the local economy (SA Objective 12).

H.7.15 Policy T19: Meanwhile uses

Policy T19: Meanwhile uses

Proposals for meanwhile uses of vacant units, street spaces, shopfronts, rooftops, squares, green spaces, development sites (prior to construction) or any other acceptable space will be supported where compliant with the Council's strategies, guidance and policies for the area and:

- does not preclude permanent use of the space, plot or unit, which better aligns with the Council's strategies;
- it benefits the community and contributes toward the function of the area or meets a specific need identified by the Council;
- contributes positively to the character and early activation of the area
- within a centre the proposed use/s makes a positive contribution to the vitality and viability of the centre including the consideration of commercial leisure, cultural and creative amongst other 'active' uses
- new and existing vacant shopfronts should allow temporary uses to provide an active use that promotes local entrepreneurship and/or caters to the local creative industries
- does not give rise to unacceptable impact on residential amenity and on the transport network
- erection of structures and fixtures for the operation of the business must be easily removable and the space or unit returned either to its previous condition or better.
- The design of new spaces should consider how the infrastructure and layout can enable hosting meanwhile and temporary events
- Redevelopment or development of sites should incorporate a meanwhile use strategy to use empty sites prior to the start of and during construction to ensure the activation of spaces.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T19	0	0	0	+	0	0	0	0	0	0	0	+

H.7.15.1 Policy T19 encourages the temporary use of vacant buildings and spaces in order to enhance the character of the local area, particularly where there are long-standing vacant properties. The policy has the potential to enhance the character of the local context, particularly in areas where vacancies are detrimental to the appearance of the public realm and adversely affecting civic pride. Such meanwhile uses must demonstrate there would not be an unacceptable adverse impact on residential amenity. The policy has the potential to have a minor positive impact on landscape and townscape (SA Objective 4).

H.7.15.2 The policy seeks to have a positive impact on the perception of the local area and may lead to the early activation of the area and increased commercial activity. There is the potential for a minor positive impact on the local economy (SA Objective 12). The policy sets out measures to ensure that the 'meanwhile uses' do not inhibit the deliverability of the Local Plan.

H.7.16 Policy DM13: Medway Valley Leisure Park

Policy DM13: Medway Valley Leisure Park

Medway Valley Leisure Park is a family leisure destination that attracts visitors and residents to the location. It also provides accommodation and supporting uses for those staying overnight in Medway for business or pleasure.

All new leisure proposals are directed firstly to Medway's centres as the sequentially preferable locations. Development proposals will be supported where compliant with the leisure designation and where enhancing or replacing current provision without requiring expansion beyond the designated boundary unless justified by growth in the area and subject to consideration of necessary flood mitigation compliance with policies DM18 and DM19 and the council's retail policies:

- satisfying that no sequentially preferable sites were found in centres, edge or out of centre locations that are well connected;
- that the impact assessment has been satisfied where triggered.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM13	+/-	0	0	0	+/-	0	0	+	0	+/-	0	+

H.7.16.1 Policy DM13 supports proposals for enhancing or replacing the current provision of leisure and related uses at Medway Valley Leisure Park in order to meet identified needs for these uses. The policy supports the 'town centres first' approach and the sequential and impact tests (Policies T15 and T17, assessed separately).

H.7.16.2 By seeking to accommodate the identified needs for leisure, hotel accommodation and other uses, the policy may help to protect and potentially increase the diversity and quantity of local employment opportunities. There is the potential for a minor positive impact on the economy (SA Objective 12). The support for new or improved leisure development or supporting uses could potentially lead to a minor positive impact on health and wellbeing (SA Objective 8).

H.7.16.3 The policy does not specifically address sustainable transport, although it would only support leisure proposals where no sequentially preferable sites were found in other better-connected locations within or closer to centres. While Medway Valley Leisure Park lies in proximity to a number of bus stops, development proposals in more peripheral locations, with readily accessible parking provision, are more likely to be accessed using private vehicles, which has the potential to lead to associated increases in GHG emissions and other vehicle-related pollutants. No specific development proposals are set out in the policy and therefore the likely impacts on transport are uncertain (SA Objective 10). As future changes in vehicle use as a result of the policy are uncertain, there is also uncertainty in relation to climate change mitigation (SA Objective 1) and pollution (SA Objective 5).

H.7.16.4 Medway Valley Leisure Park lies adjacent to the River Medway and associated flood defences, and is in an area identified as being at higher risk of surface water flooding. Policy DM13 requires any development proposals to consider necessary flood mitigation, in line with other Local Plan policies, which would be anticipated to alleviate the potential for negative impacts on climate change adaptation. A negligible impact is recorded overall (SA Objective 2).

H.7.17 Policy DM14: Dockside

Policy DM14: Dockside

Dockside is a family leisure and retail destination attracting visitors and residents and providing sufficient car parking.

All main town centre uses including new retail and leisure proposals are directed firstly to Medway's centres as the sequentially preferable locations. Development proposals will be supported where unable to be accommodated in the other defined centres upon satisfaction of sequential test (T15) and impact assessments (T17) where triggered.

All proposals must:

- provide sustainable transport options and also demonstrate compliance with policies DM18 and DM19.
- Consider necessary mitigation measures to future proof against flooding
- Be sensitively designed with due consideration of its location within the Zone of influence identified for the Medway Estuary and Marshes SPA
- Include public realm improvements including the provision of green and blue infrastructure.
- Be respectful of heritage assets and be designed with sensitivity to these assets.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM14	+/-	+	+	+	+/-	+	0	+	+	+	0	+

H.7.17.1 Policy DM14 sets out the policy position in relation to the Dockside area, which lies to north of the A289 and east of the River Medway. The policy supports the 'town centres first' approach and the sequential and impact tests (Policies T15 and T17, assessed separately).

H.7.17.2 By seeking to accommodate the identified needs for leisure and retail uses, the policy would help to protect and potentially increase the diversity and quantity of local employment opportunities. There is the potential for a minor positive impact on the economy (SA Objective 12). The support for new or improved leisure development or supporting uses could potentially lead to a minor positive impact on health and wellbeing (SA Objective 8).

H.7.17.3 The policy requires all development proposals in the Dockside area to ensure sustainable transport options are provided, which could potentially lead to a minor positive impact on transport and accessibility (SA Objective 10). Although there may be some indirect benefits to vehicle-related GHG emissions and air pollutants as a result of this, given the readily accessible parking provision of the Dockside Outlet there is also potential for the policy to result in an increased number of trips using private vehicles, with associated increase in GHG emissions and other vehicle-related pollutants. However, the policy also requires development proposals to provide GI and BI, with associated benefits to air quality and enhanced carbon sequestration capabilities. Overall, the overall impact on climate change mitigation (SA Objective 1) and pollution (SA Objective 5) is uncertain.

H.7.17.4 Dockside lies adjacent to the River Medway and is in an area identified as being at higher risk of fluvial flooding and surface water flooding. Policy DM14 requires any development proposals to consider necessary flood mitigation, which would be anticipated to alleviate the potential for negative impacts on climate change adaptation. Furthermore, the policy requires development proposals to provide GI and BI, which could potentially help to reduce flood risk through reduced surface water run-off rates and benefit local biodiversity through the provision of habitats and increased ecological connectivity. If effectively implemented, minor positive impacts could be achieved for climate change adaptation and biodiversity (SA Objective 2 and 3).

H.7.17.5 The policy seeks to ensure that an attractive destination is provided for visitors, with development proposals required to include improvements to the public realm. Therefore, a minor positive impact on the local townscape character could be achieved (SA Objective 4).

H.7.17.6 The policy supports development on previously developed land and therefore supports an efficient use of land in comparison to development in greenfield locations. There is the potential for a minor positive impact on natural resources (SA Objective 6).

H.7.17.7 As a consequence of the historic relationship between Medway and its rivers, there are numerous heritage assets associated with its waterways. There is the potential for development and change to bring positive or negative impacts on heritage assets. The policy requires new development to ensure sensitive design which respects heritage assets, which could potentially lead to a minor positive impact on the historic environment overall (SA Objective 9).

H.7.17.8 **Recommendation:** Policy DM14 could be strengthened through ensuring reference to the conservation and enhancement of heritage assets and their settings.

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H.8 Transport

H.8.1 Policy DM15: Monitoring and managing vehicle trip generation

Policy DM15: Monitoring and managing vehicle trip generation

As a minimum, development proposals for site allocations of 50 or more homes, or 5,000 sqm floorspace, will demonstrate how trips generation would be materially lower than the vehicle trip credit set in the IDP. This target is intended to positively challenge developers to pursue a creative approach, however full policy compliance should ensure that this is achievable.

Developer contributions towards the package of transport mitigations will be due in line with the Infrastructure Delivery Plan (IDP) or the outcome of a Medway-wide Monitor and Manage Mitigation Strategy.

Development proposals in urban centres, including site allocations, are exempt due to their accessible location, providing they comply with all other transport-related policies in this Local Plan.

Development proposals for 'windfall'/unforeseen sites will also be expected to make proportionate developer contributions towards the package of transport mitigations.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM15	+	0	0	0	+	0	0	+	0	+	0	0

H.8.1.1 The Strategic Transport Assessment (STA) sets out a vehicle trip budget, which is based on a "*reasonable worst-case scenario*" in terms of additional road traffic generation as a consequence of the development proposed in the Local Plan. Policy DM15 requires allocated sites to demonstrate a 10% reduction on this budget. This approach seeks to encourage development proposals to reduce trip generation with a view to actively reducing the need to travel or facilitating opportunities for alternatives to private car use. This policy would contribute towards implementing the Local Plan's vision with regard to transport and is likely to have a minor positive impact on the transport objective (SA Objective 10).

H.8.1.2 By promoting the greater use of active transport and sustainable transport, the policy has the potential to have a minor positive impact on GHG emissions, pollution and health and wellbeing (SA Objectives 1, 5 and 8).

H.8.2 Policy T20: Riverside path

Policy T20: Riverside path

Waterfront development proposals will incorporate public space to facilitate walking and cycling based on Local Transport Note 1/20 (Cycle Infrastructure Design) and Sport England's Active Design guidance.

Development proposals will include riparian lifesaving equipment and appropriate suicide prevention measures where necessary.

Development proposals will demonstrate how any impacts will be mitigated.

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Policy T20: Riverside path

The design of public access around the Rochester Bridge will be informed by early consultation with the Rochester Bridge Trust.

Opportunities to provide linkages with other path networks, including Public Rights of Way, should be explored where these are compatible with other policies and do not result in impacts on coastal designated sites.

The King Charles III England Coast Path (KCIIIECP) National Trail shall be protected, with opportunities taken to enhance the route where appropriate (e.g., re-aligning the trail closer to the sea).

Public access to the coast will be retained and improved where possible (e.g., through the creation of new path links), and have regard to the Medway River Strategy.

Planning applications must highlight the route of the KCIIIECP on their proposals, where it is affected by development, and demonstrate how the trail will be positively accommodated within the development site.

New development will support the enhancement of the KCIIIECP National trail and links to the coast path, providing opportunities for active travel and outdoor recreation. Proposals that would adversely affect the KCIIIECP will not be permitted.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T20	+	0	+/-	+	+	0	0	+	+/-	+	0	+/-

H.8.2.1 Policy T20 seeks to facilitate the creation of a publicly accessible waterfront, with a riverside path for walking and cycling, as locally appropriate. The policy has the potential to encourage greater use of sustainable transport choices for a variety of purposes and has the potential to have a minor positive impact on transport (SA Objective 10).

H.8.2.2 By facilitating sustainable transport, which may also include more active travel choices, the policy has the potential to reduce GHG emissions and pollution and improve health and wellbeing. The policy has the potential to have a minor positive impact on SA Objectives 1, 5 and 8.

H.8.2.3 The policy seeks to protect and enhance The King Charles III England Coastal Path (KCIIIECP). Enhancements to the national trail could include benefits to the wider landscape setting, as well as public enjoyment of the landscape, and as such a minor positive impact on the landscape is identified (SA Objective 4).

H.8.2.4 The accompanying text to the policy recognises the importance of the KCIIIECP for local economies, providing benefits to coastal communities. However, without knowing the extent of these enhancements at this stage of the assessment it is uncertain whether these measures could positively contribute to the local economy (SA Objective 12).

H.8.2.5 The accompanying text to the policy recognises that the River Medway is associated with numerous biodiversity and heritage designations. Waterfront proposals have the potential to impact positively or negatively on biodiversity and heritage features and the potential impact is assessed as uncertain for these objectives (SA Objectives 3 and 9).

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H.8.3 Policy DM16: Chatham Waters Line

Policy DM16: Chatham Waters Line

The Policies Map shows safeguarded land for a new active travel corridor, linking the riverside around Chatham Maritime and Gillingham Riverside with Gillingham town centre. Development proposals which compromise this policy will be resisted.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM16	+	0	+/-	+/-	+	0	0	+	0	+	0	+

H.8.3.1 Policy DM16 seeks to safeguard land along the route of the Chatham Waters Line, in order to facilitate the delivery of the new active travel corridor. The policy seeks to deliver some aspects of the Local Plan vision for transport. By creating a new active transport route connecting new and existing communities and facilities along the River Medway to Gillingham Town Centre, the policy has the potential to have a minor positive impact on transport and the economy (SA Objectives 10 and 12).

H.8.3.2 By encouraging active lifestyles and offering sustainable transport choices, the policy may help to reduce private car use and lead to a minor positive impact on climate change mitigation, pollution and health and wellbeing (SA Objectives 1, 5 and 8).

H.8.3.3 Should redevelopment of the route come forward, there may be positive impacts on landscape and townscape character. Some disused railway routes develop biodiversity interest, which could be lost or degraded through implementing the new route. The policy sets out the need to safeguard the land for the route, and as such, the impacts on landscape character and biodiversity are uncertain (SA Objectives 3 and 4).

H.8.4 Policy DM17: Grain Branch

Policy DM17: Grain Branch

The Policies Map shows safeguarded land for new rail infrastructure, including a station, route alignment and buffer stop zone.

Development proposals which compromise this policy will be resisted.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM17	+	0	0	0	+	0	0	0	0	++	0	+

DRAFT

H.8.4.1 The Local Plan spatial strategy seeks to deliver new growth on the Hoo Peninsula, alongside the delivery of infrastructure improvements. Policy DM17 seeks to safeguard land required for this infrastructure, including the potential for improvements to the Grain Branch line to reinstate passenger services and provide a new train station at Sharnal Street.

H.8.4.2 Current commuting patterns from the Hoo Peninsula indicate high use of private vehicles to access train stations in Strood, Ebbsfleet and Gravesend, which contribute to congestion on the Four Elms roundabout[22]. There is an AQMA associated with this part of the road network due to traffic congestion. Reinstating passenger train services along the Grain Branch line, alongside the delivery of a new train station, would create greater sustainable travel choices for accessing employment opportunities while reducing traffic congestion and associated pollution. Should the new train station come forward, there is the potential for the policy to have a major positive impact on transport (SA Objective 10) and a minor positive impact on climate change mitigation, pollution and employment (SA Objectives 1, 5 and 12) by offering more sustainable transport choices.

H.8.5 Policy T21: Riverside infrastructure

Policy T21: Riverside infrastructure

Riverside infrastructure associated with the transport of minerals, waste and other defined materials will be safeguarded in accordance with national planning policy.

The existing network of piers, jetties, slipways, steps and stairs will be safeguarded to support the marine heritage sector and to accommodate visiting vessels and river taxi services while any new facilities will be encouraged.

Gillingham Pier and Sun Pier will be maintained as commercial piers accessible for and supporting large historic vessels.

The 'agent of change' principle applies, whereby existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established, and where the operation of an existing business or facility could have a significant adverse effect on new development in its vicinity, the applicant should to provide suitable mitigation to address these matters.

The design of new facilities around the Rochester Bridge will be informed by early consultation with the Rochester Bridge Trust.

Riverside infrastructure will be required to comply with the requirements of conserving the designated environmental features of the estuaries and river. Development must demonstrate adequate mitigation and no loss of protected or priority habitats or species, unless the impacts are not significant at a waterbody scale.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T21	0	0	0	0	0	+	0	0	+/-	+	0	++

[22] Available at: https://www.medway.gov.uk/HooDevelopmentFramework [Date accessed: 03/03/25]

H.8.5.1 Medway's economy benefits from being able to offer access to coastal and riverside transport and associated infrastructure, such as ports and wharves. The relationship of Medway to the River Thames and River Medway also offers opportunities for river taxis and tourist vessels. By seeking to protect riverside infrastructure, Policy T21 has the potential to have a major positive impact on the economy and a minor positive impact on access to sustainable transport choices (SA Objectives 12 and 10).

H.8.5.2 By seeking to protect infrastructure associated with the river, including wharves, the policy has the potential to contribute to the protection of infrastructure to facilitate mineral extraction and transportation. This will be likely to have a minor positive impact on natural resources (SA Objective 6).

H.8.5.3 While there is the potential for adverse impacts on biodiversity as a consequence of coastal and river activities, the policy seeks to protect Medway's coastal and wetland habitats and associated protected species. The policy has the potential to have a negligible impact on biodiversity and geodiversity (SA Objective 3).

H.8.5.4 As a consequence of the historic relationship between Medway and its rivers, there are numerous heritage assets associated with its waterways. The policy states that "*new facilities will be encouraged*". There is the potential for negative impacts on heritage assets as a result of the development of new riverside infrastructure, depending on the specific nature and design of such development. The potential impact on cultural heritage is uncertain (SA Objective 9).

H.8.6 Policy T22: Marinas and moorings

Policy T22: Marinas and moorings

Proposals for upgraded or new high quality marina facilities and amenities will be supported in principle. Planning permission for marinas and moorings will be granted if the application demonstrates how the proposed development:

- Will meet a proven need.
- Is required for the proper functioning of an existing facility or to enhance and improve access to the waterway.
- In an urban location, is supported by the provision of other commercial leisure uses at an appropriate scale, without undermining the role, vitality and vibrancy of town centres.
- Will have adequate land-based utility infrastructure and supporting facilities, including sewage, waste, water, secure storage and washing.
- Will not conflict with neighbouring uses, have a significant adverse impact or result in unacceptable environment consequences. A detailed HRA may be required.
- Has specific regard to the Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest and the Marine Conservation Zone.
- Adheres to the council's policy for the North Kent Strategic Access Management and Monitoring Scheme – 'Bird Wise'.
- Will not result in increased flood risk further downstream or elsewhere.
- Will not adversely impact on amenity, particularly with regard to the waterways, in terms of access, servicing and car parking provision.
- Will not have a significant adverse impact on the highway network.

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	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T22	0	0	0	0	0	0	0	0	+/-	0	0	+

H.8.6.1 By supporting applications relating to marinas and moorings, Policy T22 has potential to have a minor positive impact on the economy (SA Objective 12), both directly through the creation of employment opportunities in associated industries, and indirectly through the additional need for retail and other commercial facilities.

H.8.6.2 The policy sets out the protection of sites designated for biodiversity interest associated with the water environment, including European sites, SSSIs and the Marine Conservation Zone. The policy could potentially help to reduce the potential for adverse effects on these biodiversity assets, resulting in an overall negligible impact on SA Objective 3.

H.8.6.3 The policy seeks to protect amenity, "*particularly with regard to the waterways, in terms of access, servicing and car parking provision*", and would help to ensure that any development proposals do not undermine the vibrancy of town centres. These measures would help to reduce the potential for adverse effects on the landscape or townscape character; a negligible impact is identified (SA Objective 4).

H.8.6.4 The policy seeks to protect against adverse impacts on the highways network, potentially leading to a negligible impact on transport and accessibility (SA Objective 10).

H.8.6.5 As a consequence of the historic relationship between Medway and its rivers, there are numerous heritage assets associated with its waterways. There is the potential for negative impacts on heritage assets as a result of the development of new or extended marinas and moorings, depending on the specific nature and design of such development. The potential impact on the cultural heritage objective is uncertain (SA Objective 9).

H.8.6.6 The policy seeks to protect against pollution incidents by requiring "*land-based utility infrastructure and supporting facilities, including sewage, waste, water, secure storage and washing*". The policy has the potential to have a negligible impact on pollution and waste (SA Objective 5).

H.8.6.7 By seeking to prevent any increase in flood risk in other locations, the policy has the potential to have a negligible impact on surface water and flood risk (SA Objective 2).

H.8.7 Policy T23: Aviation

Policy T23: Aviation
Rochester Airport will provide an enhanced aviation facility for business, public service, training, heritage and leisure uses, and support the development of a strategic gateway and an economic hub.

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	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T23	0	0	0	0	0	0	0	0	0	+	+	+

H.8.7.1 Policy T23 seeks to safeguard the aviation facility at Rochester Airport to provide services which reflect the existing service range, including business use, training, leisure and heritage flights. There are no proposals in the policy for airport expansion or for commercial services.

H.8.7.2 Policy T23 has the potential to have a minor positive impact on the economy objective through the creation of employment opportunities associated with the aviation services undertaken at Rochester Airport (SA Objective 12).

H.8.7.3 The policy seeks to provide an "*enhanced aviation facility*" including services for business travellers, amongst others, and therefore maintains existing travel choices in Medway. There is the potential for a minor positive impact on the transport objective (SA Objective 10).

H.8.7.4 Rochester Airport is used for training purposes. By safeguarding the site there is the potential for a minor positive impact on the diversity of education and training opportunities in the authority area (SA Objective 11).

H.8.7.5 Aviation-related GHG emissions are assessed as part of the national UK carbon budget, rather than at a local authority level. Globally, aviation accounts for approximately 2.5% of GHG emissions[23]. Assuming there are no plans for the expansion of services and by protecting the remaining runway at Rochester Airport the policy is likely have a negligible impact on changes to GHG emissions (SA Objective 1).

H.8.7.6 There are no proposals to expand the existing airport or the number of services. Impacts on biodiversity, landscape, heritage and pollution are likely to be no greater than existing impacts. The potential impacts of the policy on these objectives are likely to be negligible (SA Objectives 3, 4, 5 and 9).

H.8.8 Policy T24: Urban logistics

Policy T24: Urban logistics
Unless allocated for alternative development, the loss of existing B8 (storage or distribution) uses will be resisted, unless it can be demonstrated that the site is no longer suitable for this activity, for example due to amenity issues.

[23] Available at: https://ourworldindata.org/global-aviation-emissions [Date accessed: 03/03/25]

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	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T24	+/-	0	0	0	+/-	0	0	0	0	+/-	0	+

H.8.8.1 Policy T24 seeks to protect existing sites for B8 storage and distribution purposes. The accompanying text to the policy sets out the increasing need for these uses based on increased courier services and the requirements for associated logistics space. The policy has the potential to enhance access to local employment opportunities and have a minor positive impact on the economy (SA Objective 12).

H.8.8.2 The use of logistics services has the potential to have mixed impacts on transport and associated GHG emissions and pollution. There is the potential for increased vehicle trips in the Plan area, with associated increases in congestion, air and noise pollution and GHG emissions. There is also the potential for greater use of more sustainable low-carbon vehicles for the 'last mile' of delivery. There are uncertain, mixed impacts on GHG emissions, pollution and transport (SA Objectives 1, 5 and 10).

H.8.9 Policy T25: User hierarchy and street design

Policy T25: User hierarchy and street design

Planning permission for major developments will be granted if the Design and Access Statement submitted as part of the application demonstrates how the proposal:

- adheres to the user hierarchy (see Figure 7);
- provides for an appropriate range of streets and spaces, meeting the needs of all users;
- integrates with adjacent built-up areas, with no 'ransom strip' or other gap left between the adopted highway and the site boundary in order to accommodate future changes;
- promotes active frontages, particularly in relation to publicly-accessible areas, for the purposes of natural surveillance and creating characterful places;
- allows for loading access for retailers; and
- ensures appropriate street furniture and signage is included only when necessary for reasons of safety, orientation or comfort of residents and visitors.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T25	+	0	0	+	+	0	0	+	0	+	0	0

H.8.9.1 Policy T25 seeks to place emphasis on the need to consider pedestrians and cyclists first when developing layouts for new development, with access to public transport considered next and finally use of private cars.

H.8.9.2 The policy has the potential to reduce use of private cars within the proposed development and encourage use of active travel and sustainable modes of transport. The policy has the potential to lead to a minor positive impact on access to sustainable transport choices (SA Objective 10).

H.8.9.3 By seeking to support sustainable transport choices, the policy has the potential to lead to a reduction in air and noise pollution, as well as a reduction in GHG emissions associated with private car use and a minor positive impact on climate change mitigation and pollution (SA Objectives 1 and 5).

H.8.9.4 By supporting sustainable transport choice in the design of new development, the policy has the potential to increase active travel and the associated health and wellbeing benefits of increased activity and community interaction. There is the potential for a minor positive impact on SA Objective 8. It is recognised that increases in street permeability and use of sustainable transport may be associated with perceptions of increased risk of exposure to crime or anti-social behaviour. By seeking to promote 'active frontages' and 'natural surveillance' the policy seeks to reduce the likelihood of these negative impacts on communities.

H.8.9.5 The policy seeks to create 'natural surveillance' by providing active frontages in the design layout of development and in turn contribute to the creation of characterful places. The policy has the potential to have a minor positive impact on the landscape and townscape objective (SA Objective 4).

H.8.9.6 **Recommendation:** Policy T25 only applies to those developments requiring a Design and Access Statement, often major development. The sustainability performance of the policy could be enhanced by stating how the policy can be applied to smaller developments that do not require a Design and Access Statement, where feasible.

H.8.10 Policy T26: Accessibility standards

Policy T26: Accessibility standards

Major and strategic development proposals for new homes, where they are not allocated will describe how they meet the following accessibility standards within 15 minutes for local destinations:

Local destination	Mode		
Primary school			
Secondary school			
'Top-up' grocery shopping			
Places to socialise			
Places to exercise			

Access to shared mobility, such as e-bikes, e-scooters and electric vehicle car clubs is encouraged through a Travel Plan for medium and longer distance journeys.

Strategic and major development proposals for new homes will also be planned to enable the maximum walking distances to bus stops as part of medium to longer distance journeys:

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Policy T26: Accessibility standards

Situation	Maximum walking distance (metres)
Core bus corridors with two or more high-frequency services	500
Single high-frequency routes (at least every 12 minutes)	400
Less frequent routes	300
Town/city centres	250

The journey times and distances will be demonstrated by the characteristics of the route itself, rather than as the crow flies / notional circular catchments.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T26	+	0	0	0	+	0	0	+	0	+	+	0

H.8.10.1 Policy T26 seeks to ensure that major residential development locates residents within a 15-minute sustainable travel time from everyday services, including schools, top-up grocery shopping and places to exercise and socialise. The policy also requires major residential development to be located within defined maximum walking distances to bus stops.

H.8.10.2 Access to shared mobility is encouraged through the use of Travel Plans, the requirements for which are set out in Policy DM18.

H.8.10.3 By seeking to create new communities with sustainable access to meet some of their daily needs, the policy has the potential to have a minor positive impact on access to sustainable transport (SA Objective 10) and supporting development which facilitates residents having sustainable access to primary and secondary schools (SA Objective 11).

H.8.10.4 The policy has the potential to reduce reliance on private car use and lead to minor positive impacts on associated GHG emissions and air and noise pollution (SA Objectives 1 and 5).

H.8.10.5 By encouraging greater use of modes of active travel, the policy has the potential to encourage greater levels of exercise and community interaction, leading to a minor positive impact on health and wellbeing (SA Objective 8).

H.8.10.6 **Recommendation:** Policy T26 could be enhanced through including reference to public transport links to train stations for onward travel.

H.8.11 Policy DM18: Transport assessments, transport statements and travel plans

Policy DM18: Transport assessments, transport statements and travel plans

Development proposals that will generate a significant amount of movement will be supported by a Transport Assessment, Transport Statement and/or a commitment to provide a Travel Plan.

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Policy DM18: Transport assessments, transport statements and travel plans

The requirement for a Transport Assessment or Transport Statement will need to be agreed with National Highways for development proposals that impact on the Strategic Road Network. National Highways, in conjunction with the council as local highway authority, will agree the scope of the Transport Assessment or Transport Statement at an early stage. In accordance with the tests set out in the NPPF, National Highways will need to be satisfied that development proposals will not materially affect the safety, reliability and/or operation of the Strategic Road Network.

Early discussion will provide an initial judgement on the need for and scope of a Travel Plan. The following aspects of a Travel Plan should be specified in a Section 106 agreement, or the subject of a condition, as appropriate:

- A timetable for the preparation, implementation, monitoring and review of the Travel Plan.
- The appointment and funding of a Travel Plan Coordinator to be responsible for the management of the Travel Plan, including the relationship with the local planning authority and/or other key stakeholders.
- The overall aim and objectives (e.g., to determine mode share targets) of the Travel Plan.
- Requirements for occupiers and future occupiers.
- The measures to be implemented, such as the provision of transport infrastructure or services.
- A monitoring and review programme for surveys.
- Any sanctions where the targets are not being met, and how and when they should be applied.
- Any procedure for the variation by means of amendment, substitution or addition of targets or measures.

Development proposals on the Hoo Peninsula will adhere to an Area-wide Travel Plan.

Public Rights of Way will be scoped in to a Transport Assessment, Transport Statement or Travel Plan.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM18	+	0	0	0	+	0	0	+	0	++	+	+

H.8.11.1 Policy DM18 sets out the requirements for Transport Assessment, Transport Statements and Travel Plans when proposed development is likely to lead to significant transport movements, in line with national planning policy. Planning obligations are proposed to secure the measures within Travel Plans.

H.8.11.2 The requirement for Transport Assessments or Transport Statements seeks to ensure that the new levels of traffic do not adversely impact on the safety, reliability or operation of the road network. Where required, Travel Plans seek to ensure more sustainable modes of transport associated with new development, including walking and cycling. Monitoring measures seek to ensure that where the Travel Plan objectives are not met, alternative measures are put in place. Policy DM18 is likely to have a major positive impact on transport and accessibility (SA Objective 10).

H.8.11.3 Travel Plans would seek to provide sustainable transport choices for residents of new developments and encourage more active travel, with opportunities for community interaction. There is potential for the policy to have a minor positive impact on health and wellbeing (SA Objective 8). By seeking to encourage greater use of sustainable transport, the policy could contribute towards a reduction in GHG emissions and air and noise pollution, resulting in a minor positive impact on SA Objectives 1 and 5.

H.8.11.4 Transport Assessments or Statements and Travel Plans have the potential to result in more sustainable access to schools and employment opportunities and lead to a minor positive impact on the education and economy objectives (SA Objectives 11 and 12).

H.8.12 Policy DM19: Vehicle parking

Policy DM19: Vehicle parking

Planning applications for residential and non-residential development will be determined in accordance with the adopted vehicle parking standard, including future revisions, subject to consideration of site-specific circumstances or material considerations that indicate otherwise.

The council's current vehicle parking standard is set out in Appendix B. This is anticipated to be updated over the plan period. The 2010 addendum provides for flexibility in the application of the vehicle parking standard in order to optimise the density of development and reduce travel demand. The Council's current vehicle parking standard represents a starting point which will be considered in the context of the prevailing national planning policy for parking at the time decisions are taken on applications.

Vehicle parking will be consistent with any maximum vehicular trip generation set out in an associated Travel Plan.

For residential development, Design and Access Statements will demonstrate how the proposed vehicle parking adheres to best practice design principles. This is comprehensively set out in the Chartered Institute for Highways and Transportation and the Building for a Healthy Life guidance. Vehicle parking (both on-street and off-street) in new developments must not dominate the street scene. Podium parking for communal parking may offer an acceptable solution. Opportunities for on-street parking must be supported by a parking stress survey.

Parking areas should incorporate appropriate sustainable urban drainage measures and developers ensure their design does not increase flood risk locally. Where garages are to be provided, additional curtilage and/or on-street parking will be required.

Electric vehicle charging points will be provided in line with the relevant Building Regulations. There may be circumstances where compliance with this aspect of the policy would make the development unviable. In each case these circumstances would need to be fully demonstrated to warrant a departure from compliance with this aspect of the policy. Any departure should be able to demonstrate how on-street and off-street parking bays will be capable of accommodating electric vehicle charging points.

Electric vehicle car club membership is encouraged through a Travel Plan. Some parking bays will need to be set aside solely for car club vehicles; they will be located to achieve the greatest exposure and use of the vehicles, subject to any specific requirements of the operator.

If on-street controls are needed, the potential for parking in neighbouring streets will need to be considered. Residents in neighbouring streets will need to be involved in preparing any Traffic Regulation Order (TRO). A developer contribution will be sought for any TRO, along with any additional enforcement.

Where there are no on-street restrictions proposed, a design-led allowance for on-street unallocated parking is preferred for visitors, deliveries and any additional vehicles owned by residents.

Policy DM19: Vehicle parking

Retirement and other residential developments with particular occupancy controls will be expected to take a site-specific approach to vehicle parking provision.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM19	+	0	0	+	0	+	0	0	0	+	0	+

H.8.12.1 Policy DM19 seeks to ensure new residential and non-residential developments provide car parking spaces in accordance with the latest standard published by the Council. The policy states that a flexible approach will be applied "*in order to optimise the density of development and reduce travel demand"* and will ensure parking provision *"will be consistent with any maximum vehicular trip generation set out in an associated Travel Plan*".

H.8.12.2 Adequate car parking provision to meet identified needs can be helpful in avoiding undesirable parking practices that may occur when parking spaces are restricted, such as inconsiderate parking which may restrict street accessibility or cluttered streets which may impact on visual amenity. In urban areas, where capacity for additional traffic is limited and/or where there are areas of poorer air quality and there are greater opportunities for sustainable transport choices, the policy allows for flexibility in the application of the car parking standard.

H.8.12.3 By seeking to provide adequate car parking to meet needs while also allowing flexibility in car parking provision to support the use of sustainable transport, Policy DM19 has the potential to have a minor positive impact on transport and accessibility (SA Objective 10) and help to ensure accessibility to town centres and support town centre vibrancy, supporting the local economy (SA Objective 12).

H.8.12.4 The policy has flexibility to allow for higher density development in urban areas, supporting an efficient use of land. The policy has the potential for a minor positive impact on natural resources (SA Objective 6).

H.8.12.5 The policy seeks to ensure electric vehicle charging points will be provided, unless this impacts on the viability of the development. Electric vehicle car club membership would be encouraged through Travel Plans, where travel plans are required. The policy has the potential to contribute to a reduction in GHG emissions and have a minor positive impact on climate change mitigation (SA Objective 1).

H.8.12.6 Car parking areas have the potential to have mixed impacts on landscape and visual amenity. The policy states that for residential areas, car parking should be in accordance with the Chartered Institute for Highways and Transportation and the Building for a Healthy Life guidance. By seeking to follow best practice design guidance, the policy has the potential to have a minor positive impact on landscape and townscape (SA Objective 4).

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H.8.13 Policy DM20: Cycle parking and storage

Policy DM20: Cycle parking and storage

Planning applications for residential and non-residential development will be determined in accordance with the adopted cycle parking standard, subject to consideration of site-specific circumstances or material considerations that indicate otherwise.

The Council's current cycle parking standard is set out in Appendix B. This is anticipated to be updated over the plan period.

Long-term cycle parking facilities for residents, visitors and/or employees of the development will be conveniently located, safe to use, secure, weatherproof and be well integrated into the building and/or layout of the site. In line with Local Transport Note 1/20 (Cycle Infrastructure Design), five per cent should be provided for non-conventional cycles.

Short-term cycle parking facilities should be conveniently located in relation to the public realm, provide effective security for cycles and be safe to use.

For dwelling houses, individual provision should be made within the private garden area.

For flatted developments and commercial uses, communal cycle stores should be provided in individual cages or containers, situated in secure locations where access is restricted to residents. Where on-site provision is demonstrably not practical, a developer contribution towards secure on-street residential parking or maintenance of strategic cycle routes will be sought.

'Building for a Healthy Life' provides further design guidance in relation to the location and design of cycle parking in residential and non-residential developments to encourage greater use of cycling or scooters as a travel option.

Access to shared mobility, such as e-bikes and e-scooters, is encouraged through a Travel Plan.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM20	+	0	0	+/-	+	0	0	+	0	+	+	+

H.8.13.1 Policy DM20 sets out the requirements for cycle parking in new residential and non-residential development in accordance with the latest parking standards published by the Council. Cycle parking areas may accommodate shared mobility, such as e-scooters as part of a Travel Plan. The policy has the potential to encourage more sustainable and active travel choices and have a minor positive impact on transport and accessibility (SA Objective 10) and health and wellbeing (SA Objective 8).

H.8.13.2 By encouraging the use of more sustainable transport choices, the policy has the potential to contribute towards reducing GHG emissions and pollution associated with use of private vehicles. The policy has the potential to have a minor positive impact on SA Objectives 1 and 5.

H.8.13.3 The policy supports opportunities for sustainable transport to schools and places of employment and has the potential to have a minor positive impact on SA Objectives 11 and 12.

H.8.13.4 Cycle parking areas have the potential to have mixed impacts on townscape character, depending on the design, location and landscaping. Therefore, the policy has uncertain impacts on the townscape objective (SA Objective 4).

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H.9 Health, communities and infrastructure

H.9.1 Policy T27: Reducing health inequalities and supporting health and wellbeing

Policy T27: Reducing health inequalities and supporting health and wellbeing

The Council will maintain and improve the health and wellbeing of our residents, encouraging healthy lifestyles and tackling the causes of ill health and inequalities. This will be achieved by:

- Promoting active and healthy lifestyles through the design of new development, including applying Active Design principles, increasing access to and improving the green and blue infrastructure network, enhancing the quality and accessibility of play and recreation opportunities, expanding the network of attractive walking, wheeling and cycling routes and public transport.
- Reducing and mitigating drivers of poor health and health hazards such as those associated with climate change, poor air quality, noise, ground and water contamination, flooding, crime and hazardous uses.
- Supporting to reduce loneliness and social isolation by creating inclusive, well-connected centres and neighbourhoods where services and facilities are co-located with cultural activites and intervention, including for older people and those with different abilities, which have a proven impact on reducing health inequalities.
- Improving and creating better access to education, training and employment and promoting a stronger local economy
- Supporting good mental health by tackling deprivation, promoting social interaction through the design of high-quality public spaces and places, and improving access to nature and green spaces
- Providing decent and affordable homes within an attractive environment
- Supporting the delivery of essential community services
- Creating a healthy food environment by increasing opportunities for growing food, controlling the location of, and access to, unhealthy eating outlets, and improving the accessibility of retail facilities selling fresh food.
- Providing good access for all to health and social care facilities.

The Council will support development in Medway that provides opportunities for healthy lifestyles, contributes to the creation of healthier communities, and helps reduce health inequalities. In doing so, will need to satisfy the following:

- Major development will be permitted where it provides facilities and services that support health objectives with priority given to new or enhanced existing health, social care, community, sport, and leisure facilities.
- Major development must ensure that health care facilities provided are of an appropriate scale in relation to the proposal and meets the needs of residents. These health care facilities must be located alongside other community services and facilities to foster a sense of community, improve accessibility, promote sustainable travel, and enable combined trips.
- Development that protects and increases the availability of allotments and private and communal gardens for exercise, recreation and for healthy locally produced food will be supported.

Policy T27: Reducing health inequalities and supporting health and wellbeing

- In exceptional circumstances, health, social care, community, sport and leisure facilities may be replaced by another appropriate use or lost where there is a demonstrated overprovision. This must be justified and supported by evidence showing the use is not needed, demonstrating the following:

a) Community engagement has been undertaken to inform the preferred use within the proposal's red line boundary of the development area as a replacement

b) Consideration has been given to repurposing the built form or providing new facilities to support health objectives with priority given firstly to health, social care, community, sports and leisure facilities

- Development must retain or re-provide existing health, social care, community, sport, and leisure facilities.
- All major development proposals or those that the Council would consider having the potential to have a significant impact on health and wellbeing must be supported by a Health Impact Assessment (HIA). Proposals will be supported where it can be demonstrated that the design of the scheme has been informed by the conclusions of the Health Impact Assessment.
- Development that would have an unacceptable impact on health or wellbeing will not be permitted.
- Development proposals will help to create healthy and sustainable places, recognising the cumulative effect individual units and specific uses can have on the success of places. The Council will seek to manage the concentration and mix of specific premises to support healthier communities. In particular, the location and concentration of the following types of development will be carefully managed to avoid possible adverse impacts on health and wellbeing:
  a) Hot food takeaways
  b) Off-licences
  c) Facilities that encourage smoking, for example smoking shelters and shisha lounges
  d) Payday lenders, betting shops and amusement arcades

  Planning applications will be refused where hot food takeaways and fast food outlets are within walking distance of locations where children and young people congregate or locations where a concentration of uses is having an adverse impact on local health, pollution or anti-social behaviour. The development of hot food takeaways, or of hybrid uses incorporating such uses, will not be permitted in wards where more than 10% of year 6 pupils are classified as obese. Where this is acceptable, the Council will only consider granting planning permission where:
  i. The location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area;
  ii. there is no harm or loss of amenity to the living conditions of nearby residents, including that created by noise and disturbance from other users and their vehicles, odour and litter;
  iii. and parking and traffic generation is not a danger to other road users, public transport operators or pedestrians
- Where uses identified in points A-D above can be justified, acceptability will be informed by the location proposed. Locations away from places that are regularly frequented by younger people such as schools and youth facilities, and where they are likely to worsen health inequalities are considered preferable.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T27	+	0	0	0	0	0	0	++	0	+	0	0

H.9.1.1 Policy T27 seeks to promote good physical and mental health for residents of Medway and reduce health inequalities, through addressing some of the underlying causes of poor health in the Plan area.

H.9.1.2 The policy states that new development should be in areas where "*primary health care facilities must be located alongside other community services and… promote sustainable travel, and enable combined trips*". This will help to ensure that development is well located with respect to healthcare infrastructure, such as GP surgeries, allowing travel by walking or public transport and helping to reduce the reliance on private cars to reach these essential facilities. This would be beneficial to human health and seeks to ensure that all new residents have good access to healthcare facilities.

H.9.1.3 Policy T27 aims to ensure that new development provides access to public greenspaces and sports facilities through an "*expanding network of attractive walking, wheeling and cycling routes*". These measures will be expected to provide residents with access to a diverse range of natural habitats. Access to open and natural spaces is likely to have benefits to mental and physical wellbeing. Facilitating active travel will help to encourage residents to live healthier lifestyles and provide opportunities for outdoor exercise, resulting in benefits for health and wellbeing. This could also result in a minor positive impact on transport (SA Objective 10) and climate change mitigation (SA Objective 1) through encouraging more sustainable travel choices.

H.9.1.4 The policy also encourages developers to seek opportunities to integrate outdoor activity and communal facilities, such as allotments and community gardens. This will be likely to provide greater opportunities for social interaction and promote community cohesion. This may also help to provide new and existing residents with a greater sense of place and help to tackle social exclusion.

H.9.1.5 Overall, a major positive impact in relation to human health and wellbeing is identified (SA Objective 8).

H.9.2 Policy T28: Existing open space, outdoor sports and play spaces

Policy T28: Existing open space, outdoor sports and play spaces

Proposals for development which would result in the loss of publicly accessible open space will only be permitted if:

a. There would be no material harm to the contribution the open space makes to the visual or recreational amenity of the area, and the council has assessed the open space as making no positive contribution to its overall strategy on open space.

b. Where there would be material harm, this would be balanced against demonstrable need for the development in that specific location. Should there be no alternative site available to accommodate the

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Policy T28: Existing open space, outdoor sports and play spaces

proposed development, any harm must be offset by the provision of other open space of comparable accessibility, quality, size, character and usability in a suitable location, in addition to any open space requirements of the new development.

c. The proposal is for the construction of a new building that is an essential facility for outdoor sport, recreation, play or allotment use or other open space typology uses that does not conflict with the purpose, character or accessibility of the open space.

d. The proposal is for the re-use or replacement of existing buildings provided that the proposed uses do not conflict with the purpose, character or accessibility of the open space; and any replacement building is not materially larger.

e. The proposal is for the carrying out of engineering or other operations required for public safety.

In addition, proposals for development which would result in the loss, in whole or in part, of sports or recreation facilities must also demonstrate that:

f. The site has first been considered for other sport, open space, recreation, biodiversity or community uses.

g. It has been demonstrated that the playing field is surplus to requirements having regard to the council's Open Space Assessment or Playing Pitch Strategy.

h. There is an overriding need for the proposed development which outweighs the loss and the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

i. The development is for a small part of the site; where it has been demonstrated that it will result in enhanced sport and recreational facilities.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T28	+	+	+	+	0	0	0	++	0	0	0	0

H.9.2.1 Policy T28 seeks to ensure that all existing open space with public value, and existing sports and recreation facilities, will be protected from development. The policy sets out a number of exceptions when development on open space may be considered and seeks to ensure that any loss of open space or sports facilities is replaced by equivalent or enhanced provision. The policy requires residential-led development to provide *"0.25ha of allotments per 1,000 people, i.e. in addition to 0.6ha of amenity green space"*.

H.9.2.2 Access to open space has multiple health benefits for residents, including physical health and mental wellbeing, associated with access to parks, outdoor sports, play areas, allotments and other types of recreational open space. The policy will be expected to have a major positive impact on the health and wellbeing of residents (SA Objective 8).

H.9.2.3 Open spaces and associated GI can act as carbon sinks by retaining carbon in vegetation and soils. The policy applies to a variety of open spaces and facilities, including large areas of natural greenspace to formal sports areas. Overall, the policy has the potential to lead to a minor positive impact on climate change mitigation (SA Objective 1).

H.9.2.4 By protecting existing open spaces, the policy has the potential to have indirect impacts on flooding and surface water management by potentially protecting spaces which allow for the infiltration of rainwater or water storage during rainfall events. The nature of these impacts depends on the size and character of the open space and the quantities of soft and hard surfaces. There is the potential for a minor positive impact on climate change adaptation (SA Objective 2).

H.9.2.5 The policy seeks to protect a range of existing open spaces, including play areas, allotments and parks, which may have biodiversity value or positively contribute to local character. The policy has the potential to have a minor positive impact on biodiversity and landscape and townscape (SA Objectives 3 and 4).

H.9.3 Policy DM21: New open space, outdoor sports and play spaces

Policy DM21: New open space, outdoor sports and play spaces

Residential-led developments will provide new open space, outdoor sports and play spaces according to the Fields in Trust Standards (2024), set out in Appendix X. However, residential-led developments will be required to provide 0.25 ha of allotments per 1,000 people, i.e. in addition to 0.6 ha of amenity green space. Development proposals will make appropriate space available to meet the quantity standards within the site as set out below:

a. Residential development of 10 or more dwellings will be required to provide either new and / or enhanced publicly accessible open space and recreation provision to meet the needs of their occupants. Provision should be provided based on the size of the dwellings proposed.
b. In the case of sheltered housing and special needs housing for the elderly, children's play will not be required. However, formal/informal open space provision will be sought on-site in lieu of the formal play requirement.
c. The expectation is for development to deliver provision on-site in accordance with the quantity standards above, unless in exceptional circumstances where off-site provision would better facilitate the needs of the development or where provision may not be suitable onsite due to either the nature / size of the site or specific constraints.
d. In cases where it can be demonstrated that it better meets local need, play provision may be secured through the improvement and expansion of existing facilities within the local area, rather than new play provision. This will be considered on a case by case basis for minor developments only.
e. Where off-site open space provision is required developer contributions for the enhancement and maintenance of existing open space and recreation provision will be sought with contributions secured through a S106 legal agreement.
f. Where on-site open space provision is required, the type of on-site open space provision to be delivered will be discussed with the applicant at the pre-application stage and will be dependent on the suitability of the site to accommodate different types of open space provision as well as the quantity and type of provision needed in the local area. The starting point for the consideration of provision should be based on the quantity standards.

The open space requirements will be calculated by multiplying the number of people expected to occupy the development by the standards as expressed in square metres per person.

The number of people expected to occupy the development will be based on the average household size for Medway. This will be based on the most up-to-date Office for National Statistics household projections. The standards will be reviewed where high levels of student or sheltered accommodation is proposed.

Policy DM21: New open space, outdoor sports and play spaces

Design of new open space

Proposals for development which include provision of new on site open space must ensure that new open spaces meet the following quality standards:

a. Be designed as part of the green infrastructure network, contributing to local landscape character, connecting with local routes and green corridors for people and wildlife as well as providing multi-functional benefits such as addressing surface water management priorities without compromising access.

b. Play provision is diverse to encourage all appropriate ages and play opportunities for all abilities, reflecting up to date play guidance, including Fields in Trust and Making Space for Girls.

c. Be fully accessible and inclusive provide a range of formal and informal recreation, to encourage physical activity to improve mental well-being and health inequalities that will benefit both new and existing residents.

d. Integrate formal sports provision into wider open space networks.

e. Provide meaningful and safe recreation and be sufficiently overlooked by active building frontages while maintaining appropriate distances from residential properties.

f. Link with active travel routes both within and beyond the site.

g. Be easily found and accessible walking and cycling, and public transport and road where appropriate, including by those with disabilities, with pedestrian crossings on roads where necessary.

h. Promote biodiversity and maximise opportunities to deliver benefits for nature, supporting efforts to address climate change. BNG should not take precedent over usable open space provision. BNG and open space provision should work in harmony to create both high quality open space that has a wide range of recreation benefits for new residents, as well as providing valuable wildlife habitats.

i. Where new schools are provided in major new residential developments, they should be designed to facilitate community access, with opportunities for meeting the community's outdoor sports needs explored at the outset to maximise the potential for facility provision to be made within the developments.

j. Provide adequate funding towards the long-term maintenance of new provision. A management plan for the on-site provision will also be required as relevant to the proposal to ensure the site is managed and maintained in the long-term.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM21	+	+	+	+	+	0	0	++	0	+	0	0

H.9.3.1 Policy DM21 sets out the standards for new open space provision associated with new residential and mixed-use developments. Under the policy, 'open space' includes outdoor sports facilities, equipped play areas, other types of play areas such as skate parks, parks and gardens, amenity open space, natural and semi-natural greenspace and allotments, amongst others. The standards for the provision of new open space are based on Fields in Trust Standards (2024) and have been adjusted to meet local circumstances. Proposals incorporating open space provision must also be accompanied by a long-term management plan, with funding for ongoing maintenance provided through Section 106 agreements. The policy requires residential-led development to provide *"0.25ha of allotments per 1,000 people, i.e. in addition to 0.6ha of amenity green space".*

H.9.3.2 Access to open spaces has multiple health and community benefits, including enhancing physical health and mental wellbeing, associated with the positive experiences of accessing outdoor sports, play areas, allotments and other types of recreational open space. Access to open spaces and sports facilities is likely to provide opportunities for greater community interaction and lead to better community cohesion. The policy seeks to provide a range of activity types and spaces for a range of age groups, and encourages compliance with Making Space for Girls. The need for sports pitch provision will be based on the most up-to-date Playing Pitch Strategy. The standards are based on those set out by the Fields in Trust Benchmark, which include quantity, typology, accessibility and quality measures. Overall, the policy is identified to have a major positive impact on the health and wellbeing of residents (SA Objective 8).

H.9.3.3 Open spaces and associated GI can act as carbon sinks and pollution filters, if carefully planned and managed. The policy has the potential to lead to a minor positive impact on climate change mitigation (SA Objective 1) and pollution (SA Objective 5).

H.9.3.4 The open spaces created as a result of the policy have the potential to benefit flooding and surface water management, by allowing for the infiltration of rainwater or water storage during rainfall events. The nature of these impacts depends on the design of the open space and the quantities of soft and hard surfaces. There is the potential for new natural greenspace, planned in accordance with the Green Infrastructure (GI) Framework, to become part of a habitat network that has the potential to facilitate the movement of species of plants and wildlife in response to climate change. There is the potential for a minor positive impact on climate change adaptation (SA Objective 2).

H.9.3.5 The policy seeks to create a range of open spaces, including play and sports facilities, as well as allotments and natural and semi-natural greenspace. The policy requires new open spaces to contribute to the local landscape character and promote biodiversity, by providing green corridors for wildlife. The policy has the potential to have a minor positive impact on biodiversity and landscape and townscape (SA Objectives 3 and 4).

H.9.3.6 By seeking to provide recreational opportunities in proximity to new residents, the policy could help to reduce the need to travel for residents to meet their day-to-day needs. The policy will require new open spaces to be easily accessible by public transport and link to active travel routes to ensure cycling and walking is accessible. A minor positive impact on transport and accessibility could therefore be expected (SA Objective 10).

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H.9.4 Policy T29: Community and cultural facilities

Policy T29: Community and cultural facilities

The Council recognises the importance of community and cultural facilities and the need for an appropriate range of facilities as a key component of sustainable development. The Council will seek to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors.
The Council will support appropriate development that seeks to enhance community and cultural facilities that do not have a negative impact on the surrounding amenity, historic and natural environment and transport networks.
The Council will require provision to be made for community and cultural facilities in planning for new development. Large scale residential developments will be required to provide community facilities to meet the needs of new residents and integration with existing communities where possible.
New community and cultural facilities should be located within or near the community they are intended to serve and should be appropriately located to support sustainable travel by being accessible to users by walking, cycling and public transport.
If the development is smaller scale and community facilities cannot be accommodated on site, a contribution will be sought to upgrade appropriate facilities off site, where it can be demonstrated that they are accessible to residents of the new development and that there is capacity to support the increased population.
All developments for over 10 homes will be required to contribute to upgrading community facilities in line with the council's policy on infrastructure contributions from developers.
There is a presumption against the loss of community facilities in rural and urban areas.
Any proposal which would result in the loss of a community or cultural facility will not be permitted unless:

- It has been demonstrated that it is no longer economically viable and cannot be made so, unless sufficient marketing evidence has been supplied, and.
- It can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character, sustainability and vitality of the area, or
- An alternative community facility (social infrastructure) which meets similar local needs to at least the same extent is already available.
- Additional/improved provision including the utilisation of vacant and under-used land for arts, cultural and creative purposes is provided
- In the case of healthcare facilities, these are declared as surplus to the operational healthcare requirements, as part of a published estates strategy or transformation plan of the NHS
- Proposals for new community facilities should:
    - Have safe access by cycle and walking within reasonable walking distance, public transport and car and incorporate a travel plan;
    - Have safe drop-off and pick-up provision; and
    - Avoid conflict with adjoining uses
    - Healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T29	+	0	0	0	0	0	0	+	+	+	0	0

H.9.4.1 Policy T29 aims to protect and enhance Medway's community and cultural facilities for use of current and future residents and visitors, in order to support diverse and vibrant communities and benefit quality of life.

H.9.4.2 Through supporting the provision of new and enhanced community facilities, the policy will be likely to encourage use by local residents and provide opportunities for community cohesion and social interaction, with likely benefits for human health and wellbeing.

H.9.4.3 Furthermore, the policy states that new community and cultural facilities should provide "*safe access by cycle and walking within reasonable walking distance, public transport and car and incorporate a travel plan*". The policy also promotes the inclusion of new community facilities on-site within larger residential developments. This will help to ensure that the facilities are accessible via sustainable travel modes and could contribute towards a reduced reliance on private car use and associated GHG emissions. By ensuring that new facilities incorporate "*safe drop-off and pick-up provision*" this policy could also help to avoid issues with congestion and road safety. Therefore, a minor positive impact on health and wellbeing (SA Objective 8) transport and accessibility (SA Objective 10) and climate change mitigation (SA Objective 1) will be expected, due to the promotion of active travel as well as the potential improvement in air quality associated with a lower volume of traffic generation.

H.9.4.4 Community and cultural facilities could include buildings with historic value, for example places of worship and village halls. Through ensuring existing facilities are retained and enhanced, and supporting continued use of these facilities by the local communities, the policy could help to indirectly protect designated or non-designated heritage assets from harm. This could potentially result in a minor positive impact on cultural heritage (SA Objective 9).

H.9.5 Policy S24: Infrastructure delivery

Policy S24: Infrastructure delivery

Development coming forward in Medway will be expected to deliver new or improved infrastructure, to mitigate the impact of development. This will be achieved through the use of planning obligations and/or contributions and their use as defined in national policy and guidance, and as set out in the latest Medway Guide to Developer Contributions and Obligations. Infrastructure includes requirements having regard to the details set out in the latest Infrastructure Delivery Plan, as well as studies on leisure, green infrastructure, neighbourhood plans and development orders and other needs assessments.

To support sustainable development and the delivery of infrastructure planning permission will be granted for new developments in the following circumstances:

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Policy S24: Infrastructure delivery

- Applications can demonstrate that there is sufficient infrastructure capacity to support what is proposed.
- Development is phased to reflect the timely delivery of infrastructure to serve and support future occupants and users.
- Developer contributions and/or obligations are agreed that will mitigate the impact of the development.
- New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.
- To achieve timely delivery of infrastructure the Council will expect infrastructure to be delivered in the following sequence unless proven otherwise through the application process via the viability appraisal process below:
    - Onsite delivery of infrastructure ahead of occupation
    - Onsite phased delivery of infrastructure
    - Financial developer contribution for offsite provision

In the event that a developer considers that providing or contributing towards infrastructure requirement would not be achievable the Council would expect the following:

- The submission of an "open book" viability appraisal. Any sensitive information which could compromise the applicants operations in any way will remain confidential from the public;
- Proof that the cost of potential infrastructure had been accounted for within the purchase price of the site.

If development is phased, the Council would expect a reassessment of the viability of the site for financial contributions to be undertaken at the submission of details for each phase.

Any viability appraisal is to be tested by the council's independent advisors and this is to be paid for by the applicant.

Infrastructure provision will require collaborative working with infrastructure providers including Medway Council, the NHS, and utilities providers amongst others. Developers and landowners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered at the outset and is then mitigated, at the appropriate time, in line with their published policies and guidance.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S24	+	+	0	++	+	0	0	++	0	++	++	+

H.9.5.1 Policy S24 seeks to ensure that infrastructure needs associated with new development are met. Meeting infrastructure needs in the Local Plan area will be based on the Infrastructure Delivery Plan (IDP) and delivered through Section 106 agreements and planning conditions.

H.9.5.2 Policy S24 states that "*development coming forward in Medway will be expected to deliver new or improved infrastructure, to mitigate the impact of development*" and supports proposals which meet the infrastructure planning criteria outlined within the policy, within the relevant plans and documents, including the Medway IDP and the Green and Blue Infrastructure Framework, and those which align with relevant studies and assessments.

H.9.5.3 The policy has the potential to support the delivery and maintenance of GI associated with new developments, which may include the provision of publicly accessible open spaces, allotments, enhancements to Country Parks and enhancements to the walking trails and PRoW network. There is the potential for the policy to have a major positive impact on landscape and townscape (SA Objective 4).

H.9.5.4 The delivery of services and facilities to support new communities may include health care services, leisure facilities (such as improvements to sports facilities) and other GI. The policy has the potential to have a major positive impact on the health and wellbeing of new communities (SA Objective 8).

H.9.5.5 Section 106 agreements are likely to lead to the delivery of improvements to transport infrastructure, including improvements to highways and key junctions. Developer contributions could deliver improvements to public transport, including enhancements to bus services and other active transport, such as cycle routes and footpaths. There is the potential for a major positive impact on transport through increasing sustainable transport choices and reducing journey times (SA Objective 10). A consequent minor positive impact on climate change mitigation (SA Objective 1) could be seen associated with a reduction in transport-associated emissions.

H.9.5.6 Developer contributions would also be used to ensure sufficient school places are available to meet the needs of the new communities, including Early Years and Special Educational Needs, which could potentially lead to a major positive impact on education (SA Objective 11).

H.9.5.7 Developer contributions are likely to help to support infrastructure improvements associated with the transport network and would support economic activity and encourage inward investment in the Plan area. The policy has the potential to have a minor positive impact on the economy (SA Objective 12).

H.9.5.8 Section 106 agreements will be used to fund the maintenance of existing flood defences, as part of the strategy to maintain climate resilience. There is the potential for a minor positive impact on climate change adaptation and resilience to flood risk (SA Objective 2).

H.9.5.9 Developer contributions will be likely to be used to fund new waste services to meet the needs of new residents. There is the potential for a minor positive impact on waste (SA Objective 5).

H.9.6 Policy DM22: Digital communications

Policy DM22: Digital communications
For Medway to achieve its economic and social potential and maintain its status as a well-connected place in which to live and work, the Council will seek to develop and enhance the provision of broadband and telecommunications infrastructure coverage across Medway. All new major development proposals (residential and commercial) should:

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Policy DM22: Digital communications

- Ensure that there is full fibre to the premise;
- Have confirmed with broadband providers that a connection can be made to the development;
- Be ready for 5G technology and gigabit capable broadband with the appropriate infrastructure in place; where relevant,
- Be ready for any future technological advancements in compliance with national guidance

Evidence of this shall be submitted as part of a planning application.

If none of the above is possible, reasoned justification as to why this is not possible should be given as part of a planning application and then alternative methods to deliver gigabit capable broadband used instead. These include other forms of infrastructure, such as facilities supporting mobile broadband and wi-fi to support gigabit capable broadband.

Exceptions to this policy will need to be justified with evidence submitted to the Council for consideration.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM22	+	0	0	0	+	0	0	0	0	+	+	++

H.9.6.1 Policy DM22 supports the enhancement and provision of "*broadband and telecommunications infrastructure coverage across Medway*", including being prepared for 5G technology for all new development. This will be likely to ensure that site end users have good internet access and access to mobile voice calls.

H.9.6.2 By seeking to ensure that new development has access to high-speed broadband, the policy is likely to support a greater range of businesses and employment opportunities for local residents as well as providing opportunities for home working or hybrid working. Further benefits include improving the quality of education and the enhancement of remote access learning, particularly in more rural locations with currently limited access. There is the potential for minor positive impact in relation to education and a major positive impact on the economy (SA Objectives 11 and 12).

