

# Sustainability Appraisal of the Medway Local Plan (2025-2041)

Regulation 18 Interim SA Report

Volume 1 of 2: Main Report

June 2024



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



# Sustainability Appraisal of the Medway Local Plan 2025 – 2041

## Volume 1 of 2: Regulation 18 Interim SA

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This report has been produced to evaluate the potential sustainability impacts of the Medway

Local Plan and meets the requirements of the SEA Regulations. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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# Acronyms and 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
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
GTTA	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
IPM	Innovation Park Medway
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
LTC	Lower Thames Crossing
LTP	Local Transport Plan
LWS	Local Wildlife Site

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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 <sub>2</sub>	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
WRMP	Water Resources Management Plan



# Executive Summary

## About this report

- E1 Lepus Consulting is conducting an appraisal process for Medway Council to help them prepare the Medway Local Plan (MLP). The appraisal process is known as Sustainability Appraisal (SA) and is prepared during a number of different stages to facilitate iteration between the Plan makers (Medway Council) and the appraisal team (Lepus Consulting). The process seeks to provide high level environmental protection and the different stages of plan making are mostly accompanied by consultation with statutory bodies, other stakeholders and the public.
- E2 SA is the process of informing and influencing the preparation of a development plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the plan.
- E3 This Regulation 18 Interim SA Report is being published following consultation with the statutory consultees between September and October 2023 on the SA Scoping Report, which identified the scope and level of detail to be included in the SA process going forward.
- E4 The purpose of this SA Report is **to assess the draft policies and options (or 'reasonable alternatives') as presented in the** Medway Local Plan Regulation 18 2024 Consultation document. This includes options for:
- Housing and employment growth (growth options);
  - Broad locations for new development (spatial delivery options);
  - The overall spatial distribution of new growth (spatial growth options); and
  - Development sites.
- E5 The assessment of reasonable alternatives is an important requirement of the SEA Regulations.

## Summary findings

- E6 Findings from the assessments are presented in a single-line matrix format to represent the likely significant effects in relation to each SA Objective within the SA Framework (see Appendix A).
- E7 The SA Framework sets out a range of environmental, economic and social measures as SA Objectives that are used in evaluating the potential impacts of the **Plan's proposals**. The high-level matrix is not a conclusive tool or model. Its main function is to identify at a strategic level whether or not the assessment requires a more detailed examination or whether satisfactory conclusions may be drawn from the high-level assessment without the need for further detailed analysis.
- E8 As required by the SEA Regulations, cumulative, indirect and synergistic effects are also identified and evaluated during the assessment, where relevant.

*Growth options*

E9 Medway Council have identified two reasonable alternatives for the total amount of housing and employment growth to be delivered through the emerging Local Plan, based on the latest available evidenced needs for the Plan area (excluding existing development commitments) and the unmet needs of the neighbouring authority of Gravesham:

- Option 1 – **Meet Medway’s Local Housing Need and Initial Objective** Assessment of Employment Land Need of c.22,643 homes and 274,663m<sup>2</sup> employment land.
- Option 2 – **As for Option 1, plus meeting Gravesham’s unmet need of c.2,000 homes.**

E10 It should be noted that, in the assessments of growth options, for the impact of each option to be fully understood details of the size, location and nature of the developments are required; as these options focus on quanta alone, the assessments are necessarily high level with restricted diagnostic conclusions. Some of the identified potential impacts may be able to be mitigated through the design of the developments.

E11 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. Similarly, pursuing a lower quantum of growth could potentially result in less pressure on transport and social infrastructure. In light of this, Option 1 has been identified as the better performing of the two options against the majority of the SA Objectives.

E12 In contrast, Option 2 has been identified as the better performing against SA Objective 7 (housing) owing to the proposed c.2,000 dwelling contribution towards the unmet needs of Gravesham Borough. This could lead to greater benefits than Option 1 in terms of delivering a suitable housing mix, including affordable homes, to meet the needs of the population.

E13 However, both growth options propose a similar level of growth and would satisfy the local development needs, with benefits for social and economic SA Objectives such as housing **and the economy. Given Medway’s environmental and transport constraints, both** options could lead to similar challenges in terms of accommodating the required level of growth whilst avoiding or minimising potential for adverse effects.

*Spatial delivery options*

E14 To inform the identification of spatial strategy options, Medway Council has considered distinct geographic locations within Medway and identified estimated ranges for the potential levels of growth that could be delivered within each of these broad areas. These numbers may be subject to change as the Plan progresses.

E15 **A total of 12 ‘spatial delivery options’ (SDOs) have been identified by the Council,** representing broad potential locations for new development across Medway, a combination of which could form a spatial strategy:

- Capstone Valley – 3,749-4,336 homes
- Chatham Docks – 3,000 homes

- Cliffe and Cliffe Woods – 2,079-2,406 homes
- East of Rainham – 1,243-1,432 homes
- Hoo Peninsula – 10,893-12,970 homes
- Medway City Estate – 1,092-1,502 homes
- Medway Valley – 1,264-1,457 homes
- North of Rainham – 2,560-3,275 homes
- North of Strood – 2,029-2,319 homes
- Suburban – 495-779 homes
- Urban – 7,719-8,542 homes
- Employment only – c.480ha employment floorspace

E16 These high-level options have been assessed in the SA, without considering mitigation. In order to identify the best performing option, each spatial option has been ranked in terms of its performance as measured by each of the specific SA Objectives.

E17 The Urban SDO emerges as the best performing option the most often against the SA Framework, ranking 1<sup>st</sup> against SA Objectives 8 (health), 10 (transport) and 12 (economy). The Suburban SDO and Chatham Docks SDO also perform relatively well, each ranking 1<sup>st</sup> against two SA Objectives (Suburban against SA Objectives 1 – climate change mitigation and 6 – natural resources; and Chatham Docks for SA Objectives 4 – landscape and 9 – cultural heritage). The strong performance of these three SDOs highlights the importance of a **'brownfield first' approach in avoiding or reducing potential for adverse effects on various environmental receptors.**

E18 In contrast, the worst performing SDO is the Hoo Peninsula, ranking the lowest against SA Objectives 1 (climate change mitigation), 3 (biodiversity), 5 (pollution and waste), 6 (natural resources) and 8 (health). The Hoo Peninsula SDO encompasses a large and rural area where there are a range of potential adverse effects associated with the introduction of a large quantum of growth in an area with small-scale settlements and in proximity to sensitive ecological receptors.

### *Spatial growth options*

E19 The spatial strategy will direct where new growth is to be allocated in Medway for the Plan period to 2041. Three spatial growth options (which constitute reasonable alternative spatial strategies) have been identified by the Council, based on different combinations of the major sites and broad locations which make up the SDOs:

- Option 1 – Urban regeneration focus;
- Option 2 – Dispersed growth; and
- Option 3 – Blended strategy.

E20 Option 1 focuses on urban regeneration and would avoid the most sensitive rural areas, promoting sustainable travel and reducing reliance on cars, and as such was identified as the best performing option against SA Objectives 1 (climate change mitigation), 4 (landscape and townscape), 6 (natural resources) and 10 (transport and accessibility). However, the 25% uplift in density that would be required to deliver the identified housing and employment needs under such a spatial strategy would be likely to lead to capacity issues and strain on existing infrastructure such as healthcare (SA Objective 8), schools

(SA Objective 11) and public transport (SA Objective 10), as well as potential challenges in terms of conserving historic character alongside regeneration schemes (SA Objective 9).

- E21 Option 2 was not identified as the best performing against any of the SA Objectives, although there are notable health and wellbeing benefits to the more dispersed development pattern in terms of access to public greenspaces and other recreational open spaces associated with lower density schemes (SA Objective 8), as well as the potential to support rural diversification and maintain economic viability of smaller settlements (SA Objective 12). This option could also help to alleviate pressure on existing infrastructure and relieve urban capacity issues. On the other hand, the extensive loss of undeveloped and Green Belt land under Option 2 would be likely to lead to significant adverse effects in terms of climate change mitigation, biodiversity, landscape character and natural resources (SA Objectives 1, 3, 4, 5 and 6).
- E22 Overall, Option 3 is likely to offer the best balance of sustainability considerations by integrating urban regeneration with suburban and rural development, promoting sustainable travel, and addressing the needs of diverse communities. Although, some adverse impacts are likely, including potential for localised adverse effects on the landscape through loss of undeveloped land (SA Objectives 4 and 6), and generation of pollution and waste (SA Objective 5). Careful coordination and planning would be needed to ensure that investments and infrastructure can be directed to address the diverse needs of the community. On the whole, this option is likely 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.

#### *Draft policies*

- E23 A total of 89 draft policies have been prepared by the Council and presented in the Medway Local Plan Regulation 18 2024 Consultation document, in addition to two statements setting out the Vision of the Local Plan and the preliminary Spatial Development Strategy.
- E24 The draft policies will help to ensure that potential adverse effects, as identified in the SA process, are avoided or mitigated in line with the mitigation hierarchy. The policies aim to guide new development in the Medway area, ensuring contributions towards achieving **the Council's aspirations for sustainable growth.**
- E25 For the majority of draft policies, the assessment has identified negligible, minor positive or major positive effects. Negligible impacts are identified where the policy does not directly influence the achievement of that SA Objective, which is the case for many of the **more 'thematic' policies.**
- E26 A greater range of potential sustainability effects are identified for policies that have potential to introduce new development such as the housing and economic development policies, and waste infrastructure policies, as well as the over-arching development strategy policy which sets out the broad direction of growth over the Plan period. 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.

- E27 Opportunities for enhancement may also be secured through policies in the MLP. Where there are opportunities to improve the sustainability performance of draft policies, or general recommendations for the Council to consider in the Plan making process, these have been identified in the SA (see recommendations in Chapter 9).

#### *Development sites*

- E28 The Council has identified a total of 359 reasonable alternative sites for assessment in the SA process, gathered through Call for Sites exercises and the Interim Land Availability Assessment (LAA), including sites which were promoted in response to the previous Regulation 18 consultation (2023).
- E29 Of these 359 sites, the Council has identified 24 strategic sites which can accommodate larger quantities of growth and supporting infrastructure. 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 smaller villages). Strategic employment-led sites are considered to be those which comprise over 75ha.
- E30 The pre-mitigation SA 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 would need to be overcome for development to optimise sustainability performance.
- E31 The SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA framework, based on the methodology and baseline information as discussed within Chapter 2 and Appendix C of this report.
- E32 The assessment of the 24 strategic reasonable alternative sites, including rationale for the recorded impacts, is presented in full in Appendix D.
- E33 The assessment of the 335 non-strategic reasonable alternative sites, including rationale for the recorded impacts, is presented in full in Appendix E.
- E34 Positive impacts were identified in relation to the provision of new housing and employment floorspace, contributing to the identified needs, as well as benefits to health and accessibility as many sites are located within sustainable distance to public greenspaces, the Public Right of Way (PRoW) and cycle networks. Additionally, positive impacts were identified in terms of access to social infrastructure, due to the location of many reasonable alternative sites in areas of good sustainable access to local shops, schools, and employment opportunities. Positive impacts also include the location of many reasonable alternative sites within Flood Zone 1 where fluvial flood risk is low.
- E35 Identified negative impacts included the potential for losses of ecologically and agriculturally important soil resources at large previously undeveloped sites, pressures on biodiversity designations, possible alteration of the character or setting of cultural heritage assets and increased urbanisation of the countryside. Potential negative impacts were identified where development sites could cause alteration to the setting of the Kent Downs

Area of Outstanding Natural Beauty (AONB) / National Landscape located to the south of Medway. Negative impacts on health were also identified in relation to more rural sites with poor access to healthcare facilities, and sites located in close proximity to sources or air pollution including Air Quality Management Areas (AQMAs) and main roads. Some reasonable alternative sites were located in areas of high surface water flood risk, or in areas where there is greater potential for deterioration of the quality of groundwater and watercourses. It should also be noted that even where new development is allocated within sustainable distances to services including healthcare, there may be adverse effects associated with increased pressure on these services.

- E36 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.
- E37 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. All assessments remain at a high level and rely on available secondary data provided by the Council.

#### *Mitigation*

- E38 The SA of reasonable alternative sites against baseline sustainability information has identified a number of adverse effects associated with the SA Objectives as discussed above.
- E39 One way to reduce these adverse impacts identified against baseline receptors is to consider the potential mitigating effects of planning policies.
- E40 The post-mitigation assessment of reasonable alternative sites as presented in Chapter 8 considers how the draft Local Plan policies (as assessed within Appendix F) would help to avoid or reduce the impacts that were identified at the pre-mitigation stage.
- E41 **The assessment findings can then be used to inform the Council's site selection and rejection process, with a clearer understanding about the level of intervention that is likely to be required to reduce adverse effects at different sites. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.**
- E42 At the current stage of plan making, the MLP Regulation 18 Consultation document does not yet include site allocation policies which will be a further means of securing mitigation and sustainable development; such policies will be evaluated in the Regulation 19 SA.

### Next steps

- E43 This Regulation 18 SA Report is subject to consultation with statutory consultees, stakeholders and the general public alongside the Medway Local Plan Regulation 18 2024 Consultation document and other evidence base documents.
- E44 This report represents the latest stage of the SA process. The SA process will take on board any comments on this report and use them to inform the preparation of the next report.
- E45 Once Medway Council have reviewed Regulation 18 consultation comments and have begun preparing the next version of the MLP (Regulation 19 stage), preparation of an Environmental Report will begin, also known as a full SA report. The Environmental Report will include all of the legal requirements set out in Schedule 2 of the SEA Regulations.

# 1 Introduction

## 1.1 Background

**1.1.1** Medway Council are in the process of preparing the Medway Local Plan (MLP). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the decision-making process for Medway Council by identifying the likely sustainability effects of reasonable alternatives and options.

**1.1.2** The MLP is at the Regulation 18 stage of plan making and the Council is undertaking a second Regulation 18 consultation in 2024, which follows on from the high-level Regulation 18 **'Setting the direction for Medway 2040' consultation** (September 2023)<sup>1</sup>. The purpose of this Regulation 18 Interim SA report is to assess the sustainable development implications of the draft proposals and policies presented in the Medway Local Plan Regulation 18 2024 Consultation document.

**1.1.3** A wide range of reasonable alternatives have been identified by Medway Council during the Plan making process. This includes growth options (housing and employment number), spatial delivery options (broad locations for new development), spatial growth options (alternatives to the spatial strategy), strategic and non-strategic development sites. A suite of draft policies has also been prepared to guide and inform new development. The SA outputs are intended to help Medway Council to identify sustainable development options and prepare a local plan which is economically, environmentally, and socially sustainable.

**1.1.4** A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies; its role 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.

**1.1.5** This SA/SEA document follows on from the SA Scoping Report<sup>2</sup> which was consulted on with the statutory bodies (Natural England, Historic England and the Environment Agency) between 19<sup>th</sup> September and 31<sup>st</sup> October 2023.

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<sup>1</sup> Medway Council (2023) Setting the direction for Medway 2040. Available at: [https://www.medway.gov.uk/info/200542/medway\\_local\\_plan\\_2040/1823/setting\\_the\\_direction\\_for\\_medway\\_2040](https://www.medway.gov.uk/info/200542/medway_local_plan_2040/1823/setting_the_direction_for_medway_2040) [Date accessed: 04/04/24]

<sup>2</sup> 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](https://www.medway.gov.uk/downloads/file/8412/sustainability_appraisal_of_the_medway_local_plan_-_scoping_report_2023) [Date accessed: 25/01/24]



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## 1.2 The Medway area

- 1.2.1** Medway is a unitary authority in Kent in the south east of England, covering approximately 26,906ha, with a population of 279,827 according to the Census (2021)<sup>3</sup>. 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.
- 1.2.2** 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.
- 1.2.3** Figure 1.1 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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<sup>3</sup>ONS (2021) Estimates of the population for the UK. Available at:  
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland> [Date accessed: 25/01/24]



Figure 1.1: Medway Council administrative boundary

## 1.3 The Medway Local Plan 2041

1.3.1 The Medway Local Plan (MLP) will include the overall strategy for development in Medway Council for the Plan period 2025 to 2041, providing a framework for where and how new development can take place.

1.3.2 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.

1.3.3 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.

1.3.4 An initial Regulation 18 Consultation document '**setting the direction for Medway**' was prepared by Medway Council and published for consultation between 18<sup>th</sup> September and 31<sup>st</sup> October 2023<sup>4</sup>. 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.

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

1.3.6 Comments received during the 2023 Regulation 18 consultation will help to inform the plan-making process and the following SA stages.

1.3.7 The current stage of plan making, accompanied by this Interim SA Report, represents a **further 'Regulation 18' consultation. The consultation will** present three spatial growth options and provide details on proposed policies and potential development sites. It is considered a critical stage in the production of the new Local Plan.

1.3.8 Once adopted, the MLP will form part of the statutory development plan for Medway, covering the period 2025 to 2041, replacing and updating the current Medway Local Plan, which was adopted in 2003<sup>5</sup>.

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<sup>4</sup> Medway Council (2023) *Setting the direction for Medway 2040*. Available at: [https://www.medway.gov.uk/info/200542/medway\\_local\\_plan\\_2040/1823/setting\\_the\\_direction\\_for\\_medway\\_2040](https://www.medway.gov.uk/info/200542/medway_local_plan_2040/1823/setting_the_direction_for_medway_2040) [Date accessed: 29/01/24]

<sup>5</sup> Medway Council (2003) *Medway Local Plan*. Available at: [https://www.medway.gov.uk/info/200149/planning\\_policy/146/current\\_planning\\_policies/3](https://www.medway.gov.uk/info/200149/planning_policy/146/current_planning_policies/3) [Date accessed: 24/01/24]

## 1.4 Integrated approach to SA and SEA

- 1.4.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.4.2 The European Union Directive 2001/42/EC<sup>6</sup> (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *"the objective of this Directive 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"*.
- 1.4.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004<sup>7</sup> (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the MLP to be subject to SEA throughout its preparation.
- 1.4.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004<sup>8</sup> 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<sup>9</sup>. SA 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.
- 1.4.5 Public consultation is an important aspect of the integrated SA/SEA process.

## 1.5 Best Practice Guidance

- 1.5.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal 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:

<sup>6</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 25/01/24]

<sup>7</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 25/01/24]

<sup>8</sup> Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 25/01/24]

<sup>9</sup> The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/ukxi/2012/767/contents/made> [Date accessed: 25/01/24]

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment<sup>10</sup>;
- Office of the Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>11</sup>;
- Department for Levelling Up, Housing and Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)<sup>12</sup>;
- DLUHC and Ministry of Housing, Communities and Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)<sup>13</sup>; and
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>14</sup>.

## 1.6 Sustainability Appraisal

**1.6.1** This document is a component of the SA of the MLP. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of Figure 1.2, according to PPG on SA<sup>15</sup>.

<sup>10</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment. Available at:

[http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date accessed: 24/01/24]

<sup>11</sup> Office of the 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/practicalguides\\_ea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf) [Date accessed: 24/01/24]

<sup>12</sup> DLUHC (2023) National Planning Policy Framework, December 2023. Available at:

[https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf) [Date accessed: 24/01/24]

<sup>13</sup> DLUHC & MHCLG (2023) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 24/01/24]

<sup>14</sup> Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 24/01/24]

<sup>15</sup> DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at:

<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 24/01/24]



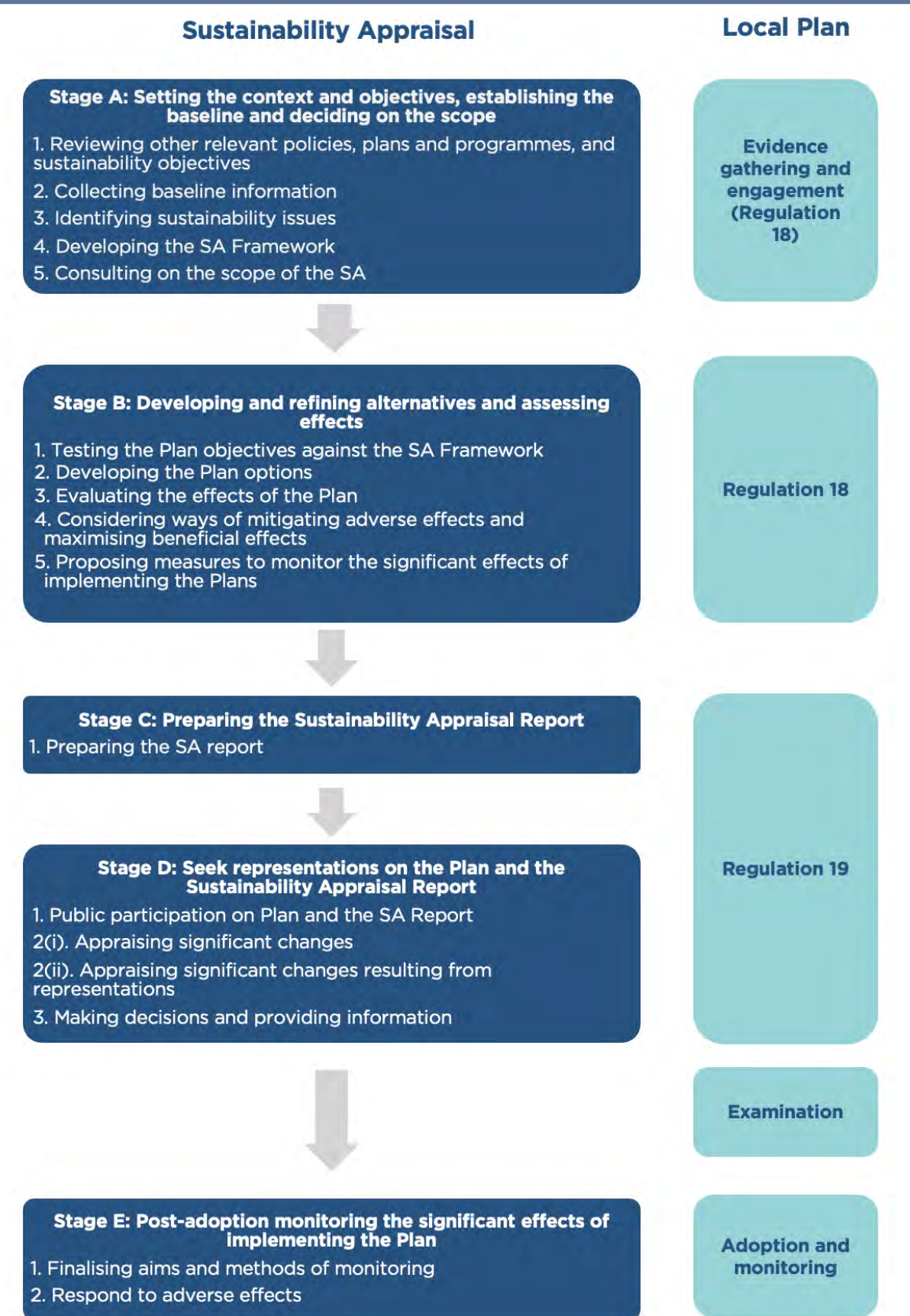


Figure 1.2: Sustainability appraisal process

## 1.7 The SA process so far

1.7.1 Table 1.1 below presents a timeline of stages of the MLP and SA process so far. To date, this represents Stages A and B of Figure 1.2.

