Sustainability Appraisal of the Medway Local Plan

Regulation 19 SA Report

Volume 1 of 3: Non-technical summary

June 2025

LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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Sustainability Appraisal of the Medway Local Plan

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

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Front Cover: Aerial view of Rochester, Medway – Alexey Fedorenko (shutterstock)

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1 Introduction

The purpose of this report

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

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

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

The Medway Local Plan

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

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

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

What is Sustainability Appraisal and Strategic Environmental Assessment?

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

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

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

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

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

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

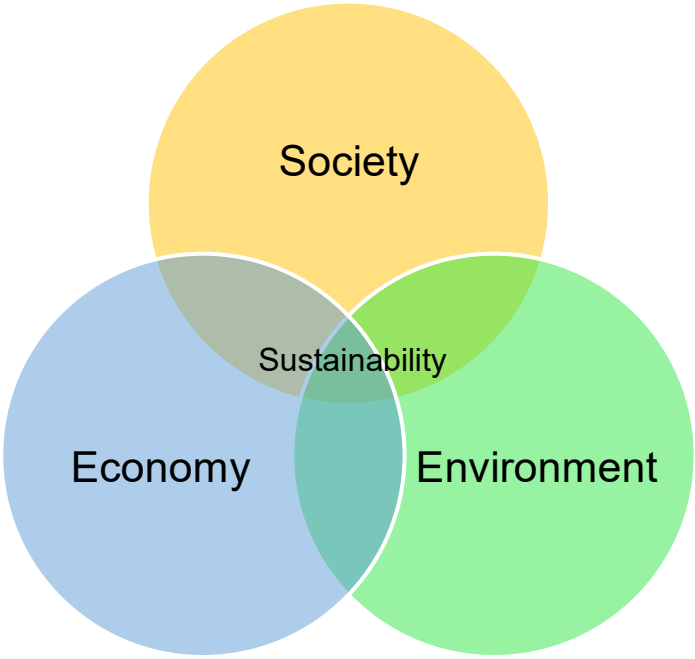

Figure N.1.1: *Sustainable development*

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

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

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

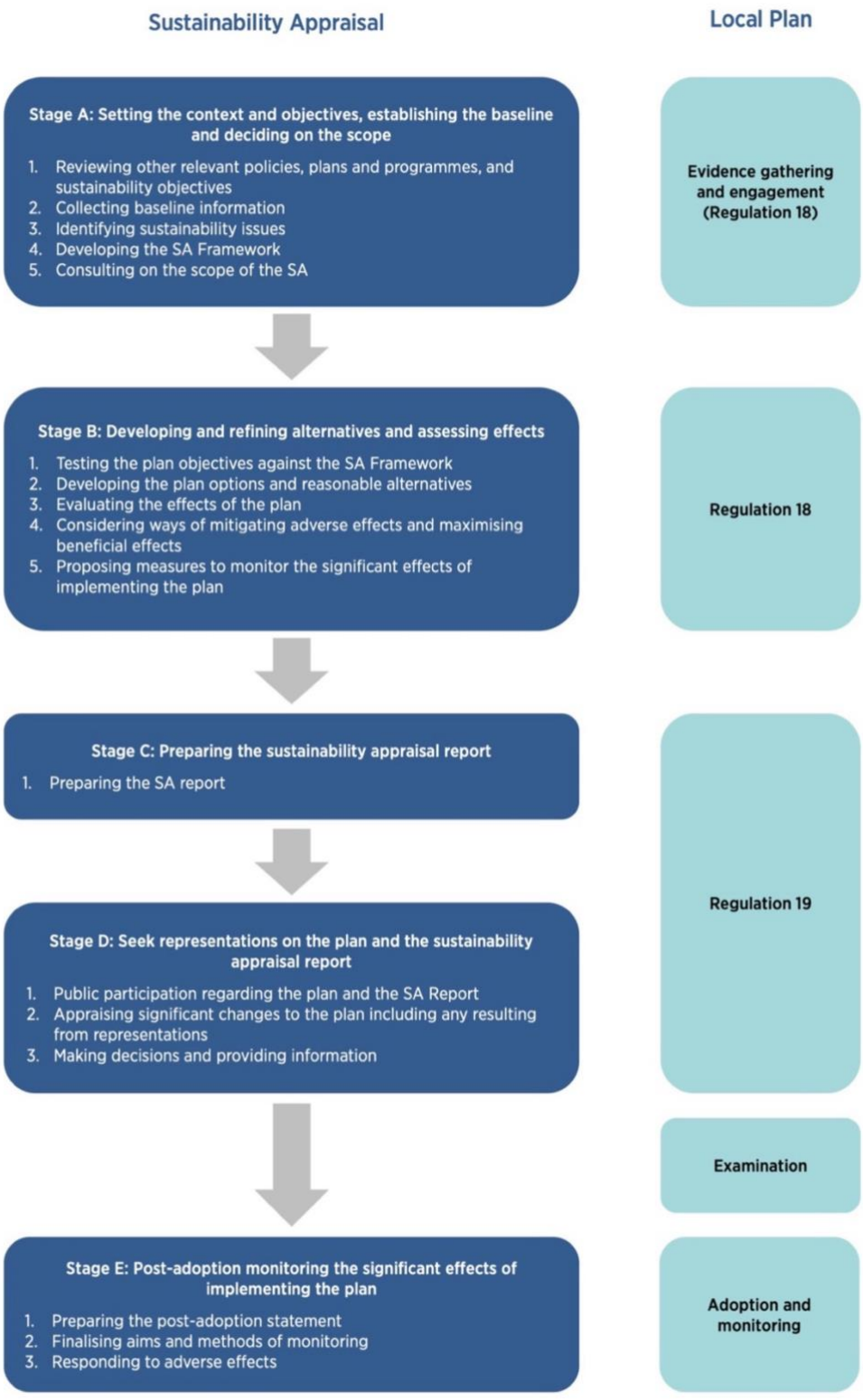

Figure N.1.2: *Sustainability Appraisal and the Local Plan process*

Medway Local Plan Area

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

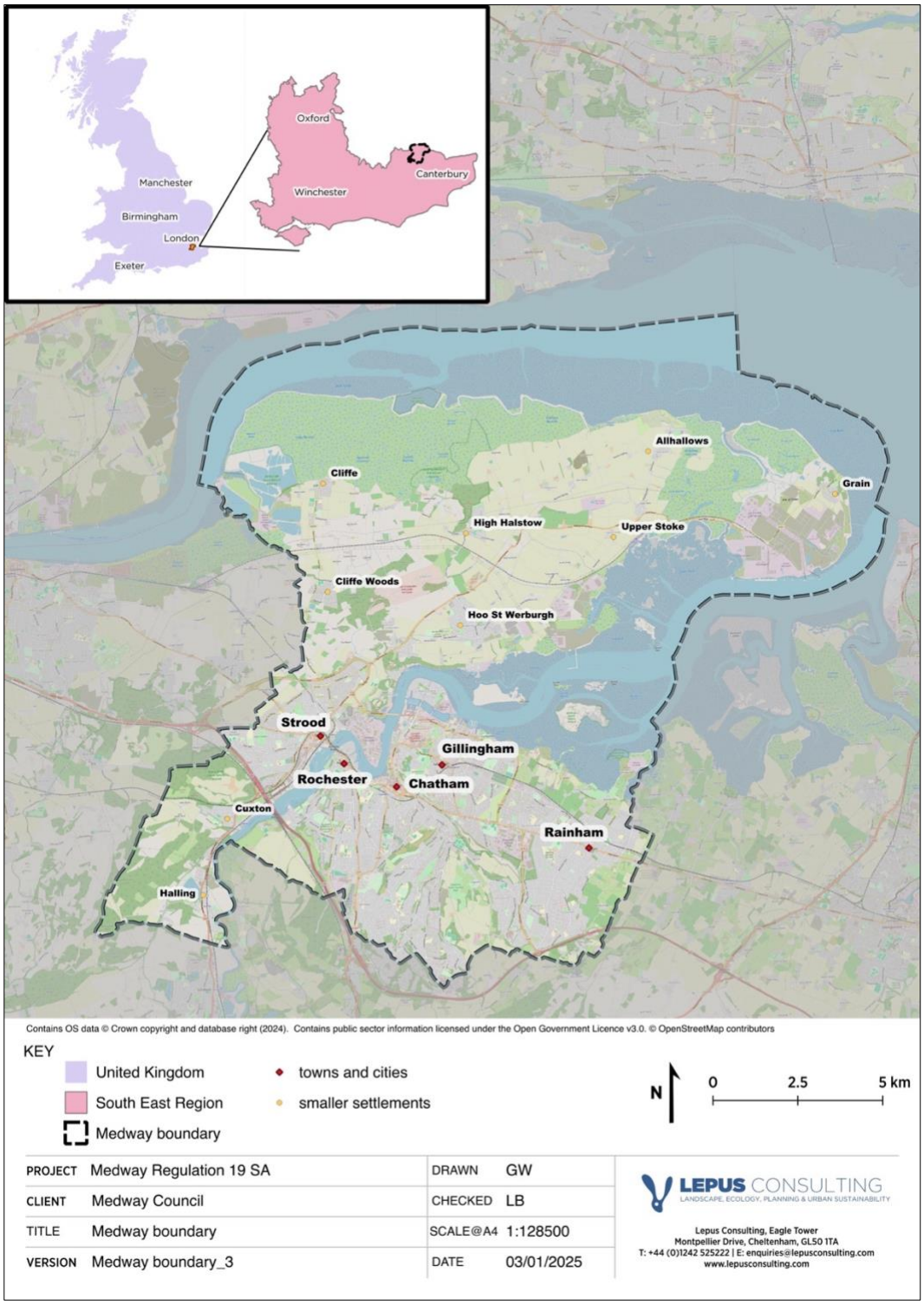

Figure N.1.3: *Medway Local Plan area*

The SA process alongside the Medway Local Plan

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

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

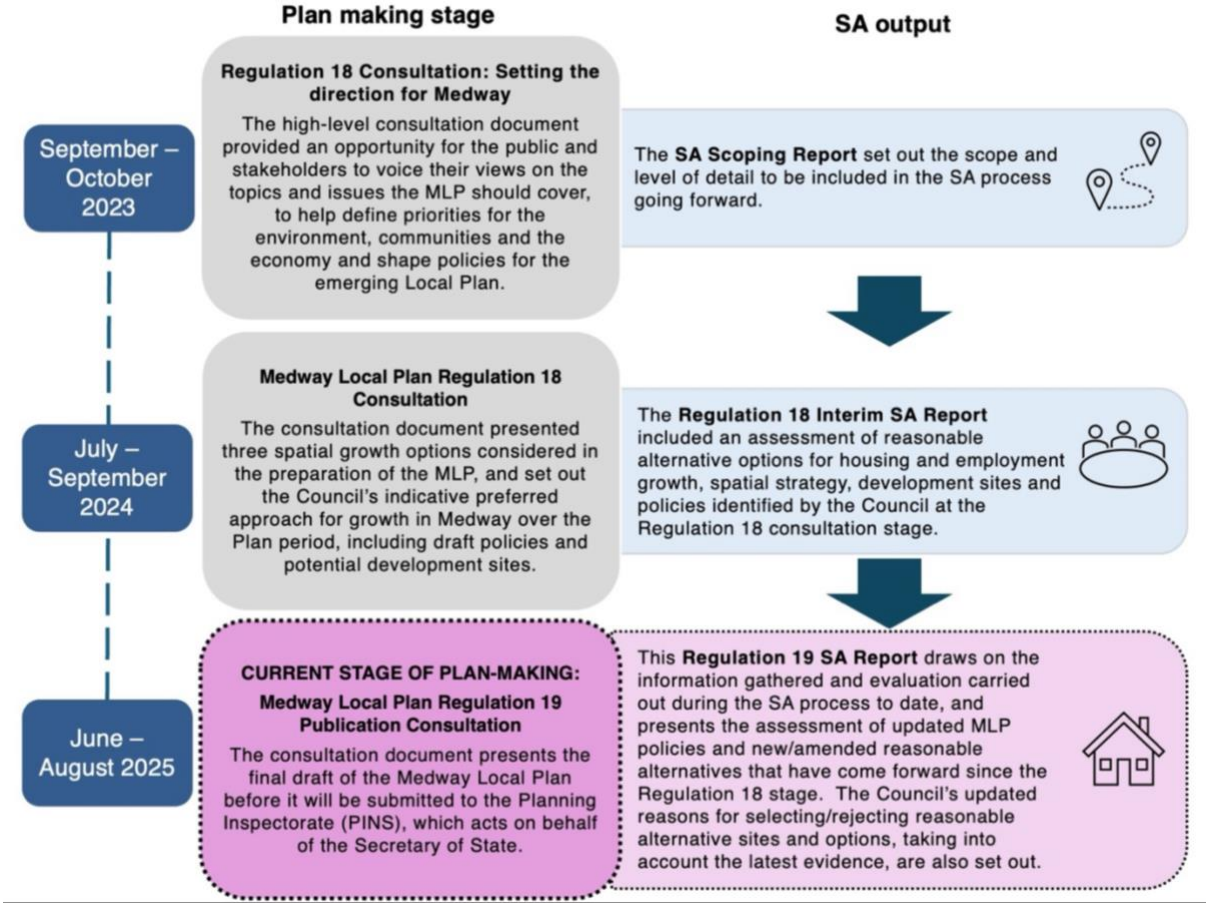

Figure N.1.4: *The MLP and SA process so far*

2 Purpose and content of the Regulation 19 SA Report

About the Regulation 19 SA Report

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

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

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

Structure of the Regulation 19 SA Report

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

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

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

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

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

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

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

3 Baseline and key sustainability issues for the MLP area

Overview

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

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

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

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

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

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

