Sustainability Appraisal of the Medway Local Plan

Regulation 19 SA Report

Volume 2 of 3: Regulation 19 SA Report

June 2025

LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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Volume 2 of 3: Regulation 19 SA Report

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Acronyms & abbreviations

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

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

1 Introduction

1.1 Purpose of this report

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

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

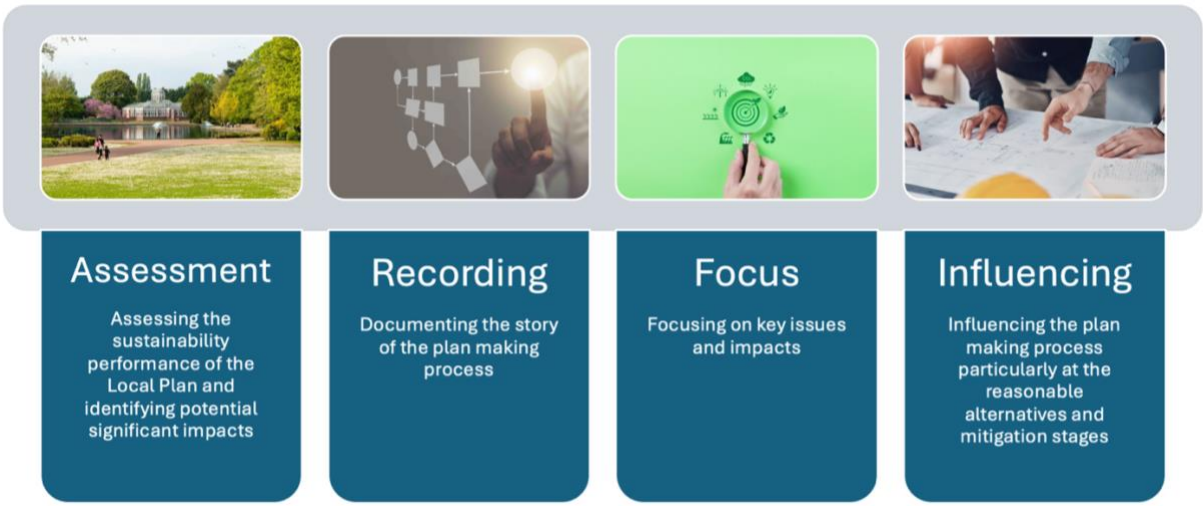


Figure 1.1: *Some key purposes of the SA process*

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

1.2 Sustainability Appraisal

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

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

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

1.3 Strategic Environmental Assessment

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

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

1.4 Integrated approach to SA and SEA

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

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

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

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

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

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

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

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

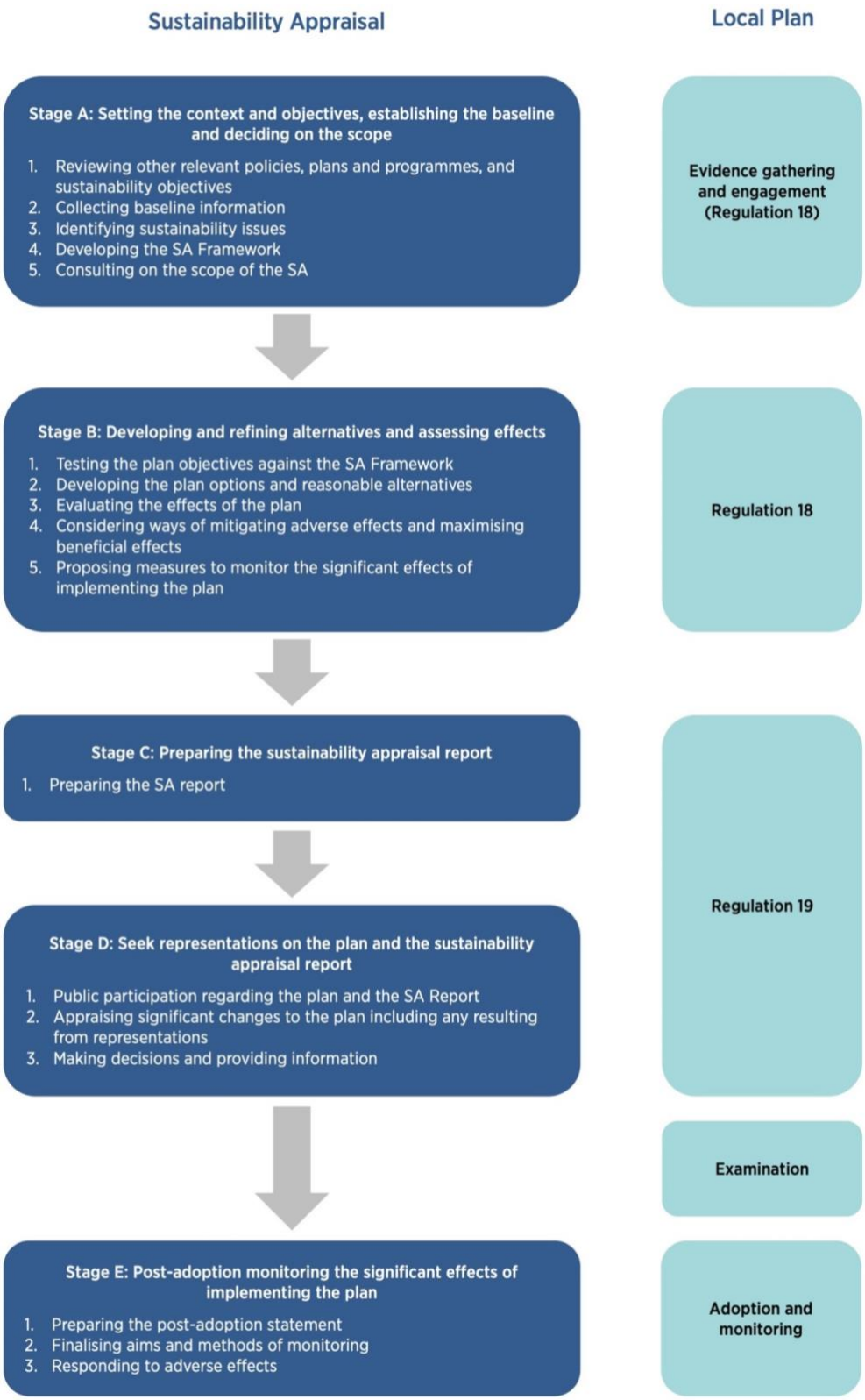


Figure 1.2: *Sustainability appraisal process alongside local plan stages*

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

1.5 Legislative context

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

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

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

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

1.6 How to read and understand the R19 SA Report

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

- **VOLUME 1: Non-Technical Summary** provides a summary of the Regulation 19 SA work.

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

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

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

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

- **Chapter 19** outlines the conclusions, residual effects and next steps.

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

2 Sequencing of the MLP and SA process

2.1 Geography of the Plan area

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

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

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

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

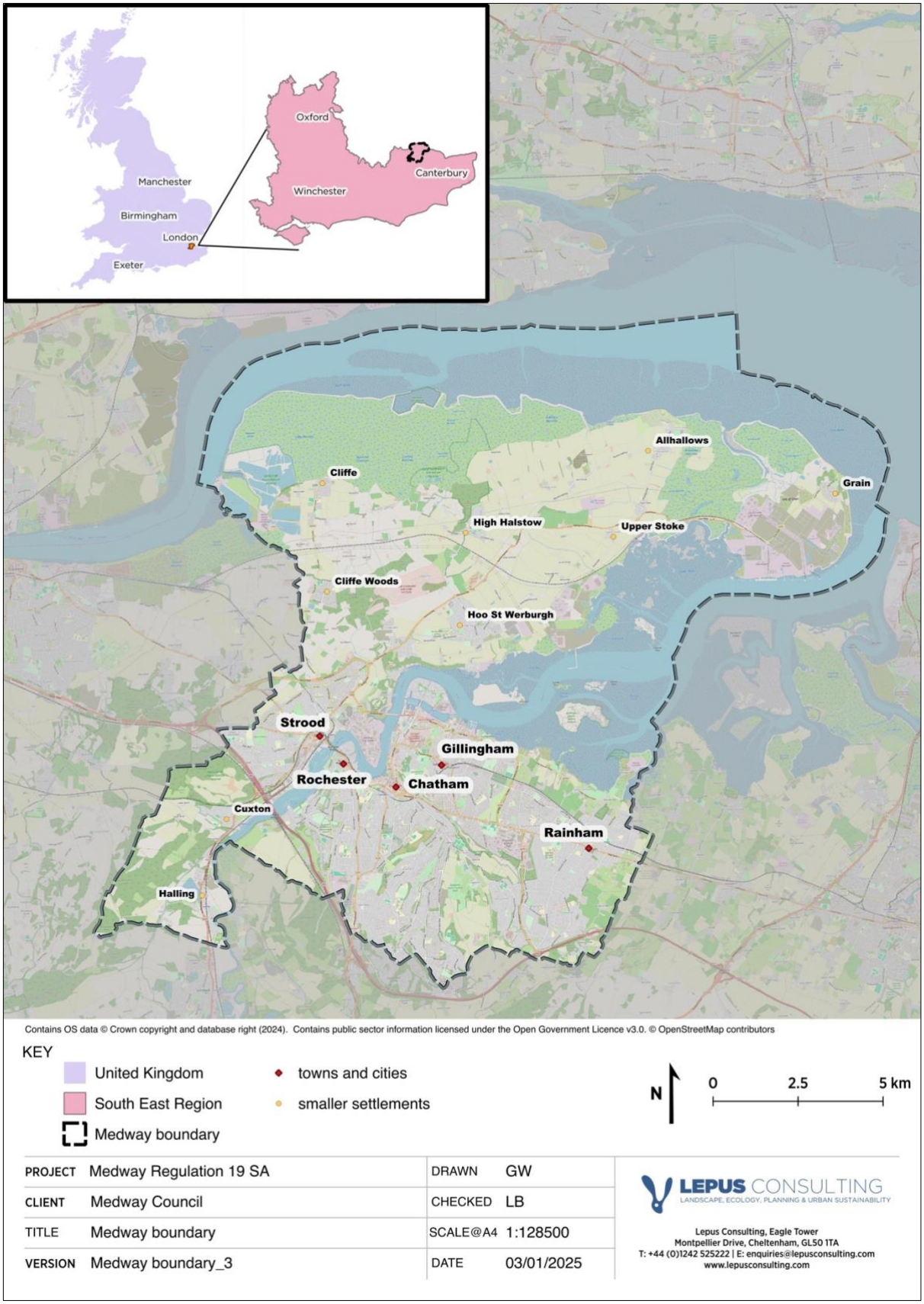


Figure 2.1: *Medway Local Plan area*

2.2 The Medway Local Plan

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

2.2.2 The MLP aims to strengthen Medway's 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.

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

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

Regulation 18 Consultation (2023)

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

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

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

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

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

Regulation 18 Consultation (2024)

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

Regulation 19 Publication Consultation (2025)