Table 1.1: The MLP and SA process to date

Date	MLP stage	SA output
September – October 2023	Regulation 18 Consultation: Setting the direction for Medway The high level consultation document provided an opportunity for the public and stakeholders to voice their views on the topics and issues the MLP should cover, to help define priorities for the environment, communities and the economy and shape policies for the emerging Local Plan.	SA Scoping Report <b>The SA Scoping Report identified the scope and level of detail to be included in the SA</b>
July – September 2024	Medway Local Plan Regulation 18 2024 Consultation The consultation document presents three spatial growth options considered in the preparation of the Medway Local Plan, and sets out for <b>the Council's</b> indicative preferred approach for growth in Medway over the Plan period, including draft policies and potential development sites.	Regulation 18 Interim SA Report (this report) <b>This report assesses</b> the reasonable alternative options for housing and employment growth, spatial strategy, development sites and policies identified by the Council during the preparation of the Regulation 18 consultation document.

## 1.8 Scoping Report

1.8.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report<sup>16</sup> was produced in September 2023.

1.8.2 The SA Scoping Report represented Stage A of the SA process (see Figure 1.2), and contains information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

1.8.3 The Scoping Report was consulted on between 19<sup>th</sup> September and 31<sup>st</sup> October with the statutory bodies Natural England, Historic England and the Environment Agency. The SA Scoping Report was also published on the Council's website alongside the Regulation 18 'Setting the direction for Medway' document for context, although further comments were not invited.

<sup>16</sup> Lepus Consulting (2023) Sustainability Appraisal of the Medway Local Plan: Scoping Report. Available at: <http://tinyurl.com/5a5e2wbx> [Date accessed: 24/01/24]

**1.8.4** Comments received from the statutory consultees regarding the SA Scoping Report have informed the preparation of this Regulation 18 SA Report. Table 1.2 summarises the responses received and how these comments have been incorporated into the SA process.

Table 1.2: Consultation responses from statutory consultees on the SA Scoping Report (September 2023)

Consultee	Summary of consultation response	Incorporation into the SA
Natural England	<p>"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.</p> <p>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.</p> <p>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 <b>relating to the achievement of the 'Accessible Greenspace Standard'</b>, for example.</p> <p>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.</p> <p>For Objective 5 (Pollution and Water), Natural England would support the inclusion of ecological receptors within the indicators.</p> <p>For Objective 6 (Natural Resources), Natural England recommends <b>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.</b></p> <p>For Objective 8 (Health and Wellbeing), Natural England recommends that the indicators are updated to reflect the <b>Accessible Greenspace Standards within the Green Infrastructure Standards."</b></p>	The SA Framework has been updated to consider the recommendations made by Natural England, including making stronger reference to nature-based solutions, nature recovery, the AONB (now known as National Landscape) and other ecological receptors (see Appendix A).
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	<p>"...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.</p> <p>...<b>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:</b></p> <ul style="list-style-type: none"> <li>• <b>Groundwater is protected and improved for the benefit of people and the economy.</b></li> <li>• <b>Future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised.</b></li> </ul>	<p>The SA Framework has been updated to include stronger reference to water and groundwater quality (see Appendix A).</p> <p>The implications of development in proximity to existing coastal defences has been considered in the Regulation 18 SA assessments (see site assessment methodology in</p>



Consultee	Summary of consultation response	Incorporation into the SA
	<p>• <b>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.</b></p> <p>• <b>Therefore, we request that table 12.1 be more specific in mentioning Groundwater in relation to water quality.</b></p> <p><i>...In paragraph 10.2.10 a standard of 125 litres per person per day is referenced however a higher standard of 110l/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</i></p> <p><i>...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.</i></p> <p><i>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:</i></p> <p>• <b>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 (<a href="http://www.gov.uk">www.gov.uk</a>)</b></p> <p>• <b>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.</b></p> <p>• <b>The percentage reliability of new consumptive abstraction in the Medway ALS is available less than 30% of the time.</b></p> <p><i>...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.</i></p> <p><i>...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.</i></p> <p><i>...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, 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."</i></p>	<p>Appendix C and reasonable alternative site assessments in Appendix D).</p> <p>The recommendations have been considered in the evaluation of the draft MLP policies (see Appendix F).</p> <p>Other relevant documents identified by the Environment Agency have been considered whilst preparing this Regulation 18 SA. The PPP Review will be updated compared to the version presented in the SA Scoping Report to include these additional documents, and other new/updated evidence available, at the Regulation 19 stage.</p>

## 1.9 Signposting for this report

1.9.1 This Regulation 18 Interim SA Report sets out an assessment of draft policies and reasonable **alternatives, or 'options'**, identified by Medway Council during the process of preparing the Regulation 18 2024 MLP consultation document. These relate to options for growth and the spatial strategy, policies and development sites.

1.9.2 The appendices of this report provide essential contextual information to the main body of the report. The contents of Volume 1 of the SA Report (this document) are listed below:

- Chapter 1 (this chapter) sets out the purpose, context and introduction to the MLP and the accompanying SA process.
- Chapter 2 sets out the methodology used to present and assess the findings of the SA process.
- Chapter 3 presents the assessment of growth options i.e. the quantum of development to be delivered through the Plan.
- Chapter 4 **summarises the assessment of 'spatial delivery options' (SDOs)**, which constitute components that could form a spatial strategy.
- Chapter 5 **presents the assessment of 'spatial growth options' which are** reasonable alternative spatial strategies.
- Chapter 6 summarises the assessment of reasonable alternative sites pre-mitigation.
- Chapter 7 summarises the assessment of draft Local Plan policies.
- Chapter 8 considers the likely mitigating influence of the draft policies on the pre-mitigation site assessments, as presented in Chapter 6.
- Chapter 9 sets out a range of recommendations to enhance the Plan.
- Chapter 10 provides an overview of the consultation arrangements and next steps.

1.9.3 Volume 2 of the SA comprises the appendices, including the full assessment information, as follows:

- Appendix A presents the SA Framework.
- Appendix B presents the full assessment of SDOs (as summarised in Chapter 3).
- Appendix C presents the detailed site assessment methodology, building on the information set out in Chapter 2.
- Appendix D presents the full pre-mitigation assessment of the reasonable alternative non-strategic sites (as summarised in Chapter 6).
- Appendix E presents the full assessment of the pre-mitigation reasonable alternative strategic sites (as summarised in Chapter 6).
- Appendix F presents the assessment of the Draft MLP policies.

## 2 Assessment methodology and scope of appraisal

### 2.1 Assessment of reasonable alternatives

2.1.1 Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in Appendix A, is comprised of 12 SA Objectives. Table 2.1 summarises the SA Objectives and their relevance to the SEA themes.

Table 2.1: Summary of SA Objectives

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	Climate Change Mitigation: <b>Minimise Medway’s contribution to climate change.</b>	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

- 2.1.2 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<sup>17</sup>. Including the SEA topics in the SA Objectives helps to ensure that all of the environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.
- 2.1.3 It is important to note that 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.
- 2.1.4 The purpose of this document is to provide an appraisal of reasonable alternatives, also known as 'options', in line with Regulation 12 of the SEA Regulations<sup>18</sup>:
- 2.1.5 *"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".*
- 2.1.6 At this stage of the plan making process, Medway Council have identified spatial strategy options and reasonable alternative sites. Medway Council have also prepared a suite of draft policies for inclusion in the MLP. All reasonable alternatives, options and policies identified by the Council have been assessed against the SA Framework.
- 2.1.7 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see Box 2.1).

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<sup>17</sup> 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)."

<sup>18</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 25/01/24]

*Box 2.1: Schedule 1 of the SEA Regulations<sup>19</sup>*

## 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 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.

## 2.2 Impact assessment and determination of significance

**2.2.1** Significance of effect is a combination of impact sensitivity and magnitude. Impact 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.

## 2.3 Sensitivity

**2.3.1** 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.

**2.3.2** A guide to the range of scales used in determining impact sensitivity is presented in Table 2.2. For most receptors, sensitivity increases with geographic scale.

<sup>19</sup> 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: 25/01/24]

Table 2.2: 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.

## 2.4 Magnitude

**2.4.1** 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 2.3).

Table 2.3: Impact magnitude

Impact magnitude	Typical criteria
High	<ul style="list-style-type: none"> <li>• Likely total loss of or major alteration to the receptor in question;</li> <li>• Provision of a new receptor/feature; or</li> <li>• The impact is permanent and frequent.</li> </ul>
Medium	<p>Partial loss/alteration/improvement to one or more key features; or</p> <p>The impact is one of the following:</p> <ul style="list-style-type: none"> <li>• Frequent and short-term;</li> <li>• Frequent and reversible;</li> <li>• Long-term (and frequent) and reversible;</li> <li>• Long-term and occasional; or</li> <li>• Permanent and occasional.</li> </ul>
Low	<p>Minor loss/alteration/improvement to one or more key features of the receptor; or</p> <p>The impact is one of the following:</p> <ul style="list-style-type: none"> <li>• Reversible and short-term;</li> <li>• Reversible and occasional; or</li> <li>• Short-term and occasional.</li> </ul>

## 2.5 Significant effects

**2.5.1** A single value from Table 2.4 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.

**2.5.2** 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:** *"short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects"*.

Table 2.4: 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: <ul style="list-style-type: none"> <li>Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance;</li> <li>Cause a very high-quality receptor to be permanently diminished;</li> <li>Be unable to be entirely mitigated;</li> <li>Be discordant with the existing setting; and/or</li> <li>Contribute to a cumulative significant effect.</li> </ul>
Minor Negative -	<ul style="list-style-type: none"> <li>The size, nature and location of development proposals would be likely to:</li> <li>Not quite fit into the existing location or with existing receptor qualities; and/or</li> <li>Affect undesignated yet recognised local receptors.</li> </ul>
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> <li>Improve undesignated yet recognised receptor qualities at the local scale;</li> <li>Fit into, or with, the existing location and existing receptor qualities; and/or</li> <li>Enable the restoration of valued characteristic features.</li> </ul>
Major Positive ++	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> <li>Enhance and redefine the location in a positive manner, contributing at a national or international scale;</li> <li>Restore valued receptors which were degraded through previous uses; and/or</li> <li>Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.</li> </ul>

- 2.5.3** When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of an option in terms of the relevant SA Objective, the precautionary principle<sup>20</sup> has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in Appendix A) 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 are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option or proposal being considered.
- 2.5.4** For the assessment of reasonable alternative sites, to enable further transparency and to provide the reader with contextual information that is relevant to each SA Objective, the full assessments presented in the SA report appendices have been set out per 'receptor'. The methodology used to assess reasonable alternative sites throughout the SA process, which sets out the receptors considered for each SA Objective and includes topic-specific methodologies and assumptions, is presented in Appendix C.
- 2.5.5** 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).
- 2.5.6** The level of effect has been categorised as minor or major. 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.
- 2.5.7** Each reasonable alternative or option that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per Table 2.4. Likely impacts are not intended to be summed.
- 2.5.8** It is important to note that the assessment scores presented in Table 2.4 are high level indicators. The assessment narrative text should always read alongside the significance scores, and should bear in mind the limitations of assessments of a strategic nature.

## **2.6** Limitations of predicting effects

- 2.6.1** 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.

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<sup>20</sup>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, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered"*.



- 2.6.2** The assessments in this report are based on the best available information, including secondary data that has been provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- 2.6.3** SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and 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.
- 2.6.4** The assessment of development proposals is limited in terms of available data resources; for example, 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. Furthermore, the evidence to inform assessments of reasonable alternative sites against SA Objective 2 (Landscape) is limited in that there is limited landscape capacity or sensitivity information available for land parcels within the urban area (i.e. outside of the Green Belt), however Landscape Character Areas cover all of Medway, including undeveloped land close to the urban area such as Horsted and the Capstone Valley.
- 2.7** Methodology for assessment of spatial options and policies
- 2.7.1** The appraisal of growth options, spatial delivery options, spatial growth options and policies aims to assess the likely significant effects of each proposed option or policy, based on the criteria set out in the SEA Regulations (see Box 2.1).
- 2.7.2** Table 2.5 sets out a guide to how likely impacts have been determined in the assessment of options within this report.

*Table 2.5: Presenting likely impacts*

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

**2.7.3** The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distil the wide-ranging effects of a broad growth option into one overall impact. A ranking exercise has also been carried out for the options, where possible, in order to consider their relative performance against each SA Objective and provide an indication as to the best performing options.

## 2.8 Reasonable alternatives

**2.8.1** Medway Council has identified a suite of reasonable alternatives in sequence, helping to demonstrate the decision-making process and how the Medway Local Plan Regulation 18 2024 Consultation document has been developed. Each type of reasonable alternative has been evaluated alongside the preparation of the Local Plan.

**2.8.2** Figure 2.1 summarises the types of reasonable alternative which have been assessed in the following chapters of this SA report, and the relationship between different types of alternatives.

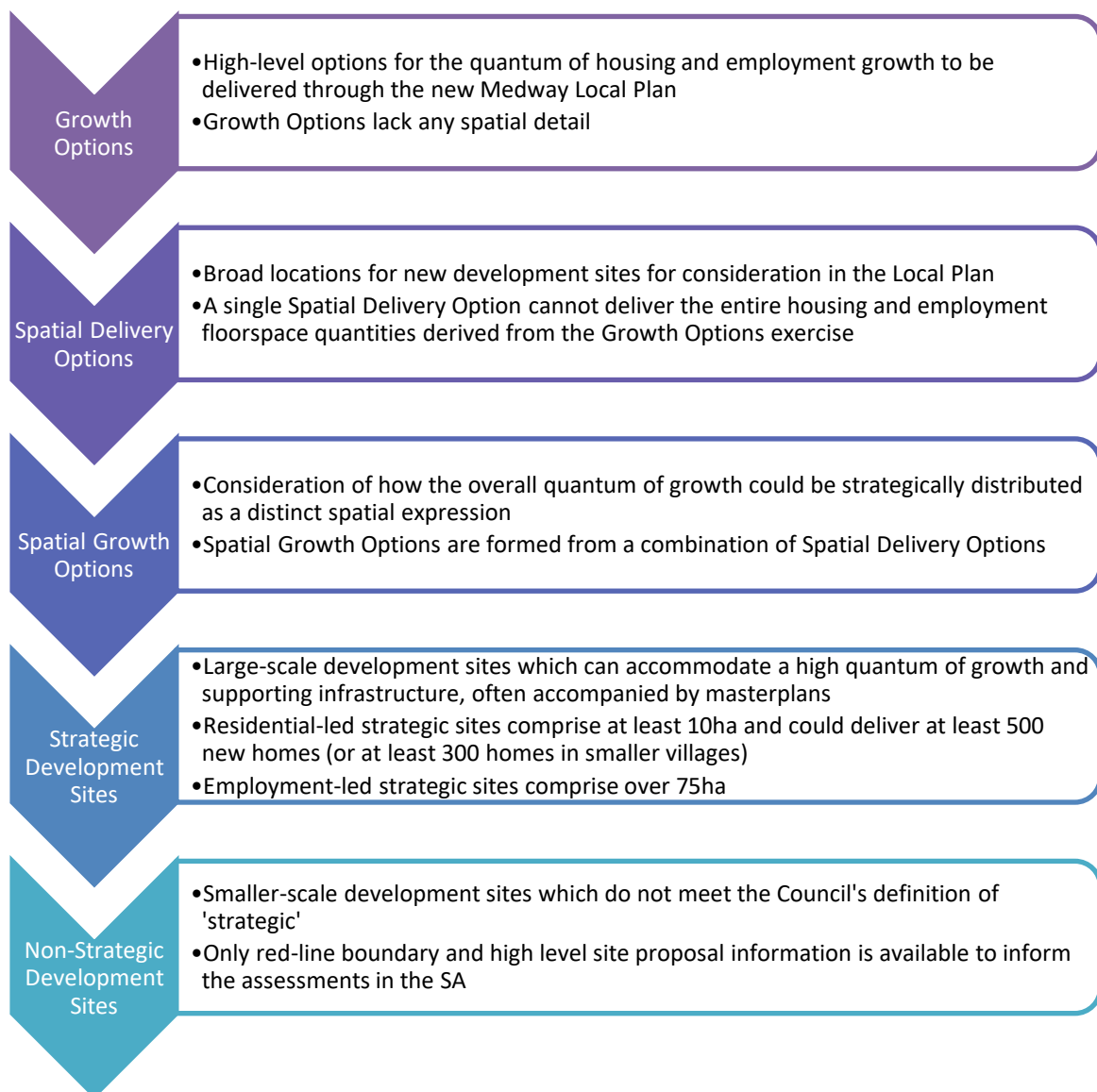


Figure 2.1: Types of reasonable alternatives identified, described and evaluated in the Medway Local Plan SA

## 3 Assessment of growth options

### 3.1 Preface

**3.1.1** Paragraph 61 of the NPPF<sup>21</sup> 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<sup>22</sup>, unless the local authority feel that circumstances warrant an alternative approach. **The NPPF also states that “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”.**

**3.1.2** According to information provided by the Council, and based on **the government’s standard** method calculation, the Local Housing Need (LHN) for Medway over the Plan period to 2041 is 26,528 homes. When considering a 5% buffer to allow for market flexibility, this results in an approximate need of 27,854 homes. Considering the existing supply commitments and anticipated windfall supply, this leaves a required yield of 22,491 homes to be delivered through the emerging Medway Local Plan. In terms of economic needs, **the Council’s** initial objective assessment of employment land identified a need of 274,663m<sup>2</sup>.

**3.1.3** Following careful consideration of the available evidence at this 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 have identified two reasonable alternatives for the quantum of housing and employment growth to be delivered through the emerging Local Plan (see Table 3.1). These options are based on the latest available evidenced needs for the Plan area, and the unmet needs of the neighbouring authority of Gravesham, although it should be noted that **Gravesham’s Local Plan** Partial Review<sup>23</sup> is currently in preparation and the unmet housing need has not yet been confirmed.

**3.1.4** The two reasonable alternatives presented in Table 3.1 have been assessed using the SA Framework, as set out in the narrative for each SA Objective within section 3.2 below, with the relative sustainability performance of two options summarised in section 3.3 and Table 3.2.

**3.1.5** 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. The growth options relate to quanta only and do not include any spatial information.

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<sup>21</sup> DLUHC (2023) National Planning Policy Framework, December 2023. Available at: [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf) [Date accessed: 04/04/24]

<sup>22</sup> DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 04/04/24]

<sup>23</sup> 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: 15/05/24]

Table 3.1: Growth options identified by Medway Council

Growth option	Description of growth option
Option 1	<b>Meet Medway's</b> Local Housing Need and Initial Objective Assessment of Employment Land Need. Approximately 22,643 homes and 274,663m <sup>2</sup> employment land.
Option 2	As for Option 1, plus meeting <b>Gravesham's Unmet</b> 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 <sup>2</sup> employment land.

Lower Thames Crossing and implications for growth in Medway

- 3.1.6 Medway Council's written representations in the Lower Thames Crossing (LTC) Examination stated that the applicant's core traffic modelling scenario did not reflect Medway's LHN.** This matter was not agreed in the final Statement of Common Ground.
- 3.1.7** Growth within the transport model is capped in line with DfT traffic forecasts (TEMPro 7.2) and adjusted locally to account for developments close to the project that are under construction, have a planning application and planning permission (as of 30 September 2021). This comprised the core traffic modelling scenario, which forms the basis of assessments to support the application.
- 3.1.8** TEMPro 7.2<sup>24</sup> shows that the number of households formed in Medway from 2025 to 2041 is 13,659, i.e. 13,013 fewer homes compared to the identified housing need. The distinction between households and homes is unclear.
- 3.1.9** An assessment<sup>25</sup> on behalf of Medway Council identified negative operational impacts on M2 junctions 2, 3 and 4, the A289 corridor, the A228 through Cuxton and Halling and in Chatham and Strood town centres, as a result of the LTC.
- 3.1.10** Furthermore, due to predicted minor increases in traffic noise along the A228 where existing noise levels are already significant, there are likely to be significant adverse effects in Cuxton and Halling. Similar adverse effects have been identified at Elaine Avenue, Strood and Watling Street / A2 (Strood Academy).
- 3.1.11** The applicant devised a high growth scenario, but at the time of writing it is unclear to what extent this aligns with identified housing need and objectively assessed need for employment land.
- 3.1.12** **The Examining Authority's recommendation report was submitted to the Secretary of State for Transport on 20 March, with a decision on whether to grant a Development Consent Order expected in October 2024.**

<sup>24</sup> UK Gov (2023) Trip End Model Presentation Program (TEMPro) download. Available at: <https://www.gov.uk/government/publications/tempro-downloads> [Date accessed 15/05/24]

<sup>25</sup> Medway Council (2023) Local Impact Report: Lower Thames Crossing. Available at: [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002478-Medway%20Council%20-%20Local%20Impact%20Report%20\(LIR\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002478-Medway%20Council%20-%20Local%20Impact%20Report%20(LIR).pdf) [Date accessed: 17/05/24]

- 3.1.13** With and without LTC scenarios will be tested in the Strategic Transport Assessment (STA), which may determine the need for a refined, lower growth option, reflecting capacity constraints.
- 3.1.14** Should any further reasonable alternatives be identified during the Plan making process, they will be assessed in the accompanying SA process.

## 3.2 Assessment

### SA Objective 1 – Climate change mitigation

- 3.2.1** Medway's **carbon dioxide (CO<sub>2</sub>)** emissions totalled 761 kilotonnes in 2021, with per capita emissions of approximately 2.7 tonnes<sup>26</sup>. Domestic sources are reported as the largest contributor (343.8 kilotonnes), followed by transport (205.6 kilotonnes). Both growth options have potential to increase CO<sub>2</sub> 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.
- 3.2.2** 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.
- 3.2.3** Overall, given that Option 1 proposes a slightly lower total number of dwellings (22,643) than Option 2 (24,643), Option 1 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.

### SA Objective 2 – Climate change adaptation

- 3.2.4** 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 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.
- 3.2.5** 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 1 and 2 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 1 could potentially lead to lower potential for adverse effects than Option 2 given the slightly lower quantum of growth proposed.

<sup>26</sup> Department for Energy Security and Net Zero (2023) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2021. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2021> [Date accessed: 03/04/24]

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### SA Objective 3 – Biodiversity and geodiversity

- 3.2.6** 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.
- 3.2.7** 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 1 proposes a lower total quantum of growth than Option 2, Option 1 could potentially perform slightly better in this regard.

### SA Objective 4 – Landscape and townscape

- 3.2.8** 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.
- 3.2.9** Both Options 1 and 2 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 2 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 1 could perform marginally better in terms of landscape and townscape. A minor negative impact is recorded for Option 1, and a major negative impact for Option 2.

### SA Objective 5 – Pollution and waste

- 3.2.10** There are four Air Quality Management Areas (AQMAs) within Medway, declared due to exceedances in nitrogen dioxide (NO<sub>2</sub>), 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.