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

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

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

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

Theme	Key issues	Likely evolution without the MLP
	at several designations including the Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar, and North Downs Woodlands SAC.	
Climatic Factors	• Medway is a coastal authority and therefore at risk of flooding and sea level rise. • Increased number of vehicles on the road will exacerbate congestion, which is likely to be the major source of greenhouse gas emissions within Medway. • GI should be enhanced and expanded to maximise ecosystem services and climate resilience. • New development needs to incorporate energy efficiency measures and climate change adaptive features in order to respond to predicted levels of climate change.	• Carbon dioxide (CO_2) emissions in the transport sector may be likely to rise in line with local trends. An increasing uptake of electric vehicles, a trend seen across the UK, may help to alleviate these issues. • The risk of flooding will be likely to increase over time due to the changing climate, increasing the occurrence of extreme weather events. • The risk of surface water flooding will depend on the size, nature and extent of non-porous built surface cover in the future, and the effectiveness of the existing drainage system. • Total carbon emissions are expected to continue to decrease over the longer term as renewable energy becomes an increasingly competitive force in the UK energy market. • Technological advances, which may include renewable energies, electric vehicles, and efficient electricity supplies, will be expected to occur. • The lack of a planned growth strategy could lead to increased carbon emissions as development may be less likely to be in sustainable locations.
Cultural Heritage	• Medway's rich heritage is at threat of being compromised to meet housing demand. • There are numerous historic buildings that are listed. • Medway includes heritage assets identified as heritage at risk. • Archaeological remains, both seen, and unseen have the potential to be affected by new development areas.	• National and local guidance seeks to protect designated assets and their settings such as Listed Buildings, Conservation Areas, Scheduled Monuments, and Registered Parks and Gardens. • The Heritage at Risk Register will continue to be managed by Historic England who will continue to work with stakeholders to protect these assets. • Further heritage assets are likely to be identified in the future, with or without the MLP. • It is uncertain if connectivity with places, local distinctiveness and culture would be emphasised and protected in the absence of the MLP as it is anticipated that the MLP will require a Heritage Statement and/or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.
Human Health	• The increasing population in Medway will place pressure on the capacity of health infrastructure and leisure facilities without careful	• The population across Medway is expected to continue to increase. This is likely to place greater pressure on the capacity of key