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

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

2.3 Sustainability Appraisal alongside the MLP stages: Iteration

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

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

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

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

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

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

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

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

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

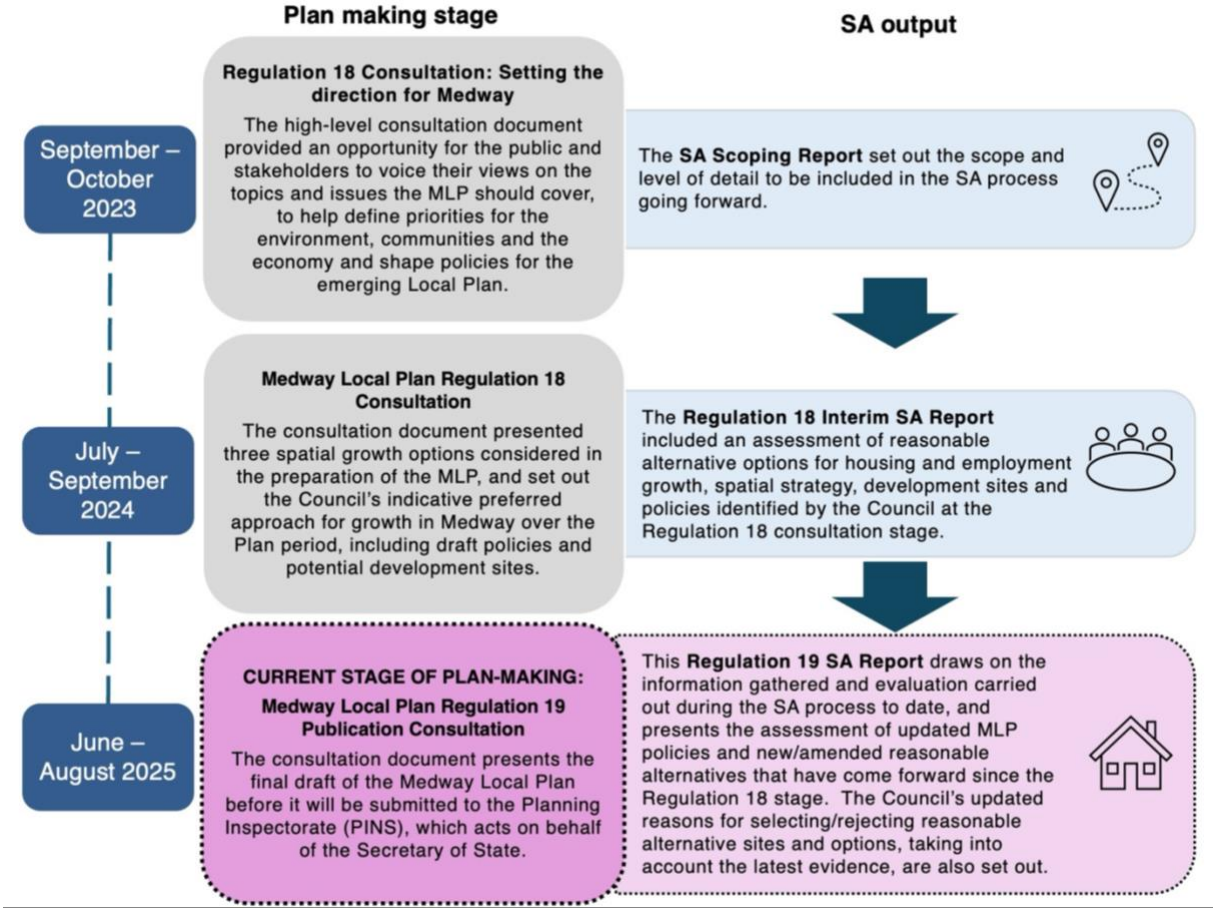


Figure 2.2: *The MLP and SA process so far*

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

2.4 Meeting the requirements of the SEA Regulations

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

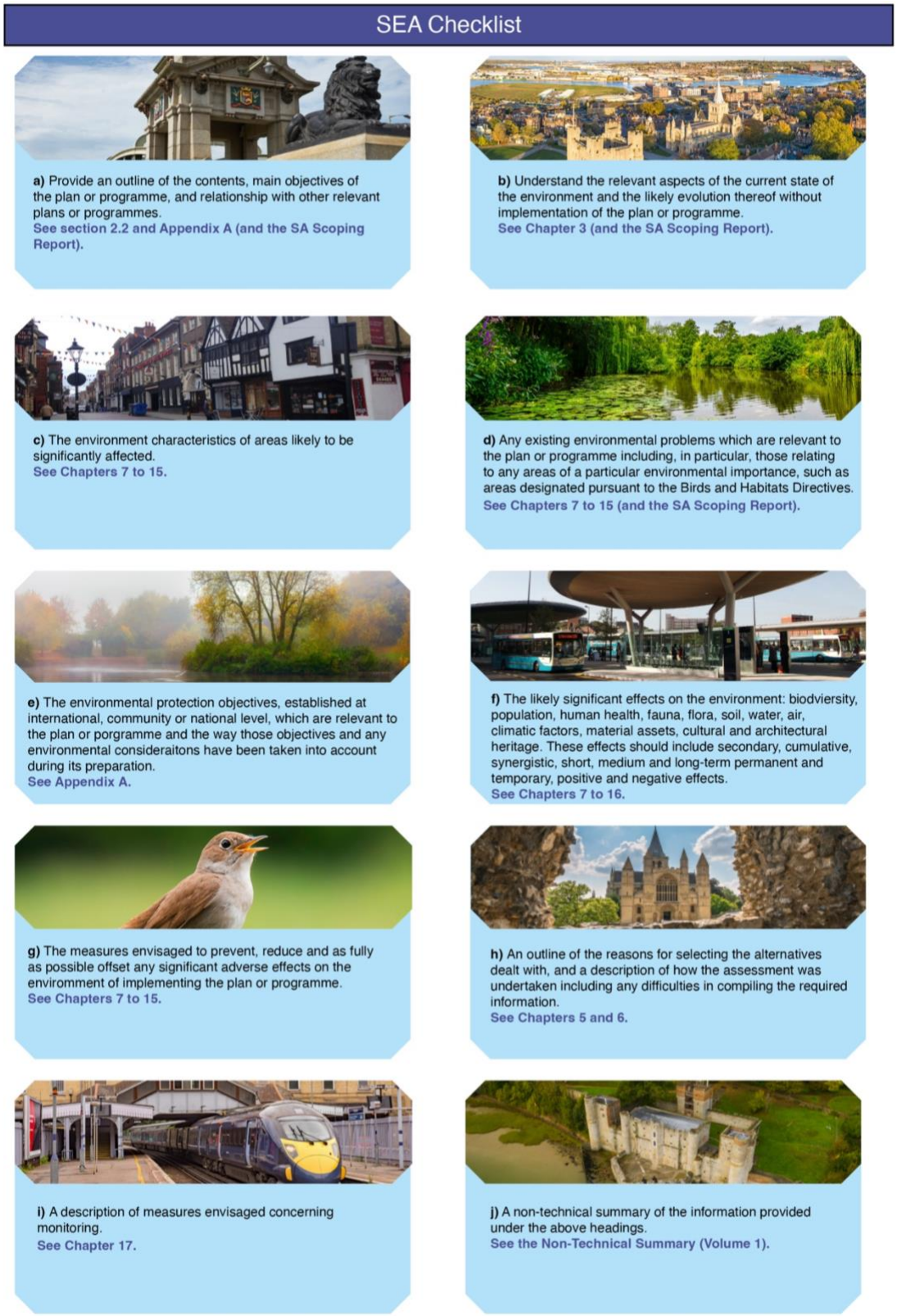


Figure 2.3: *SEA checklist*

3 Evolution of the environment without the MLP

3.1 Overview

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

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

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

Table 3.1: *Likely evolution without the MLP*

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

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

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

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

4 Methodology

4.1 Scope of the Sustainability Appraisal

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

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

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

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

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

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

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

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

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

Table 4.1: *Summary of the SA Objectives*

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	**Climate Change Mitigation:** Minimise Medway's contribution to climate change.	Climatic factors
2	**Climate Change Adaptation:** Plan for the anticipated impacts of climate change.	Climatic factors, soil, water
3	**Biodiversity and Geodiversity:** Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of Medway.	Biodiversity, flora and fauna
4	**Landscape and Townscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	Landscape and cultural heritage
5	**Pollution and Waste:** Reduce waste generation, increase the reuse and recycling of materials whilst minimising the extent and impacts of water, air and noise pollution.	Air, water, soil, human health and material assets
6	**Natural Resources:** Protect, enhance and ensure the efficient use of Medway'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

4.2 Best practice guidance

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

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

4.3 Appraisal process

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4.4 Impact assessment and determination of significance

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

Sensitivity

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

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

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

Table 4.2: Impact sensitivity

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

Magnitude

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

Table 4.3: Impact magnitude

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

4.5 Significant effects

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

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

Table 4.4: *Guide to scoring significant effects*

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

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

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

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

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

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

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

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

4.6 Limitations of predicting effects

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

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

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

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

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

5 Reasonable alternatives

5.1 Context

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

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

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

5.2 Different types of reasonable alternatives

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

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

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

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

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

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

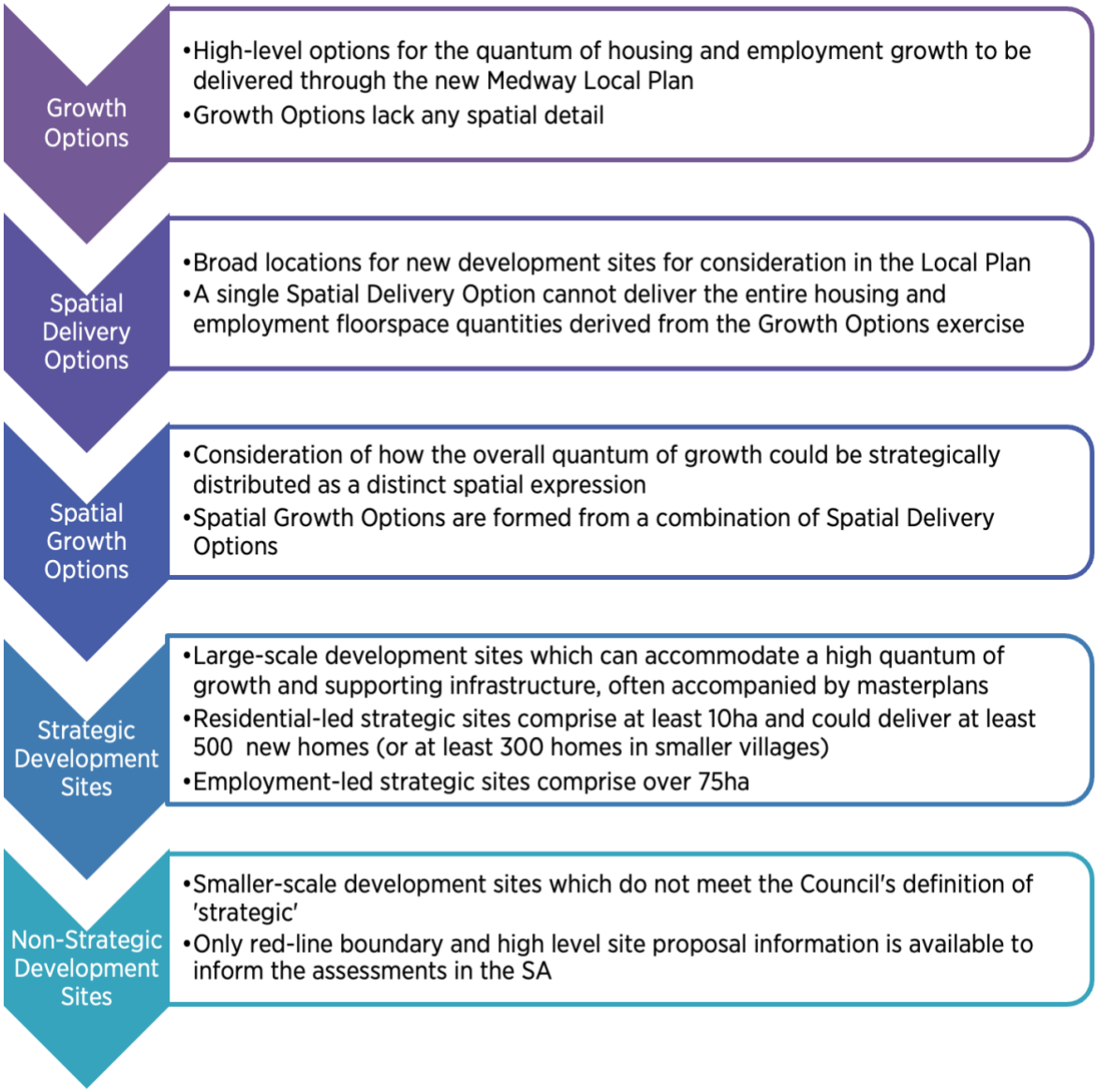


Figure 5.1: *Definitions of reasonable alternatives evaluated in the SA process*

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

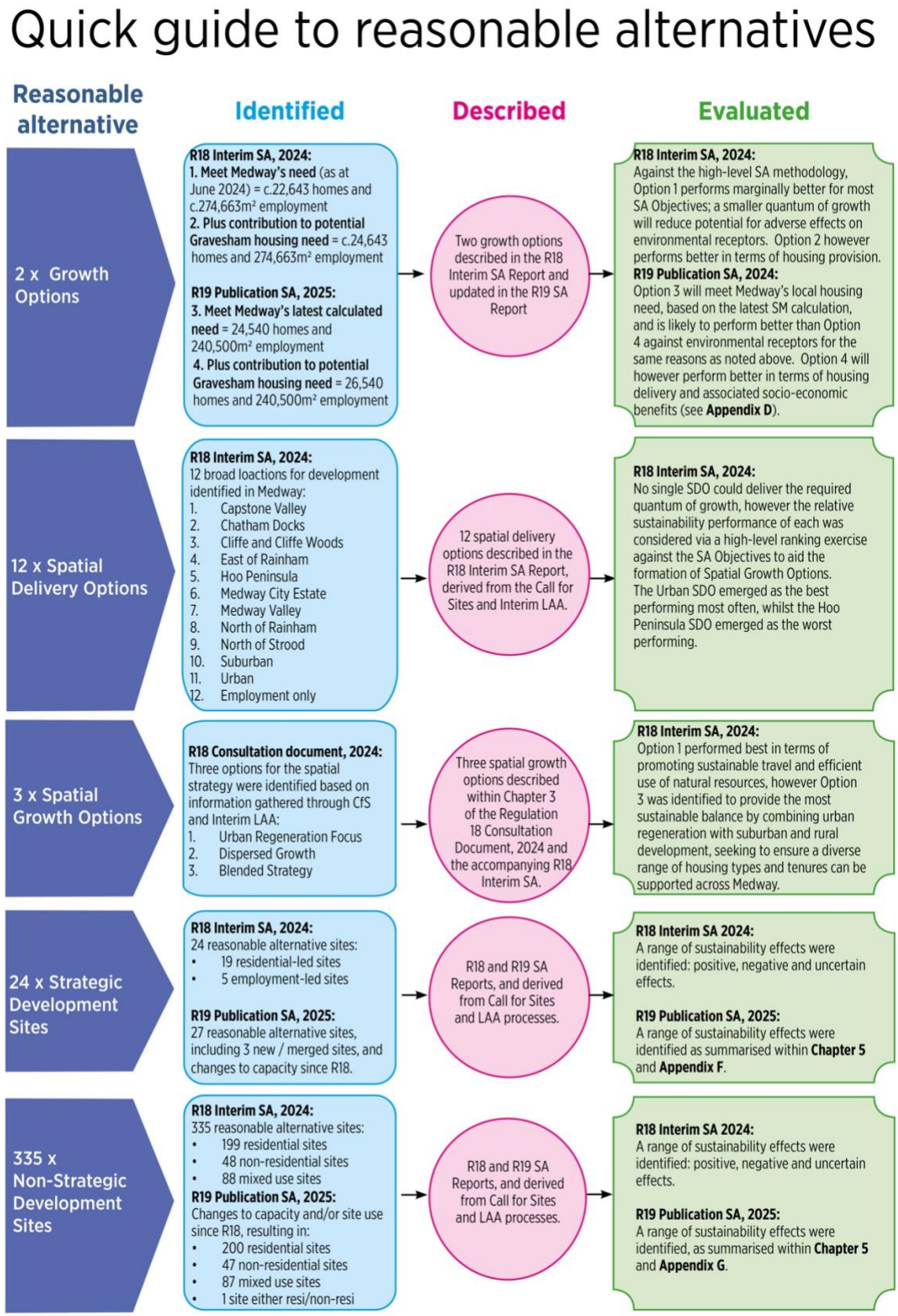


Figure 5.2: *The identification, description and evaluation of reasonable alternatives considered at different stages during the plan-making process for the MLP*

5.3 Growth options

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

Appraisal of growth options at Regulation 18 (June 2024)

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

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

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

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

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

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

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

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

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

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

Appraisal of growth options at Regulation 19

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

5.3.7 The latest Standard Method calculation for Medway is 1,636 dwellings per annum[34]. Across the proposed 15-year Plan period, this equates to a total housing need of 24,540 dwellings. In terms of employment needs, the 2025 Employment Land Needs Assessment (ELNA)[35] identified a need for a minimum of 204,000 sqm of industrial floorspace and 36,500 sqm of office floorspace (totalling 240,500 sqm).

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

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

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

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

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

[35] Rapleys (2025) Medway Employment Land Needs Assessment, February 2025

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

5.3.11 Option 3 will meet the latest calculated need based on the Standard Method calculation (1,636 dwellings per annum[36]); although, this option would not include any provisions to meet other authorities' needs, unlike Option 4.

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

Selection and rejection of growth options

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

5.4 Spatial delivery options

5.4.1 Drawing on information gathered through Call for Sites exercises and the Interim Land Availability Assessment (LAA)[37] and sites promoted in response to the previous Regulation 18 consultation (2023), 12 'spatial delivery options' (SDOs) were identified by the Council. The assessment of the 12 SDOs is presented within Appendix B of the Regulation 18 (2024) Interim SA Report[38].

[36] 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]

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

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

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

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

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

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

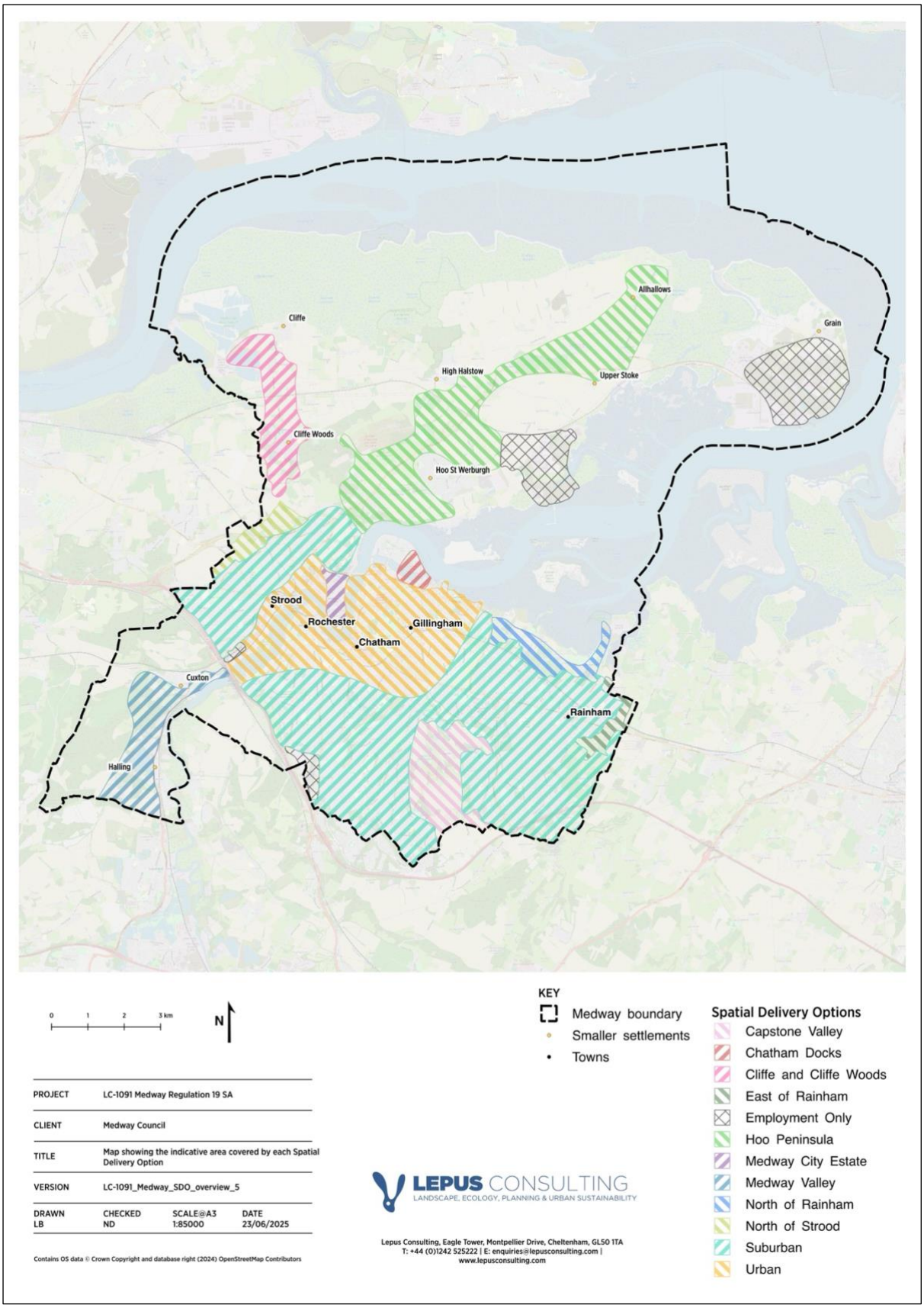


Figure 5.3: *Map showing the indicative broad areas covered by each Spatial Delivery Option*

5.4.4 **Table 5.4** summarises the SA findings. The assessments and ranking of SDOs are presented in full within the Regulation 18 (2024) Interim SA Report[39].