H.9.6.3 By facilitating home working, hybrid working and online education, the policy has the potential to reduce the number of related trips in private vehicles and lead to a reduction in GHGs and other vehicle-related pollution. There is the potential for a minor positive impact on climate change mitigation, pollution and waste and transport (SA Objectives 1, 5 and 10).

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H.10 Minerals supply

H.10.1 Policy T30: Safeguarding mineral resources

Policy T30: Safeguarding mineral resources

Planning permission will only be granted for development that is incompatible with safeguarding mineral resources within the Mineral Safeguarding Areas, or development in a location which might hinder access to the mineral resources, where it is demonstrated that either:

a. the mineral is not of economic value or does not exist; or
b. that extraction of the mineral would not be viable or practicable; or
c. the mineral can be extracted satisfactorily, having regard to the need to demonstrate no unacceptable adverse impacts to the environment or communities and is for a temporary period, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development; or
d. the incompatible development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed; or
e. material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or
f. it constitutes development that is exempt from mineral safeguarding policy, namely: Householder applications; infill development of a minor nature in existing built-up areas; advertisement applications; reserved matters applications; minor extensions and changes of use of buildings; minor works; and non-material amendments to current planning permissions.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T30	0	0	0	0	0	++	+/-	0	0	0	0	+

H.10.1.1 Policy T30 seeks to protect mineral resources identified in Mineral Safeguarding Areas (MSAs) from development that would prevent the current or future extraction of the resource. This policy will be likely to have a major positive impact on the indictors identified in the natural resources objective (SA Objective 6).

H.10.1.2 The policy would serve to protect mineral resources and has the potential to have a minor positive impact on the economy through the protection of employment opportunities associated with the working and supply of minerals (SA Objective 12).

H.10.1.3 By safeguarding mineral resources and putting in place additional planning requirements for non-minerals development, the policy may have indirect negative impacts on the availability of land to meet predicted housing needs. However, the policy also allows for the overriding need for other development to be a material consideration in determining planning applications. This would allow the different levels of need for different land uses to be considered in any future planning applications. Therefore, the overall impact on the delivery of housing (SA Objective 7) is uncertain.

H.10.2 Policy T31: Safeguarding of existing mineral supply infrastructure

Policy T31: Safeguarding of existing mineral supply infrastructure

Identified mineral supply infrastructure will be safeguarded from development that would prejudice or prevent their operation. Such development will only be allowed in exceptional circumstances where it is demonstrated that;

a. The proposed site is already allocated for other uses in the Local Plan; or
b. material considerations indicates that the need for the proposed development override the presumption for safeguarding; and
c. either the facility is no longer required or alternative equivalent provision that compensates for the loss of facility can be made elsewhere in Medway.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T31	0	0	0	0	0	+	+/-	0	0	0	0	+

H.10.2.1 Policy T31 seeks to protect mineral supply infrastructure from development that would prevent the operation of the facility. By protecting the infrastructure required to support the extraction of minerals, this policy will be likely to have a minor positive impact on the indictors identified in the natural resources objective (SA Objective 6).

H.10.2.2 The policy would serve to protect the infrastructure required to support the minerals extraction and processing industry and has the potential to have a minor positive impact on the economy (SA Objective 12) through the protection of associated local employment opportunities.

H.10.2.3 By safeguarding sites where mineral supply infrastructure is located, the policy may have indirect negative impacts on the availability of land to meet identified housing needs and there is potential for a minor negative impact on housing provision. However, the policy also allows for the overriding need for other development to be a material consideration in determining planning applications. This would allow the different levels of need for different land uses to be considered in any future planning applications. The overall impact on the delivery of housing (SA Objective 7) is uncertain.

H.10.3 Policy T32: Supply of recycled and secondary aggregates

Policy T32: Supply of recycled and secondary aggregates

Proposals for additional capacity for secondary and recycled aggregate production, including those relating to the expansion of capacity at existing facilities, will be supported in the following locations:

a) Temporary demolition, construction, land reclamation and regeneration projects and highways developments where materials are either generated or to be used in the project or both for the duration of the project;
b) other mineral operations (including wharves and rail depots);
c) other waste management operations;
d) industrial estates.

Proposals for additional capacity for secondary and recycled aggregate production may be supported in other locations which are well located in relation to the source of input materials or demand for output materials and have good transport links.

Proposals to re-work old inert landfill sites and dredging disposal sites to produce recycled aggregate will be supported where it is demonstrated that net gains in landscape, biodiversity or amenity can be achieved by the operation and environmental impacts can be mitigated to an acceptable level.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T32	+	0	-	+	+	+	0	-	+/-	+	0	+

H.10.3.1 Policy T32 supports proposals for secondary and recycled aggregate processing "*which are well located in relation to the source of input materials or demand for output materials and have good transport links*". The policy would help to reduce the distances travelled by associated waste management vehicles such as HGVs by recycling and processing secondary aggregates in proximity to the source or destination. The policy could potentially lead to a reduction in traffic-related GHG emissions and a minor positive impact on climate change mitigation and transport (SA Objectives 1 and 10).

H.10.3.2 The policy supports the reworking of landfill sites to produce recycled aggregates "*where it is demonstrated that net gains in landscape, biodiversity or amenity can be achieved by the operation and environmental impacts can be mitigated to an acceptable level*". These types of proposals will be likely to have minor positive impacts on biodiversity and landscape and townscape (SA Objectives 3 and 4). However, the processing of secondary and recycled aggregates has the potential to create dust, noise and vibration, light pollution and an increase in traffic levels. There is the potential for Policy T32 to have a minor negative impact on biodiversity and health and wellbeing, depending on the nature of the operation and the location and sensitivity of the receptors (SA Objectives 3 and 8). There is uncertainty in this assessment as the locations of such proposals are not known. Following the precautionary principle, these impacts are identified as potentially minor negative for these two objectives.

H.10.3.3 The policy supports proposals for operations which process secondary and recycled aggregates in locations including, "*demolition, construction, land reclamation and regeneration projects and highways developments…other mineral operations (including wharves and rail depots), other waste management operations and industrial estates*". This type of development is likely to be similar in operational and visual terms to existing development on such sites and the policy has the potential to have minor positive effects on landscape and townscape (SA Objective 4) by co-locating similar forms of development.

H.10.3.4 This policy will help to support the principles of the waste hierarchy in terms of waste prevention and the reuse and recycling of materials and has the potential to have a minor positive impact on waste (SA Objective 5).

H.10.3.5 Policy T32 supports proposals for operations which would provide additional capacity to process secondary and recycled aggregates in certain, identified locations. This policy will be likely to support the re-use of materials and reduce the use of primary aggregates and has the potential to have a minor positive impact on the use of natural resources (SA Objective 6).

H.10.3.6 The development or expansion of secondary and recycled aggregate processing operations has the potential to have impacts on cultural heritage through changes to the setting or significance of the heritage asset. The policy is not locationally specific and the impact on cultural heritage at this stage is uncertain (SA Objective 9).

H.10.3.7 The policy has the potential to have a minor positive impact on the economy through the protection of employment opportunities associated with the processing of secondary and recycled aggregates (SA Objective 12).

H.10.4 Policy T33: Extraction of land won minerals

Policy T33: Extraction of land won materials

Sand and gravel

Proposals for the extraction of sand and gravel within the Sand and Gravel Areas of Search shown on the Policies Map, will be acceptable in principle, provided it can be demonstrated that there is a need for the mineral to make a contribution to meeting local and regional requirements, including to help meet forecasts of demand as identified in the Local Aggregates Assessment.

Proposals beyond the Sand and Gravel Areas of Search are not encouraged but may also be permitted depending on whether other sources are available and any constraints can be overcome.

Industrial minerals

Proposals for the extraction of chalk and brickearth will be permitted which demonstrate there is a need for the mineral to meet the demands of new or existing plant.

The need for chalk should be demonstrated to be contributing to a stock of chalk reserves of at least 15 years to support a cement works.

The need for brickearth should be demonstrated to be contributing to a stock of clay reserves to supply brick works.

Restoration and aftercare

Proposals will need to demonstrate how mineral excavations will be restored in a timely manner that results in ongoing benefits to the local community and environment.

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	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T33	+	0	-	-	-	++	0	-	+/-	+	0	+

H.10.4.1 By seeking to maintain local supplies of aggregates the policy would help to reduce the travel distances associated with the shipment of minerals, which may include rail, shipping, using the River Medway or River Thames, and HGVs. There is the potential for the policy to lead to a reduction in travel-related GHG emissions and a minor positive impact on climate change mitigation and transport (SA Objectives 1 and 10).

H.10.4.2 The extraction of minerals has the potential to create dust, noise and vibration, light pollution and an increase in traffic levels. Therefore, Policy T33 could potentially lead to a minor negative impact on biodiversity, landscape and townscape, pollution and health and wellbeing, depending on the nature of the operation and the location and sensitivity of the receptors. There is uncertainty in this assessment as the locations of proposals are not known. Furthermore, the policy seeks the restoration of minerals sites with "*ongoing benefits to the local community and environment".* Restored minerals sites have the potential to provide new habitats for biodiversity and recreational facilities for the local community, and mineral sites may reveal geology of interest. Overall, there is the potential for mixed minor positive and minor negative impacts on biodiversity and geodiversity, landscape and townscape, pollution and health and wellbeing (SA Objectives 3, 4, 5 and 8). Following the precautionary principle, these impacts are identified as having a potentially minor negative impact.

H.10.4.3 Policy T33 supports proposals for the extraction of sand and gravel within the identified Sand and Gravel Areas of Search. Proposals for the extraction of chalk and brickearth are also supported where the proposals can demonstrate that they meet identified needs. The policy seeks to secure the supply of these types of minerals, in line with national policy, and will be likely to have a major positive impact on the natural resources criteria (SA Objective 6).

H.10.4.4 The working of minerals has the potential to have impacts on cultural heritage through changes to the setting or significance of the heritage asset. The policy is not locationally specific and the impacts on cultural heritage at this stage are uncertain (SA Objective 9).

H.10.4.5 The policy has the potential to have a minor positive impact on the economy through the potential creation of employment opportunities associated with the extraction of minerals (SA Objective 12).

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H.11 Waste management

H.11.1 Policy DM23: Waste prevention

Policy DM23: Waste prevention

Proposals for development, including waste management facilities, must as a minimum demonstrate the following:

a) Construction and demolition methods will be used that minimise waste generation and facilitate the re-use/recycling of existing materials and structures, as far as practicable on site;

b) Design principles and construction methods that minimise the use of primary aggregates/virgin materials and encourage the use of fit for purpose building materials made from locally produced recycled and secondary resources; and

c) A design that facilitates the effective management of waste produced during its use in accordance with the waste hierarchy.

Qualifying development proposals must be supported by a Circular Economy Statement which includes details of the management of waste at all stages of development (construction, demolition and subsequent occupation).

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
DM23	+	0	0	0	++	+	0	0	0	0	0	0

H.11.1.1 Policy DM23 sets out the requirement for the sustainable management of waste and resources associated with new developments, during both construction and occupation.

H.11.1.2 The policy requires the demolition and construction processes for new developments to "*minimise waste generation and facilitate the re-use/recycling of existing materials and structures*" wherever possible. The policy also requires construction methods which minimise the use of "*primary aggregates / virgin materials"* and encourages the use of locally produced recycled and secondary sources. A Circular Economy Statement is required for all qualifying development (the criteria for which are set out in the supporting text); the circular economy approach seeks to eliminate construction waste through recycling/ reuse and eliminate the generation of hazardous waste. Existing buildings should be reused, where possible and practicable. The policy requires the design of development to allow for repair, refurbishment and reuse, and the design should also facilitate the likely storage requirements of reusable or recyclable materials produced during occupation of the buildings.

H.11.1.3 This policy will promote the principles of the waste hierarchy in terms of waste prevention and the reuse and recycling of materials. Overall, a major positive impact on waste is identified (SA Objective 5).

H.11.1.4 Additionally, through encouraging the efficient use of resources and reducing the need for extraction of primary aggregates, Policy DM23 is identified to result in a minor positive impact on natural resources (SA Objective 6).

H.11.1.5 The Climate Change Committee's 6th carbon budget states[24] that the waste sector, including energy-from-waste facilities, "*comprised 6% of UK GHG emissions in 2018… Landfill methane comprised the majority of waste sector emissions in 2018, followed by wastewater treatment and EfW plants*". By seeking to prevent waste generation and providing suitable designs to encourage waste separation and recycling within new developments, this policy will be likely to have a minor positive impact on climate change mitigation (SA Objective 1).

H.11.1.6 Policy DM23 encourages the reuse of materials and the management of waste on development sites either on-site or as close as possible to the source. These factors will be expected to minimise, as far as practical, the potential for and scale of adverse impacts on the environment by reducing the distances travelled by associated waste management vehicles such as HGVs. Therefore, negligible impacts have been identified for biodiversity and geodiversity, health and wellbeing and transport (SA Objectives 3, 8 and 10).

H.11.2 Policy T34: Safeguarding of existing waste management facilities

Policy T34: Safeguarding of existing waste management facilities

The following types of land and waste management facility are safeguarded from non-waste uses:

a. Sites in existing lawful waste use including wastewater and sewage treatment works (including those with temporary permission); and,
b. land with extant planning permission for waste use.

Proposals for non-waste development in proximity to safeguarded sites must demonstrate that they would not prejudice the operation of the site, including through incorporation of measures to mitigate and reduce their sensitivity to legitimate operation of the safeguarded site.

Proposals that would lead to loss of waste management capacity, prejudice site operation, or restrict future development of safeguarded sites will not be permitted unless it can be demonstrated that either:

a. The waste capacity and/or safeguarded site is not required to meet the objectives of the Plan; or
b. equivalent, suitable, and appropriate replacement capacity is provided in Medway in advance of the consented waste use ceasing or the non-waste permission being implemented; or
c. material considerations indicate that the need for the proposed development overrides the presumption for safeguarding and clause a) and/or clause b} above applies.

[24] The Climate Change Committee (2019) 'The Sixth Carbon Budget – Waste' Available at https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Waste.pdf [Date accessed: 03/03/25]

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T34	0	0	0	0	+	0	0	0	0	0	0	0

H.11.2.1 As set out in the accompanying text to Policy T34, the Medway Local Plan area has a range of waste management facilities which handle a variety of waste streams.

H.11.2.2 Policy T34 seeks to safeguard the capacity of the existing waste management facilities in the Plan area; this will help to ensure waste management operations can be undertaken locally, where possible, and maintain waste management capacity.

H.11.2.3 The policy also states that, "*Proposals for non-waste development in proximity to safeguarded sites must demonstrate that they would not prejudice the operation of the site*". The policy will be likely to help ensure appropriate waste management facilities are protected in the Plan area and that capacity at these facilities meets the identified waste needs where possible.

H.11.2.4 Overall, a minor positive impact on waste is identified (SA Objective 5).

H.11.3 Policy T35: Provision of additional waste management capacity

Policy T35: Provision of additional waste management capacity

Proposals for the development of additional waste management capacity (as well as improvement or extension of existing facilities) will be supported where it is demonstrated that the development will contribute towards achieving:

a) Targets specified in this Plan for recycling, 'other recovery' and the diversion of the waste away from disposal in a manner that does not prevent management of the waste at the highest point practical in the waste hierarchy; and,

b) Net self sufficiency of the Plan area in waste management capacity.

Proposals for 'other recovery' facilities will only be supported where a need for the capacity has been identified such that additional capacity would not cause waste to be diverted from management methods further up the waste hierarchy.

Proposals for the improvement or extension (physical or temporal) of existing waste management facilities will be supported where the quantity of waste to be managed is at least equal to the quantity of waste currently managed on site.

Proposals for the improvement or extension (physical or temporal) of facilities with temporary planning permission should include consideration of the original reason(s) for the permission being time limited and not result in development (or extensions in time) that would undermine these reasons unless circumstances have changed in the intervening period.

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	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T35	+/-	-	-	-	++	-	0	-	-	-	0	0

H.11.3.1 Policy T35 sets out how applications for new waste management facilities will be considered by the Council. The management of waste in accordance with the waste hierarchy is a legal requirement and also a key element of the National Planning Policy for Waste[25]. The supporting text to Policy T35 sets out the predicted quantities of waste that may be generated over the Plan period and how these sources of waste are likely to be managed. The main types of waste are:

- Local Authority Collected Waste (mainly household waste) (LACW);
- Commercial and Industrial Waste (waste from businesses) (C&I waste);
- Construction, Demolition and Excavation Waste (CDEW);
- Hazardous Waste; and
- Wastewater and Sewage Sludge.

H.11.3.2 Policy T35 supports proposals for additional waste management capacity, provided such proposals meet the criteria identified, including the need to meet the identified targets for recycling and 'other recovery', and avoidance of 'disposal'. The targets for each type of waste are set out in the supporting text to the policy and seek to meet government targets, including for 65% recycling of LACW by 2035.

H.11.3.3 Overall, Policy T35 is anticipated to help to meet the predicted waste needs and recycling targets over the Plan period and therefore a major positive impact on waste (SA Objective 5) is anticipated.

H.11.3.4 While the policy seeks to manage waste at the highest point in the waste hierarchy and therefore seeks to reduce waste generation, there is likely to be an increase in vehicle movements associated with waste management operations to accommodate the predicted increases in the different types of recyclable and other household and commercial and industrial waste over the Plan period. There is potential for adverse impacts on vehicle-related air pollution and therefore some mixed positive and negative effects on SA Objective 5 (pollution and waste). However, given the overall strategy seeks to manage waste at the highest point in the waste hierarchy and plans to meet waste needs, the overall effect on this objective is likely to be major positive.

[25] DLUHC and MHCLG (2014) National planning policy for waste. Available at: https://www.gov.uk/government/publications/national-planning-policy-for-waste [Date accessed: 03/03/25]

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H.11.3.5 By seeking to manage waste at the highest point in the waste hierarchy, and reducing waste disposed to landfill, Policy T35 is likely to reduce associated GHG emissions, with benefits for climate change mitigation. However, there is also likely to be an increase in vehicle trips associated with waste management operations to accommodate the predicted increases in the different types of recyclable and other household and commercial and industrial waste over the Plan period, with potential adverse effects on vehicle-related air pollution. Therefore, some mixed positive and negative effects are likely on climate change mitigation, with an uncertain impact recorded overall (SA Objective 1).

H.11.3.6 The locations of any proposals for the provision of additional waste management capacity or facilities are unknown at this stage and may include development in greenfield locations or on previously developed land. Waste management facilities may include a range of different forms of development and therefore there is the potential for such development to have a range of impacts on different types of receptors and SA Objectives. Following the precautionary principle, there is the potential for minor negative impacts on climate change adaptation, biodiversity and geodiversity, landscape, natural resources, health and wellbeing, cultural heritage and transport (SA Objectives 2, 3, 4, 6, 8, 9 and 10).

H.11.4 Policy T36: Location of waste management facilities

Policy T36: Location of waste management facilities

Proposals for additional waste management capacity (excluding permanent deposit) will be supported in the following locations:

- Established industrial estates;
- Land identified for employment uses or industrial and storage purposes in this Plan;
- Land considered to be previously developed and/or redundant agricultural buildings and their curtilages.
- Land that is otherwise suitable for waste development when assessed against other policies in the Plan including the following considerations:
  - There is no unacceptable adverse impact on sites designated for environmental or heritage significance;
  - The site is not allocated for other non-employment uses in the Local Plan;
  - The site is located in an area that can accommodate the proposed development and does not have an unacceptable impact on amenity, the local environment and transport networks;
  - Proposals on 'greenfield' land will only be permitted where no alternative suitable previously developed land can be identified.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T36	0	0	0	0	+	+/-	0	0	0	0	0	0

H.11.4.1 Policy T36 supports the development of future waste management facilities, subject to the locational criteria identified. This will be likely to have a minor positive impact on the management of waste (SA Objective 5).

H.11.4.2 Policy T36 seeks to direct waste management facilities to existing employment sites and other previously developed locations; this encourages an efficient use of land and will be likely to have a positive impact on natural resources in this respect. However, the policy also allows for development in greenfield locations "*where no alternative suitable previously developed land can be identified*". The policy does not exclude the potential for development in greenfield locations and as such an uncertain impact on natural resources is identified (SA Objective 6).

H.11.4.3 The policy supports proposals for additional waste management capacity on existing waste sites and sites with established industrial or other employment uses. By supporting proposals that co-locate proposed waste sites with existing forms of similar development, the policy would be anticipated to lessen the likelihood of significant adverse impacts on the landscape and cultural heritage. The policy also states that any future waste development would need to ensure "*no unacceptable adverse impact on sites designated for environmental or heritage significance*" or on amenity and transport networks. This would be anticipated to lessen the likelihood of significant adverse effects on biodiversity and geodiversity, designated landscapes and heritage features, noise and air pollution and transport networks (SA Objectives 3, 4, 8, 9 and 10).

H.11.5 Policy T37: Other recovery

Policy T37: Other recovery

Proposals for development which allow for forms of waste recovery other than reuse, repair and recycling, (e.g. where waste is used as a fuel and/or fuel is produced from waste) will be supported where the waste being managed cannot be practicably repaired, reused or recycled i.e. it is unavoidable residual waste.

Energy from Waste (EfW) facilities

In addition to the above, energy from waste facilities will be supported where it can be demonstrated that:

a) the maximum amount of energy from the process will be utilised including the use of surplus heat;

b) residues arising from the process will be converted into a material with a proven end use; and,

c) the facility is designed to enable gaseous non biogenic emissions of carbon to be captured, utilised and, failing that, stored.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T37	+	+/-	+/-	+/-	+	+/-	0	+/-	+/-	+/-	0	0

H.11.5.1 Policy T37 supports proposals for Energy from Waste (EfW) facilities provided that the waste cannot be managed at a higher point in the waste hierarchy and that the "*maximum amount of energy from the process will be utilised*". As set out in the accompanying text to the policy, EfW facilities must achieve a minimum level of energy efficiency to be preferred over disposal to landfill. Such facilities will also need to be carbon capture and storage enabled. These measures are likely to result in a minor positive impact on climate change mitigation (SA Objective 1).

H.11.5.2 The policy seeks to set criteria for proposals for waste management facilities under the 'other recovery' category in the waste hierarchy and will help to ensure that waste management needs can be met for the different types of waste generated in Medway Plan area. The policy is likely to have a minor positive impact on waste management (SA Objective 5).

H.11.5.3 The nature and location of any future applications for waste facilities is unknown at this stage. Uncertain impacts are recorded for SA Objectives 2, 3, 4, 6, 8, 9 and 10. Potential effects of EfW facilities or other developments for waste recovery would need to be evaluated on a case-by-case basis.

H.11.6 Policy T38: Non-inert landfill

Policy T38: Non-inert landfill

Proposals for the creation of void space or land-raising for a disposal facility for non-inert waste will be supported where the following is demonstrated:

a) that the waste to be deposited cannot be reasonably managed in any other way (that is that the waste comprises irreducible residues or materials that it is not possible to manage higher up the waste hierarchy);

b) a clear programme and time limit for the operation which will ensure the timely completion and restoration of the site to a beneficial afteruse;

c) measures are included to ensure

i. maximum practicable recovery of energy from any landfill gas generated; and,

ii. satisfactory provision for the restoration and after-use of the site.

Proposals for the reworking of old landfill sites will be supported where the criteria above have been demonstrated, and that:

a) during its operation, it is demonstrated that the site did not receive any hazardous waste for disposal; and,

b) any extracted materials, are to be managed as far up the waste hierarchy as practicable.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural Resources	Housing	Health and wellbeing	Cultural heritage	Transport and access	Education	Economy
T38	+/-	+/-	+/-	0	+	+/-	0	+/-	+/-	+/-	0	0

H.11.6.1 Other waste policies proposed in the Plan seek to manage waste at the highest point in the waste hierarchy and disposal to landfill is predicted to form a declining proportion of waste management needs. Policy T38 sets criteria for determining applications for non-inert waste, should there be a need for new landfill sites to come forward.

H.11.6.2 The policy seeks to ensure that "*measures are included to ensure maximum practicable recovery of energy from any landfill gas generated'.* This would help to mitigate emissions of methane, a GHG. As the location and detailed nature of any proposals is not set out in the policy, there would be uncertain effects in relation to changes in transport and associated GHG emissions. There is the potential to reduce the distances waste needs to be transported if landfill sites were to be located within the Plan area in comparison to using existing sites outside the Plan area. The net change in GHG emissions, and as such the overall impact on climate change mitigation (SA Objective 1), is uncertain.

H.11.6.3 The policy sets criteria to determine applications for landfill waste sites. There is the potential for landfill sites to generate leachates, if not properly managed; however, there is uncertainty about the potential for any such impact at this stage. Furthermore, any future sites would need to meet the standards required for an environmental permit from the Environment Agency, reducing the likelihood of such pollution impacts. There are, therefore, the potential for mixed positive and negative impacts on SA Objective 5. As the policy seeks to set criteria to guide applications for landfill disposal sites, there is likely to be a minor positive impact on the management of waste, and on the pollution and waste objective overall (SA Objective 5).

H.11.6.4 The policy states that proposals will need "*a clear programme and time limit for the operation which will ensure the timely completion and restoration of the site to a beneficial afteruse*" and "*satisfactory provision for the restoration and after-use of the site*". These criteria will help to mitigate long term negative effects on the landscape and visual amenity and a negligible impact on SA Objective 4 would be anticipated.

H.11.6.5 As the policy sets criteria for determining planning applications and is not location specific, the potential effects on climate change adaptation, biodiversity and geodiversity, BMV land and other natural resources, health and wellbeing, cultural heritage, transport and the economy are uncertain (SA Objectives 2, 3, 6, 8, 9 and 10).

H.11.7 Policy T39: Beneficial use of inert waste by permanent deposit

Policy T39: Beneficial use of inert waste by permanent deposit
Proposals for the deposit of inert waste on land will be permitted, subject to other policies of this Plan, where it is demonstrated that the waste is inert and the proposal: a) Is an engineering operation such as that which forms part of a comprehensive permitted scheme for restoration of previously developed land or minerals sites; or b) Significantly enhances other development or its setting; or c) Would result in measurable improvement to the use or operation of agricultural and/or forestry land; and d) The resulting final landform, landscape and afteruse enhances the environment and is sympathetic to the land uses, landscape, visual amenity and nature conservation interests of the site and the surrounding area including its landscape character; and e) The minimum volume of inert material is used to achieve necessary improvements; and

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Policy T39: Beneficial use of inert waste by permanent deposit
f) Where appropriate, the proposal includes ancillary on-site facilities for the recovery of the waste which can be managed by methods further up the waste hierarchy.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and access	Education	Economy
T39	+/-	0	0	+	+	+	0	0	+	+/-	0	0

H.11.7.1 The text accompanying Policy T39 states that inert excavation waste can be beneficially recovered for use in a permanent deposit, for example in engineering or restoration works. Such operations may require planning permission and Policy T39 sets out the criteria to determine such applications.

H.11.7.2 The policy seeks to positively plan for the appropriate use of inert waste and would therefore have a minor positive impact on the waste objective (SA Objective 5).

H.11.7.3 The policy seeks to ensure that any such proposal "*significantly enhances other development or its setting*" and "*the resulting final landform, landscape and afteruse enhances the environment*". These criteria have the potential to ensure the proposal has a long term minor positive impact on landscape and townscape as well as built heritage features (SA Objectives 4 and 9).

H.11.7.4 Furthermore, the requirement to ensure after-uses are "*sympathetic to the land uses, landscape, visual amenity and nature conservation interests of the site"* the policy could help to reduce the potential for adverse effects on biodiversity (SA Objective 3).

H.11.7.5 Policy T39 supports proposals that "*result in measurable improvement to the use or operation of agricultural and/or forestry land*" and therefore there is the potential for a minor positive impact on natural resources (SA Objective 6).

H.11.7.6 Inert waste is non-hazardous and unlikely to cause significant harm to human health or the environment, however, it can include heavy materials such as concrete and rubble, which may require operation of HGVs and other machinery. There is a possibility of increased HGV traffic and associated GHG emissions due to the movement of inert waste, should any such facilities come forward in Medway. The impact of Policy T39 on climate change mitigation (SA Objective 1) and transport (SA Objective 10) is uncertain.

H.11.7.7 **Recommendation:** It is suggested that wording to ensure development is 'sympathetic to' surrounding land uses and environmental receptors in Policy T39 could be strengthened by instead using words such as 'conserve', 'enhance', 'net gain in biodiversity' or other wording to provide greater clarity.

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H.11.8 Policy T40: Wastewater treatment

Policy T40: Wastewater treatment

Proposals for new or extended facilities for the management, treatment and disposal of wastewater and sewage sludge will be supported where the development is:

a) required to meet current or prospective environmental standards or regulatory provisions; and/or

b) required to improve the operational efficiency of wastewater and sewage sludge management.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and access	Education	Economy
T40	0	0	0	0	+	0	0	0	0	0	0	0

H.11.8.1 Medway Council works with Southern Water and the Environment Agency to ensure that the management of wastewater arising from the Plan area is acceptable.

H.11.8.2 Proposals for new wastewater treatment facilities and extensions to existing facilities require planning permission and Policy T40 sets out the criteria against which such applications will be determined. The siting of wastewater treatment facilities may be constrained by operational requirements.

H.11.8.3 Policy T40 will assist in ensuring appropriate wastewater management capacity is available to service the Plan area, and as such, a minor positive impact on the pollution and waste objective is anticipated (SA Objectives 5).

H.11.8.4 By ensuring that there is sufficient capacity in the waste water infrastructure network in order to meet *"current or prospective environmental standards or regulatory provisions"*, this could help to reduce the potential for negative effects on human health and water quality, especially in light of climate change and the location of Medway in an area of water stress. An overall negligible impact is recorded for climate change adaptation, natural resources and health (SA Objectives 2, 6 and 8).

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H.12 Energy

H.12.1 Policy S25: Energy supply

Policy S25: Energy supply

Kingsnorth and the Isle of Grain are suitable locations for renewable and low carbon energy development. Proposals for such developments will be supported if the potential adverse impacts are or can be made acceptable, including cumulative landscape and visual impacts.

For proposals in other locations, the latest Landscape Character Assessment will inform an assessment of cumulative landscape and visual impacts.

Energy developments over 50 megawatts capacity are considered by the Secretary of State for Energy under the Planning Act 2008, and the local planning authority is a statutory consultee.

Low carbon hydrogen production will meet the relevant safety regulations and a national emissions standard.

Proposals will have regard to the latest regional, sub-regional and local strategies for economic development and skills, such as the Skills and Employability Plan for Medway or equivalent.

Community-led initiatives for renewable and low carbon energy through neighbourhood planning will be supported.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
S25	++	--	--	-	+/-	-	0	+/-	-	-	+	++

H.12.1.1 Policy S25 supports the development proposals for renewable and low carbon energy supply within the areas of Kingsnorth and the Isle of Grain, providing any adverse impacts "*are or can be made acceptable*". The policy additionally seeks to support community-led initiatives "*for renewable and low carbon energy through neighbourhood planning*", which may encourage communities to collectively reduce their GHG emissions through local initiatives. Through setting out support for energy schemes which would potentially increase the supply of low carbon energy regionally and nationally, as well as supporting local initiatives, the policy could have a major positive impact on mitigating the effects of climate change (SA Objective 1).

H.12.1.2 The policy seeks to support energy development which could result in employment opportunities for local residents. The policy states "*Proposals will have regard to the latest regional, sub-regional and local strategies for economic development and skills, such as the Skills and Employability Plan for Medway or equivalent*". Additionally, the generation and exportation of energy will be likely to promote economic benefits, and therefore a major positive impact on the economy could be achieved (SA Objective 12). By supporting the development of renewable and low-carbon energy projects, there is the potential to enhance related skills in the local workforce resulting in a minor positive impact on education (SA Objective 11).

H.12.1.3 The areas proposed as suitable areas for energy infrastructure development within Policy S25, namely Kingsnorth and the Isle of Grain, are associated with high-risk flood zones, in addition to being in close proximity to flood defences. There is the potential for a major negative impact on climate change adaptation (SA Objective 2). The mitigation of flood risk and the potential for sea level rise are matters that will be required to be considered in any future projects in this area.

H.12.1.4 Policy S25 supports development of energy infrastructure in areas which possess highly sensitive, internationally and nationally important biodiversity features, such as the Medway Estuary SPA and Ramsar site. Although the policy seeks to ensure that any environmental impacts are "*made acceptable*" through mitigation, a major negative impact on biodiversity in the area cannot be ruled out at this stage (SA Objective 3). Additionally, the unknown nature of any community-based initiatives, and larger projects, for renewable and low carbon energy, supported in-principle by the policy, leads to uncertainty with potential negative impacts on these important biodiversity sites. A project-level HRA is likely to be required for any future planning applications for energy schemes.

H.12.1.5 The policy seeks to ensure that development proposals minimise impacts on the local landscape through assessments informed by the latest Landscape Character Assessment. While the landscape of the Isle of Grain and Kingsnorth are characterised by existing industrial development, including that relating to energy generation, there is the potential for minor negative impacts on landscape character and visual amenity (SA Objective 4) particularly in relation to views from local PRoW present in these areas and the potential for further urbanising influences on the character of the surrounding landscape, depending on the nature and location of future proposals.

H.12.1.6 Additionally, there is the potential for negative impacts on cultural heritage features in these identified areas, such as the Grade I Listed Church of St James in the Isle of Grain area and various Grade II Listed Buildings in Kingsnorth (SA Objective 9). Furthermore, the unknown nature of any community-based initiatives, or larger projects, for renewable and low carbon energy supported in-principle by the policy leads to uncertainty with potential negative impacts on landscape and cultural heritage receptors.

H.12.1.7 Policy S25 seeks to support development for energy projects which are currently identified to be within areas already existing in close proximity to necessary infrastructure, comprised largely of brownfield sites, such as at the Kingsnorth Power Station and Isle of Grain locations. However, some areas within the proposed sites coincide with Grade 3 agricultural land and/or Mineral Safeguarding Areas and therefore there is potential for a minor negative impact on natural resources (SA Objective 6). Furthermore, the unknown nature of any community-based initiatives, or larger projects, for renewable and low carbon energy, supported in-principle by the policy, leads to uncertainty in the assessment and the potential for negative impacts on natural resources.

H.12.1.8 Kingsnorth and Isle of Grain are located in an area which lacks sustainable transport choices, such as regular bus services and local railway stations. There is the potential for minor negative impacts on transport and accessibility (SA Objective 10) due to additional private vehicle use during the construction and operational phases of the development.

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H.12.1.9 Uncertain impacts on local pollution and waste (SA Objective 5) and health and wellbeing (SA Objective 8) have been identified. Additional traffic generated from construction and operation could increase traffic-related pollutants, resulting in potential impacts on local residents' health. The details of the proposals in relation to transport impacts, transport choices and air quality are uncertain at this stage.

H.12.2 Policy T41: Heat networks

Policy T41: Heat networks

Development proposals of 10 dwellings or more (including conversions) or 1,000 sqm or more will follow the heat network provision hierarchy, unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable:

a) Connect to an existing heat network.
b) Construct a heat network served by a low carbon heat source.
c) Collaborate with neighbouring development sites and/or existing heat sources to develop a shared heat network.
d) Where heat networks are unviable, but there is potential for future heat networks, demonstrate how the design would allow for a connection to a future heat network. In this instance, alternative forms of domestic heating that comply with the relevant Building Regulations will be permitted.

Development proposals will have regard to further feasibility studies and the role of 'anchor loads', such as the Civic Centre and Strood Waterfront sites in Strood and other sites on the Hoo Peninsula.

	1	2	3	4	5	6	7	8	9	10	11	12
Policy Ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
T41	+	0	0	0	0	0	0	+	0	0	0	0

H.12.2.1 Policy T41 seeks to support opportunities for development proposals to obtain their energy supplies from decentralised low-carbon energy supply systems, as set out within the NPPF. The policy proposes a heat network provision hierarchy. By requiring new developments to comply with local requirements to connect to, or be able to connect to, a decentralised energy supply, the policy would likely have a minor positive impact in relation to climate change mitigation (SA Objective 1). Medway Council's initial studies indicate that sites in Strood and on the Hoo Peninsula have greatest opportunities for such systems.

H.12.2.2 Additionally, through improved energy efficiency within the Plan area in regard to heat networks, Policy T41 will be likely to reduce energy bills and reduce the likelihood of fuel poverty for some residents. The policy as the potential to have a minor positive impact on the health and wellbeing of communities (SA Objective 8).

Appendix I: Reasonable Alternative Site Assessments (Post-Mitigation)

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I.1 Introduction

I.1.1 Preface

I.1.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through emerging Medway Local Plan (MLP) policies.

I.1.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as Local Plan policy. The purpose of this stage is to identify the impacts that will need to be overcome for development to optimise sustainability performance.

I.1.1.3 The post-mitigation assessment considers how mitigating factors, including Local Plan policy and other guidance, will help to avoid or reduce the impacts that were identified at the pre-mitigation stage.

I.1.1.4 It is important to demonstrate the amount of mitigation that may be required to ensure a site can optimise sustainability performance. The level of intervention that may be required to facilitate effective mitigation varies and can help determine the eventual choice of preferred option in the plan. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.

I.1.1.5 **Chapter I.2** summarises out the pre-mitigation impacts of all reasonable alternative sites considered throughout the SA process alongside the MLP preparation (see **Appendix F** and **G** for the full pre-mitigation strategic and non-strategic site assessments set out per receptor within each SA Objective).

I.1.1.6 **Chapter I.3** provides detail on the mitigation within the MLP policies, and discusses the post-mitigation impacts for all reasonable alternative sites against each SA Objective.

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I.2 Pre-mitigation assessment

I.2.1 Introduction

I.2.1.1 A total of 335 non-strategic reasonable alternative sites have been identified, described and evaluated as part of this Regulation 19 SA, as follows:

- 200 sites identified for residential use;
- 47 sites identified for non-residential use;
- 87 sites identified for mixed uses; and
- One site identified for either residential or non-residential use.

I.2.1.2 All 335 reasonable alternative sites have been evaluated pre-mitigation, and presented in full within **Appendix G**, with impacts discussed by receptor within each SA Objective.

I.2.1.3 Additionally, 27 reasonable alternative strategic sites have been identified, described and evaluated, comprising either employment-led sites over 75ha or residential-led sites over 10ha and which could deliver at least 500 new homes (or at least 300 homes for sites in Allhallows, Lower Stoke and Middle Stoke). The pre-mitigation assessment of the 27 strategic sites can be found in **Appendix F**, which also took into account accompanying infrastructure and proposals from masterplans and other information supplied by the Council, recognising that this will be necessary for the delivery of such large-scale growth.

I.2.1.4 **Table I.2.1** presents the pre-mitigation impact matrix for all 27 strategic sites, and **Table I.2.2** for the 335 non-strategic sites, considered throughout the preparation of the MLP, summarising the impacts per SA Objective, and supersedes the comparable tables (Table 6.3 and 6.4) presented in the Regulation 18 Interim SA Report (2024)[1].

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[1] Lepus Consulting (2024) Sustainability Appraisal of the Medway Local Plan. Regulation 18: Interim SA Report, June 2024. Available at: https://medway.oc2.uk/docfiles/20/Interim%20Sustainability%20Appraisal%20-%20Volume%201%20of%202.pdf [Date accessed: 11/03/25]

Table I.2.1: *Impact matrix of all strategic reasonable alternative sites pre-mitigation*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref	**Site use**	Climate Change Mitigation	Climate Change Adaptation	Biodiversity	Landscape	Pollution and Waste	Natural Resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
AS13	Residential led (Mixed-use)	+/-	--	--	-	--	--	++	-	-	-	-	+
AS21	Residential led (Mixed-use)	+/-	--	-	-	--	--	++	-	-	-	-	++
AS22	Residential led (Mixed-use)	+/-	--	--	-	--	--	++	-	-	-	-	++
AS24	Non-residential	+/-	--	--	-	--	-	0	-	-	-	0	+/-
AS26	Non-residential	+/-	--	--	-	--	-	0	-	-	-	0	+/-
CHR4	Residential led (Mixed-use)	+/-	-	-	-	--	--	++	-	-	++	++	++
HHH12	Residential led (Mixed-use)	+/-	--	--	--	--	--	++	-	-	-	+	++
HHH22	Residential led (Mixed-use)	+/-	--	-	-	--	--	++	-	-	-	++	++
HHH22/ HHH31	Residential led (Mixed-use)	+/-	--	-	-	--	--	++	-	-	-	++	++
HHH26	Residential led (Mixed-use)	+/-	+	-	-	--	--	++	-	-	-	-	++
HHH3	Residential led	+/-	+	--	-	--	--	++	-	0	-	-	++
HHH31	Residential led (Mixed-use)	+/-	--	-	-	--	--	++	-	-	-	-	++
HHH35	Non-residential	+/-	--	-	-	--	--	0	-	-	-	0	++
HHH36	Non-residential	+/-	--	--	-	--	-	0	-	-	-	0	+/-
HHH6	Residential led (Mixed-use)	+/-	--	-	-	--	--	++	-	0	-	+	++
HW1	Residential led	+/-	-	-	-	--	-	++	-	-	-	-	++
LW6	Residential led	+/-	+	-	-	--	--	++	-	0	-	+	+
LW8	Residential led	+/-	+	-	-	--	--	++	-	0	-	-	++
RN8	Residential led (Mixed-use)	+/-	+	--	-	--	-	++	-	-	-	-	++
RN9	Residential led (Mixed-use)	+/-	--	--	-	--	--	++	+	-	++	++	++
RSE10	Residential led (Mixed-use)	+/-	+	-	-	--	--	++	-	-	++	+	++
SMI5	Non-residential	+/-	--	--	-	--	+	0	+	0	++	0	+/-
SMI6	Residential led (Mixed-use)	+/-	--	--	-	--	+	++	+	0	++	-	+/-
SNF3	Residential led	+/-	-	-	-	--	--	++	-	0	-	0	++
SR17	Residential led (Mixed-use)	+/-	-	-	-	--	--	++	-	-	-	+	++
SR9	Residential led (Mixed-use)	+/-	+	-	-	--	--	++	-	0	-	-	++
SR53	Residential led (Mixed-use opportunity area)	+/-	-	-	+/-	--	-	++	-	-	-	-	+/-

Table I.2.2: *Impact matrix of all non-strategic reasonable alternative sites pre-mitigation*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
AS1	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
AS10	Residential led	+/-	+	-	-	-	-	+	-	-	-	-	+
AS11	Residential led (Mixed-use)	+/-	+	-	-	-	-	+	-	-	-	-	+/-
AS14	Residential led	+/-	-	-	-	-	-	+	-	-	-	-	+
AS15	Residential led	+/-	--	--	-	-	-	+	-	0	-	-	+
AS16	Residential led (Mixed-use)	+/-	-	-	+/-	-	-	+	-	--	-	-	+/-
AS17	Residential led	+/-	--	--	-	--	-	++	-	-	-	-	+
AS18	Residential led	+/-	-	-	-	-	-	+	-	-	-	-	+
AS2	Residential led	+/-	-	-	-	-	-	+	-	-	-	-	+
AS20	Residential led (Mixed-use)	+/-	--	-	-	--	--	++	-	-	-	-	+/-
AS23	Residential led (park homes)	+/-	-	--	-	+/-	-	+	-	0	-	0	+
AS25	Residential led	+/-	+	-	-	-	-	+	-	0	-	-	+
AS28	Residential led	+/-	--	--	-	-	-	+	-	-	-	-	+
AS29	Residential led	+/-	-	-	-	+/-	-	+	-	0	-	-	+
AS3	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
AS5	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	-	+/-
AS6	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	-	+/-
AS7	Non-residential	+/-	+	-	-	-	+	0	-	0	-	0	+/-
AS8	Non-residential	+/-	-	-	-	--	-	0	-	0	-	0	+/-
AS9	Non-residential	+/-	--	-	-	--	--	0	-	0	-	0	++
CCB1	Residential led	+/-	-	-	+/-	-	+	+	-	-	++	+	+
CCB10	Residential led (Mixed-use)	+/-	-	-	-	-	+	+	-	-	++	+	+/-
CCB11	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	-
CCB12	Residential led (Mixed-use)	+/-	+	-	+/-	-	-	+	-	0	++	+	+/-
CCB13	Residential led (Mixed-use)	+/-	--	-	+/-	--	+	++	+	--	++	+	+/-
CCB15	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
CCB16	Residential led	+/-	-	-	+/-	-	-	+	+	-	++	+	-
CCB17	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	-	++	+	+/-
CCB18	Residential led	+/-	+	-	+/-	--	-	++	+	-	++	+	+
CCB19	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
CCB2	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	-	0	++	+	+/-
CCB20	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	+	+	0	++	+	+/-
CCB21	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	+	+	-	++	+	+/-
CCB22	Residential led	+/-	-	-	+/-	-	+	+	+	-	-	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
CCB23	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-
CCB24	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-
CCB25	Residential led	+/-	--	-	-	--	+	++	-	--	++	-	+
CCB26	Residential led (Mixed-use)	+/-	--	-	-	-	+	+	+	0	++	+	+/-
CCB27	Residential led (Mixed-use)	+/-	--	-	-	-	+	+	+	0	++	+	+/-
CCB28	Residential led	+/-	+	-	+/-	-	+	+	-	0	++	+	-
CCB29	Residential led	+/-	+	-	-	-	-	+	-	-	++	+	+
CCB3	Residential led (Mixed-use)	+/-	+	-	-	-	+	+	-	0	++	+	+/-
CCB30	Residential led (Mixed-use)	+/-	+	-	+/-	-	-	+	+	0	++	+	+/-
CCB31	Residential led	+/-	-	-	+/-	--	-	++	+	-	++	+	+
CCB33	Residential led	+/-	+	-	+/-	-	+	+	+	-	++	+	+
CCB34	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-
CCB35	Non-residential	+/-	--	-	-	--	-	0	+	--	++	0	++
CCB36	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	+	+	0	++	+	+/-
CCB37	Residential led (Mixed-use)	+/-	-	-	+/-	--	+	++	+	-	++	+	+/-
CCB38	Residential led	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-
CCB39	Residential led	+/-	-	-	+/-	-	-	+	+	0	++	+	+
CCB4	Residential led	+/-	+	-	+/-	-	+	+	-	-	++	+	+
CCB40	Residential led	+/-	+	-	-	-	-	+	-	-	++	+	+
CCB41	Residential led	+/-	-	-	+/-	-	-	+	-	0	++	+	+
CCB43	Residential led	+/-	--	-	+/-	-	-	+	-	-	++	-	-
CCB44	Residential led	+/-	+	-	-	-	+	+	+	0	++	+	+
CCB46	Residential led	+/-	+	-	-	-	+	+	+	0	++	+	+
CCB48	Residential led	+/-	+	-	-	-	-	+	+	-	++	+	+
CCB49	Residential led	+/-	-	-	+/-	--	+	++	-	-	++	+	-
CCB5	Non-residential	+/-	--	-	-	--	-	0	-	--	++	0	+/-
CCB6	Residential led (Mixed-use)	+/-	-	-	-	-	+	+	-	0	++	+	+/-
CCB7	Residential led (Mixed-use)	+/-	--	-	+/-	-	-	+	+	-	++	+	+/-
CCB8	Residential led	+/-	--	-	+/-	--	+	++	+	0	++	+	-
CCB9	Residential led	+/-	+	-	+/-	-	+	+	-	-	++	+	-
CHR1	Residential led	+/-	+	-	--	-	+	+	-	0	-	-	-
CHR10	Residential led	+/-	+	-	--	-	-	+	-	0	++	-	+
CHR11	Residential led	+/-	+	-	-	-	+	+	-	0	+	-	-
CHR13	Residential led (Gypsy and Traveller)	+/-	--	-	-	-	-	+	-	0	-	-	+
CHR14	Residential led (Mixed-use)	+/-	--	-	-	-	-	+	-	-	-	-	+/-
CHR15	Non-residential	+/-	--	-	-	-	+	0	-	0	-	0	++

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
CHR16	Non-residential	+/-	-	-	-	--	-	0	-	0	-	0	+/-
CHR17	Non-residential	+/-	+	-	-	--	-	0	-	0	-	0	++
CHR18	Non-residential	+/-	+	-	-	--	+	0	-	0	+	0	+/-
CHR19	Non-residential	+/-	--	-	+/-	--	+	0	+	0	++	0	+/-
CHR2	Non-residential	+/-	+	--	--	--	-	0	-	0	-	0	++
CHR20	Residential led	+/-	--	-	-	--	-	++	-	-	-	-	--
CHR21	Non-residential	+/-	--	-	+/-	--	+	0	+	-	++	0	+/-
CHR3	Non-residential	+/-	--	--	--	--	-	0	-	-	-	0	++
CHR5	Non-residential	+/-	+	-	-	-	-	0	-	0	++	0	++
CHR6	Residential led	+/-	--	-	-	-	+	+	-	0	-	-	+
CHR7	Residential led	+/-	+	-	--	--	-	++	-	0	-	-	+
CHR8	Non-residential	+/-	-	-	-	-	-	0	-	0	-	0	+/-
FH1	Non-residential	+/-	+	-	-	--	+	0	-	0	-	0	++
FP1	Residential led	+/-	-	-	+/-	-	+	++	-	-	++	+	-
FP10	Residential led	+/-	--	-	-	--	-	++	-	-	++	+	-
FP11	Residential led (Mixed-use)	+/-	--	-	+/-	--	+	++	-	-	++	+	+/-
FP12	Residential led	+/-	+	-	+/-	-	+	+	-	-	++	+	-
FP14	Residential led	+/-	+	-	+/-	-	+	+	-	-	++	+	-
FP16	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	-	-	++	+	+/-
FP17	Residential led	+/-	+	-	+/-	-	+	+	-	0	++	+	+
FP18	Residential led	+/-	--	-	-	-	+	+	-	-	++	+	-
FP19	Residential led	+/-	--	-	+/-	--	+	++	-	-	++	+	-
FP2	Residential led	+/-	--	-	+/-	-	+	+	-	--	++	+	+
FP22	Residential led	+/-	+	-	+/-	-	-	+	-	-	++	+	-
FP23	Residential led	+/-	--	-	+/-	-	+	+	+	0	++	+	-
FP25	Residential led (Mixed-use)	+/-	--	-	+/-	--	-	++	-	-	++	+	+/-
FP4	Residential led	+/-	--	-	+/-	-	+	+	-	-	++	+	+
FP5	Residential led	+/-	--	-	+/-	-	+	+	-	-	++	+	-
FP6	Residential led	+/-	-	-	+/-	--	+	++	-	--	++	+	-
FP7	Residential led	+/-	--	-	+/-	-	+	+	-	--	++	+	-
FP8	Residential led	+/-	-	-	+/-	-	+	+	-	0	++	+	-
FP9	Residential led	+/-	--	-	+/-	-	+	+	-	--	++	+	-
GN10	Residential led	+/-	+	--	-	-	-	+	-	0	+	-	+
GN11	Residential led	+/-	-	-	+/-	-	+	+	-	0	-	+	+
GN13	Residential led	+/-	--	--	+/-	-	-	+	-	0	+	-	--
GN14	Residential led	+/-	--	-	-	-	+	+	+	0	++	+	-
GN15	Residential led (Mixed-use)	+/-	--	--	-	--	+	++	-	0	++	+	+/-
GN3	Residential led	+/-	--	-	+/-	--	+	++	+	0	++	+	--
GN4	Residential led	+/-	--	-	-	-	+	+	+	0	++	+	+
GN5	Residential led	+/-	-	-	+/-	-	-	+	+	0	++	+	+
GN6	Residential led (Mixed-use)	+/-	--	--	-	--	-	++	+	-	++	-	+/-

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
GN8	Residential led	+/-	+	-	+/-	-	-	+	-	-	+	+	+
GS1	Residential led	+/-	-	-	+/-	-	+	+	+	-	++	+	+
GS10	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
GS11	Residential led	+/-	-	-	+/-	-	+	+	+	0	++	+	-
GS12	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
GS13	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	-
GS14	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
GS18	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	+	+	0	++	+	+/-
GS19	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	+
GS2	Residential led	+/-	+	-	-	-	-	+	+	-	++	+	+
GS20	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	+
GS23	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	+
GS24	Residential led	+/-	-	-	+/-	-	+	+	-	0	++	+	-
GS26	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	-
GS27	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
GS29	Residential led	+/-	-	-	+/-	-	+	+	+	0	++	+	-
GS30	Residential led	+/-	+	-	+/-	-	+	+	+	-	++	+	+
GS32	Residential led	+/-	+	-	+/-	-	-	+	+	0	++	+	+
GS33	Residential led	+/-	+	-	+/-	-	-	+	-	0	++	+	+
GS34	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	+
GS35	Residential led	+/-	+	-	-	-	+	+	-	0	++	+	+
GS37	Residential led (Mixed-use)	+/-	--	-	+/-	--	+	++	+	-	++	+	+/-
GS4	Residential led	+/-	+	-	+/-	-	+	+	+	-	++	+	-
GS5	Residential led	+/-	+	-	+/-	-	+	+	+	-	++	+	-
GS6	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	-
GS7	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
GS8	Residential led (Mixed-use)	+/-	+	-	+/-	-	-	+	+	0	++	+	+/-
HHH1	Non-residential	+/-	-	-	--	--	-	0	-	-	-	0	+/-
HHH11	Residential led	+/-	-	-	-	--	-	++	-	-	-	+	+
HHH14	Residential led	+/-	-	-	-	--	-	++	-	0	-	-	+
HHH15	Residential led	+/-	+	-	-	-	-	+	-	0	-	-	+
HHH16	Non-residential	+/-	-	-	-	--	-	0	-	0	-	0	+/-
HHH17	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	-
HHH18	Residential led (Mixed-use)	+/-	--	-	--	-	--	+/-	-	-	-	-	+/-
HHH19	Non-residential	+/-	--	-	-	--	-	0	-	0	-	0	++
HHH21	Non-residential	+/-	--	--	+/-	-	+	0	-	0	-	0	+/-
HHH23	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	-	+/-
HHH24	Residential led	+/-	-	-	-	--	-	++	-	--	-	-	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
HHH25	Residential led	+/-	-	-	-	--	-	+	-	-	-	-	+
HHH28	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	-	+/-
HHH29	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	-	+/-
HHH30	Residential led (Mixed-use)	+/-	--	-	-	-	-	+	-	0	-	-	+/-
HHH32	Residential led	+/-	--	--	--	+/-	-	+	-	0	-	-	+
HHH33	Residential led	+/-	+	-	-	--	--	++	-	--	-	-	+
HHH37	Non-residential	+/-	--	-	0	--	-	0	-	0	-	0	++
HHH38	Non-residential	+/-	--	--	0	--	-	0	-	0	-	0	++
HHH39	Non-residential	+/-	-	--	0	--	-	0	-	0	-	0	++
HHH4	Residential led	+/-	+	-	-	+/-	-	+	-	0	-	+	+
HHH40	Residential led	+/-	+	-	-	-	-	+	-	-	-	-	+
HHH41	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	-
HHH5	Residential led	+/-	+	-	--	-	-	+	-	-	-	-	+
HHH7	Residential led	+/-	-	--	--	--	--	++	-	-	-	-	-
HHH8	Residential led (Mixed-use)	+/-	--	-	-	--	--	++	-	-	-	+	+/-
HHH9	Residential led	+/-	--	-	-	-	-	+	-	0	-	+	+
HW11	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
HW3	Residential and secondary school	+/-	-	-	-	--	--	+	-	0	-	-	+
HW5	Non-residential	+/-	--	-	-	--	+	0	-	0	-	0	+/-
HW6	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
HW7	Residential or non-residential	+/-	-	-	-	--	-	+/-	-	0	-	-	+/-
HW8	Residential led	+/-	+	-	+/-	-	-	+	-	0	-	-	+
L11	Residential led	+/-	-	-	-	-	-	+	-	0	++	+	+
L12	Residential led	+/-	+	-	+/-	-	-	+	-	0	++	+	-
L2	Residential led	+/-	+	-	+/-	-	-	+	-	0	+	+	+
L3	Residential led	+/-	--	-	+/-	-	+	+	-	0	++	+	+
L7	Residential led	+/-	-	-	+/-	-	+	+	-	0	++	+	-
L9	Residential led	+/-	-	-	+/-	-	+	+	-	0	++	+	-
LW10	Residential led	+/-	--	-	-	-	-	+	-	0	-	-	+/-
LW2	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
LW3	Residential led	+/-	+	-	+/-	-	-	+	-	0	-	-	+
LW4	Residential led	+/-	--	--	-	--	--	++	-	0	-	-	+
LW5	Residential led (C2 use)	+/-	+	-	+/-	-	+	+	-	0	-	0	+/-
LW7	Residential led	+/-	-	-	-	--	--	++	-	0	-	-	+
PP1	Residential led	+/-	-	--	-	-	-	+	-	0	-	+	+
REWW 3	Residential led	+/-	--	-	+/-	-	+	+	-	0	++	+	-
RN1	Residential led	+/-	--	--	-	--	-	++	-	0	-	-	+
RN10	Residential led	+/-	-	--	-	-	-	+	-	-	-	-	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
RN11	Residential led	+/-	--	-	-	-	-	+	-	0	+	+	+
RN12	Non-residential	+/-	-	-	-	-	-	0	-	0	+	0	++
RN14	Residential led	+/-	+	--	-	-	-	+	-	-	-	-	+
RN16	Residential led	+/-	--	-	-	-	-	+	-	0	-	-	+
RN17	Residential led	+/-	--	-	-	-	-	+	-	0	-	-	+
RN18	Residential led	+/-	-	-	+/-	-	+	+	-	0	++	+	-
RN19	Residential led	+/-	+	-	-	+/-	-	+	-	0	-	-	+
RN2	Residential led (Mixed-use)	+/-	-	-	-	--	-	++	-	0	-	-	+/-
RN22	Residential led	+/-	-	-	+/-	+/-	-	+	-	0	++	+	+
RN23	Residential led	+/-	--	--	-	-	-	+	-	0	-	+	+
RN24	Residential led	+/-	+	-	+/-	-	+	+	-	0	++	+	-
RN25	Residential led	+/-	--	--	-	+/-	-	+	-	0	-	+	+
RN26	Residential led (Mixed-use)	+/-	--	--	-	-	-	+	-	0	-	-	+/-
RN27	Residential led	+/-	--	--	-	--	-	++	-	0	-	+	+
RN28	Residential led	+/-	--	-	-	-	-	+	-	0	+	+	+
RN29	Residential led	+/-	+	-	+/-	-	+	+	-	0	+	+	-
RN3	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
RN30	Residential led	+/-	+	-	-	-	-	+	-	0	+	+	+
RN31	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
RN32	Residential led	+/-	+	-	-	-	-	+	-	-	-	-	+
RN33	Non-residential	+/-	--	-	-	--	-	0	-	0	-	0	++
RN34	Residential led	+/-	-	--	-	-	-	+	-	0	+	-	+/-
RN4	Residential led (Mixed-use)	+/-	+	--	-	--	-	++	-	-	-	-	+/-
RN5	Residential led (Mixed-use)	+/-	--	--	-	--	--	++	-	-	-	-	+/-
RSE1	Non-residential	+/-	+	-	--	--	-	0	0	0	0	0	0
RSE11	Non-residential	+/-	--	-	-	-	+	0	-	-	+	0	+/-
RSE4	Residential led	+/-	--	-	--	-	-	+	-	0	-	-	+
RSE8	Residential led (Mixed-use)	+/-	+	-	-	-	-	+	-	0	-	+	+/-
RSE9	Residential led	+/-	--	-	-	-	-	+	-	0	-	+	+
RWB1	Residential led	+/-	--	-	-	-	-	+	-	0	+	-	+
RWB10	Non-residential	+/-	-	-	+/-	-	+	0	-	-	++	0	+/-
RWB11	Residential led	+/-	+	-	+/-	-	+	+	-	-	++	+	+/-
RWB12	Residential led	+/-	--	-	+/-	-	+	+	-	-	++	+	+
RWB14	Residential led	+/-	--	-	+/-	-	+	+	-	-	++	+	-
RWB15	Residential led	+/-	--	-	+/-	-	+	+	-	-	++	+	+
RWB17	Residential led	+/-	--	-	+/-	-	+	+	-	-	++	+	+
RWB18	Residential led	+/-	--	-	+/-	-	+	+	-	-	++	+	-
RWB19	Residential led (Mixed-use)	+/-	--	-	+/-	--	+	++	-	-	++	+	+/-
RWB2	Residential led	+/-	--	-	-	-	-	+	-	0	-	+	-
RWB20	Residential led	+/-	-	-	+/-	-	+	+	-	-	++	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
RWB21	Residential led	+/-	+	-	+/-	-	+	+	-	-	++	+	-
RWB23	Non-residential	+/-	--	-	+/-	-	-	0	-	-	++	0	++
RWB25	Residential led	+/-	--	-	-	--	+	++	-	-	++	-	+
RWB3	Residential led	+/-	-	-	-	-	-	+	-	0	+	+	+
RWB4	Residential led	+/-	+	-	-	-	-	+	-	0	+	+	+
RWB5	Non-residential	+/-	+	-	-	--	-	0	-	0	-	0	++
RWB6	Residential led	+/-	-	--	-	-	-	+	-	0	-	+	+
RWB8	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	+	-	-	++	-	+/-
RWB9	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	+	-	-	++	-	+/-
SMI1	Residential led	+/-	--	-	-	--	+	++	+	-	-	+	+
SMI2	Non-residential	+/-	--	-	+/-	-	+	0	-	--	++	0	++
SNF1	Residential led	+/-	--	-	-	--	-	++	-	0	-	-	+
SNF10	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	+	+	-	++	+	+/-
SNF12	Residential led	+/-	--	-	+/-	-	-	+	-	0	+	+	+
SNF13	Residential led (Mixed-use)	+/-	--	-	+/-	--	+	++	+	0	++	-	+/-
SNF15	Residential led (Mixed-use)	+/-	--	-	+/-	--	+	++	+	0	++	+	+/-
SNF16	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	-	++	+	+/-
SNF17	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	+
SNF18	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	-	+/-
SNF19	Non-residential	+/-	-	-	+/-	-	+	0	+	-	++	0	+/-
SNF2	Residential led (Mixed-use)	+/-	+	-	-	-	-	+	-	0	-	-	+/-
SNF20	Residential led	+/-	-	-	+/-	-	+	+	+	-	++	+	-
SNF21	Residential led (Mixed-use)	+/-	--	-	-	-	+	+	+	-	++	+	+/-
SNF22	Residential led (Mixed-use)	+/-	--	-	-	-	+	+	+	0	++	+	+/-
SNF23	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-
SNF24	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-
SNF25	Non-residential	+/-	--	-	-	--	+	0	+	0	++	0	+/-
SNF26	Non-residential	+/-	--	-	+/-	--	-	0	+	0	++	0	++
SNF27	Residential led	+/-	+	-	+/-	-	-	+	+	0	++	+	+
SNF28	Non-residential	+/-	--	-	+/-	-	+	0	-	0	++	0	+/-
SNF30	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-
SNF31	Residential led (Mixed-use)	+/-	--	-	+/-	-	-	+	+	0	++	+	+/-
SNF32	Residential led	+/-	--	-	+/-	-	-	+	+	0	++	-	+
SNF33	Non-residential	+/-	--	-	+/-	-	+	0	+	0	++	0	+/-
SNF34	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
SNF35	Residential led (Mixed-use)	+/-	--	-	+/-	--	+	++	-	0	++	+	+/-
SNF36	Residential led (Mixed-use)	+/-	--	-	+/-	-	-	+	+	0	++	+	+/-
SNF37	Residential led (Mixed-use)	+/-	--	-	+/-	-	-	+	+	0	++	+	+/-
SNF38	Residential led	+/-	--	-	-	-	-	+	+	0	++	+	+
SNF39	Residential led	+/-	--	-	+/-	--	-	+/-	+	-	++	+	+
SNF41	Residential led (Mixed-use)	+/-	--	-	-	--	+	++	+	-	++	+	+/-
SNF43	Residential led	+/-	--	-	-	--	-	++	-	-	++	+	+
SNF44	Residential led	+/-	+	-	+/-	-	+	+	-	-	+	+	-
SNF5	Residential led	+/-	--	-	-	-	-	+	+	0	+	+	+
SNF6	Residential led	+/-	+	-	+/-	-	-	+	+	0	+	-	+
SNF8	Residential led (Mixed-use)	+/-	-	-	-	-	+	+	+	0	++	-	+/-
SNF9	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	+	0	++	-	+/-
SR1	Residential led	+/-	+	-	-	-	-	+	-	0	-	-	-
SR10	Residential led	+/-	+	-	-	-	-	+	-	0	-	-	+
SR13	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
SR14	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
SR15	Residential led	+/-	--	-	-	-	-	+	-	-	-	-	+
SR16	Residential led	+/-	--	-	-	--	-	++	-	0	-	-	+
SR18	Residential led (Mixed-use)	+/-	--	-	-	-	-	+	-	0	-	-	+/-
SR2	Non-residential	+/-	-	--	-	--	--	0	-	0	-	0	++
SR21	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
SR22	Residential led	+/-	+	-	-	+/-	-	+	-	0	-	-	+
SR24	Residential led	+/-	--	-	-	-	-	+	-	0	-	-	+
SR25	Residential led	+/-	-	-	--	--	-	++	-	--	+	+	+/-
SR27	Residential led	+/-	+	-	--	-	-	+	-	-	+	-	+
SR29	Non-residential	+/-	--	-	+/-	-	-	0	-	0	-	0	++
SR3	Residential led	+/-	--	-	-	-	-	+	-	-	-	-	+
SR30	Residential led (Mixed-use)	+/-	-	-	+/-	--	+	++	-	0	+	-	+/-
SR31	Residential led (Mixed-use)	+/-	--	-	+/-	--	+	++	-	0	-	-	+/-
SR32	Residential led (Mixed-use)	+/-	+	--	--	-	-	+	-	0	-	+	+/-
SR33	Non-residential	+/-	-	-	+/-	-	-	0	-	0	+	0	+/-
SR34	Residential led	+/-	--	-	+/-	-	-	+	-	0	-	-	-
SR35	Non-residential	+/-	--	-	+/-	-	-	0	-	0	+	0	+/-
SR36	Residential led (Mixed-use)	+/-	--	-	+/-	--	-	++	-	0	-	-	+/-
SR37	Residential led (Mixed-use)	+/-	--	-	+/-	--	-	++	-	0	-	-	+/-
SR38	Residential led (Mixed-use)	+/-	--	-	+/-	--	-	++	-	0	-	-	+/-

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
SR39	Residential led (Mixed-use)	+/-	--	-	--	--	-	++	-	0	-	-	+/-
SR4	Residential led	+/-	--	-	-	--	-	++	-	0	-	-	+
SR40	Residential led (Mixed-use)	+/-	--	-	+/-	--	-	++	-	0	-	-	+/-
SR41	Residential led (Mixed-use)	+/-	-	-	--	-	-	+	-	0	-	-	+/-
SR42	Residential led	+/-	+	-	-	--	-	+	-	-	-	-	+
SR43	Residential led	+/-	+	--	-	-	-	+	-	-	-	-	+
SR45	Non-residential	+/-	+	--	-	-	-	0	-	-	-	0	++
SR46	Residential led	+/-	+	--	-	-	-	+	-	0	-	-	+
SR47	Residential led	+/-	-	-	-	+/-	-	+	-	-	-	-	+
SR48	Residential led	+/-	--	-	-	-	+	+	-	-	-	-	+
SR49	Residential led	+/-	--	-	-	-	-	+	-	--	-	-	+/-
SR5	Residential led	+/-	-	-	-	--	-	++	-	0	-	+	+
SR50	Residential led	+/-	--	--	-	-	+	+	-	-	-	+	+
SR51	Residential led (Mixed-use)	+/-	-	--	-	--	--	++	-	0	-	-	+/-
SR52	Residential led (Mixed-use)	+/-	--	-	-	--	--	++	-	0	-	-	+/-
SR6	Residential led (Mixed-use)	+/-	-	--	-	--	-	++	-	0	-	-	+/-
SR7	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
SR8	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
SW1	Residential led	+/-	+	-	+/-	-	+	+	-	0	-	+	+
SW2	Residential led	+/-	-	-	+/-	--	-	++	-	0	-	+	+
SW3	Residential led	+/-	+	-	+/-	-	+	+	-	0	++	+	+
SW5	Residential led	+/-	+	-	+/-	-	+	+	-	0	++	+	+
SW6	Residential led	+/-	--	-	+/-	-	-	+	+	0	++	+	-
SW7	Residential led	+/-	+	-	+/-	-	-	+	-	0	++	+	+
SW8	Residential led	+/-	+	-	+/-	-	-	+	+	0	++	-	+
T1	Non-residential	+/-	-	-	-	-	-	0	-	0	-	0	++
T2	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
T3	Residential led	+/-	-	-	-	-	-	+	+	0	++	+	+
W1	Residential led	+/-	-	-	+/-	-	-	+	+	0	++	+	+
W11	Non-residential	+/-	-	-	-	--	-	0	-	0	++	0	++
W12	Residential led	+/-	-	-	+/-	-	+	+	-	0	-	-	-
W13	Non-residential	+/-	--	-	+/-	-	-	0	-	0	-	0	+/-
W14	Non-residential	+/-	--	-	+/-	-	+	0	+	0	-	0	++
W3	Residential led	+/-	--	-	+/-	-	+	+	-	0	++	+	+
W4	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	-
W7	Residential led	+/-	--	-	+/-	-	-	+	-	0	-	+	+/-
W8	Residential led	+/-	-	-	-	-	-	+	-	0	++	+	+

I.3 Post mitigation site assessments by receptor

I.3.1 Overview

I.3.1.1 A total of 88 strategic planning policies are proposed within the Regulation 19 version of the MLP (see **Appendix H** for the full evaluation of the policies). The MLP policies are anticipated to improve the sustainability performance of many of the reasonable alternative sites through the elimination or minimisation of adverse effects and optimising positive effects.