Theme	Key issues	Likely evolution without the MLP
	planning and integration of new infrastructure, especially in light of Medway's existing high patient-to-GP ratio. • The life expectancy of men and women is anticipated to rise over time, in line with national trends, leading to a greater proportion of older residents with specific needs for housing and services. • Residents in Medway have a slightly higher than average proportion of overweight adults and lower average life expectancy in comparison to the South East average and national average.	services and amenities, including health and leisure facilities and housing. • The life expectancy of men and women is anticipated to rise over time, leading to an increasingly aging population. • Some residents will continue to need to travel relatively far, likely by driving, to reach important health facilities and services. • Dependent on behavioural patterns in society and the future policy approach to the concentration of late-night activities, the spatial patterns of higher crime in the town centres seem likely to continue. • There could potentially be a rise in homelessness due to an unmet housing need. • Noise pollution from Rochester Airport and existing and new main roads is likely to remain a long-term issue.
Landscape	• Development has the potential to impact on the Kent Downs National Landscape. • There is limited land available for development which places increasing pressure on natural assets due to the projected population increase. • Development should maintain important aspects of Medway's varied landscapes, including historic parks and gardens and areas of high landscape value. • Development should have regard to the findings of the published Landscape Character Assessment. • Change to and impacts upon the views from sensitive landscapes, local residents and the PRoW network. • Alterations to the urban/rural fringe and increased risk of coalescence between settlements. • Increasing demand for housing results in increased pressure on landscapes to accommodate new growth.	• The London Green Belt will continue to benefit from legislative protection. • The extent to which development will seek to conserve and enhance the character of local landscape and townscapes is uncertain. In the absence of MLP-led development, there could potentially be a rise in the quantity of new development which discords with the local character by altering the style and scale of development.
Population and Material Assets	• The increasing population within the Plan area will inevitably create more waste and pollution • It is important to ensure waste management accords with the waste hierarchy and reduces the overall quantity of waste	• The population of Medway is expected to continue to increase, which will be likely to result in secondary effects. Some of these secondary effects could include effects on health, education and social inequalities due to poorer accommodation and the potential for fewer sustainable travel choices being available.

Theme	Key issues	Likely evolution without the MLP
	• Waste facilities will need to be provided to cater for a growing population, prevent fly tipping and increase recycling rates • Need to provide suitable housing for a growing elderly population • Many pockets of economic/income deprivation, with some suffering severe, multiple deprivation • Public transport and sustainable travel options are less widespread in more rural areas of the Plan area. The distance and accessibility to key services and amenities, as well as employment opportunities, should be considered when determining where to locate new development. • Travel time and sustainable accessibility to educational facilities including primary schools, secondary schools and further/higher level educational facilities varies across the Plan area.	• Energy consumption in all sectors is expected to increase. • There will be less planning control over the location of future development sites, with potential for planning applications for new homes being allowed in unsustainable locations and/or without necessary supporting infrastructure. • There is the potential for the required infrastructure to support further growth not being delivered and for more dispersed patterns of development which could occur without a plan, both of which could increase the proportion of the population with poor access to services.
Soil	• The majority of land within the Plan area is high quality agricultural land including ALC Grade 1 which may be under threat from new development. • The development of sites could cause soil erosion and soil loss.	• Soil is a non-renewable resource that will be likely to continue to be lost. • Rates of soil erosion and loss of soil fertility will be likely to continue to rise due to the impacts of agriculture and climate change.
Water	• The Plan area contains SPZ1, SPZ2 and SPZ3 to the south of the Plan area, supporting groundwater resources, the quality and quantity of which should be conserved. • There are a number of important water resources and marine habitats within and around Medway which are sensitive to pollutants. • The River Medway is a valued asset that is underused. However, development and/or use of the river must not compromise the marine life and ecosystems. • Medway lies within an area of water stress, where there is a risk of drought with implications for both human and ecosystem health.	• Without the MLP, there could potentially be less control over the location and scale of new developments with potential to result in over-capacity issues at wastewater treatment works (either cumulatively or individually). • In the absence of MLP-led development, the efficiency and sustainability of water consumption may be unlikely to improve owing to the likely increase in population and associated water demand, depending on the nature of any future changes to national regulations, such as the Building Regulations and any emerging policy / regulations relating to water neutrality. • Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the Thames and south east RBMPs, WRMP and CAMS in line with the EU Water Framework Directive.

4 SA methodology

The SA Framework

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

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

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

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

Significant effects

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

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

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

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

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

5 Reasonable alternatives

Preface

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

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

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

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

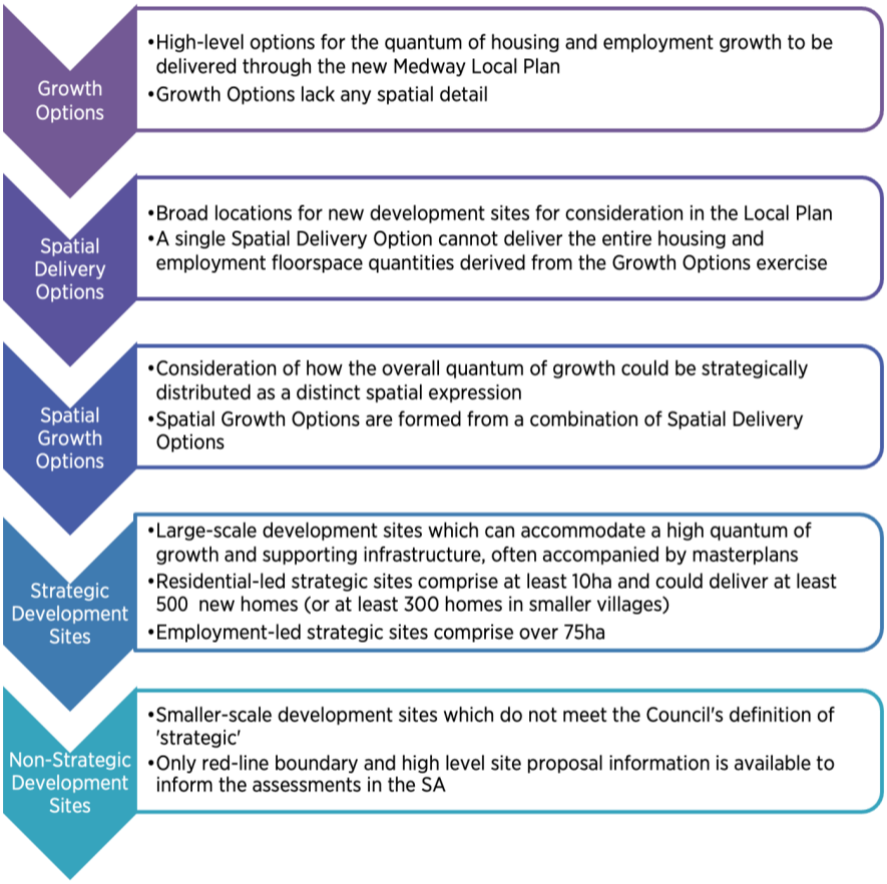

Figure N.5.1: *Definitions for the different types of reasonable alternatives assessed in the SA process*