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

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

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

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

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

Selection and rejection of spatial delivery options

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

5.5 Spatial growth options

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

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

5.5.3 Drawing on information gathered through Call for Sites exercises and the Interim LAA[40] and sites promoted in response to the previous Regulation 18 consultation (2023), three spatial growth options (which constitute reasonable alternative spatial strategies) have been identified by the Council and are summarised in **Table 5.5**. All three options could theoretically meet the identified housing and employment needs for Medway, and are based upon a combination of different spatial delivery options (see **Section 5.4**).

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

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

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

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

5.5.4 **Table 5.6** summarises the SA findings and indicates the best performing option against each SA Objective. The assessments and rankings of the spatial growth options are presented in full within the Regulation 18 SA Interim Report[41].

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

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

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

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

Selection and rejection of spatial growth options

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

5.6 Reasonable alternatives: development sites

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

5.6.1 The Medway Call for Sites request opened in November 2022 and closed at the end of February 2023[42], from which a total of 146 valid submissions were received. Medway Council prepared an Interim LAA in October 2023[43] and a small number of sites were promoted in response to the previous Regulation 18 consultation (2023). The LAA process has considered the following sources of sites in addition to those received through the Call for Sites exercise:

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

5.6.2 A total of 447 sites have been identified by the Council through the LAA process and have undergone an initial filtering process. The initial survey screened out sites which would not be capable of delivering five or more homes / 0.25ha of employment floorspace, and sites which could lead to unacceptable impacts on areas where the NPPF provides strong reasons for restricting the overall scale, type or distribution of development[44].

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

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

- 19 were residential-led; and

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

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

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

- Five were employment-led).

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

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

5.6.6 The pre-mitigation assessment of the 24 strategic and 335 non-strategic reasonable alternative sites demonstrated a range of sustainability impacts. The full assessment of the 24 strategic reasonable alternative sites is presented in full within Appendix D, and non-strategic sites within Appendix E, of the Regulation 18 Interim SA Report[45].

5.6.7 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.

Evaluation of reasonable alternative sites at Regulation 19

5.6.8 Following the Regulation 18 consultation in early 2024, Medway Council have produced an updated LAA (2025)[46], and provided updated information for 53 non-strategic reasonable alternative sites, including capacity changes and change of the proposed site use[47]. This now means 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.

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

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

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

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

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

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

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

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

5.6.12 All reasonable alternative sites have been assessed before and after mitigation. The main purpose of this exercise is to avoid any risk of 'green wash': a process whereby immediate application of policy prescription can give the impression that no adverse effects will arise, without knowing the extent of adverse effect that existed in the first place. This process helps achieve transparency in the appraisal process and follows established best practice (RTPI Guidance 2018[48]) of presenting assessment results before and after mitigation has been applied. Evaluating policies in the SA enables scrutiny of how effective the policies are as mitigation tools.

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

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

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

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

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

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

5.6.17 **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

6.1 MLP policies

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

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

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

Table 6.1: *Medway Local Plan policies*

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

Reference	Policy name
T7	Houseboats
T8	Houses of multiple occupation
T9	Self-build and custom housebuilding
T10	Gypsy, Travellers and Travelling Showpeople
T11	Small sites and SME housebuilders
S10	Economic strategy
S11	Existing employment provision
S12	New employment sites
T12	Learning and skills development
T13	Tourism, culture and visitor accommodation
S14	Supporting Medway's culture and creative industries
T14	Rural economy
S15	Town Centres Strategy
S16	Hierarchy of centres
T15	Sequential assessment
T16	Ancillary development
T17	Impact assessment
S17	Chatham Town Centre
S18	Rochester District Centre
S19	Gillingham District Centre
S20	Strood District Centre
S21	Rainham District Centre
S22	Hoo Peninsula
S23	Hempstead Valley District Centre
DM12	Local and rural centres
T18	Shopping parades and neighbourhood centres
T19	Meanwhile uses
DM13	Medway Valley Leisure Park
DM14	Dockside
DM15	Monitoring and managing vehicle trip generation
T20	Riverside Path
DM16	Chatham Waters Line
DM17	Grain Branch
T21	Riverside infrastructure
T22	Marinas and moorings
T23	Aviation
T24	Urban logistics
T25	User hierarchy and street design
T26	Accessibility standards
DM18	Transport assessments, transport statements and travel plans
DM19	Vehicle parking
DM20	Cycle parking and storage
T27	Reducing health inequalities and supporting health and wellbeing
T28	Existing open space, outdoor sports and play spaces

Reference	Policy name
DM21	New open space, outdoor sports and play spaces
T29	Community and cultural facilities
S24	Infrastructure delivery
DM22	Digital communications
T30	Safeguarding mineral resources
T31	Safeguarding of existing mineral supply infrastructure
T32	Supply of recycled and secondary aggregates
T33	Extraction of land won minerals
DM23	Waste prevention
T34	Safeguarding of existing waste management facilities
T35	Provision of additional waste management capacity
T36	Location of waste management facilities
T37	Other recovery
T38	Non-inert landfill
T39	Beneficial use of inert waste by permanent deposit
T40	Wastewater treatment
S25	Energy supply
T41	Heat networks

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

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

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

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

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

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

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

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

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

6.2 Assessment of site allocations

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

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

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

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

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

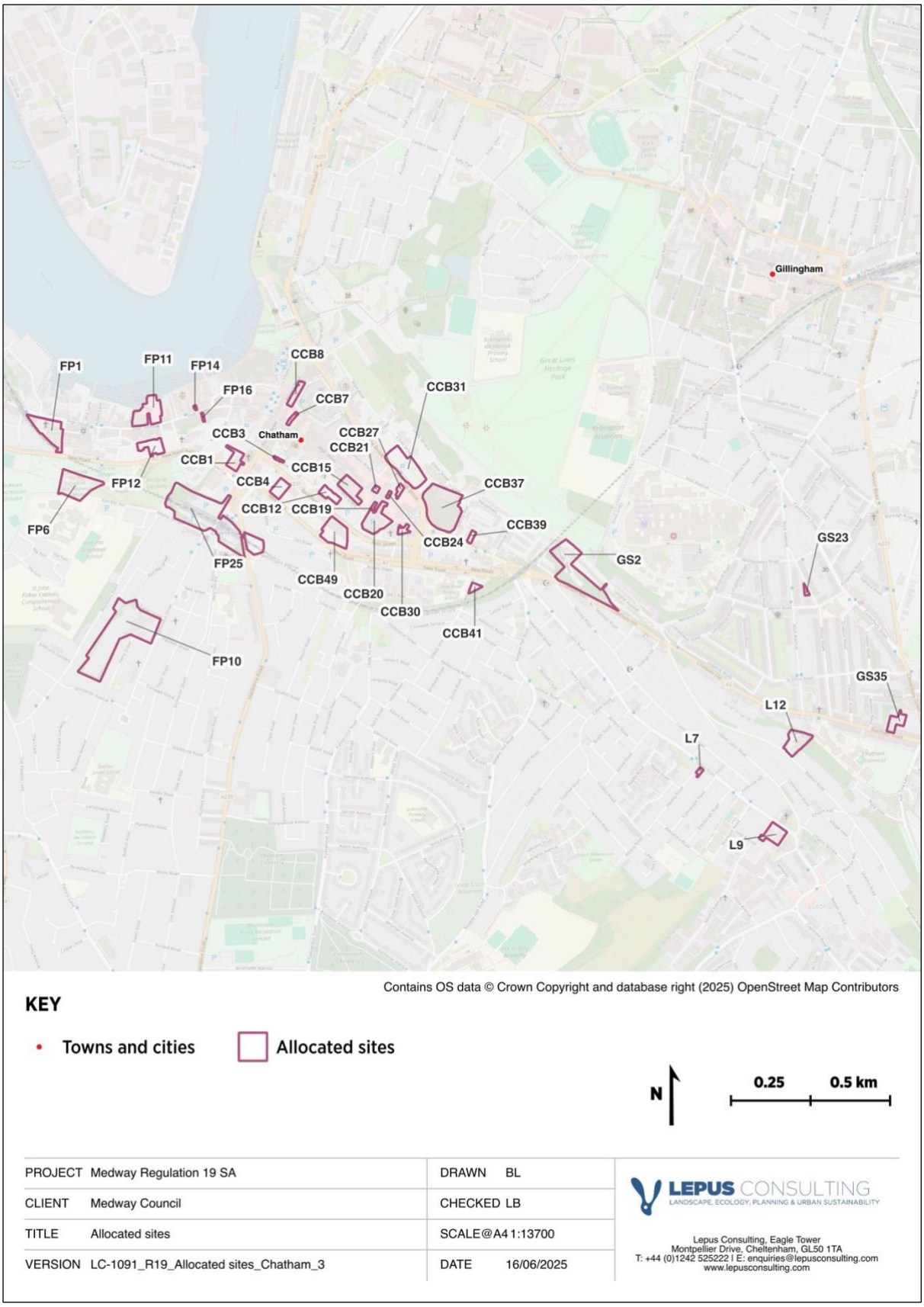


Figure 6.1: *Map showing the location of allocated sites in and around Chatham*

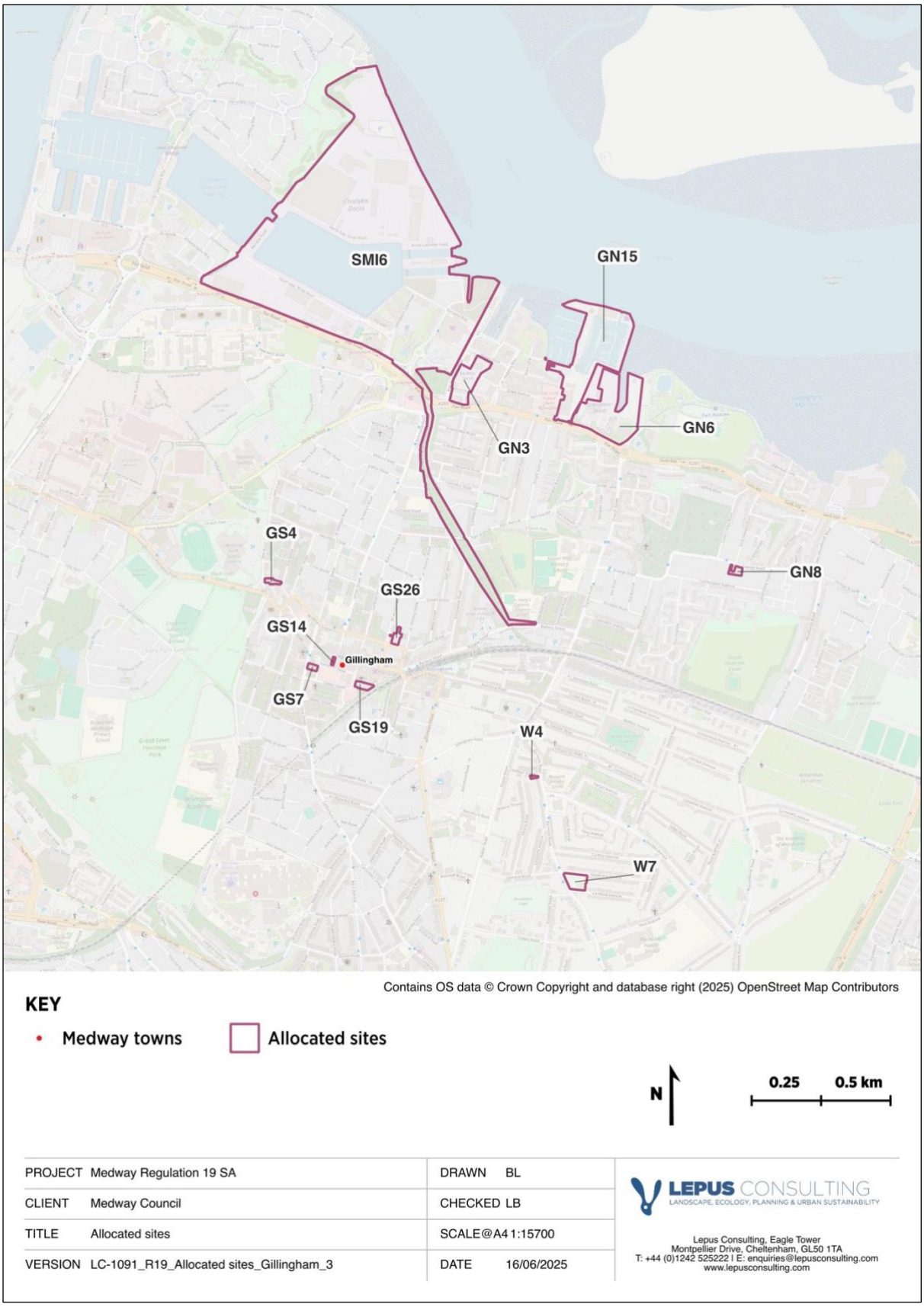


Figure 6.2: *Map showing the location of allocated sites in and around Gillingham*