I.3.1.2 Within this chapter, a series of tables is set out to summarise the potential adverse impacts that have been identified through the assessment of sites pre-mitigation for each SA Objective (as summarised in **Chapter I.2**, and discussed in full within **Appendix F** and **G**), and indicate which of the emerging MLP policies will be likely to mitigate or reduce these effects.

I.3.1.3 For each SA Objective, the policy mitigation table is followed by post-mitigation impact matrices for each reasonable alternative site, set out per receptor. The overall impact matrix of all reasonable alternative site assessments post-mitigation is presented within **Table I.4.1** (strategic sites) and **Table I.4.2** (non-strategic sites). These impacts have been identified following consideration of the likely mitigation effects of the MLP policies as discussed in the adverse effects and policy mitigation tables below.

I.3.1.4 It should be noted that the 14 site allocation policies presented in the MLP, and assessed within **Appendix K**, have not informed the post-mitigation assessments as they do not relate to all reasonable alternative sites.

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I.3.2 SA Objective 1: Climate change mitigation

Table I.3.1: *Identified adverse effects and policy mitigation for SA1: Climate change mitigation*

Identified adverse impact	Potential mitigating influence of MLP policies
Increased carbon emissions	Policy S1 (Planning for climate change) ensures that development proposals will include opportunities for adaptation to, and the mitigation of climate change to progress towards achieving net zero carbon in Medway by 2050. The policy includes measures to promote effective spatial planning, use of renewable and low carbon technologies and design, delivery of green infrastructure, and management of water resources and flood risk. The criteria of Policy S1 are underpinned by Policy DM3 (Air quality), Policy DM6 (Sustainable design and construction), Policy S25 (Energy supply) and Policy T41 (Heat networks), collectively aiming to reduce Medway's carbon footprint. Policy DM3 aims to maximise opportunities to improve local air quality and subsequently decrease and avoid exposure to GHG emissions in some areas, including through the installation of electric charging points and introducing low Nitrous Oxide (NO_2) boilers. Policy DM6 requires development proposals to meet building regulations for energy efficiency and address the climate emergency with regard to Medway's current Climate Action Plan and Corporate Strategy. Policy S25 aims to promote development which supports renewable and low carbon energy technologies, including low carbon hydrogen production. Policy T41 ensures that development proposals of 10 dwellings/1,000 sqm or more follow the heat network provision hierarchy to promote efficient use of resources. Various local plan policies, including T26 (Accessibility standards), DM16 (Chatham Waters Line) and T20 (Riverside path) are likely to contribute to reduced GHG emissions through providing accessible active travel corridors and reducing reliance on travel via private car.

I.3.2.1 The policies discussed within **Table I.3.1** support a reduction in GHG emissions associated with development through the encouragement of sustainable transport, facilitation of electric vehicles, low carbon technologies and enhanced GI coverage that will be likely to contribute to carbon storage functions. However, without knowledge of site-specific design, layout and uptake of these features, uncertainty remains regarding whether the MLP policies will fully address the potential impacts, including from embodied carbon, emissions from the construction and operation of development, potential loss of carbon stores, and managing increased heat risk. As such, the potential GHG emissions associated with the proposed development across all reasonable alternative sites remain uncertain.

I.3.3 SA Objective 2: Climate change adaptation

Table I.3.2: *Identified adverse effects and policy mitigation for SA2: Climate change adaptation*

Identified adverse impact	Potential mitigating influence of MLP policies
Risk of fluvial and tidal flooding (current and future)	Policy DM1 (Flood and water management) seeks to minimise flood risk through providing site-specific flood risk assessments by carrying out Sequential and Exception testing, and through providing flood risk management infrastructure where required. This includes locating development in areas of low flood risk, maintaining flood risk infrastructure, and contributing towards to Environment Agency's flood risk management programme. Policy S5 (Securing strong green and blue infrastructure) encourages the use of green infrastructure to manage flood risk and adapt to the impacts of climate change. Both Policy T28 (Existing open space, outdoor sports and play spaces) and Policy DM21 (New open space, outdoor sports and play spaces) encourage the use of well-managed open spaces to help mitigate flood risk.
Risk of surface water flooding	Policy DM1 (Flood and water management) seeks to minimise surface water flood risk through providing site-specific flood risk assessments and providing flood risk management infrastructure where required. This includes preparing Surface Water Drainage Strategies including the implementation of Sustainable Urban Drainage (SuDs) which replicate greenfield runoff rates. Policy S5 (Securing strong green and blue infrastructure) encourages the use of green infrastructure to manage surface water flood risk and includes the implementation and management of SuDs. Policy T28 (Existing open space, outdoor sports and play spaces) and Policy DM21 (New open space, outdoor sports and play spaces) both encourage the use of well-managed open spaces to help mitigate surface water flood risk.
Reduced viability of flood defences	Policy DM1 (Flood and water management) states that *"development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted unless it can be suitably mitigated".* This includes continued inspection, maintenance, repair and replacement of the existing flood defences.

Risk of fluvial flooding (current and future)

I.3.3.1 The MLP policies discussed within **Table I.3.2** are expected to mitigate potential adverse impacts associated with development in areas at risk to fluvial flooding to some extent; however, the policies are not expected to fully mitigate fluvial and tidal flood risk where a large proportion of a development proposal coincides with Flood Zone 2 and/or Flood Zone 3.

I.3.3.2 Furthermore, the effect of the proposed 'opportunity area' for development at Site SR53 on flood risk remains uncertain at this stage, given the potential for the site to incorporate a strategic approach to flood mitigation that will be subject to further liaison with the Council and Environment Agency.

Risk of surface water flooding

I.3.3.3 The MLP policies discussed within **Table I.3.2** are likely to mitigate potential adverse impacts associated with development in areas at risk of surface water flooding, as they are expected to replicate greenfield runoff rates where development coincides with areas of surface water flood risk.

Reduced viability of flood defences

I.3.3.4 The MLP policies discussed within **Table I.3.2** are expected to mitigate potential adverse impacts where development proposals may impact the viability of flood defences, through locating development away from flood defences or permitting it only where it can be suitably mitigated.

Table I.3.3: *Strategic sites post-mitigation impact matrix for SA Objective 2 – Climate change adaptation*

Site ref.	Site use	Flood Zones	SWFR	Flood defences
AS13	Residential led (Mixed-use)	-	0	0
AS21	Residential led (Mixed-use)	+	0	0
AS22	Residential led (Mixed-use)	-	0	0
AS24	Non-residential	-	0	0
AS26	Non-residential	-	0	0
CHR4	Residential led (Mixed-use)	+	0	0
HHH12	Residential led (Mixed-use)	+	0	0
HHH22	Residential led (Mixed-use)	+	0	0
HHH22/HHH31	Residential led (Mixed-use)	-	0	0
HHH26	Residential led (Mixed-use)	+	0	0
HHH3	Residential led	+	0	0
HHH31	Residential led (Mixed-use)	-	0	0
HHH35	Non-residential	-	0	0
HHH36	Non-residential	-	0	0
HHH6	Residential led (Mixed-use)	+	0	0
HW1	Residential led	+	0	0
LW6	Residential led	+	0	0
LW8	Residential led	+	0	0
RN8	Residential led (Mixed-use)	+	0	0
RN9	Residential led	+	0	0
RSE10	Residential led (Mixed-use)	+	0	0
SMI5	Non-residential	-	0	0
SMI6	Residential led (Mixed-use)	-	0	0
SNF3	Residential led	+	0	0
SR17	Residential led (Mixed-use)	+	0	0
SR9	Residential led (Mixed-use)	+	0	0
SR53	Residential led (Mixed-use opportunity area)	+/-	0	0

Table I.3.4: *Non-strategic sites post-mitigation impact matrix for SA Objective 2 – Climate change adaptation*

Site ref.	Site use	Flood Zones	SWFR	Flood defences
AS1	Residential led	+	0	0
AS10	Residential led	+	0	0
AS11	Residential led (Mixed-use)	+	0	0
AS14	Residential led	+	0	0
AS15	Residential led	-	0	0
AS16	Residential led (Mixed-use)	+	0	0
AS17	Residential led	-	0	0
AS18	Residential led	+	0	0
AS2	Residential led	+	0	0
AS20	Residential led (Mixed-use)	+	0	0
AS23	Residential led (park homes)	+	0	0
AS25	Residential led	+	0	0
AS28	Residential led	-	0	0
AS29	Residential led	+	0	0
AS3	Residential led	+	0	0
AS5	Residential led (Mixed-use)	+	0	0
AS6	Residential led (Mixed-use)	+	0	0
AS7	Non-residential	+	0	0
AS8	Non-residential	+	0	0
AS9	Non-residential	-	0	0
CCB1	Residential led	+	0	0
CCB10	Residential led (Mixed-use)	+	0	0
CCB11	Residential led	+	0	0
CCB12	Residential led (Mixed-use)	+	0	0
CCB13	Residential led (Mixed-use)	-	0	0
CCB15	Residential led (Mixed-use)	+	0	0
CCB16	Residential led	-	0	0
CCB17	Residential led (Mixed-use)	-	0	0
CCB18	Residential led	+	0	0
CCB19	Residential led (Mixed-use)	+	0	0
CCB2	Residential led (Mixed-use)	+	0	0
CCB20	Residential led (Mixed-use)	-	0	0
CCB21	Residential led (Mixed-use)	-	0	0
CCB22	Residential led	-	0	0
CCB23	Residential led (Mixed-use)	-	0	0
CCB24	Residential led (Mixed-use)	-	0	0
CCB25	Residential led	-	0	0
CCB26	Residential led (Mixed-use)	-	0	0
CCB27	Residential led (Mixed-use)	-	0	0
CCB28	Residential led	+	0	0
CCB29	Residential led	+	0	0
CCB3	Residential led (Mixed-use)	+	0	0
CCB30	Residential led (Mixed-use)	+	0	0
CCB31	Residential led	-	0	0
CCB33	Residential led	+	0	0
CCB34	Residential led (Mixed-use)	+	0	0
CCB35	Non-residential	-	0	0
CCB36	Residential led (Mixed-use)	+	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
CCB37	Residential led (Mixed-use)	+	0	0
CCB38	Residential led	+	0	0
CCB39	Residential led	+	0	0
CCB4	Residential led	+	0	0
CCB40	Residential led	+	0	0
CCB41	Residential led	+	0	0
CCB43	Residential led	-	0	0
CCB44	Residential led	+	0	0
CCB46	Residential led	+	0	0
CCB48	Residential led	+	0	0
CCB49	Residential led	+	0	0
CCB5	Non-residential	-	0	0
CCB6	Residential led (Mixed-use)	+	0	0
CCB7	Residential led (Mixed-use)	-	0	0
CCB8	Residential led	-	0	0
CCB9	Residential led	+	0	0
CHR1	Residential led	+	0	0
CHR10	Residential led	+	0	0
CHR11	Residential led	+	0	0
CHR13	Residential led (Gypsy and Traveller)	+	0	0
CHR14	Residential led (Mixed-use)	-	0	0
CHR15	Non-residential	+	0	0
CHR16	Non-residential	+	0	0
CHR17	Non-residential	+	0	0
CHR18	Non-residential	+	0	0
CHR19	Non-residential	+	0	0
CHR2	Non-residential	+	0	0
CHR20	Residential led	-	0	0
CHR21	Non-residential	-	0	0
CHR3	Non-residential	+	0	0
CHR5	Non-residential	+	0	0
CHR6	Residential led	+	0	0
CHR7	Residential led	+	0	0
CHR8	Non-residential	-	0	0
FH1	Non-residential	+	0	0
FP1	Residential led	+	0	0
FP10	Residential led	+	0	0
FP11	Residential led (Mixed-use)	-	0	0
FP12	Residential led	+	0	0
FP14	Residential led	+	0	0
FP16	Residential led (Mixed-use)	+	0	0
FP17	Residential led	+	0	0
FP18	Residential led	-	0	0
FP19	Residential led	+	0	0
FP2	Residential led	-	0	0
FP22	Residential led	+	0	0
FP23	Residential led	-	0	0
FP25	Residential led (Mixed-use)	+	0	0
FP4	Residential led	-	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
FP5	Residential led	-	0	0
FP6	Residential led	+	0	0
FP7	Residential led	-	0	0
FP8	Residential led	+	0	0
FP9	Residential led	-	0	0
GN10	Residential led	+	0	0
GN11	Residential led	+	0	0
GN13	Residential led	-	0	0
GN14	Residential led	-	0	0
GN15	Residential led (Mixed-use)	-	0	0
GN3	Residential led	-	0	0
GN4	Residential led	-	0	0
GN5	Residential led	+	0	0
GN6	Residential led (Mixed-use)	-	0	0
GN8	Residential led	+	0	0
GS1	Residential led	+	0	0
GS10	Residential led (Mixed-use)	+	0	0
GS11	Residential led	+	0	0
GS12	Residential led (Mixed-use)	+	0	0
GS13	Residential led	+	0	0
GS14	Residential led (Mixed-use)	+	0	0
GS18	Residential led (Mixed-use)	+	0	0
GS19	Residential led	+	0	0
GS2	Residential led	+	0	0
GS20	Residential led	+	0	0
GS23	Residential led	+	0	0
GS24	Residential led	+	0	0
GS26	Residential led	+	0	0
GS27	Residential led (Mixed-use)	+	0	0
GS29	Residential led	+	0	0
GS30	Residential led	+	0	0
GS32	Residential led	+	0	0
GS33	Residential led	+	0	0
GS34	Residential led	+	0	0
GS35	Residential led	+	0	0
GS37	Residential led (Mixed-use)	+	0	0
GS4	Residential led	+	0	0
GS5	Residential led	+	0	0
GS6	Residential led	+	0	0
GS7	Residential led (Mixed-use)	+	0	0
GS8	Residential led (Mixed-use)	+	0	0
HHH1	Non-residential	+	0	0
HHH11	Residential led	+	0	0
HHH14	Residential led	+	0	0
HHH15	Residential led	+	0	0
HHH16	Non-residential	+	0	0
HHH17	Residential led	+	0	0
HHH18	Residential led (Mixed-use)	+	0	0
HHH19	Non-residential	+	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
HHH21	Non-residential	-	0	0
HHH23	Residential led (Mixed-use)	+	0	0
HHH24	Residential led	+	0	0
HHH25	Residential led	+	0	0
HHH28	Residential led (Mixed-use)	+	0	0
HHH29	Residential led (Mixed-use)	+	0	0
HHH30	Residential led (Mixed-use)	-	0	0
HHH32	Residential led	-	0	0
HHH33	Residential led	+	0	0
HHH37	Non-residential	-	0	0
HHH38	Non-residential	-	0	0
HHH39	Non-residential	+	0	0
HHH4	Residential led	+	0	0
HHH40	Residential led	+	0	0
HHH41	Residential led	+	0	0
HHH5	Residential led	+	0	0
HHH7	Residential led	+	0	0
HHH8	Residential led (Mixed-use)	+	0	0
HHH9	Residential led	+	0	0
HW11	Residential led	+	0	0
HW3	Residential and secondary school	+	0	0
HW5	Non-residential	+	0	0
HW6	Residential led	+	0	0
HW7	Residential or non-residential	+	0	0
HW8	Residential led	+	0	0
L11	Residential led	+	0	0
L12	Residential led	+	0	0
L2	Residential led	+	0	0
L3	Residential led	+	0	0
L7	Residential led	+	0	0
L9	Residential led	+	0	0
LW10	Residential led	+	0	0
LW2	Residential led	+	0	0
LW3	Residential led	+	0	0
LW4	Residential led	+	0	0
LW5	Residential led (C2 use)	+	0	0
LW7	Residential led	+	0	0
PP1	Residential led	+	0	0
REWW3	Residential led	+	0	0
RN1	Residential led	-	0	0
RN10	Residential led	+	0	0
RN11	Residential led	+	0	0
RN12	Non-residential	+	0	0
RN14	Residential led	+	0	0
RN16	Residential led	+	0	0
RN17	Residential led	+	0	0
RN18	Residential led	+	0	0
RN19	Residential led	+	0	0
RN2	Residential led (Mixed-use)	+	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
RN22	Residential led	+	0	0
RN23	Residential led	+	0	0
RN24	Residential led	+	0	0
RN25	Residential led	+	0	0
RN26	Residential led (Mixed-use)	-	0	0
RN27	Residential led	+	0	0
RN28	Residential led	+	0	0
RN29	Residential led	+	0	0
RN3	Residential led	+	0	0
RN30	Residential led	+	0	0
RN31	Residential led	+	0	0
RN32	Residential led	+	0	0
RN33	Non-residential	+	0	0
RN34	Residential led	+	0	0
RN4	Residential led (Mixed-use)	+	0	0
RN5	Residential led (Mixed-use)	+	0	0
RSE1	Non-residential	+	0	0
RSE11	Non-residential	+	0	0
RSE4	Residential led	+	0	0
RSE8	Residential led (Mixed-use)	+	0	0
RSE9	Residential led	+	0	0
RWB1	Residential led	+	0	0
RWB10	Non-residential	+	0	0
RWB11	Residential led	+	0	0
RWB12	Residential led	+	0	0
RWB14	Residential led	+	0	0
RWB15	Residential led	+	0	0
RWB17	Residential led	+	0	0
RWB18	Residential led	+	0	0
RWB19	Residential led (Mixed-use)	+	0	0
RWB2	Residential led	-	0	0
RWB20	Residential led	+	0	0
RWB21	Residential led	+	0	0
RWB23	Non-residential	+	0	0
RWB25	Residential led	-	0	0
RWB3	Residential led	+	0	0
RWB4	Residential led	+	0	0
RWB5	Non-residential	+	0	0
RWB6	Residential led	+	0	0
RWB8	Residential led (Mixed-use)	+	0	0
RWB9	Residential led (Mixed-use)	+	0	0
SMI1	Residential led	-	0	0
SMI2	Non-residential	-	0	0
SNF1	Residential led	+	0	0
SNF10	Residential led (Mixed-use)	+	0	0
SNF12	Residential led	+	0	0
SNF13	Residential led (Mixed-use)	-	0	0
SNF15	Residential led (Mixed-use)	-	0	0
SNF16	Residential led (Mixed-use)	+	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
SNF17	Residential led	+	0	0
SNF18	Residential led (Mixed-use)	-	0	0
SNF19	Non-residential	+	0	0
SNF2	Residential led (Mixed-use)	+	0	0
SNF20	Residential led	+	0	0
SNF21	Residential led (Mixed-use)	-	0	0
SNF22	Residential led (Mixed-use)	-	0	0
SNF23	Residential led (Mixed-use)	-	0	0
SNF24	Residential led (Mixed-use)	-	0	0
SNF25	Non-residential	-	0	0
SNF26	Non-residential	-	0	0
SNF27	Residential led	+	0	0
SNF28	Non-residential	-	0	0
SNF30	Residential led (Mixed-use)	-	0	0
SNF31	Residential led (Mixed-use)	-	0	0
SNF32	Residential led	-	0	0
SNF33	Non-residential	-	0	0
SNF34	Residential led (Mixed-use)	-	0	0
SNF35	Residential led (Mixed-use)	-	0	0
SNF36	Residential led (Mixed-use)	-	0	0
SNF37	Residential led (Mixed-use)	-	0	0
SNF38	Residential led	-	0	0
SNF39	Residential led	-	0	0
SNF41	Residential led (Mixed-use)	-	0	0
SNF43	Residential led	-	0	0
SNF44	Residential led	+	0	0
SNF5	Residential led	+	0	0
SNF6	Residential led	+	0	0
SNF8	Residential led (Mixed-use)	+	0	0
SNF9	Residential led (Mixed-use)	+	0	0
SR1	Residential led	+	0	0
SR10	Residential led	+	0	0
SR13	Residential led	+	0	0
SR14	Residential led	+	0	0
SR15	Residential led	+	0	0
SR16	Residential led	+	0	0
SR18	Residential led (Mixed-use)	+	0	0
SR2	Non-residential	+	0	0
SR21	Residential led	+	0	0
SR22	Residential led	+	0	0
SR24	Residential led	+	0	0
SR25	Residential led	+	0	0
SR27	Residential led	+	0	0
SR29	Non-residential	-	0	0
SR3	Residential led	+	0	0
SR30	Residential led (Mixed-use)	-	0	0
SR31	Residential led (Mixed-use)	-	0	0
SR32	Residential led (Mixed-use)	+	0	0
SR33	Non-residential	-	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
SR34	Residential led	-	0	0
SR35	Non-residential	-	0	0
SR36	Residential led (Mixed-use)	-	0	0
SR37	Residential led (Mixed-use)	-	0	0
SR38	Residential led (Mixed-use)	-	0	0
SR39	Residential led (Mixed-use)	-	0	0
SR4	Residential led	+	0	0
SR40	Residential led (Mixed-use)	+	0	0
SR41	Residential led (Mixed-use)	+	0	0
SR42	Residential led	+	0	0
SR43	Residential led	+	0	0
SR45	Non-residential	+	0	0
SR46	Residential led	+	0	0
SR47	Residential led	+	0	0
SR48	Residential led	-	0	0
SR49	Residential led	-	0	0
SR5	Residential led	+	0	0
SR50	Residential led	-	0	0
SR51	Residential led (Mixed-use)	+	0	0
SR52	Residential led (Mixed-use)	+	0	0
SR6	Residential led (Mixed-use)	+	0	0
SR7	Residential led	+	0	0
SR8	Residential led	+	0	0
SW1	Residential led	+	0	0
SW2	Residential led	+	0	0
SW3	Residential led	+	0	0
SW5	Residential led	+	0	0
SW6	Residential led	+	0	0
SW7	Residential led	+	0	0
SW8	Residential led	+	0	0
T1	Non-residential	+	0	0
T2	Residential led	+	0	0
T3	Residential led	+	0	0
W1	Residential led	+	0	0
W11	Non-residential	+	0	0
W12	Residential led	+	0	0
W13	Non-residential	+	0	0
W14	Non-residential	+	0	0
W3	Residential led	+	0	0
W4	Residential led	+	0	0
W7	Residential led	+	0	0
W8	Residential led	+	0	0

I.3.4 SA Objective 3: Biodiversity and geodiversity

Table I.3.5: *Identified adverse effects and policy mitigation for SA3: Biodiversity, Flora, Fauna, and Geodiversity*

Identified adverse impact	Potential mitigating influence of MLP policies
Threats or pressures to international or European sites (SACs, SPAs and Ramsar)	Policy S3 (North Kent Estuary and Marshes designated sites) states that *"New residential development within a 6km Zone of Influence from the North Kent Estuary and Marshes designated sites will need to make a defined tariff contribution to a strategic package of measures agreed by the North Kent SAMMS, 'Bird Wise' Board, or undertake their own Habitats Regulation Assessment"* Additionally, larger sites beyond the 6km buffer may need to secure appropriate mitigation to offset adverse effects associated with recreational pressure on the European sites. Subject to the findings of the HRA, Policy S3 would be anticipated to prevent adverse impacts to European sites. Policy S2 (Conservation and enhancement of the natural environment) requires that development proposals to strengthen biodiversity networks and ensure an effective mitigation approach in particularly sensitive locations, including European sites. Policy S5 (Securing strong green and blue infrastructure) encourages the use of green infrastructure to provide the highest level of protection for European sites.
Threats or pressures to nationally designated sites (NNRs, SSSIs and MCZs)	Policy S2 (Conservation and enhancement of the natural environment) promotes the conservation, restoration and enhancement of Marine Conservation Zones, NNRs and SSSIs in Medway, by recognising the protection given by these designations and demonstrating that significant harm to biodiversity would be avoided. Policy S5 (Securing strong green and blue infrastructure) encourages the use of green infrastructure to provide a high level of protection for nationally designated sites. Other policies, including Policy T10 (Gypsy, Travellers and Travelling Showpeople) and Policy T22 (Marinas and moorings) require development proposals to be located away, or have consideration for nationally designated sites.
Threats or pressures to locally designated / non-statutory biodiversity or geodiversity sites, priority habitats and species	Policy S2 (Conservation and enhancement of the natural environment) promotes the conservation, restoration and enhancement of LNRs, LWSs and ancient woodland in Medway, by recognising the protection given by these designations and non-statutory sites, demonstrating that significant harm to biodiversity would be avoided. In addition, development proposals will provide a measurable net gain of 10% BNG in line with national requirements. The Kent and Medway Local Nature Recovery Strategy is currently in progress, which is likely to encourage opportunities to improve habitat connectivity. Policy S5 (Securing strong green and blue infrastructure) encourages the use of green infrastructure to provide protection for locally designated sites and non-statutory biodiversity sites. Policy T1 (Promoting high quality design) protects existing trees and aims to establishes new landscape features that promote biodiversity.

Threats or pressures to international or European sites (SACs, SPAs and Ramsar)

I.3.4.1 The Regulation 19 Interim HRA Appropriate Assessment (AA)[2] has concluded no adverse impacts on the site integrity of any European site due to a change in water quality or water quantity, or urbanisation effects as a result of the MLP either alone or in-combination. The Interim HRA has however not been able to reach a conclusion regarding adverse air quality and recreational impacts upon the site integrity of the North Kent Marshes European sites (Medway Estuary and Marshes SPA/Ramsar, Thames Estuary and Marshes SPA/Ramsar and Swale SPA/Ramsar) and the North Down Woodlands SAC. Further air quality modelling work and a final Hoo Peninsula Strategic Environmental Programme will inform a full AA of air quality and recreational impacts.

I.3.4.2 Although the policies discussed within **Table I.3.5** seek to mitigate potential adverse impacts on European sites, the HRA is not yet finalised; consequently, the potential effect on European sites is uncertain.

I.3.4.3 **Threats or pressures to nationally designated sites (NNRs, SSSIs and MCZs)**

The policies discussed within **Table I.3.5** will help to mitigate potential adverse impacts identified on NNRs, MCZs and SSSIs for the majority of sites. Policy S2 details the proposed Hoo Peninsula Strategic Environmental Programme which will provide a strategic approach to protecting designated sites. However, at this stage, and whilst this programme is still in development, the policies are not anticipated to fully mitigate adverse effects on SSSIs where proposed sites coincide with or are located directly adjacent to SSSIs (Sites AS28, CHR2, CHR3, GN13, GN15, GN6, HHH7, SR2, SR32, SR50, SR51, SR6), or where sites are located within 400m of Lodge Hill SSSI (Sites HHH1, HHH40, HHH5, SR14, SR24, SR41, SR52). These sites should be subject to specific consultation with Natural England. Additionally, the policies are unlikely to mitigate the direct adverse effects associated with development at Site CHR3 that coincides with the newly designated North Kent Woods and Downs NNR.

I.3.4.4 **Threats or pressures to locally designated / non-statutory biodiversity or geodiversity sites, priority habitats and species**

The policies discussed within **Table I.3.5** are likely to mitigate potential adverse impacts where development proposals may impact locally designated or non-statutory biodiversity or geodiversity sites, and will deliver BNG which contributes to improving biodiversity and habitat connectivity.

Table I.3.6: *Strategic sites post-mitigation impact matrix for SA Objective 3 – Biodiversity and geodiversity*

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
AS13	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
AS21	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
AS22	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
AS24	Non-residential	+/-	--	0	0	0	0	-	0	0	0
AS26	Non-residential	+/-	--	0	0	0	0	-	0	0	0

[2] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

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Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
CHR4	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH12	Residential led (Mixed-use)	+/-	--	0	0	0	0	-	0	0	0
HHH22	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH22/HHH31	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH26	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH3	Residential led	+/-	--	0	0	0	0	0	0	0	0
HHH31	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH35	Non-residential	+/-	0	0	0	0	0	0	0	0	0
HHH36	Non-residential	+/-	--	0	0	0	0	-	0	0	0
HHH6	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HW1	Residential led	+/-	0	0	0	0	0	0	0	0	0
LW6	Residential led	+/-	0	0	0	0	0	0	0	0	0
LW8	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN8	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
RN9	Residential led	+/-	0	0	0	0	0	0	0	0	0
RSE10	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SMI5	Non-residential	+/-	-	0	0	0	0	-	0	0	0
SMI6	Residential led (Mixed-use)	+/-	-	0	0	0	0	-	0	0	0
SNF3	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR17	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SR9	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SR53	Residential led (Mixed-use opportunity area)	+/-	0	0	0	0	0	-	0	0	0

Table I.3.7: *Non-strategic sites post-mitigation impact matrix for SA Objective 3 – Biodiversity and geodiversity*

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
AS1	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS10	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS11	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
AS14	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS15	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS16	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
AS17	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS18	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS2	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS20	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
AS23	Residential led (park homes)	+/-	0	0	0	0	0	0	0	0	0
AS25	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS28	Residential led	+/-	-	0	0	0	0	0	0	0	0
AS29	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS3	Residential led	+/-	0	0	0	0	0	0	0	0	0
AS5	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
AS6	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
AS7	Non-residential	+/-	0	0	0	0	0	0	0	0	0
AS8	Non-residential	+/-	0	0	0	0	0	0	0	0	0
AS9	Non-residential	+/-	0	0	0	0	0	0	0	0	0
CCB1	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB10	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB11	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB12	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB13	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB15	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB16	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB17	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB18	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB19	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB2	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB20	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB21	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB22	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB23	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB24	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB25	Residential led	+/-	0	0	0	0	0	-	0	0	-
CCB26	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB27	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB28	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB29	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB3	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB30	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB31	Residential led	+/-	0	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
CCB33	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB34	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB35	Non-residential	+/-	0	0	0	0	0	0	0	0	0
CCB36	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB37	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB38	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB39	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB4	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB40	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB41	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB43	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB44	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB46	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB48	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB49	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB5	Non-residential	+/-	0	0	0	0	0	-	0	0	0
CCB6	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB7	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
CCB8	Residential led	+/-	0	0	0	0	0	0	0	0	0
CCB9	Residential led	+/-	0	0	0	0	0	0	0	0	0
CHR1	Residential led	+/-	0	0	0	0	0	0	0	0	0
CHR10	Residential led	+/-	0	0	0	0	0	0	0	0	0
CHR11	Residential led	+/-	0	0	0	0	0	0	0	0	0
CHR13	Residential led (Gypsy and Traveller)	+/-	0	0	0	0	0	0	0	0	0
CHR14	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0
CHR15	Non-residential	+/-	0	0	0	0	0	0	0	0	0
CHR16	Non-residential	+/-	0	0	0	0	0	0	0	0	0
CHR17	Non-residential	+/-	0	0	0	0	0	0	0	0	0
CHR18	Non-residential	+/-	0	0	0	0	0	0	0	0	0
CHR19	Non-residential	+/-	0	0	0	0	0	0	0	0	0
CHR2	Non-residential	+/-	-	0	0	0	0	0	0	0	0
CHR20	Residential led	+/-	0	0	0	0	0	0	0	0	0
CHR21	Non-residential	+/-	0	0	0	0	0	0	0	0	0
CHR3	Non-residential	+/-	-	--	0	0	0	0	0	0	0
CHR5	Non-residential	+/-	0	0	0	0	0	0	0	0	0
CHR6	Residential led	+/-	0	0	0	0	0	0	0	0	0
CHR7	Residential led	+/-	0	0	0	0	0	0	0	0	0
CHR8	Non-residential	+/-	0	0	0	0	0	0	0	0	0
FH1	Non-residential	+/-	0	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
FP1	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP10	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP11	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0
FP12	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP14	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP16	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
FP17	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP18	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP19	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP2	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP22	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP23	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP25	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
FP4	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP5	Residential led	+/-	0	0	0	0	0	-	0	0	0
FP6	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP7	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP8	Residential led	+/-	0	0	0	0	0	0	0	0	0
FP9	Residential led	+/-	0	0	0	0	0	-	0	0	0
GN10	Residential led	+/-	0	0	0	0	0	0	0	0	0
GN11	Residential led	+/-	0	0	0	0	0	0	0	0	0
GN13	Residential led	+/-	-	0	0	0	0	-	0	0	0
GN14	Residential led	+/-	0	0	0	0	0	0	0	0	0
GN15	Residential led (Mixed-use)	+/-	-	0	0	0	0	-	0	0	0
GN3	Residential led	+/-	0	0	0	0	0	0	0	0	0
GN4	Residential led	+/-	0	0	0	0	0	0	0	0	0
GN5	Residential led	+/-	0	0	0	0	0	0	0	0	0
GN6	Residential led (Mixed-use)	+/-	-	0	0	0	0	-	0	0	0
GN8	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS1	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS10	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
GS11	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS12	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
GS13	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS14	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
GS18	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
GS19	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS2	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS20	Residential led	+/-	0	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
GS23	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS24	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS26	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS27	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
GS29	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS30	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS32	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS33	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS34	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS35	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS37	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
GS4	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS5	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS6	Residential led	+/-	0	0	0	0	0	0	0	0	0
GS7	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
GS8	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH1	Non-residential	+/-	-	0	0	0	0	0	0	0	0
HHH11	Residential led	+/-	0	0	0	0	0	0	0	0	0
HHH14	Residential led	+/-	0	0	0	0	0	0	0	0	0
HHH15	Residential led	+/-	0	0	0	0	0	0	0	0	0
HHH16	Non-residential	+/-	0	0	0	0	0	0	0	0	0
HHH17	Residential led	+/-	0	0	0	0	0	0	0	0	0
HHH18	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH19	Non-residential	+/-	0	0	0	0	0	0	0	0	0
HHH21	Non-residential	+/-	0	0	0	0	0	0	0	0	0
HHH23	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH24	Residential led	+/-	0	0	0	0	0	0	0	0	0
HHH25	Residential led	+/-	0	0	0	0	0	0	0	0	0
HHH28	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH29	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH30	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH32	Residential led	+/-	0	0	0	0	0	0	0	0	0
HHH33	Residential led	+/-	0	0	0	0	0	0	0	0	0
HHH37	Non-residential	+/-	0	0	0	0	0	0	0	0	0
HHH38	Non-residential	+/-	0	0	0	0	0	0	0	0	0
HHH39	Non-residential	+/-	0	0	0	0	0	0	0	0	0
HHH4	Residential led	+/-	0	0	0	0	0	0	0	0	0
HHH40	Residential led	+/-	-	0	0	0	0	0	0	0	0
HHH41	Residential led	+/-	0	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
HHH5	Residential led	+/-	-	0	0	0	0	0	0	0	0
HHH7	Residential led	+/-	--	0	0	0	0	0	0	0	0
HHH8	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
HHH9	Residential led	+/-	0	0	0	0	0	0	0	0	0
HW11	Residential led	+/-	0	0	0	0	0	0	0	0	0
HW3	Residential and secondary school	+/-	0	0	0	0	0	0	0	0	0
HW5	Non-residential	+/-	0	0	0	0	0	0	0	0	0
HW6	Residential led	+/-	0	0	0	0	0	0	0	0	0
HW7	Residential or non-residential	+/-	0	0	0	0	0	0	0	0	0
HW8	Residential led	+/-	0	0	0	0	0	0	0	0	0
L11	Residential led	+/-	0	0	0	0	0	0	0	0	0
L12	Residential led	+/-	0	0	0	0	0	0	0	0	0
L2	Residential led	+/-	0	0	0	0	0	0	0	0	0
L3	Residential led	+/-	0	0	0	0	0	0	0	0	0
L7	Residential led	+/-	0	0	0	0	0	0	0	0	0
L9	Residential led	+/-	0	0	0	0	0	0	0	0	0
LW10	Residential led	+/-	0	0	0	0	0	0	0	0	0
LW2	Residential led	+/-	0	0	0	0	0	0	0	0	0
LW3	Residential led	+/-	0	0	0	0	0	0	0	0	0
LW4	Residential led	+/-	0	0	0	0	0	0	0	0	0
LW5	Residential led (C2 use)	+/-	0	0	0	0	0	0	0	0	0
LW7	Residential led	+/-	0	0	0	0	0	0	0	0	0
PP1	Residential led	+/-	0	0	0	0	0	0	0	0	0
REWW 3	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN1	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN10	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN11	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN12	Non-residential	+/-	0	0	0	0	0	0	0	0	0
RN14	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN16	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN17	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN18	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN19	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN2	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
RN22	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN23	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN24	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN25	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN26	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
RN27	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN28	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN29	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN3	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN30	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN31	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN32	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN33	Non-residential	+/-	0	0	0	0	0	0	0	0	0
RN34	Residential led	+/-	0	0	0	0	0	0	0	0	0
RN4	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
RN5	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
RSE1	Non-residential	+/-	0	0	0	0	0	0	0	0	0
RSE11	Non-residential	+/-	0	0	0	0	0	0	0	0	0
RSE4	Residential led	+/-	0	0	0	0	0	0	0	0	0
RSE8	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
RSE9	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB1	Residential led	+/-	0	0	0	0	0	-	0	0	0
RWB10	Non-residential	+/-	0	0	0	0	0	0	0	0	0
RWB11	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB12	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB14	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB15	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB17	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB18	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB19	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
RWB2	Residential led	+/-	0	0	0	0	0	-	0	0	0
RWB20	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB21	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB23	Non-residential	+/-	0	0	0	0	0	0	0	0	0
RWB25	Residential led	+/-	0	0	0	0	0	-	0	0	0
RWB3	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB4	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB5	Non-residential	+/-	0	0	0	0	0	0	0	0	0
RWB6	Residential led	+/-	0	0	0	0	0	0	0	0	0
RWB8	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
RWB9	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SMI1	Residential led	+/-	0	0	0	0	0	0	0	0	0
SMI2	Non-residential	+/-	0	0	0	0	0	0	0	0	0
SNF1	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF10	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
SNF12	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF13	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF15	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF16	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF17	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF18	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF19	Non-residential	+/-	0	0	0	0	0	0	0	0	0
SNF2	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF20	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF21	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF22	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF23	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF24	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF25	Non-residential	+/-	0	0	0	0	0	0	0	0	0
SNF26	Non-residential	+/-	0	0	0	0	0	-	0	0	0
SNF27	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF28	Non-residential	+/-	0	0	0	0	0	0	0	0	0
SNF30	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF31	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF32	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF33	Non-residential	+/-	0	0	0	0	0	0	0	0	0
SNF34	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF35	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF36	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF37	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF38	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF39	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF41	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0
SNF43	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF44	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF5	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF6	Residential led	+/-	0	0	0	0	0	0	0	0	0
SNF8	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SNF9	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
SR1	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR10	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR13	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR14	Residential led	+/-	-	0	0	0	0	0	0	0	0
SR15	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR16	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR18	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SR2	Non-residential	+/-	--	0	0	0	0	0	0	0	0
SR21	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR22	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR24	Residential led	+/-	-	0	0	0	0	0	0	0	0
SR25	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR27	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR29	Non-residential	+/-	0	0	0	0	0	0	0	0	0
SR3	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR30	Residential led (Mixed-use)	+/-	0	0	0	0	0	0	0	0	0
SR31	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0
SR32	Residential led (Mixed-use)	+/-	-	0	0	0	0	0	0	0	0
SR33	Non-residential	+/-	0	0	0	0	0	0	0	0	0
SR34	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR35	Non-residential	+/-	0	0	0	0	0	0	0	0	0
SR36	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0
SR37	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0
SR38	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0
SR39	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0
SR4	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR40	Residential led (Mixed-use)	+/-	0	0	0	0	0	-	0	0	0
SR41	Residential led (Mixed-use)	+/-	-	0	0	0	0	0	0	0	0
SR42	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR43	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR45	Non-residential	+/-	0	0	0	0	0	0	0	0	0
SR46	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR47	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR48	Residential led	+/-	0	0	0	0	0	-	0	0	0
SR49	Residential led	+/-	0	0	0	0	0	-	0	0	0
SR5	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR50	Residential led	+/-	-	0	0	0	0	-	0	0	0
SR51	Residential led (Mixed-use)	+/-	-	0	0	0	0	0	0	0	0

Site ref.	Site use	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	MCZ	Priority habitats	RIGGS	Open mosaic habitat
SR52	Residential led (Mixed-use)	+/-	-	0	0	0	0	0	0	0	0
SR6	Residential led (Mixed-use)	+/-	-	0	0	0	0	0	0	0	0
SR7	Residential led	+/-	0	0	0	0	0	0	0	0	0
SR8	Residential led	+/-	0	0	0	0	0	0	0	0	0
SW1	Residential led	+/-	0	0	0	0	0	0	0	0	0
SW2	Residential led	+/-	0	0	0	0	0	0	0	0	0
SW3	Residential led	+/-	0	0	0	0	0	0	0	0	0
SW5	Residential led	+/-	0	0	0	0	0	0	0	0	0
SW6	Residential led	+/-	0	0	0	0	0	0	0	0	0
SW7	Residential led	+/-	0	0	0	0	0	0	0	0	0
SW8	Residential led	+/-	0	0	0	0	0	0	0	0	0
T1	Non-residential	+/-	0	0	0	0	0	0	0	0	0
T2	Residential led	+/-	0	0	0	0	0	0	0	0	0
T3	Residential led	+/-	0	0	0	0	0	0	0	0	0
W1	Residential led	+/-	0	0	0	0	0	0	0	0	0
W11	Non-residential	+/-	0	0	0	0	0	0	0	0	0
W12	Residential led	+/-	0	0	0	0	0	0	0	0	0
W13	Non-residential	+/-	0	0	0	0	0	0	0	0	0
W14	Non-residential	+/-	0	0	0	0	0	0	0	0	0
W3	Residential led	+/-	0	0	0	0	0	0	0	0	0
W4	Residential led	+/-	0	0	0	0	0	0	0	0	0
W7	Residential led	+/-	0	0	0	0	0	0	0	0	0
W8	Residential led	+/-	0	0	0	0	0	0	0	0	0

I.3.5 SA Objective 4: Landscape and townscape

Table I.3.8: *Identified adverse effects and policy mitigation for SA4: Landscape*

Identified adverse impact	Potential mitigating influence of MLP policies
Threaten or result in the loss of nationally designated landscapes	Policy S6 (Kent Downs National Landscape) only allows major development within the Kent Downs National Landscape in exceptional circumstances and seeks to ensure smaller developments contribute to conserving and enhancing the character of the landscapes. Development located in proximity to the Kent Downs National Landscape will only be permitted where this considers relevant landscape appraisals and does not adversely impact views or the surrounding landscape character. Policy S4 (Landscape protection and enhancement) requires development proposals to demonstrate how they respond to key sensitivities and qualities of the surrounding landscape, including the Kent Downs National Landscape. Policy S5 (Securing strong green and blue infrastructure) encourages development proposals to reflect local character through providing multi-functional GI.

Identified adverse impact	Potential mitigating influence of MLP policies
	Policy DM4 (Noise and light pollution) requires all proposed development within the Kent Downs National Landscape to be accompanied by a Landscape and Visual impact Assessment.
Threaten or resulting in the loss of the setting or character to a country park	Policy S6 (Kent Downs National Landscape) only allows major development within the Kent Downs National Landscape in exceptional circumstances and seeks to ensure smaller developments contribute to conserving and enhancing the character of the landscapes. This includes the Ranscombe Farm Country Park which lies wholly within the Kent Downs National Landscape. In addition, development located in proximity to the Kent Downs National Landscape will only be permitted where this does not adversely impact views or the surrounding landscape character. This is likely to include the Capstone Farm Country Park, which is located in close proximity to the Kent Downs National Landscape. Policy S5 (Securing strong green and blue infrastructure) encourages development proposals to reflect local character within and surrounding country parks, through providing multi-functional GI.
Threaten or result in the loss of sensitive or locally distinctive landscapes	Policy S4 (Landscape protection and enhancement) requires development proposals to conserve and enhance Medway's local landscape character and distinctiveness, such as the North Kent Marshes. Development proposals are encouraged to be located in areas of lower landscape sensitivity and consider visual attributes of the landscape. Policy S5 (Securing strong green and blue infrastructure) encourages development proposals to reflect local character through providing multi-functional GI. Policy S7 (Green Belt) aims to maintain a strong Green Belt within Medway and would ensure that new development is only permitted within the Green Belt in exceptional circumstances. Policy DM4 (noise and light pollution) requires all development within the North Kent Marshes Special Landscape Area to provide a Landscape and Visual impact Assessment. Policy T1 (Promoting high quality design) encourages high quality place making that reflects key characteristics and sensitivities within Medway. Other policies (T2, T6, T8, T9, T10, T11, T13) ensure that development does not alter the surrounding character of the area in which it is built. Various policies such as Policies S15, S17, S18, S19, S21, S23, DM12, T18 and T19 encourage new development to be integrated within their surrounding landscapes and townscapes.
Increase urban sprawl and coalescence between settlements	Policy S4 (Landscape protection and enhancement) encourages development to retaining the intrinsic character and beauty of the countryside by containing urban sprawl and retaining the separation of settlements. Policy S7 (Green Belt) aims to manage the openness of the countryside through preserving separation between settlements and containing urban sprawl, as part of the wider Metropolitan Green Belt surrounding Greater London.

Identified adverse impact	Potential mitigating influence of MLP policies
	The Spatial Development Strategy stipulates the importance of retaining separation between urban Medway and the Hoo Peninsula through providing strategic green corridors between the urban and suburban areas. Policy T1 (Promoting high quality design) seeks to retain urban/rural distinctiveness through containing settlements to avoid coalescence.

Threaten or result in the loss of nationally designated landscapes or their setting

I.3.5.1 The policies discussed within **Table I.3.8** are expected to ensure that potential significant adverse impacts on the Kent Downs National Landscape are avoided and respond to key sensitivities to conserve and enhance its surrounding landscape character and views.

Alteration of the setting or character of a country park

I.3.5.2 The policies discussed within **Table I.3.8** are likely to reduce adverse impacts on country parks, in particular the Ranscombe Farm and the Capstone Farm Country Parks; however, these policies are not expected to fully mitigate impacts on country parks due to the lack of policy wording specific to their provision and enhancement.

Threaten or result in the loss of sensitive or locally distinctive landscapes

I.3.5.3 Although the policies discussed within **Table I.3.8** will help to reduce some adverse impacts on locally sensitive and distinctive landscapes, these policies are not expected to wholly mitigate these impacts, without further detailed landscape evaluations at the site level. There is potential for development to impact sensitive areas, which has limited scope for mitigation. Uncertainty remains in the assessment for those sites located outside of the existing published landscape study areas, where the sensitivity and capacity of the landscape for new development is unknown.

Increase urban sprawl and coalescence between settlements

I.3.5.4 Although the policies discussed within **Table I.3.8** are likely to encourage development to be located in areas which are contained from the surrounding countryside, a large number of development proposals are likely to contribute to urban sprawl and coalescence. These policies are therefore unlikely to fully mitigate the increase in urban sprawl and coalescence between settlements, as Medway's housing need is unlikely to be met without some development contributing to the encroachment of the countryside.