- 3.2.11** 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.
- 3.2.12** The estimated total household waste produced within Medway in 2022/2023 was 118,267 tonnes<sup>27</sup>. New development under both growth options is likely to result in an increase in waste generation, to some extent. This matter will be considered in more detail in the Waste Needs Assessment, which is currently in progress.
- 3.2.13** Overall, given that Option 1 proposes a slightly lower total number of dwellings (22,643) than Option 2 (24,643), Option 1 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.

#### SA Objective 6 – Natural resources

- 3.2.14** 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.
- 3.2.15** 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 22,643–24,643 homes and 274,663m<sup>2</sup> of employment land there will be a need to utilise previously undeveloped land to some 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 3.2.7.
- 3.2.16** Owing to the slightly lower housing number under Option 1, 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 2. A minor negative impact is recorded for Option 1, and a major negative impact for Option 2.

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<sup>27</sup> Department for Environment, Food and Rural Affairs (2024) Local Authority Collected Waste Statistics for 2022/2023. Available at: [www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results](https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results) [Date accessed: 04/04/24]



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### SA Objective 7 – Housing

- 3.2.17** 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 35 of the NPPF to positively prepare the Plan. Option 1 would seek to provide **22,643 homes, addressing Medway's** needs only, and therefore providing a minor positive impact on housing when considered relative to the other options. Whereas, Option 2 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.9% uplift, and therefore providing a major positive impact on housing.
- 3.2.18** At this 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 2 could potentially lead to greater positive effects than Option 1.

### SA Objective 8 – Health and wellbeing

- 3.2.19** **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.
- 3.2.20** 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 2 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 1 could be seen as the best performing option since it proposes a lower quantum of growth.

### SA Objective 9 – Cultural heritage

- 3.2.21** 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 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.



**3.2.22** 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 1 could be seen as the better performing option.

#### SA Objective 10 – Transport and accessibility

**3.2.23** 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.

**3.2.24** 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 1 could be seen as the best performing option since it proposes a lower quantum of growth. The emerging STA will provide further information regarding the transport network and the implications for development in Medway.

#### SA Objective 11 – Education

**3.2.25** 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.

**3.2.26** 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 1 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.

#### SA Objective 12 – Economy and employment

**3.2.27** 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 35 of the NPPF to positively prepare the Plan. Both options propose the same level of employment growth of 274,663m<sup>2</sup> floorspace, and are therefore anticipated to provide the same increase in job opportunities.

**3.2.28** 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 1 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.

### 3.3 Conclusion

**3.3.1** This assessment is limited in the sense that the growth options focus only on quanta, i.e. the number of homes and area of employment floorspace. The assessment of growth options does not consider the exact size and location of growth, beyond the principles of **the NPPF to pursue 'brownfield first'**, which means that any attempt to evaluate impacts in a meaningful way is necessarily very high level.

**3.3.2** 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. Similarly, pursuing a lower quantum of growth could potentially result in less pressure on transport and social infrastructure. In light of this, Option 1 has been identified as the better performing of the two options against the majority of the SA Objectives, as summarised in Table 3.2.

**3.3.3** In contrast, Option 2 has been identified as the better performing against SA Objective 7 (housing) owing to the proposed c.2,000 dwelling contribution towards the estimated unmet needs of Gravesham Borough. This could lead to greater benefits than Option 1 in terms of delivering a suitable housing mix, including affordable homes, to meet the needs of the population.

**3.3.4** However, both growth options propose a similar level of growth and would satisfy the local development needs, with benefits for social and economic SA Objectives such as housing and the economy. **Given Medway's environmental and transport constraints, both options** could lead to similar challenges in terms of accommodating the required level of growth whilst avoiding or minimising potential for adverse effects.

Table 3.2: Impact matrix of growth options

Growth Option	1	2	3	4	5	6	7	8	9	10	11	12
	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
Option 1	--	+/-	-	-	--	-	+	+/-	+/-	-	+/-	+
Option 2	--	+/-	-	--	--	--	++	+/-	+/-	-	+/-	+

	1	2	3	4	5	6	7	8	9	10	11	12
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
Best Performing Option?	1	1	1	1	1	1	2	1	1	1	1	1

### 3.4 Selection and rejection

**3.4.1** Reflecting on the SA findings and the other available evidence for the emerging MLP, the Council consider that:

**3.4.2** *“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. In the meantime, Option 2 cannot be justified.*

**3.4.3** *Option 1 has been shown to perform better compared to Option 2, and therefore Option 1 forms the basis of Medway Council’s proposed spatial strategy in the Regulation 18 consultation in July 2024”.*

## 4 Assessment of spatial delivery options

### 4.1 Preface

**4.1.1** Drawing on information gathered through Call for Sites exercises and the Interim Land Availability Assessment (LAA)<sup>28</sup> and sites promoted in response to the previous Regulation 18 consultation (2023), **12 'spatial delivery options' (SDOs) have been identified by the Council.**

**4.1.2** The SDOs are 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. The SDOs are potential components of a spatial strategy; no single SDO can **meet Medway's development needs identified in Table 3.1.**

**4.1.3** The 12 SDOs and the likely range of homes that could theoretically be delivered through each SDO are presented in Table 4.1 and their broad location across Medway indicated on Figure 4.1. The number of dwellings that could be delivered through each SDO will be subject to change as the Local Plan develops.

**4.1.4** Each SDO has been assessed using the SA Framework, at a high level and without consideration of any detailed mitigation. The full assessment of each SDO against the SA Framework is set out in Appendix B and summarised within this chapter.

*Table 4.1: 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

<sup>28</sup> 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](https://www.medway.gov.uk/downloads/file/8413/medway_land_availability_assessment_september_2023) [Date accessed: 05/04/24]

- 4.1.5** The summary findings for each SA Objective, drawing on the full assessments as presented in Appendix B, are set out within section 4.2 below, wherein the relative sustainability performance of the 12 SDOs against each objective is evaluated using the high-level SA scoring system as presented in Chapter 2.
- 4.1.6** In order to identify the best performing option, each spatial option has been ranked in terms of its performance as measured by each of the specific SA Objectives. The relative **'score' and 'rank' against each SA Objective are presented in** Tables 4.2 to 4.13 and an overall evaluation summarised in section 4.3.
- 4.1.7** 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. The SDOs vary in geographic scale (as shown on Figure 4.1) and associated potential capacity (as shown in Table 4.1); this means that the evaluation is limited in its conclusions however the below evaluation has drawn on the relative strengths and weaknesses identified for each option in effort to allow Medway Council to consider which option should be pursued in the emerging Plan.

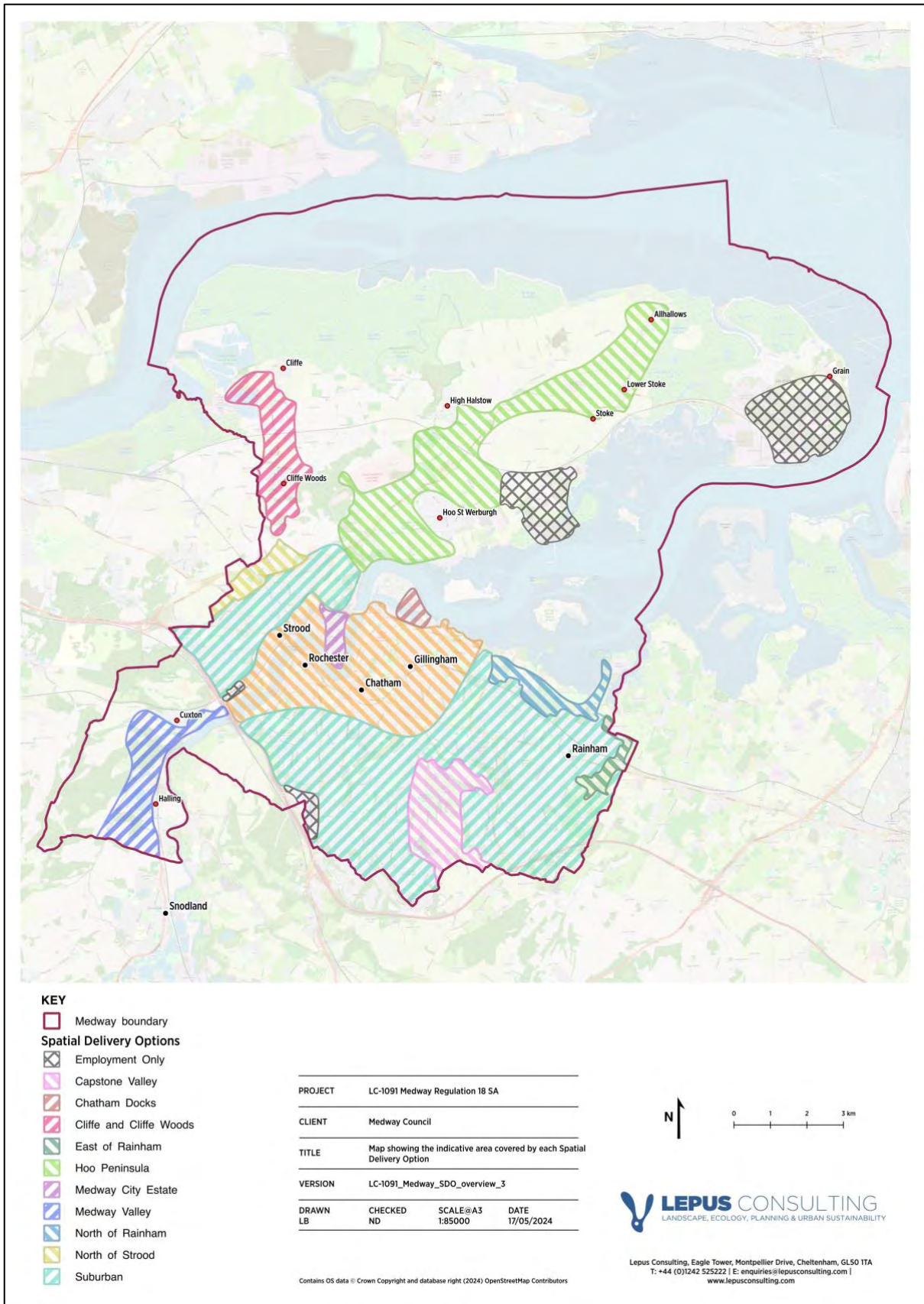


Figure 4.1: Map showing the indicative broad areas covered by each Spatial Delivery Option



## 4.2 Overview of assessment

### SA Objective 1 – Climate change mitigation

- 4.2.1** All SDOs have potential to result in adverse impacts of climate change mitigation to some extent, owing to the construction and occupation of a large quantum of new development. The residential-led SDOs were ranked based on their capacity, which is considered to be generally indicative of increases in GHG emissions. There is greater uncertainty regarding the likely impacts associated with the Employment SDO as the nature and scale of the non-residential uses are unknown at this stage.
- 4.2.2** The largest quantum of growth is proposed development within the Hoo Peninsula SDO where approximately 10,893 homes could be delivered, and in the Urban SDO, a potential housing capacity of **7,719**. **These SDOs are likely to significantly contribute to Medway's** GHG emissions due to the construction and occupation of high development yields.
- 4.2.3** The Suburban SDO has the smallest proposed development yield of 495. Although it is still likely to contribute to an increase in GHG emissions to some extent, this is significantly less than the proposed developments of higher yields.
- 4.2.4** The exact type of employment use is currently unknown. As a consequence, the impact on emissions is uncertain.

*Table 4.2: Impact matrix and ranking of SDOs for SA1 – climate change mitigation*

SA Objective 1 (Climate change mitigation)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	--	--	-	-	+/-	--	-	-	--	-	-	--
Rank	9th	8th	6th	4th	N/A	11th	3rd	2nd	7th	5th	1st	10th

### SA Objective 2 – Climate change adaptation

- 4.2.5** All SDOs contain some areas of fluvial and surface water flood risk. It is acknowledged that these impacts are likely to be avoided or mitigated through application of the sequential test at the site-level, locating development away from areas of flood risk within the SDO boundaries, and through the inclusion of sustainable drainage systems (SUDS) and enhanced green infrastructure (GI) within large developments in line with the NPPF. Such details are not known for the SDOs.
- 4.2.6** The SDOs were ranked according to the percentage of Flood Zone 2 and 3 within their indicative boundaries, alongside the percentage of SWFR within the SDO. Whether the SDO lies within 20m of flood defences was also considered as a factor, as such developments are likely to compromise the maintenance and effectiveness of flood defences in the future.



- 4.2.7** Cliffe and Cliffe Woods SDO contains less than 1% of Flood Zone 2 and 3, as well as less than 5% SWFR, therefore it has been ranked as the best performing option for climate change adaptation. Additionally, five other SDOs coincided with less than 10% of Flood Zone 2 and 3, as well as with SWFR, and therefore were identified as resulting in overall negligible impacts against climate change adaptation as it is more likely that these smaller proportions of flood risk could be avoided or mitigated.
- 4.2.8** Minor negative impacts were identified for Medway Valley and North of Rainham SDOs owing to the presence of flood defences and higher SWFR respectively, although to a lesser extent than other SDOs.
- 4.2.9** The Employment SDO ranked as the worst performing, closely followed by Chatham Docks SDO, Medway City Estates and Urban SDOs. The Employment and Chatham Docks SDOs contain over 55% of Flood Zone 2 and 3, and over 10% SWFR. All four SDOs also coincide with existing flood defences.

*Table 4.3: Impact matrix and ranking of SDOs for SA2 – climate change adaptation*

SA Objective 2 (Climate change adaptation)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	0	--	0	0	--	0	--	-	-	0	0	--
Rank	5th	11th	1st	3rd	12th	2nd	9th	7th	8th	4th	6th	10th

### SA Objective 3 – Biodiversity and geodiversity

- 4.2.10** The proposed development at all SDOs is expected to result in potential for adverse impacts on biodiversity, due to the large scale of development posing risks to designated and undesignated biodiversity assets. Some impacts have potential to be mitigated through retention/incorporation of GI within developments, providing opportunities to improve habitat connectivity and deliver biodiversity net gain at the site-level.
- 4.2.11** All biodiversity assets were considered in the ranking, with lesser weighting to priority habitats and Open Mosaic Habitats (OMHs) due to their presence within the majority of SDOs. European sites were given greater weighting, however these were only factored into the rankings where the SDOs coincide or lie adjacent to European sites. As all SDOs lie within the identified Zone of Influence for European sites the potential impacts at the site-level will need to be explored through the HRA.
- 4.2.12** The Medway City Estate SDO is likely to have the least impact on biodiversity, however it still contains some biodiversity assets which may be at risk from new development and the associated threats and pressures. The SDO lies in proximity of European sites and also coincides with a priority habitat, however these factors also apply to the majority of SDOs. In addition, the SDO is located next to the River Medway and therefore lies adjacent to the Medway Estuary MCZ and in close proximity to SSSIs. The Suburban SDO lies in close proximity to many biodiversity assets, however it does also not coincide with any and is therefore also likely to have a lesser impact on biodiversity than other SDOs.

- 4.2.13** The Urban SDO, although mostly comprising of small parcels of previously developed land, may have an increased risk to biodiversity compared to the Medway City Estate and Suburban SDOs. Small sections of the Urban SDO are located adjacent to the Medway Estuary and Marshes European site and SSSI, as well as slightly coinciding with an LWS. As such, development at the Urban SDO may lead to adverse impacts on these designations through the construction, occupation, and increased recreational impacts relating to the proposed development.
- 4.2.14** The Hoo Peninsula SDO covers a large area of undeveloped land. Given its location in close proximity to many biodiversity assets including the High Halstow NNR and several SSSIs, as well as lying adjacent to European sites, development within this SDO has potential to lead to significant adverse impacts, although it is acknowledged there may be some opportunities to avoid the most sensitive locations given the large area covered by the SDO. The Employment SDO also lies adjacent to European sites including their overlapping SSSIs, however it ranks marginally better than the Hoo Peninsula as it does not lie in close proximity to other SSSIs.

*Table 4.4: Impact matrix and ranking of SDOs for SA3 – biodiversity and geodiversity*

SA Objective 3 (Biodiversity and geodiversity)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	-	-	--	-	--	--	-	--	-	-	-	-
Rank	7th	4th	9th	5th	11th	12th	1st	10th	8th	3rd	2nd	6th

#### SA Objective 4 – Landscape and townscape

- 4.2.15** There is likely to be a significant impact on the landscape at a large proportion of SDOs, especially where many are situated on previously undeveloped land in rural areas, where new development is expected to lead to a significant change in landscape character and result in increased urbanisation of the countryside. It is acknowledged that masterplanning and considerate design may reduce these impacts to some extent, and some SDOs are more likely to provide opportunities for redevelopment and enhancement of local character.
- 4.2.16** The SDOs were ranked according to multiple landscape receptors, including the proximity to the Kent Downs National Landscape with potential adverse effects on its setting, proximity to a country park, landscape sensitivity and capacity, and risk to urbanisation of the countryside. The proximity to the Kent Downs National Landscape carried the most weighting due to its significance and distinctiveness.

- 4.2.17** The Chatham Docks, Medway City and Urban SDOs contribute to housing need whilst posing minimal risks to the landscape, as these are primarily made up of previously developed land. Therefore, the greatest risks associated with these SDOs lie from the potential for high-density development and tall buildings, including potential to affect visual receptors across the River Medway (see also SA Objective 9 – Cultural Heritage). The proposed development at these SDOs is expected to have the most scope to mitigate this potential impact through good design, directing new development to the existing urban context. Chatham Docks ranks the best of the SDOs as the proposed development does not risk urban sprawl and is more likely to be in keeping with the surrounding townscape character south of the River Medway, with opportunities for local enhancements through redevelopment schemes.
- 4.2.18** Next in the ranking, the Employment and Suburban SDOs are primarily undeveloped, where a small proportion of both SDOs lie in close proximity to the Kent Downs National Landscape. Both SDOs pose a small but overall minimal risk to increasing urban sprawl in Medway. The Employment SDO ranks marginally worse than the Suburban SDO as a section of the SDO is also located in close proximity to Ranscombe Country Park and coincides with a small area of 'low/medium' landscape sensitivity according to the draft Hoo Landscape Sensitivity and Capacity study (2019)<sup>29</sup>. Additionally, a larger proportion of the Employment SDO is located in predominately rural areas.
- 4.2.19** The Medway Valley and Capstone Valley SDOs have the greatest potential for adverse impacts on landscape. These are primarily comprised of undeveloped land and lie within the setting of the Kent Downs National Landscape and nearby country parks and are therefore likely to significantly alter the setting or character of the National Landscape. Additionally, both SDOs also have potential to increase urban sprawl and coalescence. Overall, the Medway Valley performs marginally worse than the Capstone Valley, as some areas directly coincide with the National Landscape.

Table 4.5: Impact matrix and ranking of SDOs for SA4 – landscape and townscape

SA Objective 4 (Landscape and townscape)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	--	0	-	--	-	--	0	--	--	--	-	0
Rank	11th	1st	6th	8th	5th	10th	2nd	12th	9th	7th	4th	3rd

<sup>29</sup> 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: 21/03/24]

## SA Objective 5 – Pollution and waste

- 4.2.20** All 12 SDOs are expected to result in a negative impact due to the expected significant increase in air, noise and water pollution and household waste generation associated with the large scale of new development proposed. The majority of SDOs coincide or are situated within close proximity to existing sources of pollution, including main roads, AQMAs and railway lines, which has potential to expose current and future residents in these areas to higher levels of air and noise pollution and disturbance.
- 4.2.21** For pollution and waste, SDOs have been ranked considering whether they lie in proximity to AQMAs, main roads or railway lines. In addition, SDOs which lie in proximity to watercourses or groundwater SPZs were also more likely to be ranked lower owing to the potential increased runoff of pollutants with implications for water quality. The proposed development yield for the SDOs has also been considered in terms of the likely scale of pollution generated by the new developments; however, this has a lower weighting than proximity to existing sources of pollution as it is more likely to be dependent on the site-specific layout and design information which is not available for the purpose of this high-level assessment.
- 4.2.22** The Cliffe and Cliffe Woods SDO is expected to result in the lowest level of impact on pollution and waste. It is the only SDO which does not coincide or lie in close proximity within any receptors identified for the pollution or waste SA Objective, primarily due to its rural setting. The East of Rainham SDO ranks marginally worse as a small portion of this SDO lies within 200m of a main road and railway line, despite having a smaller proposed number of houses.
- 4.2.23** Capstone Valley SDO does not lie within 200m of an AQMA, main road or railway, however it ranks slightly higher than the above SDOs as it is wholly situated within SPZ 1, 2 and 3. Consequently, Capstone Valley has potential to significantly increase vulnerability of groundwater to pollution from the proposed development.
- 4.2.24** The most vulnerable SDO in terms of increasing the levels of pollution and waste experienced within Medway is the Hoo Peninsula, followed closely by the Urban SDO. A large area of the Hoo Peninsula and Urban SDO lie within 200m of a main road including the A2, A228 and A289. The Hoo Peninsula is also located adjacent to watercourses, whilst the Urban SDO is situated within an AQMA. Hoo Peninsula was ranked worse overall as it a higher proposed yield of development is proposed in comparison to the Urban SDO, so levels of pollution and waste generated from this SDO are likely to be higher and would be dispersed over a greater area.

Table 4.6: Impact matrix and ranking of SDOs for SA5 – pollution and waste

SA Objective 5 (Pollution and waste)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	-	-	-	-	-	--	--	--	-	--	-	--
Rank	4th	7th	1st	2nd	6th	12th	8th	9th	3rd	10th	5th	11th

## SA Objective 6 – Natural resources

- 4.2.25** There are variations between SDOs with regards to the impact on natural resources within Medway. The potential for degradation of soil health and depletion of natural resources as a result of the large scale of proposed development at the majority of SDOs is likely to result in a significant adverse impact on natural resources. Several of the SDOs also coincide with Mineral Safeguarding Areas (MSAs) and as such the development at these locations could potentially result in sterilisation of important mineral resources. SDOs were ranked according to their proportion of previously developed/undeveloped land and the extent to which this coincides with BMV soil, whilst also factoring in the presence of MSAs.
- 4.2.26** The Suburban SDO has been identified as the best performing option, closely followed by the Urban and Chatham Docks SDOs. All contain no significant areas of previously undeveloped land or potential high quality soils. The Urban and Chatham Docks SDOs rank best overall as these are primarily comprised of developed land. Although these coincide slightly with MSAs, they are likely to have limited opportunities for mineral extraction if land is previously developed. The Suburban SDO has ranked slightly lower as it contains a larger proportion of previously undeveloped land, although this does not comprise BMV soil.
- 4.2.27** The Employment and Medway City Estate SDOs are next in the ranking. The Employment SDO is expected to result in the loss of a small proportion of high quality soil. Alternatively, Medway City Estate SDO is not expected to result in the loss of high quality soil, however a large proportion of the SDO coincides with an MSA and therefore has potential to risk sterilisation of underlying mineral resources and prevent future extraction (if proven to be viable).
- 4.2.28** The Hoo Peninsula and Medway Valley SDOs are primarily made up of previously undeveloped land and are expected to result in the greatest depletion of natural resources, as they are likely to result in a large-scale loss of BMV agricultural soil. In addition, both SDOs have a small area of land which coincides with an MSA. The Hoo Peninsula SDO ranks marginally worse as a large proportion of land coincides with an MSA, and soil of ALC Grade 1.