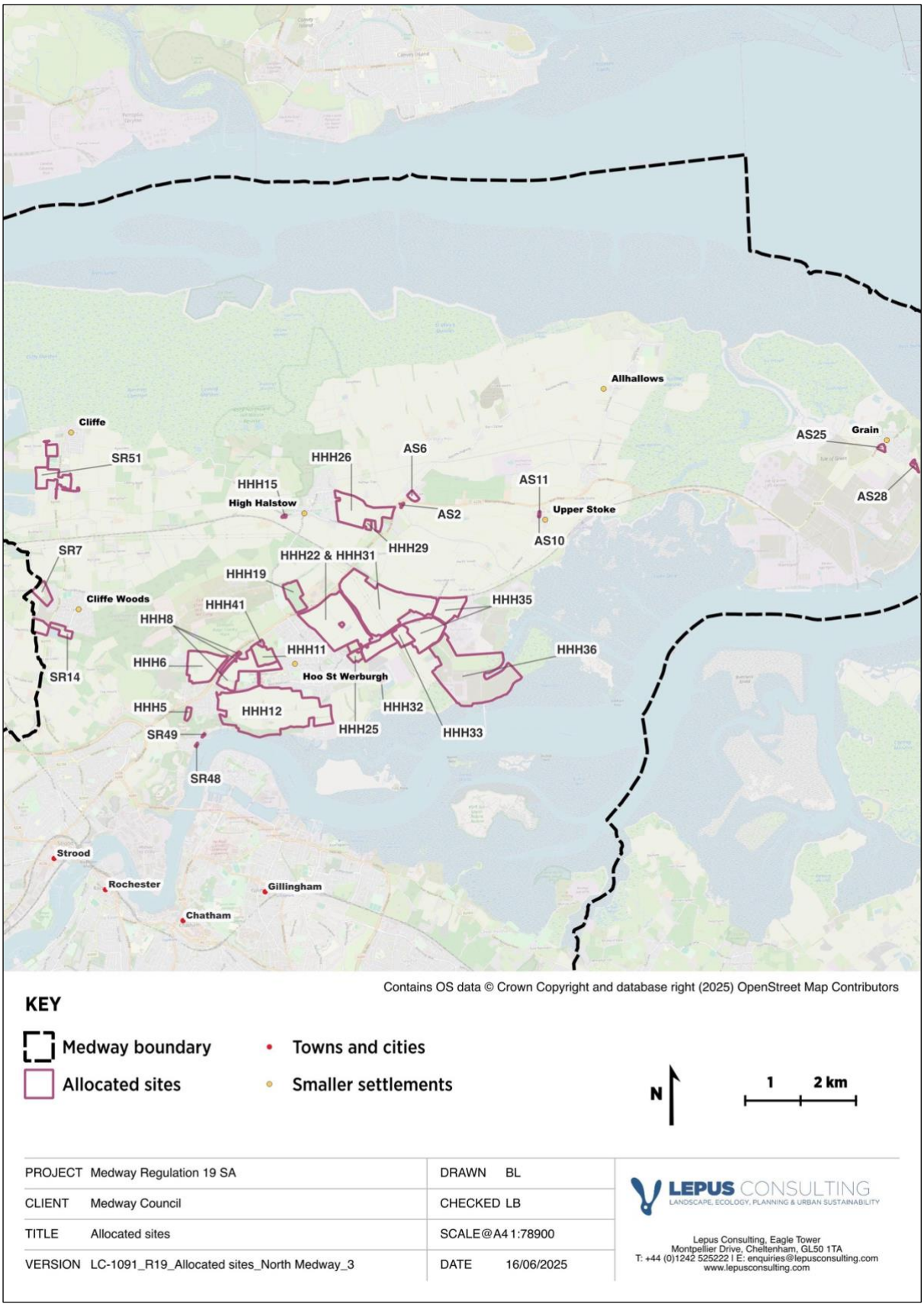


Figure 6.3: *Map showing the location of allocated sites in the north of Medway*

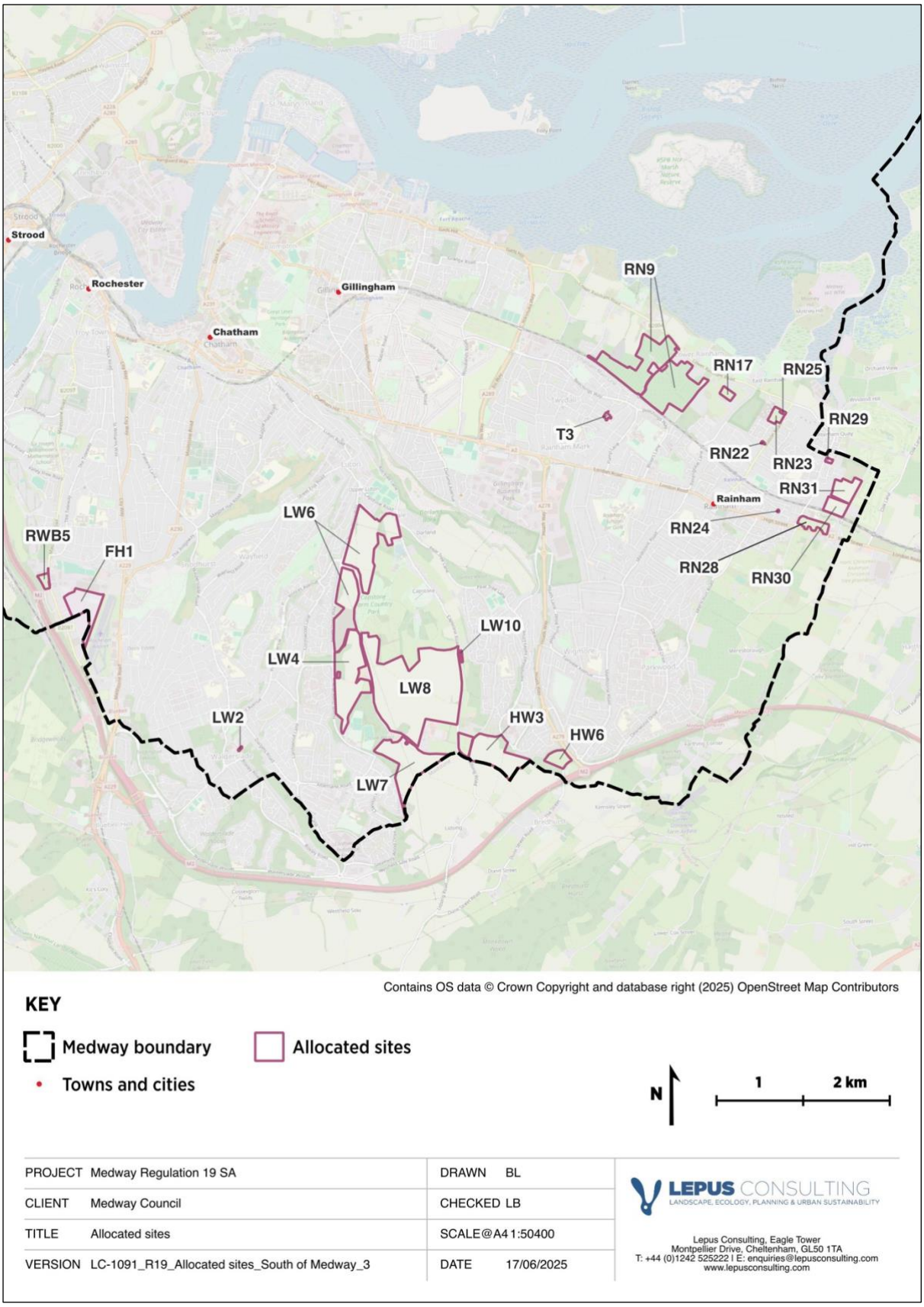


Figure 6.4: *Map showing the location of allocated sites in the south of Medway*

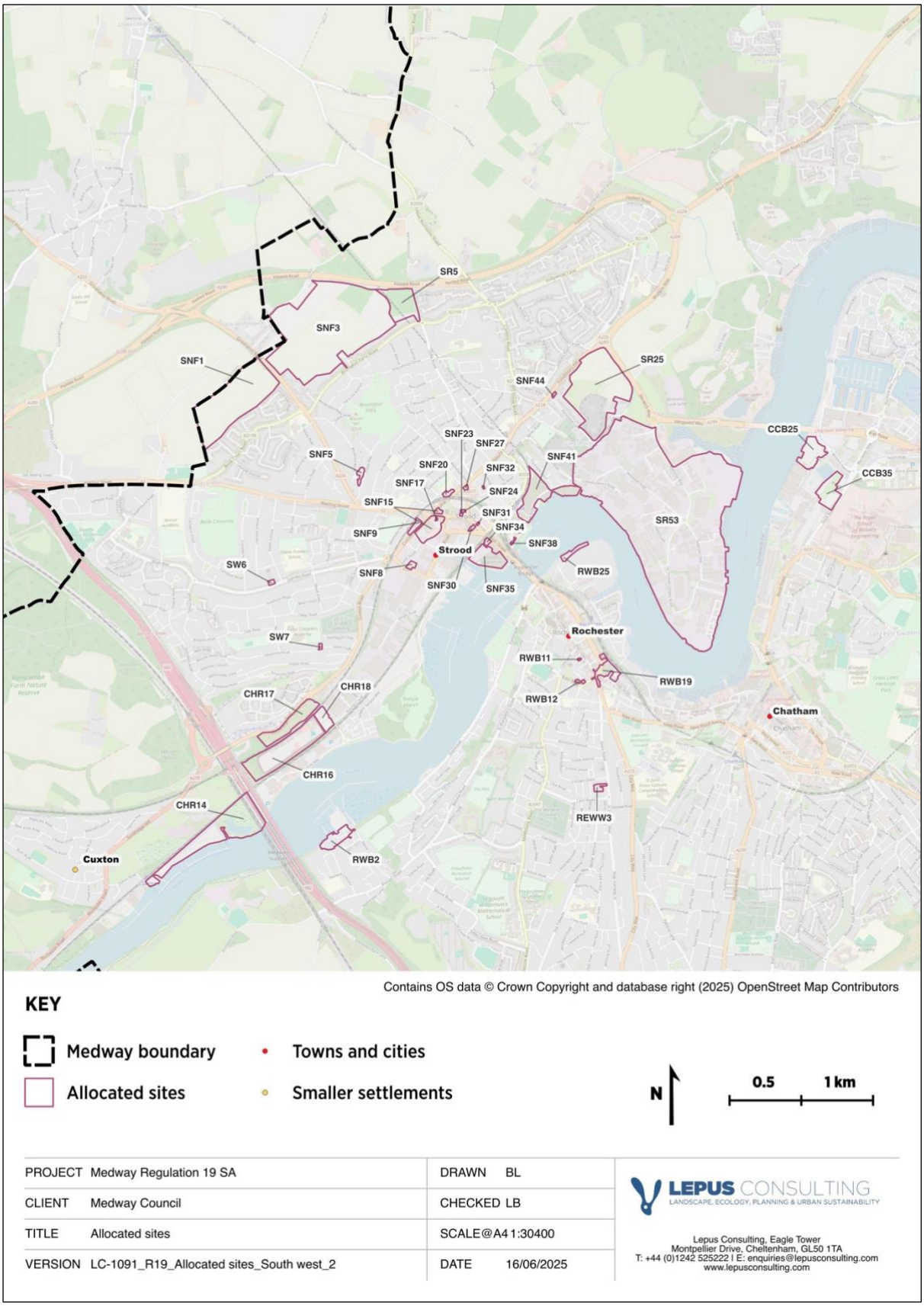


Figure 6.5: *Map showing the location of allocated sites in the south west of Medway*

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

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

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

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

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

6.3 Site allocation policies

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

Table 6.4: *Medway Local Plan site allocation policies*

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

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

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

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

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

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

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

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

6.4 Whole plan appraisal

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

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

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

7 Air

7.1 Baseline

7.1.1 Poor air quality is among the largest environmental risks to public health in the UK. Several objectives have been established in relation to air quality at the European, UK and regional levels seeking to reduce emissions of specific pollutants to minimise adverse effects on health and the environment. Key legislation / PPPs include the Environment Act (2021)[49] which sets out air quality as a priority area, the Air Quality Plan for NO_2[50] and the Clean Air Strategy[51]. See **Appendix A** for more details of relevant PPPs.

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

__Table 7.1__: Fraction of mortality attributable to particulate air pollution (2022)[52]

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

7.1.3 Poor air quality, and in particular excess atmospheric nitrogen deposition, can also have a variety of impacts on the natural environment which often result in losses in biodiversity, resulting from eutrophication, acidification and toxicity[53][54].

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

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

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

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

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

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

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

7.1.5 The Medway Air Quality Action Plan (2024)[55] replaces the previous action plan which ran from 2015-2020, and outlines the context and importance of air quality in Medway including six priorities to achieve compliance with national air quality objectives.

7.1.6 It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) in their Transport Analysis Guidance consider that, *"beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant"*[56]. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers[57] [58]. Exposure to road transport associated emissions may have long term health impacts.

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

Key issues for air quality include:

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

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

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

7.2 Evaluating the effect of the MLP on air

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

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

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

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

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

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

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

Identified effects on air	Mitigating MLP policies	Summary of residual effect
 **Increased generation of, and exposure to, air pollution** The construction and occupation of 21,194 new homes and new employment floorspace proposed in the MLP, and associated traffic generated, is likely to increase emissions of pollutants including NO_2 and PM_{10}, resulting in a worsening of local air quality. An increase in air pollution could potentially have adverse impacts on ecological networks in Medway which are vulnerable to eutrophication, acidification and increased toxicity. Exposure to sources of air pollution can lead to adverse effects on the health of residents, with children and the elderly being particularly vulnerable. Some 58 allocated sites are located within 200m of an AQMA, and 84 sites within 200m of main road, where there is higher potential for adverse effects associated with exposure to air pollutants.	• Policy **DM3 (Air quality)** promotes appropriate design to reduce emissions, such as the installation of electric charging points and low NO_2 boilers. Development which is expected to negatively impact air quality will provide an air pollution impact assessment with mitigation measures, including development located in proximity to an AQMA or a biodiversity designation. • The **Spatial Development Strategy**, Policy **T26 (Accessibility standards)** and Policy **DM20 (Cycle parking and storage)** aim to reduce reliance on cars and the need to travel through facilitating sustainable and active modes of transport. • Policy **S5 (Securing strong green and blue infrastructure),** Policy **T27 (Reducing health inequalities and promoting health and wellbeing),** and Policy **DM6 (Sustainable design and construction)** all support provision of infrastructure that reduces air pollution levels. • Site Policy **SA1 (Chatham Town Centre and Surrounds)** will ensure air quality in Central Medway AQMA is addressed through the proposal design.	Despite technological and infrastructure advancements, the proposed development of new homes and employment sites within the Plan area will be expected to cumulatively increase the volume of traffic and a result in a greater demand for energy. As such, increased pollutant emissions, particularly NO_2 and PM_{10}, will be likely that cannot be fully mitigated by MLP policies alone. The transition to clean technologies will continue to take place and will align with, amongst other influences, the government commitment to net zero by 2050. The government is also committed to increasing the overall quantity of electric vehicles. It is aiming to ensure that 80% of new cars and 70% of new vans sold in Great Britain will be zero emission by 2030, increasing to 100% by 2035. **The long-term effect on emissions and air quality is likely to be positive, but short-term negative effects are expected.**

8 Biodiversity, flora and fauna

8.1 Baseline

8.1.1 The conservation of biological and geological diversity and the protection and monitoring of endangered and vulnerable species and habitats is of great importance. National and European policies identify a hierarchy of designations which aim to promote the protection and enhancement of the natural environment. Key PPPs include the 25 Year Environment Plan[59] and the Biodiversity Strategy for England[60] which seek to halt biodiversity loss, promote nature recovery, and expand multi-functional green infrastructure (GI) networks. See **Appendix A** for more details of relevant PPPs.

European sites

8.1.2 European sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within Europe. These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive[61] and Special Protection Areas (SPAs) classified under the Birds Directive[62]. Additionally, the NPPF requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated European sites.

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

8.1.4 European sites, and associated functionally linked habitat, located within and in proximity to the MLP area, include the Thames Estuary and Marshes Ramsar/SPA in the north and the east and the North Downs Woodland SAC in the Medway Valley to the south (see **Figure 8.1**). The North Downs Woodland SAC is protected for its mature Beech forests and Yew woods within a mosaic of scrub and areas of unimproved chalk grassland[63].

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

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

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

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

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

8.1.5 A common approach taken across the UK to address recreational impacts at European sites is to establish a Zone of Influence (ZOI) based on detailed visitor survey data. The ZOI is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance at which 75% of interviewees surveyed have travelled to reach a particular site (based on a review of visitor survey data). Recreational ZOIs have been undertaken for the North Downs Woodlands SAC and at the Thames Estuary and Marshes Ramsar/SPA. A 7km buffer has been applied to the North Downs Woodland SAC on the basis of visitor survey work[64]. A 6km buffer has been applied to the Medway and Thames Estuary and Marshes SPA and Ramsar on the basis of the Strategic Access Management and Monitoring (SAMMs) work[65].