Table I.3.9: *Strategic sites post-mitigation impact matrix for SA Objective 4 – Landscape and townscape*

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
AS13	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
AS21	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
AS22	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
AS24	Non-residential	0	0	0	+/-	+/-	-	0	0
AS26	Non-residential	0	0	0	+/-	+/-	-	0	0

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Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
CHR4	Residential led (Mixed-use)	0	++	-	+/-	+/-	-	-	-
HHH12	Residential led (Mixed-use)	0	0	-	--	--	-	-	-
HHH22	Residential led (Mixed-use)	0	0	-	0	0	-	-	-
HHH22/HHH31	Residential led (Mixed-use)	0	0	-	0	0	-	-	-
HHH26	Residential led (Mixed-use)	0	0	-	-	-	-	-	-
HHH3	Residential led	0	0	0	+/-	+/-	-	-	-
HHH31	Residential led (Mixed-use)	0	0	-	0	0	-	-	-
HHH35	Non-residential	0	0	-	0	0	-	-	0
HHH36	Non-residential	0	0	-	0	0	-	0	-
HHH6	Residential led (Mixed-use)	0	0	-	-	-	0	-	-
HW1	Residential led	0	-	-	+/-	+/-	-	-	-
LW6	Residential led	0	-	-	+/-	+/-	-	-	-
LW8	Residential led	0	-	-	+/-	+/-	-	-	-
RN8	Residential led (Mixed-use)	0	-	-	+/-	+/-	-	-	-
RN9	Residential led	0	0	0	+/-	+/-	0	-	-
RSE10	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
SMI5	Non-residential	0	0	0	+/-	+/-	-	0	0
SMI6	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
SNF3	Residential led	0	0	-	+/-	+/-	-	-	0
SR17	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	0
SR9	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
SR53	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0

Table I.3.10: *Non-strategic sites post-mitigation impact matrix for SA Objective 4 – Landscape and townscape*

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
AS1	Residential led	0	0	-	-	-	-	-	-
AS10	Residential led	0	0	0	+/-	+/-	-	-	0
AS11	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	-	0
AS14	Residential led	0	0	-	+/-	+/-	-	-	-
AS15	Residential led	0	0	0	+/-	+/-	-	-	0
AS16	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
AS17	Residential led	0	0	-	+/-	+/-	-	-	-
AS18	Residential led	0	0	-	+/-	+/-	0	-	-
AS2	Residential led	0	0	0	0	0	-	-	0
AS20	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
AS23	Residential led (park homes)	0	0	0	+/-	+/-	0	-	0
AS25	Residential led	0	0	0	+/-	+/-	-	-	-

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
AS28	Residential led	0	0	0	+/-	+/-	-	-	0
AS29	Residential led	0	0	0	+/-	+/-	0	-	-
AS3	Residential led	0	0	-	-	-	-	-	-
AS5	Residential led (Mixed-use)	0	0	0	-	-	-	-	0
AS6	Residential led (Mixed-use)	0	0	0	-	-	-	-	0
AS7	Non-residential	0	0	0	-	-	-	0	0
AS8	Non-residential	0	0	-	+/-	+/-	-	0	-
AS9	Non-residential	0	0	-	+/-	+/-	-	-	-
CCB1	Residential led	0	0	0	+/-	+/-	0	0	0
CCB10	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB11	Residential led	0	0	0	+/-	+/-	0	0	0
CCB12	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB13	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB15	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB16	Residential led	0	0	0	+/-	+/-	0	0	0
CCB17	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB18	Residential led	0	0	0	+/-	+/-	0	0	0
CCB19	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB2	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB20	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB21	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB22	Residential led	0	0	0	+/-	+/-	0	0	0
CCB23	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB24	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB25	Residential led	0	0	0	+/-	+/-	-	0	0
CCB26	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB27	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB28	Residential led	0	0	0	+/-	+/-	0	0	0
CCB29	Residential led	0	0	0	+/-	+/-	-	-	0
CCB3	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB30	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB31	Residential led	0	0	0	+/-	+/-	0	0	0
CCB33	Residential led	0	0	0	+/-	+/-	0	0	0
CCB34	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB35	Non-residential	0	0	0	+/-	+/-	-	0	0
CCB36	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB37	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB38	Residential led	0	0	0	+/-	+/-	0	0	0
CCB39	Residential led	0	0	0	+/-	+/-	0	0	0
CCB4	Residential led	0	0	0	+/-	+/-	0	0	0
CCB40	Residential led	0	0	0	+/-	+/-	-	-	-
CCB41	Residential led	0	0	0	+/-	+/-	0	0	0
CCB43	Residential led	0	0	0	+/-	+/-	0	0	0
CCB44	Residential led	0	0	0	+/-	+/-	0	-	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
CCB46	Residential led	0	0	0	+/-	+/-	0	-	0
CCB48	Residential led	0	0	0	+/-	+/-	0	-	0
CCB49	Residential led	0	0	0	+/-	+/-	0	0	0
CCB5	Non-residential	0	0	0	+/-	+/-	-	0	0
CCB6	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
CCB7	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
CCB8	Residential led	0	0	0	+/-	+/-	0	0	0
CCB9	Residential led	0	0	0	+/-	+/-	0	0	0
CHR1	Residential led	0	0	0	+/-	+/-	0	-	0
CHR10	Residential led	0	0	0	+/-	+/-	-	-	0
CHR11	Residential led	0	0	0	+/-	+/-	0	-	0
CHR13	Residential led (Gypsy and Traveller)	0	-	-	+/-	+/-	0	-	0
CHR14	Residential led (Mixed-use)	0	-	-	+/-	+/-	-	0	0
CHR15	Non-residential	0	0	0	+/-	+/-	0	0	0
CHR16	Non-residential	0	0	0	+/-	+/-	-	0	0
CHR17	Non-residential	0	0	0	+/-	+/-	0	0	0
CHR18	Non-residential	0	0	0	+/-	+/-	-	0	0
CHR19	Non-residential	0	0	0	+/-	+/-	0	0	0
CHR2	Non-residential	0	0	-	+/-	+/-	0	-	0
CHR20	Residential led	0	0	0	+/-	+/-	-	0	0
CHR21	Non-residential	0	0	0	+/-	+/-	0	0	0
CHR3	Non-residential	0	-	-	+/-	+/-	-	-	-
CHR5	Non-residential	0	0	-	+/-	+/-	0	-	0
CHR6	Residential led	0	0	0	+/-	+/-	-	-	0
CHR7	Residential led	0	0	-	+/-	+/-	-	-	0
CHR8	Non-residential	0	0	0	+/-	+/-	0	0	0
FH1	Non-residential	0	0	0	+/-	+/-	-	0	0
FP1	Residential led	0	0	0	+/-	+/-	0	0	0
FP10	Residential led	0	0	0	+/-	+/-	0	-	0
FP11	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
FP12	Residential led	0	0	0	+/-	+/-	0	0	0
FP14	Residential led	0	0	0	+/-	+/-	0	0	0
FP16	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
FP17	Residential led	0	0	0	+/-	+/-	0	0	0
FP18	Residential led	0	0	0	+/-	+/-	-	0	0
FP19	Residential led	0	0	0	+/-	+/-	0	0	0
FP2	Residential led	0	0	0	+/-	+/-	0	0	0
FP22	Residential led	0	0	0	+/-	+/-	0	0	0
FP23	Residential led	0	0	0	+/-	+/-	0	0	0
FP25	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
FP4	Residential led	0	0	0	+/-	+/-	0	0	0
FP5	Residential led	0	0	0	+/-	+/-	0	0	0
FP6	Residential led	0	0	0	+/-	+/-	0	0	0
FP7	Residential led	0	0	0	+/-	+/-	0	0	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
FP8	Residential led	0	0	0	+/-	+/-	0	0	0
FP9	Residential led	0	0	0	+/-	+/-	0	0	0
GN10	Residential led	0	0	0	+/-	+/-	0	-	0
GN11	Residential led	0	0	0	+/-	+/-	0	0	0
GN13	Residential led	0	0	0	+/-	+/-	0	0	0
GN14	Residential led	0	0	0	+/-	+/-	-	0	0
GN15	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
GN3	Residential led	0	0	0	+/-	+/-	0	0	0
GN4	Residential led	0	0	0	+/-	+/-	0	-	0
GN5	Residential led	0	0	0	+/-	+/-	0	0	0
GN6	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
GN8	Residential led	0	0	0	+/-	+/-	0	0	0
GS1	Residential led	0	0	0	+/-	+/-	0	0	0
GS10	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS11	Residential led	0	0	0	+/-	+/-	0	0	0
GS12	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS13	Residential led	0	0	0	+/-	+/-	0	0	0
GS14	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS18	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS19	Residential led	0	0	0	+/-	+/-	0	0	0
GS2	Residential led	0	0	0	+/-	+/-	-	-	0
GS20	Residential led	0	0	0	+/-	+/-	0	0	0
GS23	Residential led	0	0	0	+/-	+/-	0	0	0
GS24	Residential led	0	0	0	+/-	+/-	0	0	0
GS26	Residential led	0	0	0	+/-	+/-	0	0	0
GS27	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS29	Residential led	0	0	0	+/-	+/-	0	0	0
GS30	Residential led	0	0	0	+/-	+/-	0	0	0
GS32	Residential led	0	0	0	+/-	+/-	0	0	0
GS33	Residential led	0	0	0	+/-	+/-	0	0	0
GS34	Residential led	0	0	0	+/-	+/-	0	0	0
GS35	Residential led	0	0	0	+/-	+/-	0	-	0
GS37	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS4	Residential led	0	0	0	+/-	+/-	0	0	0
GS5	Residential led	0	0	0	+/-	+/-	0	0	0
GS6	Residential led	0	0	0	+/-	+/-	0	0	0
GS7	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
GS8	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
HHH1	Non-residential	0	0	-	--	--	-	0	-
HHH11	Residential led	0	0	-	-	-	-	-	-
HHH14	Residential led	0	0	-	-	-	0	-	-
HHH15	Residential led	0	0	0	-	-	0	-	0
HHH16	Non-residential	0	0	-	-	-	-	-	-
HHH17	Residential led	0	0	-	-	-	-	-	-

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
HHH18	Residential led (Mixed-use)	0	0	-	--	--	-	-	-
HHH19	Non-residential	0	0	-	-	-	0	0	-
HHH21	Non-residential	0	0	0	+/-	+/-	0	0	0
HHH23	Residential led (Mixed-use)	0	0	0	-	-	-	-	-
HHH24	Residential led	0	0	-	0	0	-	0	-
HHH25	Residential led	0	0	-	0	0	-	-	-
HHH28	Residential led (Mixed-use)	0	0	-	-	-	-	-	0
HHH29	Residential led (Mixed-use)	0	0	-	-	-	-	-	-
HHH30	Residential led (Mixed-use)	0	0	0	0	0	-	0	-
HHH32	Residential led	0	0	0	--	--	-	0	-
HHH33	Residential led	0	0	-	0	0	-	-	-
HHH37	Non-residential	0	0	0	0	0	0	0	0
HHH38	Non-residential	0	0	0	0	0	0	0	0
HHH39	Non-residential	0	0	0	0	0	0	0	0
HHH4	Residential led	0	0	0	+/-	+/-	-	-	0
HHH40	Residential led	0	0	-	-	-	0	-	-
HHH41	Residential led	0	0	0	-	-	-	0	0
HHH5	Residential led	0	0	-	--	--	-	-	-
HHH7	Residential led	0	0	-	--	--	-	-	-
HHH8	Residential led (Mixed-use)	0	0	-	-	-	-	-	-
HHH9	Residential led	0	0	0	-	-	0	-	-
HW11	Residential led	0	-	0	+/-	+/-	0	-	0
HW3	Residential and secondary school	0	0	-	+/-	+/-	-	-	-
HW5	Non-residential	0	-	0	+/-	+/-	0	0	0
HW6	Residential led	0	0	-	+/-	+/-	-	-	0
HW7	Residential or non-residential	0	0	0	+/-	+/-	0	-	0
HW8	Residential led	0	0	0	+/-	+/-	0	0	0
L11	Residential led	0	0	0	+/-	+/-	-	0	0
L12	Residential led	0	0	0	+/-	+/-	0	0	0
L2	Residential led	0	0	0	+/-	+/-	0	0	0
L3	Residential led	0	0	0	+/-	+/-	0	0	0
L7	Residential led	0	0	0	+/-	+/-	0	0	0
L9	Residential led	0	0	0	+/-	+/-	0	0	0
LW10	Residential led	0	-	0	+/-	+/-	0	-	0
LW2	Residential led	0	0	0	+/-	+/-	0	-	0
LW3	Residential led	0	0	0	+/-	+/-	0	0	0
LW4	Residential led	0	-	-	+/-	+/-	-	-	-
LW5	Residential led (C2 use)	0	0	0	+/-	+/-	0	0	0
LW7	Residential led	0	-	-	+/-	+/-	-	-	-
PP1	Residential led	0	-	0	+/-	+/-	0	-	0
REWW3	Residential led	0	0	0	+/-	+/-	0	0	0
RN1	Residential led	0	-	-	+/-	+/-	-	-	-
RN10	Residential led	0	-	-	+/-	+/-	0	-	-
RN11	Residential led	0	0	0	+/-	+/-	0	-	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
RN12	Non-residential	0	0	0	+/-	+/-	0	-	0
RN14	Residential led	0	-	-	+/-	+/-	0	-	0
RN16	Residential led	0	-	0	+/-	+/-	-	-	0
RN17	Residential led	0	-	-	+/-	+/-	-	-	0
RN18	Residential led	0	0	0	+/-	+/-	0	0	0
RN19	Residential led	0	-	0	+/-	+/-	0	-	0
RN2	Residential led (Mixed-use)	0	-	-	+/-	+/-	-	-	-
RN22	Residential led	0	0	0	+/-	+/-	0	0	0
RN23	Residential led	0	-	-	+/-	+/-	0	-	-
RN24	Residential led	0	0	0	+/-	+/-	0	0	0
RN25	Residential led	0	-	0	+/-	+/-	0	-	0
RN26	Residential led (Mixed-use)	0	-	-	+/-	+/-	-	-	-
RN27	Residential led	0	-	-	+/-	+/-	-	-	-
RN28	Residential led	0	0	0	+/-	+/-	0	-	0
RN29	Residential led	0	0	0	+/-	+/-	0	0	0
RN3	Residential led	0	0	0	+/-	+/-	0	0	0
RN30	Residential led	0	0	-	+/-	+/-	0	-	0
RN31	Residential led	0	0	-	+/-	+/-	0	-	0
RN32	Residential led	0	0	-	+/-	+/-	0	-	0
RN33	Non-residential	0	0	-	+/-	+/-	0	-	0
RN34	Residential led	0	-	0	+/-	+/-	0	-	0
RN4	Residential led (Mixed-use)	0	-	-	+/-	+/-	-	-	-
RN5	Residential led (Mixed-use)	0	-	-	+/-	+/-	0	-	-
RSE1	Non-residential	0	0	0	+/-	+/-	0	0	0
RSE11	Non-residential	0	0	0	+/-	+/-	0	-	0
RSE4	Residential led	0	0	0	+/-	+/-	0	-	0
RSE8	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	0	0
RSE9	Residential led	0	0	-	+/-	+/-	0	0	0
RWB1	Residential led	0	0	0	+/-	+/-	-	-	0
RWB10	Non-residential	0	0	0	+/-	+/-	0	0	0
RWB11	Residential led	0	0	0	+/-	+/-	0	0	0
RWB12	Residential led	0	0	0	+/-	+/-	0	0	0
RWB14	Residential led	0	0	0	+/-	+/-	0	0	0
RWB15	Residential led	0	0	0	+/-	+/-	0	0	0
RWB17	Residential led	0	0	0	+/-	+/-	0	0	0
RWB18	Residential led	0	0	0	+/-	+/-	0	0	0
RWB19	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
RWB2	Residential led	0	0	0	+/-	+/-	-	0	0
RWB20	Residential led	0	0	0	+/-	+/-	0	0	0
RWB21	Residential led	0	0	0	+/-	+/-	0	0	0
RWB23	Non-residential	0	0	0	+/-	+/-	0	0	0
RWB25	Residential led	0	0	0	+/-	+/-	-	0	0
RWB3	Residential led	0	0	0	+/-	+/-	-	0	0
RWB4	Residential led	0	0	0	+/-	+/-	-	-	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
RWB5	Non-residential	0	0	-	+/-	+/-	-	0	0
RWB6	Residential led	0	0	0	+/-	+/-	0	-	0
RWB8	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
RWB9	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SMI1	Residential led	0	0	0	+/-	+/-	-	0	0
SMI2	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF1	Residential led	0	0	0	+/-	+/-	-	-	0
SNF10	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF12	Residential led	0	0	0	+/-	+/-	0	0	0
SNF13	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF15	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF16	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF17	Residential led	0	0	0	+/-	+/-	0	0	0
SNF18	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF19	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF2	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	-	0
SNF20	Residential led	0	0	0	+/-	+/-	0	0	0
SNF21	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
SNF22	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	0	0
SNF23	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF24	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF25	Non-residential	0	0	0	+/-	+/-	-	0	0
SNF26	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF27	Residential led	0	0	0	+/-	+/-	0	0	0
SNF28	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF30	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF31	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF32	Residential led	0	0	0	+/-	+/-	0	0	0
SNF33	Non-residential	0	0	0	+/-	+/-	0	0	0
SNF34	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF35	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF36	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF37	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SNF38	Residential led	0	0	0	+/-	+/-	0	-	0
SNF39	Residential led	0	0	0	+/-	+/-	0	0	0
SNF41	Residential led (Mixed-use)	0	0	0	+/-	+/-	-	-	0
SNF43	Residential led	0	0	0	+/-	+/-	-	-	-
SNF44	Residential led	0	0	0	+/-	+/-	0	0	0
SNF5	Residential led	0	0	0	+/-	+/-	0	-	0
SNF6	Residential led	0	0	0	+/-	+/-	0	0	0
SNF8	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	-	0
SNF9	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	-	0
SR1	Residential led	0	0	0	+/-	+/-	0	-	0
SR10	Residential led	0	0	0	+/-	+/-	0	-	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
SR13	Residential led	0	0	0	+/-	+/-	-	-	0
SR14	Residential led	0	0	-	+/-	+/-	0	-	0
SR15	Residential led	0	0	-	+/-	+/-	-	-	0
SR16	Residential led	0	0	-	+/-	+/-	-	-	0
SR18	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	0
SR2	Non-residential	0	0	-	+/-	+/-	-	-	0
SR21	Residential led	0	0	-	+/-	+/-	-	-	-
SR22	Residential led	0	0	-	+/-	+/-	0	-	0
SR24	Residential led	0	0	0	+/-	+/-	-	-	0
SR25	Residential led	0	0	-	--	--	-	-	-
SR27	Residential led	0	0	-	--	--	-	0	0
SR29	Non-residential	0	0	0	+/-	+/-	0	0	0
SR3	Residential led	0	0	-	+/-	+/-	0	-	0
SR30	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR31	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR32	Residential led (Mixed-use)	0	0	-	--	--	-	-	-
SR33	Non-residential	0	0	0	+/-	+/-	0	0	0
SR34	Residential led	0	0	0	+/-	+/-	0	0	0
SR35	Non-residential	0	0	0	+/-	+/-	0	0	0
SR36	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR37	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR38	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR39	Residential led (Mixed-use)	0	0	-	--	--	-	0	-
SR4	Residential led	0	0	-	+/-	+/-	0	0	-
SR40	Residential led (Mixed-use)	0	0	0	+/-	+/-	0	0	0
SR41	Residential led (Mixed-use)	0	0	-	--	--	0	-	-
SR42	Residential led	0	0	-	+/-	+/-	-	-	-
SR43	Residential led	0	0	-	+/-	+/-	0	-	-
SR45	Non-residential	0	0	0	+/-	+/-	-	-	0
SR46	Residential led	0	0	0	+/-	+/-	-	-	-
SR47	Residential led	0	0	0	+/-	+/-	-	-	0
SR48	Residential led	0	0	0	+/-	+/-	-	-	0
SR49	Residential led	0	0	0	+/-	+/-	-	-	0
SR5	Residential led	0	0	-	+/-	+/-	-	-	0
SR50	Residential led	0	0	0	+/-	+/-	-	0	0
SR51	Residential led (Mixed-use)	0	0	-	+/-	+/-	0	-	-
SR52	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
SR6	Residential led (Mixed-use)	0	0	-	+/-	+/-	-	-	-
SR7	Residential led	0	0	-	+/-	+/-	-	-	0
SR8	Residential led	0	0	-	+/-	+/-	-	-	0
SW1	Residential led	0	0	0	+/-	+/-	0	0	0
SW2	Residential led	0	0	0	+/-	+/-	0	0	0
SW3	Residential led	0	0	0	+/-	+/-	0	0	0
SW5	Residential led	0	0	0	+/-	+/-	0	0	0

Site ref.	Site use	Kent Downs National Landscape	Country Park	Landscape Character Assessment	Landscape Sensitivity	Landscape Capacity	Views from the PRoW network	Views experienced by local residents	Coalescence / urban sprawl
SW6	Residential led	0	0	0	+/-	+/-	0	0	0
SW7	Residential led	0	0	0	+/-	+/-	0	0	0
SW8	Residential led	0	0	0	+/-	+/-	0	0	0
T1	Non-residential	0	0	0	+/-	+/-	0	-	0
T2	Residential led	0	0	0	+/-	+/-	0	-	0
T3	Residential led	0	0	0	+/-	+/-	0	-	0
W1	Residential led	0	0	0	+/-	+/-	0	0	0
W11	Non-residential	0	0	0	+/-	+/-	-	-	-
W12	Residential led	0	0	0	+/-	+/-	0	0	0
W13	Non-residential	0	0	0	+/-	+/-	0	0	0
W14	Non-residential	0	0	0	+/-	+/-	0	0	0
W3	Residential led	0	0	0	+/-	+/-	0	0	0
W4	Residential led	0	0	0	+/-	+/-	0	0	0
W7	Residential led	0	0	0	+/-	+/-	0	0	0
W8	Residential led	0	0	0	+/-	+/-	0	-	0

I.3.6 SA Objective 5: Pollution and waste

Table I.3.11: *Identified adverse effects and policy mitigation for SA5: Pollution and waste*

Identified adverse impact	Potential mitigating influence of MLP policies
Increase in, and exposure to, air pollution and noise (from AQMA, main roads or railway)	Policy DM3 (Air quality) addresses air quality issues across Medway and promotes appropriate design to improve emissions, such as through the installation of electric charging points and introducing low Nitrous Oxide (NO_2) boilers. Development which is expected to negatively impact air quality will be expected to provide an air pollution impact assessment with mitigation measures, including development located in proximity to an AQMA or a biodiversity designation. The Spatial Development Strategy, Policy T26 (Accessibility standards) and Policy DM20 (Cycle parking and storage) aim to reduce reliance on cars and the need to travel through facilitating sustainable and active modes of transport. Policy S25 (Energy Supply) and Policy T41 (Heat Networks) support low carbon energy provision for new developments. Policy S5 (Securing strong green and blue infrastructure), Policy T27 (Reducing health inequalities and promoting health and wellbeing), and Policy DM6 (Sustainable design and construction) all support provision of infrastructure that reduces air pollution levels.
Risk of contamination of	Policy DM1 (Flood and water management) proposes that all new development should integrate the requirements of the Thames River Basin District Management Plan[3] to

[3] Environment Agency (2022). Thames River Basin District Management Plan. Available at: www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022 [Date accessed: 13/05/24]

Identified adverse impact	Potential mitigating influence of MLP policies
groundwater Source Protection Zones	improve water quality, including undertaking risk assessments to mitigate impacts on groundwater. Development within a groundwater SPZ will only be permitted providing it has no impact on the groundwater resource. Additionally, Policy DM1 and Policy S5 (Securing strong green and blue infrastructure) encourage the preparation of Surface Water Drainage Strategies including the implementation of Sustainable Urban Drainage (SuDs) to provide benefits for water quality. Policy DM2 (Contaminated land) stipulates that any development located in proximity to contaminated land will identify and mitigate potential risks to human health and the environment.
Risk of contamination of watercourses	Policy DM1 (Flood and water management) ensures that adequate wastewater infrastructure is provided to meet the needs of development proposals, lessening the risk of contamination to nearby watercourses. Policy DM2 (Contaminated land) stipulates that any development located in proximity to contaminated land will identify and mitigate potential risks the environment, including exposure to water supplies. Policy T40 (Wastewater treatment) promotes effective wastewater disposal in line with regulatory provisions. Policy T7 (Houseboats) ensures there is adequate provision for foul water disposal and disposal of disused vessels, to minimise watercourse contamination from houseboats.
Increase in waste generation	Policies T34 (Safeguarding of existing waste management facilities), T35 (Provision of additional waste management capacity) safeguard current waste infrastructure and increase its capacity for waste management. Policy DM23 (Waste prevention) encourages design principles that minimise waste and locally produced and recycled resources. Policy T37 (Other recovery) supports the provision of energy from waste facilities where waste cannot be reused or recycled. Policy T8 (Houses of multiple occupation) supports favourable consideration for development that makes appropriate provision for waste storage.

Increase in, and exposure to, air pollution and noise

I.3.6.1 The policies discussed within **Table I.3.11** will contribute to minimising adverse impacts associated with the exposure of site end users to poor air quality within or adjacent to AQMAs, and impacts associated with reduced air and noise quality alongside main roads or railway lines. However, these policies are not expected to fully mitigate the adverse impacts on air pollution associated with the large scale of proposed development across the Plan area, in particular from employment sites.

Risk of contamination of groundwater Source Protection Zones

I.3.6.2 The policies discussed within **Table I.3.11** are expected to mitigate potential adverse impacts on the quality of groundwater SPZs as result of the proposed development.

Risk of contamination of watercourses

I.3.6.3 The policies discussed within **Table I.3.11** may lessen adverse impacts on water quality to some extent; however, they are not expected to fully mitigate impacts or resolve

uncertainty associated with run-off and drainage from new developments, in particular with the presence of the River Medway and its tributaries.

Increase in waste generation

I.3.6.4 The policies discussed within **Table I.3.11** will help to encourage recycling and appropriate waste disposal within new developments. The MLP policies have been prepared in line with the findings of the Waste Needs Assessment[4], indicating how household waste (and other types of waste) are to be managed, and including targets to minimise waste to landfill over the Plan period. In line with the MLP policies, there is likely to be a negligible impact overall in terms of individual residential-led developments on waste. However, the impact of non-residential or mixed-use developments remains uncertain given the unknown type and quantity of waste to be produced.

Table I.3.12: *Strategic sites post-mitigation impact matrix table for SA Objective 5 – Pollution and waste*

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
AS13	Residential led (Mixed-use)	0	-	0	-	0	-	+/-
AS21	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
AS22	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
AS24	Non-residential	0	0	-	-	0	-	+/-
AS26	Non-residential	0	0	0	-	0	-	+/-
CHR4	Residential led (Mixed-use)	0	-	-	+/-	-	-	+/-
HHH12	Residential led (Mixed-use)	-	0	0	-	0	-	+/-
HHH22	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
HHH22/ HHH31	Residential led (Mixed-use)	0	-	-	-	0	-	+/-
HHH26	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
HHH3	Residential led	0	0	0	+/-	0	-	+/-
HHH31	Residential led (Mixed-use)	0	-	-	-	0	-	+/-
HHH35	Non-residential	0	0	-	-	0	-	+/-
HHH36	Non-residential	0	0	0	+/-	0	-	+/-
HHH6	Residential led (Mixed-use)	0	-	0	-	0	-	+/-
HW1	Residential led	0	0	0	+/-	-	-	0
LW6	Residential led	0	0	0	+/-	-	-	0
LW8	Residential led	0	0	0	+/-	-	-	0
RN8	Residential led (Mixed-use)	0	0	-	+/-	0	-	+/-
RN9	Residential led (Mixed-use)	0	0	-	+/-	0	-	+/-
RSE10	Residential led (Mixed-use)	+	-	0	+/-	0	-	+/-

[4] BPP Consulting (2024) Medway Local Plan – Waste Evidence Base. Medway Waste Needs Assessment Update. Available at: https://medway.oc2.uk/document/20 [Date accessed: 13/06/25]

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
SMI5	Non-residential	-	-	0	-	0	-	+/-
SMI6	Residential led (Mixed-use)	-	-	0	-	0	-	+/-
SNF3	Residential led	0	-	-	+/-	-	-	0
SR17	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
SR9	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
SR53	Residential led (Mixed-use opportunity area)	0	-	0	-	0	-	+/-

Table I.3.13: *Non-strategic sites post-mitigation impact matrix for SA Objective 5 – Pollution and waste*

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
AS1	Residential led	0	-	0	+/-	0	-	0
AS10	Residential led	0	-	0	+/-	0	0	0
AS11	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
AS14	Residential led	0	-	0	+/-	0	-	0
AS15	Residential led	0	-	0	+/-	0	-	0
AS16	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
AS17	Residential led	0	-	-	+/-	0	-	0
AS18	Residential led	0	0	0	+/-	0	-	0
AS2	Residential led	0	-	0	+/-	0	0	0
AS20	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
AS23	Residential led (park homes)	0	0	0	+/-	0	+/-	0
AS25	Residential led	0	-	0	+/-	0	-	0
AS28	Residential led	0	0	0	+/-	0	-	0
AS29	Residential led	0	0	0	+/-	0	0	0
AS3	Residential led	0	-	0	+/-	0	-	0
AS5	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
AS6	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
AS7	Non-residential	0	-	0	+/-	0	-	+/-
AS8	Non-residential	0	-	0	+/-	0	-	+/-
AS9	Non-residential	0	-	0	-	0	-	+/-
CCB1	Residential led	-	-	-	+/-	0	-	0
CCB10	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB11	Residential led	-	-	0	+/-	0	-	0
CCB12	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB13	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB15	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB16	Residential led	0	-	0	+/-	0	-	0

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
CCB17	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB18	Residential led	0	-	0	+/-	0	-	0
CCB19	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB2	Residential led (Mixed-use)	-	-	-	+/-	0	0	+/-
CCB20	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB21	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB22	Residential led	-	-	0	+/-	0	-	0
CCB23	Residential led (Mixed-use)	-	-	0	+/-	0	0	+/-
CCB24	Residential led (Mixed-use)	-	-	0	+/-	0	0	+/-
CCB25	Residential led	0	-	0	-	0	-	0
CCB26	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB27	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB28	Residential led	-	-	-	+/-	0	-	0
CCB29	Residential led	0	-	0	+/-	0	0	0
CCB3	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB30	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB31	Residential led	-	-	0	+/-	0	-	0
CCB33	Residential led	0	-	0	+/-	0	0	0
CCB34	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
CCB35	Non-residential	0	0	0	+/-	0	-	+/-
CCB36	Residential led (Mixed-use)	-	-	-	+/-	0	0	+/-
CCB37	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB38	Residential led	-	-	-	+/-	0	0	0
CCB39	Residential led	-	-	-	+/-	0	-	0
CCB4	Residential led	-	-	-	+/-	0	-	0
CCB40	Residential led	0	-	0	+/-	0	0	0
CCB41	Residential led	-	-	-	+/-	0	0	0
CCB43	Residential led	0	-	0	+/-	0	-	0
CCB44	Residential led	-	-	-	+/-	0	0	0
CCB46	Residential led	-	-	-	+/-	0	0	0
CCB48	Residential led	0	-	0	+/-	0	-	0
CCB49	Residential led	-	-	-	+/-	0	-	0
CCB5	Non-residential	-	-	0	-	0	-	+/-
CCB6	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
CCB7	Residential led (Mixed-use)	-	-	0	+/-	0	0	+/-
CCB8	Residential led	-	-	0	+/-	0	-	0
CCB9	Residential led	-	-	-	+/-	0	-	0
CHR1	Residential led	0	0	0	+/-	0	-	0

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
CHR10	Residential led	0	-	-	+/-	0	0	0
CHR11	Residential led	0	-	-	+/-	0	0	0
CHR13	Residential led (Gypsy and Traveller)	0	-	-	+/-	0	-	0
CHR14	Residential led (Mixed-use)	0	-	-	-	0	-	+/-
CHR15	Non-residential	0	-	-	+/-	0	-	+/-
CHR16	Non-residential	0	-	-	+/-	0	-	+/-
CHR17	Non-residential	0	-	-	+/-	0	-	+/-
CHR18	Non-residential	0	-	-	+/-	0	-	+/-
CHR19	Non-residential	-	-	-	+/-	0	-	+/-
CHR2	Non-residential	0	0	0	+/-	0	-	+/-
CHR20	Residential led	0	0	-	+/-	0	-	0
CHR21	Non-residential	-	-	-	+/-	0	-	+/-
CHR3	Non-residential	0	0	-	+/-	0	-	+/-
CHR5	Non-residential	0	-	0	+/-	0	-	+/-
CHR6	Residential led	0	-	-	+/-	0	-	0
CHR7	Residential led	0	-	-	+/-	0	-	0
CHR8	Non-residential	0	-	-	+/-	0	-	+/-
FH1	Non-residential	0	-	0	+/-	0	-	+/-
FP1	Residential led	-	-	-	+/-	0	-	0
FP10	Residential led	0	0	0	+/-	0	-	0
FP11	Residential led (Mixed-use)	-	-	-	-	0	-	+/-
FP12	Residential led	-	-	-	+/-	0	-	0
FP14	Residential led	-	-	0	+/-	0	0	0
FP16	Residential led (Mixed-use)	-	-	0	+/-	0	0	+/-
FP17	Residential led	-	-	-	+/-	0	0	0
FP18	Residential led	-	0	0	-	0	-	0
FP19	Residential led	-	-	-	+/-	0	-	0
FP2	Residential led	-	-	-	+/-	0	0	0
FP22	Residential led	0	-	0	+/-	0	-	0
FP23	Residential led	-	-	0	+/-	0	-	0
FP25	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
FP4	Residential led	-	-	-	+/-	0	0	0
FP5	Residential led	-	-	-	-	0	-	0
FP6	Residential led	-	-	-	+/-	0	-	0
FP7	Residential led	-	-	-	-	0	-	0
FP8	Residential led	0	0	0	+/-	0	-	0
FP9	Residential led	-	-	-	-	0	-	0
GN10	Residential led	0	-	0	+/-	0	0	0
GN11	Residential led	0	0	-	+/-	0	0	0

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
GN13	Residential led	0	-	0	+/-	0	-	0
GN14	Residential led	-	-	0	+/-	0	-	0
GN15	Residential led (Mixed-use)	-	-	0	-	0	-	+/-
GN3	Residential led	-	-	0	+/-	0	-	0
GN4	Residential led	-	-	0	+/-	0	0	0
GN5	Residential led	0	0	-	+/-	0	0	0
GN6	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
GN8	Residential led	0	0	0	+/-	0	-	0
GS1	Residential led	0	-	0	+/-	0	-	0
GS10	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
GS11	Residential led	0	0	-	+/-	0	0	0
GS12	Residential led (Mixed-use)	0	-	-	+/-	0	0	+/-
GS13	Residential led	0	-	-	+/-	0	-	0
GS14	Residential led (Mixed-use)	0	-	-	+/-	0	0	+/-
GS18	Residential led (Mixed-use)	0	-	-	+/-	0	-	+/-
GS19	Residential led	0	-	-	+/-	0	-	0
GS2	Residential led	-	-	-	+/-	0	-	0
GS20	Residential led	0	0	0	+/-	0	0	0
GS23	Residential led	0	0	0	+/-	0	0	0
GS24	Residential led	0	-	-	+/-	0	-	0
GS26	Residential led	0	-	-	+/-	0	-	0
GS27	Residential led (Mixed-use)	0	-	-	+/-	0	0	+/-
GS29	Residential led	0	-	-	+/-	0	-	0
GS30	Residential led	0	-	-	+/-	0	0	0
GS32	Residential led	0	-	0	+/-	0	0	0
GS33	Residential led	-	-	0	+/-	0	-	0
GS34	Residential led	0	-	0	+/-	0	0	0
GS35	Residential led	-	-	0	+/-	0	-	0
GS37	Residential led (Mixed-use)	0	-	-	+/-	0	-	+/-
GS4	Residential led	0	-	0	+/-	0	-	0
GS5	Residential led	0	-	0	+/-	0	0	0
GS6	Residential led	0	0	-	+/-	0	0	0
GS7	Residential led (Mixed-use)	0	-	-	+/-	0	-	+/-
GS8	Residential led (Mixed-use)	0	-	0	+/-	0	0	+/-
HHH1	Non-residential	0	0	0	+/-	0	-	+/-
HHH11	Residential led	0	-	0	+/-	0	-	0
HHH14	Residential led	0	-	0	+/-	0	-	0
HHH15	Residential led	0	0	-	+/-	0	0	0
HHH16	Non-residential	0	-	0	+/-	0	-	+/-
HHH17	Residential led	0	-	0	+/-	0	-	0
HHH18	Residential led (Mixed-use)	0	0	-	-	0	+/-	+/-

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
HHH19	Non-residential	0	-	0	-	0	-	+/-
HHH21	Non-residential	0	0	0	+/-	0	-	+/-
HHH23	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
HHH24	Residential led	0	0	0	+/-	0	-	0
HHH25	Residential led	0	0	0	+/-	0	-	0
HHH28	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
HHH29	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
HHH30	Residential led (Mixed-use)	0	0	-	-	0	-	+/-
HHH32	Residential led	0	0	0	+/-	0	0	0
HHH33	Residential led	0	0	0	+/-	0	-	0
HHH37	Non-residential	0	0	-	+/-	0	-	+/-
HHH38	Non-residential	0	0	0	-	0	-	+/-
HHH39	Non-residential	0	0	-	+/-	0	-	+/-
HHH4	Residential led	0	0	0	+/-	0	0	0
HHH40	Residential led	0	0	0	+/-	0	-	0
HHH41	Residential led	0	-	0	+/-	0	-	0
HHH5	Residential led	-	-	0	+/-	0	-	0
HHH7	Residential led	0	-	0	-	0	-	0
HHH8	Residential led (Mixed-use)	-	-	0	-	0	-	+/-
HHH9	Residential led	0	0	0	-	0	0	0
HW11	Residential led	0	0	0	+/-	0	-	0
HW3	Residential and secondary school	0	0	0	+/-	0	-	+/-
HW5	Non-residential	0	-	0	+/-	0	-	+/-
HW6	Residential led	0	-	0	+/-	0	-	0
HW7	Residential or non-residential	0	-	0	+/-	0	+/-	+/-
HW8	Residential led	0	0	0	+/-	0	0	0
L11	Residential led	-	-	0	+/-	0	0	0
L12	Residential led	-	-	0	+/-	0	-	0
L2	Residential led	0	0	0	+/-	0	0	0
L3	Residential led	-	0	0	+/-	0	0	0
L7	Residential led	-	0	0	+/-	0	0	0
L9	Residential led	-	0	0	+/-	0	-	0
LW10	Residential led	0	0	0	+/-	0	0	0
LW2	Residential led	0	0	0	+/-	0	-	0
LW3	Residential led	0	0	0	+/-	0	-	0
LW4	Residential led	0	0	0	+/-	0	-	0
LW5	Residential led (C2 use)	0	0	0	+/-	0	+/-	0
LW7	Residential led	0	0	0	+/-	0	-	0
PP1	Residential led	0	0	0	+/-	0	-	0

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
REWW 3	Residential led	0	-	0	+/-	0	-	0
RN1	Residential led	0	-	0	+/-	0	-	0
RN10	Residential led	0	0	0	+/-	0	-	0
RN11	Residential led	0	0	-	+/-	0	-	0
RN12	Non-residential	0	0	0	+/-	0	-	+/-
RN14	Residential led	0	0	0	+/-	0	-	0
RN16	Residential led	0	0	0	+/-	0	-	0
RN17	Residential led	0	0	0	+/-	0	-	0
RN18	Residential led	0	0	-	+/-	0	0	0
RN19	Residential led	0	0	0	+/-	0	0	0
RN2	Residential led (Mixed-use)	0	-	-	+/-	0	-	+/-
RN22	Residential led	0	0	0	+/-	0	0	0
RN23	Residential led	0	0	0	+/-	0	-	0
RN24	Residential led	-	-	-	+/-	0	0	0
RN25	Residential led	0	0	0	+/-	0	0	0
RN26	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
RN27	Residential led	0	0	0	+/-	0	-	0
RN28	Residential led	0	-	-	+/-	0	-	0
RN29	Residential led	0	0	0	+/-	0	-	0
RN3	Residential led	0	-	0	+/-	0	0	0
RN30	Residential led	0	0	-	+/-	0	-	0
RN31	Residential led	0	0	0	+/-	0	-	0
RN32	Residential led	0	-	-	+/-	0	-	0
RN33	Non-residential	0	0	0	+/-	0	-	+/-
RN34	Residential led	0	-	0	+/-	0	-	0
RN4	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
RN5	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
RSE1	Non-residential	0	0	0	+/-	0	-	+/-
RSE11	Non-residential	0	-	0	+/-	0	-	+/-
RSE4	Residential led	0	-	0	+/-	0	0	0
RSE8	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
RSE9	Residential led	0	0	0	+/-	0	-	0
RWB1	Residential led	0	-	-	-	0	-	0
RWB10	Non-residential	-	-	-	+/-	0	-	+/-
RWB11	Residential led	-	-	-	+/-	0	0	0
RWB12	Residential led	-	-	0	+/-	0	0	0
RWB14	Residential led	-	-	-	+/-	0	-	0
RWB15	Residential led	-	-	-	+/-	0	-	0
RWB17	Residential led	-	-	-	+/-	0	0	0
RWB18	Residential led	-	-	-	+/-	0	0	0
RWB19	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
RWB2	Residential led	0	0	0	+/-	0	-	0

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
RWB20	Residential led	-	-	-	+/-	0	-	0
RWB21	Residential led	-	-	-	+/-	0	-	0
RWB23	Non-residential	-	-	-	+/-	0	-	+/-
RWB25	Residential led	0	0	0	-	0	-	0
RWB3	Residential led	0	0	0	+/-	0	0	0
RWB4	Residential led	0	0	0	+/-	0	0	0
RWB5	Non-residential	0	-	0	+/-	0	-	+/-
RWB6	Residential led	0	0	0	+/-	0	0	0
RWB8	Residential led (Mixed-use)	-	-	-	+/-	0	0	+/-
RWB9	Residential led (Mixed-use)	-	-	-	+/-	0	0	+/-
SMI1	Residential led	0	-	0	+/-	0	-	0
SMI2	Non-residential	0	-	0	+/-	0	-	+/-
SNF1	Residential led	0	-	0	+/-	0	-	0
SNF10	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF12	Residential led	0	0	0	+/-	0	0	0
SNF13	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF15	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF16	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF17	Residential led	-	-	-	+/-	0	0	0
SNF18	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF19	Non-residential	-	-	-	+/-	0	-	+/-
SNF2	Residential led (Mixed-use)	0	-	0	+/-	0	-	+/-
SNF20	Residential led	-	-	-	+/-	0	-	0
SNF21	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF22	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF23	Residential led (Mixed-use)	-	-	-	+/-	0	0	+/-
SNF24	Residential led (Mixed-use)	-	-	-	+/-	0	0	+/-
SNF25	Non-residential	-	-	-	+/-	0	-	+/-
SNF26	Non-residential	0	-	-	-	0	-	+/-
SNF27	Residential led	-	-	-	+/-	0	-	0
SNF28	Non-residential	-	-	-	+/-	0	-	+/-
SNF30	Residential led (Mixed-use)	-	-	-	+/-	0	0	+/-
SNF31	Residential led (Mixed-use)	-	-	-	+/-	0	0	+/-
SNF32	Residential led	-	-	-	+/-	0	0	0
SNF33	Non-residential	-	-	-	+/-	0	-	+/-

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
SNF34	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF35	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF36	Residential led (Mixed-use)	-	-	-	+/-	0	0	+/-
SNF37	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF38	Residential led	-	-	-	+/-	0	-	0
SNF39	Residential led	-	-	-	+/-	0	-	0
SNF41	Residential led (Mixed-use)	-	0	-	-	0	-	+/-
SNF43	Residential led	0	0	-	+/-	0	-	0
SNF44	Residential led	-	-	0	+/-	0	0	0
SNF5	Residential led	0	-	0	+/-	0	0	0
SNF6	Residential led	0	-	0	+/-	0	0	0
SNF8	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SNF9	Residential led (Mixed-use)	-	-	-	+/-	0	-	+/-
SR1	Residential led	0	-	-	+/-	0	-	0
SR10	Residential led	0	-	-	+/-	0	-	0
SR13	Residential led	0	-	0	+/-	0	-	0
SR14	Residential led	0	0	0	+/-	0	-	0
SR15	Residential led	0	-	0	+/-	0	-	0
SR16	Residential led	0	0	0	+/-	0	-	0
SR18	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
SR2	Non-residential	0	0	0	+/-	0	-	+/-
SR21	Residential led	0	0	0	+/-	0	-	0
SR22	Residential led	0	0	0	+/-	0	0	0
SR24	Residential led	0	0	0	+/-	0	-	0
SR25	Residential led	-	-	0	+/-	0	-	0
SR27	Residential led	0	-	0	+/-	0	-	0
SR29	Non-residential	0	0	0	+/-	0	-	+/-
SR3	Residential led	0	0	0	+/-	0	0	0
SR30	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
SR31	Residential led (Mixed-use)	0	0	0	-	0	-	+/-
SR32	Residential led (Mixed-use)	0	0	0	-	0	-	+/-
SR33	Non-residential	0	0	0	+/-	0	-	+/-
SR34	Residential led	0	0	0	+/-	0	-	0
SR35	Non-residential	0	0	0	-	0	-	+/-
SR36	Residential led (Mixed-use)	0	0	0	-	0	-	+/-
SR37	Residential led (Mixed-use)	0	0	0	-	0	-	+/-
SR38	Residential led (Mixed-use)	0	0	0	-	0	-	+/-
SR39	Residential led (Mixed-use)	0	-	0	-	0	-	+/-

Site ref.	Site use	AQMA	Main road	Railway line	Watercourse	SPZ	Air pollution	Waste
SR4	Residential led	0	0	0	+/-	0	-	0
SR40	Residential led (Mixed-use)	0	0	0	-	0	-	+/-
SR41	Residential led (Mixed-use)	-	-	0	+/-	0	-	+/-
SR42	Residential led	0	0	0	+/-	0	-	0
SR43	Residential led	0	0	0	+/-	0	-	0
SR45	Non-residential	0	0	0	+/-	0	-	+/-
SR46	Residential led	0	0	0	+/-	0	-	0
SR47	Residential led	0	0	0	+/-	0	0	0
SR48	Residential led	0	0	0	-	0	0	0
SR49	Residential led	0	0	0	-	0	0	0
SR5	Residential led	0	-	-	+/-	0	-	0
SR50	Residential led	0	0	0	-	0	0	0
SR51	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
SR52	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
SR6	Residential led (Mixed-use)	0	0	0	+/-	0	-	+/-
SR7	Residential led	0	0	0	+/-	0	-	0
SR8	Residential led	0	0	0	+/-	0	-	0
SW1	Residential led	0	0	0	+/-	0	-	0
SW2	Residential led	0	0	0	+/-	0	-	0
SW3	Residential led	0	0	0	+/-	0	0	0
SW5	Residential led	0	0	0	+/-	0	0	0
SW6	Residential led	0	0	0	+/-	0	0	0
SW7	Residential led	0	0	0	+/-	0	0	0
SW8	Residential led	-	-	-	+/-	0	0	0
T1	Non-residential	0	-	0	+/-	0	-	+/-
T2	Residential led	0	0	-	+/-	0	0	0
T3	Residential led	0	0	0	+/-	0	-	0
W1	Residential led	0	0	0	+/-	0	0	0
W11	Non-residential	0	-	-	+/-	0	-	+/-
W12	Residential led	0	0	0	+/-	0	-	0
W13	Non-residential	0	-	0	+/-	0	-	+/-
W14	Non-residential	0	-	0	+/-	0	0	+/-
W3	Residential led	-	-	0	+/-	0	-	0
W4	Residential led	0	0	0	+/-	0	0	0
W7	Residential led	0	0	0	+/-	0	-	0
W8	Residential led	0	0	0	+/-	0	0	0

I.3.7 SA Objective 6: Natural resources

Table I.3.14: Identified adverse effects and policy mitigation for SA6: Natural resources

Identified adverse impact	Potential mitigating influence of MLP policies
Loss of previously undeveloped land or land with environmental value	The Spatial Development Strategy encourages development proposals to make use of previously developed land and invest in urban areas. Policy S2 (Conservation and enhancement of the natural environment) encourages development to be located away from biodiversity designations, restoring and enhancing biodiversity across the Plan area. Policy S4 (Landscape protection and enhancement) aims to contain urban sprawl and therefore limit development on greenfield land. Policy S5 (Securing strong green and blue infrastructure) will help to conserve and enhance the GI network in the borough. Policy S7 (Green Belt) supports the provision of a strong green belt, promoting development away from the countryside and within the urban area. Policy T28 (Existing open space, outdoor sports and play spaces) and Policy DM21 (New open space, outdoor sports and play spaces) encourages adequate open space provision, including the replacement of open space that may be lost to development.
Loss of land containing Best and Most Versatile (BMV) land	The Spatial Development Strategy encourages development proposals to make use of previously developed land, locating development away from greenfield land with high value soil. Policy S4 (Landscape protection and enhancement) aims to provide local nature recovery networks and improve habitat connectivity, consequently areas of BMV soil. Policy S5 (Securing strong green and blue infrastructure) will help to conserve and enhance the GI network in the borough, including BMV soil. Policy T10 (Gypsy, Travellers and Travelling Showpeople) will permit new sites that are not located within BMV soils of Grades 1, 2, or 3a. Policy T14 (Rural economy) would support employment development in the countryside that does not lead to significant loss of high-grade agricultural land and can demonstrate that locations of lower agricultural land value are not suitable.
Loss of Mineral Safeguarding Area (MSA)	Policy T30 (Safeguarding mineral resources) only grants planning permission that would not intervene with current or potential extraction of valuable mineral resources. Policy T31 (Safeguarding of existing mineral supply infrastructure) safeguards existing mineral supply infrastructure from development that may limit their operation.

Loss of previously undeveloped land or land with environmental value

I.3.7.1 The policies discussed within **Table I.3.14** would help to promote an efficient use of land and reduce the loss of undeveloped land; however, the policies are not expected to fully mitigate these impacts as it is likely that large amounts of greenfield space would be required to meet the identified housing need.

Loss of land containing Best and Most Versatile (BMV) land

I.3.7.2 Although the policies discussed within **Table I.3.14** will help reduce the impact of new development on high quality soils, there are no policies which directly preserve BMV land. Therefore, these policies will not mitigate the anticipated loss of BMV agricultural land.

Loss of Mineral Safeguarding Area (MSA)

I.3.7.3 The policies discussed within **Table I.3.14** are expected to mitigate potential adverse impacts on minerals and Mineral Safeguarding Areas, by locating development away from valuable areas for resource extraction.

Table I.3.15: *Strategic sites post-mitigation impact matrix for SA Objective 6 – Natural Resources*

Site ref.	Site use	Previously undeveloped land	ALC	MSA
AS13	Residential led (Mixed-use)	-	--	0
AS21	Residential led (Mixed-use)	-	--	0
AS22	Residential led (Mixed-use)	-	--	0
AS24	Non-residential	-	+	0
AS26	Non-residential	-	-	0
CHR4	Residential led (Mixed-use)	-	--	0
HHH12	Residential led (Mixed-use)	-	--	0
HHH22	Residential led (Mixed-use)	-	--	0
HHH22/HHH31	Residential led (Mixed-use)	-	--	0
HHH26	Residential led (Mixed-use)	-	--	0
HHH3	Residential led	-	--	0
HHH31	Residential led (Mixed-use)	-	--	0
HHH35	Non-residential	-	--	0
HHH36	Non-residential	-	+	0
HHH6	Residential led (Mixed-use)	-	--	0
HW1	Residential led	-	-	0
LW6	Residential led	-	--	0
LW8	Residential led	-	--	0
RN8	Residential led (Mixed-use)	-	-	0
RN9	Residential led	-	--	0
RSE10	Residential led (Mixed-use)	-	--	0
SMI5	Non-residential	+	0	0
SMI6	Residential led (Mixed-use)	+	0	0
SNF3	Residential led	-	--	0
SR17	Residential led (Mixed-use)	-	--	0
SR9	Residential led (Mixed-use)	-	--	0
SR53	Residential led (Mixed-use opportunity area)	+	0	0

Table I.3.16: *Non-strategic sites post-mitigation impact matrix for SA Objective 6 – Natural resources*

Site ref.	Site use	Previously undeveloped land	ALC	MSA
AS1	Residential led	-	-	0
AS10	Residential led	-	-	0
AS11	Residential led (Mixed-use)	-	-	0
AS14	Residential led	-	-	0
AS15	Residential led	-	-	0
AS16	Residential led (Mixed-use)	+	0	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
AS17	Residential led	-	-	0
AS18	Residential led	-	-	0
AS2	Residential led	-	-	0
AS20	Residential led (Mixed-use)	-	--	0
AS23	Residential led (park homes)	-	+	0
AS25	Residential led	-	-	0
AS28	Residential led	-	+	0
AS29	Residential led	-	-	0
AS3	Residential led	-	-	0
AS5	Residential led (Mixed-use)	-	-	0
AS6	Residential led (Mixed-use)	-	-	0
AS7	Non-residential	+	0	0
AS8	Non-residential	-	-	0
AS9	Non-residential	-	--	0
CCB1	Residential led	+	0	0
CCB10	Residential led (Mixed-use)	+	0	0
CCB11	Residential led	+	0	0
CCB12	Residential led (Mixed-use)	-	+	0
CCB13	Residential led (Mixed-use)	+	0	0
CCB15	Residential led (Mixed-use)	+	0	0
CCB16	Residential led	-	+	0
CCB17	Residential led (Mixed-use)	+	0	0
CCB18	Residential led	-	+	0
CCB19	Residential led (Mixed-use)	+	0	0
CCB2	Residential led (Mixed-use)	+	0	0
CCB20	Residential led (Mixed-use)	+	0	0
CCB21	Residential led (Mixed-use)	+	0	0
CCB22	Residential led	+	0	0
CCB23	Residential led (Mixed-use)	+	0	0
CCB24	Residential led (Mixed-use)	+	0	0
CCB25	Residential led	+	0	0
CCB26	Residential led (Mixed-use)	+	0	0
CCB27	Residential led (Mixed-use)	+	0	0
CCB28	Residential led	+	0	0
CCB29	Residential led	-	+	0
CCB3	Residential led (Mixed-use)	+	0	0
CCB30	Residential led (Mixed-use)	-	+	0
CCB31	Residential led	-	+	0
CCB33	Residential led	+	0	0
CCB34	Residential led (Mixed-use)	+	0	0
CCB35	Non-residential	-	+	0
CCB36	Residential led (Mixed-use)	+	0	0
CCB37	Residential led (Mixed-use)	+	0	0
CCB38	Residential led	+	0	0
CCB39	Residential led	-	+	0
CCB4	Residential led	+	0	0
CCB40	Residential led	-	+	0
CCB41	Residential led	-	+	0
CCB43	Residential led	-	+	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
CCB44	Residential led	+	0	0
CCB46	Residential led	+	0	0
CCB48	Residential led	-	+	0
CCB49	Residential led	+	0	0
CCB5	Non-residential	-	+	0
CCB6	Residential led (Mixed-use)	+	0	0
CCB7	Residential led (Mixed-use)	-	+	0
CCB8	Residential led	+	0	0
CCB9	Residential led	+	0	0
CHR1	Residential led	+	0	0
CHR10	Residential led	-	-	0
CHR11	Residential led	+	0	0
CHR13	Residential led (Gypsy and Traveller)	-	-	0
CHR14	Residential led (Mixed-use)	-	-	0
CHR15	Non-residential	+	0	0
CHR16	Non-residential	-	-	0
CHR17	Non-residential	-	-	0
CHR18	Non-residential	+	0	0
CHR19	Non-residential	+	0	0
CHR2	Non-residential	-	+	0
CHR20	Residential led	-	+	0
CHR21	Non-residential	+	0	0
CHR3	Non-residential	-	-	0
CHR5	Non-residential	-	-	0
CHR6	Residential led	+	0	0
CHR7	Residential led	-	-	0
CHR8	Non-residential	+	0	0
FH1	Non-residential	+	0	0
FP1	Residential led	+	0	0
FP10	Residential led	-	+	0
FP11	Residential led (Mixed-use)	+	0	0
FP12	Residential led	+	0	0
FP14	Residential led	+	0	0
FP16	Residential led (Mixed-use)	+	0	0
FP17	Residential led	+	0	0
FP18	Residential led	+	0	0
FP19	Residential led	+	0	0
FP2	Residential led	+	0	0
FP22	Residential led	-	+	0
FP23	Residential led	+	0	0
FP25	Residential led (Mixed-use)	-	+	0
FP4	Residential led	+	0	0
FP5	Residential led	+	0	0
FP6	Residential led	+	0	0
FP7	Residential led	+	0	0
FP8	Residential led	+	0	0
FP9	Residential led	+	0	0
GN10	Residential led	-	+	0
GN11	Residential led	+	0	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
GN13	Residential led	-	+	0
GN14	Residential led	+	0	0
GN15	Residential led (Mixed-use)	+	0	0
GN3	Residential led	+	0	0
GN4	Residential led	+	0	0
GN5	Residential led	-	+	0
GN6	Residential led (Mixed-use)	-	+	0
GN8	Residential led	-	+	0
GS1	Residential led	+	0	0
GS10	Residential led (Mixed-use)	+	0	0
GS11	Residential led	+	0	0
GS12	Residential led (Mixed-use)	+	0	0
GS13	Residential led	+	0	0
GS14	Residential led (Mixed-use)	+	0	0
GS18	Residential led (Mixed-use)	+	0	0
GS19	Residential led	+	0	0
GS2	Residential led	-	+	0
GS20	Residential led	+	0	0
GS23	Residential led	+	0	0
GS24	Residential led	+	0	0
GS26	Residential led	+	0	0
GS27	Residential led (Mixed-use)	+	0	0
GS29	Residential led	+	0	0
GS30	Residential led	+	0	0
GS32	Residential led	-	+	0
GS33	Residential led	-	+	0
GS34	Residential led	+	0	0
GS35	Residential led	+	0	0
GS37	Residential led (Mixed-use)	+	0	0
GS4	Residential led	+	0	0
GS5	Residential led	+	0	0
GS6	Residential led	+	0	0
GS7	Residential led (Mixed-use)	+	0	0
GS8	Residential led (Mixed-use)	-	+	0
HHH1	Non-residential	-	-	0
HHH11	Residential led	-	-	0
HHH14	Residential led	-	-	0
HHH15	Residential led	-	-	0
HHH16	Non-residential	-	-	0
HHH17	Residential led	-	-	0
HHH18	Residential led (Mixed-use)	-	--	0
HHH19	Non-residential	-	-	0
HHH21	Non-residential	+	0	0
HHH23	Residential led (Mixed-use)	-	-	0
HHH24	Residential led	-	-	0
HHH25	Residential led	-	-	0
HHH28	Residential led (Mixed-use)	-	-	0
HHH29	Residential led (Mixed-use)	-	-	0
HHH30	Residential led (Mixed-use)	-	-	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
HHH32	Residential led	-	-	0
HHH33	Residential led	-	--	0
HHH37	Non-residential	-	-	0
HHH38	Non-residential	-	+	0
HHH39	Non-residential	-	+	0
HHH4	Residential led	-	-	0
HHH40	Residential led	-	-	0
HHH41	Residential led	-	-	0
HHH5	Residential led	-	-	0
HHH7	Residential led	-	--	0
HHH8	Residential led (Mixed-use)	-	--	0
HHH9	Residential led	-	-	0
HW11	Residential led	-	-	0
HW3	Residential and secondary school	-	--	0
HW5	Non-residential	+	0	0
HW6	Residential led	-	-	0
HW7	Residential or non-residential	-	-	0
HW8	Residential led	-	+	0
L11	Residential led	-	+	0
L12	Residential led	-	+	0
L2	Residential led	-	+	0
L3	Residential led	+	0	0
L7	Residential led	+	0	0
L9	Residential led	+	0	0
LW10	Residential led	-	-	0
LW2	Residential led	-	+	0
LW3	Residential led	-	+	0
LW4	Residential led	-	--	0
LW5	Residential led (C2 use)	+	0	0
LW7	Residential led	-	--	0
PP1	Residential led	-	-	0
REWW3	Residential led	+	0	0
RN1	Residential led	-	-	0
RN10	Residential led	-	-	0
RN11	Residential led	-	+	0
RN12	Non-residential	-	+	0
RN14	Residential led	-	-	0
RN16	Residential led	-	-	0
RN17	Residential led	-	-	0
RN18	Residential led	+	0	0
RN19	Residential led	-	-	0
RN2	Residential led (Mixed-use)	-	-	0
RN22	Residential led	-	-	0
RN23	Residential led	-	-	0
RN24	Residential led	+	0	0
RN25	Residential led	-	-	0
RN26	Residential led (Mixed-use)	-	+	0
RN27	Residential led	-	-	0
RN28	Residential led	-	-	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
RN29	Residential led	+	0	0
RN3	Residential led	+	0	0
RN30	Residential led	-	-	0
RN31	Residential led	-	-	0
RN32	Residential led	-	-	0
RN33	Non-residential	-	-	0
RN34	Residential led	-	-	0
RN4	Residential led (Mixed-use)	-	-	0
RN5	Residential led (Mixed-use)	-	--	0
RSE1	Non-residential	-	-	0
RSE11	Non-residential	+	0	0
RSE4	Residential led	-	-	0
RSE8	Residential led (Mixed-use)	-	-	0
RSE9	Residential led	-	-	0
RWB1	Residential led	-	+	0
RWB10	Non-residential	+	0	0
RWB11	Residential led	+	0	0
RWB12	Residential led	+	0	0
RWB14	Residential led	+	0	0
RWB15	Residential led	+	0	0
RWB17	Residential led	+	0	0
RWB18	Residential led	+	0	0
RWB19	Residential led (Mixed-use)	+	0	0
RWB2	Residential led	-	+	0
RWB20	Residential led	+	0	0
RWB21	Residential led	+	0	0
RWB23	Non-residential	-	+	0
RWB25	Residential led	+	0	0
RWB3	Residential led	-	+	0
RWB4	Residential led	-	+	0
RWB5	Non-residential	-	-	0
RWB6	Residential led	-	+	0
RWB8	Residential led (Mixed-use)	+	0	0
RWB9	Residential led (Mixed-use)	+	0	0
SMI1	Residential led	+	0	0
SMI2	Non-residential	+	0	0
SNF1	Residential led	-	-	0
SNF10	Residential led (Mixed-use)	+	0	0
SNF12	Residential led	-	+	0
SNF13	Residential led (Mixed-use)	+	0	0
SNF15	Residential led (Mixed-use)	+	0	0
SNF16	Residential led (Mixed-use)	+	0	0
SNF17	Residential led	+	0	0
SNF18	Residential led (Mixed-use)	+	0	0
SNF19	Non-residential	+	0	0
SNF2	Residential led (Mixed-use)	-	-	0
SNF20	Residential led	+	0	0
SNF21	Residential led (Mixed-use)	+	0	0
SNF22	Residential led (Mixed-use)	+	0	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
SNF23	Residential led (Mixed-use)	+	0	0
SNF24	Residential led (Mixed-use)	+	0	0
SNF25	Non-residential	+	0	0
SNF26	Non-residential	-	+	0
SNF27	Residential led	-	+	0
SNF28	Non-residential	+	0	0
SNF30	Residential led (Mixed-use)	+	0	0
SNF31	Residential led (Mixed-use)	+	0	0
SNF32	Residential led	-	+	0
SNF33	Non-residential	+	0	0
SNF34	Residential led (Mixed-use)	+	0	0
SNF35	Residential led (Mixed-use)	+	0	0
SNF36	Residential led (Mixed-use)	-	+	0
SNF37	Residential led (Mixed-use)	-	+	0
SNF38	Residential led	-	0	0
SNF39	Residential led	-	+	0
SNF41	Residential led (Mixed-use)	+	0	0
SNF43	Residential led	-	+	0
SNF44	Residential led	+	0	0
SNF5	Residential led	-	+	0
SNF6	Residential led	-	+	0
SNF8	Residential led (Mixed-use)	+	0	0
SNF9	Residential led (Mixed-use)	-	+	0
SR1	Residential led	-	-	0
SR10	Residential led	-	-	0
SR13	Residential led	-	-	0
SR14	Residential led	-	-	0
SR15	Residential led	-	-	0
SR16	Residential led	-	-	0
SR18	Residential led (Mixed-use)	-	-	0
SR2	Non-residential	-	--	0
SR21	Residential led	-	-	0
SR22	Residential led	-	-	0
SR24	Residential led	-	-	0
SR25	Residential led	-	-	0
SR27	Residential led	-	-	0
SR29	Non-residential	-	+	0
SR3	Residential led	-	-	0
SR30	Residential led (Mixed-use)	+	0	0
SR31	Residential led (Mixed-use)	+	0	0
SR32	Residential led (Mixed-use)	-	-	0
SR33	Non-residential	+	0	0
SR34	Residential led	+	0	0
SR35	Non-residential	+	0	0
SR36	Residential led (Mixed-use)	+	0	0
SR37	Residential led (Mixed-use)	+	0	0
SR38	Residential led (Mixed-use)	+	0	0
SR39	Residential led (Mixed-use)	-	-	0
SR4	Residential led	-	-	0

Site ref.	Site use	Previously undeveloped land	ALC	MSA
SR40	Residential led (Mixed-use)	+	0	0
SR41	Residential led (Mixed-use)	-	-	0
SR42	Residential led	-	-	0
SR43	Residential led	-	-	0
SR45	Non-residential	-	-	0
SR46	Residential led	-	-	0
SR47	Residential led	-	-	0
SR48	Residential led	+	0	0
SR49	Residential led	-	-	0
SR5	Residential led	-	-	0
SR50	Residential led	+	0	0
SR51	Residential led (Mixed-use)	-	--	0
SR52	Residential led (Mixed-use)	-	--	0
SR6	Residential led (Mixed-use)	-	-	0
SR7	Residential led	-	-	0
SR8	Residential led	-	-	0
SW1	Residential led	+	0	0
SW2	Residential led	-	+	0
SW3	Residential led	+	0	0
SW5	Residential led	+	0	0
SW6	Residential led	-	+	0
SW7	Residential led	-	+	0
SW8	Residential led	-	+	0
T1	Non-residential	-	+	0
T2	Residential led	-	-	0
T3	Residential led	-	+	0
W1	Residential led	-	+	0
W11	Non-residential	-	+	0
W12	Residential led	+	0	0
W13	Non-residential	-	-	0
W14	Non-residential	+	0	0
W3	Residential led	+	0	0
W4	Residential led	+	0	0
W7	Residential led	-	+	0
W8	Residential led	-	+	0

I.3.8 SA Objective 8: Health and wellbeing

Table I.3.17: *Identified adverse effects and policy mitigation for SA8: Health and wellbeing*

Identified adverse impact	Potential mitigating influence of MLP policies
Limited access to healthcare/leisure facilities	Policy T27 (Reducing health inequalities and promoting health and wellbeing) aims to locate health and wellbeing facilities close to local services whilst encouraging transport provision to those areas, as well as requiring Health Impact Assessments for specific development proposals.

Identified adverse impact	Potential mitigating influence of MLP policies
	Policy T26 (Accessibility standards) requires new developments to meet standards for 15-minute journey times to local destination. This will, in turn, improve accessibility to healthcare provision. Policies including DM15, T4, T5, T10, T27, S14 and S15 all encourage development to be situated in areas accessible to public transport, which is likely to improve access to healthcare facilities.
Net loss of public greenspace	Policy T28 (Existing open space, outdoor sports and play spaces) and Policy DM21 (New open space, outdoor sports and play spaces) encourages adequate open space and greenspace provision, including the replacement of open space or greenspace that may be lost to development. Policy T27 (Reducing health inequalities and promoting health and wellbeing) aims to increase accessibility to recreational opportunities, which includes access to greenspaces. Policy S5 (Securing strong green and blue infrastructure) will help to conserve and enhance the GI network and greenspaces in Medway.

Limited access to healthcare/leisure facilities

I.3.8.1 Although the policies discussed within **Table I.3.17** are likely to ensure new development is located near to some healthcare and leisure facilities, and other MLP policies set out transport improvements, there are no policies which are likely to directly improve access to a hospital with an A&E department, in particular for rural developments in the Hoo Peninsula. Access to GP surgeries is likely to remain limited throughout the area. Consequently, these policies are not expected to fully mitigate limited access to healthcare and leisure facilities.