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

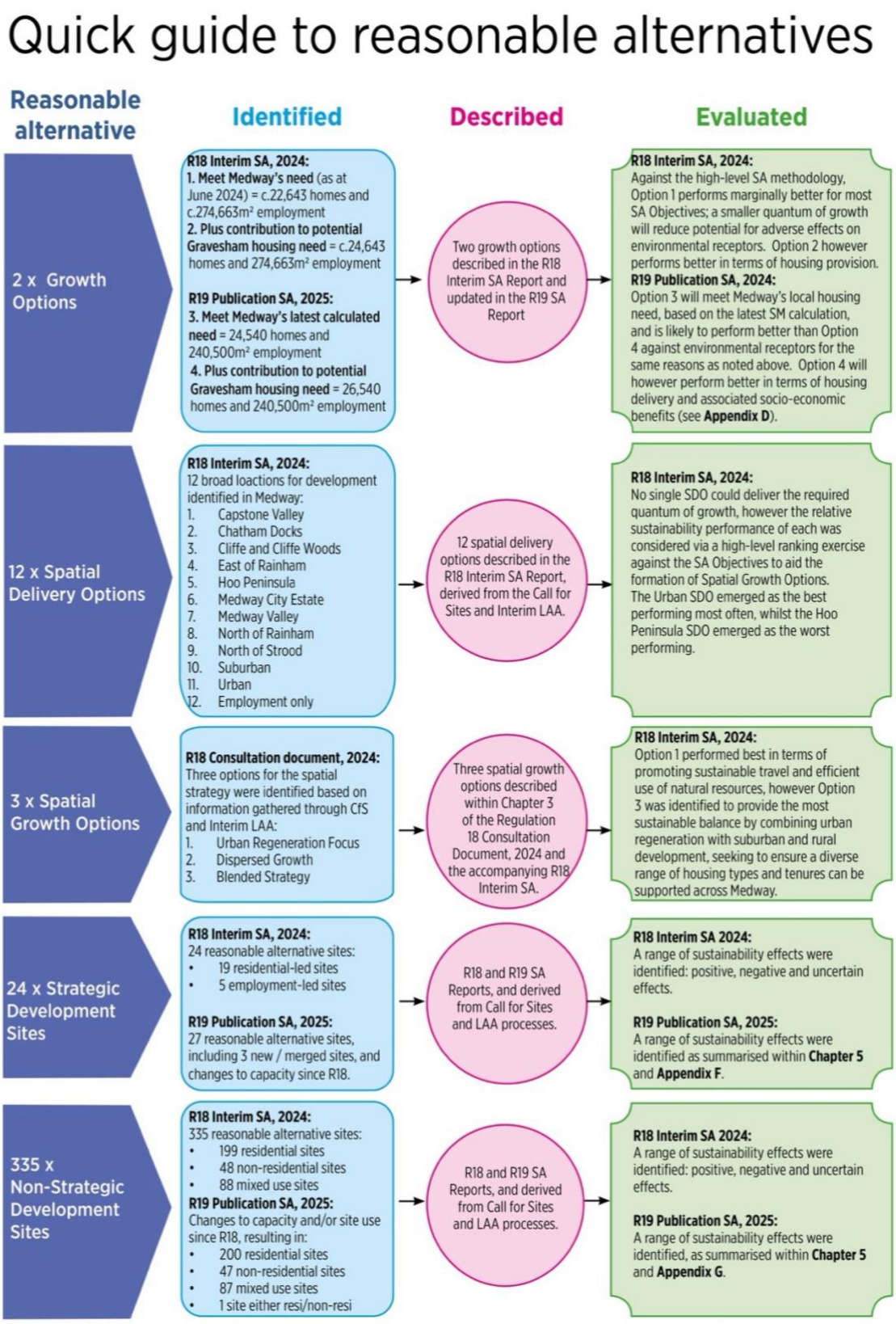

Figure N.5.2: *The identification, description and evaluation of reasonable alternatives considered at different stages during the plan-making process for the MLP*

Growth options

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

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

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

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

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

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

N39. The Regulation 18 consultation closed in September 2024. A new version of the NPPF was published in December 2024, alongside updated PPG. New housing figures were published, derived through the Standard Method, that sought to meet the government's aspirational target of building 1.5 million homes during this parliamentary term.

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

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

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

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

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

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

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

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

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

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

Spatial delivery options

N42. Drawing on information gathered through Call for Sites exercises and the Interim Land Availability Assessment (LAA)[12] and sites promoted in response to the previous Regulation 18 consultation (2023), 12 'spatial delivery options' (SDOs) were identified by the Council. The 12 SDOs were assessed within Appendix B of the Regulation 18 (2024) Interim SA Report[13].

N43. The SDOs were based on broad locations across Medway, apart from one which comprises sites for employment land uses only. The broad locations which form the SDOs

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

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

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

cover a range of land use types, which could provide a mixture of sites including greenfield and rural development as well as opportunities for regeneration of brownfield land, in order to explore the relative benefits and challenges associated with growth in these areas across Medway.

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

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

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

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

N46. A combination of SDOs would be needed to form a spatial strategy and ensure a sustainable level of growth across Medway as a whole. Drawing on the assessment narrative and relative sustainability performance of the 12 SDOs against each SA Objective, the Urban SDO emerged as the best performing option the most often. The Suburban SDO and Chatham Docks SDO also performed relatively well, each ranking 1st against two SA Objectives. The worst performing SDO is the Hoo Peninsula, ranking the lowest against a number of SA Objectives, with potential adverse effects associated with the introduction of a large quantum of growth in small settlements and in proximity to sensitive ecological receptors.