Table 4.7: Impact matrix and ranking of SDOs for SA6 – natural resources

SA Objective 6 (Natural resources)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	--	0	--	--	-	--	-	--	--	--	0	0
Rank	6th	3rd	7th	8th	5th	12th	4th	11th	10th	9th	1st	2nd

## SA Objective 7 – Housing

- 4.2.29** By definition, all SDOs are expected to deliver a large amount of housing to contribute **towards meeting Medway’s housing need, except for the Employment SDO. The SDOs** were ranked based on the size of proposed residential development that each SDO is expected to deliver, although it should be acknowledged that a combination of SDOs would be needed to meet the total housing requirement and ensure a suitable mix of housing types and tenures.
- 4.2.30** The proposed development is largest at Hoo Peninsula with an indicative housing capacity of 10,893, and in the Urban SDO, with approximately 7,719 homes. These SDOs are likely **to significantly contribute to Medway’s housing need**, the Hoo Peninsula could potentially contribute to 40% of housing need, and the Urban SDO could potentially contribute to 29% of housing need.
- 4.2.31** The Suburban SDO has the smallest proposed development yield of 495. Although it is still likely to contribute to a small proportion of housing yield (2%), this is significantly less than the proposed developments of higher yields.
- 4.2.32** **The Employment SDO is not expected to contribute to Medway’s housing need, as has** therefore been ranked as the lowest performing SDO for SA Objective 7.

Table 4.8: Impact matrix and ranking of SDOs for SA7 – housing

SA Objective 7 (Housing)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	++	++	+	+	0	++	+	+	++	+	+	++
Rank	3rd	4th	6th	8th	12th	1st	9th	10th	5th	7th	11th	2nd

## SA Objective 8 – Health and wellbeing

- 4.2.33** The majority of SDOs have potential to lead to negative impacts on the health objective, in terms of locating residents in areas beyond the recommended sustainable distances to current health infrastructure. There will likely be opportunities to increase healthcare provision through new developments within the SDOs, and improve access to healthcare facilities through wider transport initiatives; however, assessments are based solely upon current provision and do not take account of capacity, where some surgeries are closed to new patients, and the pressures on the hospital services. Within the rankings, the greatest weighting has been given to accessing NHS hospitals and GP surgeries as these may be considered more essential, whilst access to wellbeing services such as leisure centres and greenspace has been given a lower weighting. All SDOs have good access to the PRoW and cycle network so this has not been considered in the rankings.

- 4.2.34** The best performing SDO for health is considered to be the Urban SDO, closely followed by Chatham Docks SDO. Both SDOs are located within a sustainable distance to an NHS hospital with an A&E department, and mostly have good access to greenspace and leisure centres. On the whole, the Urban SDO performs more favourably for health and wellbeing as it has better access, assessed on distances, to GP surgeries than Chatham Docks.
- 4.2.35** Next in the ranking is the Capstone Valley, North of Rainham and Medway City Estate. These SDOs are all partially located within a sustainable distance to the NHS hospital and GP surgeries. These are followed by Cliffe and Cliffe Woods SDO, which performs less favourably than the Medway City Estate SDO for health and wellbeing. The Medway City Estate SDO is located on the other side of the River Medway away from the NHS hospital, and has restricted access to GP surgeries and leisure facilities. However, Cliffe and Cliffe Woods performs strongly for wellbeing as it provides good access to open greenspace and the PRoW and cycle networks.
- 4.2.36** The Hoo Peninsula performs worst overall for health and wellbeing. The SDO is also located on the other side of the River Medway away from the NHS hospital, and has restricted access to GP surgeries and leisure facilities in many areas as it is currently sparsely populated. It is located significantly further away from these facilities than other SDOs, with some areas being located as far as 16km from the NHS hospital.

Table 4.9: Impact matrix and ranking of SDOs for SA8 – health and wellbeing

SA Objective 8 (Health and wellbeing)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	-	+	--	--	--	--	-	--	-	--	0	++
Rank	4th	2nd	7th	9th	11th	12th	6th	10th	5th	8th	3rd	1st

#### SA Objective 9 – Cultural heritage

- 4.2.37** The majority of SDOs are situated in close proximity to heritage assets, however it is considered that some locations would have greater scope to reduce or mitigate adverse impacts on the historic environment than others. SDOs were ranked according to their proximity to listed buildings, scheduled monuments (SMs) and registered parks and gardens (RPGs), and to a lesser extent conservation areas. SDOs in close proximity to historic assets on the Heritage at Risk register were also heavily weighted. Information regarding non-designated heritage features has not been available to inform the assessment and ranking of SDOs.



**4.2.38** The Chatham Docks, Cliffe and Cliffe Woods, Suburban and Capstone Valley SDOs are all located away from designated heritage assets and are therefore unlikely to have a significant negative impact on their setting or character. Although, there may be potential for as yet undiscovered archaeological features or other non-designated historic features to be affected which would need to be explored prior to development, as well as any potential effects on the wider historic environment including any visual impacts on more distant historic assets, such as Upnor Castle and the Historic Dockyard, associated with the development of tall buildings. Although none are located in close proximity to designated heritage assets, they have been ranked according to their distance to heritage assets. These are followed by Medway City Estate and Medway Valley, which lie in close proximity to a small number of heritage assets and therefore have greater potential for adverse effects than the Chatham Docks, Cliffe and Cliffe Woods, Suburban and Capstone Valley SDOs. Medway City Estate SDO coincides with one conservation area and the location of Medway Valley SDO with respect to surrounding heritage assets means that it is more likely that these impacts could be avoided or reduced through design and siting of development.

**4.2.39** In comparison, the Hoo Peninsula and Urban SDOs contain the largest number of heritage assets, including Grade II Listed Buildings, conservation areas and SMs. The Urban SDO has potential to affect more heritage assets overall, given the wide distribution of assets within the urban areas. The proposed development at these SDOs would therefore be more likely to lead to unavoidable adverse impacts on the historic environment within Medway.

*Table 4.10: Impact matrix and ranking of SDOs for SA9 – cultural heritage*

SA Objective 9 (Cultural heritage)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	0	0	0	-	-	--	-	-	-	-	0	--
Rank	4th	1st	2nd	10th	9th	11th	6th	7th	8th	5th	3rd	12th

#### SA Objective 10 – Transport and accessibility

**4.2.40** The ranking of SDOs is based on access to existing transport options, given uncertainties in potential delivery of new public transport and active travel links alongside new development. SDOs were ranked according to proximity to bus stops providing regular services (i.e. offering multiple services per day), railway stations, local services and whether they are located within areas served by high-frequency public transport routes, which refers to locations which lie within 300m of a high-frequency bus stop and 600m of railway station. Lesser weighting was given to their access to pedestrian and cycle networks although this was still considered as a factor.

- 4.2.41** Based on the available information, the Urban SDO and Chatham Docks SDO are considered to be the best options with regards to transport, as these are located within a sustainable target distance to bus stops, railway stations and local services, as well as mostly being located within high frequency public transport routes. The Urban SDO performed marginally better than Chatham Docks due to its stronger links to the pedestrian and cycle networks. However, future development would need to be informed by the emerging STA, particularly given the congested road networks in the urban areas.
- 4.2.42** These are closely followed by the Suburban SDO which ranks slightly lower than the Chatham Docks and Urban SDOs, as the public transport provision is slightly more limited but still strong overall. Next in the ranking are Medway Valley, Medway City Estate and North of Strood. These SDOs are likely to provide the majority of site end users with sustainable access to public transport and local services, however some may remain outside of target distances to current transport and service provision.
- 4.2.43** The Hoo Peninsula and Cliffe and Cliffe Woods SDOs are located outside of a sustainable distance to the majority of public transport provisions and local services, whilst also having more limited but still some access to pedestrian and cycle networks. Although both have somewhat limited access to bus routes, the Hoo Peninsula has ranked slightly higher than Cliffe and Cliffe Woods, as it is served by more frequent bus services.

Table 4.11: Impact matrix and ranking of SDOs for SA10 – transport and accessibility

SA Objective 10 (Transport and accessibility)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	-	++	--	-	--	--	0	0	-	0	+	++
Rank	9th	2nd	12th	8th	10th	11th	5th	4th	7th	6th	3rd	1st

#### SA Objective 11 – Education

- 4.2.44** There is variation in the impact the SDOs will have on education. The assessments are based on sustainable access to schools, and this does not take into account capacity of local schools or mitigation through provision of new school places with development. Most SDOs are likely to provide sustainable access to schools in some areas, however many may leave a large proportion of site end users outside of a sustainable distance of 800m to a primary school, 1.5km to secondary school and 3km from a further educational facility<sup>30</sup>. Proximity to primary and secondary schools has been considered with more weight in the ranking than access to further education.

<sup>30</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

- 4.2.45** The Urban SDO is closest to existing primary and secondary schools as well as further educational facilities, and has therefore been identified as the best performing option. The majority of the Suburban SDO is located within a sustainable distance to most educational facilities, whereas East of Rainham SDO is located within a sustainable distance to schools but outside of a sustainable distance to further educational facilities.
- 4.2.46** The Medway City Estate SDO and Hoo Peninsula SDO are within the middle of the rankings, as they provide access to schools in some areas, and limited access in others. Medway City Estate provides sustainable access to secondary schools, however it has more limited access to primary schools and further educational facilities, due its location on the other side of the River Medway and reflecting its current employment land use. The Hoo Peninsula ranks slightly lower as a large proportion of the SDO is located away from educational facilities, although the southern area of the SDO would be likely to provide a large number of site end users with sustainable access to schools but not to further education.
- 4.2.47** The Capstone Valley SDO and Medway Valley SDO are rurally located and are consequently located largely outside of a sustainable distance to educational facilities, with the closest schools to Medway Valley being in Strood and Snodland (outside Medway administrative area), and the closest schools to Capstone Valley being in urban Medway. Capstone Valley ranks marginally worse than Medway Valley, as it is likely that more students living in the Medway Valley area could reach schools via train whereas those in Capstone Valley would be more reliant on less sustainable modes of travel to reach existing schools, without new infrastructure provision.
- 4.2.48** The Employment SDO has been classed as negligible and omitted from the rankings, as the Employment SDO is unlikely to be useful for education access.

Table 4.12: Impact matrix and ranking of SDOs for SA11 – education

SA Objective 11 (Education)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	--	0	-	+	0	-	-	--	-	-	+	++
Rank	11th	4th	9th	3rd	N/A	6th	5th	10th	7th	8th	2nd	1st

#### SA Objective 12 – Economy and employment

- 4.2.49** The greatest benefit to the local economy would be seen within the Employment SDO, as the proposed development includes approximately 480ha of employment floorspace, increasing the number of employment opportunities for residents in Medway.
- 4.2.50** The residential-led SDOs were ranked primarily according to distance to employment locations and given the broad areas covered by SDOs the assessment does not consider potential changes in land use from employment to residential. All SDOs are located within a sustainable distance to existing employment locations, therefore having a positive impact on access to employment opportunities.

- 4.2.51** Therefore, the next best performing options were the Medway City Estate and Chatham Docks, which are directly located within employment areas.
- 4.2.52** Next in the ranking, the Urban SDO has ranked below the Suburban SDO. Although the Urban SDO provides slightly better access to employment than the Suburban SDO, it is likely that the large proportion of the re-development of brownfield sites may consequently deplete available employment floorspace.
- 4.2.53** Cliffe and Cliffe Woods and the Hoo Peninsula have ranked the lowest as they are primarily rural and therefore locate some site end users away from sustainable access to employment. Cliffe and Cliffe Woods is likely to have a larger proportion of site end users with access to a lower number of employment areas, therefore ranking marginally lower than the Hoo Peninsula.

*Table 4.13: Impact matrix and ranking of SDOs for SA12 – economy and employment*

SA Objective 12 (Economy and employment)	Capstone Valley	Chatham Docks	Cliffe and Cliffe Woods	East of Rainham	Employment	Hoo Peninsula	Medway City Estate	Medway Valley	North of Rainham	North of Strood	Suburban	Urban
SA score	+	+	+	+	++	+	+	+	+	+	+	+
Rank	6th	3rd	12th	11th	1st	10th	2nd	9th	7th	8th	5th	4th

## 4.3 Conclusion

- 4.3.1** Table 4.14 below summarises the overall scores for the SDOs against each SA Objective.
- 4.3.2** It should be noted that 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. Additionally, the SDOs vary in size and capacity (see Figure 4.1 and Table 4.1) and so impacts may vary depending upon the specific development locations within the indicative SDO boundaries. However, 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 Chapter 5).
- 4.3.3** Drawing on the assessment narrative and the relative sustainability performance of the 12 SDOs against each SA Objective as discussed in full within Appendix B and summarised in Tables 4.2 to 4.12 above, the Urban SDO emerges as the best performing option the most often, ranking 1<sup>st</sup> against SA Objectives 8 (health), 10 (transport) and 12 (economy).
- 4.3.4** The Suburban SDO and Chatham Docks SDO also perform relatively well, each ranking 1<sup>st</sup> against two SA Objectives (Suburban against SA Objectives 1 – climate change mitigation and 6 – natural resources; and Chatham Docks for SA Objectives 4 – landscape and 9 – cultural heritage). The strong performance of these three SDOs highlights the importance of a 'brownfield first' approach in avoiding or reducing potential for adverse effects on various environmental receptors.

**4.3.5** In contrast, the worst performing SDO is the Hoo Peninsula, ranking the lowest against SA Objectives 1 (climate change mitigation), 3 (biodiversity), 5 (pollution and waste), 6 (natural resources) and 8 (health). The Hoo Peninsula SDO encompasses a large and rural area where there are a range of potential adverse effects associated with the introduction of a large quantum of growth in small settlements and in proximity to sensitive ecological receptors.

Table 4.14: Summary impact matrix of spatial delivery options

	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	++	++	--	++	++	+

## 4.4 Selection and rejection

**4.4.1** 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; these are evaluated in Chapter 5 and information regarding the selection and rejection of reasonable alternative spatial strategies is discussed in section 5.4.

## 5 Assessment of spatial growth options

### 5.1 Preface

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

5.1.2 **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.

5.1.3 Drawing on information gathered through Call for Sites exercises and the Interim LAA<sup>31</sup> 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 5.1. 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 Chapter 4). Figure 5.1 shows the broad geographic distribution of development under the three options.

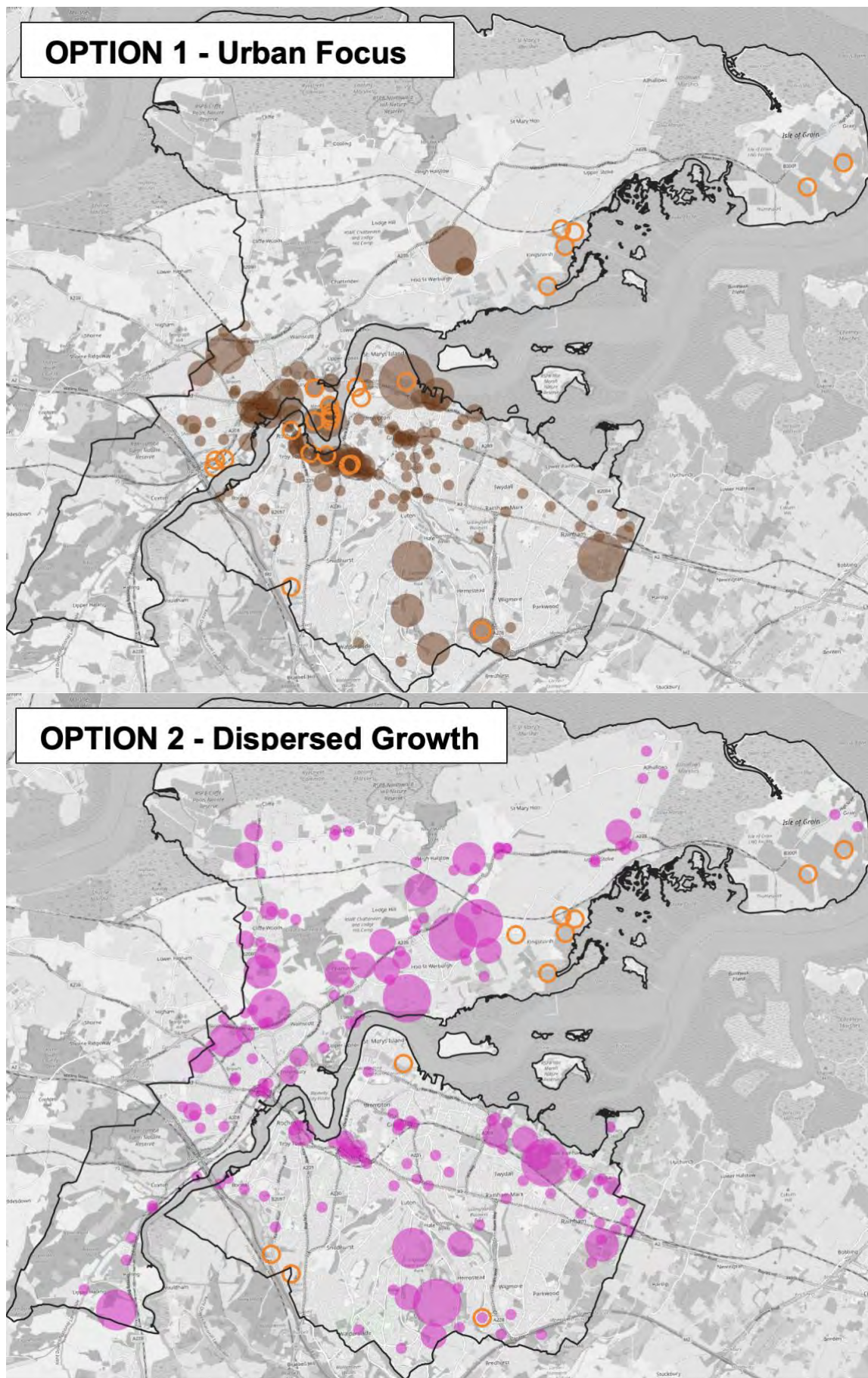
Table 5.1: Spatial growth options identified by Medway Council

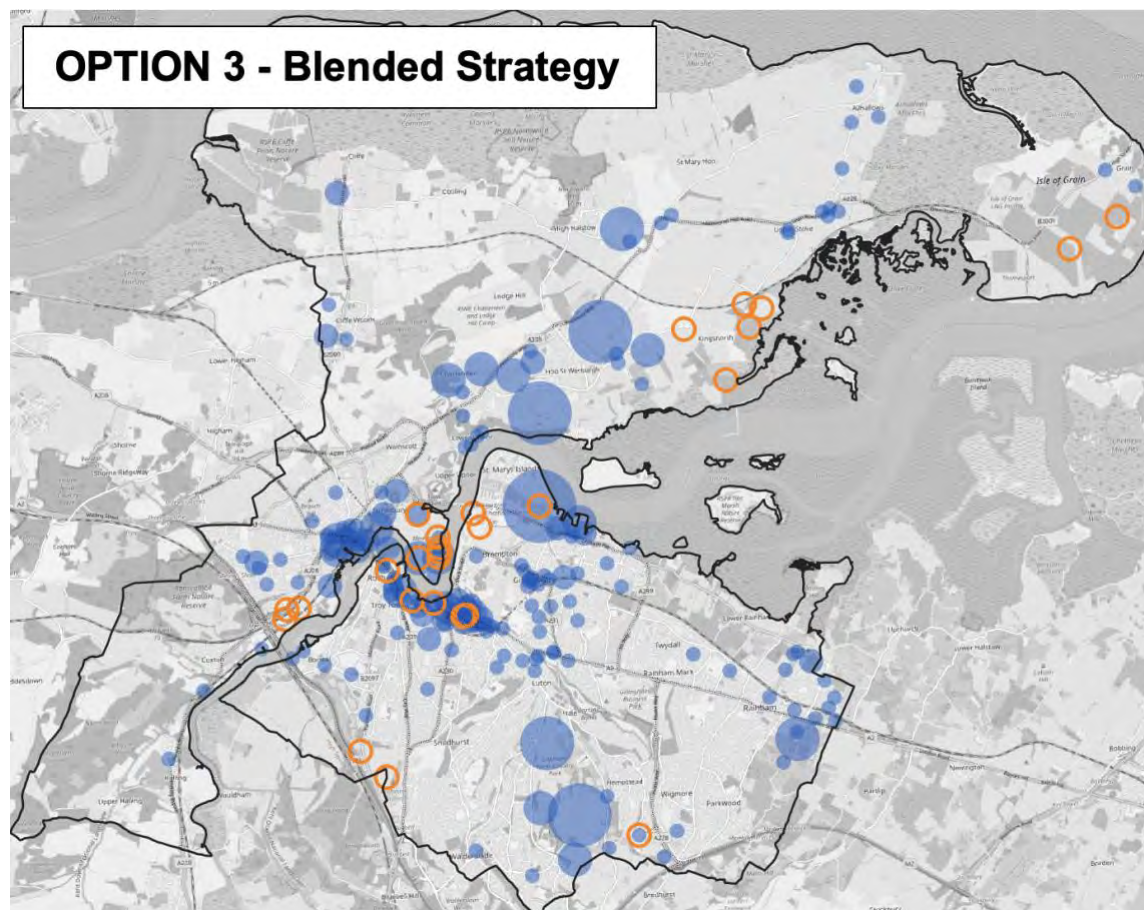
Option	Characteristics of spatial growth option	Relationship to spatial delivery options
1. Urban Regeneration Focus	<p>The Urban Regeneration Focus spatial growth option is characterised by:</p> <ul style="list-style-type: none"> <li>Urban centres catering for everyday needs and acceptable walking distances to public transport nodes.</li> <li>Maximising development on brownfield sites in urban and waterfront areas by applying an additional 25% (apart from Chatham Docks) to represent densification.</li> <li>Limited greenfield development adjoining existing larger settlements, including Strood, Rainham, Lordswood and Hoo St Werburgh.</li> <li>Employment sites are located close to new urban housing, with industry and sui generis uses at Kingsnorth and the Isle of Grain.</li> </ul> <p>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.</p>	<p>The Urban Regeneration Focus spatial growth option comprises the following spatial delivery options:</p> <ul style="list-style-type: none"> <li>Urban (full)</li> <li>Chatham Docks (3,000 homes)</li> <li>Medway City Estate (full)</li> <li>Capstone Valley (partial)</li> <li>East of Rainham (full)</li> <li>Hoo Peninsula (partial)</li> <li>North of Strood (partial)</li> <li>Suburban (full)</li> </ul>
2. Dispersed Growth	<p>The Dispersed Growth spatial growth option is characterised by:</p> <ul style="list-style-type: none"> <li>Extensive release of greenfield and Green Belt land, including Hoo Peninsula, North of Rainham, Medway Valley</li> <li>Sites such as Darland and Deangate, where there is the potential for environmental impacts.</li> </ul>	<p>The Dispersed Growth spatial growth option comprises the following spatial delivery options:</p> <ul style="list-style-type: none"> <li>Urban (partial, i.e. consented developments only)</li> </ul>

<sup>31</sup> 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](https://www.medway.gov.uk/downloads/file/8413/medway_land_availability_assessment_september_2023) [Date accessed: 05/04/24]

Option	Characteristics of spatial growth option	Relationship to spatial delivery options
	<ul style="list-style-type: none"> <li>Limited regeneration where there is not a confirmed or active market interest.</li> <li>Large established employment sites, although the more limited town centre regeneration misses opportunities for mixed use developments.</li> </ul> <p>Based on a minimum yield calculation, this option could accommodate up to 25,615 homes.</p>	<ul style="list-style-type: none"> <li>Chatham Docks (employment land uses only)</li> <li>Capstone Valley (full)</li> <li>Cliffe and Cliffe Woods (full)</li> <li>East of Rainham (full)</li> <li>Hoo Peninsula (full)</li> <li>Medway Valley (full)</li> <li>North of Rainham (full)</li> <li>North of Strood (full)</li> <li>Suburban (full)</li> </ul>
3. Blended Strategy	<p>The Blended Strategy spatial growth option is characterised by:</p> <ul style="list-style-type: none"> <li>Urban and new local centres catering for everyday needs and acceptable walking distances to public transport nodes.</li> <li>Brownfield first with regeneration in town centres and waterfront areas, complemented by suburban and rural areas where development proposals could overcome constraints.</li> <li>Likelihood of avoiding direct impacts on designations.</li> <li>Likelihood of providing for the range of housing types for communities.</li> <li>Density and heights in town centres that are compatible with the Chatham Design Code, other supplementary planning guidance and heritage constraints.</li> <li>Avoiding coalescence of existing settlement <b>patterns, i.e. maintaining a 'strategic gap'</b>.</li> <li>Employment sites are located close to new urban housing, with industry and sui generis uses at Kingsnorth and the Isle of Grain.</li> </ul> <p>Based on a minimum yield calculation, this option could accommodate up to 23,733 homes.</p>	<p>The Blended Strategy spatial growth option comprises the following spatial delivery options:</p> <ul style="list-style-type: none"> <li>Urban (full)</li> <li>Chatham Docks (3,000 homes)</li> <li>Medway City Estate (full)</li> <li>Capstone Valley (partial)</li> <li>Cliffe and Cliffe Woods (partial)</li> <li>East of Rainham (full)</li> <li>Hoo Peninsula (partial)</li> <li>Medway Valley (partial)</li> <li>Suburban (full)</li> </ul>







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Figure 5.1: Maps showing the broad distribution of development for each spatial growth option (extracted from the MLP R18 consultation document)

- 5.1.4** Each option has been assessed using the SA Framework, as set out in the narrative for each SA Objective within section 5.2 below, wherein the relative sustainability performance of the three options against each objective is evaluated using the high-level SA scoring system as presented in Chapter 2.
- 5.1.5** In order to identify the best performing option, each spatial option has been ranked in terms of its performance as measured by each of the specific SA Objectives. The relative **'score' and 'rank' against each SA Objective are presented in** Tables 5.2 to 5.13 and an overall evaluation summarised in section 5.3.
- 5.1.6** 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.
- 5.1.7** Whilst the assessments have been carried out without consideration of detailed mitigation, the relative strengths and weaknesses of the three options have been considered including potential opportunities to alleviate adverse effects within the different strategies for growth.