Net loss of public greenspace

I.3.8.2 The policies discussed within **Table I.3.17** are likely to ensure that development proposals replace any lost greenspace and therefore these policies are expected to mitigate any net losses to public greenspace.

Table I.3.18: *Strategic sites post-mitigation impact matrix for SA Objective 8 – Health and wellbeing*

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
AS13	Residential led (Mixed-use)	-	+	+	+	0	+
AS21	Residential led (Mixed-use)	-	-	+	+	0	+
AS22	Residential led (Mixed-use)	-	-	+	+	0	+
AS24	Non-residential	-	-	-	-	0	-
AS26	Non-residential	-	-	-	-	0	+
CHR4	Residential led (Mixed-use)	-	-	+	+	0	+
HHH12	Residential led (Mixed-use)	-	+	+	+	0	+
HHH22	Residential led (Mixed-use)	-	-	-	-	0	+

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Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
HHH22/ HHH31	Residential led (Mixed-use)	-	-	-	-	0	+
HHH26	Residential led (Mixed-use)	-	-	+	+	0	+
HHH3	Residential led	-	-	+	+	0	+
HHH31	Residential led (Mixed-use)	-	-	-	-	0	+
HHH35	Non-residential	-	-	-	-	0	+
HHH36	Non-residential	-	-	-	+	0	+
HHH6	Residential led (Mixed-use)	-	-	+	+	0	+
HW1	Residential led	+	-	-	+	0	+
LW6	Residential led	+	-	-	+	0	+
LW8	Residential led	+	-	-	+	0	+
RN8	Residential led (Mixed-use)	+	-	+	+	0	+
RN9	Residential led	+	+	+	+	0	+
RSE10	Residential led (Mixed-use)	-	+	+	+	0	+
SMI5	Non-residential	+	+	+	+	0	+
SMI6	Residential led (Mixed-use)	+	+	+	+	0	+
SNF3	Residential led	-	-	+	+	0	+
SR17	Residential led (Mixed-use)	-	-	+	+	0	+
SR9	Residential led (Mixed-use)	-	-	+	+	0	+
SR53	Residential led (Mixed-use opportunity area)	+	-	-	-	0	+

Table I.3.19: *Non-strategic sites post-mitigation impact matrix for SA Objective 8 – Health and wellbeing*

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
AS1	Residential led	-	-	-	-	0	+
AS10	Residential led	-	-	-	+	0	+
AS11	Residential led (Mixed-use)	-	-	-	+	0	+
AS14	Residential led	-	+	-	+	0	+
AS15	Residential led	-	+	-	+	0	+
AS16	Residential led (Mixed-use)	-	+	-	+	0	+
AS17	Residential led	-	+	-	+	0	+
AS18	Residential led	-	-	-	+	0	+
AS2	Residential led	-	-	-	-	0	+
AS20	Residential led (Mixed-use)	-	-	-	+	0	+
AS23	Residential led (park homes)	-	-	-	+	0	+
AS25	Residential led	-	-	-	+	0	+
AS28	Residential led	-	-	-	+	0	+
AS29	Residential led	-	+	-	+	0	-

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
AS3	Residential led	-	-	-	-	0	+
AS5	Residential led (Mixed-use)	-	-	-	-	0	+
AS6	Residential led (Mixed-use)	-	-	-	-	0	+
AS7	Non-residential	-	-	-	-	0	+
AS8	Non-residential	-	-	-	-	0	+
AS9	Non-residential	-	-	-	-	0	+
CCB1	Residential led	+	+	-	+	0	+
CCB10	Residential led (Mixed-use)	+	+	-	+	0	+
CCB11	Residential led	+	+	+	+	0	+
CCB12	Residential led (Mixed-use)	+	+	-	+	0	+
CCB13	Residential led (Mixed-use)	+	+	+	+	0	+
CCB15	Residential led (Mixed-use)	+	+	+	+	0	+
CCB16	Residential led	+	+	+	+	0	+
CCB17	Residential led (Mixed-use)	+	+	+	+	0	+
CCB18	Residential led	+	+	+	+	0	+
CCB19	Residential led (Mixed-use)	+	+	+	+	0	+
CCB2	Residential led (Mixed-use)	+	+	-	+	0	+
CCB20	Residential led (Mixed-use)	+	+	+	+	0	+
CCB21	Residential led (Mixed-use)	+	+	+	+	0	+
CCB22	Residential led	+	+	+	+	0	+
CCB23	Residential led (Mixed-use)	+	+	+	+	0	+
CCB24	Residential led (Mixed-use)	+	+	+	+	0	+
CCB25	Residential led	+	-	+	+	0	+
CCB26	Residential led (Mixed-use)	+	+	+	+	0	+
CCB27	Residential led (Mixed-use)	+	+	+	+	0	+
CCB28	Residential led	+	+	-	+	0	+
CCB29	Residential led	+	+	+	+	-	+
CCB3	Residential led (Mixed-use)	+	+	-	+	0	+
CCB30	Residential led (Mixed-use)	+	+	+	+	0	+
CCB31	Residential led	+	+	+	+	0	+
CCB33	Residential led	+	+	+	+	0	+
CCB34	Residential led (Mixed-use)	+	+	+	+	0	+
CCB35	Non-residential	+	+	+	+	0	+
CCB36	Residential led (Mixed-use)	+	+	+	+	0	+
CCB37	Residential led (Mixed-use)	+	+	+	+	0	+
CCB38	Residential led	+	+	+	+	0	+
CCB39	Residential led	+	+	+	+	0	+
CCB4	Residential led	+	+	-	+	0	+
CCB40	Residential led	+	+	+	+	-	+
CCB41	Residential led	+	+	-	+	0	+
CCB43	Residential led	+	-	+	+	0	+
CCB44	Residential led	+	+	+	+	0	+
CCB46	Residential led	+	+	+	+	0	+
CCB48	Residential led	+	+	+	+	0	+
CCB49	Residential led	+	+	-	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
CCB5	Non-residential	+	+	+	+	-	+
CCB6	Residential led (Mixed-use)	+	+	-	+	0	+
CCB7	Residential led (Mixed-use)	+	+	+	+	0	+
CCB8	Residential led	+	+	+	+	0	+
CCB9	Residential led	+	+	-	+	0	+
CHR1	Residential led	-	-	-	+	0	+
CHR10	Residential led	-	+	-	+	0	+
CHR11	Residential led	-	+	-	+	0	+
CHR13	Residential led (Gypsy and Traveller)	-	-	-	+	0	+
CHR14	Residential led (Mixed-use)	-	-	-	+	0	+
CHR15	Non-residential	-	-	-	+	0	+
CHR16	Non-residential	-	-	-	+	0	+
CHR17	Non-residential	-	+	-	+	0	+
CHR18	Non-residential	-	-	+	+	0	+
CHR19	Non-residential	+	+	+	+	0	+
CHR2	Non-residential	-	-	-	+	0	+
CHR20	Residential led	+	-	+	+	0	+
CHR21	Non-residential	+	+	+	+	0	+
CHR3	Non-residential	-	-	-	-	0	+
CHR5	Non-residential	-	+	-	+	0	+
CHR6	Residential led	-	-	-	+	0	+
CHR7	Residential led	-	-	-	+	0	+
CHR8	Non-residential	-	-	-	+	0	+
FH1	Non-residential	+	+	-	+	0	+
FP1	Residential led	+	+	-	+	0	+
FP10	Residential led	+	+	-	+	0	+
FP11	Residential led (Mixed-use)	+	+	-	+	0	+
FP12	Residential led	+	+	-	+	0	+
FP14	Residential led	+	+	-	+	0	+
FP16	Residential led (Mixed-use)	+	+	-	+	0	+
FP17	Residential led	+	+	-	+	0	+
FP18	Residential led	+	+	-	+	0	+
FP19	Residential led	+	+	-	+	0	+
FP2	Residential led	+	+	-	+	0	+
FP22	Residential led	+	+	-	+	0	+
FP23	Residential led	+	+	+	+	0	+
FP25	Residential led (Mixed-use)	+	+	-	+	0	+
FP4	Residential led	+	+	-	+	0	+
FP5	Residential led	+	+	-	+	0	+
FP6	Residential led	+	+	-	+	0	+
FP7	Residential led	+	+	-	+	0	+
FP8	Residential led	+	+	-	+	0	+
FP9	Residential led	+	+	-	+	0	+
GN10	Residential led	+	-	+	+	0	+
GN11	Residential led	+	-	+	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
GN13	Residential led	+	-	+	+	0	+
GN14	Residential led	+	+	+	+	0	+
GN15	Residential led (Mixed-use)	+	+	+	+	-	+
GN3	Residential led	+	+	+	+	0	+
GN4	Residential led	+	+	+	+	0	+
GN5	Residential led	+	+	+	+	0	+
GN6	Residential led (Mixed-use)	+	+	+	+	0	+
GN8	Residential led	+	-	+	+	0	+
GS1	Residential led	+	+	+	+	0	+
GS10	Residential led (Mixed-use)	+	+	+	+	0	+
GS11	Residential led	+	+	+	+	0	+
GS12	Residential led (Mixed-use)	+	+	+	+	0	+
GS13	Residential led	+	+	+	+	0	+
GS14	Residential led (Mixed-use)	+	+	+	+	0	+
GS18	Residential led (Mixed-use)	+	+	+	+	0	+
GS19	Residential led	+	+	+	+	0	+
GS2	Residential led	+	+	+	+	0	+
GS20	Residential led	+	+	+	+	0	+
GS23	Residential led	+	+	+	+	0	+
GS24	Residential led	+	+	+	+	-	+
GS26	Residential led	+	+	+	+	0	+
GS27	Residential led (Mixed-use)	+	+	+	+	0	+
GS29	Residential led	+	+	+	+	0	+
GS30	Residential led	+	+	+	+	0	+
GS32	Residential led	+	+	+	+	0	+
GS33	Residential led	+	+	-	+	0	+
GS34	Residential led	+	+	+	+	0	+
GS35	Residential led	+	+	-	+	0	+
GS37	Residential led (Mixed-use)	+	+	+	+	0	+
GS4	Residential led	+	+	+	+	0	+
GS5	Residential led	+	+	+	+	0	+
GS6	Residential led	+	+	+	+	0	+
GS7	Residential led (Mixed-use)	+	+	+	+	0	+
GS8	Residential led (Mixed-use)	+	+	+	+	0	+
HHH1	Non-residential	-	-	-	+	0	+
HHH11	Residential led	-	-	+	+	0	+
HHH14	Residential led	-	-	+	+	0	+
HHH15	Residential led	-	-	-	+	0	+
HHH16	Non-residential	-	-	+	+	0	-
HHH17	Residential led	-	-	+	+	0	-
HHH18	Residential led (Mixed-use)	-	-	-	+	0	+
HHH19	Non-residential	-	-	-	+	0	+
HHH21	Non-residential	-	-	-	+	0	+
HHH23	Residential led (Mixed-use)	-	-	-	+	0	+
HHH24	Residential led	-	+	-	-	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
HHH25	Residential led	-	+	-	-	0	+
HHH28	Residential led (Mixed-use)	-	-	-	-	0	+
HHH29	Residential led (Mixed-use)	-	-	-	-	0	+
HHH30	Residential led (Mixed-use)	-	-	-	-	0	+
HHH32	Residential led	-	-	-	-	0	+
HHH33	Residential led	-	-	-	-	0	+
HHH37	Non-residential	-	-	-	-	0	+
HHH38	Non-residential	-	-	-	-	0	-
HHH39	Non-residential	-	-	-	-	0	+
HHH4	Residential led	-	-	+	+	0	+
HHH40	Residential led	-	-	-	+	0	+
HHH41	Residential led	-	-	+	+	0	+
HHH5	Residential led	-	-	-	+	0	+
HHH7	Residential led	-	-	+	+	-	-
HHH8	Residential led (Mixed-use)	-	-	+	+	0	+
HHH9	Residential led	-	-	+	+	0	+
HW11	Residential led	+	-	-	+	0	+
HW3	Residential and secondary school	+	-	-	+	0	+
HW5	Non-residential	+	-	-	+	0	+
HW6	Residential led	-	-	-	+	0	+
HW7	Residential or non-residential	-	-	-	-	0	+
HW8	Residential led	-	+	-	+	0	+
L11	Residential led	+	+	-	+	0	+
L12	Residential led	+	+	-	+	0	+
L2	Residential led	+	+	-	+	0	+
L3	Residential led	+	+	-	+	0	+
L7	Residential led	+	+	-	+	0	+
L9	Residential led	+	+	-	+	0	+
LW10	Residential led	+	+	-	+	0	+
LW2	Residential led	+	+	-	+	0	+
LW3	Residential led	+	+	-	+	0	+
LW4	Residential led	+	-	-	+	0	+
LW5	Residential led (C2 use)	+	+	-	+	0	+
LW7	Residential led	+	-	-	+	0	+
PP1	Residential led	+	+	-	+	0	+
REWW3	Residential led	+	+	-	+	0	+
RN1	Residential led	+	-	+	+	0	+
RN10	Residential led	+	-	+	+	0	+
RN11	Residential led	+	+	+	+	-	+
RN12	Non-residential	+	+	+	+	-	+
RN14	Residential led	+	-	+	+	0	+
RN16	Residential led	+	-	+	+	0	+
RN17	Residential led	+	-	+	+	0	+
RN18	Residential led	-	+	+	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
RN19	Residential led	+	-	+	+	0	+
RN2	Residential led (Mixed-use)	+	-	-	+	0	+
RN22	Residential led	-	-	+	+	0	+
RN23	Residential led	-	-	+	+	0	+
RN24	Residential led	-	+	-	+	0	+
RN25	Residential led	-	-	-	+	0	+
RN26	Residential led (Mixed-use)	-	-	-	-	0	+
RN27	Residential led	-	-	-	+	0	+
RN28	Residential led	-	+	-	+	0	+
RN29	Residential led	-	-	-	+	0	+
RN3	Residential led	+	+	+	+	0	+
RN30	Residential led	-	-	-	+	0	+
RN31	Residential led	-	-	-	+	0	+
RN32	Residential led	-	-	+	+	0	+
RN33	Non-residential	-	-	-	+	0	+
RN34	Residential led	+	-	+	+	0	+
RN4	Residential led (Mixed-use)	+	-	-	+	0	+
RN5	Residential led (Mixed-use)	+	-	-	+	0	+
RSE1	Non-residential	0	0	0	0	0	0
RSE11	Non-residential	-	+	-	+	0	+
RSE4	Residential led	-	-	-	+	0	+
RSE8	Residential led (Mixed-use)	-	+	-	-	0	+
RSE9	Residential led	-	+	-	+	0	+
RWB1	Residential led	+	+	-	+	0	+
RWB10	Non-residential	+	+	-	+	0	+
RWB11	Residential led	+	+	-	+	0	+
RWB12	Residential led	+	+	-	+	0	+
RWB14	Residential led	+	+	-	+	0	+
RWB15	Residential led	+	+	-	+	0	+
RWB17	Residential led	+	+	-	+	0	+
RWB18	Residential led	+	+	-	+	0	+
RWB19	Residential led (Mixed-use)	+	+	-	+	0	+
RWB2	Residential led	+	+	-	+	0	+
RWB20	Residential led	+	+	-	+	0	+
RWB21	Residential led	+	+	-	+	0	+
RWB23	Non-residential	+	+	-	+	0	+
RWB25	Residential led	+	+	-	+	0	+
RWB3	Residential led	+	+	-	+	0	+
RWB4	Residential led	+	-	-	+	0	+
RWB5	Non-residential	+	-	-	+	0	+
RWB6	Residential led	+	-	-	+	0	+
RWB8	Residential led (Mixed-use)	+	+	-	+	0	+
RWB9	Residential led (Mixed-use)	+	+	-	+	0	+
SMI1	Residential led	+	+	+	+	0	+
SMI2	Non-residential	+	+	+	+	-	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
SNF1	Residential led	-	-	+	+	0	+
SNF10	Residential led (Mixed-use)	+	+	+	+	0	+
SNF12	Residential led	+	+	+	+	-	+
SNF13	Residential led (Mixed-use)	+	+	+	+	0	+
SNF15	Residential led (Mixed-use)	+	+	+	+	0	+
SNF16	Residential led (Mixed-use)	+	+	+	+	0	+
SNF17	Residential led	+	+	+	+	0	+
SNF18	Residential led (Mixed-use)	+	+	+	+	0	+
SNF19	Non-residential	+	+	+	+	0	+
SNF2	Residential led (Mixed-use)	-	-	+	-	0	+
SNF20	Residential led	+	+	+	+	0	+
SNF21	Residential led (Mixed-use)	+	+	+	+	0	+
SNF22	Residential led (Mixed-use)	+	+	+	+	0	+
SNF23	Residential led (Mixed-use)	+	+	+	+	0	+
SNF24	Residential led (Mixed-use)	+	+	+	+	0	+
SNF25	Non-residential	+	+	+	+	0	+
SNF26	Non-residential	+	+	+	+	0	+
SNF27	Residential led	+	+	+	+	0	+
SNF28	Non-residential	+	+	+	+	-	+
SNF30	Residential led (Mixed-use)	+	+	+	+	0	+
SNF31	Residential led (Mixed-use)	+	+	+	+	0	+
SNF32	Residential led	+	+	+	+	0	+
SNF33	Non-residential	+	+	+	+	0	+
SNF34	Residential led (Mixed-use)	+	+	+	+	0	+
SNF35	Residential led (Mixed-use)	+	+	+	+	-	+
SNF36	Residential led (Mixed-use)	+	+	+	+	0	+
SNF37	Residential led (Mixed-use)	+	+	+	+	0	+
SNF38	Residential led	+	+	+	+	0	+
SNF39	Residential led	+	+	+	+	0	+
SNF41	Residential led (Mixed-use)	+	+	+	+	0	+
SNF43	Residential led	+	+	-	+	0	+
SNF44	Residential led	+	+	-	+	0	+
SNF5	Residential led	+	+	+	+	0	+
SNF6	Residential led	+	+	+	+	0	+
SNF8	Residential led (Mixed-use)	+	+	+	+	0	+
SNF9	Residential led (Mixed-use)	+	+	+	+	0	+
SR1	Residential led	-	-	-	-	0	+
SR10	Residential led	-	-	-	-	0	+
SR13	Residential led	+	+	-	+	0	+
SR14	Residential led	-	+	-	+	0	+
SR15	Residential led	+	+	-	+	0	+
SR16	Residential led	-	+	-	+	0	+
SR18	Residential led (Mixed-use)	-	+	-	+	0	+
SR2	Non-residential	-	-	-	-	-	+
SR21	Residential led	-	+	-	+	0	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
SR22	Residential led	-	+	-	+	0	+
SR24	Residential led	-	-	-	-	0	+
SR25	Residential led	+	+	-	+	0	+
SR27	Residential led	+	-	-	+	0	+
SR29	Non-residential	+	-	-	-	0	-
SR3	Residential led	-	-	-	+	0	+
SR30	Residential led (Mixed-use)	+	-	-	+	0	+
SR31	Residential led (Mixed-use)	+	-	-	-	0	-
SR32	Residential led (Mixed-use)	+	-	-	+	0	+
SR33	Non-residential	+	-	-	-	0	+
SR34	Residential led	+	-	-	+	0	+
SR35	Non-residential	+	-	-	-	0	+
SR36	Residential led (Mixed-use)	+	-	-	+	0	-
SR37	Residential led (Mixed-use)	+	-	-	+	0	-
SR38	Residential led (Mixed-use)	+	-	-	+	0	-
SR39	Residential led (Mixed-use)	+	-	-	-	0	-
SR4	Residential led	-	+	-	+	0	+
SR40	Residential led (Mixed-use)	+	-	-	+	0	-
SR41	Residential led (Mixed-use)	-	-	-	+	0	+
SR42	Residential led	-	-	-	+	0	+
SR43	Residential led	-	-	-	+	0	+
SR45	Non-residential	-	-	-	+	0	+
SR46	Residential led	-	-	-	+	0	+
SR47	Residential led	-	-	-	+	0	+
SR48	Residential led	-	-	-	+	0	+
SR49	Residential led	+	-	-	+	0	+
SR5	Residential led	+	-	-	+	0	+
SR50	Residential led	+	-	-	+	-	+
SR51	Residential led (Mixed-use)	-	+	-	+	-	+
SR52	Residential led (Mixed-use)	-	-	-	+	-	+
SR6	Residential led (Mixed-use)	-	-	-	+	0	+
SR7	Residential led	-	+	-	+	0	+
SR8	Residential led	-	-	-	+	0	+
SW1	Residential led	-	+	+	+	0	+
SW2	Residential led	-	+	+	+	0	+
SW3	Residential led	-	+	+	+	0	+
SW5	Residential led	-	+	+	+	0	+
SW6	Residential led	+	+	+	+	0	+
SW7	Residential led	-	+	+	+	0	+
SW8	Residential led	+	+	+	+	0	+
T1	Non-residential	+	+	-	+	0	+
T2	Residential led	+	+	-	+	0	+
T3	Residential led	+	+	+	+	0	+
W1	Residential led	+	+	+	+	0	+
W11	Non-residential	+	+	-	+	-	+

Site ref.	Site use	NHS hospital	GP surgery	Leisure facilities	Access to public greenspace	Net loss of public greenspace	PRoW / cycle network
W12	Residential led	+	-	-	+	0	+
W13	Non-residential	+	+	-	+	0	+
W14	Non-residential	+	+	+	+	0	+
W3	Residential led	+	+	-	+	0	+
W4	Residential led	+	+	+	+	0	+
W7	Residential led	+	+	-	+	0	-
W8	Residential led	+	+	-	+	0	+

I.3.9 SA Objective 9: Cultural heritage

Table I.3.20: *Identified adverse effects and policy mitigation for SA9: Cultural heritage*

Identified adverse impact	Potential mitigating influence of MLP policies
Alteration of character or setting of a heritage asset	Policy S8 (Historic environment) supports development that "*positively contributes to local distinctiveness and character*", and *"ensuring development preserves or enhances the significance of designated and non-designated heritage assets and their settings."* This includes making sensitive and sustainable reuse of heritage assets, especially those of 'at risk' registers. Policy DM9 (Heritage assets) ensures that development that impacts a heritage asset or its setting achieves *"a high quality of design which will preserve and seek to enhance the asset's significance and setting."* A Heritage Statement will also be required for development proposals in proximity to heritage assets, including those on the HAR register. No demolition or loss of a heritage asset will be permitted unless exceptional circumstances are demonstrated. Policy DM10 (Conservation areas) only permits development within a Conservation Area where it *"contributes positively to the conservation and enhancement of the character, appearance and distinctiveness of the area."* Policy S9 (Star Hill to Sun Pier) focuses on conserving and enhancing assets within the identified Heritage Action Zone (HAZ)[5]. New development should focus on *"re-establishing the area as a social, cultural and dynamic destination whilst preserving and enhancing the special historic interest and character of the neighbourhood."* Policy DM11 (Scheduled monuments and archaeological sites) does not permit development which adversely impacts Scheduled Monuments or their setting, including those on the HAR register. Policy T1 (Promoting high quality design) encourages developments which respond to the character and appearance of their settings. Policy S4 (Landscape protection and enhancement) seeks to conserve and enhance Medway's landscape character and local distinctiveness, including its historic character.

[5] Historic England (2024). Heritage Action Zones: Breathing New Life Into Old Places. Available at: https://historicengland.org.uk/services-skills/heritage-action-zones/ [Date accessed: 13/05/24]

Alteration of character or setting of heritage assets

I.3.9.1 The MLP policies will be expected to mitigate the identified adverse effects on the local historic environment associated with development proposals, including impacts on the character and/or setting of Listed Buildings, Conservation Areas, SMs and RPGs. As such, negligible impacts on these heritage assets are identified for all reasonable alternative sites.

I.3.9.2 Depending on the site-specific characteristics and the nature/significance of local heritage assets, the details of which will not be known until the planning application stage, the MLP policies could potentially provide enhancements to heritage assets, which could lead to longer term positive effects on the receptors as listed in **Table I.3.20** or the historic environment in general.

I.3.10 SA Objective 10: Transport and accessibility

Table I.3.21: *Identified adverse effects and policy mitigation for SA10: Transport and accessibility*

Identified adverse impact	Potential mitigating influence of MLP policies
Limited access to bus services	Policy DM18 (Transport assessments, transport statements and travel plans) requires all development proposals that will generate a significant amount of movement will be supported by a Transport Assessment or Statement, or commitment to provide one. Policy T26 (Accessibility standards) requires all proposals to be accessible to a secondary school or social space via a 15-minute bus journey. Policies including DM15, T4, T5, T10, T27, S16 and S17 all encourage development to be situated in areas accessible to public transport whilst encouraging co-location of services. This includes improving provision for bus links to surrounding areas and services. The Spatial development strategy encourages improved public transport provision, including bus networks. Policy S24 (Infrastructure delivery) aims to ensure that new development proposals provide new and improved infrastructure, including transport provision.
Limited access to railway stations	Policy DM17 (Grain Branch) aims to safeguard land for potential a new railway station and will not permit development that may compromise new rail infrastructure in this area. Policies including Policy DM15, T4, T5, T10, T27, S16 and S17 all encourage development to be situated in areas accessible to public transport, including railway stations. The Spatial Development Strategy encourages improved public transport provision, including railway networks. Policy S24 (Infrastructure delivery) aims to ensure that new development proposals provide new and improved infrastructure, including transport provision.
Limited access to local services and facilities	Policy T26 (Accessibility standards) requires all major developments to be within a 15-minute walk or cycle ride to a grocery shop, as well as places to socialise and exercise. Policies including Policy T5, T10, T27, S16 and S17 all encourage development to be situated in areas accessible to local services.

Identified adverse impact	Potential mitigating influence of MLP policies
	Policy T4 (Supported housing, nursing homes and older persons accommodation) requires that developments for older people is easily accessible to local services. The Spatial Development Strategy encourages improved public transport provision, promoting links to local services that require minimal travel. Policy S24 (Infrastructure delivery) aims to ensure that new development proposals provide new and improved infrastructure, including transport provision.
Limited access to pedestrian walkways and cycleways	Policy T26 (Accessibility standards) requires that a variety of local amenities are located within a 15-minute walk or cycleway to major development proposals. Policy T27 (Reducing health inequalities and supporting health and wellbeing) encourages improvements to walking, wheelchair and cycling routes. Policy DM18 (Transport assessments, transport statements and travel plans) requires all development proposals that will generate a significant amount of movement will be supported by a Transport Assessment or Statement, or commitment to provide one. Policy DM20 (Cycle parking and storage) determines that development proposals will be in accordance with the adopted cycle parking standard, including long-term and short-term parking. Policies T20 (Riverside path), DM16 (Chatham Waters Line), and T21 (Riverside infrastructure) stipulate that development will facilitate improved walking and cycling access in these areas. Policy T5 (Student accommodation) encourages developments to be well served by walking and cycling options. The Spatial Development Strategy encourages improvements to sustainable travel choices, including providing walkways and cycleways. Policy S24 (Infrastructure delivery) aims to ensure that new development proposals provide new and improved infrastructure, including pedestrian walkways and cycleways.

Limited access to bus services

I.3.10.1 The proposed improvements to the transport network through the policies discussed within **Table I.3.21** are expected to mitigate the restricted access to bus services within Medway, including improved bus access to secondary schools and social spaces from rural areas.

Limited access to railway stations

I.3.10.2 The proposed improvements to the transport network through the policies are not expected to mitigate the restricted access to railway services in Medway, as it does not provide explicit plans to for improvements to or directly establishing new railway provisions.

Limited access to local services and facilities

I.3.10.3 The policies discussed within **Table I.3.21** are expected to improve sustainable access to local services and facilities across Medway.

Limited access to pedestrian walkways and cycleways

I.3.10.4 The policies discussed within **Table I.3.21** are expected to improve sustainable access to pedestrian walkways and cycleways across Medway.

Table I.3.22: *Strategic sites post-mitigation impact matrix for SA Objective 10 – Transport and accessibility*

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
AS13	Residential led (Mixed-use)	+	-	0	+	0
AS21	Residential led (Mixed-use)	+	-	+	+	0
AS22	Residential led (Mixed-use)	+	-	0	+	0
AS24	Non-residential	0	-	0	0	0
AS26	Non-residential	0	-	0	0	0
CHR4	Residential led (Mixed-use)	+	+	+	+	++
HHH12	Residential led (Mixed-use)	0	-	+	+	0
HHH22	Residential led (Mixed-use)	0	+	+	+	0
HHH22/ HHH31	Residential led (Mixed-use)	-	-	+	-	0
HHH26	Residential led (Mixed-use)	+	-	+	+	0
HHH3	Residential led	0	-	+	+	0
HHH31	Residential led (Mixed-use)	0	++	+	+	0
HHH35	Non-residential	0	+	+	+	0
HHH36	Non-residential	0	-	+	0	0
HHH6	Residential led (Mixed-use)	0	-	0	0	0
HW1	Residential led	+	-	+	0	0
LW6	Residential led	+	-	+	0	++
LW8	Residential led	0	-	0	0	0
RN8	Residential led (Mixed-use)	+	+	0	+	++
RN9	Residential led	+	+	0	0	++
RSE10	Residential led (Mixed-use)	+	+	+	+	++
SMI5	Non-residential	+	+	+	+	++
SMI6	Residential led (Mixed-use)	+	+	+	+	++
SNF3	Residential led	+	+	0	0	0
SR17	Residential led (Mixed-use)	+	-	+	+	0
SR9	Residential led (Mixed-use)	0	-	+	+	0
SR53	Residential led (Mixed-use opportunity area)	+	+	+	+	0

Table I.3.23: *Non-strategic sites post-mitigation impact matrix for SA Objective 10 – Transport and accessibility*

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
AS1	Residential led	+	-	+	0	0
AS10	Residential led	0	-	0	0	0
AS11	Residential led (Mixed-use)	0	-	0	0	0
AS14	Residential led	+	-	0	+	0
AS15	Residential led	+	-	0	+	0

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
AS16	Residential led (Mixed-use)	+	-	+	+	0
AS17	Residential led	0	-	0	+	0
AS18	Residential led	+	-	0	0	0
AS2	Residential led	+	-	+	0	0
AS20	Residential led (Mixed-use)	+	-	+	+	0
AS23	Residential led (park homes)	+	-	0	+	0
AS25	Residential led	+	-	+	+	0
AS28	Residential led	+	-	0	0	0
AS29	Residential led	+	-	0	+	0
AS3	Residential led	+	-	+	0	0
AS5	Residential led (Mixed-use)	+	-	+	0	0
AS6	Residential led (Mixed-use)	+	-	+	0	0
AS7	Non-residential	+	-	0	0	0
AS8	Non-residential	0	-	0	0	0
AS9	Non-residential	0	-	0	0	0
CCB1	Residential led	+	+	+	+	++
CCB10	Residential led (Mixed-use)	+	+	+	+	++
CCB11	Residential led	+	+	+	+	++
CCB12	Residential led (Mixed-use)	+	+	+	+	++
CCB13	Residential led (Mixed-use)	+	+	+	+	++
CCB15	Residential led (Mixed-use)	+	+	+	+	++
CCB16	Residential led	+	+	+	+	++
CCB17	Residential led (Mixed-use)	+	+	+	+	++
CCB18	Residential led	+	+	+	+	++
CCB19	Residential led (Mixed-use)	+	+	+	+	++
CCB2	Residential led (Mixed-use)	+	+	+	+	++
CCB20	Residential led (Mixed-use)	+	+	+	+	++
CCB21	Residential led (Mixed-use)	+	+	+	+	++
CCB22	Residential led	+	+	+	0	++
CCB23	Residential led (Mixed-use)	+	+	+	+	++
CCB24	Residential led (Mixed-use)	+	+	+	+	++
CCB25	Residential led	+	+	+	+	++
CCB26	Residential led (Mixed-use)	+	+	+	+	++
CCB27	Residential led (Mixed-use)	+	+	+	+	++
CCB28	Residential led	+	+	+	+	++
CCB29	Residential led	+	+	+	+	++
CCB3	Residential led (Mixed-use)	+	+	+	+	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
CCB30	Residential led (Mixed-use)	+	+	+	+	++
CCB31	Residential led	+	+	+	+	++
CCB33	Residential led	+	+	+	+	++
CCB34	Residential led (Mixed-use)	+	+	+	+	++
CCB35	Non-residential	+	+	+	+	++
CCB36	Residential led (Mixed-use)	+	+	+	+	++
CCB37	Residential led (Mixed-use)	+	+	+	+	++
CCB38	Residential led	+	+	+	+	++
CCB39	Residential led	+	+	+	+	++
CCB4	Residential led	+	+	+	+	++
CCB40	Residential led	+	+	+	+	++
CCB41	Residential led	+	+	+	+	++
CCB43	Residential led	+	+	+	+	++
CCB44	Residential led	+	+	+	+	++
CCB46	Residential led	+	+	+	+	++
CCB48	Residential led	+	+	+	+	++
CCB49	Residential led	+	+	+	+	++
CCB5	Non-residential	+	+	+	+	++
CCB6	Residential led (Mixed-use)	+	+	+	+	++
CCB7	Residential led (Mixed-use)	+	+	+	+	++
CCB8	Residential led	+	+	+	+	++
CCB9	Residential led	+	+	+	+	++
CHR1	Residential led	+	+	0	0	0
CHR10	Residential led	+	+	+	+	++
CHR11	Residential led	+	+	+	+	0
CHR13	Residential led (Gypsy and Traveller)	+	+	0	0	0
CHR14	Residential led (Mixed-use)	+	+	0	0	0
CHR15	Non-residential	+	+	+	0	0
CHR16	Non-residential	+	+	0	0	0
CHR17	Non-residential	+	+	0	+	0
CHR18	Non-residential	+	+	+	+	0
CHR19	Non-residential	+	+	+	+	++
CHR2	Non-residential	0	+	0	0	0
CHR20	Residential led	0	+	0	+	0
CHR21	Non-residential	+	+	+	+	++
CHR3	Non-residential	0	+	+	0	0
CHR5	Non-residential	+	+	+	+	++
CHR6	Residential led	+	+	+	0	++
CHR7	Residential led	+	+	+	0	0
CHR8	Non-residential	+	+	+	0	++
FH1	Non-residential	+	-	+	+	++
FP1	Residential led	+	+	+	+	++
FP10	Residential led	+	+	+	+	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
FP11	Residential led (Mixed-use)	+	+	+	+	++
FP12	Residential led	+	+	+	+	++
FP14	Residential led	+	+	+	+	++
FP16	Residential led (Mixed-use)	+	+	+	+	++
FP17	Residential led	+	+	+	+	++
FP18	Residential led	+	+	+	+	++
FP19	Residential led	+	+	+	+	++
FP2	Residential led	+	+	+	+	++
FP22	Residential led	+	+	+	+	++
FP23	Residential led	+	+	+	+	++
FP25	Residential led (Mixed-use)	+	+	+	+	++
FP4	Residential led	+	+	+	+	++
FP5	Residential led	+	+	+	+	++
FP6	Residential led	+	+	+	+	++
FP7	Residential led	+	+	+	+	++
FP8	Residential led	+	+	+	+	++
FP9	Residential led	+	+	+	+	++
GN10	Residential led	+	+	+	+	0
GN11	Residential led	+	+	+	0	0
GN13	Residential led	+	+	+	+	0
GN14	Residential led	+	+	+	+	++
GN15	Residential led (Mixed-use)	+	+	+	+	++
GN3	Residential led	+	+	+	+	++
GN4	Residential led	+	+	+	+	++
GN5	Residential led	+	+	+	+	++
GN6	Residential led (Mixed-use)	+	+	+	+	++
GN8	Residential led	+	+	+	+	0
GS1	Residential led	+	+	+	+	++
GS10	Residential led (Mixed-use)	+	+	+	+	++
GS11	Residential led	+	+	+	+	++
GS12	Residential led (Mixed-use)	+	+	+	+	++
GS13	Residential led	+	+	+	+	++
GS14	Residential led (Mixed-use)	+	+	+	+	++
GS18	Residential led (Mixed-use)	+	+	+	+	++
GS19	Residential led	+	+	+	+	++
GS2	Residential led	+	+	+	+	++
GS20	Residential led	+	+	+	+	++
GS23	Residential led	+	+	+	+	++
GS24	Residential led	+	+	+	+	++
GS26	Residential led	+	+	+	+	++
GS27	Residential led (Mixed-use)	+	+	+	+	++
GS29	Residential led	+	+	+	+	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
GS30	Residential led	+	+	+	+	++
GS32	Residential led	+	+	+	+	++
GS33	Residential led	+	+	+	+	++
GS34	Residential led	+	+	+	+	++
GS35	Residential led	+	+	+	+	++
GS37	Residential led (Mixed-use)	+	+	+	+	++
GS4	Residential led	+	+	+	+	++
GS5	Residential led	+	+	+	+	++
GS6	Residential led	+	+	+	+	++
GS7	Residential led (Mixed-use)	+	+	+	+	++
GS8	Residential led (Mixed-use)	+	+	+	+	++
HHH1	Non-residential	0	-	0	0	0
HHH11	Residential led	0	-	+	0	0
HHH14	Residential led	+	-	+	+	0
HHH15	Residential led	0	-	0	0	0
HHH16	Non-residential	0	-	0	0	0
HHH17	Residential led	0	-	0	0	0
HHH18	Residential led (Mixed-use)	0	-	0	0	0
HHH19	Non-residential	0	-	0	+	0
HHH21	Non-residential	+	-	0	0	0
HHH23	Residential led (Mixed-use)	+	-	0	+	0
HHH24	Residential led	0	-	+	0	0
HHH25	Residential led	0	-	+	0	0
HHH28	Residential led (Mixed-use)	+	-	+	0	0
HHH29	Residential led (Mixed-use)	+	-	+	0	0
HHH30	Residential led (Mixed-use)	0	-	0	0	0
HHH32	Residential led	0	-	0	0	0
HHH33	Residential led	0	-	+	0	0
HHH37	Non-residential	0	-	0	0	0
HHH38	Non-residential	0	-	0	0	0
HHH39	Non-residential	0	-	0	0	0
HHH4	Residential led	+	-	+	+	0
HHH40	Residential led	0	-	0	0	0
HHH41	Residential led	0	-	+	0	0
HHH5	Residential led	+	-	0	+	0
HHH7	Residential led	0	-	0	0	0
HHH8	Residential led (Mixed-use)	+	-	+	0	0
HHH9	Residential led	+	-	+	0	0
HW11	Residential led	0	-	0	0	0
HW3	Residential and secondary school	+	-	0	+	++
HW5	Non-residential	+	-	+	+	++
HW6	Residential led	+	-	+	0	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
HW7	Residential or non-residential	+	-	+	0	0
HW8	Residential led	+	-	+	+	++
L11	Residential led	+	+	+	+	++
L12	Residential led	+	+	+	+	++
L2	Residential led	+	+	+	+	0
L3	Residential led	+	+	+	+	++
L7	Residential led	+	+	+	+	++
L9	Residential led	+	+	+	+	++
LW10	Residential led	+	-	0	+	0
LW2	Residential led	+	-	+	+	0
LW3	Residential led	+	-	+	+	++
LW4	Residential led	+	-	+	0	0
LW5	Residential led (C2 use)	+	-	+	+	++
LW7	Residential led	0	-	0	0	++
PP1	Residential led	+	-	+	0	0
REWW3	Residential led	+	+	+	+	++
RN1	Residential led	0	-	+	+	0
RN10	Residential led	+	+	+	0	0
RN11	Residential led	+	+	+	+	0
RN12	Non-residential	+	+	+	+	0
RN14	Residential led	+	+	+	0	0
RN16	Residential led	+	+	+	0	0
RN17	Residential led	+	+	0	0	0
RN18	Residential led	+	+	+	+	++
RN19	Residential led	+	+	+	0	0
RN2	Residential led (Mixed-use)	0	-	0	+	0
RN22	Residential led	+	+	+	+	++
RN23	Residential led	0	+	+	0	0
RN24	Residential led	+	+	+	+	++
RN25	Residential led	+	+	+	0	0
RN26	Residential led (Mixed-use)	0	-	0	0	0
RN27	Residential led	0	+	+	0	0
RN28	Residential led	+	+	+	+	0
RN29	Residential led	+	+	+	+	0
RN3	Residential led	+	+	+	+	++
RN30	Residential led	+	+	+	+	0
RN31	Residential led	0	+	0	+	0
RN32	Residential led	+	+	+	0	0
RN33	Non-residential	+	+	0	0	0
RN34	Residential led	+	+	+	+	0
RN4	Residential led (Mixed-use)	0	-	+	+	0
RN5	Residential led (Mixed-use)	+	-	+	0	0
RSE1	Non-residential	0	0	0	0	0
RSE11	Non-residential	+	+	+	+	0
RSE4	Residential led	+	-	0	0	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
RSE8	Residential led (Mixed-use)	0	+	0	0	0
RSE9	Residential led	+	+	0	+	0
RWB1	Residential led	+	+	+	+	0
RWB10	Non-residential	+	+	+	+	++
RWB11	Residential led	+	+	+	+	++
RWB12	Residential led	+	+	+	+	++
RWB14	Residential led	+	+	+	+	++
RWB15	Residential led	+	+	+	+	++
RWB17	Residential led	+	+	+	+	++
RWB18	Residential led	+	+	+	+	++
RWB19	Residential led (Mixed-use)	+	+	+	+	++
RWB2	Residential led	0	-	+	+	0
RWB20	Residential led	+	+	+	+	++
RWB21	Residential led	+	+	+	+	++
RWB23	Non-residential	+	+	+	+	++
RWB25	Residential led	+	+	+	+	++
RWB3	Residential led	+	+	+	+	0
RWB4	Residential led	+	+	+	+	0
RWB5	Non-residential	+	-	+	+	0
RWB6	Residential led	+	-	+	+	++
RWB8	Residential led (Mixed-use)	+	+	+	+	++
RWB9	Residential led (Mixed-use)	+	+	+	+	++
SMI1	Residential led	+	-	+	+	++
SMI2	Non-residential	+	+	+	+	++
SNF1	Residential led	+	-	+	+	0
SNF10	Residential led (Mixed-use)	+	+	+	+	++
SNF12	Residential led	+	+	+	+	0
SNF13	Residential led (Mixed-use)	+	+	+	+	++
SNF15	Residential led (Mixed-use)	+	+	+	+	++
SNF16	Residential led (Mixed-use)	+	+	+	+	++
SNF17	Residential led	+	+	+	+	++
SNF18	Residential led (Mixed-use)	+	+	+	+	++
SNF19	Non-residential	+	+	+	+	++
SNF2	Residential led (Mixed-use)	+	-	+	+	0
SNF20	Residential led	+	+	+	+	++
SNF21	Residential led (Mixed-use)	+	+	+	+	++
SNF22	Residential led (Mixed-use)	+	+	+	+	++
SNF23	Residential led (Mixed-use)	+	+	+	+	++
SNF24	Residential led (Mixed-use)	+	+	+	+	++
SNF25	Non-residential	+	+	+	+	++

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
SNF26	Non-residential	+	+	+	+	++
SNF27	Residential led	+	+	+	+	++
SNF28	Non-residential	+	+	+	+	++
SNF30	Residential led (Mixed-use)	+	+	+	+	++
SNF31	Residential led (Mixed-use)	+	+	+	+	++
SNF32	Residential led	+	+	+	+	++
SNF33	Non-residential	+	+	+	+	++
SNF34	Residential led (Mixed-use)	+	+	+	+	++
SNF35	Residential led (Mixed-use)	+	+	+	+	++
SNF36	Residential led (Mixed-use)	+	+	+	+	++
SNF37	Residential led (Mixed-use)	+	+	+	+	++
SNF38	Residential led	+	+	+	+	++
SNF39	Residential led	+	+	+	+	++
SNF41	Residential led (Mixed-use)	+	+	+	+	++
SNF43	Residential led	+	+	+	+	++
SNF44	Residential led	+	+	+	+	0
SNF5	Residential led	+	+	+	+	0
SNF6	Residential led	+	+	+	+	0
SNF8	Residential led (Mixed-use)	+	+	+	+	++
SNF9	Residential led (Mixed-use)	+	+	+	+	++
SR1	Residential led	0	+	0	0	0
SR10	Residential led	+	-	+	0	0
SR13	Residential led	+	+	+	0	0
SR14	Residential led	+	-	0	+	0
SR15	Residential led	+	+	+	0	0
SR16	Residential led	+	-	0	+	0
SR18	Residential led (Mixed-use)	+	-	0	+	0
SR2	Non-residential	0	-	0	0	0
SR21	Residential led	0	-	0	0	0
SR22	Residential led	+	-	+	0	0
SR24	Residential led	0	-	+	0	0
SR25	Residential led	+	+	+	+	0
SR27	Residential led	+	+	+	+	0
SR29	Non-residential	+	+	+	0	0
SR3	Residential led	+	+	0	0	0
SR30	Residential led (Mixed-use)	+	+	+	+	0
SR31	Residential led (Mixed-use)	+	+	+	0	0
SR32	Residential led (Mixed-use)	0	+	0	+	0
SR33	Non-residential	+	+	+	+	0
SR34	Residential led	+	+	0	+	0
SR35	Non-residential	+	+	+	+	0

Site ref.	Site use	Bus stop	Railway station	Pedestrian / cycle access	Local services	Public transport accessibility
SR36	Residential led (Mixed-use)	+	+	+	0	0
SR37	Residential led (Mixed-use)	+	+	0	0	0
SR38	Residential led (Mixed-use)	+	+	0	0	0
SR39	Residential led (Mixed-use)	+	+	0	+	0
SR4	Residential led	+	+	0	+	0
SR40	Residential led (Mixed-use)	+	+	0	0	0
SR41	Residential led (Mixed-use)	+	-	+	+	0
SR42	Residential led	0	-	+	0	0
SR43	Residential led	0	-	+	0	0
SR45	Non-residential	0	-	+	0	0
SR46	Residential led	0	-	0	0	0
SR47	Residential led	0	-	+	0	0
SR48	Residential led	0	-	+	0	0
SR49	Residential led	+	-	+	0	0
SR5	Residential led	+	+	+	0	0
SR50	Residential led	+	-	0	0	0
SR51	Residential led (Mixed-use)	+	-	+	+	0
SR52	Residential led (Mixed-use)	0	-	+	0	0
SR6	Residential led (Mixed-use)	0	-	0	0	0
SR7	Residential led	+	-	+	+	0
SR8	Residential led	+	-	+	0	0
SW1	Residential led	+	-	+	+	++
SW2	Residential led	+	-	+	+	++
SW3	Residential led	+	+	+	+	++
SW5	Residential led	+	+	+	+	++
SW6	Residential led	+	+	+	+	++
SW7	Residential led	+	+	+	+	++
SW8	Residential led	+	+	+	+	++
T1	Non-residential	+	-	+	+	0
T2	Residential led	+	-	+	+	++
T3	Residential led	+	+	+	+	++
W1	Residential led	+	+	+	+	++
W11	Non-residential	+	+	+	+	++
W12	Residential led	0	-	+	0	0
W13	Non-residential	+	-	+	+	++
W14	Non-residential	+	-	+	+	++
W3	Residential led	+	+	+	+	++
W4	Residential led	+	+	+	+	++
W7	Residential led	+	+	0	+	++
W8	Residential led	+	+	+	+	++

I.3.11 SA Objective 11: Education

Table I.3.24: Identified adverse effects and policy mitigation for SA11: Education

Identified adverse impact	Potential mitigating influence of MLP policies
Limited access to educational opportunities	Policy T12 (Learning and skills development) aims to support development that would create educational and childcare facilities where these have safe pedestrian access and there is an identified need for provision. This policy also supports the development of further educational facilities in Medway, as well as apprenticeship schemes and adult education. Policy T26 (Accessibility standards) requires that all major development proposals are located within a 15-minute walk to a primary school, or a 15-minute walk, cycle or bus to a secondary school. Policy T5 (Student accommodation) ensures that student housing is provided in appropriate and accessible locations for further educational use. Student accommodation must be well-served by walking, cycling and/or public transport provision. Various other policies (DM15, DM18, T10, T27, S15, S16 and S24) also aim to improve public transport, walking and cycling provision, which is likely to improve access to education. Policy DM18 (Transport assessments, transport statements and travel plans) seeks to ensure that the majority of new developments are supported by a Travel Plan, which is likely to improve pedestrian and public transport access to schools.

Limited access to education opportunities

I.3.11.1 The policies discussed within **Table I.3.24** are likely to improve access to education opportunities across the Plan area, and therefore are expected to provide sustainable access to educational provision within Medway, or minimise adverse effects for sites located at greater distances.

Table I.3.25: Strategic sites post-mitigation impact matrix for SA Objective 11 – Education

Site ref.	Site use	Primary school	Secondary school	Further education
AS13	Residential led (Mixed-use)	0	0	0
AS21	Residential led (Mixed-use)	+	0	0
AS22	Residential led (Mixed-use)	+	0	0
AS24	Non-residential	0	0	0
AS26	Non-residential	0	0	0
CHR4	Residential led (Mixed-use)	++	++	0
HHH12	Residential led (Mixed-use)	+	+	0
HHH22	Residential led (Mixed-use)	0	++	0
HHH22/HHH31	Residential led (Mixed-use)	+	++	0
HHH26	Residential led (Mixed-use)	+	0	0
HHH3	Residential led	+	0	0

Site ref.	Site use	Primary school	Secondary school	Further education
HHH31	Residential led (Mixed-use)	0	0	0
HHH35	Non-residential	0	0	0
HHH36	Non-residential	0	0	0
HHH6	Residential led (Mixed-use)	+	+	0
HW1	Residential led	0	0	0
LW6	Residential led	+	+	0
LW8	Residential led	0	0	0
RN8	Residential led (Mixed-use)	0	0	0
RN9	Residential led	+	++	0
RSE10	Residential led (Mixed-use)	+	+	0
SMI5	Non-residential	0	0	0
SMI6	Residential led (Mixed-use)	0	+	+
SNF3	Residential led	0	0	0
SR17	Residential led (Mixed-use)	+	+	0
SR9	Residential led (Mixed-use)	+	0	0
SR53	Residential led (Mixed-use opportunity area)	0	+	+

Table I.3.26: *Non-strategic site post-mitigation impact matrix for SA Objective 11 – Education*

Site ref.	Site use	Primary school	Secondary school	Further education
AS1	Residential led	0	0	0
AS10	Residential led	0	0	0
AS11	Residential led (Mixed-use)	0	0	0
AS14	Residential led	0	0	0
AS15	Residential led	0	0	0
AS16	Residential led (Mixed-use)	0	0	0
AS17	Residential led	0	0	0
AS18	Residential led	0	0	0
AS2	Residential led	0	0	0
AS20	Residential led (Mixed-use)	+	0	0
AS23	Residential led (park homes)	0	0	0
AS25	Residential led	+	0	0
AS28	Residential led	+	0	0
AS29	Residential led	0	0	0
AS3	Residential led	0	0	0
AS5	Residential led (Mixed-use)	0	0	0
AS6	Residential led (Mixed-use)	0	0	0
AS7	Non-residential	0	0	0
AS8	Non-residential	0	0	0
AS9	Non-residential	0	0	0
CCB1	Residential led	+	+	+
CCB10	Residential led (Mixed-use)	+	+	+
CCB11	Residential led	+	+	+
CCB12	Residential led (Mixed-use)	+	+	+

Site ref.	Site use	Primary school	Secondary school	Further education
CCB13	Residential led (Mixed-use)	+	+	+
CCB15	Residential led (Mixed-use)	+	+	+
CCB16	Residential led	+	+	+
CCB17	Residential led (Mixed-use)	+	+	+
CCB18	Residential led	+	+	+
CCB19	Residential led (Mixed-use)	+	+	+
CCB2	Residential led (Mixed-use)	+	+	+
CCB20	Residential led (Mixed-use)	+	+	+
CCB21	Residential led (Mixed-use)	+	+	+
CCB22	Residential led	+	+	+
CCB23	Residential led (Mixed-use)	+	+	+
CCB24	Residential led (Mixed-use)	+	+	+
CCB25	Residential led	0	+	+
CCB26	Residential led (Mixed-use)	+	+	+
CCB27	Residential led (Mixed-use)	+	+	+
CCB28	Residential led	+	+	+
CCB29	Residential led	+	+	+
CCB3	Residential led (Mixed-use)	+	+	+
CCB30	Residential led (Mixed-use)	+	+	+
CCB31	Residential led	+	+	+
CCB33	Residential led	+	+	+
CCB34	Residential led (Mixed-use)	+	+	+
CCB35	Non-residential	0	0	0
CCB36	Residential led (Mixed-use)	+	+	+
CCB37	Residential led (Mixed-use)	+	+	+
CCB38	Residential led	+	+	+
CCB39	Residential led	+	+	+
CCB4	Residential led	+	+	+
CCB40	Residential led	+	+	+
CCB41	Residential led	+	+	+
CCB43	Residential led	0	+	+
CCB44	Residential led	+	+	+
CCB46	Residential led	+	+	+
CCB48	Residential led	+	+	+
CCB49	Residential led	+	+	+
CCB5	Non-residential	0	0	0
CCB6	Residential led (Mixed-use)	+	+	+
CCB7	Residential led (Mixed-use)	+	+	+
CCB8	Residential led	+	+	+
CCB9	Residential led	+	+	+
CHR1	Residential led	0	0	0
CHR10	Residential led	+	0	0
CHR11	Residential led	+	0	0
CHR13	Residential led (Gypsy and Traveller)	0	0	0
CHR14	Residential led (Mixed-use)	0	0	0
CHR15	Non-residential	0	0	0
CHR16	Non-residential	0	0	0
CHR17	Non-residential	0	0	0
CHR18	Non-residential	0	0	0

Site ref.	Site use	Primary school	Secondary school	Further education
CHR19	Non-residential	0	0	0
CHR2	Non-residential	0	0	0
CHR20	Residential led	0	0	+
CHR21	Non-residential	0	0	0
CHR3	Non-residential	0	0	0
CHR5	Non-residential	0	0	0
CHR6	Residential led	0	0	0
CHR7	Residential led	0	0	0
CHR8	Non-residential	0	0	0
FH1	Non-residential	0	0	0
FP1	Residential led	+	+	+
FP10	Residential led	+	+	+
FP11	Residential led (Mixed-use)	+	+	+
FP12	Residential led	+	+	+
FP14	Residential led	+	+	+
FP16	Residential led (Mixed-use)	+	+	+
FP17	Residential led	+	+	+
FP18	Residential led	+	+	+
FP19	Residential led	+	+	+
FP2	Residential led	+	+	+
FP22	Residential led	+	+	+
FP23	Residential led	+	+	+
FP25	Residential led (Mixed-use)	+	+	+
FP4	Residential led	+	+	+
FP5	Residential led	+	+	+
FP6	Residential led	+	+	+
FP7	Residential led	+	+	+
FP8	Residential led	+	+	+
FP9	Residential led	+	+	+
GN10	Residential led	+	0	+
GN11	Residential led	+	+	+
GN13	Residential led	0	0	+
GN14	Residential led	+	+	+
GN15	Residential led (Mixed-use)	+	+	+
GN3	Residential led	+	+	+
GN4	Residential led	+	+	+
GN5	Residential led	+	+	+
GN6	Residential led (Mixed-use)	+	0	+
GN8	Residential led	+	+	+
GS1	Residential led	+	+	+
GS10	Residential led (Mixed-use)	+	+	+
GS11	Residential led	+	+	+
GS12	Residential led (Mixed-use)	+	+	+
GS13	Residential led	+	+	+
GS14	Residential led (Mixed-use)	+	+	+
GS18	Residential led (Mixed-use)	+	+	+
GS19	Residential led	+	+	+
GS2	Residential led	+	+	+
GS20	Residential led	+	+	+

Site ref.	Site use	Primary school	Secondary school	Further education
GS23	Residential led	+	+	+
GS24	Residential led	+	+	+
GS26	Residential led	+	+	+
GS27	Residential led (Mixed-use)	+	+	+
GS29	Residential led	+	+	+
GS30	Residential led	+	+	+
GS32	Residential led	+	+	+
GS33	Residential led	+	+	+
GS34	Residential led	+	+	+
GS35	Residential led	+	+	+
GS37	Residential led (Mixed-use)	+	+	+
GS4	Residential led	+	+	+
GS5	Residential led	+	+	+
GS6	Residential led	+	+	+
GS7	Residential led (Mixed-use)	+	+	+
GS8	Residential led (Mixed-use)	+	+	+
HHH1	Non-residential	0	0	0
HHH11	Residential led	+	+	0
HHH14	Residential led	0	+	0
HHH15	Residential led	+	0	0
HHH16	Non-residential	0	0	0
HHH17	Residential led	0	+	0
HHH18	Residential led (Mixed-use)	0	0	0
HHH19	Non-residential	0	0	0
HHH21	Non-residential	0	0	0
HHH23	Residential led (Mixed-use)	+	0	0
HHH24	Residential led	0	0	0
HHH25	Residential led	0	0	0
HHH28	Residential led (Mixed-use)	0	0	0
HHH29	Residential led (Mixed-use)	0	0	0
HHH30	Residential led (Mixed-use)	0	0	0
HHH32	Residential led	0	0	0
HHH33	Residential led	0	0	0
HHH37	Non-residential	0	0	0
HHH38	Non-residential	0	0	0
HHH39	Non-residential	0	0	0
HHH4	Residential led	+	+	0
HHH40	Residential led	0	0	0
HHH41	Residential led	+	+	0
HHH5	Residential led	+	0	0
HHH7	Residential led	0	+	0
HHH8	Residential led (Mixed-use)	+	+	0
HHH9	Residential led	+	+	0
HW11	Residential led	0	0	0
HW3	Residential and secondary school	0	++	0
HW5	Non-residential	0	0	0
HW6	Residential led	0	0	0
HW7	Residential or non-residential	0	0	0
HW8	Residential led	+	0	0

Site ref.	Site use	Primary school	Secondary school	Further education
L11	Residential led	+	+	+
L12	Residential led	+	+	+
L2	Residential led	+	+	+
L3	Residential led	+	+	+
L7	Residential led	+	+	+
L9	Residential led	+	+	+
LW10	Residential led	0	0	0
LW2	Residential led	+	+	0
LW3	Residential led	+	0	0
LW4	Residential led	0	0	0
LW5	Residential led (C2 use)	0	0	0
LW7	Residential led	0	0	0
PP1	Residential led	+	+	0
REWW3	Residential led	+	+	+
RN1	Residential led	0	0	+
RN10	Residential led	0	0	0
RN11	Residential led	+	+	0
RN12	Non-residential	0	0	0
RN14	Residential led	0	0	0
RN16	Residential led	0	+	0
RN17	Residential led	0	+	0
RN18	Residential led	+	+	0
RN19	Residential led	0	0	0
RN2	Residential led (Mixed-use)	0	0	+
RN22	Residential led	+	+	0
RN23	Residential led	+	+	0
RN24	Residential led	+	+	0
RN25	Residential led	+	+	0
RN26	Residential led (Mixed-use)	0	0	0
RN27	Residential led	+	+	0
RN28	Residential led	+	+	0
RN29	Residential led	+	+	0
RN3	Residential led	+	+	0
RN30	Residential led	+	+	0
RN31	Residential led	+	+	0
RN32	Residential led	0	+	0
RN33	Non-residential	0	0	0
RN34	Residential led	0	0	+
RN4	Residential led (Mixed-use)	0	0	+
RN5	Residential led (Mixed-use)	0	0	0
RSE1	Non-residential	0	0	0
RSE11	Non-residential	0	0	0
RSE4	Residential led	0	0	0
RSE8	Residential led (Mixed-use)	+	+	0
RSE9	Residential led	+	+	0
RWB1	Residential led	+	0	+
RWB10	Non-residential	0	0	0
RWB11	Residential led	+	+	+
RWB12	Residential led	+	+	+

Site ref.	Site use	Primary school	Secondary school	Further education
RWB14	Residential led	+	+	+
RWB15	Residential led	+	+	+
RWB17	Residential led	+	+	+
RWB18	Residential led	+	+	+
RWB19	Residential led (Mixed-use)	+	+	+
RWB2	Residential led	+	+	+
RWB20	Residential led	+	+	+
RWB21	Residential led	+	+	+
RWB23	Non-residential	0	0	0
RWB25	Residential led	+	0	+
RWB3	Residential led	+	+	+
RWB4	Residential led	+	+	+
RWB5	Non-residential	0	0	0
RWB6	Residential led	+	+	+
RWB8	Residential led (Mixed-use)	+	0	+
RWB9	Residential led (Mixed-use)	+	0	+
SMI1	Residential led	+	+	+
SMI2	Non-residential	0	0	0
SNF1	Residential led	0	+	0
SNF10	Residential led (Mixed-use)	+	+	+
SNF12	Residential led	+	+	0
SNF13	Residential led (Mixed-use)	+	0	+
SNF15	Residential led (Mixed-use)	+	+	+
SNF16	Residential led (Mixed-use)	+	+	+
SNF17	Residential led	+	+	+
SNF18	Residential led (Mixed-use)	+	0	+
SNF19	Non-residential	0	0	0
SNF2	Residential led (Mixed-use)	0	+	0
SNF20	Residential led	+	+	+
SNF21	Residential led (Mixed-use)	+	+	+
SNF22	Residential led (Mixed-use)	+	+	+
SNF23	Residential led (Mixed-use)	+	+	+
SNF24	Residential led (Mixed-use)	+	+	+
SNF25	Non-residential	0	0	0
SNF26	Non-residential	0	0	0
SNF27	Residential led	+	+	+
SNF28	Non-residential	0	0	0
SNF30	Residential led (Mixed-use)	+	+	+
SNF31	Residential led (Mixed-use)	+	+	+
SNF32	Residential led	0	+	+
SNF33	Non-residential	0	0	0
SNF34	Residential led (Mixed-use)	+	+	+
SNF35	Residential led (Mixed-use)	+	+	+
SNF36	Residential led (Mixed-use)	+	+	+
SNF37	Residential led (Mixed-use)	+	+	+
SNF38	Residential led	+	+	+
SNF39	Residential led	+	+	+
SNF41	Residential led (Mixed-use)	+	+	+
SNF43	Residential led	+	+	+

Site ref.	Site use	Primary school	Secondary school	Further education
SNF44	Residential led	+	+	0
SNF5	Residential led	+	+	+
SNF6	Residential led	0	+	+
SNF8	Residential led (Mixed-use)	+	0	+
SNF9	Residential led (Mixed-use)	+	0	+
SR1	Residential led	0	0	0
SR10	Residential led	0	0	0
SR13	Residential led	+	+	0
SR14	Residential led	+	0	0
SR15	Residential led	0	+	0
SR16	Residential led	+	0	0
SR18	Residential led (Mixed-use)	+	0	0
SR2	Non-residential	0	0	0
SR21	Residential led	+	0	0
SR22	Residential led	+	0	0
SR24	Residential led	+	0	0
SR25	Residential led	+	+	+
SR27	Residential led	0	+	+
SR29	Non-residential	0	0	0
SR3	Residential led	0	0	0
SR30	Residential led (Mixed-use)	0	+	+
SR31	Residential led (Mixed-use)	0	+	+
SR32	Residential led (Mixed-use)	+	+	+
SR33	Non-residential	0	0	0
SR34	Residential led	0	+	+
SR35	Non-residential	0	0	0
SR36	Residential led (Mixed-use)	0	+	+
SR37	Residential led (Mixed-use)	0	0	+
SR38	Residential led (Mixed-use)	0	0	+
SR39	Residential led (Mixed-use)	0	+	+
SR4	Residential led	0	0	0
SR40	Residential led (Mixed-use)	0	+	+
SR41	Residential led (Mixed-use)	+	0	0
SR42	Residential led	0	0	0
SR43	Residential led	0	0	0
SR45	Non-residential	0	0	0
SR46	Residential led	0	0	0
SR47	Residential led	0	0	+
SR48	Residential led	0	0	+
SR49	Residential led	+	0	0
SR5	Residential led	+	+	0
SR50	Residential led	+	+	0
SR51	Residential led (Mixed-use)	+	0	0
SR52	Residential led (Mixed-use)	0	0	0
SR6	Residential led (Mixed-use)	0	0	0
SR7	Residential led	0	0	0
SR8	Residential led	0	0	0
SW1	Residential led	+	+	0
SW2	Residential led	+	+	0

Site ref.	Site use	Primary school	Secondary school	Further education
SW3	Residential led	+	+	0
SW5	Residential led	+	+	0
SW6	Residential led	+	+	0
SW7	Residential led	+	+	+
SW8	Residential led	+	0	+
T1	Non-residential	0	0	0
T2	Residential led	+	0	0
T3	Residential led	+	+	0
W1	Residential led	+	+	+
W11	Non-residential	0	0	0
W12	Residential led	0	+	0
W13	Non-residential	0	0	0
W14	Non-residential	0	0	0
W3	Residential led	+	+	+
W4	Residential led	+	+	+
W7	Residential led	+	+	+
W8	Residential led	+	+	+

I.3.12 SA Objective 12: Economy and employment

Table I.3.27: *Identified adverse effects and policy mitigation for SA12: Economy and employment*

Identified adverse impact	Potential mitigating influence of MLP policies
Loss of employment floorspace	Policy S10 (Economic strategy) will *"seek to boost Medway's economic performance, securing a range of jobs for its workforce,"* which includes improving the range of employment sites within Medway, which is likely to compensate for any loss of employment floorspace from new development. Policy S15 (Town centres strategy) supports extended retail provision and the development of in-centre and edge of centre locations for employment provision outside of designated employment areas. Policy S11 (Existing employment provision) aims to safeguard existing employment sites from loss and redevelopment. The Spatial Development Strategy prioritises urban regeneration and aim to provide a broad range of employment opportunities at various locations within Medway. Policy S14 (Supporting Medway's culture and creative industries) seeks to expand cultural attractions and events within Medway, and Policy T13 (Tourism, culture and visitor accommodation) promotes development in the tourism sector, which are likely to provide employment opportunities within the cultural, creative and tourism industries. Policy T14 (Rural economy) supports the development of sustainable growth within rural areas, which is likely to provide employment opportunities for rural communities, whilst safeguarding existing employment sites located within rural areas. Policy T12 (Learning and skills development) aims to increase apprenticeship opportunities within Medway.