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

8.1.7 The Regulation 19 Interim HRA[66] identified likely significant effects (LSEs) at the following European sites as a result of the development proposed from the MLP during the Screening exercise:

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

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

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

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

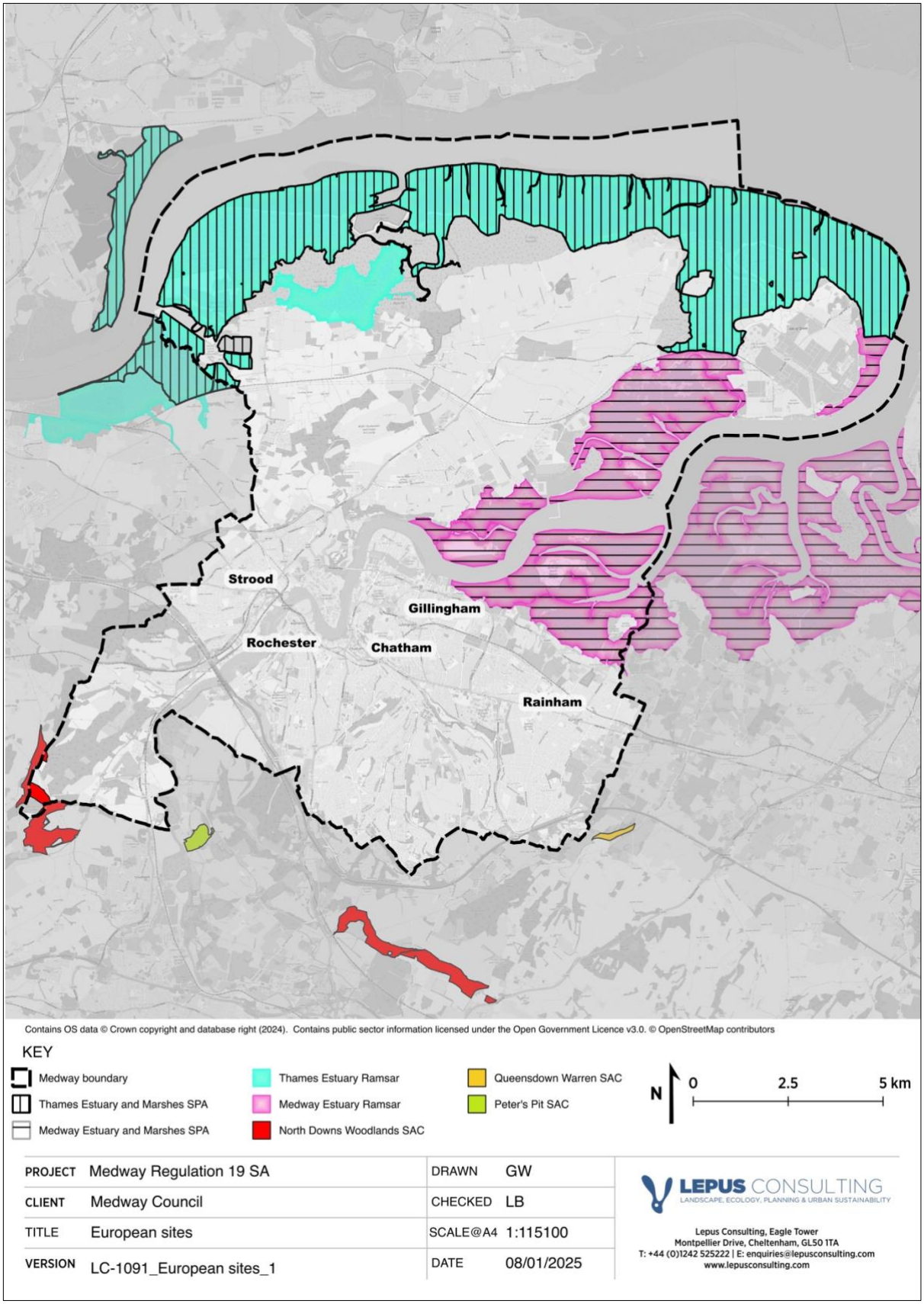


Figure 8.1: *European sites within Medway*

National and local designations

8.1.8 There are eight SSSIs (Sites of Special Scientific Interest) within Medway (see **Figure 8.2**), covering approximately 7,840.54ha:

- South Thames Estuary and Marshes SSSI;
- Medway Estuary and Marshes SSSI;
- Cobham Woods SSSI;
- Northward Hill SSSI;
- Dalham Farm SSSI;
- Chattenden Woods and Lodge Hill SSSI;
- Tower Hill to Cockham Wood SSSI; and
- Halling to Trottiscliffe Escarpment SSSI.

8.1.9 All eight SSSIs protect valuable habitats, species, and natural features including the Chattenden Woods and Lodge Hill SSSI which supports one of the largest populations of Nightingales (*Luscinia megarhynchos*) in the UK[67]. Two NNRs lie within Medway: High Halstow NNR in the north of the Plan area on the Hoo Peninsula; and the newly designated North Kent Woods and Downs NNR in the south west of the Plan area near Cuxton.

8.1.10 Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to SSSIs. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts[68]. Where a development proposal falls within more than one SSSI IRZ, the worst-case risk zone is reported upon in the assessment.

8.1.11 Marine Conservation Zones (MCZ) are areas that protect a range of nationally important, rare or threatened habitats and species. The Medway Estuary is designated as an MCZ, comprising a complex and dynamic ecosystem of fresh and sea waters, with tidal and intertidal areas, supporting a range of relatively rare species in the South East including the tentacled lagoon-worm (*Alkmaria romijni*)[69].

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

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

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

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

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

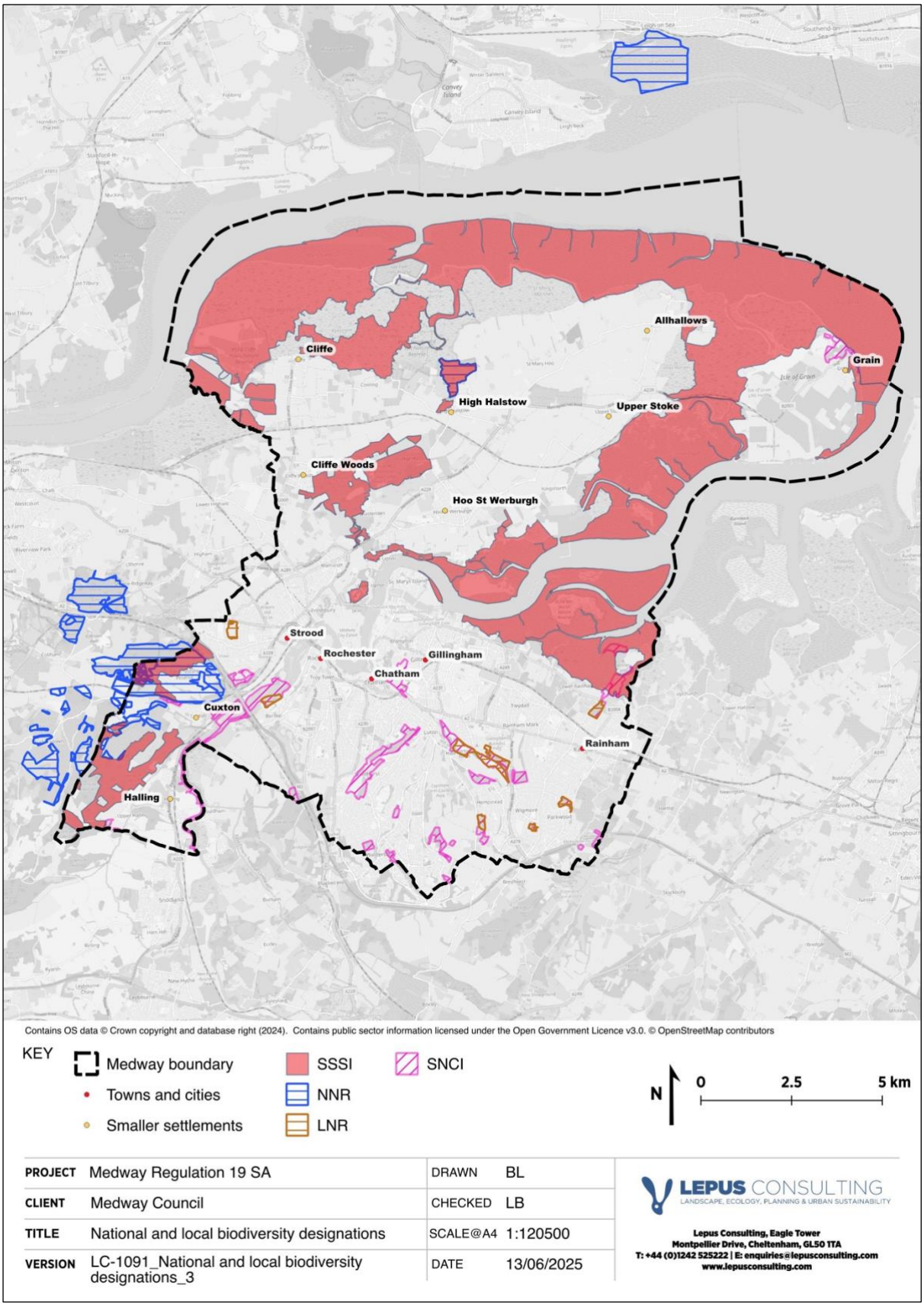


Figure 8.2: *National and local biodiversity assets in and around Medway*

Ancient woodland

8.1.14 The NPPF defines ancient woodland as having been wooded continuously since at least 1600AD. They have a rich cultural history, shaped by centuries of human interaction and management. Ancient woodland is usually a biodiverse habitat that cannot be easily recreated. The NPPF also recognises and advocates the protection of 'plantations on ancient woodland sites'. The Medway administrative area contains 693.10 hectares of ancient woodland, accounting for 2.58% of Medway's total area[70].

Geodiversity

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

- Halling Chalk Pit RIGS;
- Bores Hole RIGS;
- Fort Amherst RIGS; and
- Francis Chalk Quarry RIGS.

Green infrastructure

8.1.16 Well planned and managed green infrastructure (GI) can enhance ecosystem health and resilience, contributing to biodiversity conservation and human wellbeing[71]. Medway is home to numerous natural / semi-natural open spaces, such as Ranscombe Farm and Cliffe Pools, alongside country parks and a number of smaller parks, greens and amenity spaces within the town and villages that are home to playgrounds and sports facilities. Such GI provides the Plan area with ecosystem services including storage and filtration of water, provision of natural flood protection, as well as increased availability of habitats and connectivity within the green network enabling movement of species.

Priority habitats

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

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

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

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

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

- Traditional orchard.

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

Key issues for biodiversity, flora and fauna include:

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

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

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

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

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

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

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

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

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

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

Identified effects on biodiversity, flora and fauna	Mitigating MLP policies	Summary of residual effect
 **Threats or pressures to European sites** A small proportion of one allocated site, based on the land ownership boundary provided (Site HHH36), coincides with the Medway Estuary and Marshes SPA/Ramsar, and a further eight allocated sites are located within 400m of these designations (HHH12, RN9, AS28, GN15, GN6, HHH32, RN23 and RN2). Development at these nine sites could give rise to direct impacts on the qualifying features of these European sites. LSEs have been identified in the HRA screening process via impact pathways including air quality, water quality/quantity and recreational pressures (see **section 8.1**). This includes some 122 allocated sites that lie within the identified recreational ZOIs around the Medway and Thames Estuary and Marshes SPA and Ramsar sites (6km) and North Downs Woodland SAC (7km), where development could impact the integrity of European sites without mitigation.	• Policy **S2 (Conservation and enhancement of the natural environment)** requires development proposals to strengthen biodiversity networks and ensure an effective mitigation approach in particularly sensitive locations, including European sites. • Policy **S3 (North Kent Estuary and Marshes designated sites)** requires residential development within the ZOI to contribute to the North Kent SAMMS, and highlights that larger sites beyond the ZOI may need to secure appropriate mitigation to offset adverse recreational effects. • Policy **S5 (Securing strong green and blue infrastructure)** encourages the use of GI to provide the highest level of protection for European sites. • Site Policy **SA8 (Hoo St Werburgh and Chattenden)** will ensure compliance with the emerging Strategic Environmental Management Plan, to include delivery of new parkland and wetland habitats (including Cockham Community Parkland within Site HHH12). • Accompanying masterplan information for Site HHH36 indicates that the site will include green buffers and ecological enhancement corridors, ensuring built development excludes the European site (see **Appendix F**).	The Regulation 19 Interim HRA Appropriate Assessment (AA)[72] concluded no adverse impacts on the site integrity of any European site due to a change in water quality or water quantity, or urbanisation effects as a result of the MLP either alone or in-combination. The Interim HRA has however not been able to reach a conclusion regarding adverse air quality and recreational impacts upon the site integrity of the North Kent Marshes European sites (Medway Estuary and Marshes SPA/Ramsar, Thames Estuary and Marshes SPA/Ramsar and Swale SPA/Ramsar) and the North Down Woodlands SAC. Further air quality modelling work and a final Hoo Peninsula Strategic Environmental Programme will be evaluated to inform a full AA of air quality and recreational impacts. **Therefore, at the time of writing, the effect of the MLP on European sites is uncertain.**
 **Threats or pressures to nationally designated biodiversity sites** Two allocated sites (HHH12 and HHH36) partially coincide with the Medway Estuary and Marshes SSSI. Additionally, five allocated sites (SMI6, AS28, GN15, GN6 and SR51) lie adjacent to SSSIs. Development at these seven sites could give rise to direct impacts on special features of the SSSIs.	• Policy **S2** promotes the conservation, restoration and enhancement of MCZs, NNRs, and SSSIs, ensuring that significant harm to biodiversity would be avoided. It also sets out the emerging Hoo Peninsula Strategic Environmental Programme which will provide a strategic approach to protecting designated sites including Chattenden Woods and Lodge Hill SSSI, and the Medway Estuary and Marshes SSSI. • Policy **S5** encourages the use of GI to provide a high level of protection for nationally designated sites.	Policy S2 will help to mitigate adverse impacts on nationally designated biodiversity sites arising from the majority of development proposed in the MLP. However, the policies are not anticipated to fully mitigate adverse effects on SSSIs where proposed sites coincide with, or are located directly adjacent to, SSSIs, or development within 400m of Chattenden Woods and Lodge Hill SSSI. These sites should be subject to specific consultation with Natural