## 5.2 Assessment

### SA Objective 1 – Climate change mitigation

- 5.2.1** Option 1 would maximise growth in urban centres, including increased density in sustainable locations, and promotes the co-location of housing with existing and proposed employment areas. This option would ensure that the majority of new development is located in areas well served by public transport, helping to reduce reliance on private cars for travel, assuming that there would be sufficient infrastructure capacity to deal with such an uplift. Furthermore, the focus on regeneration would be likely to present opportunities for re-use of brownfield land and existing buildings, with potential to retrofit buildings with higher energy efficiency measures and limit the release of embodied carbon. A minor positive impact on climate change mitigation is identified.
- 5.2.2** Option 2 would see dispersed growth across Medway, which would make it more challenging to deliver, and encourage the uptake of, sustainable transport infrastructure and as such may perpetuate car dependency and require longer travel times, with implications for GHG emissions. The release of undeveloped land under Option 2 would result in the loss of agricultural land and other green infrastructure, potentially reducing the areas resilience to climate change impacts, where undeveloped land plays a crucial role in carbon sequestration. This option could lead to a major negative impact on climate change mitigation.
- 5.2.3** Option 3 presents a hybrid strategy, with urban regeneration in town centres and waterfront locations, complemented by growth in suburban and rural locations where service provision is adequate and has the potential to be enhanced in line with growth. As such, this strategy could lead to mixed effects on climate change mitigation, with some increased car dependency and associated GHG emissions in the more rural areas such as Cliffe and Cliffe Woods and the Hoo Peninsula, coupled with urban growth in proximity to public transport nodes with likely benefits for sustainable travel. On balance, a minor negative impact is identified.

*Table 5.2: Impact matrix and ranking of spatial growth options for SA1 – Climate Change Mitigation*

SA Objective 1 – Climate Change Mitigation	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	+	--	-
Rank	1 <sup>st</sup>	3 <sup>rd</sup>	2 <sup>nd</sup>

## SA Objective 2 – Climate change adaptation

- 5.2.4** Option 1 presents a regeneration-led spatial strategy. Well-planned urban regeneration can include green infrastructure (GI) schemes such as green roofs and permeable pavements, which can help to manage stormwater runoff and reduce the risk of flooding. Concentrating the majority of new development within existing urban areas can help to conserve green spaces and agricultural land, contributing to climate resilience through supporting ecosystem services. On the other hand, increasing density in urban waterfront locations could lead to challenges in terms of flood risk and sea-level rise; there is potential for density uplifts to lead to water drainage systems becoming more easily overwhelmed and more limited space being available for GI and flood defence schemes. Balancing the likely benefits against the challenges to address, an overall negligible impact is identified with regard to climate change adaptation.
- 5.2.5** A dispersed pattern of growth under Option 2 would be likely to result in extensive loss of previously undeveloped land, including in rural areas of the Hoo Peninsula. Under this strategy, the replacement of agricultural land with impermeable surfaces would be likely to increase flood risk, especially when considering the implications for sea-level rise in the future. Extensive release of greenfield land for development would result in the loss of valuable green spaces and agricultural land; the loss of green spaces could intensify the urban heat island effect and reduce the area's resilience to climate change impacts. Although there may still be some limited redevelopment opportunities under Option 2, overall, a minor negative impact is identified.
- 5.2.6** Option 3 proposes a blended strategy with both urban and rural development, which may present similar opportunities to Option 1 in terms of incorporating GI and other adaptive techniques within urban redevelopment schemes to help manage and respond to the challenges presented by climate change. Additionally, by also pursuing some dispersed growth and less urban densification than Option 1, Option 3 may provide more opportunities to retain open spaces and the benefits they provide for ecosystem services, recognising the broader sustainability concerns that Option 1 misses. Whilst there would be some loss of undeveloped land, this would be to a lesser extent than Option 2. Overall, the holistic approach under Option 3 would likely perform the best of the three options and result in a minor positive impact on climate change adaptation.

*Table 5.3: Impact matrix and ranking of spatial growth options for SA2 – Climate Change Adaptation*

SA Objective 2 – Climate Change Adaptation	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	0	-	+
Rank	2 <sup>nd</sup>	3 <sup>rd</sup>	1 <sup>st</sup>

## SA Objective 3 – Biodiversity and geodiversity

- 5.2.7** The emphasis on urban regeneration and brownfield development under Option 1 could lead to mixed effects on biodiversity. This strategy could help to avoid direct adverse impacts on biodiversity designations, such as those within the Hoo Peninsula and Capstone Valley, by limiting development in these areas. However, urban areas can also support distinctive habitats, species, ecological links and GI and there may be some loss of previously undeveloped land or brownfield land with ecological value within the urban area. It can be more feasible for BNG to be delivered off-site for high-density urban development schemes, potentially resulting in localised losses of biodiversity although still contributing towards enhancing biodiversity at the landscape scale. The proposed urban waterfront regeneration could also lead to adverse effects on the adjacent coastal designations along the Medway Estuary. A minor negative effect cannot be ruled out.
- 5.2.8** Option 2 would see a large proportion of growth directed to the rural Hoo Peninsula, in addition to growth dispersed throughout the urban and suburban settlements. Increased development on the peninsula may lead to habitat loss and fragmentation, and disruption to ecological functions and processes. Careful planning and design would be needed to avoid significant adverse impacts on the internationally and nationally important biodiversity designations present in this area, including impacts on functionally linked habitats. The dispersed growth pattern may contribute towards cumulative incremental losses of flora and fauna across Medway, with a possible major negative effect on the whole.
- 5.2.9** Option 3 presents a blended strategy, incorporating brownfield redevelopment schemes as well as some suburban and rural growth. Similarly to Option 1, this could help to avoid direct adverse effects on biodiversity designations and the most sensitive locations. Option 3 would not include the same density uplifts as Option 1 and could reduce the potential for adverse effects associated with loss of ecological links within urban areas. However, it would require larger land-take overall, with some potential for adverse effects particularly in the rural locations. Despite some challenges, the overall impact on biodiversity is assessed as negligible, considering the potential for this option to help maintain strategic gaps between the existing settlement pattern, which could help to conserve important green corridors and facilitate delivery of the emerging Nature Recovery Network.

*Table 5.4: Impact matrix and ranking of spatial growth options for SA3 – Biodiversity and Geodiversity*

SA Objective 3 – Biodiversity and Geodiversity	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	-	--	0
Rank	2 <sup>nd</sup>	3 <sup>rd</sup>	1 <sup>st</sup>

## SA Objective 4 – Landscape and townscape

- 5.2.10** On the basis that Option 1 provides an urban focus for new development and includes only limited development on the Hoo Peninsula, this option is less likely to result in harm **to Medway’s countryside and rural landscape than the other options.** Option 1 would avoid releasing land in the Medway Valley, thereby minimising the potential for adverse effects on the Kent Downs National Landscape and its setting, which is encompassed within the Green Belt. Development on brownfield land is anticipated to result in lesser adverse impacts than those on greenfield land, since urbanised landscapes tend to accommodate change better than open fields with diverse natural features. Whilst the focus on regeneration under Option 1 would open up opportunities for local transformations in areas that currently lack identity or distinctiveness, there is also a possibility of localised adverse effects on existing townscapes through an increase in density, and potential conflicts with local design codes and the setting of heritage assets in strategic views (see SA Objective 9). On balance, the effect of Option 1 on landscape and townscape is identified as negligible.
- 5.2.11** Option 2 would lead to loss of open countryside and likely associated changes to landscape character and the identity of currently rural settlements, although there is some potential to integrate development into the existing urban form. High levels of growth on the Hoo Peninsula, Medway Valley and Capstone Valley, including release of Green Belt land, would give rise to potentially significant adverse effects associated with introducing new development into sensitive landscapes with little capacity, including potential to harm the character and setting of the National Landscape. A major negative impact is identified owing to the likelihood of irreversible and significant change to the existing landscape, although the precise extent of these impacts would be dependent upon site specific location and design details.
- 5.2.12** Option 3 could potentially lead to similar regeneration opportunities as Option 1, but would avoid some of the likely challenges associated with urban densification. For example, Option 3 could avoid building densities and heights that might conflict with local design codes, such as in Chatham. Option 2 would allow for reduced potential for coalescence and help to maintain strategic gaps in the landscape, which could serve to protect views to/from landscape features such as the Kent Downs National Landscape. Despite this, there would likely still be some adverse effects associated with the development around the Hoo Peninsula, Medway Valley and Capstone Valley, albeit to a lesser extent than Option 2 given the lower proportion of growth directed to these areas. On balance, mixed effects would be likely, although a minor negative impact is identified overall.

Table 5.5: Impact matrix and ranking of spatial growth options for SA4 – Landscape and Townscape

SA Objective 4 – Landscape and Townscape	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	0	--	-
Rank	1 <sup>st</sup>	3 <sup>rd</sup>	2 <sup>nd</sup>

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## SA Objective 5 – Pollution and waste

- 5.2.13** Option 1 is expected to result in higher density development in populated areas. This may include opportunities for the redevelopment of existing buildings, as well as taller buildings, which would help to reduce the quantity of land being built on and subsequently the volume of materials needed for development, and as such, could help to reduce pollution and waste created during construction. There is also potential for benefits associated with the remediation of ground contaminants. However, there is a general trend of air pollution in higher density urban areas having more adverse impacts on human health than in air pollution in lower density areas<sup>32</sup>. Development within the urbanised areas of Medway would be more likely to situate residents in areas of existing poor air quality and in proximity to the urban road links where AQMAs have been declared, as well as potential for increased contamination of waterbodies particularly given the focus on waterfront development. Whilst there would be opportunities to maximise public transport use and reduce the need to travel, overall, a minor adverse impact could occur.
- 5.2.14** Under Option 2, the dispersed approach would situate a large proportion of new development away from roads and other existing sources of pollution; however, development is likely to increase waste and pollution in these areas including air, noise, water, light and transport related emissions placing additional pressures on AQMAs. These effects would be exacerbated by the likely losses of trees and vegetation associated with growth in currently undeveloped and rural locations, which would otherwise provide natural screening and filtration of pollutants. Furthermore, by encouraging rural growth it is likely that public transport access would be more limited and journey times would be longer, with adverse implications for transport associated emissions compared to the urban focus under Option 1. Overall, this could lead to a major negative impact on pollution and waste.
- 5.2.15** Option 3 presents a balanced approach incorporating elements of both Option 1 and 2. The focus on growth around public transport nodes would be likely to encourage uptake of more sustainable transport options and reduced reliance on private cars, with potential benefits for air quality. Although, some growth would be directed towards suburban and rural areas with potential for increased pollution and waste generation in these areas during both construction and occupation. It is however recognised that by incorporating some level of dispersal and lesser focus on densification, there may be greater opportunities than for Option 1 to deliver GI schemes alongside development, which would help to reduce runoff of pollutants. On balance, although a minor negative impact could still occur to some extent, Option 3 emerges as the best performing in this regard.

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<sup>32</sup> Yuan, C, Ng, Edwards, Norford, Leslie, K. (2014) Improving air quality in high-density cities by understanding the relationship between air pollution dispersion and urban morphologies, *Building and Environment*, V71, pp245-258, January 2014



Table 5.6: Impact matrix and ranking of spatial growth options for SA5 – Pollution and Waste

SA Objective 5 – Pollution and Waste	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	-	--	-
Rank	2 <sup>nd</sup>	3 <sup>rd</sup>	1 <sup>st</sup>

## SA Objective 6 – Natural resources

- 5.2.16** Option 1 places the greatest emphasis on urban redevelopment, including use of brownfield and previously developed land, with density uplifts in accessible locations. This strategy would be likely to make the most efficient use of land of the three options and require the least land-take to meet the locally identified development needs. However, this option would still involve some limited greenfield development adjoining larger settlements, including around Strood, Rainham, Lordswood and Hoo St Werburgh where there is potential for localised losses of high-quality agricultural land. There may be some additional challenges to overcome in terms of ensuring sufficient water resources infrastructure to cope with the proposed urban density uplifts. However, when considered relative to the other options, a minor positive impact is identified.
- 5.2.17** In contrast, the dispersed growth under Option 2 would be likely to result in a significant, cumulative loss of high-quality agricultural land including large extents of ALC Grade 1, 2 and 3 across the Hoo Peninsula, as well as around Cliffe and Cliffe Woods and North of Rainham. It is anticipated that Option 2 would require substantial investments in water resources infrastructure to accommodate the new growth in areas currently characterised by small-scale settlements. Overall, this option could lead to a major negative impact on natural resources.
- 5.2.18** The hybrid approach under Option 3 would be likely to result in the loss of some important agricultural land but to a lesser extent than Option 2, with greater scope to avoid the pockets of highest grade soils. Option 3's blended strategy may result in more efficient use of existing water infrastructure compared to Options 1 and 2 and could provide some opportunities to incorporate GI measures into redevelopment projects to alleviate pressure on these networks to some extent. Despite these opportunities, a minor negative impact is identified overall, acknowledging the potential losses of agriculturally important soils or land with ecological value.

Table 5.7: Impact matrix and ranking of spatial growth options for SA6 – Natural Resources

SA Objective 6 – Natural Resources	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	+	--	-
Rank	1 <sup>st</sup>	3 <sup>rd</sup>	2 <sup>nd</sup>

## SA Objective 7 – Housing

- 5.2.19** Under Option 1, development would be concentrated within the urban centres. Whilst this would reduce the overall quantity of land required to meet the identified housing need, it would require implementing higher density development to achieve this. Higher density urban development could potentially lead to less choice in housing size and a higher proportion of flats/apartments, although the delivery of affordable housing in the urban area would be likely to provide residents and particularly younger people with access to the housing market in these areas and facilitate the co-location of housing and jobs. Overall, a minor positive impact is identified.
- 5.2.20** Dispersed growth under Option 2 would include more housing development in rural areas, and as such may provide greater flexibility in relation to the range of housing types and tenures that could feasibly be delivered, and help to address affordability issues in rural areas. However, this strategy may not respond as strongly to where housing demand is greatest in the urban/suburban areas, for example within school catchments and in closer proximity to employment opportunities. Despite these uncertainties, a minor positive impact is identified as the identified housing need would be met.
- 5.2.21** Balancing development between both urban and rural areas, as for Option 3, can help to **provide a good range of housing types and tenures to meet the varying needs of Medway's** communities. The blended strategy could potentially perform the best in relation to housing, by striking a balance between urban growth and redevelopment opportunities, alongside some suburban/rural growth which would help to maintain the vitality of the smaller centres, and allow for some market flexibility. A major positive impact is identified.

Table 5.8: Impact matrix and ranking of spatial growth options for SA7 – Housing

SA Objective 7 – Housing	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	+	+	++
Rank	2 <sup>nd</sup>	3 <sup>rd</sup>	1 <sup>st</sup>

## SA Objective 8 – Health and wellbeing

- 5.2.22** Under Option 1, it is likely that the majority of new development would be situated in areas where there are good levels of sustainable accessibility, as measured by distance, to existing healthcare and leisure facilities. However, the emphasis on urban densification could lead to challenges in terms of the capacity of existing healthcare infrastructure in these areas, increased pressure on urban green spaces, and smaller or limited gardens/private outdoor spaces for new dwellings; these factors could have adverse effects on health and wellbeing. On balance, a negligible impact is identified.

- 5.2.23** Option 2 presents a dispersed spatial strategy, which could provide more opportunities to embed healthy living principles within new developments, and would be likely to involve lower density developments with greater access to outdoor space as well as the surrounding countryside. However, this option could also increase the need for travel by car to nearby urban areas leading to adverse health implications associated with increased congestion, and loss of countryside could lead to reduced availability of natural space for outdoor exercise. Sustainable access to existing healthcare facilities would also be more limited for a greater proportion of new residents than Option 1, although if this option facilitated new infrastructure delivery alongside residential growth it could benefit the existing communities in the more rural settlements which currently lack healthcare facilities. Weighing up the sustainability considerations, the overall effect is assessed as negligible.
- 5.2.24** Option 3 could support co-location of new services, including healthcare facilities, integrated open spaces and other GI schemes with benefits to physical and mental wellbeing. The combination of brownfield redevelopment with suburban and rural growth offers opportunities to balance access to existing healthcare facilities with the creation of new amenities in underserved areas, and could help to promote active lifestyles and social cohesion within new or expanded communities. On the whole, this option could perform better than Options 1 or 2 and lead to a minor positive effect on health and wellbeing, although would need careful consideration of density, infrastructure, and green space provision at the local level.

*Table 5.9: Impact matrix and ranking of spatial growth options for SA8 – Health and Wellbeing*

SA Objective 8 – Health and Wellbeing	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	0	0	+
Rank	3 <sup>rd</sup>	2 <sup>nd</sup>	1 <sup>st</sup>

#### SA Objective 9 – Cultural heritage

- 5.2.25** Option 1 prioritises an urban focus including density uplift. A number of important heritage **assets can be found within Medway’s urban areas including** many listed buildings, conservation areas and SMs, particularly clustered around Rochester and Chatham. Without careful consideration of locations and design principles in such areas, development associated with Option 1 could cause adverse impacts on the character and setting of urban heritage assets. However, there may also be opportunities for sympathetic re-use of existing buildings, helping to avoid them falling into disrepair and emphasising the historical land use, or replacement of a building that has a potentially detrimental impact on a conservation area. Mixed effects could therefore be seen under this option, with a negligible impact identified on balance.

- 5.2.26** Whilst the impacts of Option 2 would depend on the site-specific location, context and proximity to heritage features, it is likely that the dispersed growth would lead to a proportion of new development in proximity to heritage assets, including areas with archaeological potential on the Hoo Peninsula. Although there are generally fewer heritage **assets in Medway's more rural areas, the introduction of new development** in these locations may have greater potential to harm heritage assets through direct loss or impacts on their setting, in circumstances where the surrounding countryside and land use relationships contributes to the setting and significance of that asset. As such, the proposed development under Option 2 including greenfield and Green Belt development could potentially have a minor negative impact on cultural heritage.
- 5.2.27** Under Option 3, the blended strategy may provide greater opportunities to avoid **significant adverse effects on Medway's historic urban core than Option 1. As such, Option 3** may be more likely to strike a balance between regeneration/redevelopment and the conservation of historic character within the urban areas. The element of dispersal under Option 1 would however present similar challenges to Option 2, in terms of risks to designated heritage assets and archaeological sites without careful management and masterplanning. Mixed effects would be likely, with an overall negligible impact recorded, although this option could perform marginally better than Option 1 on the whole.

*Table 5.10: Impact matrix and ranking of spatial growth options for SA9 – Cultural Heritage*

SA Objective 9 – Cultural Heritage	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	0	-	0
Rank	2 <sup>nd</sup>	3 <sup>rd</sup>	1 <sup>st</sup>

#### SA Objective 10 – Transport and accessibility

- 5.2.28** Development concentrated in urban areas under Option 1 offers increased opportunities for travel using existing sustainable transport modes rather than private cars, but could also exacerbate existing congestion and highways capacity issues, as well as presenting potential capacity challenges for the current public transport infrastructure. Urban regeneration schemes could however provide opportunities to enhance connectivity to public transport nodes and improve accessibility and permeability within the public realm, with possible benefits in terms of reduced journey times to reach key services and facilities and increased uptake of active travel. Car-free developments could be considered. Overall, an urban focused approach would be likely to lead to a minor positive impact on transport and accessibility, despite potential challenges in terms of transport network capacities.