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

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

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

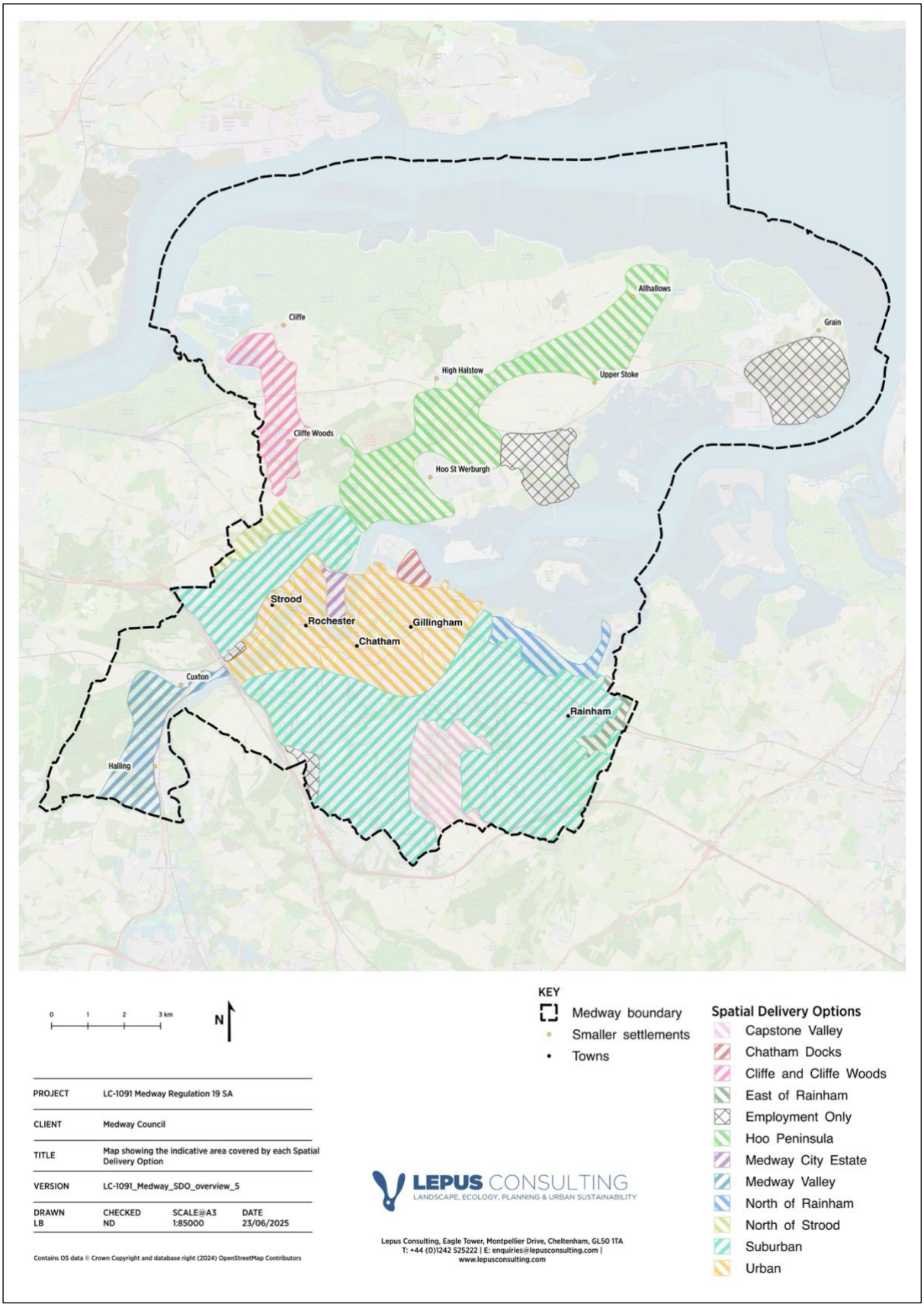

Figure N.5.3: *Map showing the indicative broad areas covered by each Spatial Delivery Option*

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

Spatial growth options

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

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

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

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

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

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

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

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

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

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

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

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

Comment from Council:

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

Reasonable alternative sites

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

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

Strategic employment-led sites are considered to be those which comprise over 75ha. At the Regulation 18 stage, 24 reasonable alternative strategic sites were identified, and 335 non-strategic sites.

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

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

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

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

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

N57. All reasonable alternative sites are evaluated using the same methodology. However, 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, in contrast to the non-strategic sites where this level of detail is not available on a comparable basis.

N58. **Figure N.5.4** shows how a range of positive and adverse effects were likely to arise from the different reasonable alternative sites, prior to the consideration of the mitigation hierarchy.

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

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

Post-mitigation assessments of reasonable alternative sites

N59. Mitigation, using the emerging MLP policies (see **Appendix H** for the SA evaluation of policies), has been applied to the SA results for each reasonable alternative site and presented in **Appendix I**.

N60. Following the application of policy mitigation, it was identified that many of the pre-mitigation adverse effects will likely be reduced or mitigated.

N61. The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is the Council's role to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the MLP and which to 'reject' from further consideration.

N62. **Appendix J** sets out the sets out the outline reasons for selection and rejection of each reasonable alternative site considered throughout the SA process, provided by Medway Council.

6 The preferred approach

MLP Policies

N63. Following comments received during the Regulation 18 consultations and recommendations set out in the SA reports, Medway Council have prepared the Regulation 19 Publication Version of the MLP.

N64. The MLP includes chapters which set out the overarching vision, spatial strategy and 88 strategic, thematic and development management (DM) policies. The MLP also contains 14 site allocation policies, discussed below.

N65. **Table N.5.1** below presents a summary of the assessment of 88 strategic, thematic and DM policies (see full details in **Appendix H**). These policies are generally anticipated to have positive impacts on the SA Objectives, with adverse effects associated predominantly with pollution and waste, climate change mitigation and some for biodiversity and health. Uncertainty has been identified where site-specific contextual information is lacking which could positively or adversely impact the chosen SA Objective.

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

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

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

	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
DM20	+	0	0	+/-	+	0	0	+	0	+	+	+
T27	+	0	0	0	0	0	0	++	0	+	0	0
T28	+	+	+	+	0	0	0	++	0	0	0	0
DM21	+	+	+	+	+	0	0	++	0	+	0	0
T29	+	0	0	0	0	0	0	+	+	+	0	0
S24	+	+	0	++	+	0	0	++	0	++	++	+
DM22	+	0	0	0	+	0	0	0	0	+	+	++
T30	0	0	0	0	0	++	+/-	0	0	0	0	+
T31	0	0	0	0	0	+	+/-	0	0	0	0	+
T32	+	0	-	+	+	+	0	-	+/-	+	0	+
T33	+	0	-	-	-	++	0	-	+/-	+	0	+
DM23	+	0	0	0	++	+	0	0	0	0	0	0
T34	0	0	0	0	+	0	0	0	0	0	0	0
T35	+/-	-	-	-	++	-	0	-	-	-	0	0
T36	0	0	0	0	+	+/-	0	0	0	0	0	0
T37	+	+/-	+/-	+/-	+	+/-	0	+/-	+/-	+/-	0	0
T38	+/-	+/-	+/-	0	+	+/-	0	+/-	+/-	+/-	0	0
T39	+/-	0	0	+	+	+	0	0	+	+/-	0	0
T40	0	0	0	0	+	0	0	0	0	0	0	0
S25	++	--	--	-	+/-	-	0	+/-	-	-	+	++
T41	+	0	0	0	0	0	0	+	0	0	0	0

Site allocations

N66. The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is the role of the Council to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the MLP and which to 'reject' from further consideration (see **Appendix J** for more details).

N67. A total of 131 sites have been selected for allocation in the MLP by Medway Council. This includes 12 'strategic' sites and 119 'non-strategic' sites.

N68. These sites will collectively result in the delivery of 21,194 homes to meet identified needs (in combination with 1,762 pipeline sites and 1,584 windfall sites) and sufficient land for a portfolio of employment sites that meet the needs of different types of businesses to meet the identified employment land needs (204,000m^2 industrial and 36,500m^2 office space, plus account for lack of building stock identified in the ELNA).

N69. As discussed in **Chapter N.5**, all reasonable alternative sites were evaluated in the SA process pre-mitigation (see **Appendix F** for strategic sites and **Appendix G** for non-strategic sites) and post-mitigation (see **Appendix I**). The SA findings were fed back to the Council on an iterative basis to assist in decision-making regarding the selection or rejection of each site within the emerging MLP.

Site allocation policies

N70. In addition to the 88 strategic, thematic and DM policies as outlined above, Medway Council has prepared 14 site allocation policies. Each policy relates to a number of site allocations that have been proposed for inclusion in the MLP, grouped by geographic area.

N71. Each site allocation policy has been evaluated in **Appendix K**, drawing on the post-mitigation site assessments as presented in **Appendix I**. The assessment considers the extent to which the provisions of the 14 site allocation policies will further improve sustainability of these sites, compared to the post-mitigation assessment findings.

N72. The assessment findings are summarised in **Table N.6.2**. The majority of site policies will ensure sustainable access to schools, healthcare, jobs and local services are improved (SA Objectives 8, 10, 11, 12). The policies will ensure that, particularly in the urban areas, opportunities are sought for heritage-led development and regeneration to conserve and enhance the landscape/townscape and historic environment (SA Objective 4 and 9). The majority of sites lie in Flood Zone 1 where fluvial flood risk is low and climate change adaptation measures can be secured via careful integration of GI (SA Objective 2).

N73. However, potential adverse impacts have been identified in relation to the loss of high-quality agricultural land (SA Objective 6), alteration of rural landscape character (SA Objective 4), and the generation of pollution associated with new development (SA Objective 5). For more rurally located sites, minor negative effects have been identified in relation to transport and access to healthcare (SA Objectives 8 and 10). Some allocations lie within Flood Zones 2 and/or 3, where site-specific flood risk assessments will be required to confirm the potential for mitigation (SA Objective 2).