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

Identified effects on biodiversity, flora and fauna	Mitigating MLP policies	Summary of residual effect
Sites HHH5 and SR14 lie within 400m of Chattenden Woods and Lodge Hill SSSI. This SSSI is designated for its ancient woodland and rare grassland habitats, supporting important invertebrate populations and a significant portion of the UK's population of Nightingales – ground-nesting birds that are vulnerable to predators and habitat disturbance. A further 120 allocated sites are located within IRZs, where consultation with Natural England will be required to ensure any potential adverse effects on nearby SSSIs are identified and addressed. Seven allocated sites are located in close proximity to High Halstow NNR, and three in proximity to North Kent Woods and Downs NNR, and could result in increased recreational pressures. Some 12 allocated sites lie adjacent to the Medway Estuary MCZ and could result in adverse effects on the marine habitats.	• Other policies, including Policy **T10 (Gypsy, Travellers and Travelling Showpeople)** and **Policy T22 (Marinas and moorings)** require development proposals to be located away, or have consideration for nationally designated sites. • Accompanying masterplan information for several allocated strategic sites located within SSSI IRZs indicates that the proposed development will include GI and ecological enhancements such as green corridors and woodland planting. These measures could help to reduce adverse effects on the SSSIs (see **Appendix F**).	England, some of which will be addressed as the Hoo Peninsula Strategic Environmental Programme develops. Based on available information at the time of writing, there is potential for the MLP to result in a residual adverse effect on SSSIs within the Plan area. **In line with the precautionary principle, at the time of writing, a potential long-term significant adverse effect on nationally designated biodiversity sites, including the fauna and flora they support, is identified.** **The Nightingale population at Chattenden Woods and Lodge Hill SSSI is nationally important and warrants particular attention and caution in the planmaking process.**
 **Threats or pressures to locally designated and non-statutory biodiversity sites** Adverse impacts on locally designated sites due to development proposed in the MLP could potentially include direct impacts such as habitat loss and/or indirect impacts such as increased recreational disturbance and water or air pollution. One allocated site (Site RWB2) is located adjacent to 'Baty's Marsh' LNR. Additionally, 11 allocated sites are located in close proximity to a LNR. Three allocated sites (Sites CHR14, GS2 and LW8) coincide with LWSs, a further three sites (Sites HW3, LW4 and LW7) are located adjacent to an LWS.	• Policy **S2** promotes the conservation, restoration and enhancement of LNRs, LWSs and ancient woodland, by recognising the protection given by these designations and non-statutory sites, ensuring it can be demonstrated that significant harm to biodiversity would be avoided. • The Kent and Medway Local Nature Recovery Strategy is currently in progress, which is likely to encourage opportunities to improve habitat connectivity.	The MLP policies will be likely to mitigate adverse impacts arising from development proposals which are situated in close proximity to locally designated and non-statutory biodiversity assets. However, the MLP policies will not be expected to fully mitigate adverse effects on sites which coincide with LWSs (Sites CHR14, GS2 and LW8), or for sites which are directly adjacent to a LNR or LWS, where there is potential for direct habitat loss or degradation of the habitats associated with the designations. **A potential long-term significant effect on locally designated and non-statutory biodiversity sites is identified.**

Identified effects on biodiversity, flora and fauna	Mitigating MLP policies	Summary of residual effect
4  **Fragmentation of the ecological network** The majority of allocated sites (76) are located on previously undeveloped land and/or contain some land with potential environmental value where there is a risk of habitat loss or fragmentation. Some 19 allocated sites coincide with priority habitat, including deciduous woodland, mudflats, coastal saltmarsh and traditional orchard. Four allocated sites (HHH12, LW4, LW6 and LW8) coincide with ancient woodland, and a further 14 sites lie adjacent or in close proximity to ancient woodland. Eight allocated sites coincide with open mosaic habitats. Potential impacts associated with loss of habitats includes: • **Direct impacts**: Permanent loss of priority habitat in short term. • **Secondary impacts**: Such as reduced habitat connectivity and increased fragmentation, with increased fragility of habitats. • **Indirect effects**: Reduced ecological coherence.	• Policy **S2** promotes the conservation, restoration and enhancement of ancient woodland. In addition, development proposals will provide a measurable net gain of 10% Biodiversity Net Gain (BNG) in line with national requirements. The Kent and Medway Local Nature Recovery Strategy is currently in progress, which is likely to encourage opportunities to improve habitat connectivity. • Policy **S5** encourages the use of green infrastructure to provide protection for locally designated sites and non-statutory biodiversity sites. • Policy **T1 (Promoting high quality design)** protects existing trees and aims to establishes new landscape features that promote biodiversity. • Site Policy **SA7 (Capstone Valley)** requires a GI strategy to inform allocations, that will include buffers around ancient woodland and new street trees. • The accompanying masterplan to two allocated strategic sites (LW6 and LW8) indicates that ancient woodland and priority habitats will be retained as part of the development proposals (see **Appendix F**).	The MLP policies are likely to enhance habitat connectivity and strengthen the resilience of ecological and GI networks against current and future pressures. They support the conservation and expansion of GI coverage, along with the creation of new habitats, providing opportunities to improve connections between biodiversity features. Additionally, the policies promote the principles of the emerging Kent and Medway Local Nature Recovery Strategy. **Overall, a long-term positive impact on green infrastructure opportunities is anticipated.**

9 Climatic factors

9.1 Baseline

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

9.1.2 The Climate Change Act 2008[73] is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide (CO_2) and other GHGs are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements.

9.1.3 The Committee on Climate Change (CCC) report 'Net Zero – The UK's contribution to stopping global warming'[74] recommended new emission targets: reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050. The CCC's latest progress report[75] discusses the need for further measures to be implemented to ensure the UK meets the next target of reducing emissions in 2030 by 68% compared to 1990 levels. See **Appendix A** for more details of relevant PPPs.

9.1.4 Medway Council declared a Climate Emergency in April 2019[76].

Renewable energy

9.1.5 One strategy to combat GHG emissions is to reduce the quantity of energy produced via fossil fuel led energy production[77]. Over the last four years there has been an increase in the volume of energy generated through renewable sources within Medway (see **Table 9.1**) and decreasing reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn would reduce Medway's contributions towards the causes of climate change.

***Table 9.1:** Total renewable energy generation in Medway between 2020 and 2023[78]*

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

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

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

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

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

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

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

9.1.6 The layout and design of development can have benefits to sustainability and reducing contributions to climate change. The MLP could potentially help encourage the development of more energy efficient homes to help reduce the overall carbon emissions of Medway, such as Eco Houses, Zero Carbon Homes and Passivhaus[79].

Carbon emissions

9.1.7 The requirement to improve the energy efficiency of homes stems from the legal requirements to reduce CO_2 emissions set out in the Climate Change Act 2008 and the government's Net Zero Strategy 2021. The Net Zero Strategy sets out to reduce GHG emissions by 55% by 2025, 68% by 2030, 78% by 2035 and 100% by 2050[80]. It will therefore be an important role of the MLP to encourage sustainable development and construction and support low carbon energy sources. The Medway Refreshed Climate Change Action Plan 2022[81] will look to address these issues.

9.1.8 The largest source of CO_2 emissions in Medway is from domestic related emissions, followed closely by transport related emissions[82]. It is likely that residential development proposed within the MLP will result in an associated increase in domestic emissions, as well as an increase in the number of vehicles on the road in the Plan area with a consequent increase in transport emissions, contributing to the Greenhouse Effect and exacerbating anthropogenic climate change.

9.1.9 Around 1 in 10 tonnes of the UK's total GHG emissions are embodied emissions, totalling 64 million tonnes of CO_2 a year[83]. Local Plans should consider embodied carbon, which is present throughout the whole lifecycle of a building or infrastructure (see **Figure 9.1**).

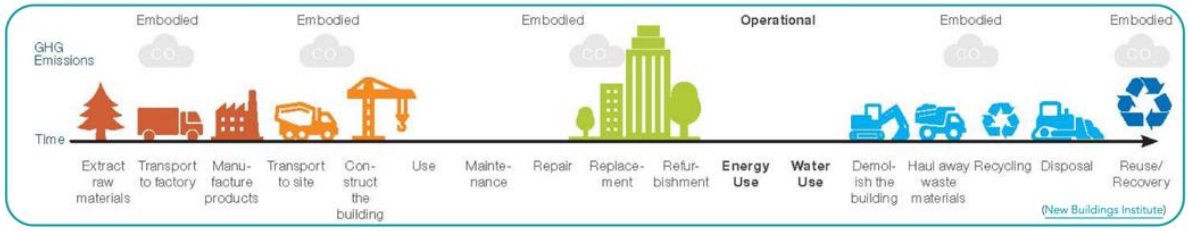


***Figure 9.1:** Embodied and operational GHG emissions[84]*

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

[80] Ibid

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

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

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

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

Flooding and extreme weather events

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

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

9.1.12 Coastal squeeze[85] poses a significant challenge for Medway, where rising sea levels driven by climate change force coastal habitats to migrate inland to avoid submersion. Coastal habitats play a critical role in providing essential ecosystem services such as flood protection, carbon sequestration, and support for biodiversity; all of which are at risk from coastal squeeze. To address these concerns, the Medway Estuary and Swale (MEAS) flood and coastal risk management strategy[86] focuses on managing the coastline to protect people, properties, protected habitats, and agricultural land over the next 100 years.

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

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

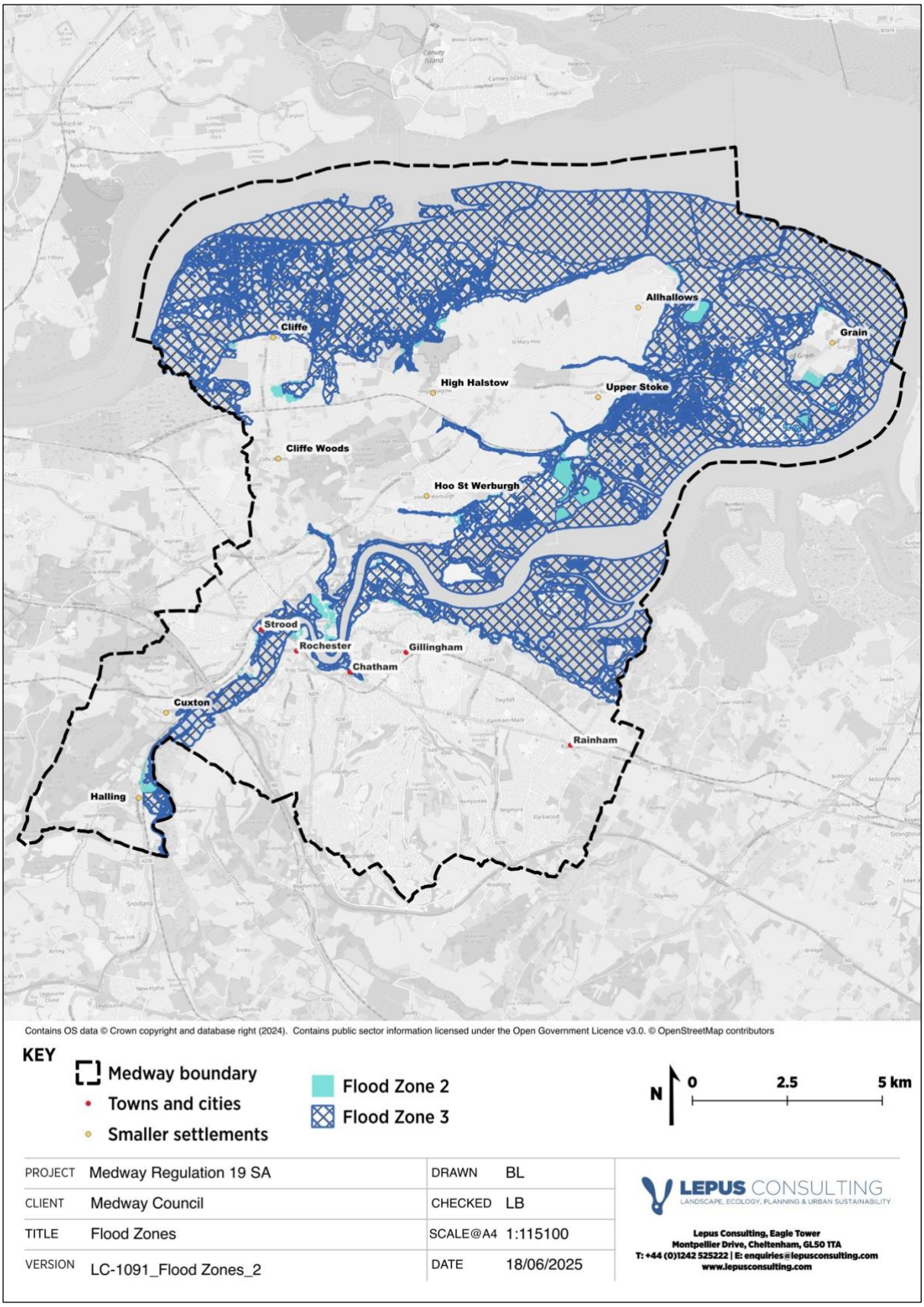


Figure 9.2: *Flood Zones within Medway*

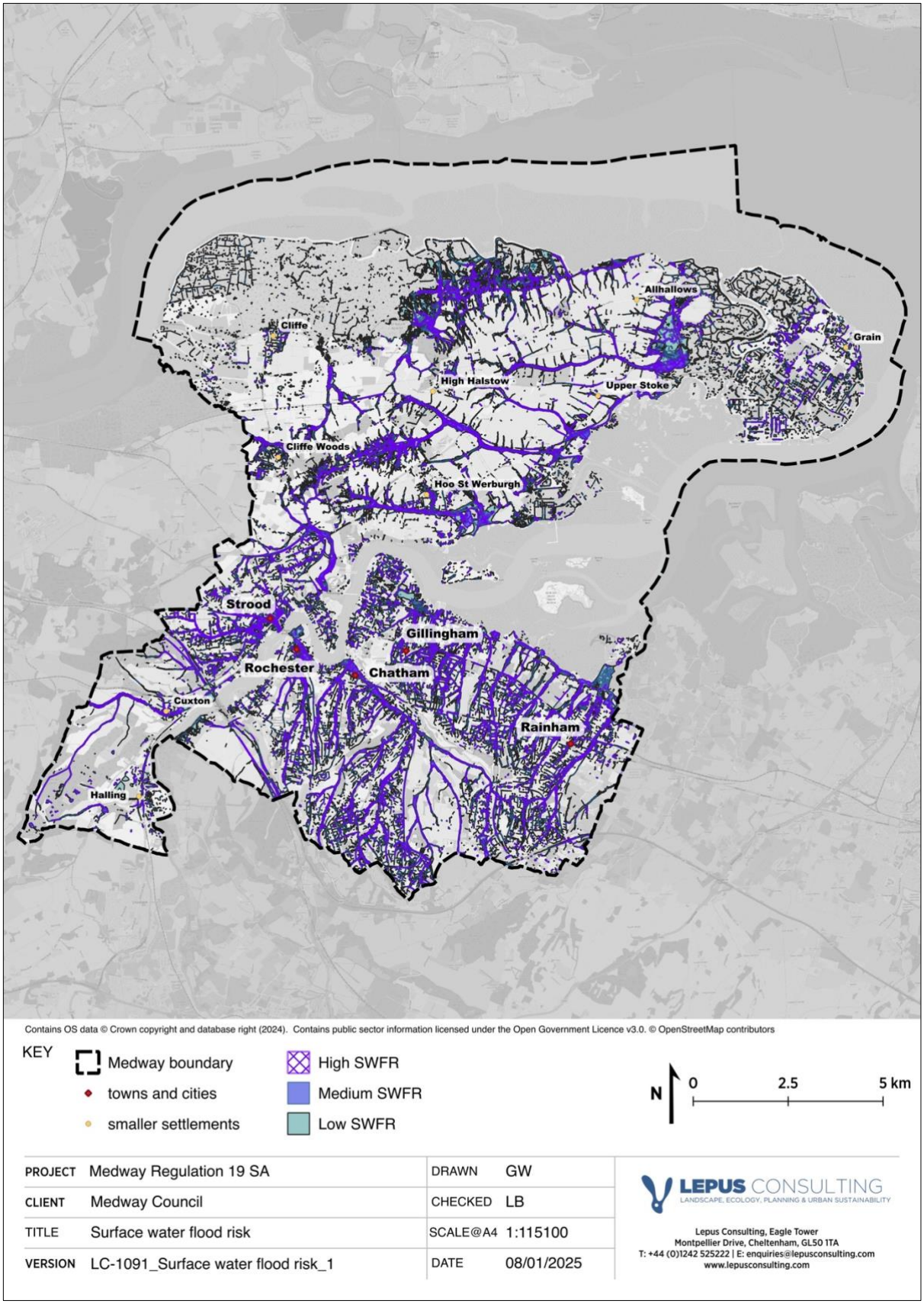


Figure 9.3: *Surface water flood risk within Medway*

Green Infrastructure

9.1.14 Natural England's GI Framework[87] seeks to ensure that LPAs and developers can meet the requirements in the NPPF to consider GI in local plans and in new development in a way that will recognise and maximise the multi-functional benefits of GI. GI has many benefits including, human health and wildlife value[88] and can play an important role in helping urban areas adapt to climate change, by filtering airborne pollutants, providing shade and local cooling and reducing surface water runoff[89].