- 5.2.29** Option 2 would direct a large proportion of development towards rural areas, where the provision of bus services and safe cycling and walking links is likely to be more limited. Dispersing development could also make it more difficult to achieve required transport infrastructure, including electric vehicle networks, to support development. Whilst dispersed growth across a wider area may help to alleviate congestion in urban areas to some extent, this would be dependent on the proximity of new growth to essential services and employment opportunities. Extensive release of greenfield and Green Belt land for development could lead to car-dependent communities and potentially undermine efforts to promote sustainable transportation. Overall, a minor negative effect is anticipated.
- 5.2.30** Option 3's **blended approach allows for both urban regeneration and suburban/rural** development which could help to enhance connectivity between urban and rural settlements. Since this strategy would seek to direct new growth primarily towards the urban and larger suburban/rural settlements, a greater proportion of new residents are likely to be situated in proximity to public transport nodes than under Option 2, and the delivery of walkable neighbourhoods may be more viable. However, there will likely remain some reliance on private cars and this strategy would not wholly alleviate congestion and highways capacity issues. On balance, a negligible impact on sustainable transport and accessibility is identified.

*Table 5.11: Impact matrix and ranking of spatial growth options for SA10 – Transport and Accessibility*

SA Objective 10 – Transport and Accessibility	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	+	-	0
Rank	1 <sup>st</sup>	3 <sup>rd</sup>	2 <sup>nd</sup>

#### SA Objective 11 – Education

- 5.2.31** Option 1's **urban focus would direct development towards areas of Medway that are likely** to provide a range of schools in accessible locations, and urban regeneration schemes may serve to enhance access to existing schools and higher education, especially if development is concentrated near educational hubs such as the Chatham Maritime learning quarter. However, the potential for new education provision may be more limited, and school capacities may be an issue, given the proposed density uplift and limited land availability in the urban area. Considering the benefits in terms of sustainable access to education against the likely strains on infrastructure, overall, a negligible impact is identified.

- 5.2.32** Option 2 would involve dispersed development, including a large proportion of growth in more rural areas where sustainable access to schools is more limited. Rural communities may be more reliant upon private car use to access education given the existing distribution of schools across Medway, and are likely to experience longer travel times, which may limit access to education particularly for children from disadvantaged families without regular car access. On the other hand, development of new communities in rural areas may provide opportunities to establish new schools and distribute demand for school places across a wider area, potentially enhancing access to education for some existing and new residents. Despite these potential benefits, overall Option 2 could lead to a minor negative impact on education.
- 5.2.33** Option 3 presents a hybrid strategy including both urban regeneration and some rural/suburban dispersal, which would help to ensure that a large proportion of new residents are situated in areas within sustainable distances to schools and higher education. **Under Option 3, it is more likely that the diverse needs of Medway's communities could be met in terms of access to existing facilities and opportunities for new schools in suburban/rural locations, although careful planning and investment in new infrastructure would be needed to ensure equal access to education.** Overall, a minor positive impact could be achieved.

Table 5.12: Impact matrix and ranking of spatial growth options for SA11 – Education

SA Objective 11 – Education	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	0	-	+
Rank	2 <sup>nd</sup>	3 <sup>rd</sup>	1 <sup>st</sup>

#### SA Objective 12 – Economy and employment

- 5.2.34** Option 1 focuses on urban regeneration. Well-planned urban regeneration schemes could increase the attractiveness and vibrancy of urban centres and waterfronts, which could in turn attract businesses and increase economic activity, boosting the local economy including the tourism sector. However, this could also have adverse implications for the long-term viability and sustainability of Medway's smaller rural/suburban settlements such as those in Cliffe and Cliffe Woods and Medway Valley which would not see any growth under this spatial strategy. There may also be some infrastructure constraints to overcome, and a need for increased investment to support the level of urban densification proposed. On balance, a minor positive impact is identified.
- 5.2.35** In contrast, Option 2 would result in a more dispersed development pattern. This strategy could help to support small businesses and rural diversification, providing job opportunities in these areas and encouraging investment in infrastructure in the smaller settlements. However, the large proportion of rural growth under this option would risk detracting investment from brownfield sites and may miss urban regeneration opportunities such as Chatham Docks and the Medway City Estate which would be harnessed under Options 1 and 3. On balance, a minor positive impact is identified.

**5.2.36** The hybrid strategy proposed under Option 3 would provide economic opportunities in both urban and rural areas, creating jobs, supporting local businesses and diversifying the economy, as well as encouraging regeneration in town centres/waterfronts. Option 3 could potentially perform the best in relation to the economy and employment, by ensuring that employment sites are located close to new urban housing, and that the majority of new residents are located in areas with good sustainable transport links to reach employment opportunities. A major positive impact is identified.

*Table 5.13: Impact matrix and ranking of spatial growth options for SA12 – Economy and Employment*

SA Objective 12 – Economy and Employment	1. Urban Regeneration Focus	2. Dispersed Growth	3. Blended Strategy
SA score	+	+	++
Rank	2 <sup>nd</sup>	3 <sup>rd</sup>	1 <sup>st</sup>

## 5.3 Conclusion

**5.3.1** Table 5.14 below summarises the overall scores and highlights the best performing option against each SA Objective. Drawing on the assessment narrative and the relative sustainability performance of the three spatial growth options against each SA Objective as discussed in section 5.3 and summarised in Tables 5.1 to 5.13, Option 3 emerges as the best performing option the most often.

**5.3.2** Option 1 focuses on urban regeneration and would avoid the most sensitive rural areas, promoting sustainable travel and reducing reliance on cars, and as such was identified as the best performing option against SA Objectives 1 (climate change mitigation), 4 (landscape and townscape), 6 (natural resources) and 10 (transport and accessibility). However, the 25% uplift in density that would be required to deliver the identified housing and employment needs under such a spatial strategy would be likely to lead to capacity issues and strain on existing infrastructure such as healthcare (SA Objective 8), schools (SA Objective 11) and public transport (SA Objective 10), as well as potential challenges in terms of conserving historic character alongside regeneration schemes (SA Objective 9).

**5.3.3** Option 2 was not identified as the best performing against any of the SA Objectives, although there are notable health and wellbeing benefits to the more dispersed development pattern in terms of access to open spaces associated with lower density schemes (SA Objective 8), as well as the potential to support rural diversification and maintain economic viability of smaller settlements (SA Objective 12). This option could also help to alleviate pressure on existing infrastructure and relieve urban capacity issues. On the other hand, the extensive loss of undeveloped and Green Belt land under Option 2 would be likely to lead to significant adverse effects in terms of climate change mitigation, biodiversity, landscape character and natural resources (SA Objectives 1, 3, 4, 5 and 6).



**5.3.4** Overall, Option 3 is likely to offer the best balance of sustainability considerations by integrating urban regeneration with suburban and rural development, promoting sustainable travel, and addressing the needs of diverse communities. Although, some adverse impacts are likely, including potential for localised adverse effects on the landscape through loss of undeveloped land (SA Objectives 4 and 6), and generation of pollution and waste (SA Objective 5). Careful coordination and planning would be needed to ensure that investments and infrastructure can be directed to address the diverse needs of the community. On the whole, this option is likely 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 5.14: Impact matrix of spatial growth options

	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

## 5.4 Selection and rejection

**5.4.1** Reflecting on the SA findings and the other available evidence for the emerging MLP, the Council consider that:

**5.4.2** *“Option 3 is the preferred Spatial Growth Option because it is more likely to deliver the proposed vision and strategic objectives of the emerging MLP compared to Options 1 and 2. The wider evidence base is in process at the time of writing; however, the Pump Lane (North of Rainham), East Hill and Gibraltar Farm (Capstone Valley) appeal decisions are important considerations.*

**5.4.3** *It is important to recognise that Maidstone Borough Council has adopted its new Local Plan, including the Lidsing Garden Village to the south of the Capstone Valley, although at the time of writing this could be subject to judicial review.*

**5.4.4** *Option 3 also reflects the likelihood of new development proposals coming forward, based on dialogue between developers and Medway Council's planning service. Option 3 has been shown to perform better overall compared to Options 1 and 2, and therefore Option 3 is to be presented as Medway Council's proposed spatial strategy as per the Regulation 18 consultation in July 2024".*

## 6 Assessment of reasonable alternative sites

### 6.1 Identification of reasonable alternative sites

**6.1.1** The Medway Call for Sites request opened in November 2022 and closed at the end of February 2023<sup>33</sup>, from which a total of 146 valid submissions were received. Medway Council has since prepared an Interim LAA in October 2023<sup>34</sup> 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 31<sup>st</sup> March 2023);
- Local Development Order for Innovation Park Medway; and
- Vacant and derelict land and buildings.

**6.1.2** 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<sup>35</sup>.

**6.1.3** As a result of this filtering process, the Council has identified a total of 359 reasonable alternative sites for assessment in the SA process. These sites have the potential to accommodate new residential and employment development, factoring in the latest available evidence.

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<sup>33</sup> Opus Consult (2023) Medway Call for sites 2022. Available at: <https://medway.oc2.uk/document/5> [Date accessed: 25/01/24]

<sup>34</sup> 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](https://www.medway.gov.uk/downloads/file/8413/medway_land_availability_assessment_september_2023) [Date accessed: 05/04/24]

<sup>35</sup> Footnote 7 of the NPPF (December 2023) 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 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, 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 72); and areas at risk of flooding or coastal change."*

**6.1.4** The Council has 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.

**6.1.5** A total of 24 strategic sites (of which 19 are residential-led and 5 are employment-led) have been identified by the Council and are listed in Table 6.1.

*Table 6.1: The 24 reasonable alternative strategic development sites identified by Medway Council*

Strategic site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
AS13	All Saints	Residential led (mixed-use)	32.73	368
AS21	All Saints	Residential led (mixed-use)	41.62	390
AS22	All Saints	Residential led (mixed-use)	32.68	300
AS24	All Saints	Non-residential	158.60	0
AS26	All Saints	Non-residential	85.25	0
CHR4	Cuxton, Halling & Riverside	Residential led (mixed-use)	63.12	1,100
HHH12	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	131.27	1,850
HHH22	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	72.77	1,500
HHH26	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	39.81	760
HHH3	Hoo St Werburgh & High Halstow	Residential led	23.83	500
HHH31	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	79.58	2,000
HHH35	Hoo St Werburgh & High Halstow	Non-residential	76.00	0
HHH36	Hoo St Werburgh & High Halstow	Non-residential	114.11	0
HHH6	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	35.32	550
HW1	Hempstead & Wigmore	Residential led	67.44	500
LW6	Lordswood & Walderslade	Residential led	46.80	800
LW8	Lordswood & Walderslade	Residential led	87.79	2,075
RN8	Rainham North	Residential led (mixed-use)	24.86	500
RSE10	Rainham South East	Residential led (mixed-use)	41.58	850
SMI5	St Marys Island	Non-residential	42.41	0
SMI6	St Marys Island	Residential led (mixed-use)	57.71	3,000
SNF3	Strood North & Frindsbury	Residential led	39.02	800
SR17	Strood Rural	Residential led (mixed-use)	48.70	900
SR9	Strood Rural	Residential led (mixed-use)	27.07	792

**6.1.6** The remaining 335 non-strategic sites identified by the Council are listed in Table 6.2.

*Table 6.2: The 335 reasonable alternative development sites identified by Medway Council*

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	90
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	25

Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
AS28	All Saints	Residential led	1.21	25
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	35
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	90
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	175
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	Non-residential	2.64	0
CCB26	Chatham Central & Brompton	Residential led (mixed-use)	0.43	49
CCB27	Chatham Central & Brompton	Residential led (mixed-use)	0.06	30
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	400
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
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	Non-residential	1.83	0

Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
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	111
FP10	Fort Pitt	Residential led	2.46	170
FP11	Fort Pitt	Residential led (mixed-use)	0.59	200
FP12	Fort Pitt	Residential led	0.28	70
FP14	Fort Pitt	Residential led	0.01	6
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	120
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	445
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	200
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
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	30
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

Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
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	260
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	Residential led (mixed-use)	13.90	400
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	100
HHH25	Hoo St Werburgh & High Halstow	Residential led	3.78	100
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	65
HHH30	Hoo St Werburgh & High Halstow	Residential led (mixed-use)	0.81	30
HHH32	Hoo St Werburgh & High Halstow	Residential led	0.79	6
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	65
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	Non-residential	21.03	0
HW5	Hempstead & Wigmore	Residential led (mixed-use)	10.37	266
HW6	Hempstead & Wigmore	Residential led	4.00	88
HW7	Hempstead & Wigmore	Non-residential	1.24	0
HW8	Hempstead & Wigmore	Residential led	0.16	5
L11	Luton	Residential led	0.13	7
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	10
LW2	Lordswood & Walderslade	Residential led	0.13	18
LW3	Lordswood & Walderslade	Residential led	0.27	17



Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
LW4	Lordswood & Walderslade	Residential led	27.41	425
LW5	Lordswood & Walderslade	Residential led (C2 use)	0.18	0
LW7	Lordswood & Walderslade	Residential led	23.13	451
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	60
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	25
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	48
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	374
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	106
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

Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
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	350
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	450
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	9
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	300
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	602
SNF43	Strood North & Frindsbury	Residential led	3.75	123
SNF44	Strood North & Frindsbury	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	60
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	68
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	181
SR27	Strood Rural	Residential led	2.04	31
SR29	Strood Rural	Non-residential	0.16	0
SR3	Strood Rural	Residential led	0.60	5
SR30	Strood Rural	Residential led (mixed-use)	0.56	102
SR31	Strood Rural	Residential led (mixed-use)	1.39	311

Site reference	Ward	Proposed site use	Net area (ha)	Housing capacity
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	30
SR35	Strood Rural	Non-residential	0.98	0
SR36	Strood Rural	Residential led (mixed-use)	2.25	200
SR37	Strood Rural	Residential led (mixed-use)	1.89	428
SR38	Strood Rural	Residential led (mixed-use)	1.32	100
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	7
SR48	Strood Rural	Residential led	0.25	8
SR49	Strood Rural	Residential led	0.24	15
SR5	Strood Rural	Residential led	4.22	122
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	45
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	6
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	9
W4	Watling	Residential led	0.03	5
W7	Watling	Residential led	0.39	21
W8	Watling	Residential led	0.32	7

## 6.2 Overview of site assessments (pre-mitigation)

**6.2.1** Chapter 2 sets out the methodology used to appraise reasonable alternatives and options in the SA process, and topic-specific methodologies for the assessment of reasonable alternative sites in Appendix C sets out how the likely impact per receptor has been identified in line with the local context and assumptions.

**6.2.2** The assessment of the 24 strategic sites, including rationale for the recorded impacts, is presented in full in Appendix D. The assessment of the 335 reasonable alternative sites, including rationale for the recorded impacts, is presented in full in Appendix E.

- 6.2.3** A summary of the impact matrices for all reasonable alternative site assessments pre-mitigation is presented in Tables 6.3 and 6.4. These impacts should be read in conjunction with the assessment text narratives in the relevant appendix as well as the topic-specific methodologies and assumptions presented in Appendix C.
- 6.2.4** The overall impact symbol for each site shown in Tables 6.3 and 6.4 below for each SA Objective is represented by the lowest common denominator (as per the methodology in Table 2.4), whereas the assessment of strategic and non-strategic sites within Appendix D and E document likely impacts on receptors within each SA Objective, providing a finer grain evaluation.

#### Strategic sites

- 6.2.5** Table 6.3 presents a summary of the assessment findings for the reasonable alternative strategic sites, pre-mitigation.
- 6.2.6** The 24 strategic sites assessed within Appendix D 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.
- 6.2.7** Positive impacts were identified for strategic sites in relation to the provision of new housing and employment floorspace, significantly contributing to the identified need, as well as benefits to health and accessibility as many sites are located within sustainable distance to public greenspaces and will provide on-site greenspace. Additionally, the strategic sites are located within sustainable distance to the PRow network and cycle networks, including enhancements to these networks on-site. Positive impacts were identified in terms of access to social infrastructure, due to their location in areas of good sustainable access to local shops, primary schools, employment opportunities; and additionally, will provide new social infrastructure on-site for new and current residents.
- 6.2.8** Identified negative impacts for strategic sites included the potential for significant losses of soil resources at large undeveloped sites, impacts on biodiversity designations, with direct impacts on European sites and SSSIs, significant changes to local views and impacts on views from the PRow network owing to the large development proposed at the sites and possible alteration of the character or setting of cultural heritage assets. The large undeveloped nature of the strategic sites would also have potential to increase the risk of urban sprawl and coalescence, and in some areas, possible adverse effects on the setting of the Kent Downs National Landscape located to the south of Medway. Negative impacts were also identified for some sites in relation to poor access to healthcare and secondary schools, where sites are located beyond the sustainable target distances, although some sites would be likely to provide new infrastructure on site. Identified negative impacts also included the location of strategic sites within Flood Zones 2 and 3 and areas of high surface water flood risk, locating site users in areas vulnerable to flooding, and with potential adverse effects on water quality.

Table 6.3: Summary impact matrix of all reasonable alternative strategic sites (pre-mitigation)

Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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)	+/-	--	--	-	--	--	++	-	-	-	-	+
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)	+/-	-	-	-	--	--	++	-	-	++	0	++
HHH12	Residential led (Mixed-use)	+/-	--	--	--	--	--	++	-	-	-	+	++
HHH22	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)	+/-	+	--	-	--	-	++	-	-	-	-	++
RSE10	Residential led (Mixed-use)	+/-	+	-	-	--	--	++	-	-	++	+	++
SMI5	Non-residential	+/-	--	--	-	--	+	0	+	0	++	0	+/-
SMI6	Residential led (Mixed-use)	+/-	--	--	-	--	+	++	+	0	++	-	++
SNF3	Residential led	+/-	-	-	-	--	--	++	-	0	-	-	++
SR17	Residential led (Mixed-use)	+/-	--	-	-	--	--	++	-	-	-	+	++
SR9	Residential led (Mixed-use)	+/-	+	-	-	--	--	++	-	0	-	-	++

### Non-strategic sites

**6.2.9** Table 6.4 presents a summary of the assessment findings for the reasonable alternative non-strategic sites, pre-mitigation.

**6.2.10** The impact matrix provides a high-level indication of the nature and magnitude of impacts pre-mitigation. All assessment information excludes consideration of detailed mitigation i.e. additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. Presenting assessment findings 'pre-mitigation' facilitates transparency to the decision makers.

**6.2.11** Positive impacts were identified in relation to the provision of new housing and employment floorspace, contributing to the identified needs, as well as benefits to health and accessibility as many sites are located within sustainable distance to public greenspaces, the PRoW and cycle networks. Additionally, positive impacts were identified in terms of access to social infrastructure, due to the location of many reasonable alternative sites in areas of good sustainable access to local shops, schools, and employment opportunities. Positive impacts also include the location of many reasonable alternative sites within Flood Zone 1 where fluvial flood risk is low.

**6.2.12** Identified negative impacts included the potential for losses of ecologically and agriculturally important soil resources at large previously undeveloped sites, pressures on biodiversity designations, possible alteration of the character or setting of cultural heritage assets and increased urbanisation of the countryside. Potential negative impacts were identified where development sites could cause alteration to the setting of the Kent Downs National Landscape located to the south of Medway. Negative impacts on health were also identified in relation to more rural sites with poor access to healthcare facilities, and sites located in close proximity to sources or air pollution including AQMAs and main roads. Some reasonable alternative sites were located in areas of high surface water flood risk, or in areas where there is greater potential for deterioration of the quality of groundwater and watercourses. It should also be noted that even where new development is allocated within sustainable distances to services including healthcare, there may be adverse effects associated with increased pressure on these services.

Table 6.4: Summary impact matrix of all reasonable alternative non-strategic sites (pre-mitigation)

Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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	+/-	-	--	-	+/-	-	+	-	0	-	0	+
AS25	Residential led	+/-	+	-	-	-	-	+	-	0	-	-	+
AS28	Residential led	+/-	--	--	-	-	-	+	-	-	-	-	+
AS29	Residential led	+/-	-	-	-	+/-	-	+	-	0	-	-	+

Site ref.	Site use	1 Climate change mitigation	2 Climate change adaptation	3 Biodiversity and geodiversity	4 Landscape and townscape	5 Pollution and waste	6 Natural resources	7 Housing	8 Health and wellbeing	9 Cultural heritage	10 Transport and accessibility	11 Education	12 Economy and employment
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	+/-	-	-	+/-	-	+	+	+	-	-	+	+
CCB23	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-
CCB24	Residential led (Mixed-use)	+/-	--	-	+/-	-	+	+	+	0	++	+	+/-
CCB25	Non-residential	+/-	--	-	-	--	+	0	-	--	++	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	+/-	-	-	+/-	--	-	++	+	-	++	+	+
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	+/-



Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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
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	Non-residential	+/-	--	-	-	--	-	0	-	0	-	0	++
CHR14	Residential led (Mixed-use)	+/-	--	-	-	-	-	+	-	-	-	-	+/-
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	+/-
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	++	+	-

Site ref.	Site use	1 Climate change mitigation	2 Climate change adaptation	3 Biodiversity and geodiversity	4 Landscape and townscape	5 Pollution and waste	6 Natural resources	7 Housing	8 Health and wellbeing	9 Cultural heritage	10 Transport and accessibility	11 Education	12 Economy and employment
GN15	Residential led (Mixed-use)	+/-	--	--	-	--	+	++	-	0	++	+	+/-
GN3	Residential led	+/-	--	-	+/-	--	+	++	+	0	++	+	--
GN4	Residential led	+/-	--	-	-	-	+	+	+	0	++	+	+
GN5	Residential led	+/-	-	-	+/-	-	-	+	+	0	++	+	+
GN6	Residential led (Mixed-use)	+/-	--	--	-	--	-	++	+	-	++	-	+/-
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	Residential led (Mixed-use)	+/-	--	-	-	--	-	++	-	0	-	-	+/-
HHH21	Non-residential	+/-	--	--	+/-	-	+	0	-	0	-	0	+/-
HHH23	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	-	+/-
HHH24	Residential led	+/-	-	-	-	--	-	++	-	--	-	-	+
HHH25	Residential led	+/-	-	-	-	--	-	++	-	-	-	-	+
HHH28	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	-	+/-
HHH29	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	-	+/-

Site ref.	Site use	1 Climate change mitigation	2 Climate change adaptation	3 Biodiversity and geodiversity	4 Landscape and townscape	5 Pollution and waste	6 Natural resources	7 Housing	8 Health and wellbeing	9 Cultural heritage	10 Transport and accessibility	11 Education	12 Economy and employment
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	Non-residential	+/-	-	-	-	--	--	0	-	0	-	0	++
HW5	Residential led (Mixed-use)	+/-	--	-	-	--	+	++	-	0	-	-	+/-
HW6	Residential led	+/-	-	-	-	-	-	+	-	0	-	-	+
HW7	Non-residential	+/-	-	-	-	--	-	0	-	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	-	-	+/-
LW2	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
LW3	Residential led	+/-	+	-	+/-	-	-	+	-	0	-	-	+
LW4	Residential led	+/-	--	--	-	--	--	++	-	0	-	-	+
LW5	Residential led	+/-	+	-	+/-	-	+	+	-	0	-	0	+/-
LW7	Residential led	+/-	-	-	-	--	--	++	-	0	-	-	+
PP1	Residential led	+/-	-	--	-	-	-	+	-	0	-	+	+
REWW3	Residential led	+/-	--	-	+/-	-	+	+	-	0	++	+	-
RN1	Residential led	+/-	--	--	-	--	-	++	-	0	-	-	+
RN10	Residential led	+/-	-	--	-	-	-	+	-	-	-	-	+
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	++	+	-

Site ref.	Site use	1 Climate change mitigation	2 Climate change adaptation	3 Biodiversity and geodiversity	4 Landscape and townscape	5 Pollution and waste	6 Natural resources	7 Housing	8 Health and wellbeing	9 Cultural heritage	10 Transport and accessibility	11 Education	12 Economy and employment
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	+/-	-	-	+/-	-	+	+	-	-	++	+	+
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)	+/-	+	-	+/-	-	+	+	+	-	++	+	+/-

Site ref.	Site use	1 Climate change mitigation	2 Climate change adaptation	3 Biodiversity and geodiversity	4 Landscape and townscape	5 Pollution and waste	6 Natural resources	7 Housing	8 Health and wellbeing	9 Cultural heritage	10 Transport and accessibility	11 Education	12 Economy and employment
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	++	+	+/-
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	+	-	+/-

Site ref.	Site use	1 Climate change mitigation	2 Climate change adaptation	3 Biodiversity and geodiversity	4 Landscape and townscape	5 Pollution and waste	6 Natural resources	7 Housing	8 Health and wellbeing	9 Cultural heritage	10 Transport and accessibility	11 Education	12 Economy and employment
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	-	-	+/-
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	++	+	+

## 7 Assessment of policies

### 7.1 Preface

**7.1.1** The MLP will contain a suite of strategic, thematic and development management policies to help guide new development in the Medway area, ensuring contributions towards **achieving the Council’s aspirations for sustainable growth.**

**7.1.2** The draft policies will help to ensure that potential adverse effects, as identified in the SA process, are avoided or mitigated in line with the mitigation hierarchy.