N74. Uncertainty remains in the assessment against climate change mitigation (SA Objective 1) where there is potential for both positive and adverse effects on greenhouse gas (GHG) emissions associated with the scale of development proposed alongside encouragement for minimising embodied emissions and supporting sustainable energy infrastructure. Additionally, the impacts of all allocations on biodiversity are uncertain at the time of writing, in the absence of the HRA conclusions (SA Objective 3). For all policies, the potential impacts on Medway's constrained transport network will need to be carefully considered in light of the findings of the emerging Strategic Transport Assessment.

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

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

7 Likely significant effects on the environment

Identified impacts, mitigation and residual effects

N75. Proposals in the MLP have been assessed for their sustainability impacts, the results of which are presented in the relevant appendices and/or report chapters as described in the above NTS chapters. The assessment of the MLP, including reasonable alternatives, was undertaken using a combination of available evidence and professional judgement.

N76. **Table N.7.1** provides an overview of the evaluation of the MLP against the SEA topics as provided in the main Regulation 19 SA Report.

N77. The second column of **Table N.7.1** provides a summary of the potential negative impacts of the MLP relating to each of the sustainability themes (as set out in full within **Chapters 7-15** of the main SA Report, **Volume 2**). These are impacts that have been identified prior to the implementation of MLP mitigation.

N78. Column three of **Table N.7.1** summarises the effects of the MLP policies which are expected to mitigate or help to reduce some of the potentially negative impacts.

N79. In some cases, the MLP policies are likely to fully mitigate identified effects or lead to longer term benefits. The MLP policies, however, are not anticipated to fully mitigate all of the identified effects. The residual effects are identified and drawn to the attention of the plan makers and summarised in the final column of **Table N.7.1**.

Cumulative effects

N80. The Cumulative Effects Assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the Local Plan and assessed alongside known existing underlying trends and other PPPs.

N81. Cumulative effects are different from effects that occur alone. Alone, the Plan may not result in residual adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.

N82. Cumulative effects of the MLP are discussed in **Table N.7.1** alongside the identified residual effects, with the full CEA provided in **Chapter 16** of the main Regulation 19 SA Report.

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

Sustainability theme	Potential impacts of the MLP	Mitigating MLP policies	Summary of residual effects
 **AIR**	• **Increased generation of, and exposure to, air pollution**, such as NO_2 and particulate matter, from the construction and occupation of new development and associated traffic. Increased pollutant levels can affect respiratory health and lead to adverse effects on vulnerable habitats.	• Policy **DM3 (Air quality)** promotes design to improve emissions, such as electric charging points and low NO_2 boilers. Development which may negatively impact air quality will provide an air pollution impact assessment with mitigation measures, including development in proximity to an AQMA or biodiversity designation. • **The Spatial Development Strategy**, Policy **T26 (Accessibility standards)** and **Policy DM20 (Cycle parking and storage)** aim to reduce reliance on cars and need to travel by facilitating sustainable and active transport. • Policy **S5 (Securing strong green and blue infrastructure),** Policy **T27 (Reducing health inequalities and promoting health and wellbeing),** and Policy **DM6 (Sustainable design and construction)** all support provision of infrastructure that reduces air pollution. • Site Policy **SA1 (Chatham Town Centre and Surrounds)** will ensure air quality in Central Medway AQMA is addressed through the proposal design.	• Despite technological and infrastructure advancements, the proposed development of new homes and employment sites are expected to increase traffic volume and energy demand. Increased pollutant emissions, particularly NO_2 and PM_{10}, cannot be fully mitigated by MLP policies alone. The transition to clean technologies will continue over the coming years. **The long-term effect on emissions and air quality is likely positive, but short-term cumulative negative effects are expected.**

Sustainability theme	Potential impacts of the MLP	Mitigating MLP policies	Summary of residual effects
 **BIODIVERSITY, FLORA & FAUNA**	• **Threats or pressures to European sites** including Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar, and North Kent Downs Woodlands SAC (see the HRA[19] for more details). • **Threats or pressures to nationally or locally designated and non-statutory biodiversity sites**, including from recreational disturbance or increased water/air pollution from visitors to the sites. • **Fragmentation of the ecological network** including priority habitats.	• **Policy S2 (Conservation and enhancement of the natural environment) requires** development proposals to strengthen biodiversity networks and ensure effective mitigation in sensitive locations, including European sites. It promotes conservation, restoration, and enhancement of the Marine Conservation Zone (MCZ), Sites of Special Scientific Interest (SSSI), National and Local Nature Reserves (NNR and LNR), Local Wildlife Sites (LWS), and ancient woodlands. National requirements mean development proposals must also provide measurable net gain of 10% Biodiversity Net Gain. • **Policy S3 (North Kent Estuary and Marshes designated sites)** requires residential development within the 6km ZOI to contribute to the North Kent SAMMS, and that larger sites beyond the ZOI may need mitigation to offset adverse recreational effects. • Policy **S5 (Securing strong green and blue infrastructure)** encourages the use of GI to provide protection for European, nationally designated, locally designated, and non-statutory biodiversity sites. • Policy **T1 (Promoting high quality design)** protects existing trees and aims to establish new landscape features that promote biodiversity.	• At the time of writing, the HRA process has not been able to reach a conclusion regarding air quality and recreational impacts on the SPA and Ramsar sites. Further air quality modelling work and a final Hoo Peninsula Strategic Environmental Programme will be evaluated to inform the final HRA. **The effect of the MLP on European sites is currently uncertain.** • While most identified impacts on national and local designations will be mitigated, adverse effects remain possible where a small number of sites lie coincident with or directly adjacent to SSSI, LNR and LWS, or within 400m of Chattenden Woods and Lodge Hill SSSI that supports nationally important Nightingales. Consultation with Natural England is recommended to inform necessary mitigation. **A potential long-term significant adverse effect on nationally and locally designated biodiversity sites is identified.** • The MLP policies aim to enhance habitat connectivity and strengthen the resilience of ecological and GI networks against current and future pressure. They support the conservation and expansion of GI and habitats, in line with the Kent and Medway LNRS. **A long-term positive impact on GI opportunities is anticipated**.

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

Sustainability theme	Potential impacts of the MLP	Mitigating MLP policies	Summary of residual effects
 **CLIMATIC FACTORS**	• Some new development is located in areas of higher **fluvial and surface water flood risk** where there may be increased risks to human health or damage to properties, or in areas where development could **reduce future viability of flood defences**. • Increased **GHG emissions** due to the construction and occupation of new development and associated traffic. • **Loss of multi-functional green infrastructure** that may reduce resilience to climate change.	• Policy **DM1 (Flood and water management)** aims to minimise flood risk through site-specific flood risk assessments, application of the Sequential and Exception tests, and providing flood management infrastructure. This includes locating development in low-risk areas, supporting the Environment Agency's flood management program, and implementing Surface Water Drainage Strategies like Sustainable Drainage Systems (SuDS) to replicate greenfield runoff rates. Development that harms or obstructs flood defences will not be permitted unless adequately mitigated, including ongoing inspection, maintenance, and repair of existing defences. • Policy **S1 (Planning for climate change**) ensures development proposals will include opportunities for adaptation to, and mitigation of, climate change to progress towards achieving net zero carbon in Medway by 2050. The policy promotes effective spatial planning, use of renewable and low carbon technologies and design, delivery of GI, and flood risk management. These criteria are underpinned by Policy **DM3 (Air quality)**, Policy **DM6 (Sustainable design and construction)**, Policy **S25 (Energy supply)** and Policy **T41 (Heat networks)**. • Policy **S5 (Securing strong green and blue infrastructure)** encourages use of GI to manage surface water flood risk and adapt to the impacts of climate change, helping to conserve and enhance the GI network in Medway. This includes the implementation and management of SuDS. • Site Policy **SA4 (River Waterfront)** requires flood mitigation and/or a flood defence wall in north Gillingham and Site Policy **SA13 (Frindsbury Peninsula Opportunity Area)** highlights the delivery of strategic flood risk infrastructure.	• The Level 2 SFRA[20] explains how the Sequential Test and Exception Test have been applied and includes a summary of required actions to ensure that development will be safe and consistent with national policy. The MLP policies are expected to protect future and existing flood defences from development in line with adopted strategies. **Subject to achieving the recommendations set out in the SFRA, it is likely that the MLP will have a negligible effect on flooding.** • Although relevant MLP policies may help to reduce GHG emissions, particularly with energy efficient design and low carbon sources, they may not fully mitigate the impacts of the large growth expected from the Plan. **An increase in GHG emissions as a consequence of the proposed development is expected to be a cumulative adverse effect, but potentially medium-term pending effective implementation of net-zero commitments.** • Despite some loss of previously undeveloped land associated with development sites, the MLP policies seek to conserve and enhance multi-functional green and glue infrastructure across the Plan area. **Supporting GI delivery throughout the Plan area means a positive effect on Medway's climate change adaptation is expected.**