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

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

Key issues for climatic factors include:

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

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

⇒ GI needs to designed, enhanced and expanded to maximise ecosystem services and climate resilience.

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

9.2 Evaluating the effect of the MLP on climatic factors

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

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

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

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

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

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

Identified effects on climatic factors	Mitigating MLP policies	Summary of residual effect
 **Risk of fluvial and tidal flooding (present and future)** Development within Flood Zones 2 or 3 will locate site end users in areas at risk of fluvial flooding, may increase the risk of damage to property and human health in the immediate area, and/or contribute to exacerbation of flood risk in surrounding areas. The majority of allocated sites lie in Flood Zone 1; however, 32 sites coincide with some areas of Flood Zone 3, and three sites with Zone 2. Notably, ten of these sites (SNF38, SNF31, SNF34, HHH32, CCB8, SNF24, SNF23, SNF30, SNF35 and CCB27) lie wholly within Zone 3, and a further 14 sites where more than 50% of the site area lies within Zone 3.	• Policy **DM1 (Flood and water management)** seeks to minimise flood risk through providing site-specific flood risk assessments by carrying out Sequential and Exception testing, and through providing flood risk management infrastructure where required. This includes locating development in areas of low flood risk, maintaining flood risk infrastructure, and contributing towards to EA's flood risk management programme. • Policy **S5 (Securing strong green and blue infrastructure)** encourages the use of GI to manage flood risk and adapt to the impacts of climate change. • Both Policy **T28 (Existing open space, outdoor sports and play spaces)** and Policy **DM21 (New open space, outdoor sports and play spaces)** encourage the use of well-managed open spaces to help mitigate flood risk. • Site Policy **SA13 (Frindsbury Peninsula Opportunity Area)** highlights the emerging Planning Framework that will guide development in the area including delivery of strategic flood risk infrastructure.	Allocated sites that did not pass the Sequential Test[90] with regard to fluvial/tidal flood risk have been considered in more detail within the Level 2 SFRA[91], which includes application of the Exception Test. The SFRA includes a summary of required actions to ensure that development will be safe and consistent with national policy. **Subject to achieving the recommendations set out in the Level 2 SFRA, including completion of further site-specific flood risk assessments, it is likely that the plan will have a negligible effect on fluvial/tidal flooding.**
 **Surface water flood risk** Development in areas of surface water flood risk may lead to safety implications for site end users, and further exacerbate flood risk in the surrounding area. Some 83 allocated sites coincide with varying extents of surface water flood risk, including 34 sites which coincide with areas of high risk.	• Policy **DM1** seeks to minimise SWFR through providing site-specific flood risk assessments and flood risk management infrastructure. This includes preparing Surface Water Drainage Strategies including the implementation of SuDs which replicate greenfield runoff rates. • Policy **S5** encourages the use of GI to manage SWFR and includes the implementation and management of SuDs. • Policies **T28** and **DM21** both encourage the use of well-managed open spaces to help mitigate surface water flood risk. • The accompanying masterplan information for some strategic sites (HHH26, HHH36, LW8, SMI6 and SNF3) indicate that SuDS, GI and surface water drainage systems will be implemented.	Allocated sites that did not pass the Sequential Test with regard to SWFR have been considered in more detail within the Level 2 SFRA, which includes application of the Exception Test. The SFRA includes a summary of required actions to ensure that development will be safe and consistent with national policy. **Subject to achieving the recommendations set out in the Level 2 SFRA, including completion of further site-specific flood risk assessments, it is likely that the plan will have a negligible effect on SWFR.**

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

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

Identified effects on climatic factors	Mitigating MLP policies	Summary of residual effect
3 **Reduced viability of flood defences** In line with EA advice[92], development within 20m of the toe of a proposed/existing flood defence is considered unlikely to be able to safeguard the viability of future flood defences and has potential to increase future flood risk in the Plan area. Some 14 allocated sites coincide or are within 20m of the toe of a proposed/existing flood defence.	• Policy **DM1** states that *"development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted unless it can be suitably mitigated".* This includes continued inspection, maintenance, repair and replacement of the existing flood defences. • Site Policy **SA4 (River Waterfront)** outlines required flood mitigation and/or a flood defence wall to enable delivery of allocated sites in the waterfront area of north Gillingham. • The accompanying masterplan for Site HHH36 includes the provision of a green buffer to the existing flood defence, ensuring that no built development occurs within 20m of the flood defence (see **Appendix F**).	The MLP policies will be expected to protect future and existing flood defences from development and ensure delivery of new defences where required as part of the MEAS strategy[93]. **There is anticipated to be an overall negligible effect associated with development proposed in the MLP on the viability of flood defences.**
4 **Increased GHG emissions** The proposed development of 21,194 homes and a significant amount of new employment floorspace within Medway will be likely to increase GHG emissions to some extent through increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions, and the production and use of materials during construction / release of embodied carbon associated with redevelopment sites. This impact will be expected to contribute towards cumulative effects which exacerbate global climate change issues such as sea level rise and extreme weather events.	• Policy **S1 (Planning for climate change)** ensures that development proposals will include opportunities for adaptation to, and the mitigation of climate change to progress towards achieving net zero carbon in Medway by 2050. The policy includes measures to promote effective spatial planning, use of renewable and low carbon technologies and design, delivery of green infrastructure, and management of water resources and flood risk. • The criteria of Policy S1 are underpinned by Policy **DM3 (Air quality),** Policy **DM6 (Sustainable design and construction),** Policy **S25 (Energy supply)** and Policy **T41 (Heat networks),** collectively aiming to reduce Medway's carbon footprint. • Site Policy **SA8 (Hoo St Werburgh and Chattenden)** requires potential for a district heating network to be explored via the strategic development framework and masterplan. • Several site policies encourage development to re-use or renovate existing buildings rather than demolishing and rebuilding, to minimise embodied carbon emissions.	Although the relevant MLP policies will be expected to have a positive impact in helping to reduce GHG emissions, particularly in regard to energy efficient design and low carbon sources, these measures are not expected to fully mitigate the impacts associated with the large quantum of growth expected from the Plan. **An increase in GHG emissions as a consequence of the proposed development is expected to be a medium-term significant adverse effect, pending effective implementation of net-zero commitments.**
5	• The **Spatial Development Strategy** encourages development proposals to	Although there may be some loss of previously undeveloped land

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

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

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

10 Cultural heritage

10.1 Baseline

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

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

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

Designated features

10.1.4 The Medway Heritage Asset Review[94] states that there are 720 relevant entries in the national list of buildings of special architectural or historic importance within the Plan area:

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

10.1.5 Medway has 24 Conservation Areas, seven of which have published Conservation Area Appraisals[95]. Since 2008, Historic England has released an annual Heritage at Risk Register, which in Medway includes 16 historic assets[96]. Listed Buildings are shown on **Figure 6.1**, with other designations shown on **Figure 6.2**.

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

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

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

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

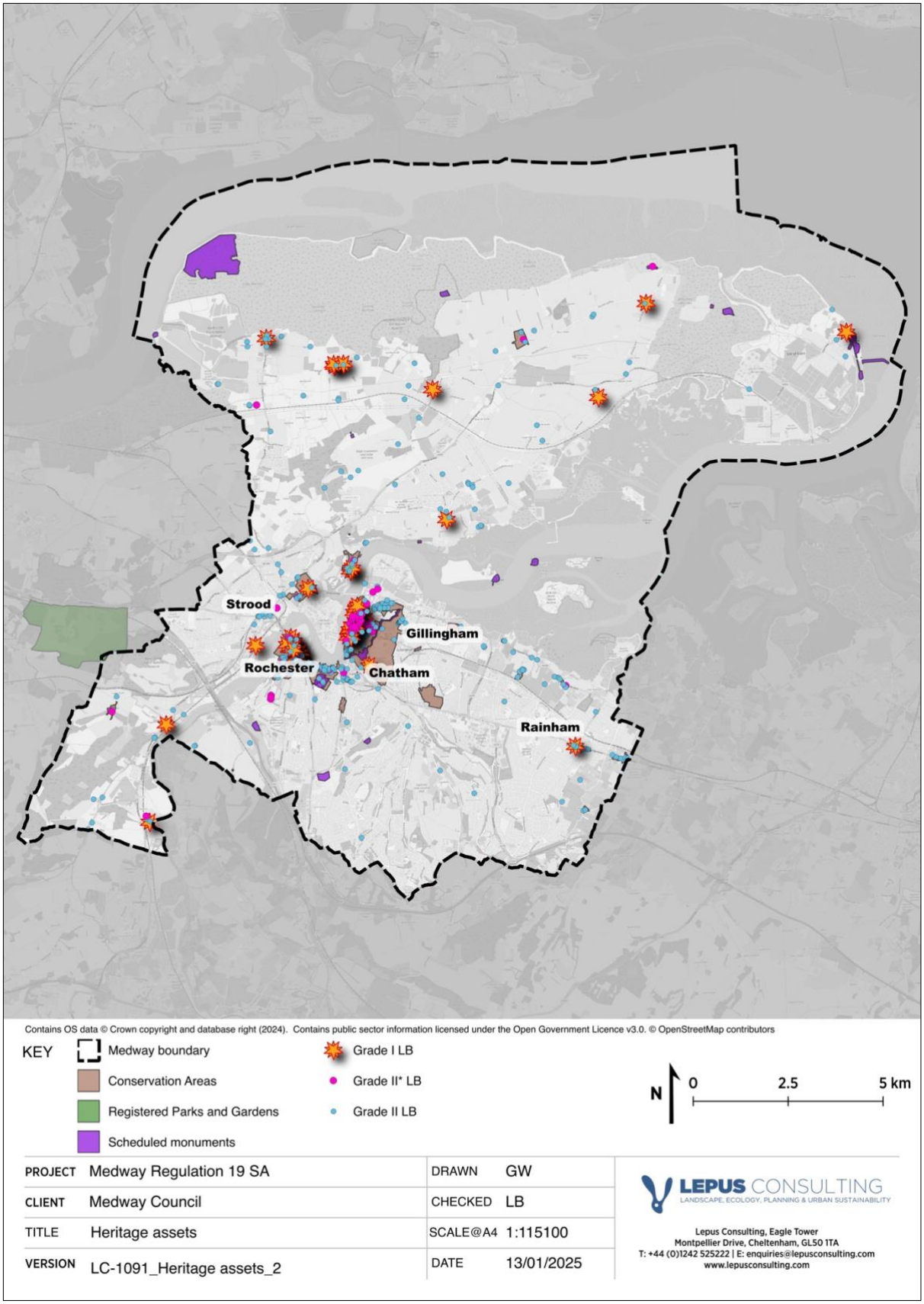


Figure 10.1: *Heritage assets within Medway*

Non-designated features

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

10.1.8 Historic England advocate seeking opportunities for delivering heritage-led regeneration[97], creating, revealing or enhancing local distinctiveness, encouraging the use of traditional building skills, and promoting climate change resilience and innovative reuse of historic buildings where appropriate. Engaging with and celebrating cultural heritage also provides a number of opportunities to benefit wellbeing, social inclusion and equality[98].

10.1.9 In November 2023, Medway was selected by The National Lottery Heritage Fund as one of nine locations set to receive a share of £200 million in funding under the 'Heritage Places' initiative[99]. The scheme aims to respond to local needs, supporting places to use heritage to build pride in place, inspire local communities and power regeneration.

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

Key issues for cultural heritage include:

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

⇒ There are numerous historic buildings that are listed.

⇒ Medway includes heritage assets identified as heritage at risk.

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

10.2 Evaluating the effect of the MLP on cultural heritage

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

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

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

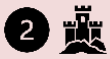
[98] Historic England (2018) Wellbeing and the Historic Environment. Available at: https://historicengland.org.uk/images-books/publications/wellbeing-and-the-historic-environment/wellbeing-and-historic-environment/ [Date accessed: 08/01/25]

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

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

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

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

Identified effects on cultural heritage	Mitigating MLP policies	Summary of residual effect
 **Alteration of Medway's historic character, including the character and/or setting of Conservation Areas** Development within or in proximity to a CA has the potential to adversely impact the character and special architectural or historic interest of the CA and/or its setting. Some 15 allocated sites wholly or partially coincide with a CA. Five allocated sites (CCB4, FP12, FP25, SR48 and SR53) are located adjacent to a CA. A further seven allocated sites are located within close proximity to a CA.	• Policy **S8** supports development that "*positively contributes to local distinctiveness and character".* • Policy **S9 (Star Hill to Sun Pier)** focuses on conserving and enhancing assets within the identified Heritage Action Zone (HAZ)[101]. • Policy **DM9** promotes high quality design, and requires compliance with relevant published CA Appraisals and design guidance. • 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 **T1 (Promoting high quality design)** encourages developments which respond to the character and appearance of their settings. • Site Policy **SA2 (Heritage-led Sites)** will ensure sensitive redevelopment of sites within Star Hill to Sunpier CA and Chatham Historic Dockyard CA. • Site Policy **SA13 (Frindsbury Peninsula Opportunity Area)** requires development to have regard to the setting of nearby CAs including Frindsbury and Manor Farm.	Adverse impacts on the character and setting of CAs are anticipated to be mitigated through various MLP policies. **The MLP will be expected to help avoid or mitigate the potential for significant impacts on 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.**

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

11 Human health

11.1 Baseline

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

11.1.2 Key PPPs include Public Health England's Strategy for 2020–2025[102] which sets out priorities within the health system including a focus on addressing health inequalities. See **Appendix A** for more details of relevant PPPs.

Air quality

11.1.3 As discussed in detail within **Chapter 7**, air pollution is a significant concern internationally, nationally and locally, with an average of 6.4% of mortality in Medway being attributed to particulate air pollution[103].

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

Health and wellbeing

11.1.5 Estimates of personal wellbeing in the UK are published by the ONS annually, with scores for anxiety, happiness, life satisfaction, and feeling that life is worthwhile. Overall scores are based on surveying a representative sample of the population and are scored out of 10 (e.g. for happiness 0 is 'not at all happy' and 10 is 'completely happy'). Medway recorded a 7.3 for overall happiness in 2023[104].

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

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

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

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

Table 11.1: *Health statistics for Medway in comparison with the regional and national average (2023)*[105]

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

Healthcare facilities

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

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

11.1.9 New housing developments can increase demand on local healthcare services. The government provides guidance for GP capacity for large scale developments[106] as well as resources for planning and designing healthier places[107]. The GP-to-patient ratio in Medway is worse than the national average, and some surgeries are not accepting new patients, meaning that residents may not be registered with the most local surgery.

Green spaces and natural habitats

11.1.10 In line with the NPPF, LPAs should seek to promote social interaction, create communities which are safe and accessible, and provide a range of GI and sports facilities. Opportunities to experience a diverse range of natural habitats and recreational spaces is known to be beneficial for physical and mental health. Good access to such areas can reduce stress, fatigue, anxiety and depression[108], as well as physical health indicators such as reduced rates of obesity and type 2 diabetes. Impacts of restricted access to the natural environment are particularly significant for lower socio-economic groups.

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

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

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

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

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

Key issues for human health include:

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

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

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

11.2 Evaluating the effect of the MLP on human health

11.2.1 Human health has been primarily considered in the SA process under SA Objective 8 'Health and Wellbeing' which seeks to safeguard and improve physical and mental health via ensuring sustainable access to healthcare and encouraging healthy lifestyles.