Loss of employment floorspace

I.3.12.1 The policies discussed within **Table I.3.27** are expected to mitigate the potential adverse impacts associated with limited access to employment provision across the Plan area, ensuring that current employment opportunities are safeguarded, whilst developing Medway as a hub for high quality employment opportunities. Any loss of existing employment floorspace will only be permitted where it is demonstrated to be no longer appropriate or viable in accordance with Policy S11.

Table I.3.28: *Strategic sites post-mitigation impact matrix for SA Objective 12 – Economy*

Site ref.	Site use	Employment floorspace provision	Access to major employment location
AS13	Residential led (Mixed-use)	0	+
AS21	Residential led (Mixed-use)	++	+
AS22	Residential led (Mixed-use)	++	+
AS24	Non-residential	0	0
AS26	Non-residential	0	0
CHR4	Residential led (Mixed-use)	++	+
HHH12	Residential led (Mixed-use)	++	+
HHH22	Residential led (Mixed-use)	++	+
HHH22/HHH31	Residential led (Mixed-use)	++	+
HHH26	Residential led (Mixed-use)	++	+
HHH3	Residential led	++	+
HHH31	Residential led (Mixed-use)	++	+
HHH35	Non-residential	++	0
HHH36	Non-residential	0	0
HHH6	Residential led (Mixed-use)	++	+
HW1	Residential led	++	+
LW6	Residential led	0	+
LW8	Residential led	++	+
RN8	Residential led (Mixed-use)	++	+
RN9	Residential led	++	+
RSE10	Residential led (Mixed-use)	++	+
SMI5	Non-residential	0	0
SMI6	Residential led (Mixed-use)	0	+
SNF3	Residential led	++	+
SR17	Residential led (Mixed-use)	++	+
SR9	Residential led (Mixed-use)	++	+
SR53	Residential led (Mixed-use opportunity area)	0	+

Table I.3.29: *Non-strategic sites post-mitigation impact matrix for SA Objective 12 – Economy and employment*

Site ref.	Site use	Employment floorspace provision	Access to major employment location
AS1	Residential led	0	+
AS10	Residential led	0	+
AS11	Residential led (Mixed-use)	0	+
AS14	Residential led	0	+
AS15	Residential led	0	+
AS16	Residential led (Mixed-use)	0	+
AS17	Residential led	0	+
AS18	Residential led	0	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
AS2	Residential led	0	+
AS20	Residential led (Mixed-use)	0	+
AS23	Residential led (park homes)	0	+
AS25	Residential led	0	+
AS28	Residential led	0	+
AS29	Residential led	0	+
AS3	Residential led	0	+
AS5	Residential led (Mixed-use)	0	+
AS6	Residential led (Mixed-use)	0	+
AS7	Non-residential	0	0
AS8	Non-residential	0	0
AS9	Non-residential	++	0
CCB1	Residential led	0	+
CCB10	Residential led (Mixed-use)	0	+
CCB11	Residential led	0	+
CCB12	Residential led (Mixed-use)	0	+
CCB13	Residential led (Mixed-use)	0	+
CCB15	Residential led (Mixed-use)	0	+
CCB16	Residential led	0	+
CCB17	Residential led (Mixed-use)	0	+
CCB18	Residential led	0	+
CCB19	Residential led (Mixed-use)	0	+
CCB2	Residential led (Mixed-use)	0	+
CCB20	Residential led (Mixed-use)	0	+
CCB21	Residential led (Mixed-use)	0	+
CCB22	Residential led	0	+
CCB23	Residential led (Mixed-use)	0	+
CCB24	Residential led (Mixed-use)	0	+
CCB25	Residential led	0	+
CCB26	Residential led (Mixed-use)	0	+
CCB27	Residential led (Mixed-use)	0	+
CCB28	Residential led	0	+
CCB29	Residential led	0	+
CCB3	Residential led (Mixed-use)	0	+
CCB30	Residential led (Mixed-use)	0	+
CCB31	Residential led	0	+
CCB33	Residential led	0	+
CCB34	Residential led (Mixed-use)	0	+
CCB35	Non-residential	++	0
CCB36	Residential led (Mixed-use)	0	+
CCB37	Residential led (Mixed-use)	0	+
CCB38	Residential led	0	+
CCB39	Residential led	0	+
CCB4	Residential led	0	+
CCB40	Residential led	0	+
CCB41	Residential led	0	+
CCB43	Residential led	0	+
CCB44	Residential led	0	+
CCB46	Residential led	0	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
CCB48	Residential led	0	+
CCB49	Residential led	0	+
CCB5	Non-residential	0	0
CCB6	Residential led (Mixed-use)	0	+
CCB7	Residential led (Mixed-use)	0	+
CCB8	Residential led	0	+
CCB9	Residential led	0	+
CHR1	Residential led	0	+
CHR10	Residential led	0	+
CHR11	Residential led	0	+
CHR13	Residential led (Gypsy and Traveller)	0	+
CHR14	Residential led (Mixed-use)	0	+
CHR15	Non-residential	++	0
CHR16	Non-residential	0	0
CHR17	Non-residential	++	0
CHR18	Non-residential	0	0
CHR19	Non-residential	0	0
CHR2	Non-residential	++	0
CHR20	Residential led	0	+
CHR21	Non-residential	0	0
CHR3	Non-residential	++	0
CHR5	Non-residential	++	0
CHR6	Residential led	0	+
CHR7	Residential led	0	+
CHR8	Non-residential	0	0
FH1	Non-residential	++	0
FP1	Residential led	0	+
FP10	Residential led	0	+
FP11	Residential led (Mixed-use)	0	+
FP12	Residential led	0	+
FP14	Residential led	0	+
FP16	Residential led (Mixed-use)	0	+
FP17	Residential led	0	+
FP18	Residential led	0	+
FP19	Residential led	0	+
FP2	Residential led	0	+
FP22	Residential led	0	+
FP23	Residential led	0	+
FP25	Residential led (Mixed-use)	0	+
FP4	Residential led	0	+
FP5	Residential led	0	+
FP6	Residential led	0	+
FP7	Residential led	0	+
FP8	Residential led	0	+
FP9	Residential led	0	+
GN10	Residential led	0	+
GN11	Residential led	0	+
GN13	Residential led	0	+
GN14	Residential led	0	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
GN15	Residential led (Mixed-use)	0	+
GN3	Residential led	0	+
GN4	Residential led	0	+
GN5	Residential led	0	+
GN6	Residential led (Mixed-use)	0	+
GN8	Residential led	0	+
GS1	Residential led	0	+
GS10	Residential led (Mixed-use)	0	+
GS11	Residential led	0	+
GS12	Residential led (Mixed-use)	0	+
GS13	Residential led	0	+
GS14	Residential led (Mixed-use)	0	+
GS18	Residential led (Mixed-use)	0	+
GS19	Residential led	0	+
GS2	Residential led	0	+
GS20	Residential led	0	+
GS23	Residential led	0	+
GS24	Residential led	0	+
GS26	Residential led	0	+
GS27	Residential led (Mixed-use)	0	+
GS29	Residential led	0	+
GS30	Residential led	0	+
GS32	Residential led	0	+
GS33	Residential led	0	+
GS34	Residential led	0	+
GS35	Residential led	0	+
GS37	Residential led (Mixed-use)	0	+
GS4	Residential led	0	+
GS5	Residential led	0	+
GS6	Residential led	0	+
GS7	Residential led (Mixed-use)	0	+
GS8	Residential led (Mixed-use)	0	+
HHH1	Non-residential	0	0
HHH11	Residential led	0	+
HHH14	Residential led	0	+
HHH15	Residential led	0	+
HHH16	Non-residential	0	0
HHH17	Residential led	0	+
HHH18	Residential led (Mixed-use)	0	+
HHH19	Non-residential	++	0
HHH21	Non-residential	0	0
HHH23	Residential led (Mixed-use)	0	+
HHH24	Residential led	0	+
HHH25	Residential led	0	+
HHH28	Residential led (Mixed-use)	0	+
HHH29	Residential led (Mixed-use)	0	+
HHH30	Residential led (Mixed-use)	0	+
HHH32	Residential led	0	+
HHH33	Residential led	0	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
HHH37	Non-residential	++	0
HHH38	Non-residential	++	0
HHH39	Non-residential	++	0
HHH4	Residential led	0	+
HHH40	Residential led	0	+
HHH41	Residential led	0	+
HHH5	Residential led	0	+
HHH7	Residential led	0	+
HHH8	Residential led (Mixed-use)	0	+
HHH9	Residential led	0	+
HW11	Residential led	0	+
HW3	Residential and secondary school	0	+
HW5	Non-residential	0	0
HW6	Residential led	0	+
HW7	Residential or non-residential	+/-	+
HW8	Residential led	0	+
L11	Residential led	0	+
L12	Residential led	0	+
L2	Residential led	0	+
L3	Residential led	0	+
L7	Residential led	0	+
L9	Residential led	0	+
LW10	Residential led	0	+
LW2	Residential led	0	+
LW3	Residential led	0	+
LW4	Residential led	0	+
LW5	Residential led (C2 use)	0	+
LW7	Residential led	0	+
PP1	Residential led	0	+
REWW3	Residential led	0	+
RN1	Residential led	0	+
RN10	Residential led	0	+
RN11	Residential led	0	+
RN12	Non-residential	++	0
RN14	Residential led	0	+
RN16	Residential led	0	+
RN17	Residential led	0	+
RN18	Residential led	0	+
RN19	Residential led	0	+
RN2	Residential led (Mixed-use)	0	+
RN22	Residential led	0	+
RN23	Residential led	0	+
RN24	Residential led	0	+
RN25	Residential led	0	+
RN26	Residential led (Mixed-use)	0	+
RN27	Residential led	0	+
RN28	Residential led	0	+
RN29	Residential led	0	+
RN3	Residential led	0	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
RN30	Residential led	0	+
RN31	Residential led	0	+
RN32	Residential led	0	+
RN33	Non-residential	++	0
RN34	Residential led	0	+
RN4	Residential led (Mixed-use)	0	+
RN5	Residential led (Mixed-use)	0	+
RSE1	Non-residential	0	0
RSE11	Non-residential	0	0
RSE4	Residential led	0	+
RSE8	Residential led (Mixed-use)	0	+
RSE9	Residential led	0	+
RWB1	Residential led	0	+
RWB10	Non-residential	0	0
RWB11	Residential led	0	+
RWB12	Residential led	0	+
RWB14	Residential led	0	+
RWB15	Residential led	0	+
RWB17	Residential led	0	+
RWB18	Residential led	0	+
RWB19	Residential led (Mixed-use)	0	+
RWB2	Residential led	0	+
RWB20	Residential led	0	+
RWB21	Residential led	0	+
RWB23	Non-residential	++	0
RWB25	Residential led	0	+
RWB3	Residential led	0	+
RWB4	Residential led	0	+
RWB5	Non-residential	++	0
RWB6	Residential led	0	+
RWB8	Residential led (Mixed-use)	0	+
RWB9	Residential led (Mixed-use)	0	+
SMI1	Residential led	0	+
SMI2	Non-residential	++	0
SNF1	Residential led	0	+
SNF10	Residential led (Mixed-use)	0	+
SNF12	Residential led	0	+
SNF13	Residential led (Mixed-use)	0	+
SNF15	Residential led (Mixed-use)	0	+
SNF16	Residential led (Mixed-use)	0	+
SNF17	Residential led	0	+
SNF18	Residential led (Mixed-use)	0	+
SNF19	Non-residential	0	0
SNF2	Residential led (Mixed-use)	0	+
SNF20	Residential led	0	+
SNF21	Residential led (Mixed-use)	0	+
SNF22	Residential led (Mixed-use)	0	+
SNF23	Residential led (Mixed-use)	0	+
SNF24	Residential led (Mixed-use)	0	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
SNF25	Non-residential	0	0
SNF26	Non-residential	++	0
SNF27	Residential led	0	+
SNF28	Non-residential	0	0
SNF30	Residential led (Mixed-use)	0	+
SNF31	Residential led (Mixed-use)	0	+
SNF32	Residential led	0	+
SNF33	Non-residential	0	0
SNF34	Residential led (Mixed-use)	0	+
SNF35	Residential led (Mixed-use)	0	+
SNF36	Residential led (Mixed-use)	0	+
SNF37	Residential led (Mixed-use)	0	+
SNF38	Residential led	0	+
SNF39	Residential led	0	+
SNF41	Residential led (Mixed-use)	0	+
SNF43	Residential led	0	+
SNF44	Residential led	0	+
SNF5	Residential led	0	+
SNF6	Residential led	0	+
SNF8	Residential led (Mixed-use)	0	+
SNF9	Residential led (Mixed-use)	0	+
SR1	Residential led	0	+
SR10	Residential led	0	+
SR13	Residential led	0	+
SR14	Residential led	0	+
SR15	Residential led	0	+
SR16	Residential led	0	+
SR18	Residential led (Mixed-use)	0	+
SR2	Non-residential	++	0
SR21	Residential led	0	+
SR22	Residential led	0	+
SR24	Residential led	0	+
SR25	Residential led	0	+
SR27	Residential led	0	+
SR29	Non-residential	++	0
SR3	Residential led	0	+
SR30	Residential led (Mixed-use)	0	+
SR31	Residential led (Mixed-use)	0	+
SR32	Residential led (Mixed-use)	0	+
SR33	Non-residential	0	0
SR34	Residential led	0	+
SR35	Non-residential	0	0
SR36	Residential led (Mixed-use)	0	+
SR37	Residential led (Mixed-use)	0	+
SR38	Residential led (Mixed-use)	0	+
SR39	Residential led (Mixed-use)	0	+
SR4	Residential led	0	+
SR40	Residential led (Mixed-use)	0	+
SR41	Residential led (Mixed-use)	0	+

Site ref.	Site use	Employment floorspace provision	Access to major employment location
SR42	Residential led	0	+
SR43	Residential led	0	+
SR45	Non-residential	++	0
SR46	Residential led	0	+
SR47	Residential led	0	+
SR48	Residential led	0	+
SR49	Residential led	0	+
SR5	Residential led	0	+
SR50	Residential led	0	+
SR51	Residential led (Mixed-use)	0	+
SR52	Residential led (Mixed-use)	0	+
SR6	Residential led (Mixed-use)	0	+
SR7	Residential led	0	+
SR8	Residential led	0	+
SW1	Residential led	0	+
SW2	Residential led	0	+
SW3	Residential led	0	+
SW5	Residential led	0	+
SW6	Residential led	0	+
SW7	Residential led	0	+
SW8	Residential led	0	+
T1	Non-residential	++	0
T2	Residential led	0	+
T3	Residential led	0	+
W1	Residential led	0	+
W11	Non-residential	++	0
W12	Residential led	0	+
W13	Non-residential	0	0
W14	Non-residential	++	0
W3	Residential led	0	+
W4	Residential led	0	+
W7	Residential led	0	+
W8	Residential led	0	+

I.4 Overall post-mitigation assessment

I.4.1 Overview

I.4.1.1 The overall impact matrix of all reasonable alternative site assessments post-mitigation is presented within **Tables I.4.1** and **I.4.2**. These impacts have been identified following consideration of the likely mitigation effects of the MLP policies as discussed in **Chapter I.3** and summarised in the corresponding tables.

Table I.4.1: *Impact matrix for all strategic reasonable alternative sites post-mitigation*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
AS13	Residential led (Mixed-use)	+/-	-	+/-	-	--	--	++	-	0	-	0	+
AS21	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
AS22	Residential led (Mixed-use)	+/-	-	+/-	-	--	--	++	-	0	-	+	++
AS24	Non-residential	+/-	-	--	-	--	-	0	-	0	-	0	0
AS26	Non-residential	+/-	-	--	-	--	-	0	-	0	-	0	0
CHR4	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	++	++	++
HHH12	Residential led (Mixed-use)	+/-	+	--	--	--	--	++	-	0	-	+	++
HHH22	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	+	++	++
HHH22/HHH31	Residential led (Mixed-use)	+/-	-	+/-	-	--	--	++	-	0	-	++	++
HHH26	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
HHH3	Residential led	+/-	+	--	-	--	--	++	-	0	-	+	++
HHH31	Residential led (Mixed-use)	+/-	-	+/-	-	--	--	++	-	0	++	0	++
HHH35	Non-residential	+/-	-	+/-	-	--	--	0	-	0	+	0	++
HHH36	Non-residential	+/-	-	--	-	--	-	0	-	0	-	0	0
HHH6	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
HW1	Residential led	+/-	+	+/-	-	--	-	++	-	0	-	0	++
LW6	Residential led	+/-	+	+/-	-	--	--	++	-	0	-	+	+
LW8	Residential led	+/-	+	+/-	-	--	--	++	-	0	-	0	++
RN8	Residential led (Mixed-use)	+/-	+	+/-	-	--	-	++	-	0	++	0	++
RN9	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	+	0	++	++	++

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
RSE10	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	++	+	++
SMI5	Non-residential	+/-	-	-	-	--	+	0	+	0	++	0	0
SMI6	Residential led (Mixed-use)	+/-	-	-	-	--	+	++	+	0	++	+	+
SNF3	Residential led	+/-	+	+/-	-	--	--	++	-	0	+	0	++
SR17	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
SR9	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
SR53	Residential led (Mixed-use opportunity area)	+/-	+/-	-	+/-	--	-	++	-	0	+	+	+

Table I.4.2: *Impact matrix for all non-strategic reasonable alternative sites post-mitigation*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
AS1	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS10	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS11	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS14	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS15	Residential led	+/-	-	+/-	-	-	-	+	-	0	-	0	+
AS16	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	-	0	-	0	+
AS17	Residential led	+/-	-	+/-	-	-	-	++	-	0	-	0	+
AS18	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS2	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS20	Residential led (Mixed-use)	+/-	+	+/-	-	-	--	++	-	0	-	+	+
AS23	Residential led (park homes)	+/-	+	+/-	-	+/-	-	+	-	0	-	0	+
AS25	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
AS28	Residential led	+/-	-	-	-	-	-	+	-	0	-	+	+
AS29	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	-	0	+
AS3	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS5	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	0	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
AS6	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS7	Non-residential	+/-	+	+/-	-	-	+	0	-	0	-	0	0
AS8	Non-residential	+/-	+	+/-	-	-	-	0	-	0	-	0	0
AS9	Non-residential	+/-	-	+/-	-	-	--	0	-	0	-	0	++
CCB1	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
CCB10	Residential led (Mixed-use)	+/-	+	+/-	-	-	+	+	-	0	++	+	+
CCB11	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB12	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
CCB13	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
CCB15	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB16	Residential led	+/-	-	+/-	+/-	-	-	+	+	0	++	+	+
CCB17	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB18	Residential led	+/-	+	+/-	+/-	-	-	++	+	0	++	+	+
CCB19	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB2	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
CCB20	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB21	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB22	Residential led	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB23	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB24	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB25	Residential led	+/-	-	-	-	-	+	++	-	0	++	+	+
CCB26	Residential led (Mixed-use)	+/-	-	+/-	-	-	+	+	+	0	++	+	+
CCB27	Residential led (Mixed-use)	+/-	-	+/-	-	-	+	+	+	0	++	+	+
CCB28	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
CCB29	Residential led	+/-	+	+/-	-	-	-	+	-	0	++	+	+
CCB3	Residential led (Mixed-use)	+/-	+	+/-	-	-	+	+	-	0	++	+	+
CCB30	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
CCB31	Residential led	+/-	-	+/-	+/-	-	-	++	+	0	++	+	+
CCB33	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB34	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB35	Non-residential	+/-	-	+/-	-	-	-	0	+	0	++	0	++
CCB36	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
CCB37	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	++	+	0	++	+	+
CCB38	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB39	Residential led	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
CCB4	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
CCB40	Residential led	+/-	+	+/-	-	-	-	+	-	0	++	+	+
CCB41	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
CCB43	Residential led	+/-	-	+/-	+/-	-	-	+	-	0	++	+	+
CCB44	Residential led	+/-	+	+/-	-	-	+	+	+	0	++	+	+
CCB46	Residential led	+/-	+	+/-	-	-	+	+	+	0	++	+	+
CCB48	Residential led	+/-	+	+/-	-	-	-	+	+	0	++	+	+
CCB49	Residential led	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
CCB5	Non-residential	+/-	-	-	-	-	-	0	-	0	++	0	0
CCB6	Residential led (Mixed-use)	+/-	+	+/-	-	-	+	+	-	0	++	+	+
CCB7	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	-	+	+	0	++	+	+
CCB8	Residential led	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
CCB9	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
CHR1	Residential led	+/-	+	+/-	-	-	+	+	-	0	+	0	+
CHR10	Residential led	+/-	+	+/-	-	-	-	+	-	0	++	+	+
CHR11	Residential led	+/-	+	+/-	-	-	+	+	-	0	+	+	+
CHR13	Residential led (Gypsy and Traveller)	+/-	+	+/-	-	-	-	+	-	0	+	0	+
CHR14	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	+	0	+
CHR15	Non-residential	+/-	+	+/-	+/-	-	+	0	-	0	+	0	++
CHR16	Non-residential	+/-	+	+/-	-	-	-	0	-	0	+	0	0
CHR17	Non-residential	+/-	+	+/-	+/-	-	-	0	-	0	+	0	++
CHR18	Non-residential	+/-	+	+/-	-	-	+	0	-	0	+	0	0
CHR19	Non-residential	+/-	+	+/-	+/-	-	+	0	+	0	++	0	0
CHR2	Non-residential	+/-	+	-	-	-	-	0	-	0	+	0	++
CHR20	Residential led	+/-	-	+/-	-	-	-	++	-	0	+	+	+
CHR21	Non-residential	+/-	-	+/-	+/-	-	+	0	+	0	++	0	0
CHR3	Non-residential	+/-	+	--	-	-	-	0	-	0	+	0	++
CHR5	Non-residential	+/-	+	+/-	-	-	-	0	-	0	++	0	++
CHR6	Residential led	+/-	+	+/-	-	-	+	+	-	0	++	0	+
CHR7	Residential led	+/-	+	+/-	-	-	-	++	-	0	+	0	+
CHR8	Non-residential	+/-	-	+/-	+/-	-	+	0	-	0	++	0	0
FH1	Non-residential	+/-	+	+/-	-	-	+	0	-	0	-	0	++
FP1	Residential led	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
FP10	Residential led	+/-	+	+/-	-	-	-	++	-	0	++	+	+
FP11	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	++	-	0	++	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
FP12	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
FP14	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
FP16	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
FP17	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
FP18	Residential led	+/-	-	+/-	-	-	+	+	-	0	++	+	+
FP19	Residential led	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
FP2	Residential led	+/-	-	+/-	+/-	-	+	+	-	0	++	+	+
FP22	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
FP23	Residential led	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
FP25	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	-	++	-	0	++	+	+
FP4	Residential led	+/-	-	+/-	+/-	-	+	+	-	0	++	+	+
FP5	Residential led	+/-	-	-	+/-	-	+	+	-	0	++	+	+
FP6	Residential led	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
FP7	Residential led	+/-	-	+/-	+/-	-	+	+	-	0	++	+	+
FP8	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
FP9	Residential led	+/-	-	-	+/-	-	+	+	-	0	++	+	+
GN10	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
GN11	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	+	+	+
GN13	Residential led	+/-	-	-	+/-	-	-	+	-	0	+	+	+
GN14	Residential led	+/-	-	+/-	-	-	+	+	+	0	++	+	+
GN15	Residential led (Mixed-use)	+/-	-	-	-	-	+	++	-	0	++	+	+
GN3	Residential led	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
GN4	Residential led	+/-	-	+/-	-	-	+	+	+	0	++	+	+
GN5	Residential led	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
GN6	Residential led (Mixed-use)	+/-	-	-	-	-	-	++	+	0	++	+	+
GN8	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	+	+	+
GS1	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS10	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS11	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS12	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS13	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS14	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS18	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS19	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS2	Residential led	+/-	+	+/-	-	-	-	+	+	0	++	+	+
GS20	Residential led	+/-	+	+/-	+/-	+/-	+	+	+	0	++	+	+
GS23	Residential led	+/-	+	+/-	+/-	+/-	+	+	+	0	++	+	+
GS24	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
GS26	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS27	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS29	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS30	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS32	Residential led	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
GS33	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
GS34	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS35	Residential led	+/-	+	+/-	-	-	+	+	-	0	++	+	+
GS37	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	++	+	0	++	+	+
GS4	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS5	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS6	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS7	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS8	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
HHH1	Non-residential	+/-	+	-	--	-	-	0	-	0	-	0	0
HHH11	Residential led	+/-	+	+/-	-	-	-	++	-	0	-	+	+
HHH14	Residential led	+/-	+	+/-	-	-	-	++	-	0	-	+	+
HHH15	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
HHH16	Non-residential	+/-	+	+/-	-	-	-	0	-	0	-	0	0
HHH17	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
HHH18	Residential led (Mixed-use)	+/-	+	+/-	--	-	--	+/-	-	0	-	0	+
HHH19	Non-residential	+/-	+	+/-	-	-	-	0	-	0	-	0	++
HHH21	Non-residential	+/-	-	+/-	+/-	-	+	0	-	0	-	0	0
HHH23	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	+	+
HHH24	Residential led	+/-	+	+/-	-	-	-	++	-	0	-	0	+
HHH25	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HHH28	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HHH29	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HHH30	Residential led (Mixed-use)	+/-	-	+/-	-	-	-	+	-	0	-	0	+
HHH32	Residential led	+/-	-	+/-	--	+/-	-	+	-	0	-	0	+
HHH33	Residential led	+/-	+	+/-	-	-	--	++	-	0	-	0	+
HHH37	Non-residential	+/-	-	+/-	0	-	-	0	-	0	-	0	++
HHH38	Non-residential	+/-	-	+/-	0	-	-	0	-	0	-	0	++
HHH39	Non-residential	+/-	+	+/-	0	-	-	0	-	0	-	0	++
HHH4	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	-	+	+
HHH40	Residential led	+/-	+	-	-	-	-	+	-	0	-	0	+
HHH41	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
HHH5	Residential led	+/-	+	-	--	-	-	+	-	0	-	+	+
HHH7	Residential led	+/-	+	--	--	-	--	++	-	0	-	+	+
HHH8	Residential led (Mixed-use)	+/-	+	+/-	-	-	--	++	-	0	-	+	+
HHH9	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
HW11	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HW3	Residential and secondary school	+/-	+	+/-	-	-	--	++	-	0	-	0	+
HW5	Non-residential	+/-	+	+/-	-	-	+	0	-	0	-	0	0
HW6	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HW7	Residential or non-residential	+/-	+	+/-	-	-	-	+/-	-	0	-	0	+/-
HW8	Residential led	+/-	+	+/-	+/-	+/-	-	+	-	0	-	+	+
L11	Residential led	+/-	+	+/-	-	-	-	+	-	0	++	+	+
L12	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
L2	Residential led	+/-	+	+/-	+/-	+/-	-	+	-	0	+	+	+
L3	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
L7	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
L9	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
LW10	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	-	0	+
LW2	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
LW3	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	-	+	+
LW4	Residential led	+/-	+	+/-	-	-	--	++	-	0	-	0	+
LW5	Residential led (C2 use)	+/-	+	+/-	+/-	+/-	+	+	-	0	-	0	+
LW7	Residential led	+/-	+	+/-	-	-	--	++	-	0	-	0	+
PP1	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
REWW 3	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RN1	Residential led	+/-	-	+/-	-	-	-	++	-	0	-	+	+
RN10	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	0	+
RN11	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN12	Non-residential	+/-	+	+/-	-	-	-	0	-	0	+	0	++
RN14	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	0	+
RN16	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN17	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN18	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RN19	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	+	0	+
RN2	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	++	-	0	-	+	+
RN22	Residential led	+/-	+	+/-	+/-	+/-	-	+	-	0	++	+	+
RN23	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN24	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RN25	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	+	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
RN26	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	0	+
RN27	Residential led	+/-	+	+/-	-	-	-	++	-	0	+	+	+
RN28	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN29	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	+	+	+
RN3	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
RN30	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN31	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN32	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN33	Non-residential	+/-	+	+/-	-	-	-	0	-	0	+	0	++
RN34	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN4	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	++	-	0	-	+	+
RN5	Residential led (Mixed-use)	+/-	+	+/-	-	-	--	++	-	0	-	0	+
RSE1	Non-residential	+/-	+	+/-	+/-	-	-	0	0	0	0	0	0
RSE11	Non-residential	+/-	+	+/-	-	-	+	0	-	0	+	0	0
RSE4	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
RSE8	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RSE9	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RWB1	Residential led	+/-	+	-	-	-	-	+	-	0	+	+	+
RWB10	Non-residential	+/-	+	+/-	+/-	-	+	0	-	0	++	0	0
RWB11	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB12	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB14	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB15	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB17	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB18	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB19	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
RWB2	Residential led	+/-	-	-	-	-	-	+	-	0	-	+	+
RWB20	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB21	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB23	Non-residential	+/-	+	+/-	+/-	-	-	0	-	0	++	0	++
RWB25	Residential led	+/-	-	-	-	-	+	++	-	0	++	+	+
RWB3	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	+	+	+
RWB4	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	+	+	+
RWB5	Non-residential	+/-	+	+/-	-	-	-	0	-	0	-	0	++
RWB6	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	-	+	+
RWB8	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB9	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
SMI1	Residential led	+/-	-	+/-	-	-	+	++	+	0	-	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
SMI2	Non-residential	+/-	-	+/-	+/-	-	+	0	-	0	++	0	++
SNF1	Residential led	+/-	+	+/-	-	-	-	++	-	0	-	+	+
SNF10	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
SNF12	Residential led	+/-	+	+/-	+/-	+/-	-	+	-	0	+	+	+
SNF13	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
SNF15	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
SNF16	Residential led (Mixed-use)	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
SNF17	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
SNF18	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF19	Non-residential	+/-	+	+/-	+/-	-	+	0	+	0	++	0	0
SNF2	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	+	+
SNF20	Residential led	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
SNF21	Residential led (Mixed-use)	+/-	-	+/-	-	-	+	+	+	0	++	+	+
SNF22	Residential led (Mixed-use)	+/-	-	+/-	-	-	+	+	+	0	++	+	+
SNF23	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF24	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF25	Non-residential	+/-	-	+/-	-	-	+	0	+	0	++	0	0
SNF26	Non-residential	+/-	-	-	+/-	-	-	0	+	0	++	0	++
SNF27	Residential led	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
SNF28	Non-residential	+/-	-	+/-	+/-	-	+	0	-	0	++	0	0
SNF30	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF31	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF32	Residential led	+/-	-	+/-	+/-	-	-	+	+	0	++	+	+
SNF33	Non-residential	+/-	-	+/-	+/-	-	+	0	+	0	++	0	0
SNF34	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF35	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	++	-	0	++	+	+
SNF36	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	-	+	+	0	++	+	+
SNF37	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	-	+	+	0	++	+	+
SNF38	Residential led	+/-	-	+/-	-	-	-	+	+	0	++	+	+
SNF39	Residential led	+/-	-	+/-	+/-	-	-	+/-	+	0	++	+	+
SNF41	Residential led (Mixed-use)	+/-	-	-	-	-	+	++	+	0	++	+	+
SNF43	Residential led	+/-	-	+/-	-	-	-	++	-	0	++	+	+
SNF44	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	+	+	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
SNF5	Residential led	+/-	+	+/-	-	-	-	+	+	0	+	+	+
SNF6	Residential led	+/-	+	+/-	+/-	-	-	+	+	0	+	+	+
SNF8	Residential led (Mixed-use)	+/-	+	+/-	-	-	+	+	+	0	++	+	+
SNF9	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	+	0	++	+	+
SR1	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	0	+
SR10	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
SR13	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
SR14	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
SR15	Residential led	+/-	+	+/-	-	-	-	+	-	0	+	+	+
SR16	Residential led	+/-	+	+/-	-	-	-	++	-	0	-	+	+
SR18	Residential led (Mixed-use)	+/-	+	+/-	-	-	-	+	-	0	-	+	+
SR2	Non-residential	+/-	+	--	-	-	--	0	-	0	-	0	++
SR21	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
SR22	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	-	+	+
SR24	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
SR25	Residential led	+/-	+	+/-	--	-	-	++	-	0	+	+	+
SR27	Residential led	+/-	+	+/-	--	-	-	+	-	0	+	+	+
SR29	Non-residential	+/-	-	+/-	+/-	-	-	0	-	0	+	0	++
SR3	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	+	0	+
SR30	Residential led (Mixed-use)	+/-	-	+/-	+/-	-	+	++	-	0	+	+	+
SR31	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	++	-	0	+	+	+
SR32	Residential led (Mixed-use)	+/-	+	-	--	-	-	+	-	0	+	+	+
SR33	Non-residential	+/-	-	+/-	+/-	-	+	0	-	0	+	0	0
SR34	Residential led	+/-	-	+/-	+/-	-	+	+	-	0	+	+	+
SR35	Non-residential	+/-	-	+/-	+/-	-	+	0	-	0	+	0	0
SR36	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	++	-	0	+	+	+
SR37	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	++	-	0	+	+	+
SR38	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	++	-	0	+	+	+
SR39	Residential led (Mixed-use)	+/-	-	-	--	-	-	++	-	0	+	+	+
SR4	Residential led	+/-	+	+/-	-	-	-	++	-	0	+	0	+
SR40	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	++	-	0	+	+	+
SR41	Residential led (Mixed-use)	+/-	+	-	--	-	-	+	-	0	-	+	+
SR42	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
SR43	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
SR45	Non-residential	+/-	+	+/-	-	-	-	0	-	0	-	0	++
SR46	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Site use**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
SR47	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	-	+	+
SR48	Residential led	+/-	-	-	-	-	+	+	-	0	-	+	+
SR49	Residential led	+/-	-	-	-	-	-	+	-	0	-	+	+
SR5	Residential led	+/-	+	+/-	-	-	-	++	-	0	+	+	+
SR50	Residential led	+/-	-	-	-	-	+	+	-	0	-	+	+
SR51	Residential led (Mixed-use)	+/-	+	-	-	-	--	++	-	0	-	+	+
SR52	Residential led (Mixed-use)	+/-	+	-	-	-	--	++	-	0	-	0	+
SR6	Residential led (Mixed-use)	+/-	+	-	-	-	-	++	-	0	-	0	+
SR7	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
SR8	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	0	+
SW1	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	-	+	+
SW2	Residential led	+/-	+	+/-	+/-	-	-	++	-	0	-	+	+
SW3	Residential led	+/-	+	+/-	+/-	+/-	+	+	-	0	++	+	+
SW5	Residential led	+/-	+	+/-	+/-	+/-	+	+	-	0	++	+	+
SW6	Residential led	+/-	+	+/-	+/-	+/-	-	+	+	0	++	+	+
SW7	Residential led	+/-	+	+/-	+/-	+/-	-	+	-	0	++	+	+
SW8	Residential led	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
T1	Non-residential	+/-	+	+/-	-	-	-	0	-	0	-	0	++
T2	Residential led	+/-	+	+/-	-	-	-	+	-	0	-	+	+
T3	Residential led	+/-	+	+/-	-	-	-	+	+	0	++	+	+
W1	Residential led	+/-	+	+/-	+/-	+/-	-	+	+	0	++	+	+
W11	Non-residential	+/-	+	+/-	-	-	-	0	-	0	++	0	++
W12	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	-	+	+
W13	Non-residential	+/-	+	+/-	+/-	-	-	0	-	0	-	0	0
W14	Non-residential	+/-	+	+/-	+/-	-	+	0	+	0	-	0	++
W3	Residential led	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
W4	Residential led	+/-	+	+/-	+/-	+/-	+	+	+	0	++	+	+
W7	Residential led	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
W8	Residential led	+/-	+	+/-	-	+/-	-	+	-	0	++	+	+

Appendix J – Reasons for Selection and Rejection of Reasonable Alternative Sites

Appendix J Tables

Table J.1.1: Outline reasons for selection and rejection of reasonable alternative strategic sites J1
Table J.1.2: Outline reasons for selection and rejection of non-strategic reasonable alternative sites J3

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J.1 Selected and rejected sites

J.1.1.1 **Tables J.1.1** and **J.1.2** list all reasonable alternative strategic and non-strategic sites that have been evaluated throughout the SA process, and indicates which have been:

1. **Selected** – i.e. the reasonable alternative sites that have been chosen as preferred sites for allocation by Medway Council and are set out in the Regulation 19 version of the Medway Local Plan (MLP); or
2. **Rejected** – i.e. the reasonable alternative sites that have been considered as part of the SA process but are not preferred sites for allocation in the MLP. 'Rejected' sites also include those that are already under construction or have been completed, and as such cannot be allocated through the MLP.

J.1.1.2 The outline reasons for selecting or rejecting each of the reasonable alternative sites, as set out in **Tables J.1.1** and **J.1.2** below, have been provided by Medway Council and are reflective of the Council's consideration of the iterative SA findings as well as other evidence base information.

Table J.1.1: *Outline reasons for selection and rejection of reasonable alternative strategic sites*

Strategic site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
AS13	Residential led (Mixed-use)	Rejected	Potential adverse impact on greenspace. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Beyond reasonable walking distance to current public transport services.
AS21	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Neighbourhood plan emerging.
AS22	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Neighbourhood plan emerging.
AS24	Non-residential	Selected (designated as Existing Employment Area)	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Existing employment area. Principle of development established through planning consent.
AS26	Non-residential	Selected (designated as Existing Employment Area)	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Existing employment area.
CHR4	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. Within the Green Belt. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Local impacts associated with consented Lower Thames Crossing noted in this location.
HHH12	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH22 & HHH31	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH26	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH3	Residential led	Rejected	Uncertainty regarding ecological impacts.

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Strategic site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
HHH35	Non-residential	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
HHH36	Non-residential	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
HHH6	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HW1	Residential led	Rejected	Encroaches on Ancient Woodland. Potential adverse impact on Local Nature Reserve. Potential loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
LW6	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
LW8	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
RN8	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Potential adverse impact on Conservation Area.
RN9	Residential led (Mixed-use)	Selected	Following Regulation 18b consultation, site promoter has demonstrated how concerns and constraints could be addressed.
RSE10	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Noted Swale Borough Council's concerns at Regulation 18b. Incompatible with spatial strategy.
SMI5	Non-residential	Rejected	Potential adverse impact on greenspace.
SMI6	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF3	Residential led	Selected	The site could overcome constraints following Duty to Cooperate engagement with Gravesham Borough Council, Green Belt Review and emerging public transport study. NPPF Green Belt release exceptional circumstances met.
SR17	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Beyond reasonable walking distance to current public transport services.
SR53	Residential led (Mixed-use)	Selected	Noted Environment Agency's comments at Regulation 18b. Noted commentary in Employment Land Needs Assessment. Opportunity for strategic approach to managing flood risk. Requires comprehensive masterplan. Phased from Year 11.
SR9	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.

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Table J.1.2: *Outline reasons for selection and rejection of non-strategic reasonable alternative sites*

Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
AS1	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
AS10	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development, supporting improved services.
AS11	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS14	Residential led	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Neighbourhood plan emerging.
AS15	Residential led	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Neighbourhood plan emerging.
AS16	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Neighbourhood plan emerging.
AS17	Residential led	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Neighbourhood plan emerging.
AS18	Residential led	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Neighbourhood plan emerging.
AS2	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS20	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
AS23	Residential led (park homes)	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Neighbourhood plan emerging.
AS25	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS28	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS29	Residential led	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Neighbourhood plan emerging.
AS3	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
AS5	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
AS6	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS7	Non-residential	Rejected	Principle of development established through planning consent. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
AS8	Non-residential	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
AS9	Non-residential	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
CCB1	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB10	Residential led (Mixed-use)	Rejected	Unavailable.
CCB11	Residential led	Rejected	Unavailable.
CCB12	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB13	Residential led (Mixed-use)	Rejected	Unavailable.
CCB15	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB16	Residential led	Rejected	Unavailable.
CCB17	Residential led (Mixed-use)	Rejected	Under construction.
CCB18	Residential led	Rejected	Unavailable.
CCB19	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB2	Residential led (Mixed-use)	Rejected	Potential adverse impact on listed building. Unavailable.
CCB20	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB21	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
			location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB22	Residential led	Rejected	Unavailable.
CCB23	Residential led (Mixed-use)	Rejected	Unavailable.
CCB24	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB25	Residential led (Mixed-use)	Selected	In line with development brief, capable of overcoming constraints following engagement with Chatham Historic Dockyard Trust and Homes England.
CCB26	Residential led (Mixed-use)	Rejected	Unavailable.
CCB27	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB28	Residential led	Rejected	Unavailable.
CCB29	Residential led	Rejected	Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Unavailable.
CCB3	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB30	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB31	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB33	Residential led	Rejected	Unavailable.
CCB34	Residential led (Mixed-use)	Rejected	Unavailable.
CCB35	Non-residential	Selected	In line with development brief, capable of overcoming constraints following engagement with Chatham Historic Dockyard Trust and Homes England.
CCB36	Residential led (Mixed-use)	Rejected	Unavailable.
CCB37	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB38	Residential led	Rejected	Under construction.
CCB39	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB4	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location,

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
			making best use of PDL and potential improvement to urban form through redevelopment.
CCB40	Residential led	Rejected	Potential adverse impact on Conservation Area. Unavailable.
CCB41	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB43	Residential led	Rejected	Under construction.
CCB44	Residential led	Rejected	Unavailable.
CCB46	Residential led	Rejected	Unavailable.
CCB48	Residential led	Rejected	Potential adverse impact on greenspace. Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Unavailable.
CCB49	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB5	Non-residential	Rejected	Potential adverse impact on greenspace. Potential adverse impact on listed building. Potential adverse impact on Schedule Monument. Potential adverse impact on Conservation Area. Unavailable.
CCB6	Residential led (Mixed-use)	Rejected	Unavailable.
CCB7	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB8	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB9	Residential led	Rejected	Under construction.
CHR1	Residential led	Rejected	Potential loss of BMV agricultural land. Within the Green Belt. Within Kent Downs National Landscape. Beyond reasonable walking distance to current public transport services. Local impacts associated with consented Lower Thames Crossing noted in this location.
CHR10	Residential led	Rejected	Potential loss of BMV agricultural land. Within the Green Belt. Within Kent Downs National Landscape. Local impacts associated with consented Lower Thames Crossing noted in this location.
CHR11	Residential led	Rejected	Unavailable.
CHR13	Residential led (Gypsy and Traveller)	Rejected	Potential loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services. Local impacts associated with consented Lower Thames Crossing noted in this location. However, the Council will explore the potential to provide more provision of its public site at Cuxton through intensification and/or expansion for gypsy and traveller accommodation.
CHR14	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services. Local impacts associated with consented Lower Thames Crossing noted in this location.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
CHR15	Non-residential	Rejected	Potential loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services.
CHR16	Non-residential	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
CHR17	Non-residential	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
CHR18	Non-residential	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
CHR19	Non-residential	Rejected	Retain existing land use.
CHR2	Non-residential	Rejected	Close proximity to SSSI. Potential loss of BMV agricultural land. Within the Green Belt. Encroaches on Kent Downs National Landscape. Beyond reasonable walking distance to current public transport services. Local impacts associated with consented Lower Thames Crossing noted in this location.
CHR20	Residential led	Rejected	Under construction.
CHR21	Non-residential	Rejected	Potential adverse impact on Schedule Monument.
CHR3	Non-residential	Rejected	Close proximity to Ancient Woodland. Potential loss of BMV agricultural land. Within the Green Belt. Within Kent Downs National Landscape. Potential adverse impact on Conservation Area. Beyond reasonable walking distance to current public transport services. Local impacts associated with consented Lower Thames Crossing noted in this location.
CHR5	Non-residential	Rejected	Potential loss of BMV agricultural land. Within the Green Belt. Local impacts associated with consented Lower Thames Crossing noted in this location. Local impacts associated with consented Lower Thames Crossing noted in this location.
CHR6	Residential led	Rejected	Unavailable. Care home is under construction. Local impacts associated with consented Lower Thames Crossing noted in this location.
CHR7	Residential led	Rejected	Potential loss of BMV agricultural land. Within the Green Belt. Beyond reasonable walking distance to current public transport services. Local impacts associated with consented Lower Thames Crossing noted in this location.
CHR8	Non-residential	Rejected	Principle of development established through planning consent. Local impacts associated with consented Lower Thames Crossing noted in this location.
FH1	Non-residential	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
FP1	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
FP10	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
FP11	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
FP12	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location,

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
			making best use of PDL and potential improvement to urban form through redevelopment.
FP14	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
FP16	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
FP17	Residential led	Rejected	Unavailable.
FP18	Residential led	Rejected	Unavailable.
FP19	Residential led	Rejected	Unavailable.
FP2	Residential led	Rejected	Unavailable.
FP22	Residential led	Rejected	Unavailable.
FP23	Residential led	Rejected	Unavailable.
FP25	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
FP4	Residential led	Rejected	Unavailable.
FP5	Residential led	Rejected	Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Unavailable.
FP6	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
FP7	Residential led	Rejected	Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Unavailable.
FP8	Residential led	Rejected	Unavailable.
FP9	Residential led	Rejected	Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Unavailable.
GN10	Residential led	Rejected	Beyond reasonable walking distance to current public transport services. Unavailable.
GN11	Residential led	Rejected	Unavailable.
GN13	Residential led	Rejected	Unavailable.
GN14	Residential led	Rejected	Unavailable.
GN15	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GN3	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GN4	Residential led	Rejected	Unavailable.
GN5	Residential led	Rejected	Unavailable.
GN6	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GN8	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
			for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GS1	Residential led	Rejected	Potential adverse impact on Schedule Monument. Potential adverse impact on Conservation Area. Unavailable.
GS10	Residential led (Mixed-use)	Rejected	Unavailable.
GS11	Residential led	Rejected	Unavailable.
GS12	Residential led (Mixed-use)	Rejected	Retain existing land use.
GS13	Residential led	Rejected	Unavailable.
GS14	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GS18	Residential led (Mixed-use)	Rejected	Retain existing land use.
GS19	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GS2	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GS20	Residential led	Rejected	Unavailable.
GS23	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GS24	Residential led	Rejected	Potential adverse impact on greenspace. Unavailable.
GS26	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GS27	Residential led (Mixed-use)	Rejected	Potential adverse impact on greenspace. Unavailable.
GS29	Residential led	Rejected	Retain existing land use.
GS30	Residential led	Rejected	Under construction.
GS32	Residential led	Rejected	Unavailable.
GS33	Residential led	Rejected	Under construction.
GS34	Residential led	Rejected	Retain existing land use.
GS35	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GS37	Residential led (Mixed-use)	Rejected	Unavailable.
GS4	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
GS5	Residential led	Rejected	Unavailable.
GS6	Residential led	Rejected	Under construction.
GS7	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
GS8	Residential led (Mixed-use)	Rejected	Redeveloped to office.
HHH1	Non-residential	Rejected	Close proximity to SSSI. Close proximity to Ancient Woodland. Potential loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH11	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH14	Residential led	Rejected	Close proximity to SSSI. Potential adverse impact on greenspace. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH15	Residential led	Selected	Capable of overcoming constraints. Aligns with spatial strategy.
HHH16	Non-residential	Rejected	Close proximity to SSSI. Potential adverse impact on greenspace. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH17	Residential led	Rejected	Potential adverse impact on greenspace. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH18	Residential led (Mixed-use)	Rejected	Close proximity to SSSI. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Beyond reasonable walking distance to current public transport services.
HHH19	Non-residential	Selected	Capable of overcoming constraints.
HHH21	Non-residential	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services. Unavailable.
HHH23	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH24	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH25	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH28	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH29	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
			for sustainable development, supporting improved services.
HHH30	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH32	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH33	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH37	Non-residential	Selected (designated as Existing Employment Area)	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Existing employment area. Principle of development established through planning consent.
HHH38	Non-residential	Selected (designated as Existing Employment Area)	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Existing employment area. Principle of development established through planning consent.
HHH39	Non-residential	Selected (designated as Existing Employment Area)	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Existing employment area. Principle of development established through planning consent.
HHH4	Residential led	Rejected	Unavailable.
HHH40	Residential led	Rejected	Close proximity to SSSI. Potential loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH41	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH5	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH7	Residential led	Rejected	Close proximity to SSSI. Close proximity to Ancient Woodland. Potential adverse impact on greenspace. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH8	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
HHH9	Residential led	Rejected	Potential loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services. Unavailable.
HW11	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
HW3	Residential and secondary school	Selected	Capable of overcoming constraints. Aligns with spatial strategy.
HW5	Non-residential	Rejected	Unavailable.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
HW6	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
HW7	Residential or non-residential	Rejected	Potential loss of BMV agricultural land. Unavailable.
HW8	Residential led	Rejected	Unavailable.
L11	Residential led	Rejected	Completed in 2023 (MC/22/0053).
L12	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
L2	Residential led	Rejected	Unavailable.
L3	Residential led	Rejected	Unavailable.
L7	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
L9	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
LW10	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
LW2	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
LW3	Residential led	Rejected	Under construction.
LW4	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
LW5	Residential led (C2 use)	Rejected	Unavailable. Care home is permitted.
LW7	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
PP1	Residential led	Rejected	Encroaches on Ancient Woodland. Potential loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services.
REWW3	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
RN1	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
RN10	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Beyond reasonable walking distance to current public transport services.
RN11	Residential led	Rejected	Under construction.
RN12	Non-residential	Rejected	Potential adverse impact on greenspace. Beyond reasonable walking distance to current public transport services. Unavailable.
RN14	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Beyond reasonable walking distance to current public transport services.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
RN16	Residential led	Rejected	Potential adverse impact on Local Nature Reserve. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
RN17	Residential led	Selected	Following Regulation 18b consultation, site promoter has demonstrated how concerns and constraints could be addressed.
RN18	Residential led	Rejected	Under construction.
RN19	Residential led	Rejected	Potential adverse impact on Local Nature Reserve. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
RN2	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements.
RN22	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
RN23	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
RN24	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
RN25	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
RN26	Residential led (Mixed-use)	Rejected	Close proximity to SSSI. Beyond reasonable walking distance to current public transport services.
RN27	Residential led	Rejected	Under construction.
RN28	Residential led	Selected	Planning permission granted.
RN29	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
RN3	Residential led	Rejected	Retain existing land use.
RN30	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
RN31	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
RN32	Residential led	Rejected	Under construction.
RN33	Non-residential	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services.
RN34	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
RN4	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Beyond reasonable walking distance to current public transport services.
RN5	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Beyond reasonable walking distance to current public transport services.
RSE1	Non-residential (road spur and open space)	Rejected	Potential loss of BMV agricultural land.
RSE11	Non-residential	Rejected	Loss of BMV agricultural land. Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Beyond reasonable walking distance to current public transport services.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
RSE4	Residential led	Rejected	Close proximity to Ancient Woodland. Potential loss of BMV agricultural land.
RSE8	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Noted Swale Borough Council's concerns at Regulation 18b. Incompatible with spatial strategy.
RSE9	Residential led	Rejected	Loss of BMV agricultural land. Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Beyond reasonable walking distance to current public transport services. Incompatible with spatial strategy. Noted Swale Borough Council's concerns at Regulation 18b. Incompatible with spatial strategy.
RWB1	Residential led	Rejected	Under construction.
RWB10	Non-residential	Rejected	Unavailable.
RWB11	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
RWB12	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
RWB14	Residential led	Rejected	Unavailable.
RWB15	Residential led	Rejected	Under construction.
RWB17	Residential led	Rejected	Unavailable.
RWB18	Residential led	Rejected	Unavailable.
RWB19	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
RWB2	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
RWB20	Residential led	Rejected	Unavailable.
RWB21	Residential led	Rejected	Unavailable.
RWB23	Non-residential	Rejected	Unavailable.
RWB25	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
RWB3	Residential led	Rejected	Unavailable.
RWB4	Residential led	Rejected	Unavailable.
RWB5	Non-residential	Selected	Capable of overcoming constraints.
RWB6	Residential led	Rejected	Unavailable.
RWB8	Residential led (Mixed-use)	Rejected	Unavailable.
RWB9	Residential led (Mixed-use)	Rejected	Unavailable.
SMI1	Residential led	Rejected	Retain existing land use.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
SMI2	Non-residential	Rejected	Principle of development established through planning consent. Potential adverse impact on listed building.
SNF1	Residential led	Selected	The site could overcome constraints following Duty to Cooperate engagement with Gravesham Borough Council, Green Belt Review and emerging public transport study. NPPF Green Belt release exceptional circumstances met.
SNF10	Residential led (Mixed-use)	Rejected	Unavailable.
SNF12	Residential led	Rejected	Unavailable.
SNF13	Residential led (Mixed-use)	Rejected	Unavailable.
SNF15	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF16	Residential led (Mixed-use)	Rejected	Potential adverse impact on listed building. Unavailable.
SNF17	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF18	Residential led (Mixed-use)	Rejected	Unavailable.
SNF19	Non-residential	Rejected	Potential adverse impact on listed building. Unavailable.
SNF2	Residential led (Mixed-use)	Rejected	Overlaps with SNF3.
SNF20	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF21	Residential led (Mixed-use)	Rejected	Unavailable.
SNF22	Residential led (Mixed-use)	Rejected	Unavailable.
SNF23	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF24	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF25	Non-residential	Rejected	Retain existing land use.
SNF26	Non-residential	Rejected	Retain existing land use.
SNF27	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF28	Non-residential	Rejected	Potential adverse impact on listed building. Unavailable.
SNF30	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location,

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
			making best use of PDL and potential improvement to urban form through redevelopment.
SNF31	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF32	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF33	Non-residential	Rejected	Retain existing land use.
SNF34	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF35	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF36	Residential led (Mixed-use)	Rejected	Unavailable.
SNF37	Residential led (Mixed-use)	Rejected	Unavailable.
SNF38	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF39	Residential led	Rejected	Unavailable.
SNF41	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF43	Residential led	Rejected	Under construction.
SNF44	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF5	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
SNF6	Residential led	Rejected	Beyond reasonable walking distance to current public transport services. Unavailable.
SNF8	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SNF9	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
SR1	Residential led	Rejected	Loss of BMV agricultural land. Within the Green Belt. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR10	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR13	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR14	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development, supporting improved services.
SR15	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR16	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR18	Residential led (Mixed-use)	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR2	Non-residential	Rejected	Loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services.
SR21	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR22	Residential led	Rejected	Potential loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services. Unavailable.
SR24	Residential led	Rejected	Close proximity to SSSI. Close proximity to Ancient Woodland. Potential loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR25	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SR27	Residential led	Rejected	Loss of BMV agricultural land. Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Beyond reasonable walking distance to current public transport services.
SR29	Non-residential	Rejected	Beyond reasonable walking distance to current public transport services. Unavailable.
SR3	Residential led	Rejected	Principle of development established through planning consent. Loss of BMV agricultural land. Within the Green Belt. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Beyond reasonable walking distance to current public transport services.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
SR30	Residential led (Mixed-use)	Rejected	Noted Environment Agency's comments at Regulation 18b. Noted commentary in Employment Land Needs Assessment. Opportunity for strategic approach to managing flood risk. Requires comprehensive masterplan for SR53.
SR31	Residential led (Mixed-use)	Rejected	Noted Environment Agency's comments at Regulation 18b. Noted commentary in Employment Land Needs Assessment. Opportunity for strategic approach to managing flood risk. Requires comprehensive masterplan for SR53.
SR32	Residential led (Mixed-use)	Rejected	Close proximity to SSSI. Potential loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services.
SR33	Non-residential	Rejected	Principle of development established through planning consent. Beyond reasonable walking distance to current public transport services.
SR34	Residential led	Rejected	Noted Environment Agency's comments at Regulation 18b. Noted commentary in Employment Land Needs Assessment. Opportunity for strategic approach to managing flood risk. Requires comprehensive masterplan for SR53.
SR35	Non-residential	Rejected	Principle of development established through planning consent. Beyond reasonable walking distance to current public transport services.
SR36	Residential led (Mixed-use)	Rejected	Noted Environment Agency's comments at Regulation 18b. Noted commentary in Employment Land Needs Assessment. Opportunity for strategic approach to managing flood risk. Requires comprehensive masterplan for SR53.
SR37	Residential led (Mixed-use)	Rejected	Noted Environment Agency's comments at Regulation 18b. Noted commentary in Employment Land Needs Assessment. Opportunity for strategic approach to managing flood risk. Requires comprehensive masterplan for SR53.
SR38	Residential led (Mixed-use)	Rejected	Noted Environment Agency's comments at Regulation 18b. Noted commentary in Employment Land Needs Assessment. Opportunity for strategic approach to managing flood risk. Requires comprehensive masterplan for SR53.
SR39	Residential led (Mixed-use)	Rejected	Potential loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services.
SR4	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
SR40	Residential led (Mixed-use)	Rejected	Noted Environment Agency's comments at Regulation 18b. Noted commentary in Employment Land Needs Assessment. Opportunity for strategic approach to managing flood risk. Requires comprehensive masterplan for SR53.
SR41	Residential led (Mixed-use)	Rejected	Close proximity to SSSI. Potential loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR42	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Potential adverse impact on Schedule Monument. Beyond reasonable walking distance to current public transport services.
SR43	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Potential adverse

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
			impact on Schedule Monument. Beyond reasonable walking distance to current public transport services.
SR45	Non-residential	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Beyond reasonable walking distance to current public transport services.
SR46	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR47	Residential led	Rejected	Under construction.
SR48	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
SR49	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
SR5	Residential led	Selected	The site could overcome constraints following Duty to Cooperate engagement with Gravesham Borough Council, Green Belt Review and emerging public transport study. NPPF Green Belt release exceptional circumstances met.
SR50	Residential led	Rejected	Unavailable.
SR51	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
SR52	Residential led (Mixed-use)	Rejected	Close proximity to SSSI. Close proximity to Ancient Woodland. Potential adverse impact on greenspace. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR6	Residential led (Mixed-use)	Rejected	Close proximity to SSSI. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SR7	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
SR8	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
SW1	Residential led	Rejected	Under construction.
SW2	Residential led	Rejected	Unavailable.
SW3	Residential led	Rejected	Unavailable.
SW5	Residential led	Rejected	Under construction.
SW6	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
SW7	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
SW8	Residential led	Rejected	Unavailable.
T1	Non-residential	Rejected	Potential adverse impact on greenspace. Unavailable.
T2	Residential led	Rejected	Loss of BMV agricultural land. Unavailable.
T3	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.