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

Sustainability theme	Potential impacts of the MLP	Mitigating MLP policies	Summary of residual effects
 **CULTURAL HERITAGE**	• The introduction of new development may lead to **changes in the character and/or setting of designated heritage assets (including Registered Parks and Gardens (RPG), Scheduled Monuments (SM) and Listed Buildings).** • New development may also lead to adverse **effects on historic character, including the character or setting of Conservation Areas (CA).**	• Policy **S8 (Historic environment)** supports development that "*positively contributes to local distinctiveness and character*", and "*preserves or enhances the significance of designated and non-designated heritage assets and their settings*". This includes making sensitive and sustainable reuse of heritage assets, especially those 'at risk'. • Policy **S9 (Star Hill to Sun Pier)** focuses on conserving and enhancing assets within the identified Heritage Action Zone (HAZ). • Policy **DM9 (Heritage assets)** promotes high quality design that seeks to enhance the significance and setting of heritage assets. A Heritage Statement will be required for development in proximity to heritage assets. • Policy **DM10 (Conservation areas)** only permits development within a CA where it *"contributes positively to the conservation and enhancement of the character, appearance and distinctiveness of the area".* • Policy **DM11 (Scheduled monuments and archaeological sites)** does not permit development which adversely impacts SMs or their setting. • Policy **T1 (Promoting high quality design)** encourages developments which respond to the character and appearance of their settings. • Site Policy **SA5 (Strood District Centre and Surrounds)** ensures development sensitively addresses Rochester Castle and its setting.	• Adverse impacts on the character and setting of designated heritage assets and their settings are anticipated to be mitigated through various MLP policies. A range of plans, programmes and legislation, including the NPPF and local guidance allow protection of heritage assets in line with their significance. **The MLP will be expected to help avoid or mitigate potential significant impacts on designated heritage assets arising from proposed development, with a negligible effect identified overall.** • Adverse impacts on the character and setting of CAs are anticipated to be mitigated through various MLP policies. **The MLP will be expected to help avoid or mitigate the potential for significant impacts on CAs arising from proposed development. Effective design policies such as T1, S8 and DM9 are likely to deliver longer-term positive effects for the urban realm and wider historic character.**

Sustainability theme	Potential impacts of the MLP	Mitigating MLP policies	Summary of residual effects
 **HUMAN HEALTH**	• A small number of allocations are situated in areas with **limited sustainable access to healthcare facilities.** • **Exposure to air/noise pollution** (from AQMAs/main roads) with implications for health. • **Loss of public greenspace** where some allocations coincide with current open spaces. • A small proportion of allocated sites are located in areas with more **limited access to PRoW and/or cycle network**.	• Various policies including **DM15, T4, T5, T10, T27, S14** and **S15** all encourage improved public transport provision and accessibility, which is likely to improve access to healthcare facilities. • Various site allocation policies include provision of new healthcare hubs, open space and sports facilities, and improved cycle and pedestrian routes, including the Gillingham Greenway within Site Policy **SA4 (River Waterfront)**. • Policy **T27 (Reducing health inequalities and promoting health and wellbeing)** aims to improve sustainable access to health and wellbeing facilities, reduce health inequalities, and requiring Health Impact Assessments for specific development proposals. It also aims to increase accessibility to recreational opportunities such as greenspaces. A way of doing this is encouraging improvements to walking, wheelchair, and cycling routes. • Policy **T28 (Existing open space, outdoor sports and play spaces)** and **Policy DM21 (New open space, outdoor sports and play spaces)** encourage adequate open space and greenspace provision, including replacement of losses of open space or greenspace. • Policy **T26 (Accessibility standards)** and Policy **DM20 (Cycle parking and storage)** aim to reduce reliance on cars and travel needs through facilitating sustainable and active modes of transport. • Policy **DM3 (Air quality)** addresses air quality issues across Medway and promotes appropriate design to improve emissions, such as through the installation of electric charging points and low NO_2 boilers.	• MLP policies will help prevent loss of existing healthcare facilities and improve sustainable access to facilities. However, restricted access to healthcare services is likely for sites in more isolated settlements. **Limited sustainable access to healthcare facilities is expected to be a medium-term and temporary significant adverse effect.** • Several MLP policies aim to reduce air pollution impacts on human health. However, increased traffic flows and reduced air quality, especially in AQMAs, are likely outcomes that cannot be fully mitigated. **Adverse effects on health as a result of poor air quality is expected to be a long-term significant effect, although the impact may lessen over time as clean technologies improve.** • The MLP policies will ensure no net loss of public greenspace. **Positive impacts on access to greenspace could be achieved in the longer term, through the provision of on-site or off-site GI provisions.** • Various MLP policies seek to create permeable neighbourhoods and promote cycling and walking, improving the coverage of, and accessibility to, active travel networks. **An overall positive effect would be likely with regard to pedestrian and cycle access.**

Sustainability theme	Potential impacts of the MLP	Mitigating MLP policies	Summary of residual effects
 **LANDSCAPE**	• **Threats or pressures to the National Landscape** (NL) and its setting. • **Alteration of landscape character** and sensitive or locally distinctive landscapes. • New development may lead to **changes in views** experienced by local residents or users of the PRoW network. • Increased risk of **urban sprawl and coalescence between settlements** owing to development on greenfield land.	• Policy **S4 (Landscape protection and enhancement)** requires development proposals to demonstrate their response to key sensitivities and qualities of the surrounding landscape, including the Kent Downs NL. It also requires conservation and enhancement of Medway's local landscape character and distinctiveness, such as North Kent Marshes. • Policy **S5 (Securing strong green and blue infrastructure)** encourages development to reflect local character by providing multi-functional GI. • Policy **S6 (Kent Downs National Landscape)** seeks to ensure developments within or in the setting of the NL conserve and enhance its character. • Policy **T1 (High Quality Design and Amenity)** will ensure development is appropriate to its surroundings and informed by Landscape and Visual Impact Assessment. It also seeks to retain urban/rural distinctiveness through containing settlements to avoid coalescence. • The **Spatial Development Strategy** encourages retention of separation between urban Medway and the Hoo Peninsula through green corridors between the areas. • Site Policy **SA1 (Chatham Town Centre and Surrounds)** and **SA5 (Strood District Centre and Surrounds)** require views analysis to inform development. • Site Policy **SA8 (Hoo St Werburgh and Chattenden)** requires a strategic landscape corridor to separate of Hoo and Chattenden and Site Policy **SA9 (High Halstow)** avoids coalescence with nearby settlements using landscape buffers.	• The MLP will be expected to avoid/mitigate the potential for significant impacts on the Kent Downs NL, in line with national planning policy and guidance, although **uncertainty remains in regard to the impact of allocations in the Capstone Valley on the setting of the NL in absence of specific landscape sensitivity / capacity assessments covering this area.** • Due to the large proportion of development in greenfield locations, the policies are not expected to fully mitigate impacts on landscape character. **Alteration of landscape character is a long-term, permanent, significant effect. There is potential for a cumulative adverse effect on landscape character resulting from the proposed development.** • While the MLP policies provide some protection for visual amenity and views, a residual impact will likely remain due to the large proportion of development being proposed on greenfield sites. **Alteration of views is likely to be a long-term, but minor, adverse effect.** • While MLP policies will reduce impacts on the countryside and maintain separation between settlements, the rural context of some settlements is likely to be altered. **An increased risk of urbanisation of the countryside and coalescence is a long-term and permanent significant adverse effect.**