**7.1.3** At this stage of the plan making process, a total of 89 draft policies have been prepared by the Council and presented in the Medway Local Plan Regulation 18 Consultation document, as listed in Table 7.1. The draft policies are associated with the following themes:

- Vision and spatial development strategy;
- Natural environment;
- Built environment;
- Housing;
- Economic development;
- Retail and town centres;
- Transport;
- Health, communities and infrastructure;
- Minerals supply;
- Waste management; and
- Energy.

**7.1.4** The sustainability performance of each draft policy has been evaluated based on the SA Framework (see Appendix A) and the methodology as set out in Chapter 2. The assessments are set out in full within Appendix F. This chapter summarises the results of these assessments.

*Table 7.1: List of draft policies within the Regulation 18 MLP*

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 Area of Outstanding Natural Beauty National Landscape
DM1	Flood and water management
DM2	Contaminated land
DM3	Air quality
DM4	Noise and light pollution



Reference	Policy name
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
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
S13	Innovation Park Medway
T12	Learning and development skills
T13	Tourism, culture and visitor accommodation
S14	<b>Supporting Medway's culture and creative industries</b>
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

Reference	Policy name
DM14	Dockside
DM15	Monitoring and managing development
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 and playing pitches
DM21	New open space and playing pitches
T29	Community and cultural facilities
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

## 7.2 Overview of policy assessments

**7.2.1** The summary impact matrices for all draft policy assessments are presented in Table 7.2. These impacts should be read in conjunction with the assessment text narratives in Appendix F.

**7.2.2** For the majority of draft policies, the assessment has identified negligible, minor positive or major positive effects. Negligible impacts are identified where the policy does not directly influence the achievement of that SA Objective, which is the case for many of the **more 'thematic' policies**.

**7.2.3** A greater range of potential sustainability effects are identified for policies that have potential to introduce new development such as the housing and economic development policies, and waste infrastructure policies, as well as the over-arching development strategy policy which sets out the broad direction of growth over the Plan period. 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.

**7.2.4** Opportunities for enhancement may also be secured through policies in the MLP. Where there are opportunities to improve the sustainability performance of draft policies, or general recommendations for the Council to consider in the Plan making process, these have been identified in the SA (see recommendations in Chapter 9).

Table 7.2: Summary impact matrix 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	-
T1	+	+	+	++	0	+	+	+	+	+	+	+
DM5	+	0	+	+	+	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

	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
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	0
S10	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++
S11	0	0	0	0	0	0	0	0	0	0	0	+
S12	+/-	+/-	+/-	+/-	-	+/-	0	+/-	+/-	+/-	0	++
S13	0	0	0	0	0	0	0	0	0	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	++
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	+

	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
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	+/-	-	-	+	++
T41	+	0	0	0	0	0	0	+	0	0	0	0

## 8 Mitigation

### 8.1 Overview

**8.1.1** The sustainability appraisal of reasonable alternative sites against baseline sustainability information has identified a number of adverse effects associated with the SA Objectives in the SA Framework (see Tables 6.3 and 6.4 and the full assessments against receptors as presented in Appendices D and E). The purpose of this section is to consider if and how these effects can be mitigated by applying the mitigation hierarchy.

**8.1.2** The first stage of the mitigation hierarchy is to consider if the adverse effect can be avoided. This may be possible by not taking forward reasonable alternative sites where potential significant adverse effects have been identified (**e.g. those recorded as a 'major negative' impact in the SA scoring system**). In the case of local plans, especially for local planning authorities where there is a lack of available land without environmental or other constraints, this is unlikely to be wholly possible and there will be a need to consider mitigation.

**8.1.3** For development sites which are likely to be allocated on the basis that the plan makers consider their inclusion to be necessary, despite identified adverse effects in the SA process, mitigation measures should be explored to reduce the overall significance of effect. If it is not possible to mitigate identified adverse effects, these will remain at the end of the SA process and will be declared in the environmental report and non-technical summary.

**8.1.4** One way to reduce adverse impacts identified against baseline receptors is to consider the potential mitigating effects of planning policies.

**8.1.5** Aspects of the policies within the draft MLP (see Appendix F), would be anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the MLP, are avoided.

**8.1.6** At the current stage of plan making, the MLP Regulation 18 Consultation document does not yet include site allocation policies which will be a further means of securing mitigation and sustainable development; such policies will be evaluated in the Regulation 19 SA.

### 8.2 Mitigating effects of the draft MLP policies

**8.2.1** Tables 8.1 to 8.11 list the identified adverse impacts according to SA Objective that could potentially arise following development at the reasonable alternative sites. Each table then goes on to list which, if any, of the draft MLP policies would be likely to help avoid or mitigate these adverse impacts. No adverse impacts were associated with housing (SA Objective 10).

Table 8.1: Mitigating MLP Policy for SA Objective 1 – climate change mitigation

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Increased carbon emissions	<p>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.</p> <p>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 <b>Medway's carbon footprint</b>.</p> <p>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<sub>2</sub>) boilers.</p> <p>Policy DM6 requires development proposals to meet building regulations for energy efficiency and address <b>the climate emergency with regard to Medway's current Climate Action Plan and Corporate Strategy</b>.</p> <p>Policy S25 aims to promote development which supports renewable and low carbon energy technologies, including low carbon hydrogen production.</p> <p>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.</p> <p>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.</p>	<p>Although these policies strongly support a reduction in GHG emissions associated with development, the policies are not expected to fully mitigate GHG emissions from development, including from embodied carbon, emissions from the construction and operation of development, potential loss of carbon stores, and managing increased heat risk.</p>



Table 8.2: Mitigating MLP Policy for SA Objective 2 – climate change adaptation

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Risk of fluvial and tidal flooding (current and future)	<p>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 <b>towards to Environment Agency's flood risk</b> management programme.</p> <p>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.</p> <p>Both Policy T28 (Existing open space and playing pitches) and Policy DM21 (New open space and playing pitches) encourage the use of well-managed open spaces to help mitigate flood risk.</p>	These policies 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.
Risk of surface water flooding	<p>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.</p> <p>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.</p> <p>Policy T28 (Existing open space and playing pitches) and Policy DM21 (New open space and playing pitches) both encourage the use of well-managed open spaces to help mitigate surface water flood risk.</p>	These policies are expected 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	Policy DM1 (Flood and water management) states that <b><i>"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"</i></b> . This includes continued inspection,	This policy 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

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	maintenance, repair and replacement of the existing flood defences.	permitting it only where it can be suitably mitigated.

Table 8.3: Mitigating MLP Policy for SA Objective 3 – biodiversity and geodiversity

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Threats or pressures to international or European sites (SACs, SPAs and Ramsar)	<p>Policy S3 (North Kent Estuary and Marshes designated sites) states that <b><i>"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"</i></b></p> <p>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.</p> <p>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.</p> <p>Policy S5 (Securing strong green and blue infrastructure) encourages the use of green infrastructure to provide the highest level of protection for European sites.</p>	Although these policies are expected to mitigate potential adverse impacts on European sites, the HRA and SAMMS are not yet finalised; consequently, the known impacts on European sites are not expected to be mitigated at this stage.
Threats or pressures to nationally designated sites (SSSIs and MCZs)	<p>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.</p> <p>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.</p>	<p>These policies would help to mitigate potential adverse impacts identified on NNRs, MCZs and SSSIs for the majority of sites.</p> <p>However, at this stage, the policies are not anticipated to fully mitigate adverse effects on SSSIs where proposed sites coincide with, or are located directly adjacent to, SSSIs.</p>

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	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.	These sites should be subject to specific consultation with Natural England.  In addition, the HRA is not yet finalised; consequently, the known impacts on SSSIs where these underpin European sites currently remain uncertain at this stage.
Threats or pressures to the High Halstow NNR, 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 the High Halstow NNR, Local Nature Reserves, Local Wildlife Sites 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) and Policy DM5 (Housing Design) protect existing trees and aim to establish new landscape features that promote biodiversity.	These policies are likely to mitigate potential adverse impacts where development proposals may impact the High Halstow NNR, locally designated or non-statutory biodiversity or geodiversity sites, and will deliver BNG which contributes to improving biodiversity and habitat connectivity.

Table 8.4: Mitigating MLP Policy for SA Objective 4 – landscape and townscape

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Threaten or result in the loss of nationally	Policy S6 (Kent Downs Area of Outstanding Natural Beauty/National Landscape) only allows major development within the Kent Downs National Landscape in exceptional circumstances and seeks to ensure smaller developments contribute to conserving	These policies are expected to ensure that potential adverse impacts on the Kent Downs National Landscape are avoided and respond to key sensitivities

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
designated landscapes	<p>and enhancing the character of the landscapes.</p> <p>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.</p> <p>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.</p> <p>Policy S5 (Securing strong green and blue infrastructure) encourages development proposals to reflect local character through providing multi-functional GI.</p> <p>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.</p>	to conserve and enhance its surrounding landscape character and views.
Threaten or resulting in the loss of the setting or character to a country park	<p>Policy S6 (Kent Downs Area of Outstanding Natural Beauty/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.</p> <p>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.</p>	These policies 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	Policy S4 (Landscape protection and enhancement) requires development proposals to conserve and <b>enhance Medway's local landscape character and</b>	Although these policies are likely to avoid some adverse impacts on locally sensitive and

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
sensitive or locally distinctive landscapes	<p>distinctiveness, such as the North Kent Marshes.</p> <p>Development proposals are encouraged to be located in areas of lower landscape sensitivity and consider visual attributes of the landscape.</p> <p>Policy S5 (Securing strong green and blue infrastructure) encourages development proposals to reflect local character through providing multi-functional GI.</p> <p>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.</p> <p>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.</p> <p>Policy T1 (Promoting high quality design) encourages high quality place making that reflects key characteristics and sensitivities within Medway.</p> <p>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.</p> <p>Various policies such as Policies S15, S17, S18, S19, S19, S21, S23, DM12, T18 and T19 encourage new development to be integrated within their surrounding landscapes and townscapes.</p>	<p>distinctive landscapes, these policies are not expected to ensure that potential adverse impacts on locally distinctive landscapes are avoided. This may result in development impacting sensitive areas, which has limited scope for mitigation.</p>
Increase urban sprawl and coalescence between settlements	<p>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.</p> <p>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.</p> <p>The Spatial Development Strategy stipulates the importance of retaining separation between urban Medway and the Hoo Peninsula through providing</p>	<p>Although these policies 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 <b>Medway's housing need is</b></p>

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>strategic green corridors between the urban and suburban areas.</p> <p>Policy T1 (Promoting high quality design) seeks to retain urban/rural distinctiveness through containing settlements to avoid coalescence.</p>	unlikely to be met without some development contributing to the encroachment of the countryside.

Table 8.5: Mitigating MLP Policy for SA Objective 5 – pollution and waste

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Increase in, and exposure to, air pollution (from AQMA, main roads or railway)	<p>Policy DM3 (Air quality) addresses air quality issues across Medway and promotes appropriate design to improve emission, such as through the installation of electric charging points and introducing low Nitrous Oxide (NO<sub>2</sub>) 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.</p> <p>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.</p> <p>Policy S25 (Energy Supply) and Policy T41 (Heat Networks) support low carbon energy provision for new developments.</p> <p>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 for infrastructure that reduces air pollution levels.</p>	These policies 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	Policy DM1 (Flood and water management) proposes that all new development should integrate the Thames River Basin District Management Plan <sup>36</sup> to improve water quality, including undertaking risk assessments to	These policies are expected to mitigate potential adverse impacts on the quality of

<sup>36</sup> 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](http://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	Commentary: Will the policies mitigate the identified adverse effects?
Source Protection Zones	<p>mitigate impacts on groundwater. Development within a groundwater SPZ will only be permitted providing it has no impact on the groundwater resource.</p> <p>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.</p> <p>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.</p>	groundwater SPZs as result of the proposed development.
Risk of contamination of watercourses	<p>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.</p> <p>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.</p> <p>Policy T40 (Wastewater treatment) promotes effective wastewater disposal in line with regulatory provisions.</p> <p>Policy T7 (Houseboats) ensures there is adequate provision for foul water disposal and disposal of disused vessels, to minimise watercourse contamination from houseboats.</p>	These policies may lessen adverse impacts on water quality; however, they are not expected to fully mitigate impacts 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	<p>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.</p> <p>Policy DM23 (Waste prevention) encourages design principles that minimise waste and locally produced and recycled resources.</p> <p>Policy T37 (Other recovery) supports the provision of energy from waste facilities where waste cannot be reused or recycled.</p>	These policies would be likely to encourage recycling and appropriate waste disposal within new developments; however, the policies are not expected to fully mitigate the likely increase in household waste associated with the proposed growth through the MLP.



Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	Policy T8 (Houses of multiple occupation) supports favourable consideration for development that makes appropriate provision for waste storage.	

Table 8.6: Mitigating MLP Policy for SA Objective 6 –natural resources

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Loss of previously undeveloped land or land with environmental value	<p>The Spatial Development Strategy encourages development proposals to make use of previously developed land and invest in urban areas.</p> <p>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.</p> <p>Policy S4 (Landscape protection and enhancement) aims to contain urban sprawl and therefore limit development on greenfield land.</p> <p>Policy S5 (Securing strong green and blue infrastructure) will help to conserve and enhance the GI network in the borough.</p> <p>Policy S7 (Green Belt) supports the provision of a strong green belt, promoting development away from the countryside and within the urban area.</p> <p>Policy T28 (Existing open space and playing pitches) and Policy DM21 (New open space and playing pitches) encourages adequate open space provision, including the replacement of open space that may be lost to development.</p>	The policies 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) soil	<p>The Spatial Development Strategy encourages development proposals to make use of previously developed land, locating development away from greenfield land with high value soil.</p> <p>Policy S4 (Landscape protection and enhancement) aims to provide local nature recovery networks and improve habitat connectivity, consequently areas of BMV soil.</p>	Although these policies will help reduce the impact of new development on high quality, there are no policies which directly preserve BMV soil. Therefore, these policies are not expected to be sufficient to preserve BMV soil.

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy S5 (Securing strong green and blue infrastructure) will help to conserve and enhance the GI network in the borough, including BMV soil.</p> <p>Policy T10 (Gypsy, Travellers and Travelling Showpeople) will permit new sites that are not located within BMV soils of Grades 1, 2, or 3a.</p> <p>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.</p>	
Loss of Mineral Safeguarding Area (MSA)	<p>Policy T30 (Safeguarding mineral resources) only grants planning permission that would not intervene with current or potential extraction of valuable mineral resources.</p> <p>Policy T31 (Safeguarding of existing mineral supply infrastructure) safeguards existing mineral supply infrastructure from development that may limit their operation.</p>	These policies are expected to mitigate potential adverse impacts on minerals and Mineral Safeguarding Areas, by locating development away from valuable areas for resource extraction.

Table 8.7: Mitigating MLP Policy for SA Objective 8 – health and wellbeing

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to healthcare/leisure facilities	<p>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.</p> <p>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.</p> <p>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.</p>	Although these policies are likely to ensure new development is located near to some healthcare and leisure facilities, there are no policies which are likely to 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

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
		healthcare and leisure facilities.
Net loss of public greenspace	<p>Policy T28 (Existing open space and playing pitches) and Policy DM21 (New open space and playing pitches) encourages adequate open space and greenspace provision, including the replacement of open space or greenspace that may be lost to development.</p> <p>Policy T27 (Reducing health inequalities and promoting health and wellbeing) aims to increase accessibility to recreational opportunities, which includes access to greenspaces.</p> <p>Policy S5 (Securing strong green and blue infrastructure) will help to conserve and enhance the GI network and greenspaces in Medway.</p>	These policies are likely to ensure that development proposals replace any lost greenspace, therefore these policies are expected to mitigate any net losses to public greenspace.

Table 8.8: Mitigating MLP Policy for SA Objective 9 – cultural heritage

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Alteration of character or setting of a heritage asset	<p>Policy S8 (Historic environment) supports development <b>that "positively contributes to local distinctiveness and character"</b>, and <b>"maintains and enhances the significance of designated and non-designated heritage assets and their settings."</b> This includes making sensitive and sustainable reuse of heritage assets, <b>especially those of 'at risk' registers.</b></p> <p>Policy DM9 (Heritage assets) ensures that development that impacts a heritage asset or its setting achieves <b>"a high quality of design which will conserve or enhance the asset's significance and setting."</b> 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.</p> <p>Policy DM10 (Conservation areas) only permits development within a Conservation Area where it <b>"contributes positively to the conservation or</b></p>	These policies are expected to mitigate the identified adverse impacts on the local historic environment which may occur following development proposals, including impacts on the character and/or setting of Listed Buildings, Conservation Areas, SMS and RPGs.

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p><i>enhancement of the character, appearance and distinctiveness of the area."</i></p> <p>Policy S9 (Star Hill to Sun Pier) focuses on conserving and enhancing assets within the identified Heritage Action Zone (HAZ)<sup>37</sup>. New development should focus on <i>"re-establishing the area as a social, cultural and dynamic destination whilst preserving and enhancing the special historic interest and character of the neighbourhood."</i></p> <p>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.</p> <p>Policy S4 (Landscape protection and enhancement) <b>seeks to conserve and enhance Medway's landscape</b> character and local distinctiveness, including its historic character.</p>	

Table 8.9: Mitigating MLP Policy for SA Objective 10 – transport and accessibility

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to bus services	<p>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.</p> <p>Policy T26 (Accessibility standards) requires all proposals to be accessible to a secondary school or social space via a 15-minute bus journey.</p> <p>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-</p>	The proposed improvements to the transport network through the policies 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.

<sup>37</sup> 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]

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>location of services. This includes improving provision for bus links to surrounding areas and services.</p> <p>The Spatial development strategy encourages improved public transport provision, including bus networks.</p> <p>Policy S24 (Infrastructure delivery) aims to ensure that new development proposals provide new and improved infrastructure, including transport provision.</p>	
Limited access to railway stations	<p>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.</p> <p>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.</p> <p>Policy S10 (Economic strategy) encourages employment developments to make use of rail freight transport access.</p> <p>The Spatial Development Strategy encourages improved public transport provision, including railway networks.</p> <p>Policy S24 (Infrastructure delivery) aims to ensure that new development proposals provide new and improved infrastructure, including transport provision.</p>	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 establishing new railway provisions.
Limited access to local services and facilities	<p>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.</p> <p>Policies including Policy T5, T10, T27, S16 and S17 all encourage development to be situated in areas accessible to local services.</p> <p>Policy T4 (Supported housing, nursing homes and older persons accommodation) requires that developments for older people is easily accessible to local services.</p> <p>The Spatial Development Strategy encourages improved public transport provision, promoting links to local services that require minimal travel.</p>	These policies are expected to improve sustainable access to local services and facilities across Medway.

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	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	<p>Policy T26 (Accessibility standards) requires that a variety of local amenities are located within a 15-minute walk or cycleway to major development proposals.</p> <p>Policy T27 (Reducing health inequalities and supporting health and wellbeing) encourages improvements to walking, wheelchair and cycling routes.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Policy T5 (Student accommodation) encourages developments to be well served by walking and cycling options.</p> <p>The Spatial Development Strategy encourages improvements to sustainable travel choices, including providing walkways and cycleways.</p> <p>Policy S24 (Infrastructure delivery) aims to ensure that new development proposals provide new and improved infrastructure, including pedestrian walkways and cycleways.</p>	These policies are expected to improve sustainable access to pedestrian walkways and cycleways across Medway.

*Table 8.10: Mitigating MLP Policy for SA Objective 11 – education*

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to educational opportunities	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	The policies 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.

Table 8.11: Mitigating MLP Policy for SA Objective 12 – economy and employment

Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
Loss of employment floorspace	<p>Policy S10 (Economic strategy) will <b><i>"seek to boost Medway's economic performance, securing a range of jobs for its workforce,"</i></b> 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 S13 (Local development order – Innovation Park Medway) sets out development provision as part of the Innovation Park. In addition, Policy S15 (Town centres strategy) supports extended retail provision and the development</p>	These policies 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.



Identified adverse impact	Potential mitigating influence of MLP policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>of in-centre and edge of centre locations for employment provision outside of designated employment areas.</p> <p>Policy S11 (Existing employment provision) aims to safeguard existing employment sites from loss and redevelopment.</p> <p>The Spatial Development Strategy prioritises urban regeneration and aim to provide a broad range of employment opportunities at various locations within Medway.</p> <p>Policy S14 (<b>Supporting Medway’s culture and creative industries</b>) 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.</p> <p>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.</p> <p>Policy T12 (Learning and skills development) aims to increase apprenticeship opportunities within Medway.</p>	

## 8.3 Post-mitigation site assessments

8.3.1 The impact matrix for all reasonable alternative strategic site assessments, post-mitigation is presented in Table 8.12 and non-strategic sites within Table 8.13. These impacts have been identified following consideration of the likely mitigation effects of the draft MLP policies as discussed in Tables 8.1 to 8.11 above.

8.3.2 Recommendations to further improve the sustainability performance of development sites, and general recommendations for the Council to consider, are presented in Chapter 9.