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Site reference	Site use	Selected or rejected?	Outline reason for selection / rejection provided by Medway Council
W1	Residential led	Rejected	Retain existing land use. Unavailable.
W11	Non-residential	Rejected	Potential adverse impact on greenspace. Unavailable.
W12	Residential led	Rejected	Potential adverse impact on Local Nature Reserve. Potential loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services.
W13	Non-residential	Rejected	Principle of development established through planning consent. Potential loss of BMV agricultural land.
W14	Non-residential	Rejected	Potential loss of BMV agricultural land. Unavailable.
W3	Residential led	Rejected	Under construction.
W4	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
W7	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
W8	Residential led	Rejected	Under construction.

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Appendix K: Site Policy Assessments

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K.1 Introduction

K.1.1 Preface

K.1.1.1 This appendix provides an assessment of the 14 site allocation policies set out in the Regulation 19 version of the Medway Local Plan. Each policy relates to a number of site allocations that have been proposed for inclusion in the Plan by Medway Council, grouped by geographic area.

K.1.1.2 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix B**).

K.1.1.3 The site policy assessments have been prepared in accordance with the methodology as set out in **Chapter 4** of the Main Regulation 19 SA Report (see **Volume 2**).

K.1.1.4 The site allocation policies relate to proposed development sites which have also been assessed as part of the reasonable alternative site assessments in the SA process, based on the site assessment methodology as presented in **Appendix E**. The assessment of site policies has drawn on the findings from the post-mitigation evaluation of reasonable alternative sites (see **Appendix I**), but also takes into account the further site-specific information and mitigation proposed through the site policies for the allocated sites.

K.1.1.5 Each appraisal in the following sections of this appendix includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.

K.1.1.6 The policies assessed within this appendix are based on the most up to date policy wording at the time of assessment, provided by Medway Council on 12th June 2025. The policy text used in the SA is presented in a box alongside each of the assessment narratives within this document. It should be noted that there may be minor wording or formatting changes to the policies compared to that within the Regulation 19 Consultation version of the Local Plan.

K.1.2 Overview of policy assessments

K.1.2.1 The impact matrices for all site policy assessments are presented in **Table K.1.1**. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

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Table K.1.1: *Summary of site policy assessments*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy ref	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA1	+/-	0	+/-	0	-	0	++	+	0	++	+	+
SA2	+/-	-	-	+	-	0	++	+	+	++	+	+
SA3	+/-	+	+/-	0	-	+	++	+	0	++	+	+
SA4	+/-	-	+/-	+	-	0	++	+	+	++	+	+
SA5	+/-	-	+/-	-	-	-	++	+	0	++	+	+
SA6	+/-	+	+/-	0	-	--	++	0	0	+	++	+
SA7	+/-	+	+/-	-	-	--	++	0	0	+	++	+
SA8	+/-	+	+/-	-	-	--	++	-	0	+	++	++
SA9	+/-	+	+/-	-	-	--	++	-	0	+	+	+
SA10	+/-	+	+/-	-	-	--	++	0	0	+/-	++	+
SA11	+/-	-	+/-	-	-	--	++	-	0	-	0	+
SA12	+/-	-	+/-	-	-	-	++	-	0	-	+	+
SA13	+/-	+/-	-	+/-	--	-	++	-	0	+	+	+
SA14	+/-	-	+/-	-	--	--	0	-	0	-	0	++

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K.2 Assessment of site allocation policies

K.2.1 Policy SA1: Chatham Town Centre and Surrounds

K.2.1.1 Policy SA1 sets out 23 sites to be allocated in the Chatham Town Centre area. All of these sites have been evaluated in the SA process as non-strategic sites. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.1.2 **Table K.2.1** summarises the post-mitigation assessment for these 23 sites, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.1.3 The following assessment considers the extent to which the provisions of Policy SA1 will further improve sustainability of these sites.

Table K.2.1: *Post-mitigation assessment of sites allocated under Policy SA1 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
CCB1	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
CCB12	Non-strategic	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
CCB15	Non-strategic	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB19	Non-strategic	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
CCB20	Non-strategic	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB21	Non-strategic	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
CCB27	Non-strategic	+/-	-	+/-	-	-	+	+	+	0	++	+	+
CCB3	Non-strategic	+/-	+	+/-	-	-	+	+	-	0	++	+	+
CCB30	Non-strategic	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
CCB31	Non-strategic	+/-	-	+/-	+/-	-	-	++	+	0	++	+	+
CCB37	Non-strategic	+/-	+	+/-	+/-	-	+	++	+	0	++	+	+
CCB39	Non-strategic	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
CCB49	Non-strategic	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
CCB7	Non-strategic	+/-	-	+/-	+/-	-	-	+	+	0	++	+	+
CCB8	Non-strategic	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
FP10	Non-strategic	+/-	+	+/-	-	-	-	++	-	0	++	+	+
FP25	Non-strategic	+/-	+	+/-	+/-	-	-	++	-	0	++	+	+
GS2	Non-strategic	+/-	+	+/-	-	-	-	+	+	0	++	+	+
L12	Non-strategic	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+
L7	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
L9	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+

Policy SA1: Chatham Town Centre and Surrounds
Objective

Policy SA1: Chatham Town Centre and Surrounds

1. In delivering on its residential potential, opportunity sites within Chatham Town Centre can also provide a mix of uses, public realm improvements and more to support sustainable in-centre living, shopping and working. Development will be guided by the following:

Criteria

2. Total site area: 11.78ha
3. Collectively these identified small to medium sized sites will deliver circa 1,347 new homes predominantly within the early part of the plan period.
4. The redevelopment of these brownfield, underused and vacant sites will be encouraged where in accordance with other relevant policies in this Local Plan and principles within the Chatham Design Code (2024) and the Chatham Town Centre Masterplan (2019).
5. Housing mix and Affordable Housing provision will be provided in accordance with policies T2 and T3 respectively. As part of the wider housing strategy, the provision of supported housing, students, older persons and specialist needs will be supported where considered appropriate
6. Mixed use schemes with active frontages within the centre will be supported, particularly along the high street to continue to encourage positive footfall into the centre and support in-centre working and living.
7. Proposals should, in demonstrating compliance with policy S1, explore the potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, to minimise embodied carbon emissions.
8. Ensure air quality is appropriately addressed through the proposal design particularly in the identified Air Quality Management Area (AQMA).
9. Ensure proposals are informed by appropriate scoped heritage, landscape and townscape assessments.
    a. Site FP10 is within the setting of scheduled monuments and must demonstrate its contribution to heritage significance.
    b. Site FP25 has an opportunity to reveal much about the history of Chatham through sensitive design. The scale of development will need to be carefully and sensitively considered to avoid impacting upon designated heritage and listed buildings.
10. Contribute toward the provision of green-blue infrastructure and suitable walking and cycling links to improve accessibility, health and well-being objectives.

Subsequent design principles

11. Demonstrate consideration of the historic environment and the townscape by submitting with a planning application, a:
    a. Views analysis
    b. landscape and townscape assessments that has been used to inform the design of the scheme
12. Site FP25 must be supported by a masterplan alongside a planning application
13. Sites CCB49 and GS2 must provide a Heritage, Townscape and Visual Impact Assessment alongside a planning application
14. Flood Risk Assessment

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
CCB1	Avenue Business Centre, 17 New Road Avenue, Chatham	Residential	Circa 12	1-5, 6-10
CCB3	Cambridge House, 1 Cambridge Terrace, Chatham	Residential	Circa 13	1-5
CCB7	153-155 High Street, Chatham	Residential	Circa 9	1-5
CCB8	Mountbatten House, 28 Military Road, Chatham	Residential	Circa 164	1-5

Policy SA1: Chatham Town Centre and Surrounds

CCB12	Land bounded by Richard Street, Clove Street and James Street, Chatham	Residential	Circa 24	1-5
CCB15	Former Debenhams, Chatham	Residential	Circa 60	1-5, 6-10
CCB19	1-3 Rhode Street, Chatham	Residential	Circa 13	1-5
CCB20	Former Trafalgar Centre and Multi Storey Car Park, High Street, Chatham	Residential	Circa 98	1-5
CCB21	263-269 High Street, Chatham	Residential	Circa 14	1-5
CCB27	R/O 295-299 High Street fronting The Brook, Chatham	Residential	Circa 20	1-5
CCB30	13-17 Church Street, Chatham	Residential	Circa 21	1-5
CCB31	Land bounded by the Brook Car Park, Queen Street, Chatham	Residential	Circa 179	1-5
CCB37	Former Go Outdoors, Chatham	Residential	Circa 200	1-5, 6-10
CCB39	389-391 High Street, Chatham	Residential	Circa 24	1-5
CCB49	Telephone Exchange, Best Street, Chatham	Residential	Circa 150	1-5, 6-10
FP10	Former St John Fisher School	Residential	Circa 139	1-5
FP25	Chatham Rail Station area	Residential	Circa 121	1-5, 6-10
GS2	Samuels Towers, Longhill Avenue, Chatham	Residential	Circa 45	1-5, 6-10
L7	272-274 Luton Road, Chatham	Residential	Circa 6	1-5
L9	352-356 Luton Road, Luton	Residential	Circa 22	1-5
L12	101 Beacon Road, Chatham	Residential	Circa 13	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA1	+/-	0	+/-	0	-	0	++	+	0	++	+	+

K.2.1.4 The sites allocated under Policy SA1 will collectively result in the delivery of approximately 1,347 new homes, including a mixture of housing types and affordable homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.1.5 While the primary land use of each site is residential, Policy SA1 encourages mixed-use schemes with active frontages, which could provide some local employment opportunities and boost economic vitality and spending within Chatham Town Centre. A minor positive impact on the economy (SA Objective 12) could therefore be achieved.

K.2.1.6 The Chatham area is expected to provide good sustainable access to schools and healthcare facilities. Whilst some sites allocated under this policy lie outside of the recommended sustainable distance to leisure facilities, Policy SA1 requires contributions to green-blue infrastructure and improved active travel links. This will provide opportunities for outdoor exercise and recreation, and additionally encourage sustainable transport choices leading to improved access to local services and facilities. Overall, a major positive impact is identified for transport and accessibility (SA Objective 10), and a minor positive impact in terms of health and education (SA Objectives 8 and 11).

K.2.1.7 The majority of sites allocated under Policy SA1 lie within 200m of 'Central Medway' Air Quality Management Area (AQMA). Despite the positive provisions of Policy SA1 (and other MLP policies) in encouraging more sustainable transport modes and ensuring "*air quality is appropriately addressed*", there is potential for the development to cumulatively result in an adverse effect on air quality and make it more challenging to achieve national air quality objectives within the AQMA. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. A minor negative impact on pollution (SA Objective 5) cannot be ruled out.

K.2.1.8 Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated greenhouse gas (GHG) emissions. Benefits for climate change mitigation may be secured via the requirement to explore methods to reduce embodied carbon emissions, given the brownfield status of several of the site allocations in Chatham. However, it is recommended that Policy SA1 could go further in supporting low-car or car-free development, and requiring incorporation of low-carbon or renewable technologies and sustainable design principles.

K.2.1.9 The majority of sites allocated under Policy SA1 comprise previously developed land. One (Site CCB12) is wholly undeveloped, and a small number of sites contain some undeveloped areas; none support any high quality agricultural land. The policy emphasises the importance of re-using brownfield and under-utilised land, supporting an efficient use of natural resources and encouraging urban regeneration. Overall, a negligible loss of soil resources is anticipated (SA Objective 6).

K.2.1.10 Owing to the majority of development being situated on previously developed land, and in light of the requirement within Policy SA1 to ensure that development is informed by a Flood Risk Assessment, it is anticipated that any adverse effects associated with flooding will be identified and mitigated. A negligible impact on climate change adaptation is identified (SA Objective 2).

K.2.1.11 Policy SA1 will ensure that development in Chatham is "*informed by appropriate scoped heritage, landscape and townscape assessments*" which will be expected to minimise harm to the local character, including heritage assets and their settings. Opportunities for enhancement of the appearance and character of the townscape, and better revealing the significance of heritage assets, could be secured through careful design. On balance, a negligible impact is identified for landscape and cultural heritage (SA Objectives 4 and 9).

K.2.1.12 The proposed contributions to green-blue infrastructure in Policy SA1 may serve to deliver multi-functional benefits including for biodiversity. It is recommended that the policy includes reference to the need to conserve and enhance biodiversity (or cross-reference to the provisions of other relevant MLP policies), especially given the proximity of allocations under the policy to the River Medway and its various nature conservation

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designations. The Regulation 19 HRA[1] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA1 on biodiversity (SA Objective 3) is uncertain.

K.2.2 Policy SA2: Heritage-led Sites

K.2.2.1 Policy SA2 sets out seven sites to be allocated for heritage-led development, located in the Chatham, Rochester and Fort Pitt areas. All of these sites have been evaluated in the SA process as non-strategic sites. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.2.2 **Table K.2.2** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.2.3 The following assessment considers the extent to which the provisions of Policy SA2 will further improve sustainability of these sites.

Table K.2.2: *Post-mitigation assessment of sites allocated under Policy SA2 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
CCB25	Non-strategic	+/-	-	-	-	-	+	++	-	0	++	+	+
CCB35	Non-strategic	+/-	-	+/-	-	-	-	0	+	0	++	0	++
FP1	Non-strategic	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
FP11	Non-strategic	+/-	-	-	+/-	-	+	++	-	0	++	+	+
FP12	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
FP14	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB19	Non-strategic	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+

Policy SA2: Heritage-led Sites

Objective

1. Medway is rich in heritage and prides itself in protecting, celebrating and enhancing this. Two strategic heritage led site allocations will provide an opportunity to sensitively deliver on housing targets whilst respecting its heritage context, i.e. Interface land and Star Hill to Sunpier. Development proposals will be guided by the following:

Criteria

2. Interface Land:
   a. Combined site areas: 5.3ha

[1] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

Policy SA2: Heritage-led Sites

b. Combined site capacity: Circa 150 new homes as part of a mixed use development

c. Both sites are within the setting of a number of scheduled monuments and Dockyard buildings and also contain undesignated archaeology. Mixed use schemes must respond positively to the historic and locational context and be compliant with the Interface Land Supplementary Planning document (SPD)

d. Development will need to be compliant with relevant Local Plan policies including but not limited to heritage DM10 and S8, housing mix T2, affordable housing T3, design T1, DM5, DM6 and S14

e. Development should seek to reinforce the historic character of the northern end of the Dockyard, currently the focus of timber management associated with the construction of ships.

3. Star hill to Sunpier:
   a. Combined site areas: 3.68
   b. Combined site capacity: circa 474 new homes
   c. Development will need to be compliant with the Starhill to Sunpier Development Framework, relevant Conservation Area Appraisal and Management plan and relevant Local Plan policies including but not limited to S9, S8, DM10.
   d. The historic setting and context will be appropriately addressed:
      i. Proposals on site FP1 should seek to retain and reuse existing historic buildings and where possible reinforce and reveal areas of now lost historic landscape.
      ii. Development on site FP11 should reinforce and reveal the special historic character of the conservation area, avoiding taller and bulky built forms.
4. Proposals should, in demonstrating compliance with policy S1, explore the potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, to minimise embodied carbon emissions.

Subsequent design principles

5. Archaeological desk-based assessment and evaluation will be required where necessary to inform detailed proposals alongside planning applications.
6. Compliance with Interface Land SPD
7. Compliance with relevant Conservation Area Appraisals and Management Plans
8. Compliance with Star Hill to Sunpier Development Framework

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
CCB25	Riverside (Interface Land)	Residential	Circa 150	6-10
CCB35	Brunel (Interface Land)	Mixed-use	0	11-15
FP1	320-346 High Street Rochester	Residential	Circa 28	6-10
FP11	Grays Garage, High Street, Chatham	Residential	Circa 123	1-5
FP12	6-11 New Road Avenue, Rochester	Residential	Circa 70	1-5, 6-10
FP14	73 High Street, Chatham	Residential	Circa 7	1-5

Policy SA2: Heritage-led Sites				
RWB19	Bardell Terrace, Rochester	Residential	Circa 246	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA2	+/-	-	-	+	-	0	++	+	+	++	+	+

K.2.2.4 The sites allocated under Policy SA2 will collectively result in the delivery of approximately 624 new homes, including a mixture of housing types and affordable homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.2.5 Policy SA2 focuses on heritage-led sites, requiring development proposals to ensure the design and layout reinforces and seeks to better reveal aspects of the historic environment, informed by the Chatham Interface Land SPD[2] (covering Sites CCB25 and CCB35) and Star Hill to Sunpier SPD[3] (covering Sites FP1, FP11, FP14 and RWB19). The SPDs set out requirements for development including layout, design and views, and require development to be informed by a heritage impact assessment. A minor positive impact on cultural heritage (SA Objective 9) could therefore be achieved, with secondary benefits to the local character and appearance (SA Objective 4).

K.2.2.6 The majority of sites allocated under Policy SA2 comprise previously developed land. One (Site CCB35) contains some undeveloped areas, but does not support any important agricultural land. The policy promotes the sensitive re-use of historic buildings, supporting an efficient use of land and encouraging urban regeneration. On balance, a negligible impact on natural resources is identified (SA Objective 6).

K.2.2.7 The sites allocated under Policy SA2 lie within the existing urban area of Medway, where good sustainable access to schools, jobs and healthcare facilities is likely for the majority of sites. However, some sites allocated under this policy lie outside of the recommended sustainable distance to leisure facilities. Policy SA2 requires compliance with SPDs for Interface Land[4] and Star Hill to Sunpier[5]. The Star Hill to Sunpier SPD seeks to enhance the public realm, improve connections for pedestrians in the local area, and provide

[2] Medway Council (2018) Development Brief: Interface Land, Chatham. Supplementary Planning Document, June 2018. Available at: https://www.medway.gov.uk/downloads/file/2989/chatham_interface_land_development_brief_june_2018 [Date accessed: 16/06/25]

[3] Medway Council (2024) Star Hill to Sun Pier Supplementary Planning Document 2024. Available at: https://www.medway.gov.uk/downloads/file/8610/star_hill_to_sun_pier [Date accessed: 03/06/25]

[4] Medway Council (2018) Development Brief: Interface Land, Chatham. Supplementary Planning Document, June 2018. Available at: https://www.medway.gov.uk/downloads/file/2989/chatham_interface_land_development_brief_june_2018 [Date accessed: 16/06/25]

[5] Medway Council (2024) Star Hill to Sun Pier Supplementary Planning Document 2024. Available at: https://www.medway.gov.uk/downloads/file/8610/star_hill_to_sun_pier [Date accessed: 03/06/25]

publicly accessible piers and waterfront areas. The Interface Land SPD seeks to deliver a high-quality and inter-connected public realm, and states that "*Applicants should embrace Sport England's Active Design concept which promotes healthy communities through good urban design including maximising pedestrian and cycle connections*". Overall, a major positive impact is identified for transport and accessibility (SA Objective 10), and a minor positive impact in terms of human health, access to education and employment (SA Objectives 8, 11 and 12).

K.2.2.8 Benefits for climate change mitigation may be secured via the requirement to explore methods to reduce embodied carbon emissions, given the brownfield status of several of the site allocations under this policy. The Star Hill to Sunpier SPD additionally encourages development proposals to seek to reduce their carbon footprint as much as possible. However, it is recommended that Policy SA2 could go further in supporting low-car or car-free development, and requiring incorporation of low-carbon or renewable technologies and sustainable design principles. It is uncertain whether the effect of Policy SA2 will be positive or negative overall with regard to climate change mitigation (SA Objective 1), although it is anticipated that significant effects will be avoided.

K.2.2.9 The majority of sites allocated under Policy SA2 lie within 200m of 'Central Medway' AQMA. Despite the positive provisions of Policy SA2 (and other MLP policies) in encouraging more sustainable transport modes, there is potential for the development to cumulatively result in an adverse effect on air quality and make it more challenging to achieve national air quality objectives within the AQMA. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. A minor negative impact on pollution (SA Objective 5) cannot be ruled out.

K.2.2.10 Site CCB25 lies wholly within Flood Zones 2 and 3 (98% within Zone 3, and 2% within Zone 2), and Site FP11 partially (41% within Zone 3 and 6% within Zone 2). The Star Hill to Sunpier SPD notes that a flood risk assessment must be prepared to inform design solutions, in accordance with the Medway Estuary and Swale Strategy (MEASS). The Chatham Interface SPD describes potential mitigation works that may be required to address tidal flood risk at Site CCB25 including a potential increase in defence levels and/or land raising. Whilst these measures are likely to reduce flood risk, in absence of site-specific mitigation details, a minor negative impact on climate change adaptation (SA Objective 2) cannot be ruled out. There may be opportunities for longer term benefits, following successful implementation and monitoring of flood defence schemes and other interventions.

K.2.2.11 Site CCB25 wholly coincides with Open Mosaic Habitat, and along with Site FP11 lies directly adjacent to the River Medway Marine Conservation Zone (MCZ). The Star Hill to Sunpier SPD recommends that developers "*work with an ecologist to incorporate biodiversity enhancements*" and the Chatham Interface SPD states "*due regard and consideration will be required to ensure the development does not impact significantly on adjacent ecological sites of interest*". Policy SA2 would benefit from more direct reference to required ecological surveys, in order to determine any presence of important habitats or species present on site that should be taken into consideration within the site layout and design to minimise harm and maximise the benefits that can be achieve through on-site BNG. A minor negative impact on biodiversity (SA Objective 3) cannot be ruled out. Furthermore, in absence of the conclusions of the HRA process, uncertainty remains in regard to potential air quality and recreational impacts at European sites that will need to

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be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme.

K.2.3 Policy SA3: Gillingham District Centre and Surrounds

K.2.3.1 Policy SA3 sets out four sites to be allocated in the Gillingham area. All of these sites have been evaluated in the SA process as non-strategic sites. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.3.2 **Table K.2.3** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.3.3 The following assessment considers the extent to which the provisions of Policy SA3 will further improve sustainability of these sites.

Table K.2.3: *Post-mitigation assessment of sites allocated under Policy SA3 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
GS14	Non-strategic	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS19	Non-strategic	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS26	Non-strategic	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
GS4	Non-strategic	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+

Policy SA3: Gillingham District Centre and Surrounds

Objective

1. Infill development in Gillingham District Centre will support sustainable growth objectives. Development proposals will be guided by the following:

Criteria

2. Site area: 0.465 ha
3. Will deliver circa 101 new homes within the first 5 years of the plan period
4. Proposals will demonstrate compliance with the Gillingham masterplan 2019 or more up to date guidance where relevant
5. The small infill developments must be developed in accordance with the relevant Local Plan policies
6. Mixed use schemes will be supported where active frontages encourage footfall, support the vitality and vibrancy of the centre and encourages centre living.
7. Student accommodation and facilities would be supported due to its proximity to universities
8. Proposals should, in demonstrating compliance with policy S1, explore the potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, to minimise embodied carbon emissions.
9. Opportunities must be sought to connect walking and cycle routes to connect to destinations including universities and with the proposed Gillingham Greenway as a rich green resource for residents to improve health and connectivity to the waterfront and riverside walk.

Subsequent design principles

10. Demonstrate compliance with relevant guidance

Policy SA3: Gillingham District Centre and Surrounds

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
GS4	4 Fox Street and 5-7 Mill Road, Gillingham	Residential	Circa 24	1-5
GS14	105-107 High Street, Gillingham	Residential	Circa 6	1-5
GS19	Former snooker hall, 48 Green Street, Gillingham	Residential	Circa 57	1-5
GS26	82 Jeffery Street, Gillingham	Residential	Circa 14	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA3	+/-	+	+/-	0	-	+	++	+	0	++	+	+

K.2.3.4 The sites allocated under Policy SA3 will collectively result in the delivery of approximately 101 new homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.3.5 While the primary land use of each site is residential, Policy SA3 encourages mixed-use schemes with active frontages, which could provide some local employment opportunities and boost economic vitality and spending within Gillingham District Centre. A minor positive impact on the economy (SA Objective 12) could therefore be achieved.

K.2.3.6 The Gillingham area is expected to provide good sustainable access to schools and healthcare facilities. Policy SA3 additionally requires enhanced walking and cycling connections via the proposed Gillingham Greenway[6], which will provide opportunities for outdoor exercise and recreation, and may encourage sustainable transport choices leading to improved access to local services and facilities. Overall, a major positive impact is identified for transport and accessibility (SA Objective 10), and minor positive impacts for health and education (SA Objectives 8 and 11).

[6] Medway Council (2025) Gillingham Open Lines Project. Available at: https://www.medway.gov.uk/info/200177/regeneration/1593/gillingham_open_lines_project_our_bid [Date accessed: 16/06/25]

K.2.3.7 Policy SA3 requires development to be in compliance with the Gillingham Masterplan[7], which provides advice on a number of topics including transport, highlighting required improvements to public transport and active travel links. Combined with the improvements highlighted in Policy SA3 to the pedestrian network, there is potential for these measures to help reduce reliance on private cars and thereby reduce associated emission of air pollutants and other GHGs. However, owing to the location of the sites allocated under Policy SA3 within 200m of the A231, a minor negative impact on exposure to transport-associated air and noise pollution cannot be ruled out (SA Objective 5). Adverse effects on water quality could also occur. Furthermore, although Policy SA3 does encourage opportunities to reduce embodied emissions, further measures such as incorporation of low-carbon or renewable technologies and sustainable design principles would strengthen the policy with regard to tackling climate change. It is uncertain whether the effect of Policy SA3 will be positive or negative overall with regard to climate change mitigation (SA Objective 1).

K.2.3.8 All sites allocated under Policy SA3 comprise previously developed land. The policy promotes infill development within the existing urban area, supporting an efficient use of land and encouraging urban regeneration. A minor positive impact on natural resources is identified (SA Objective 6).

K.2.3.9 All sites allocated under Policy SA3 lie wholly in Flood Zone 1 and in areas with insignificant surface water flood risk. Furthermore, a range of GI enhancements are set out in the policy that may help to improve resilience to flooding and heat risk. A minor positive impact on climate change adaptation is identified (SA Objective 2).

K.2.3.10 The Gillingham Masterplan highlights the history of Gillingham and distinctive architecture that should be retained, with reference also to the adjacent 'Great Lines Heritage Park' (Brompton Lines Conservation Area). It also notes a number of current poor-quality buildings and locations within the town that will benefit from regeneration. Policy SA3, nor the Gillingham Masterplan, make specific requirements with regard to enhancing the character and appearance of the townscape or its heritage assets, although further design guidance is in preparation for this area. Based on the content of other MLP policies, a negligible impact is identified for landscape and cultural heritage (SA Objectives 4 and 9), although it is likely that positive effects could be secured via careful planning and design of regeneration schemes.

K.2.3.11 The Regulation 19 HRA[8] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA3 on biodiversity (SA Objective 3) is uncertain.

K.2.4 Policy SA4: River Waterfront

K.2.4.1 Policy SA4 sets out four sites to be allocated at the waterfront area in north Gillingham. Three of these sites have been evaluated in the SA process as non-strategic sites, and

[7] Tibbalds (2019) Gillingham Town Centre Masterplan & Delivery Strategy. Available at: https://www.medway.gov.uk/downloads/file/4525/gillingham_town_centre_masterplan [Date accessed: 04/06/25]

[8] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

one as a strategic site. Site SMI6 contains mixed uses including residential and employment and has been assessed as such in the SA process; the residential portion of the site only is allocated under Policy SA4. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix F** and **G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.4.2 **Table K.2.4** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.4.3 The following assessment considers the extent to which the provisions of Policy SA4 will further improve sustainability of these sites.

Table K.2.4: *Post-mitigation assessment of sites allocated under Policy SA4 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
GN15	Non-strategic	+/-	-	-	-	-	+	++	-	0	++	+	+
GN3	Non-strategic	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
GN6	Non-strategic	+/-	-	-	-	-	-	++	+	0	++	+	+
SMI6	Strategic	+/-	-	-	-	--	+	++	+	0	++	+	+

Policy SA4: River Waterfront

Objective

1. Development will deliver greater accessibility for residents to the waterfront through increased permeability and connectivity between the sites and the surrounding area. This will take the form of a strong greenway link to Gillingham District centre and a riverside walk connecting St Marys island to the Strand, which is the missing link to provide a comprehensive riverside walk to the rest of Medway. In doing so, development will strongly be supporting health, accessibility, amenity objectives and improving quality environments for future residents and existing.

Criteria

2. Development proposals will deliver up to 4,197 new homes:
   a. The mix of housing will be provided in line with Housing Policy T2 and T3, reflecting the communities' needs as evidenced in the Medway Local Housing Needs Assessment, 2025.
   b. Within the wider housing strategy, the Council would require this scale of growth to meet a wide range of housing needs, including specialist provision for older people (policy T4) and student accommodation (policy T5).
   c. Accommodation for older people could be complimented by accessible services and facilities including convenience retail where justified and the required sequential and impact tests are satisfied.
3. Proposals should, in demonstrating compliance with policy S1, explore the potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, to minimise embodied carbon emissions.
4. Any enhancement in waterfront accessibility will have no adverse impact upon the integrity of the North Kent Marshes designations (and Functionally Linked Land), either alone or in-combination.
5. The waterfront sites sit in a very hard, urban context with little green infrastructure particularly along the rivers edge. The development sites present an opportunity, as a transition zone, to bring in green infrastructure from north of Pier Road and blending in between the built form of proposals toward the

Policy SA4: River Waterfront

rivers edge. This will help reverse the potentially unwelcoming riverside façade and enable the provision of an attractive riverside walk.

6. Building heights must be assessed as part of a composed skyline that works with local and distant relationships:
    a. Proposed building heights shall positively respond and relate to the existing built form in immediate and close proximity to the site and visibility from natural landscapes from a distance like Riverside Country Park and Cockham Park.
    b. The height of development on site GN6 must not be overbearing in relation to the neighbouring Strand. Its relationship with the Strand should be more gentle without adversely impacting on the Strands' amenity.
7. A Green-blue infrastructure strategy will inform place-making and the design and layout of proposals:
    a. Development will respond to its setting by addressing the inadequate provision of green space. Proposals will be required to soften the location with amenity space, landscape and public realm treatments, extending from Pier Road and between built form through to the rivers edge.
    b. Delivery of the Gillingham Greenway will connect the new growth allocation to Gillingham District Centre, supporting access to the riverside, sustainability and healthier lifestyles.
    c. SM16 should maximise the opportunity to provide a generous amount of high quality, publicly accessible green infrastructure as a resource for the public to enjoy as part of the riverside walk.
8. The urban context will not provide for adequate space to meet all the requirements for open space and playing pitch provision in line with the Field in Trust standards.
    a. Amenity space, equipped and informal play will be provided in accordance with policy DM21
    b. Provision of natural and semi-natural green space could be provided off-site or as enhancements to the Strand and/or Riverside Country Park.
    c. financial contribution will be sought for the provision or enhancement of outdoor sports provision
9. Connections will aim to bring the developments together to create a natural continuity between the west (St Mary's Island) and the east (The Strand), as well as between the north (Waterfront) and the south (Town / local communities)
    a. Proposals will work together to create far reaching links, bringing pedestrians and movements towards the rivers edge as well as joining the areas along the riverside.
    b. The Gillingham Greenway will provide the main substantial link to the wider Gillingham area alongside a network of natural routes as set out in the concept plan. The foundation of the network of routes currently exist and will require enhancements.
    c. A network of safe, attractive connections to key destinations will ensure well used routes and support sustainability and health objectives.
10. The rivers edge is a manmade frontage with an inadequate provision of green infrastructure or natural features that could assist in flood mitigation.
    a. Delivery of the scale of housing on GN15 will require land reclamation, enabling the reconfiguration of the boat moorings. This will create opportunities to enhance ecological sustainability in the area.
    b. Flood mitigation and/or a flood defence wall will be required to enable delivery
11. Issues on contamination on GN6 will require remediation to ensure safe, accessible and healthy development.
12. The underground infrastructure will also need to be addressed to ensure ease of access and optimisation of the site for development. The current placement of gas pipes could have implications for the layout and placement of buildings.
13. The design and layout of streets will follow a legible hierarchy that maximise opportunities for pedestrian and cycling.
    a. Main accesses will be taken off Pier Road for all sites.
    b. Provision for emergency accesses must be addressed to ensure the sites are serviceable.
    c. All sites should be sustainably accessed and demonstrate a 10% modal shift

Policy SA4: River Waterfront

d. Proposals shall explore alternative parking solutions to more sustainable transport options including bus stops, tram links, cycle hubs, walk ways, uber/taxi hubs and other transit initiatives.

e. In addition to the walkway along the riverfront, developments will need to demonstrate high degrees of permeability through segregated walking and cycle ways connecting to other key destinations and other.

14. Site SM16 presents an opportunity for heritage led regeneration that draws on the sites history as an important anchor in the Dockyards later development, while simultaneously offering a great opportunity to support large scale growth.
    a. A development brief based on a thorough understanding of the site's heritage and its setting would help de-risk future development and allow for the proper planning of new development that is sympathetic to Medway's historic environment as a whole.

Subsequent design principles

15. The applicants for sites GN6, GN15 and SMI6 will collaborate to produce a masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details.
16. A comprehensive approach to site development will be expected, informed by an approved master plan, which demonstrates how the policy and infrastructure requirements set out in the respective plans relating to the site as whole, with a phasing plan, will be achieved.
17. Preparation of an infrastructure delivery plan / phasing plan
18. Development shall be phased broadly instep with infrastructure delivery plan and phasing plan
19. Any application for development on part of the site shall accord with the adopted master plan and shall not prejudice the implementation of the site as a whole.
20. Delivery will be secured through a legal agreement.
21. S106 – provision of financial contributions towards the provision of infrastructure, including additional primary and secondary school places in accordance with the latest IDP.
22. Potential funding from Homes England could support:
    a. Land reclamation
    b. Flood defence wall
    c. Address contamination
    d. Address underground infrastructure
    e. Delivery of the Green Greenway connecting the waterfront to Gillingham District council

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
GN3	Pier Approach, Road Depot	Residential	Up to 176	6-10
GN6	Former gas works site, north of Pier Road, Gillingham	Residential Older persons accommodation Convenience retail	Up to 500	1-5
GN15	Gillingham Marina	Residential	Up to 1,100	1-5, 6-10, 11-15
SMI6	Chatham Waters	Residential	Up to 2,200	1-5, 6-10, 11-15, 15+

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA4	+/-	-	+/-	+	-	0	++	+	+	++	+	+

K.2.4.4 The sites allocated under Policy SA4 will collectively result in the delivery of approximately 4,197 new homes, including a mixture of housing types, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.4.5 The waterfront area is expected to provide good sustainable access to jobs, schools and healthcare facilities. Policy SA4 requires a green-blue infrastructure strategy to be prepared to inform the development, including delivery of the Gillingham Greenway that will be expected to improved active travel links and amenity space. This will provide opportunities for outdoor exercise and recreation, and additionally encourage sustainable transport choices leading to improved access to local services and facilities, including the new convenience retail offer within Site GN6. In addition to providing good access to existing employment opportunities, the proposed improvements to the appearance and pedestrian connectivity within the waterfront area, linking into Gillingham District Centre, could further boost economic vitality and spending within the local area. There is likely to be some loss of employment space within residential-led Site SM16 given the site is located on a large commercial/industrial area, although the indication of some retail/commercial usage within the site masterplan is likely to partially compensate for the loss of employment space. On balance, a major positive impact is identified for transport and accessibility (SA Objective 10), and a minor positive impact in terms of health, education and the economy (SA Objectives 8, 11 and 12). It should be noted that the assessment against transport is pending the results of the Strategic Transport Assessment to ensure that any implications on the constrained highways network, including around the Strand Roundabout[9] in proximity to the sites allocated under Policy SA4, can be suitably avoided or mitigated.

K.2.4.6 The majority of sites allocated under Policy SA4 comprise previously developed land. One (Site GN6) contains some undeveloped areas, but does not support any important agricultural land. The policy highlights the opportunity for urban regeneration, supporting an efficient use of natural resources. Overall, a negligible loss of soil resources is anticipated (SA Objective 6).

K.2.4.7 All sites allocated under Policy SA4 lie within 200m of Gillingham AQMA. Despite the positive provisions of Policy SA4 (and other MLP policies) in encouraging more sustainable transport modes and exploring "*alternative parking solutions*", there is potential for the development to cumulatively result in an adverse effect on air quality and make it more challenging to achieve national air quality objectives within the AQMA. There is additionally potential for the proposed development to increase the risk of contamination

[9] Jacobs (2025) Medway Transport Model – Medway LP Regulation 19 Summary. Draft, June 2025.

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of watercourses, especially given the waterfront location of the sites. A minor negative impact on pollution (SA Objective 5) cannot be ruled out.

K.2.4.8 Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated GHG emissions. Benefits for climate change mitigation may be secured via the requirement to explore methods to reduce embodied carbon emissions, given the brownfield status of several of the site allocations in Gillingham. However, it is recommended that Policy SA4 could go further in supporting low-car or car-free development, and requiring incorporation of low-carbon or renewable technologies and sustainable design principles.

K.2.4.9 Owing to their waterfront location, all sites allocated under Policy SA4 are at risk of flooding to varying extents, including Site GN15 where 97% of the site area lies in Flood Zone 3. Policy SA4 requires a range of GI enhancements as well as "*flood mitigation and/or a flood defence wall*" to enable delivery of the proposed development. Whilst these measures are likely to reduce flood risk, in absence of site-specific mitigation details, a minor negative impact on climate change adaptation (SA Objective 2) cannot be ruled out. A detailed flood risk assessment will be required, in line with the recommendations of the SFRA[10]. There may be opportunities for longer term benefits, following successful implementation and monitoring of flood defence schemes and other interventions.

K.2.4.10 Policy SA4 will ensure that development at the waterfront is informed by a comprehensive masterplan, with appropriate building heights to "*positively respond and relate to the existing built form*" including long-distance views, and integrated GI to provide a transition between the river and the urban centre. The policy highlights the opportunity for heritage-led regeneration particularly at Site SMI6. These measures will be likely to avoid harm to the local character, including heritage assets and their settings, and ensure opportunities are taken to improve the appearance and character of the townscape. Overall, a minor positive impact on the landscape and cultural heritage could be achieved (SA Objectives 4 and 9). It is recommended that Policy SA4 includes wording to ensure that development will be informed by a Heritage Impact Assessment.

K.2.4.11 The proposed contributions to green-blue infrastructure in Policy SA4 may serve to deliver multi-functional benefits including for biodiversity. The policy also recognises the potential "*opportunities to enhance ecological sustainability in the area*". It is recommended that the policy includes reference to the need to conserve and enhance biodiversity (or cross-reference to the provisions of other relevant MLP policies), especially given the proximity of allocations under the policy to the River Medway and its various nature conservation designations. The Regulation 19 HRA[11] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA4 on biodiversity (SA Objective 3) is uncertain.

[10] Herrington (2025) Level 2 Strategic Flood Risk Assessment – Medway Council. Draft, May 2025.

[11] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

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K.2.5 Policy SA5: Strood District Centre and Surrounds

K.2.5.1 Policy SA5 sets out 15 sites to be allocated in the Strood area. All of these sites have been evaluated in the SA process as non-strategic sites. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.5.2 **Table K.2.5** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.5.3 The following assessment considers the extent to which the provisions of Policy SA5 will further improve sustainability of these sites.

Table K.2.5: *Post-mitigation assessment of sites allocated under Policy SA5 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
SNF15	Non-strategic	+/-	-	+/-	+/-	-	+	++	+	0	++	+	+
SNF20	Non-strategic	+/-	+	+/-	+/-	-	+	+	+	0	++	+	+
SNF23	Non-strategic	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF27	Non-strategic	+/-	+	+/-	+/-	-	-	+	+	0	++	+	+
SNF30	Non-strategic	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF34	Non-strategic	+/-	-	+/-	+/-	-	+	+	+	0	++	+	+
SNF35	Non-strategic	+/-	-	+/-	+/-	-	+	++	-	0	++	+	+
SNF38	Non-strategic	+/-	-	+/-	-	-	-	+	+	0	++	+	+
SNF41	Non-strategic	+/-	-	-	-	-	+	++	+	0	++	+	+
SNF44	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	+	+	+
SNF5	Non-strategic	+/-	+	+/-	-	-	-	+	+	0	+	+	+
SNF8	Non-strategic	+/-	+	+/-	-	-	+	+	+	0	++	+	+
SNF9	Non-strategic	+/-	+	+/-	-	-	-	+	+	0	++	+	+
SR25	Non-strategic	+/-	+	+/-	--	-	-	++	-	0	+	+	+
SW6	Non-strategic	+/-	+	+/-	+/-	+/-	-	+	+	0	++	+	+

Policy SA5: Strood District Centre and Surrounds

Objective

1. Strood District Centre will undergo significant change. Delivery of a robust transport interchange alongside significant new growth will support it becoming an attractive and highly accessible destination of choice for living, working and enjoying. Development will be guided by the following:

Criteria

2. Site area: 21.17ha
3. Identified sites will deliver circa 1,079 new homes

Policy SA5: Strood District Centre and Surrounds

4. Development proposals shall demonstrate compliance with relevant Local Plan policies, The Strood Waterfront Development Brief (2018) and the Strood Town centre masterplan 2019 and/or updated guidance where relevant.
5. Proposals should, in demonstrating compliance with policy S1, explore the potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, to minimise embodied carbon emissions.
6. A transport interchange will be provided:
    a. This will provide a destination for a Bus Rapid Transit corridor connection with Hoo St Werburgh ensuring wider accessibility to communities and supporting sustainable movements.
    b. Sites within or adjacent to the centre should be explored to provide the transport interchange
    c. Will be supported by a network of pedestrian and cycle links and supported by a frequent and reliable bus service
7. Greater accessibility to London Victoria services will be achieved by delivering improvements to Strood rail station by way of new platforms and improved pedestrian access.
8. SNF41 will include a commercial use within the residential led scheme to support the rail station.
9. The increase in housing provision will require an expanded/improved/new Healthy living centre at SNF20
10. Clustered together (SNF9, SNF15), these sites represent a significant mixed use redevelopment opportunity for Strood Town Centre that could reinforce and reveal its historic townscape and deliver on housing, retail and commercial requirements. Proposals must be supported by a comprehensive masterplan.
11. SNF34 combined with the Council owned civic site (SNF35), a prominent riverside site, be deliver a residential-led scheme
    a. The provision of appropriate supporting commercial uses including leisure and food/drink opportunities to enliven street/riverside frontages and public spaces will be supported.
    b. it has the opportunity to respectfully and sensitively address Rochester Castle and its setting in delivering a reimagined entrance into Strood District Centre. It is essential that proposals demonstrate an understanding of the historic significance of the site and its surrounding and be supported by a views analysis.
12. Will ensure flood risk is appropriately mitigated and managed to support development
13. The provision of usable open space will be optimised where possible to support a healthier, sustainable and attractive environment for communities to enjoy living in.

Subsequent design principles

14. The applicants for sites SNF9, SNF15, SNF17, SNF34, SNF35 and SNF41 will collaborate to produce a masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details.
15. £75k has been secured from Homes England for Strood Riverside. This has funded a transport study to inform the local infrastructure improvements required and a masterplan. A detailed design of the transport interchange will be required and informed by the masterplan.
16. S106 contributions will be sought toward the delivery of infrastructure
17. A Green infrastructure strategy and open space strategy will support a planning application.
18. The Transport interchange will need to be supported by an access strategy alongside a planning application.

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
SNF5	Land at 18 Broom Hill Road, Strood	Residential	Circa 8	1-5

Policy SA5: Strood District Centre and Surrounds

SNF8	North Side, Priory Road	Residential	Circa 19	1-5
SNF9	North-west of Cuxton Road, Strood	Residential	Circa 40	1-5, 6-10
SNF15	Land surrounding Tesco, Strood	Residential	Circa 350	6-10
SNF20	Medical Centre, North of Gun Lane, Strood	Residential	Circa 15	1-5
SNF23	100-110 High Street, Strood	Residential	Circa 8	1-5
SNF27	24 Gun Lane Strood	Residential	Circa 13	1-5
SNF30	75-81 High Street, Strood	Residential	Circa 9	1-5
SNF34	Texaco, 23-37 High Street, Strood	Residential	Circa 52	1-5, 6-10
SNF35	Civic Centre, Strood	Residential	Circa 171	6-10
SNF38	1-7 Canal Road, Strood	Residential	Circa 12	1-5
SNF41	Strood Riverside	Residential	Circa 216	6-10
SNF44	Garden Service Station, Frindsbury Hill	Residential	Circa 6	1-5
SR25	West of Parsonage Lane, Frindsbury	Residential	Circa 152	1-5
SW6	178 Darnley Road, Strood	Residential	Circa 8	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA5	+/-	-	+/-	-	-	-	++	+	0	++	+	+

K.2.5.4 The sites allocated under Policy SA5 will collectively result in the delivery of approximately 1,079 new homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.5.5 While the primary land use of each site is residential, Policy SA5 encourages commercial and retail uses to be provided, which could provide some local employment opportunities and boost economic vitality and spending within Strood District Centre. A minor positive impact on the economy (SA Objective 12) could therefore be achieved.

K.2.5.6 The Strood area is expected to provide good sustainable access to jobs, schools and healthcare facilities. Whilst some sites allocated under this policy lie outside of the recommended sustainable distance to leisure facilities, Policy SA5 requires the development to be guided by a GI strategy, provide "*usable open space*" and a "*healthy living centre*". The policy additionally sets out a proposed transport interchange with active travel and rapid bus links, as well as improvements to Strood Railway Station, supported by an access strategy. These measures will provide opportunities for outdoor exercise and recreation, and additionally encourage sustainable transport choices leading to improved access to local services and facilities. Overall, a major positive impact is identified for transport and accessibility (SA Objective 10), and a minor positive impact in terms of health and education (SA Objectives 8 and 11).

K.2.5.7 In light of their prominent riverside location, Sites SNF35 and SNF34 will be required to demonstrate and "*understanding of the historic significance of the site and its surrounding and be supported by a views analysis*" and other sites in the local area should seek to "*reinforce and reveal [Strood's] historic townscape*". Policy SA5 will be expected to ensure that any adverse impacts on heritage assets and their settings, including the Grade I Listed Rochester Castle that lies directly across the River Medway, will be avoided. The policy requires compliance with the Strood Waterfront Development Brief[12] and the Strood Town Centre Masterplan[13], which recognise the need to consider the setting of and views from/towards heritage assets, and highlight opportunities to improve the character and appearance of the townscape and ensure effects on longer distance views are considered. With careful consideration of site layout and design, these provisions could potentially lead to positive effects on the heritage and townscape character of Strood. However, one site allocated under Policy SA5, Site SR25, lies outside of the existing built-up area of Strood, in an area of 'high' sensitivity and 'medium-high' capacity according to the Hoo Landscape Sensitivity and Capacity Study[14], indicating that the landscape and/or visual characteristics are vulnerable to change. The Landscape Sensitivity and Capacity Study highlights the need to maintain a "*green backdrop between the A289 and the Grade I listed barn*" within this site. On balance, Policy SA5 is identified to result in a negligible impact on cultural heritage (SA Objective 9) and a minor negative impact on the landscape (SA Objective 4).

K.2.5.8 Although the majority of sites allocated under Policy SA5 comprise previously developed land, several contain some undeveloped areas, including Site SR25 that contains some land of Agricultural Land Classification (ALC) Grade 1. A minor negative impact on soil resources is identified (SA Objective 6).

K.2.5.9 The majority of sites allocated under Policy SA5 lie within 200m of 'Central Medway' AQMA. Policy SA5 requires compliance with the Strood Waterfront Development Brief which states that "*a fully detailed assessment and costed air quality mitigation scheme will be required to support a planning application for the Strood Waterfront Development*". Despite the positive provisions of this requirement, and other MLP policies in encouraging more sustainable transport modes, there is potential for the development to cumulatively result in an adverse effect on air quality and make it more challenging to achieve national

[12] Medway Council (2018) Strood Waterfront Development Brief. Available at: https://www.medway.gov.uk/downloads/file/3003/strood_waterfront_development_brief_2018 [Date accessed: 16/06/25]

[13] Allies and Morrison Urban Practitioners (2019) Medway Council: Strood Town Centre Masterplan. Available at: https://www.medway.gov.uk/downloads/file/4523/strood_town_centre_masterplan [Date accessed: 16/06/25]

[14] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 16/06/25]

air quality objectives within the AQMA. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. A minor negative impact on pollution (SA Objective 5) cannot be ruled out.

K.2.5.10 Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated GHG emissions. Benefits for climate change mitigation may be secured via the requirement to explore methods to reduce embodied carbon emissions, given the brownfield status of several of the site allocations in Strood. However, it is recommended that Policy SA5 could go further in supporting low-car or car-free development, and requiring incorporation of low-carbon or renewable technologies and sustainable design principles.

K.2.5.11 Site SNF41 lies directly adjacent to the River Medway MCZ. The Strood Waterfront Development Brief requires direct and indirect impacts on the MCZ to be avoided, and seeks to ensure that the development design to "*protect, preserve and enhance ecological values including the river*". However, the Regulation 19 HRA[15] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA5 on biodiversity (SA Objective 3) is uncertain.

K.2.5.12 Site SNF41 lies largely within Flood Zones 2 and 3 (92% within Zone 3, and 3% within Zone 2) and Site SNF15 partially (56% within Zone 3, and 7% within Zone 2). Policy SA5 states that development will need to "*ensure flood risk is appropriately mitigated and managed to support development*". The Strood Waterfront Development Brief highlights the need for improvements to flood defences to facilitate development. Whilst these measures are likely to reduce flood risk, in absence of site-specific mitigation details, a minor negative impact on climate change adaptation (SA Objective 2) cannot be ruled out. A detailed flood risk assessment will be required, in line with the recommendations of the SFRA[16]. There may be opportunities for longer term benefits, following successful implementation and monitoring of flood defence schemes and other interventions.

K.2.6 Policy SA6: Land West of Strood

K.2.6.1 Policy SA6 sets out three sites to be allocated in the area to the west of Strood. Two of these sites have been evaluated in the SA process as non-strategic sites, and one as a strategic site. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix F** and **G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.6.2 **Table K.2.6** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.6.3 The following assessment considers the extent to which the provisions of Policy SA6 will further improve sustainability of these sites.

Table K.2.6: *Post-mitigation assessment of sites allocated under Policy SA6 (extracted from* ***Appendix I****)*

[15] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

[16] Herrington (2025) Level 2 Strategic Flood Risk Assessment – Medway Council. Draft, May 2025.

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		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
SNF1	Non-strategic	+/-	+	+/-	-	-	-	++	-	0	-	+	+
SR5	Non-strategic	+/-	+	+/-	-	-	-	++	-	0	+	+	+
SNF3	Strategic	+/-	+	+/-	-	--	--	++	-	0	+	0	++

Policy SA6: Land West of Strood

Objective

1. Land West of Strood, together with Chapter Farm (Gravesham Borough Council), will provide a comprehensive cross border sustainable location for growth, which transitions between the urban edge of Strood and the Green Belt and maintains the identity of the rural settlement of Three Crutches.
2. Medway Council will work collaboratively with Gravesham Borough Council to deliver this strategic cross border Green Belt site providing up to 4,000 new homes, two primary schools, an expansion of an existing primary school, a secondary school, 2 hectares of employment and a local centre, 2 football pitches and indoor sports provision.

Criteria

3. Will deliver up to 1,280 new Medway homes within the plan period:
    a. The housing density must reflect the transition from urban to countryside ensuring densities are gradually lowered toward the countryside edges
    b. The housing mix must be in compliance with The Local Housing Need Assessment and policy T2 in providing for the needs of the community.
    c. Affordable Housing will be provided in accordance with the Golden Rules.
4. Proposals shall demonstrate a landscape led approach, which takes account of:
    a. The countryside context, key landscape characteristics, views, the significance of heritage assets and the setting of the Kent Downs National Landscape.
    b. The landscaping will be planted at an early stage of the development and provide new habitats for priority nature conservation species and be appropriate to landscape character.
    c. a substantial buffer along the A289 is provided to enhance the transition into the Green Belt and provide a noise mitigation.
5. A Green-blue infrastructure strategy will shape placemaking by supporting the design and layout of proposals:
    a. The development design will respond to its countryside setting, the landscape and topography
    b. Maximise opportunities for generous provision of high quality and publicly accessible multi-functional green-blue infrastructure, biodiversity enhancements and SuDS
    c. It will deliver on:
        i. environmental gains Biodiversity Net Gain (10% minimum)
        ii. and ecological enhancements in line with the Local Nature Recovery Strategy priorities.
6. The design and layout of streets will follow a legible hierarchy for maximum bus accessibility and pedestrian movement:
    a. The primary access points will be taken off Gravesend Road, the A2 (Watling Street) and Stone Horse Lane to provide the main through routes.
    b. Multi-modal access will be facilitated by lower order roads
    c. Old Watling Street, Crutches Lane and Strodes Close will be improved to support walking and cycling access

Policy SA6: Land West of Strood

7. Proposals will encourage sustainable habits and ensure a strong sense of place by delivering a connected development informed by a strategic access strategy, which will:
    a. prioritise active travel, well designed parking solutions and multi-modal access into and out of the site supported by an integrated public transport and cycle/mobility hub with a reliable and frequent bus service and cycle/mobility hub
    b. Opportunities to establish a reliable and frequent bus service must include the exploration of Fast Track to serve the area west of Gravesend Road.
    c. explore the opportunity to widen and segregate cycle route NC177 in the provision of a walking and cycling network
    d. provide attractive walking and cycling links between the existing Strood District Centre, the new development and the surrounding countryside including linkages with NNRs and LNRs, other destinations and points of interest.
8. Proposals for the area to the west of Gravesend Road shall have regard for the heritage significance of Chapter Farm and its setting. Proposals shall ensure that the historic administrative boundary is protected and enhanced.
9. The co-location of uses will provide an attractive location for investment and support convenience, accessibility and sustainability.
    a. Provision of a local centre is preferred centrally on the western side of Gravesend Road. This centre will include convenience retail to meet the day to day needs of residents, complementary retail and community uses (use classes Eb-Ef, F2) and an active travel cycle/mobility hub.
    b. 2 hectares of employment provision co-located with the centre on the western side of Gravesend Road, providing flexibility to accommodate commercial uses serving the local community (use Classes Eb-Eg, F2).
    c. Provision must be of appropriate scale, format and type that is sensitive to the countryside location and provides an appropriate response to the setting of the Kent Downs National Landscape.
    d. Development will be set within green infrastructure and appropriate connections through segregated walking and cycling routes, bus linkages.
10. The development will provide for new education facilities in accordance with the latest IDP:
    a. two two-form entry primary schools
    b. An expansion of one-form entry to Temple Hill Primary school
    c. an eight-form entry secondary school

Consideration will be given to efficient use of land in the delivery of an all-through school, which would include a three-form entry primary school plus an eight-form entry secondary school.

11. New open space and playing pitches will be provided in accordance with the Fields in Trust (FIT) standards as set out in policy DM21. Allotment provision will be required at a standard of 0.25ha/1000 people.
    a. The development will incorporate publicly accessible, well-managed and high quality open spaces, which are linked to the open countryside and adjoining settlements.
    b. Provision will include two football pitches (one of which must be 3G) with associated changing room facilities, which can be co-located with the education infrastructure.
    c. Proposals will provide a replacement indoor sports facility.
    d. There is an opportunity to co-locate or include the sports pitches and indoor sports facility within the schools. A Community Use Agreement with a new Primary or Secondary schools would help to ensure access to sports infrastructure and a more efficient use of land.

Subsequent design principles

12. The applicants for sites SNF1, SNF3 and SR5 will collaborate to produce a landscape-led masterplan, to be approved by Medway Council and Gravesham Borough Council to guide subsequent planning applications and further approval of details.

Policy SA6: Land West of Strood

13. A comprehensive approach to site development will be expected, informed by an approved master plan, which demonstrates how the policy and infrastructure requirements set out in the respective plans relating to the site as whole, with a phasing plan, will be achieved.
14. Preparation of an infrastructure delivery plan / phasing plan
15. Development shall be phased broadly instep with infrastructure delivery plan and phasing plan
16. Any application for development on part of the site shall accord with the approved masterplan and shall not prejudice the implementation of the site as a whole.
17. Delivery will be secured through a legal agreement.
18. S106 – provision of financial contributions towards the provision of infrastructure, including additional primary and secondary school places in accordance with the latest IDP.
19. An access strategy must be informed by audits into Strood District Centre and other destination points like supermarkets etc.

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
SNF1	Land west of A226 Gravesend Road and north of Brompton Farm Road	Residential with opportunity for other TBD	Up to 360	1-5, 6-10
SNF3	Land bounded by Dillywood Lane, A226 Gravesend Road and Brompton Farm Road	Residential Other TBD	Up to 800	1-5, 6-10, 11-15
SR5	Land west of Stonehorse Lane	Residential	Up to 120	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA6	+/-	+	+/-	0	-	--	++	0	0	+	++	+

K.2.6.4 The sites allocated under Policy SA6 will collectively result in the delivery of approximately 1,280 new homes towards housing provision in Medway, including a mixture of housing types and affordable homes. A major positive impact is identified under SA Objective 7.

K.2.6.5 While the primary land use of each site is residential, Policy SA6 includes provision of a local centre with convenience retail and potential for some commercial uses, which could provide some local employment opportunities and boost economic vitality and spending within the local area. A minor positive impact on the economy (SA Objective 12) could therefore be achieved.

K.2.6.6 The Strood area is expected to provide good sustainable access to jobs, schools and healthcare facilities. The sites allocated under Policy SA6 are located at the edge of Strood's existing settlement, some of which lie outside of the recommended sustainable distance to GP surgeries and leisure facilities. On site (SNF1) lies just outside of the recommended sustainable distance of 2km to railway stations. Policy SA6 requires provision of "*publicly accessible, well-managed and high quality open spaces*" and new sports pitches. The policy additionally requires a strategic access strategy to ensure provision of an "*integrated public transport and cycle/mobility hub*" and active travel links. These measures will provide opportunities for outdoor exercise and recreation, and additionally encourage sustainable transport choices leading to improved access to local services and facilities, including healthcare facilities in the wider Strood area, and Strood Station for onward travel. Furthermore, new and expanded schools are to be provided in accordance with the Infrastructure Delivery Plan (IDP). Overall, a major positive impact is identified for education (SA Objective 11), a minor positive impact for transport and accessibility (SA Objective 10), and a negligible impact in terms of health (SA Objective 8).

K.2.6.7 Policy SA6 requires a "*landscape-led masterplan*" and a green-blue infrastructure strategy to guide delivery of the three allocated sites. The proposed development will need to take into account the landscape setting, cultural heritage assets, key characteristics and views, including with regard to the Kent Downs National Landscape, which lies at its closest point 1.2km from the allocations. Overall, a negligible impact on the landscape and cultural heritage (SA Objectives 4 and 9) is identified.

K.2.6.8 The proposed public transport and active travel enhancements may help to reduce reliance on private cars to some extent. The enhanced GI, including the provision of a green buffer along the A289, will be likely to reduce exposure of site end users to transport-associated air and noise pollution associated with the main road. However, an increase in domestic and vehicular emissions is likely to some extent as a result of the large-scale development. A minor negative impact on air pollution (SA Objective 5) is identified. There is additionally potential for the proposed development to increase the risk of contamination of watercourses.

K.2.6.9 Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated GHG emissions depending on the development design and the level of uptake of new sustainable transport initiatives.

K.2.6.10 All three sites allocated under Policy SA6 lie on land of ALC Grade 1, representing some of Medway's best and most versatile (BMV) agricultural land. Although there may be scope to preserve some high-quality soils for the purpose of food growing associated with the proposed allotments at 0.25ha/1000 people, an overall major negative impact on soil resources is identified (SA Objective 6).

K.2.6.11 All sites allocated under Policy SA6 lie wholly in Flood Zone 1 and in areas with insignificant surface water flood risk. Furthermore, a range of GI enhancements are set out in the policy that may help to improve resilience to flooding and heat risk. A minor positive impact on climate change adaptation is identified (SA Objective 2).

K.2.6.12 Policy SA6 seeks to ensure biodiversity enhancements are secured via BNG and in accordance with the Local Nature Recovery Strategy, and further requires "*new habitats*

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for priority nature conservation species". However, the Regulation 19 HRA[17] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA6 on biodiversity (SA Objective 3) is uncertain.

K.2.7 Policy SA7: Capstone Valley

K.2.7.1 Policy SA7 sets out seven sites to be allocated in the Capstone Valley area. Five of these sites have been evaluated in the SA process as non-strategic sites, and two as strategic sites. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix F** and **G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.7.2 **Table K.2.7** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.7.3 The following assessment considers the extent to which the provisions of Policy SA7 will further improve sustainability of these sites.