Sustainability theme	Potential impacts of the MLP	Mitigating MLP policies	Summary of residual effects
 **POPULATION & MATERIAL ASSETS**	• The MLP needs to ensure the **provision of housing and employment opportunities** to meet local need. • A small number of allocations are situated in areas with limited **sustainable access to services and facilities.** • Increased **pressure on local services** from new development. • Some development is located in deprived areas where there are **inequalities to be addressed.** • Increased **waste generation** due to new development. • Potential **sterilisation of mineral resources** where non-minerals development lies within Mineral Safeguarding Areas (MSA).	• Policy **T2 (Housing mix)** and **T3 (Affordable housing)** aim to ensure that the identified local housing needs are met, supporting the current and future requirements of the population in terms of housing type and size, including affordable homes and specialist accommodation. • Policy **T30 (Safeguarding mineral resources)** allows development only where it would not intervene with current/potential mineral extraction, and **T31 (Safeguarding of existing mineral supply infrastructure)** protects infrastructure from development that may limit their operation. • Policies **T34 (Safeguarding existing waste management facilities)** and **T35 (Provision of additional waste management capacity)** will maintain and increase waste management capacity, and **DM23 (Waste prevention)** encourages design principles that minimise waste and use locally produced and recycled resources. • Policies including **DM15, T4, T5, T10, T27, S16** and **S17** encourage development in areas accessible to public transport and support co-location of services. Policy **T26** requires all proposals to be accessible to a secondary school or social space via a 15-minute bus journey. Travel plans will be required for development generating a significant amount of movement under Policy **DM18.** • Site Policy **SA14 (Employment Sites)** sets out a range of employment land uses and floorspace to be delivered within the Plan period including 324,450m^2 at MedwayOne (former Kingsnorth Power Station). • Policy **S10 (Economic strategy)** will improve Medway's range of employment sites, likely compensating for any loss of employment floorspace.	• In order to meet the identified housing need, the MLP proposes 21,194 new dwellings of an appropriate mix of types and tenures, as well as sufficient land for employment sites that meets the needs of different types of businesses. **A positive effect on housing and economic provision is anticipated.** • The MLP policies will improve access to local services and facilities for most sites through improved transport networks, developer contributions to services, and new service provision. However, access could remain limited within some rural sites, although Travel Plans will potentially address this. **A residual negligible effect is identified for access to local services.** • The Waste Needs Assessment (WNA)[21] found sufficient capacity for recycling, composting, and inert waste, but a landfill shortfall for non-inert waste. New development could cumulatively increase non-inert waste production. **The cumulative impact of increased waste generation on the capacity of waste management facilities is likely to be a medium-term, but potentially temporary, significant adverse effect.** • The MLP policies are expected to ensure that potential impact on safeguarded minerals is avoided or minimised. **A minor positive effect on mineral resource conservation will be expected.**

Sustainability theme	Potential impacts of the MLP	Mitigating MLP policies	Summary of residual effects
 **SOIL**	• Direct **loss of soil resources** due to construction of new development which contains previously undeveloped land. The MLP could result in the loss of up to c.1,110ha of previously undeveloped land, of which c.980ha is potential BMV land[22].	• The **Spatial Development Strategy** encourages development proposals to make use of previously developed land, locating development away from greenfield land with high value soil. • Policy **S4** (Landscape protection and enhancement) aims to provide local nature recovery networks and improve habitat connectivity, consequently areas of BMV soil. • Policy **S5** (Securing strong green and blue infrastructure) will help conserve and enhance Medway's GI network, including BMV soil. • Policy **T14** (Rural economy) supports employment development in the countryside that does not lead to significant loss of high-grade agricultural land and can demonstrate that locations of lower agricultural land values are not suitable.	• The proposed allocations would cumulatively result in the loss of a significant amount of previously undeveloped land. The loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality and agricultural yield. Therefore, a residual adverse effect will be expected. **The loss of previously undeveloped land, a large proportion of which could include BMV land, is expected to be a long-term and permanent significant adverse effect.**

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

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

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

Sustainability theme	Potential impacts of the MLP	Mitigating MLP policies	Summary of residual effects
 **WATER**	• **Reduction in water quality** and ecosystem services due to increased run-off of pollutants. • Increased **demand for water and wastewater management** due to new development.	• Policy **DM1 (Flood and water management)** promotes efficient water usage and will ensure that adequate wastewater infrastructure is provided for new development. Development will be required to be in accordance with the Water Resource Management Plans published by South East Water and Southern Water to ensure public water supplies are maintained. Additionally, the policy will ensure that all new development integrates the requirements of the Thames River Basin District Management Plan[23] including to improve water quality. • Policy **DM1** and **S5 (Securing strong green and blue infrastructure)** encourage the preparation of Surface Water Drainage Strategies including the implementation of multi-functional SuDs to provide benefits for water quality. • Policy **T40 (Wastewater treatment)** promotes effective wastewater disposal in line with regulatory provisions.	• While MLP policies and consultation with water companies will help reduce water quality impacts, development may still increase sewage discharge into rivers, requiring further monitoring. A residual adverse effect on water quality and ecosystem services remains possible, in line with the precautionary principle. **Deterioration in water quality and ecosystem services has the potential to be a long-term but potentially temporary significant adverse effect.** • National and MLP policies, along with broader water management frameworks, aim to improve water efficiency and mitigate adverse effects. Whilst it is likely that these measures will mitigate any adverse effects, at the time of writing, no data has been made available to confirm whether wastewater treatment works (WwTW) that serve Medway will have capacity for the projected growth, or whether sufficient water resources are available to support water supply for new development. **Uncertainty remains regarding the potential for increased pressure on water supply and wastewater management infrastructure.**

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

8 Conclusions

Summary of findings

N83. Overall, the MLP is expected to deliver a range of positive outcomes, including enhanced biodiversity and ecological networks, improved GI and public greenspace, the provision of needed housing and employment opportunities, and the conservation of mineral resources. The MLP supports sustainable development while promoting climate resilience and economic growth.

N84. Identified adverse effects largely relate to the potential for growth proposed in the MLP to cumulatively lead to an increase in GHG emissions, air and water pollution, and loss of soil resources. These impacts include issues that the MLP cannot fully address alone, such as the increased frequency of storm events linked to broader national and international climate trends. Additionally, the Plan may contribute to residual negative effects on biodiversity, landscape character, urban sprawl, and access to healthcare in rural areas, many of which are long-term and cannot be entirely mitigated through local policy measures.

N85. It will be important to ensure effective monitoring is in place so that Medway Council can respond to these effects during the lifetime of the MLP.

Monitoring

N86. Monitoring proposals are set out in **Table N.8.1** for Medway to consider in the implementation of the MLP.

Table N.8.1: *Proposals for monitoring adverse sustainability impacts of the MLP*

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

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

Consultation and next steps

N87. The Regulation 19 SA Report will be published alongside the Publication Version of the Medway Local Plan.

N88. A minimum of a six-week period of consultation will be undertaken by Medway Council to offer statutory consultees, stakeholders, organisations and individuals an opportunity to submit representations regarding the MLP, as well as supporting evidence including this SA Report.

N89. Following this round of consultation, all comments will be analysed by the Plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.

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