Table 8.12: Summary impact matrix of all reasonable alternative strategic sites (post-mitigation)

Strategic site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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	+/-
AS26	Non-residential	+/-	-	--	-	--	-	0	-	0	-	0	+/-
CHR4	Residential led (Mixed-use)	+/-	+	-	-	--	--	++	-	0	++	0	++
HHH12	Residential led (Mixed-use)	+/-	+	--	--	--	--	++	-	0	-	+	++
HHH22	Residential led (Mixed-use)	+/-	+	-	-	--	--	++	-	0	+	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	+/-
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	++
RSE10	Residential led (Mixed-use)	+/-	+	-	-	--	--	++	-	0	++	+	++
SMI5	Non-residential	+/-	-	--	-	--	+	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	-	+	++

Table 8.13: Summary impact matrix of all reasonable alternative non-strategic sites (post-mitigation)

Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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	+/-	+	-	-	+/-	-	+	-	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	+/-
AS6	Residential led (Mixed-use)	+/-	+	-	-	-	-	+	-	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	++	+	+/-
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	Non-residential	+/-	-	-	-	--	+	0	-	0	++	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	++	+	+

Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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
CCB33	Residential led	+/-	+	-	+/-	-	+	+	+	0	++	+	+
CCB34	Residential led (Mixed-use)	+/-	-	-	+/-	-	+	+	+	0	++	+	+/-
CCB35	Non-residential	+/-	-	-	-	--	-	0	+	0	++	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	++	+	+
CCB48	Residential led	+/-	+	-	-	-	-	+	+	0	++	+	+
CCB49	Residential led	+/-	+	-	+/-	--	+	++	-	0	++	+	--
CCB5	Non-residential	+/-	-	-	-	--	-	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	Non-residential	+/-	+	-	-	--	-	0	-	0	+	0	++
CHR14	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	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	+/-
CHR19	Non-residential	+/-	+	-	+/-	--	+	0	+	0	++	0	+/-
CHR2	Non-residential	+/-	+	--	-	--	-	0	-	0	+	0	++
CHR20	Residential led	+/-	-	-	-	--	-	++	-	0	+	+	--
CHR21	Non-residential	+/-	-	-	+/-	--	+	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	+/-
FH1	Non-residential	+/-	+	-	-	--	+	0	-	0	-	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	++	+	+

Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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
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	++	+	--
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	++	+	--

Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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
GS7	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
GS8	Residential led (Mixed-use)	+/-	+	-	+/-	-	-	+	+	0	++	+	+/-
HHH1	Non-residential	+/-	+	-	--	--	-	0	-	0	-	0	+/-
HHH11	Residential led	+/-	+	-	-	--	-	++	-	0	-	+	+
HHH14	Residential led	+/-	+	-	-	--	-	++	-	0	-	+	+
HHH15	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
HHH16	Non-residential	+/-	+	-	-	--	-	0	-	0	-	0	+/-
HHH17	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	--
HHH18	Residential led (Mixed-use)	+/-	+	-	--	-	--	+/-	-	0	-	0	+/-
HHH19	Residential led (Mixed-use)	+/-	+	-	-	--	-	++	-	0	-	0	+/-
HHH21	Non-residential	+/-	-	-	+/-	-	+	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	-	+	--
HHH5	Residential led	+/-	+	-	--	-	-	+	-	0	-	+	+
HHH7	Residential led	+/-	+	--	--	--	--	++	-	0	-	+	--
HHH8	Residential led (Mixed-use)	+/-	+	-	-	--	--	++	-	0	-	+	+/-
HHH9	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
HW11	Residential led	+/-	+	-	-	-	-	+	-	0	-	0	+
HW3	Non-residential	+/-	+	-	-	--	--	0	-	0	-	0	++
HW5	Residential led (Mixed-use)	+/-	+	-	-	--	+	++	-	0	-	+	+/-
HW6	Residential led	+/-	+	-	-	-	-	+	-	0	-	0	+
HW7	Non-residential	+/-	+	-	-	--	-	0	-	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	+/-	+	-	+/-	+/-	+	+	-	0	-	0	+/-

Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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
LW7	Residential led	+/-	+	-	-	--	--	++	-	0	-	0	+
PP1	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
REWW3	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	+	+	+
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	+/-
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	+/-
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	++	+	--



Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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
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	-	+	+
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	+/-
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	+/-
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	++	+	+/-
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	++	+	+/-

		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
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	+/-
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	+	+	+/-
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	+
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	++	+	+

Site ref.	Site use	1	2	3	4	5	6	7	8	9	10	11	12
		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
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	++	+	+

## 8.4 Selection and rejection of sites

**8.4.1** Planning Practice Guidance (PPG) on SEA states that the SA process should outline the reasons why alternatives were selected and the reasons the rejected options were not taken forward.

**8.4.2** An overview of the reasons for site selection and rejection of each reasonable alternative sites has been provided by the Council, as summarised in Table 8.13 for strategic sites and Table 8.14 for non-strategic sites. **The Council's preliminary** reasons for selection and rejection of the sites proposed at this stage in the plan making process have been informed through consideration of the SA assessment findings as well as other evidence base information that has been available to the Council at this stage, including wider considerations of the suitability, availability and achievability of potential site allocations.

**8.4.3** Tables 8.13 and 8.14 are intended to provide an overview only. The decision making of the Council in relation to the sites taken forward reflects the findings of the evidence base documents prepared to support the preparation of the MLP, including the findings of the SA, and this information may be reviewed and updated at later stages of the plan making process as more evidence information becomes available.

Table 8.14: Outline reasons for selection / rejection of reasonable alternative strategic sites for the MLP

Strategic site ref	Site use	Selected / 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)	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.
AS22	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.
AS24	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.
AS26	Non-residential	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
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.
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	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	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.
HHH31	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.
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.
RSE10	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
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.

Strategic site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
SNF3	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.
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.
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.

Table 8.15: Outline reasons for selection / rejection of reasonable alternative non-strategic sites for the MLP

Site ref	Site use	Selected / 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	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.
AS15	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.
AS16	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.
AS17	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.
AS18	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.
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)	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.
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	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.
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.
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	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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
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)	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.
CCB11	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.
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)	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.
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	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.
CCB17	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.
CCB18	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.
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.
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 location, making best use of PDL and potential improvement to urban form through redevelopment.
CCB22	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.
CCB23	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.
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	Non-residential	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.



Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
CCB26	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.
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	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.
CCB29	Residential led	Rejected	Potential adverse impact on listed building. Potential adverse impact on Conservation Area.
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	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.
CCB34	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.
CCB35	Non-residential	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.
CCB36	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.
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	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.
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, making best use of PDL and potential improvement to urban form through redevelopment.
CCB40	Residential led	Rejected	Potential adverse impact on Conservation Area.
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	Retain existing land use.
CCB44	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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
CCB46	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.
CCB48	Residential led	Rejected	Potential adverse impact on greenspace. Potential adverse impact on listed building. Potential adverse impact on Conservation Area.
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.
CCB6	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.
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	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.
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.
CHR10	Residential led	Rejected	Potential loss of BMV agricultural land. Within the Green Belt. Within Kent Downs National Landscape.
CHR11	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.
CHR13	Non-residential	Rejected	Potential loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services.
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.
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.
CHR20	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.
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.
CHR5	Non-residential	Rejected	Potential loss of BMV agricultural land. Within the Green Belt.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
CHR6	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.
CHR7	Residential led	Rejected	Potential loss of BMV agricultural land. Within the Green Belt. Beyond reasonable walking distance to current public transport services.
CHR8	Non-residential	Rejected	Residential amenity.
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, 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	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.
FP18	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.
FP19	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.
FP2	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.
FP22	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.
FP23	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.
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	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.
FP5	Residential led	Rejected	Potential adverse impact on listed building. Potential adverse impact on Conservation Area.
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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
FP8	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
FP9	Residential led	Rejected	Potential adverse impact on listed building. Potential adverse impact on Conservation Area.
GN10	Residential led	Rejected	Beyond reasonable walking distance to current public transport services.
GN11	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.
GN13	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.
GN14	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.
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	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.
GN5	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.
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 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.
GS10	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.
GS11	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.
GS12	Residential led (Mixed-use)	Rejected	Retain existing land use.
GS13	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.
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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
GS20	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.
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.
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.
GS29	Residential led	Rejected	Retain existing land use.
GS30	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.
GS32	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.
GS33	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.
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)	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.
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.
GS5	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.
GS6	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.
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)	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.
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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
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	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
HHH16	Non-residential	Rejected	#N/A
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	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.
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.
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 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	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
HHH38	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.
HHH39	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.
HHH4	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.



Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
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.
HW11	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
HW3	Non-residential	Rejected	Close proximity to Ancient Woodland. Potential adverse impact on greenspace. Potential loss of BMV agricultural land. The development could lead to coalescence between settlements.
HW5	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
HW6	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
HW7	Non-residential	Rejected	Potential loss of BMV agricultural land.
HW8	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
L11	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.
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	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.
L3	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.
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	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.
LW4	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.



Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
LW5	Residential led (C2 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.
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	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.
RN12	Non-residential	Rejected	Potential adverse impact on greenspace. Beyond reasonable walking distance to current public transport services.
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.
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	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
RN18	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.
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	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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
RN28	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
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	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
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.
RSE4	Residential led	Rejected	Close proximity to Ancient Woodland. Potential loss of BMV agricultural land.
RSE8	Residential led (Mixed-use)	Rejected	The loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
RSE9	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
RWB1	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.
RWB10	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. Opportunity for sustainable development in accessible location, making best use of PDL and potential improvement to urban form through redevelopment.
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	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.
RWB15	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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
RWB17	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.
RWB18	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.
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	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.
RWB21	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.
RWB23	Non-residential	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.
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	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
RWB4	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
RWB5	Non-residential	Rejected	Potential loss of BMV agricultural land. Beyond reasonable walking distance to current public transport services.
RWB6	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
RWB8	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.
RWB9	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.
SMI1	Residential led	Rejected	Retain existing land use.
SMI2	Non-residential	Rejected	Potential adverse impact on listed building.
SNF1	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.
SNF10	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.
SNF12	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
SNF13	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.
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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
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)	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.
SNF19	Non-residential	Rejected	Potential adverse impact on listed building.
SNF2	Residential led (Mixed-use)	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.
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)	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.
SNF22	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.
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.
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, 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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
SNF36	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.
SNF37	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.
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	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.
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	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.
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.
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.
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.

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
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.
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.
SR3	Residential led	Rejected	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.
SR30	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.
SR31	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.
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	Beyond reasonable walking distance to current public transport services.
SR34	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.
SR35	Non-residential	Rejected	Beyond reasonable walking distance to current public transport services.
SR36	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.
SR37	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.
SR38	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.
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)	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.
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.



Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
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 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	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.
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	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.
SR50	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.
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	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.
SW2	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
SW3	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
SW5	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
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	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.
T1	Non-residential	Rejected	Potential adverse impact on greenspace.
T2	Residential led	Rejected	Loss of BMV agricultural land.



Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
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.
W1	Residential led	Rejected	Retain existing land use.
W11	Non-residential	Rejected	Potential adverse impact on greenspace.
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	Potential loss of BMV agricultural land.
W14	Non-residential	Rejected	Potential loss of BMV agricultural land.
W3	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.
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	Retain existing land use.

## 9 Recommendations

### 9.1 Recommendations for the Medway Local Plan

**9.1.1** Table 9.1 presents a range of recommendations and commentary against each SA Objective, including recommendations for Medway Council to consider in the development and refinement of policies and development sites for the MLP, and more general recommendations in relation to the collection of evidence to inform assessments at future stages.

**9.1.2** These recommendations are not exhaustive, nor are they essential. Further recommendations will be provided where appropriate throughout the plan making process.

*Table 9.1: SA recommendations for the emerging Medway Local Plan*

SA Objective	Recommendations
1: Climate Change Mitigation	<ul style="list-style-type: none"> <li>Provide necessary infrastructure to encourage low carbon options and carbon neutral development where possible.</li> <li>Consider retrofitting buildings to make them more energy efficient.</li> <li>Different approaches to heat decarbonisation and the removal of gas boilers (as advocated under the Future Homes Standard<sup>38</sup>), should be promoted through the MLP including consideration of district heating network connections and / or heat pumps. Opportunities to promote Passivhaus buildings<sup>39</sup> should be considered.</li> <li>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<sup>40</sup>. 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.</li> <li>It is recommended that Whole Life-Cycle Carbon (WLC)<sup>41</sup> 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.</li> <li>The recommendations of the RTPI Planning for Climate Change guidance<sup>42</sup> should be considered.</li> </ul>
2: Climate Change Adaptation	<ul style="list-style-type: none"> <li>Ensure development proposals explore every opportunity to incorporate GI enhancements, recognising the multi-functional benefits of GI including for</li> </ul>

<sup>38</sup> 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: 02/05/24]

<sup>39</sup> Passivhaus Trust. Available at: <https://www.passivhaustrust.org.uk/> [Date accessed: 02/05/24]

<sup>40</sup> Local Partnerships (2023) Greenhouse Gas Accounting Tool and Waste Emissions Calculator. Available at: <https://localpartnerships.org.uk/greenhouse-gas-accounting-tool/> [Date accessed: 02/05/24]

<sup>41</sup> Greater London Authority (2024). Whole Life-Cycle Carbon Assessments guidance. Available at: [www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments](http://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments) [Date accessed: 07/05/24]

<sup>42</sup> 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](https://tcpa.org.uk/wp-content/uploads/2021/11/tcpartpiclimateguide_oct2021_final.pdf) [Date accessed: 13/05/24]

SA Objective	Recommendations
	<p>wildlife, recreation, flood risk mitigation, urban cooling / shading and carbon storage. The role of GI in relation to flood risk is particularly important in the Medway area given its coastal location and the prevalence of fluvial and tidal flood risk.</p> <ul style="list-style-type: none"> <li>• 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<sup>43</sup>.</li> <li>• 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<sup>44</sup>.</li> </ul>
3: Biodiversity and Geodiversity	<ul style="list-style-type: none"> <li>• 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<sup>45 46</sup>, which would reflect the aims of the 25-year Environment Plan<sup>47</sup> and the Environmental Improvement Plan<sup>48</sup>.</li> <li>• 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<sup>49</sup>, is updated to ensure it reflects the latest national policy and guidance including <b>Natural England's Green Infrastructure Framework</b><sup>50</sup>.</li> <li>• The findings and recommendations of the emerging Habitats Regulations Assessment (HRA) of the MLP should be taken into account and incorporated into the policies.</li> </ul>

<sup>43</sup> DEFRA and Environment Agency (2023) Thames Estuary 2100. Available at:

<https://www.gov.uk/government/collections/thames-estuary-2100-te2100> [Date accessed: 02/05/24]

<sup>44</sup> AECOM (2016) Medway Surface Water Management Plan. Available at:

[https://www.medway.gov.uk/downloads/file/2870/medway\\_surface\\_water\\_management\\_plan\\_report](https://www.medway.gov.uk/downloads/file/2870/medway_surface_water_management_plan_report) [Date accessed: 02/05/24]

<sup>45</sup> 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: 25/01/24]

<sup>46</sup> National Infrastructure Commission (2021) Natural Capital and Environmental Net Gain: A discussion paper. Available at:

<https://nic.org.uk/studies-reports/natural-capital-environmental-net-gain/#:~:text=Environmental%20net%20gain%20is%20the,to%20the%20pre%2Ddevelopment%20baseline.&text=Biodiversity%20net%20gain%20is%20a,for%20achieving%20environmental%20net%20gain> [Date accessed: 25/01/24]

<sup>47</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [Date accessed: 25/01/24]

<sup>48</sup> DEFRA (2023) Environmental Improvement Plan 2023. Available at:

<https://www.gov.uk/government/publications/environmental-improvement-plan> [Date accessed: 03/05/24]

<sup>49</sup> 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](https://www.medway.gov.uk/downloads/file/6279/medway_green_and_blue_infrastructure_framework) [Date accessed: 02/05/24]

<sup>50</sup> Natural England (2023) Green Infrastructure Framework. Available at:

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx> [Date accessed: 03/05/24]

SA Objective	Recommendations
	<ul style="list-style-type: none"> <li>• 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).</li> <li>• 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<sup>51</sup>.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
4: Landscape and Townscape	<ul style="list-style-type: none"> <li>• The MLP should ensure development proposals are constructed in accordance with <b>appropriate design guides and codes, including the 'Design: process and tools'</b><sup>52</sup> government guidance. Implementing locally specific guidance is recommended to support local distinctiveness and tailor the approach to reflect local priorities.</li> <li>• 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.</li> <li>• 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 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.</li> <li>• 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<sup>53</sup>.</li> </ul>

<sup>51</sup> Making Space for Nature in Kent and Medway. Available at: <https://www.makingspacefornaturekent.org.uk/> [Date accessed: 03/05/24]

<sup>52</sup> DLUHC & MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 03/05/24]

<sup>53</sup> Kent Downs (2021) Kent Downs AONB Management Plan 2021-2026. Available at: <https://kentdowns.org.uk/management-plan-2021-2026/> [Date accessed: 03/05/24]

SA Objective	Recommendations
	<ul style="list-style-type: none"> <li>Development proposals should embrace the <b>principles of the 2020 'Building Better, Building Beautiful' report</b><sup>54</sup>, promoting the three pillars advocated in the report: <i>"ask for beauty, refuse ugliness and promote stewardship"</i>.</li> </ul>
5: Pollution and Waste	<ul style="list-style-type: none"> <li>Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring.</li> <li>Development proposals should aim to protect areas identified as tranquil. An <b>example method for identifying tranquillity include 'Mapping Tranquillity'</b><sup>55</sup>.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with <b>'Net Zero the UK's contribution to stopping global warming'</b><sup>56</sup>.</li> <li>The findings of the emerging 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.</li> <li>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.</li> <li>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.</li> </ul>
6: Natural Resources	<ul style="list-style-type: none"> <li>The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion.</li> <li>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.</li> </ul>

<sup>54</sup> 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](https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission) [Date accessed: 17/05/24]

<sup>55</sup> CPRE (2005) Mapping Tranquillity. Available at: <https://www.cpre.org.uk/resources/mapping-tranquillity/> [Date accessed: 25/01/24]

<sup>56</sup> 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: 25/01/24]

SA Objective	Recommendations
	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>Medway is located in an area of serious water stress as identified by the Environment Agency<sup>57</sup>. Medway Council should ensure that the findings and <b>recommendations of the water companies' latest Water Resources Management Plans and Drought Plans</b> are taken into account to ensure the proposed levels of growth can be accommodated and that water supply and demand can be balanced.</li> </ul>
7: Housing	<ul style="list-style-type: none"> <li>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<sup>58</sup>. Residential development proposals should incorporate functional private or communal open space, including green space.</li> <li>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<sup>59</sup>.</li> </ul>
8: Health and Wellbeing	<ul style="list-style-type: none"> <li>Development proposals should take into consideration the findings of the latest Playing Pitch Strategy<sup>60</sup> or other relevant documents within the evidence base to ensure that future demands for recreational facilities can be met.</li> <li>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.</li> </ul>

<sup>57</sup> Environment Agency (2021) Water Stressed Areas - final classification. Available at: <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification> [Date accessed: 25/04/24]

<sup>58</sup> 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](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: 03/05/24]

<sup>59</sup> 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/designinggypsiesites.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf) [Date accessed: 02/05/24]

<sup>60</sup> 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](https://www.medway.gov.uk/downloads/file/4522/medway_council_playing_pitch_strategy_-_needs_assessment) [Date accessed: 02/05/24]

SA Objective	Recommendations
	<ul style="list-style-type: none"> <li>In line with the emerging Green and Blue Infrastructure Framework<sup>61</sup>, 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.</li> <li>Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres.</li> </ul>
9: Cultural Heritage	<ul style="list-style-type: none"> <li>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.</li> <li>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 <b>refer to Historic England’s guidance on keeping historic buildings in good repair</b><sup>62</sup>.</li> <li>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<sup>63</sup>.</li> <li>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.</li> <li>The proposed historic environment policies such as Policies DM9 and DM10 <b>could be strengthened by ensuring that development will “conserve and enhance” rather than “conserve or enhance” the significance of heritage assets</b> and conservation areas, ensuring that development conserves and seeks opportunities to enhance heritage assets and their settings.</li> <li>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.</li> </ul>
10: Transport and Accessibility	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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<sup>64</sup>.</li> </ul>

<sup>61</sup> 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: 02/05/24]

<sup>62</sup> 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: 03/05/24]

<sup>63</sup> DLUHC (2014). Historic environment. Advises on enhancing and conserving the historic environment. Available at: [www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment](http://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment) [Date accessed: 09/05/24]

<sup>64</sup> Office for Zero Emission Vehicles (2022) On-Street Residential Chargepoint Scheme. Available at: <https://www.gov.uk/government/publications/grants-for-local-authorities-to-provide-residential-on-street->



SA Objective	Recommendations
	<ul style="list-style-type: none"> <li>It is recommended that development proposals consider the recommendations of the National Cycling Strategy<sup>65</sup> and the National Design Guide<sup>66</sup> 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 <b>'Building for a Healthy Life' guidance which sets out design recommendations</b> 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.</li> <li>Draft Policy T25 <b>'user hierarchy and street design'</b> 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.</li> <li>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.</li> </ul>
11: Education	<ul style="list-style-type: none"> <li>Seek to increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need.</li> <li>Ensure that wherever possible, walkable neighbourhoods and safe routes are created, especially to primary schools.</li> <li><b>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.</b></li> </ul>
12: Economy and Employment	<ul style="list-style-type: none"> <li>Ensure employment-led proposals are located in close proximity to high-frequency bus stops or other sustainable transport options for employees to reach employment opportunities, informed by the latest available accessibility information.</li> <li>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.</li> <li>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.</li> </ul>

[chargepoints/grants-to-provide-residential-on-street-chargepoints-for-plug-in-electric-vehicles-guidance-for-local-authorities](#) [Date accessed: 03/05/24]

<sup>65</sup> Highways England (2016). Cycling Strategy. Available at: [https://assets.publishing.service.gov.uk/media/5a81965fed915d74e33ff04f/S150572\\_Cycling\\_Strategy.pdf](https://assets.publishing.service.gov.uk/media/5a81965fed915d74e33ff04f/S150572_Cycling_Strategy.pdf) [Date accessed: 09/05/24]

<sup>66</sup> DLUHC (2019). National design guide. Available at: [www.gov.uk/government/publications/national-design-guide](http://www.gov.uk/government/publications/national-design-guide) [Date accessed: 09/05/24]

# 10 Consultation and next steps

## 10.1 Consultation on the Regulation 18 SA Report

**10.1.1** This Regulation 18 SA Report is subject to consultation with statutory consultees, stakeholders and the general public alongside the Draft MLP.

**10.1.2** This report represents the latest stage of the SA process. The SA process will take on board any comments on this report and use them to inform future SA outputs.

**10.1.3** Once Medway Council have reviewed comments received during the forthcoming Regulation 18 consultation and have begun preparing the next version of the MLP (Regulation 19 stage), preparation of an Environmental Report will begin, also known as a full SA report. The Environmental Report will include all of the legal requirements set out in Schedule 2 of the SEA Regulations.

## 10.2 Responding to the consultation

**10.2.1** This Regulation 18 SA Report will be published by Medway Council for consultation alongside the Medway Local Plan Regulation 18 2024 Consultation document. Consultation findings will be used to inform subsequent stages of the SA process.

**10.2.2** All responses on this consultation exercise should be made via Medway Council. The Council Planning Policy team can be contacted using the following information:

Planning Service,  
Medway Council,  
Gun Wharf,  
Dock Road,  
Chatham,  
ME4 4TR

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)

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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