Table K.2.7: *Post-mitigation assessment of sites allocated under Policy SA7 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
HW11	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HW3	Non-strategic	+/-	+	+/-	-	-	--	+	-	0	-	++	+
LW10	Non-strategic	+/-	+	+/-	-	+/-	-	+	-	0	-	0	+
LW4	Non-strategic	+/-	+	+/-	-	-	--	++	-	0	-	0	+
LW7	Non-strategic	+/-	+	+/-	-	-	--	++	-	0	-	0	+
LW6	Strategic	+/-	+	+/-	-	--	--	++	-	0	-	+	+
LW8	Strategic	+/-	+	+/-	-	--	--	++	-	0	-	0	++

Policy SA7: Capstone Valley

Objective

1. By 2041, the Capstone Valley will comprise a sustainable urban extension of up to 3,958 new homes, a primary school, a secondary school and a local centre. As Medway's Green Lung, biodiversity and public access to open space will be improved. A connection between North Dane Way and M2 Junction 4 will provide for an orbital bus route.

Criteria

2. Mill Fields (LW8) will include:
    a. 2.4 ha of land for a new three-form entry primary school, phased in the latter part of the plan period, in accordance with the latest IDP.

[17] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

Policy SA7: Capstone Valley

   b. A local centre commensurate with a new community of 2,330 new homes, including provision of convenience floorspace that meets the day-to-day needs of the local community only.

3. Abbotts Court Farm (HW3) will include 10 ha of land for a new secondary school, phased in the first five years of the plan period, in accordance with the latest IDP.
   a. Mature vegetation cover at the northern boundary of Abbotts Court Farm (HW3) will be retained to screen new development from Chapel Lane allotment gardens.
4. Medway Council will consider opportunities for self-build and custom housebuilding in the disposal of Abbotts Court Farm (HW3).
5. As per Policy DM21, new open space and playing pitches will be provided in line with the Fields in Trust (2024) standards, plus 0.25 ha for new allotment gardens.
   a. A green infrastructure strategy and an approved masterplan will determine how much natural and semi-natural open space will be provided on-site for green infrastructure.
   b. Most of the required natural and semi-natural open space is expected to be provided off-site at Darland Farm, with Capstone Farm Country Park improved as a biodiversity asset.
      i. Darland Farm will be protected as natural and semi-natural open space in perpetuity. Darland Farm may also provide for off-site Biodiversity Net Gain credits.
      ii. New development edges, buffer strips and access to Capstone Farm Country Park will be agreed with Medway Council.
6. A green infrastructure strategy will inform the overall design and layout.
   a. A review of historic landscape components, such as past land divisions, field parcels, boundaries, shaws, hedgerows and woodland, will provide a foundation for subsequent masterplanning.
   b. Internal landscaping will respond to the local landscape character, including multifunctional ecological, drainage and active travel corridors.
   c. The specification of buffer strips close to Ancient Woodland will be agreed with Natural England and Medway Council.
   d. The provision of street trees – plus the design, placement and species to be used – will be aligned with a street hierarchy.
   e. The management of green infrastructure will be secured by Section 106 agreement.
7. An open space strategy, including long-term management plans, will identify opportunities for an on-site community sports hub and off-site outdoor sports provision.
   a. A Community Use Agreement with the new primary and secondary schools would help to ensure access to playing pitches and the most efficient use of land.
8. North Dane Way will connect to M2 Junction 4 via a spine road through Lidsing.
9. New development will have appropriate interfaces with Elm Court and Capstone Farm Country Park.
10. The design and layout of streets will provide for maximum bus accessibility and connections to an orbital bus route.

Subsequent design principles

The Capstone Valley Concept Plan shows an indicative layout.

The applicant will produce a landscape-led masterplan, to be approved by Medway Council, to guide subsequent outline planning applications and further approval of details. The masterplan will be informed by a green infrastructure strategy and an open space strategy.

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)

Policy SA7: Capstone Valley

HW3	Abbotts Court Farm	Residential, with opportunity for self-build and custom housebuilding Secondary school	Up to 75 homes	6-10
HW11	Broomfield Farm	Residential	Up to60 homes	1-5 and 6-10
LW4	Sharstead Farm	Residential	Up to 670 homes	1-5, 6-10 and 11-15
LW6	East Hill	Residential Primary school GP surgery	Up to 698 homes	1-5 and 6-10
LW7	Gibraltar Farm	Residential	Up to 450 homes	1-5 and 6-10
LW8	Mill Fields	Residential Primary school Local centre	Up to 2,000 homes	1-5, 6-10, 11-15 and 11+
LW10	Capstone Stud Farm	Residential	Up to 5 homes	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA7	+/-	+	+/-	-	-	--	++	0	0	+	++	+

K.2.7.4 The sites allocated under Policy SA7 will collectively result in the delivery of approximately 3,958 new homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.7.5 While the primary land use of each site is residential, Policy SA7 includes provision of a local centre including convenience floorspace, which could provide some local employment opportunities and boost economic vitality and spending within the local area. A minor positive impact on the economy (SA Objective 12) could therefore be achieved.

K.2.7.6 Given its current undeveloped nature, the Capstone Valley area provides only limited access to services and infrastructure in the surrounding urban areas. The majority of sites allocated under Policy SA7 are located outside of the recommended sustainable distance to existing healthcare and leisure facilities, schools and railway stations. However, the policy highlights that Site HW3 will include a new secondary school and Site LW6 a new GP surgery. The policy will also ensure provision of new open space, playing pitches and a community sports hub (guided by an open space strategy), enhanced GI, active travel corridors and a new bus route. These measures will provide opportunities for outdoor exercise and recreation, and additionally encourage sustainable transport choices leading to improved access to new and existing local services and facilities. Overall, a major positive impact is identified for education (SA Objective 11), a minor positive impact for

transport and accessibility (SA Objective 10), and a negligible impact in terms of health (SA Objective 8).

K.2.7.7 Policy SA7 requires a "*landscape-led masterplan*" and a GI strategy to guide delivery of the allocated sites. The proposed development will need to respond to the local landscape character, and include a review of historic landscape components, as part of the masterplanning. Given its location with respect to the Kent Downs National Landscape (approximately 360m at its closest point – Site HW3) it is recommended that further site-specific landscape evaluations (e.g., a Landscape and Visual Impact Assessment) are undertaken to understand the extent to which development can be accommodated without harm to the setting of the National Landscape. A minor negative impact on the landscape is identified (SA Objective 4), and an overall negligible impact on cultural heritage (SA Objective 9).

K.2.7.8 The proposed public transport and active travel enhancements may help to reduce reliance on private cars to some extent. The enhanced GI, including the proposed multi-functional corridors, will help to reduce exposure of site end users to transport-associated air and noise pollution. However, an increase in domestic and vehicular emissions is likely to some extent as a result of the large-scale development. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. A minor negative impact on air pollution (SA Objective 5) is identified.

K.2.7.9 Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated GHG emissions depending on the development design and the level of uptake of new sustainable transport initiatives.

K.2.7.10 All three sites allocated under Policy SA7 lie on land of ALC Grade 3, which could potentially represent some of Medway's BMV agricultural land (if found to be sub-grade 3a). Although there may be scope to preserve some high-quality soils for the purpose of food growing, associated with the proposed allotments, an overall major negative impact on soil resources is identified (SA Objective 6).

K.2.7.11 All sites allocated under Policy SA7 lie wholly in Flood Zone 1 and in areas with insignificant surface water flood risk. Furthermore, a range of GI enhancements are set out in the policy that may help to improve resilience to flooding and heat risk. A minor positive impact on climate change adaptation is identified (SA Objective 2).

K.2.7.12 Policy SA7 seeks to ensure biodiversity enhancements are secured via BNG (including potential for a habitat bank at Darland Farm), improvements to Capstone Farm Country Park, and wider GI initiatives. However, the Regulation 19 HRA[18] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA7 on biodiversity (SA Objective 3) is uncertain.

[18] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

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K.2.8 Policy SA8: Hoo St Werburgh and Chattenden

K.2.8.1 Policy SA8 sets out 11 sites to be allocated in the Hoo St Werburgh and Chattenden area. Eight of these sites have been evaluated in the SA process as non-strategic sites, and three as strategic sites. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix E** and **F** (pre-mitigation) and **Appendix H** (post-mitigation).

K.2.8.2 **Table K.2.8** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.8.3 The following assessment considers the extent to which the provisions of Policy SA8 will further improve sustainability of these sites.

Table K.2.8: *Post-mitigation assessment of sites allocated under Policy SA8 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
HHH11	Non-strategic	+/-	+	+/-	-	-	-	++	-	0	-	+	+
HHH24	Non-strategic	+/-	+	+/-	-	-	-	++	-	0	-	0	+
HHH25	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HHH32	Non-strategic	+/-	-	+/-	--	+/-	-	+	-	0	-	0	+
HHH33	Non-strategic	+/-	+	+/-	-	-	--	++	-	0	-	0	+
HHH41	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	+	+
HHH5	Non-strategic	+/-	+	-	--	-	-	+	-	0	-	+	+
HHH8	Non-strategic	+/-	+	+/-	-	-	--	++	-	0	-	+	+
HHH12	Strategic	+/-	+	--	--	--	--	++	-	0	-	+	++
HHH22/HHH31	Strategic	+/-	-	+/-	-	--	--	++	-	0	-	++	++
HHH6	Strategic	+/-	+	+/-	-	--	--	++	-	0	-	+	++

Policy SA8: Hoo St Werburgh and Chattenden

Objectives

1. By 2041 Hoo St Werburgh will have strengthened its role in serving local residents and wider villages across the Hoo Peninsula. Sustainable development will provide around 4,700 new homes, aligned with improvements in transport, community services and facilities, retail, and new job opportunities. Growth in Chattenden will provide for 600 new homes and new and enhanced services.
2. Development will be landscape led, responding sensitively to the natural surroundings and the area's heritage.
3. The separation of Hoo and Chattenden as distinct settlements will be secured through a strategic landscape corridor.
4. Development will provide for distinctive neighbourhoods, with strong connections to the existing and new settlements.

Criteria

Policy SA8: Hoo St Werburgh and Chattenden

5. Development will come forward in accordance with a strategic masterplan for Hoo and Chattenden, providing a framework for design, landscape and green infrastructure, heritage, services, employment, transport, infrastructure, defining distinctive neighbourhoods and centres.
6. Development will be delivered in phases across the plan period, and extend beyond into the 2040s. Infrastructure delivery is linked to the phased growth, with triggers identified in the Hoo Peninsula Infrastructure Plan.
7. Development will provide for a mix of housing, in line with Policy T2 and reflecting the communities' needs as evidenced in the Medway Local Housing Needs Assessment, 2025, or subsequent evidence updates. The Council expects this scale of growth to meet a wide range of housing needs, including specialist provision for older people and people with disabilities, and self build and custom housing.

Centres and Retail

8. Development will contribute to a network of centres across Hoo and Chattenden, with a main centre strengthening Hoo's role as a focus for services for its residents and the wider Hoo Peninsula, supported by smaller centres at neighbourhood level.
9. Land at HHH19 is allocated for the development of Deangate Retail Park, with up to 50,000 sqf GIA retail floorspace (Class Ea), principally providing for a 25,000 sqf GIA supermarket to cater for the Hoo Peninsula, with other retail and ancillary food and drink (Class Eb) of up to 7,500 sqf GIA. This will be accompanied with a new pedestrian crossing over the A228 and associated traffic calming measures, providing access to the new retail park and the wider Deangate area.
10. Land to the east of Hoo (HHH22) is identified as the preferred location for the main centre. This will provide a key destination for residents, with community services, such as health and leisure, accessible and attractive walking and cycling links, including to the new secondary school.
11. Development coming forward in the defined neighbourhoods will align with the strategic masterplan and provide for a network of small centres with uses to meet daily needs of residents without adversely impacting upon existing centres, specifically the established Hoo village centre.

Infrastructure

12. Developers will be required to support the delivery of an Infrastructure Plan for Hoo and Chattenden, providing for the phased implementation of services. Development will deliver a wide range of community services and infrastructure, reflecting the needs arising from the scale of planned growth in the context of the existing village offer. This will include provision for:
    - A new six-form entry secondary school in accordance with the latest IDP.
    - A new two-form entry/1 three-form entry primary school in accordance with the latest IDP.
    - Relocation of Chattenden Primary School, with expansion to two-form entry in accordance with the latest IDP.
    - A Healthy Living Centre
    - A new community centre/hub and investment in increasing capacity in current facilities
    - New indoor sports and leisure facility
    - Outdoor sports and recreation facilities, including improvements to Deangate Running Track

Transport

13. Development shall be designed to ensure strong integration and permeability for pedestrians, cyclists and provision for improved public transport to the surrounding residential neighbourhoods and villages by providing high quality and maintained active travel routes.
14. Development will support the improvement of bus services to provide effective sustainable transport links for Hoo and surrounding villages, with consideration of expansion of fast-track bus services linked to the urban area. Land will be safeguarded to the east of Hoo for a future potential use of the freight line for passenger traffic.
15. In addition to site specific transport requirements, developers will contribute to the delivery of highways mitigations to provide capacity to accommodate growth at:
    a. Four Elms roundabout
    b. Main Road, Hoo, junction with A228

Policy SA8: Hoo St Werburgh and Chattenden

c. Dux Court Road/Bells Lane junction with A228

d. Ropers Lane junction with A228

Environment and Heritage

16. Development will be landscape led. Growth will be directed within a strategic environmental framework that will define the outward development of Hoo and Chattenden. This will provide an effective buffer to sensitive habitats and connect people to the countryside and coast. The strategy will provide opportunities for sustainable drainage measures to enhance the place-making and character of new development, and provide an integrated approach to the delivery of BNG and strategic mitigation.
17. A green infrastructure strategy will inform the design of development, reflecting the neighbourhood approach, and providing connections to surrounding rural area. This will draw on the area's heritage, providing a long-term management plan for historic assets.
18. Along with the strategic masterplan development framework, Historic England England's 'Hoo Peninsula Historic Landscape Project' should be referred to in all applications to demonstrate an understanding of and response to the unique character of the rural area. Where appropriate, provision should be made for enhanced interpretation, particularly for WWII era sites, buried and standing. The military heritage of the Hoo Stop Line will be reflected in green infrastructure planning.
19. A strategic environmental management plan will be prepared and approved by the Council and Natural England to provide the basis for an integrated programme of measures to safeguard and strengthen the natural environment around Hoo and Chattenden, particularly the SPA, Ramsar sites and SSSIs. Development will contribute towards the implementation of the strategic programme to provide for sustainable development and contribute to meeting the requirements of Policies S2 and S3. This will include the delivery of:
    - Deangate Community Parkland
    - Cockham Community Parkland
    - Hoo Wetlands
20. There is potential to deliver a district heating network to support sustainable energy infrastructure. This will be further explored and reflected in the strategic development framework and masterplan.

Employment

21. In addition to the strategic employment sites at Kingsnorth (Policy SA14), development in Hoo and Chattenden will provide for a mix of smaller scale employment land, to provide for balanced growth. This will be located at Deangate Retail Park, east of Hoo, and in conjunction with the neighbourhood centres.

Subsequent design principles

22. Medway Council and the Hoo Consortium will collaborate to produce a Hoo Planning Framework, including a masterplan, to guide planning applications and further approval of details.

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
HHH5	Land east of Beacon Hill Lane	Residential	Up to 50	1-5, 6-10
HHH6	Land north-west Ratcliffe Highway, Chattenden	Residential Primary school	Up to 550	1-5, 6-10
HHH8	Land west of Hoo St Werburgh	Residential and supporting commercial	Up to 450	1-5, 6-10
HHH11	Land west of Hoo, adjacent to Vidgeon Avenue	Residential	Up to 240	1-5

Policy SA8: Hoo St Werburgh and Chattenden				
HHH12	Land south of Main Road, Hoo St Werburgh	Residential Community facility	Up to 1,801	1-5, 6-10, 11-15
HHH22 & HHH31	Land either side of Roper's Lane, Hoo St Werburgh	Residential Employment Secondary school Community facility Retail	Up to 1,700	1-5, 6-10, 11-15, 15+
HHH24	Land north of Stoke Road and east of Walnut Tree Grove, Hoo St Werburgh	Residential	Up to 85	1-5, 6-10
HHH25	Adjacent to Yew Tree Lodge land to the south of Stoke Road, Hoo	Residential	Up to 80	1-5
HHH32	Abbots Court, Hoo St Werburgh	Residential	Up to 3	1-5
HHH33	Land south of Stoke Road adjacent Jacobs Lane	Residential Community facility	Up to 330	6-10, 11-15
HHH41	Parcel south of Ratcliffe Highway, Hoo St Werburgh	Residential	Up to 25	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA8	+/-	+	+/-	-	-	--	++	-	0	+	++	++

K.2.8.4 The sites allocated under Policy SA8 will collectively result in the delivery of approximately 4,700 new homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.8.5 Policy SA8 also includes provision of employment uses at Site HHH22 & HHH31, as well as supporting commercial and retail offer in other locations, which could provide some local employment opportunities and boost economic vitality and spending within the local area. A major positive impact on the economy (SA Objective 12) is identified.

K.2.8.6 Given their rural location, the allocated sites around Hoo St Werburgh and Chattenden have somewhat limited access to existing services and infrastructure. The majority of sites allocated under Policy SA8 are located outside of the recommended sustainable distance

to existing healthcare and leisure facilities, schools and railway stations. However, the policy highlights the delivery of new primary and secondary schools, as well as community services including health and leisure facilities. The policy will also ensure provision of new sports facilities, enhanced GI, active travel routes, improved bus services, and safeguarding of land adjacent to the railway line with potential for future reinstating of passenger services. These measures will provide opportunities for outdoor exercise and recreation, and additionally encourage sustainable transport choices leading to improved access to new and existing local services and facilities. Overall, a major positive impact is identified for education (SA Objective 11), and a minor positive impact for transport and accessibility (SA Objective 10). However, a minor negative impact is likely to remain in terms of access to health facilities, given the distance to GP surgeries and emergency healthcare (SA Objective 8).

K.2.8.7 Policy SA8 requires a landscape-led approach to development, and retention of a landscape corridor to maintain separation between Hoo and Chattenden. A GI strategy will be required to inform the development, drawing on the area's historic significance as described in Historic England England's 'Hoo Peninsula Historic Landscape Project'[19]. Several sites allocated under Policy SA8 lie in an area of 'high' sensitivity and 'medium-high' / 'high' capacity (HHH12, HHH32, HHH5) or 'medium' sensitivity and capacity (HHH6, HHH11, HHH41, HHH8) according to the Hoo Landscape Sensitivity and Capacity Study[20], indicating that the landscape and/or visual characteristics are vulnerable to change. On balance, Policy SA8 is identified to result in a negligible impact on cultural heritage (SA Objective 9) and a minor negative impact on the landscape (SA Objective 4).

K.2.8.8 The proposed public transport and active travel enhancements may help to reduce reliance on private cars to some extent. The enhanced GI and ecological provisions could potentially help to reduce exposure of site end users to transport-associated air and noise pollution along the A228, alongside junction improvements and traffic calming to reduce congestion. However, an increase in domestic and vehicular emissions is likely to some extent as a result of the large-scale development in an area largely reliant on road-based travel until the railway station can be secured. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. A minor negative impact on air pollution (SA Objective 5) is identified.

K.2.8.9 Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated GHG emissions depending on the development design and the level of uptake of new sustainable transport initiatives as well as the noted "*potential to deliver a district heating network to support sustainable energy infrastructure*".

K.2.8.10 The majority of sites allocated under Policy SA8 lie on land of ALC Grade 1, which represents some of Medway's BMV agricultural land. A major negative impact on soil resources is identified (SA Objective 6).

K.2.8.11 All sites allocated under Policy SA8 lie wholly in Flood Zone 1 and in areas with insignificant surface water flood risk. Furthermore, a range of GI enhancements are set

[19] Historic England (various dates) Hoo Peninsula Historic Landscape Project. Available at: https://historicengland.org.uk/research/current/discover-and-understand/rural-heritage/hoo-peninsula/ [Date accessed: 16/06/25]

[20] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 16/06/25]

out in the policy that may help to improve resilience to flooding and heat risk. A minor positive impact on climate change adaptation is identified (SA Objective 2).

K.2.8.12 Policy SA8 requires preparation of a strategic environmental management plan to safeguard and strengthen the surrounding biodiversity designations, including the nearby Medway Estuary and Marshes SPA / Ramsar. Whilst the provision of new community parkland and wetland habitat will be likely help to mitigate recreational impacts on the European sites, the Regulation 19 HRA[21] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA8 on biodiversity (SA Objective 3) is uncertain.

K.2.9 Policy SA9: High Halstow

K.2.9.1 Policy SA9 sets out three sites to be allocated in the High Halstow area. Two of these sites have been evaluated in the SA process as non-strategic sites, and one as a strategic site. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix F** and **G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.9.2 **Table K.2.9** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.9.3 The following assessment considers the extent to which the provisions of Policy SA9 will further improve sustainability of these sites.

Table K.2.9: *Post-mitigation assessment of sites allocated under Policy SA9 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
HHH15	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	+	+
HHH29	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	0	+
HHH26	Strategic	+/-	+	+/-	-	--	--	++	-	0	-	+	++

Policy SA9: High Halstow

Objective

1. By 2041, High Halstow will have grown as a village, providing up to 820 new homes, a new primary school, attractive multi-functional green infrastructure and an additional centre providing commercial and community services. New development will be successfully integrated with the existing village and the surrounding countryside.

Criteria

2. Development of the two sites (HHH26 and HHH29) will be brought forward in accordance with a masterplan for the combined area.

[21] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

Policy SA9: High Halstow

3. Development will be designed to successfully integrate new and existing communities in the village, through design and community facilities. Development should ensure maximum connectivity and permeability between the site and existing village, such that it is well-integrated with and becomes part of the village, optimising connectivity to and the viability of the village centre.
4. Development will retain the distinct identity of High Halstow as an historic village, and avoid coalescence with nearby settlements, through planning for landscape buffers and interface with the countryside setting, seeking opportunities to enhance landscape character.
5. Any new development should respect the village feel, should be of a high quality of design and provide defined character areas that reflect variety in house types, layout, density and landscaping.
6. Housing shall meet local needs, with reference to the Medway Local Housing Needs Assessment, 2025, and other local evidence, such as in the preparation of the Neighbourhood Plan, or subsequent updates. Development will provide a mix of types and designs of homes, including houses, bungalows, affordable homes and opportunities for self-build.
7. Development will provide for a new two form entry primary school in accordance with the latest IDP, located by the new centre, with clear and attractive links to the existing village. The additional centre will complement the historic village centre, and provide space for retail, wider commercial and community facilities.
8. Development will be landscape-led and respond to the countryside setting and provide high quality green infrastructure that retains the rural character of the village, and embeds sustainable drainage and active travel in the design.
9. New open space will be provided in accordance with the Fields in Trust standards as set out in Policy DM21, and designed to integrate with the rural setting.
10. Development shall be designed to ensure strong integration and permeability for pedestrians, cyclists and provision for improved public transport.
11. Development will support the improvement of bus services to provide effective sustainable transport links for the village, with consideration of expansion of fast-track bus services linked to the urban area.
12. The primary vehicular access will be from the roundabout by Christmas Lane. In addition to site specific transport requirements, developers will contribute to the delivery of highways mitigations to provide capacity to accommodate growth at:
    - Four Elms roundabout
    - Main Road, Hoo, junction with A228
    - Dux Court Road/Bells Lane junction with A228
    - Ropers Lane junction with A228

Subsequent design principles

The applicant will produce a masterplan, to be approved by Medway Council, to guide planning applications and further approval of details. The masterplan will be informed by a green infrastructure strategy and an open space plan.

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
HHH15	Land adjoining 35 Cooling Road, High Halstow	Residential	Up to 5	1-5
HHH26	North of Christmas Lane, east of High Halstow	Residential Education Community and commercial floorspace	Up to 760	1-5, 6-10, 11-15

Policy SA9: High Halstow				
HHH29	Parcel north of Christmas Lane, High Halstow	Residential	Up to 55	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA9	+/-	+	+/-	-	-	--	++	-	0	+	+	+

K.2.9.4 The sites allocated under Policy SA9 will collectively result in the delivery of approximately 820 new homes, including a mixture of housing types and affordable homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.9.5 Policy SA9 also sets out the provision of a new centre to include retail, commercial and community facilities at Site HHH26, which could provide some local employment opportunities and boost economic vitality and spending within High Halstow. A minor positive impact on the economy (SA Objective 12) could therefore be achieved.

K.2.9.6 Given their rural location, the allocated sites around High Halstow have somewhat limited access to existing services and infrastructure. The majority of sites allocated under Policy SA9 are located outside of the recommended sustainable distance to existing healthcare and leisure facilities, schools and railway stations. However, the policy highlights the delivery of a new primary school and community services, alongside GI and open space. The policy will also ensure provision of improved sustainable transport options including bus services and active travel links. These measures will provide opportunities for outdoor exercise and recreation, and additionally encourage sustainable transport choices leading to improved access to new and existing local services and facilities. Overall, a minor positive impact is identified for transport and accessibility and education (SA Objectives 10 and 11). However, a minor negative impact is likely to remain in terms of access to health facilities, given the distance to GP surgeries and emergency healthcare (SA Objective 8).

K.2.9.7 Policy SA9 requires a landscape-led approach to development, including landscape buffers to avoid coalescence of settlements and integrate development within its rural setting, complementing the existing historic village centre. A GI strategy will be required to inform the development. All three sites allocated under Policy SA9 lie in an area of 'medium' sensitivity and capacity according to the Hoo Landscape Sensitivity and Capacity Study[22], indicating that the landscape and/or visual characteristics are vulnerable to change to some extent, although specific types of development can be accommodated without significant change. On balance, Policy SA9 is identified to result in a negligible

[22] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 16/06/25]

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impact on cultural heritage (SA Objective 9) and a minor negative impact on the landscape (SA Objective 4).

K.2.9.8 The proposed public transport and active travel enhancements may help to reduce reliance on private cars to some extent. The enhanced GI and open space could potentially help to reduce exposure of site end users to transport-associated air and noise pollution along the A228, alongside junction improvements and traffic calming to reduce congestion. However, an increase in domestic and vehicular emissions is likely to some extent as a result of the large-scale development in an area largely reliant on road-based travel. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. A minor negative impact on air pollution (SA Objective 5) is identified.

K.2.9.9 Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated GHG emissions depending on the development design and the level of uptake of new sustainable transport initiatives.

K.2.9.10 The three sites allocated under Policy SA9 lie on land of ALC Grade 1, which represents some of Medway's BMV agricultural land. A major negative impact on soil resources is identified (SA Objective 6).

K.2.9.11 All sites allocated under Policy SA9 lie wholly in Flood Zone 1 and in areas with insignificant surface water flood risk. Furthermore, GI enhancements set out in the policy may help to improve resilience to flooding and heat risk. A minor positive impact on climate change adaptation is identified (SA Objective 2).

K.2.9.12 The Regulation 19 HRA[23] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA9 on biodiversity (SA Objective 3) is uncertain.

K.2.10 Policy SA10: Lower Rainham

K.2.10.1 Policy SA10 sets out three sites to be allocated in the Lower Rainham area. Two of these sites have been evaluated in the SA process as non-strategic sites, and one as a strategic site. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix F** and **G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.10.2 **Table K.2.10** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.10.3 The following assessment considers the extent to which the provisions of Policy SA10 will further improve sustainability of these sites.

Table K.2.10: *Post-mitigation assessment of sites allocated under Policy SA10 (extracted from* ***Appendix I****)*

[23] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

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		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
RN17	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN9	Strategic	+/-	+	+/-	-	--	--	++	+	0	++	++	++
RN23	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	+	+	+

Policy SA10: Lower Rainham

Objective

1. By 2033, the development of Rainham Parkside Village (RN9) will provide a green backdrop to the adjacent marshes at Riverside Country Park, with improved connections for people and nature.

Criteria

2. Rainham Parkside Village (RN9) will include:
    a. Up to 750 new homes.
    b. A local centre commensurate with a new community of up to 750 new homes, including:
        i. a children's nursery;
        ii. 3 ha of land for a two-form entry primary school in accordance with the latest IDP;
        iii. a Community Hub;
        iv. a Health Hub;
        v. a care home; and
        vi. convenience floorspace that meets the day-to-day needs of the local community only.
    c. Up to 15 homes for use as temporary living accommodation.
3. 8 ha of land for an eight-form entry secondary school in accordance with the latest IDP.
4. A Habitats Regulations Assessment and, if required, compensation and/or mitigation will be agreed with Natural England and Medway Council.
    a. The requirements in policies S2 and S3 must be applied, given the sensitive location.
    b. Any enhancement in waterfront accessibility will have no adverse impact upon the integrity of the Special Protection Area and Ramsar designations, either alone or in-combination.
5. An open space strategy, including long-term management plans, could identify opportunities for off-site outdoor sports provision.
    a. A Community Use Agreement with the new primary and secondary schools would help to ensure access to playing pitches and the most efficient use of land.
6. A green infrastructure strategy will inform the overall design and layout.
    a. Internal landscaping will respond to the local landscape character, including multifunctional ecological, drainage and active travel corridors.
    b. The western edge will be defined by a strong defensible landscape buffer to deter development proposals in Lower Twydall.
    c. The specification of a buffer strip to screen the railway, and to provide an east-west leisure route, will be agreed with Medway Council.
    d. The provision of street trees – plus the design, placement and species to be used – will be aligned with a street hierarchy.
    e. The management of green infrastructure will be secured by Section 106 agreement.

Policy SA10: Lower Rainham

7. The strategy and guidance set out in the Medway Landscape Character Assessment (2024) for Lower Rainham will inform the design and layout. Uncharacteristic coniferous planting and fencing will be resisted.
8. The design and layout of streets will follow a hierarchy:
    a. The existing Pump Lane will be the primary vehicular accesses and street connecting Lower Rainham Road to Beechings Way. The existing northern end of Pump Lane will be converted to a one-way route to enhance the setting of the listed building. A short new segment will relieve traffic from the northern end of Pump Lane.
    b. A series of lower order 'Field Streets', which reference the former field lines, will provide vehicular connections across the site.
    c. The widening of Lower Twydall Lane and Lower Bloors Lane will be explored in subsequent detailed design.
    d. Pedestrian connections to/from Twydall via the two existing railway footbridges at Lower Twydall Lane and Lower Bloors Lane will be improved.
9. Have regard to the setting of the Lower Twydall and Lower Rainham conservation areas and nearby listed buildings.
10. SME housebuilders will deliver Rainham Parkside Village, overseen by a master SME developer. Development will come forward in bespoke SME-sized parcels with associated SME Partners under an SME Framework.

Subsequent design principles

11. The applicant will produce a masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details. The masterplan will be informed by a Rural Design Code, a green infrastructure strategy and an open space strategy.

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
RN9	Pump Farm and Bloors Farm	Residential A children's nursery A two-form entry primary school An eight-form entry secondary school Community Hub Health Hub Care home Convenience floorspace	Up to 750 homes	1-5, 6-10
RN17	R/O Queencourt Close / Berengrave Lane, Rainham	Residential	Up to 32 homes	1-5
RN23	Land west of Station Road, Rainham	Residential	Up to 75 homes	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA10	+/-	+	+/-	-	-	--	++	0	0	+/-	++	+

K.2.10.4 The sites allocated under Policy SA10 will collectively result in the delivery of approximately 857 new homes towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.10.5 Policy SA10 also sets out the provision of a new centre to include convenience floorspace and community facilities at Site RN9, which could provide some local employment opportunities and boost economic vitality and spending within Lower Rainham. A minor positive impact on the economy (SA Objective 12) could therefore be achieved.

K.2.10.6 The Rainham area is expected to provide relatively good sustainable access to local facilities, schools and healthcare facilities. The sites allocated under Policy SA10 are located at the edge of Rainham's existing settlement, some of which lie outside of the recommended sustainable distance to GP surgeries, hospitals or schools. Policy SA10 sets out the provision of a new primary school, secondary school and "*health hub*", alongside new open space and sports facilities, and active travel corridors. These measures will provide opportunities for outdoor exercise and recreation, and additionally encourage sustainable transport choices leading to improved access to local services and facilities, including healthcare facilities in the wider Rainham area and at the new health hub. Overall, a major positive impact is identified for education (SA Objective 11) and a negligible impact in terms of health (SA Objective 8). Although the policy sets out benefits for local accessibility, the implications of development (in the current undeveloped agricultural landscape) on the already constrained highways network in Lower Rainham[24] results in uncertainty in the effect against SA Objective 10.

K.2.10.7 Policy SA10 requires development to be guided by a GI strategy, ensuring that development is informed by the Medway Landscape Character Assessment[25] guidance and provides a landscape buffer to maintain separation of settlements. The Landscape Character Assessment highlights the current tranquillity of the Lower Rainham area and its role in providing a green backdrop to the adjacent marshes and recommends to "*avoid large scale urban/housing extensions within this working rural agricultural landscape characterised by its low-density dispersed settlement pattern*". Without further detail on the site layout and design, a minor negative impact on the landscape (SA Objective 4) cannot be ruled out.

K.2.10.8 Although some listed buildings lie in proximity to Site RN9, potential impacts are anticipated to be avoided or mitigated in line with other MLP policies. A negligible impact is identified on cultural heritage (SA Objective 9).

[24] Jacobs (2025) Medway Transport Model – Medway LP Regulation 19 Summary. Draft, June 2025.

[25] LUC (2024) Medway Landscape Character Assessment. Available at: https://medway.oc2.uk/docfiles/20/Landscape%20Character%20Assessment.pdf [Date accessed: 17/06/25]

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K.2.10.9 The proposed active travel enhancements may help to reduce reliance on private cars to some extent. The enhanced GI, including street trees and a landscape buffer, will be likely to contribute towards improved local air quality. However, an increase in domestic and vehicular emissions is likely to some extent as a result of the large-scale development. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. A minor negative impact on air pollution (SA Objective 5) is identified.

K.2.10.10 Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated GHG emissions depending on the development design and the level of uptake of new sustainable transport initiatives.

K.2.10.11 All three sites allocated under Policy SA10 lie on land of ALC Grade 1 or 2, representing some of Medway's BMV agricultural land. A major negative impact on soil resources is identified (SA Objective 6).

K.2.10.12 All sites allocated under Policy SA10 lie wholly in Flood Zone 1 and in areas with insignificant surface water flood risk. Furthermore, a range of GI enhancements are set out in the policy that may help to improve resilience to flooding and heat risk. A minor positive impact on climate change adaptation is identified (SA Objective 2).

K.2.10.13 Policy SA10 seeks to ensure multi-functional GI is provided, to include ecological benefits. However, the Regulation 19 HRA[26] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA10 on biodiversity (SA Objective 3) is uncertain.

K.2.11 Policy SA11: Rural Settlements

K.2.11.1 Policy SA11 sets out seven sites to be allocated in the rural settlements of All Saints, Cuxton, Cliffe and Cliffe Woods. All of these sites have been evaluated in the SA process as non-strategic sites. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.11.2 **Table K.2.11** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.11.3 The following assessment considers the extent to which the provisions of Policy SA11 will further improve sustainability of these sites.

Table K.2.11: *Post-mitigation assessment of sites allocated under Policy SA11 (extracted from **Appendix I**)*

[26] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
AS11	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS25	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	+	+
CHR14	Non-strategic	+/-	-	-	-	-	-	+	-	0	+	0	+
SR14	Non-strategic	+/-	+	-	-	-	-	+	-	0	-	+	+
SR4	Non-strategic	+/-	+	+/-	-	-	-	++	-	0	+	0	+
SR51	Non-strategic	+/-	+	-	-	-	--	++	-	0	-	+	+
SR7	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	0	+

Policy SA11: Rural Settlements

Objective

1. By 2041, development allocations in Medway's rural area will provide for diversification of housing choice in villages, meeting the needs of rural communities.

Criteria

2. The requirements in policies S2 and S3 must be applied, given the sensitive locations.

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
AS11	Land at The Street, Stoke, Rochester	Residential	Up to 10	1-5
AS25	Land west of Edinburgh Road, Grain	Residential	Up to 34	1-5
CHR14	Port Medway Marina, Cuxton	Residential	Up to 49	1-5, 6-10
SR4	North Little Church Road, west of Town Road, Cliffe Woods	Residential	Up to 130	1-5
SR7	West of Woodlands development, Town Road, Cliffe	Residential	Up to 44	1-5
SR14	Land south of View Road, Cliffe Woods	Residential	Up to 49	1-5
SR51	Land to the east and west of Church Street, Cliffe	Residential	Up to 250	1-5, 6-10

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA11	+/-	-	+/-	-	-	--	++	-	0	-	0	+

K.2.11.4 The sites allocated under Policy SA11 will collectively result in the delivery of approximately 566 new homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.11.5 Given their rural location, the allocated sites under Policy SA11 have somewhat limited access to existing services and infrastructure. Some of the sites allocated under Policy SA11 are located outside of the recommended sustainable distance to existing healthcare and leisure facilities, schools and railway stations. However, all sites lie within the recommended sustainable distance to employment opportunities and further growth around Medway's smaller villages may help to maintain viability of their local economies. The provisions of other MLP policies with regard to transport improvements, and new/expanded schools and other services, will benefit the sites to some extent. Overall, a minor positive impact is identified for the economy (SA Objective 12), and a negligible impact in terms of access to schools (SA Objective 11). However, a minor negative impact is likely to remain in terms of access to health facilities, given the distance to GP surgeries and emergency healthcare (SA Objective 8), and in terms of transport given the likely reliance on road-based travel in the rural area.

K.2.11.6 Despite the positive provisions of wider MLP policies in conserving Medway's landscapes, it is likely that growth around the smaller settlements will disrupt views and change the rural character to some extent. A minor negative impact on the landscape (SA Objective 4) is identified.

K.2.11.7 Although some listed buildings lie in proximity to some of the rural allocations, potential impacts are anticipated to be avoided or mitigated in line with other MLP policies. A negligible impact is identified on cultural heritage (SA Objective 9).

K.2.11.8 An increase in domestic and vehicular emissions is likely to some extent as a result of the proposed development in areas largely reliant on road-based travel. A minor negative impact on air pollution (SA Objective 5) is identified. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated GHG emissions depending on the development design and the level of uptake of new sustainable transport initiatives encouraged by other MLP policies.

K.2.11.9 The sites allocated under Policy SA11 lie on land of ALC Grades 1, 2 and/or 3 (including SR51 situated wholly upon Grade 1 land) which is likely to include some of Medway's BMV agricultural land. A major negative impact on soil resources is identified (SA Objective 6).

K.2.11.10 Although the majority of sites lie wholly in Flood Zone 1 where fluvial/tidal flood risk is low, one site is located largely in Flood Zone 3 (Site CHR14, where 62% of the site area lies in Flood Zone 3 and 2% in Flood Zone 2). Wider MLP policies will be expected to minimise

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flood risk in accordance with national policy. However, there remains potential for a minor negative impact on climate change adaptation (SA Objective 2). A detailed flood risk assessment will be required, in line with the recommendations of the SFRA[27].

K.2.11.11 Site CHR14 lies adjacent to the River Medway MCZ. Site SR51 lies adjacent to the Thames Estuary and Marshes SPA / Ramsar site. Site SR14 lies adjacent to Chattenden Woods and Lodge Hill SSSI. Wider MLP policies, including Policies S2 and S3, will be expected to ensure that adverse effects on the European sites associated with urbanisation and water quality/quantity are mitigated. However, the Regulation 19 HRA[28] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA11 on biodiversity (SA Objective 3) is uncertain. Additionally, the implications of development in proximity to Chattenden Woods and Lodge Hill SSSI remain uncertain at the time of writing pending further discussion with Natural England on the emerging Hoo Peninsula Strategic Environmental Programme.

K.2.12 Policy SA12: Other Sites

K.2.12.1 Policy SA12 sets out 23 relatively small-scale sites to be allocated in and around various settlements including All Saints, Fort Pitt, Gillingham, North Rainham, Rochester and Watling. All of these sites have been evaluated in the SA process as non-strategic sites. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.12.2 **Table K.2.12** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.12.3 The following assessment considers the extent to which the provisions of Policy SA12 will further improve sustainability of these sites.

Table K.2.12: *Post-mitigation assessment of sites allocated under Policy SA12 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
AS2	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	0	+
AS28	Non-strategic	+/-	-	-	-	-	-	+	-	0	-	+	+
AS6	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	0	+
FP6	Non-strategic	+/-	+	+/-	+/-	-	+	++	-	0	++	+	+
GN8	Non-strategic	+/-	+	+/-	+/-	-	-	+	-	0	+	+	+
GS35	Non-strategic	+/-	+	+/-	-	-	+	+	-	0	++	+	+

[27] Herrington (2025) Level 2 Strategic Flood Risk Assessment – Medway Council. Draft, May 2025.

[28] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

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		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
HW6	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	0	+
LW2	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	-	+	+
REWW3	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RN22	Non-strategic	+/-	+	+/-	+/-	+/-	-	+	-	0	++	+	+
RN24	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RN28	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN29	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	+	+	+
RN30	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RN31	Non-strategic	+/-	+	+/-	-	-	-	+	-	0	+	+	+
RWB11	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB12	Non-strategic	+/-	+	+/-	+/-	-	+	+	-	0	++	+	+
RWB2	Non-strategic	+/-	-	-	-	-	-	+	-	0	-	+	+
RWB25	Non-strategic	+/-	-	-	-	-	+	++	-	0	++	+	+
SR48	Non-strategic	+/-	-	-	-	-	+	+	-	0	-	+	+
SR49	Non-strategic	+/-	-	-	-	-	-	+	-	0	-	+	+
W4	Non-strategic	+/-	+	+/-	+/-	+/-	+	+	+	0	++	+	+
W7	Non-strategic	+/-	+	+/-	+/-	-	-	+	-	0	++	+	+

Policy SA12: Other Sites

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes within plan period	Plan period (Years)
AS2	Fenn Farm Yard, St Mary Hoo, Rochester	Residential	Up to 4	1-5
AS28	Land west of Port Victoria Road, Grain	Residential	Up to 9	1-5
AS6	Adjacent to Fenn Street and Ratcliffe Highway, St Mary Hoo	Residential	Up to 40	1-5, 6-10
FP6	Former University College for Creative Arts, Fort Pitt, Rochester	Residential	Up to 102	1-5
GN8	176 Grange Road, Gillingham	Residential	Up to 17	1-5
GS35	Former factory, 111 Rainham Road	Residential	Up to 12	1-5
HW6	Blowers Wood, Maidstone Road, Hempstead	Residential	Up to 88	1-6, 6-10
LW2	419 Walderslade Road, Walderslade	Residential	Up to 18	1-5

Policy SA12: Other Sites				
REWW3	Miles Place, Delce Road, Rochester	Residential	Up to 11	1-5
RN22	311 Station Road, Rainham	Residential	Up to 8	1-5
RN24	33 High Dewar Road, Rainham	Residential	Up to 9	1-5
RN28	Moor Street, Rainham	Residential	Up to 66	1-5
RN29	Chestnut Court, Otterham Quay Lane, Rainham	Residential	Up to 14	1-5
RN30	Land north of railway line and west of Seymour Road, Rainham	Residential	Up to 90	1-5
RN31	Land west of Seymour Road, Rainham	Residential	Up to 80	1-5
RWB2	Medway Bridge, Marina Manor Lane, Rochester	Residential	Up to 5	1-5
RWB11	1-4 Eastgate Court, Rochester	Residential	Up to 3	1-5
RWB12	22-26 Victoria Street, Rochester	Residential	Up to 36	1-5
RWB25	Acorn Wharf Shipyard, Rochester Riverside	Residential	Up to 132	1-6, 6-10
SR48	Patmans Wharf, Upnor Road, Upnor	Residential	Up to 8	1-5
SR49	Lower Upnor Riverside opposite Brissenden Close	Residential	Up to 6	1-5
W4	41 Barnsole Road, Gillingham	Residential	Up to 5	1-5
W7	Canada House, Barnsole Road, Gillingham	Residential	Up to 21	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA12	+/-	-	+/-	-	-	-	++	-	0	-	+	+

K.2.12.4 The sites allocated under Policy SA12 will collectively result in the delivery of approximately 784 new homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.12.5 The majority of sites allocated under Policy SA12 are located in areas with relatively good sustainable access to employment opportunities and schools. However, some sites lie beyond the recommended sustainable distances to existing GP surgeries, hospitals, leisure facilities, and railway stations. The provisions of other MLP policies with regard to transport improvements, and new/expanded services, will benefit the sites to some extent. Overall, a minor positive impact is identified for education and the economy (SA Objectives 11 and 12). However, a minor negative impact is likely to remain in terms of access to health facilities, given the distance to GP surgeries and emergency healthcare (SA

Objective 8), and in terms of transport given the likely reliance on road-based travel in the rural area for the sites that lie in more peripheral areas.

K.2.12.6 The majority of sites allocated under Policy SA12 do not lie in areas of Medway known to be sensitive to development. Only Site AS6 lies in an area of 'medium' sensitivity and capacity, according to the Hoo Landscape Sensitivity and Capacity Study[29], indicating that the landscape and/or visual characteristics are vulnerable to change to some extent, although specific types of development can be accommodated without significant change. Irrespective of this, and the positive provisions of other MLP policies in minimising harm to the landscape, the introduction of a number of sites across Medway including some smaller rural settlements, will be likely to cumulatively alter the surrounding character and views, to some extent. A minor negative impact on the landscape is identified (SA Objective 4).

K.2.12.7 Although some designated heritage assets lie in proximity to some of the allocations under Policy SA12, potential impacts are anticipated to be avoided or mitigated in line with other MLP policies. A negligible impact is identified on cultural heritage (SA Objective 9).

K.2.12.8 An increase in domestic and vehicular emissions is likely to some extent as a result of the proposed development that includes some areas largely reliant on road-based travel. A minor negative impact on air pollution (SA Objective 5) is identified. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from domestic and transport associated GHG emissions depending on the development design and the level of uptake of new sustainable transport initiatives encouraged by other MLP policies.

K.2.12.9 Policy SA12 includes a number of sites located on previously developed land, or lower-quality soils, thereby helping to promote an efficient use of land. However, some sites lie on land of ALC Grades 1, 2 and/or 3 (including AS2, AS6, RN30 and RN31 situated wholly upon Grade 1 land) which is likely to include some of Medway's BMV agricultural land. On balance, a minor negative impact on soil resources is identified (SA Objective 6).

K.2.12.10 Although the majority of sites lie wholly in Flood Zone 1 where fluvial/tidal flood risk is low, some lie in areas of flood risk (Site RWB25 wholly in Flood Zone 3; Site RWB2 61% in Zone 3 and 7% in Zone 2; Site SR48 55% in Zone 3 and 45% in Zone 2; Site SR49 39% in Zone 3 and 17% in Zone 2; and Site AS28 31% in Zone 3 and 7% in Zone 2). Wider MLP policies will be expected to minimise flood risk in accordance with national policy. However, there remains potential for a minor negative impact on climate change adaptation (SA Objective 2). A detailed flood risk assessment will be required, in line with the recommendations of the SFRA[30].

K.2.12.11 Site AS28 lies adjacent to the Medway Estuary and Marshes SPA / Ramsar site. Sites RWB2, RWB25, SR48 and SR49 lie adjacent to the River Medway MCZ. Wider MLP policies, including Policies S2 and S3, will be expected to ensure that adverse effects on the European sites associated with urbanisation, recreation and water quality/quantity are

[29] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 16/06/25]

[30] Herrington (2025) Level 2 Strategic Flood Risk Assessment – Medway Council. Draft, May 2025.

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mitigated. However, the Regulation 19 HRA[31] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA12 on biodiversity (SA Objective 3) is uncertain.

K.2.13 Policy SA13: Frindsbury Peninsula Opportunity Area

K.2.13.1 Policy SA13 sets out one site to be allocated as an 'opportunity area' on the Frindsbury Peninsula. This site has been evaluated in the SA process as a strategic site. The full assessment of the site, alongside other reasonable alternatives, can be found in **Appendix F** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.13.2 **Table K.2.13** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.13.3 The following assessment considers the extent to which the provisions of Policy SA13 will further improve sustainability of these sites.

Table K.2.13: *Post-mitigation assessment of the site allocated under Policy SA13 (extracted from **Appendix I**)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
SR53	Strategic	+/-	+/-	-	+/-	--	-	++	-	0	+	+	+

Policy SA13: Frindsbury Peninsula Opportunity Area

Objective

1. An initial phase of development will be delivered in the latter part of the plan period, following the managed release and relocation of some existing businesses, providing a catalyst for a landmark mixed-use regeneration area extending beyond the plan period.

Criteria

2. The Frindsbury Peninsula (SR53) will include:
    a. An initial phase of development of up to 690 new homes within the plan period as part of a large-scale, mixed-use regeneration area.
        i. An initial phase of development will not jeopardise future opportunities identified on the Frindsbury Peninsula Concept Plan.
        ii. The planning application(s) for an initial phase of development will be guided by a Frindsbury Peninsula Planning Framework.
3. The requirements in policies S2 and S3 must be applied, given the sensitive location.
4. Have regard to the setting of the Chatham Historic Dockyard, Frindsbury and Manor Farm and Star Hill to Sun Pier conservation areas, scheduled monuments at Chatham Historic Dockyard and nearby listed buildings.

Subsequent design principles

[31] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

Policy SA13: Frindsbury Peninsula Opportunity Area
5. Medway Council will produce a Frindsbury Peninsula Planning Framework by 2030/31 to manage the medium to long-term redevelopment of MCE, including a riverside strategy, an economic strategy and the delivery of strategic flood risk infrastructure.

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA13	+/-	+/-	-	+/-	--	-	++	-	0	+	+	+

K.2.13.4 The opportunity area allocated under Policy SA13 has potential to deliver up to 690 homes, to make a significant contribution towards housing provision in Medway. A major positive impact is identified under SA Objective 7.

K.2.13.5 The Council envisages that in the longer term, the Frindsbury Peninsula location will serve as a "*landmark mixed-use regeneration area*". Policy SA13 states that the development will be guided by an economic strategy, and where required some existing businesses will be relocated. A minor positive impact on the economy is identified (SA Objective 12).

K.2.13.6 Policy SA13 explains that the Council will be producing a Planning Framework to guide the redevelopment of the Frindsbury Peninsula. This will include delivery of strategic flood risk infrastructure and a riverside strategy. These schemes will have the potential to lead to longer term benefits across several topics, including climate change adaptation (SA Objective 2), biodiversity (SA Objective 3), local landscape character and appearance (SA Objective 4), water quality (SA Objective 5), and active travel (SA Objectives 8 and 10).

K.2.13.7 In absence of specific details at this stage, the assessment of Policy SA13 against the SA objectives is unchanged from the post-mitigation site assessment for Site SR53.

K.2.13.8 It is recommended that further details are incorporated into the policy to provide clarity on the purpose and content of the proposed Frindsbury Peninsula Planning Framework and how it will address the on-site challenges and opportunities.

K.2.14 Policy SA14: Employment Sites

K.2.14.1 Policy SA14 sets out nine sites to be allocated for employment use, in various locations across Medway. Six of these sites have been evaluated in the SA process as non-strategic sites, and three as strategic sites. Site SMI6 contains mixed uses including residential and employment and has been assessed as such in the SA process; the employment portion of the site only is allocated under Policy SA14. The full assessment of each site, alongside other reasonable alternatives, can be found in **Appendix F** and **G** (pre-mitigation) and **Appendix I** (post-mitigation).

K.2.14.2 **Table K.2.14** summarises the post-mitigation assessment, extracted from **Appendix I**, which takes into account the wider policy provisions set out in the MLP.

K.2.14.3 The following assessment considers the extent to which the provisions of Policy SA14 will further improve sustainability of these sites.

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Table K.2.14: *Post-mitigation assessment of sites allocated under Policy SA14 (extracted from* ***Appendix I****)*

		1	2	3	4	5	6	7	8	9	10	11	12
Site ref.	**Strategic / non-strategic**	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
CHR16	Non-strategic	+/-	+	+/-	-	-	-	0	-	0	+	0	0
CHR17	Non-strategic	+/-	+	+/-	+/-	-	-	0	-	0	+	0	++
CHR18	Non-strategic	+/-	+	+/-	-	-	+	0	-	0	+	0	0
FH1	Non-strategic	+/-	+	+/-	-	-	+	0	-	0	-	0	++
HHH19	Non-strategic	+/-	+	+/-	-	-	-	0	-	0	-	0	++
RWB5	Non-strategic	+/-	+	+/-	-	-	-	0	-	0	-	0	++
HHH35	Strategic	+/-	-	+/-	-	--	--	0	-	0	+	0	++
HHH36	Strategic	+/-	-	--	-	--	-	0	-	0	-	0	0
SMI6	Strategic	+/-	-	-	-	--	+	++	+	0	++	+	+

Policy SA14: Employment Sites

Objective

1. By 2041 new employment opportunities, distributed across Medway, will boost economic growth, address outward commuting and improve local wages in new sectors. As part of mixed-use schemes, new offices in town centres will support the regeneration agenda. An initial phase of development on the Frindsbury Peninsula will be coordinated with the emerging Kingsnorth Expansion Area.

Criteria

2. The Council will support a range of employment land uses, i.e. EG(iii), B2 and B8 and sui generis (of an employment nature), subject to accordance with all other relevant Local Plan policies.
3. Development proposals other than EG(iii), B2 and B8 and sui generis (of an employment nature) will only be supported where it is demonstrated that:
    a. There are no alternative locations.
    b. The proposed use is ancillary to the primary employment use of the individual building or site.
4. Kingsnorth Expansion Area is anticipated to be developed during the latter part of the plan period, i.e. after employment sites on previously developed land have been occupied.
    a. Kingsnorth Expansion Area (HHH35) will have regard to the Frindsbury Peninsula Planning Framework concerning the managed release and relocation of existing businesses at MCE.
5. The Council will support new offices in town centres, particularly Chatham, as part of mixed-use schemes.
6. The requirements in policies S2 and S3 must be applied, given the sensitive location. In addition, employment development proposals will assess the in-combination impact of industrial emissions (with traffic emissions) upon European sites specifically.

Subsequent design principles

7. Planning applications for Deangate Retail Park (Flanders Farm) (HHH19) and Kingsnorth Expansion Area (HHH35) will have regard to the Hoo Development Framework (2025).

Site-specific information

Policies Map ID	Name	Land uses and floorspace within plan period	Plan period (Years)

Policy SA14: Employment Sites			
CHR16	Cuxton Pit 1	EG(iii) / B2 / B8 / Sui generis (of an employment nature) - 25,300 sqm	6-10
CHR17	Cuxton Pit 2	EG(iii) / B2 / B8 / Sui generis (of an employment nature) - 14,600 sqm	6-10
CHR18	3 Acre Field	EG(iii) / B2 / B8 / Sui generis (of an employment nature) - 3,500 sqm	6-10
FH1	Innovation Park Medway	B2 - 11,248 sqm EG(iii) - 21,000 sqm	1-5, 6-10
HHH19	Deangate Retail Park (Flanders Farm)	B2 - 14,400 sqm	1-5
HHH35	Kingsnorth Expansion Area	EG(iii) / B2 / B8 / Sui generis (of an employment nature) - 157,000 sqm	11+
HHH36	MedwayOne (Former Kingsnorth Power Station)	EG(iii) / B2 / B8 / Sui generis (of an employment nature) as per the approved development parameters - 324,450 sqm	1-5, 6-10
RWB5	Land adjacent to Royal Mail Depot, Maidstone Road, Rochester	EG(iii) / B2 / B8 / Sui generis (of an employment nature) - 3,693 sqm	6-10
SMI6	Basin3 Campus, Chatham Waters	EG(iii) / B2 / B8 / Sui generis (of an employment nature) as per the approved development parameters - 31,000 sqm	1-5

	1	2	3	4	5	6	7	8	9	10	11	12
Site policy	CC Mitigation	CC Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy
SA14	+/-	-	+/-	-	--	--	0	-	0	-	0	++

K.2.14.4 The sites allocated under Policy SA14 will collectively result in the delivery of a range of employment land, including use classes EG(iii), B2 and B8 and sui generis, to make a significant contribution towards employment provision in Medway. The policy will ensure that, where required, existing businesses will be relocated, and applications for other uses including offices in town centres are supported where in accordance with other MLP policies. Overall, the policy will seek to provide a range of new floorspace, increasing job opportunities and boosting the local economy, leading to a major positive impact on SA Objective 12.

K.2.14.5 By supporting a range of business sectors, there may be opportunities for research, apprenticeships and development of skills. It is recommended that this could be

incorporated into the policy wording, or via cross-reference to other MLP policies such as Policy T12: Learning and Skills Development, to ensure such opportunities are sought where practicable. On balance, a negligible impact on education (SA Objective 11) is likely to be achieved at present.

K.2.14.6 The sites allocated under Policy SA14 are spread across Medway, with some situated in more peripheral areas including Sites HHH19 and HHH36 on the Hoo Peninsula, and Sites FH1 and RWB5 at the southern edge of Rochester. Therefore, some development will be located in areas beyond the recommended sustainable distance to existing transport infrastructure including railway stations. The majority of sites also lie beyond the recommended distance to open space, leisure and healthcare facilities. Although some site allocations (e.g., Site SMI6) lie in better-connected areas of Medway, and other MLP policies seek to improve sustainable transport links, overall, a minor negative impact on health and transport and accessibility is identified (SA Objectives 8 and 10).

K.2.14.7 Policy SA14 will increase employment land in the Plan area, including for uses which may require a greater number of trips for HGVs and commercial vehicles as well as private cars in terms of employees accessing the sites. One site, SMI6, lies within 200m of Gillingham AQMA where air pollution may be exacerbated without careful planning. Industrial uses supported by the policy may also lead to significant increases in emissions, including air and water pollution, depending on the specific end uses. The policy requires an assessment of the in-combination impact of industrial emissions alongside traffic emissions which may help to inform required mitigation measures, although this is targeted at European sites rather than wider air pollution implications. There is additionally potential for the proposed development to increase the risk of contamination of watercourses. Overall, the proposed development under Policy SA14 has potential to result in a major negative impact on pollution (SA Objective 5).

K.2.14.8 Similarly, in absence of further detail, the effect of development on climate change mitigation (SA Objective 1) remains uncertain, with potential adverse effects arising from industrial and transport associated GHG emissions. It is recommended that Policy SA14 could go further in supporting low-carbon or renewable technologies and sustainable design principles, as well as facilitating public transport access for employees of associated development where feasible.

K.2.14.9 While some sites allocated under the policy comprise previously developed land, some contain undeveloped land of ALC Grade 3, and Site HHH19 contains land of Grade 1. ALC Grade 1, and potentially Grade 3, represents some of Medway's BMV agricultural land. A major negative impact on soil resources is identified (SA Objective 6).

K.2.14.10 Some sites allocated under Policy SA14 lie partially in areas of flood risk: Site HHH35 (12% within Flood Zone 3 and 5% within Flood Zone 2), Site HHH36 (90% within Flood Zone 3 and 10% within Flood Zone 2), and Site SMI6 (69% within Flood Zone 3 and 10% within Flood Zone 2). Wider MLP policies will be expected to minimise flood risk in accordance with national policy. However, there remains potential for a minor negative impact on climate change adaptation (SA Objective 2). A detailed flood risk assessment will be required, in line with the recommendations of the SFRA[32].

K.2.14.11 Some allocations under this policy lie in close proximity to the Medway Estuary SPA / Ramsar site, including Site HHH36 where a small section of the site coincides with the

[32] Herrington (2025) Level 2 Strategic Flood Risk Assessment – Medway Council. Draft, May 2025.

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designation. Policy SA14 recognises the sensitive location of the allocations and cross-references to the requirements of Policies S2 and S3, which will be expected to ensure that adverse effects on the European sites associated with urbanisation, recreation and water quality/quantity are mitigated. However, the Regulation 19 HRA[33] has identified potential adverse effects arising from the proposed allocations in the MLP on air quality and recreation at European sites that will need to be investigated through further air quality modelling and a final Hoo Peninsula Strategic Environmental Programme. At the time of writing, the conclusions of the HRA process are not available and as such the effect of Policy SA14 on biodiversity (SA Objective 3) is uncertain.

K.2.14.12 The majority of sites allocated under Policy SA14 do not lie in areas of Medway known to be sensitive to development. Only Site HHH19 lies in an area of 'medium' sensitivity and capacity, according to the Hoo Landscape Sensitivity and Capacity Study[34], indicating that the landscape and/or visual characteristics are vulnerable to change to some extent, although specific types of development can be accommodated without significant change. Irrespective of this, and the positive provisions of other MLP policies in minimising harm to the landscape, the introduction of a large scale of employment development through Policy SA14 will be likely to alter the surrounding character and views, to some extent. A minor negative impact on the landscape is identified (SA Objective 4).

K.2.14.13 No known heritage assets lie within or immediately adjacent to the allocations, and potential impacts on nearby heritage assets are anticipated to be avoided or mitigated in line with other MLP policies. A negligible impact is identified (SA Objective 9).

K.2.14.14 The allocation of employment uses is unlikely to result in any change in housing provision. A negligible impact is identified under SA Objective 7.

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[33] Lepus Consulting (2025) Habitats Regulations Assessment of the Medway Local Plan 2041. Regulation 19 Consultation: Interim HRA Report. June 2025.

[34] Medway Council (2019) Hoo Landscape Sensitivity & Capacity Study Draft – February 2019. Available at: https://www.medway.gov.uk/downloads/file/6238/hoo_landscape_capacity_and_sensitivity_study [Date accessed: 16/06/25]

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