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

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

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

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

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

12 Landscape

12.1 Baseline

12.1.1 Landscape can be described as comprising natural, cultural, social, aesthetic and perceptual elements, this includes flora, fauna, soils, land use, settlement, sight, smells and sound[109]. The link between landscapes and a range of other aspects can be provided with a close focus on GI provision, with multi-functional benefits. In this respect, policies advocate the provision of open space, green networks and woodland as opportunities for sport and recreation, creating healthier communities as well as supporting and enhancing biodiversity. National Design Guidance[110] advocates well-designed places that are functional, attractive and provide a sense of safety, inclusion and community cohesion. See **Appendix A** for more details of relevant PPPs.

Landscape Character

12.1.2 Landscape Character Assessments help to identify key characteristics that together can create sense of place and the unique character of an area. The Medway Landscape Character Assessment (2024)[111] identified eight landscape character types (LCTs), based on common geology, topography, land use and cultural pattern, which have been sub-divided into 34 landscape character areas (LCAs) with recognisable local identity. For each LCA, key characteristics, sensitivities and values as well as guidance and recommendations for development management have been identified; these aspects have been used to inform the SA.

Landscape Sensitivity

12.1.3 The Draft Hoo Landscape Sensitivity and Capacity Study (February 2019)[112] has been produced to help inform the decision making regarding the potential development of an extension to Hoo St Werburgh. The study has identified ten land parcels within the Hoo Peninsula, and each parcel has been assessed for its sensitivity, value and capacity. According to the study:

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

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

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

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

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

its character. Those parcels with a low capacity outcome are considered most able to absorb development; those with a high capacity outcome are considered least able to absorb development.

Kent Downs National Landscape

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

12.1.5 The Kent Downs Management Plan 2021-2026[113] sets out the future vision of the landscape and provides the strategies to be implemented that will ensure the special character of the landscape is recognised, valued and enhanced by the community for present and future use. The Kent Downs Landscape Character Assessment Update (2020)[114] provides a description of the character and sensitivities of land within the NL and recommendations to help guide planning and development in each area.

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

Country Parks

12.1.7 Country parks (CP) in Medway include 'Ranscombe Farm' (within the NL), 'Capstone Farm' (within the setting of the NL) and 'Riverside'. 'Shorne' Country Park to the east of Gravesham also draws visitors from Medway. CPs are designated under the Countryside Act 1968[115], which allows local authorities to establish and manage CPs to provide opportunities for informal recreation in the countryside. While not as strictly protected as national parks or nature reserves, country parks often have management plans to regulate their use, preserve the landscape, and ensure public access. Medway's CPs, especially Ranscombe Farm and Capstone Farm, have a geographic relationship with the Kent Downs NL and serve as important green buffers, helping to maintain ecological corridors.

Green Belt

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

12.1.9 The Green Belt is intended to[116]:

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

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

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

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

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

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

12.1.10 A Green Belt Review (2025) has been prepared by the Council to assess if land is meeting the purposes with the use of assessment criteria in national policy (including 'grey belt'[117]), and to test whether exceptional circumstances justify a revision to Green Belt boundaries in Medway. The review found that existing Green Belt boundaries should be maintained largely as they stand, with minor amendments to take account of boundary anomalies and the release of land to the west of Strood that has been identified as grey belt.

[117] MHCLG (2025) PPG: Green Belt. Assessing Green Belt to identify grey belt land. Available at: https://www.gov.uk/guidance/green-belt#assessing-green-belt-to-identify-grey-belt-land [Date accessed: 20/06/25]

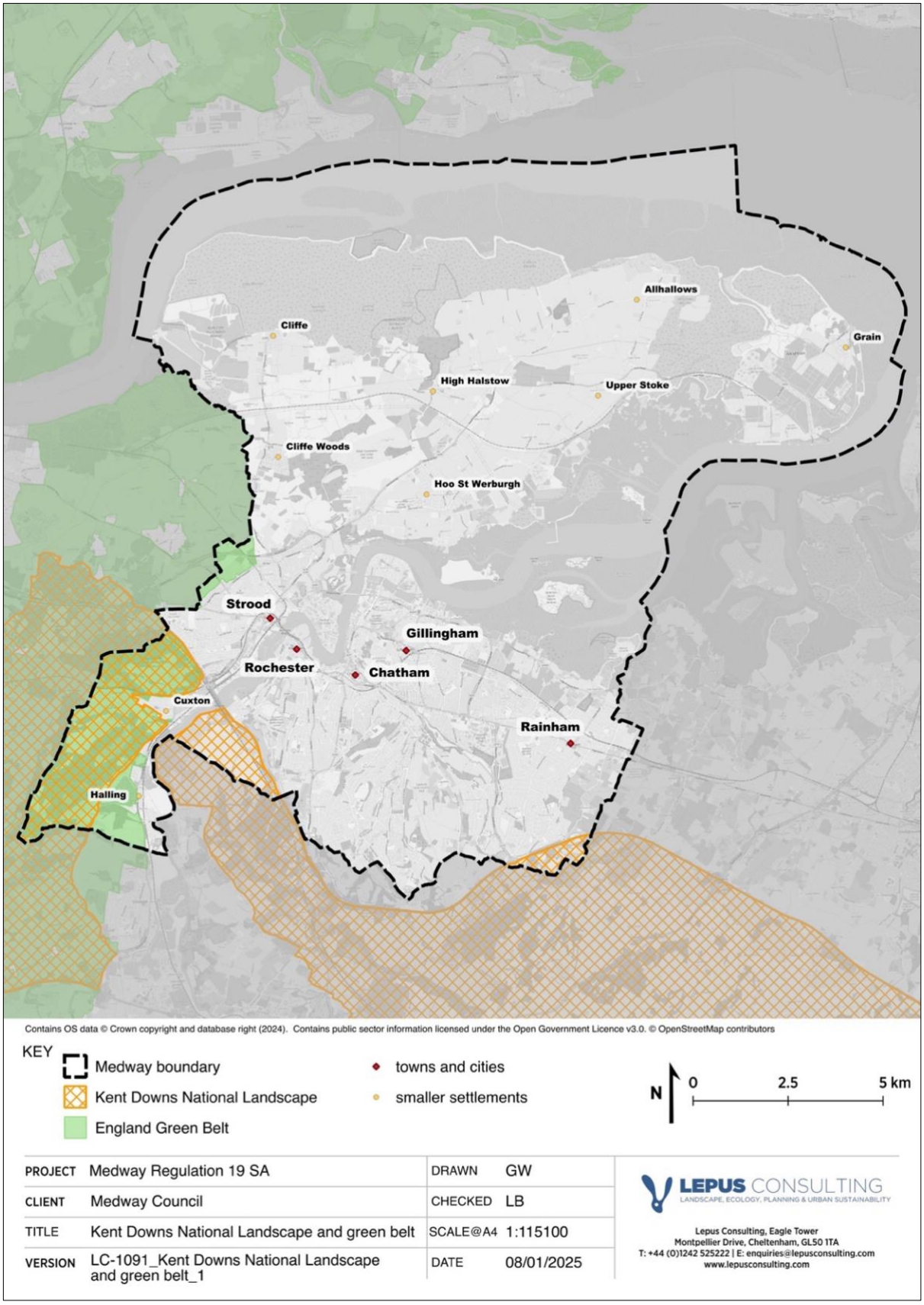


Figure 12.1: *Kent Downs National Landscape and areas of green belt within Medway*

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

Key issues for landscape include:

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

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

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

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

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

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

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

12.2 Evaluating the effect of the MLP on landscape

12.2.1 Landscape has been primarily considered in the SA process under SA Objective 4 'Landscape and Townscape' which promotes the conservation, enhancement and management of the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.

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

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

Identified effects on landscape	Mitigating MLP policies	Summary of residual effect
1  **Threats or pressures to the Kent Downs National Landscape and country parks** Some 18 allocated sites lie in close proximity to the Kent Downs National Landscape (NL), where development could result in adverse impacts on views or the setting of the designated landscape. Although Country Parks (CP) are not nationally designated landscapes in themselves, Sites LW6 and LW8 are located adjacent to Capstone Farm CP which forms a green link towards the Kent Downs NL. A further nine sites lie close to a CP. Development at these 11 sites could result in adverse effects on views and the	• Policy **S4 (Landscape protection and enhancement)** requires development proposals to demonstrate how they respond to key sensitivities and qualities of the surrounding landscape, including the Kent Downs National Landscape. • Policy **S6 (Kent Downs National Landscape)** seeks to ensure developments within or in the setting of the National Landscape contribute to conserving and enhancing its character. This includes Ranscombe Farm Country Park (within the National Landscape) and may also apply to Capstone Farm Country Park, due to its close proximity. • Policy **T1 (High Quality Design and Amenity)** will be expected to ensure development is	Various MLP policies seek to protect nationally designated landscapes, specifically Policy S6. A range of plans, programmes and legislation including the NPPF, affords protection to NLs in line with their significance. **The MLP will be expected to help avoid or mitigate the potential for significant effects on the Kent Downs NL arising from proposed development. There is potential for allocations in the Capstone Valley to alter the setting of the NL to some extent, that may be allieviated through a careful landscape-led mitigation approach. In the absence of a landscape sensitivity or**

Identified effects on landscape	Mitigating MLP policies	Summary of residual effect
setting of the nearby CPs, and may also have implications for the setting of the NL in some locations.	appropriate to its surroundings and informed by LVIAs.	**capacity assessment, it is necessary to adopt a precautionary approach and consider the potential for adverse impacts on the NL.**
 **Alteration of landscape character and sensitive / locally distinctive landscapes** Some 34 site allocations are anticipated to have adverse effects on the distinctive characteristics of the landscape as identified in the Landscape Character Assessment (2024)[118]. This includes sites within the 'Hoo Peninsula', 'Chattenden Ridge', 'Lower Rainham' and 'Cliffe Woods' LCAs. According to data from the Hoo Landscape Sensitivity and Capacity study[119], four allocated sites are located within areas of 'high' sensitivity and 'medium-high' / 'high' capacity, and nine sites are within areas of 'medium' sensitivity and 'medium' capacity. The landscape character in these areas is susceptible to change as a result of the proposed development.	• Policy **S4** requires development proposals to conserve and enhance Medway's local landscape character and distinctiveness, such as the North Kent Marshes. Development is encouraged in areas of lower landscape sensitivity and consider visual attributes of the landscape. • Policy **S5 (Securing strong green and blue infrastructure)** encourages development proposals to reflect local character through providing multi-functional GI. • Policy **S7 (Green Belt)** aims to maintain a strong Green Belt within Medway and would ensure that new development is only permitted within the Green Belt in exceptional circumstances. • Various site allocation policies seek to ensure development respects, and seeks opportunities to enhance, landscape character.	Due to the scale of development proposed, with a large proportion in previously undeveloped locations, these policies are not expected to fully mitigate the potential impacts on landscape character and a residual adverse effect is anticipated. **Alteration of the landscape character is a long-term and permanent significant adverse effect. There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan.**
 **Changes in views experienced by local residents and users of the PRoW network** The development proposed in the MLP has the potential to adversely affect informal high-quality viewing experiences that can be gained from the local PRoW network (including the North Downs Way National Trail). A total of 51 allocated sites coincide with or lie in close proximity to PRoW where there is potential for views to be altered.	• Policy **S4** requires development proposals to conserve and enhance Medway's local landscape character and distinctiveness, which will expect to protect landscape settings and key views. • Policy **S5** encourages development proposals to reflect local character through providing multi-functional GI, helping to protect a key aspect of Medway's distinctive character, setting and key views. • Policy **T1** encourages high quality place making that reflects key characteristics and sensitivities within Medway.	Whilst the MLP policies provide some proportionate protection of visual amenity and views, it is likely a residual impact will remain overall due to the large proportion of development in the Plan proposed on previously undeveloped sites and the location of a number of allocated sites with regard to the PRoW and existing properties. There is anticipated to be a cumulative adverse residual impact in relation to alteration of views.

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

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

Identified effects on landscape	Mitigating MLP policies	Summary of residual effect
Development proposed at 52 sites has the potential to adversely affect views from nearby existing properties, for example through introduction of built form into current areas of open space or low-lying land.	• Site Policy **SA1 (Chatham Town Centre and Surrounds)** and **SA5 (Strood District Centre and Surrounds)** require views analysis to inform development.	**Alteration of views is likely to be a long-term and permanent minor adverse effect.**
 **Increase urban sprawl and coalescence between settlements** Development at some 21 allocated sites was identified to result in potential adverse impacts associated with the urbanisation of the countryside, with new development extending settlement boundaries into the countryside. The proposed development at 16 allocated sites has the potential to reduce the separation between settlements and therefore increase the risk of coalescence and loss of identity of these settlements.	• Policy **S4** encourages development to retaining the intrinsic character and beauty of the countryside by containing urban sprawl and retaining the separation of settlements. • Policy **S7** aims to manage the openness of the countryside through preserving separation between settlements and containing urban sprawl, as part of the wider Green Belt. • The **Spatial Development Strategy** stipulates the importance of retaining separation between urban Medway and the Hoo Peninsula through providing strategic green corridors. • Policy **T1** seeks to retain urban/rural distinctiveness through containing settlements to avoid coalescence. • Site Policy **SA8 (Hoo St Werburgh and Chattenden)** requires a strategic landscape corridor to maintain separation of Hoo and Chattenden. • Site Policy **SA9 (High Halstow)** will avoid coalescence with nearby settlements through use of landscape buffers.	Various MLP seek to minimise impacts on the countryside and maintain separation between settlements through protection of the Green Belt and open countryside. However, due to the rural context within which some of the new development is situated, the Local Plan policies will not be expected to fully mitigate these impacts and a residual adverse effect is anticipated. **An increased risk of urbanisation of the countryside and coalescence is a long-term and permanent significant adverse effect.**

13 Population and material assets

13.1 Baseline

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

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

Population size and age structure

13.1.3 In Medway, the population was estimated at 286,800 in mid-2023, presenting a 1.5% increase from the previous year[120]. This rise in population is greater than the percentage increase for the south east region, and is expected to continue to rise over the course of the Plan period.

13.1.4 Medway had an average (median) age of 38 between 2011-2021 which is lower than the average age of England (40) and in the south east (41). In the same time period, the number of people in Medway aged between 50-64 rose to 19.6% while the number of residents between 16-19 fell to 3.9%[121].

Transport and accessibility

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

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

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

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

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

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

Indices of Multiple Deprivation

13.1.9 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England[122]. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households. In general, deprivation is spread across England, with approximately 61% of local authorities containing at least one of the most deprived neighbourhoods in England.

13.1.10 The IMD was last updated in 2019[123]. Medway has 163 LSOAs, with four of these being ranked among the 10% most deprived in England.

Housing

13.1.11 Government guidance requires LPAs to determine the local housing need figure for their area. The local plan preparation process should then test the deliverability of this housing need figure (see **Chapter 5**). At the time of writing, it is understood that there is a need for 24,540 dwellings in Medway for the 15-year Plan period, according to the latest Standard Method calculation (1,636 dwellings per annum)[124]. Local plans should provide a mix of housing types and tenures in order to meet the identified needs for the population, including affordable housing, and accessible housing options particularly for people aged 65 and over.

Economy and employment

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

13.1.13 Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers. A total of 154,500 (82.4%) people in Medway are economically active as of July 2023 – June 2024[125]. Although employment levels are high within Medway, unemployment levels are higher than the average across Kent.

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

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

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

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

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

Employment land

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

Education

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

Waste

13.1.17 In Medway and nationally, there is a need to increase the proportion of waste sent for reuse, recycling or compost and move away from the use of landfill for waste disposal. Government initiatives including the 25 Year Environment Plan[126] and Waste Strategy for England[127] highlight the importance of moving towards sustainable waste management and cutting down on hazardous waste and single-use plastics which lead to adverse implications for the health of people and the environment.

13.1.18 The proposed development within the MLP area and associated increase in residents will be expected to result in a significant increase in waste produced. It is assumed that new residents in the MLP area will have an annual waste production of approximately 377kg per person, in line with the national average[128].

Minerals

13.1.19 Medway Council is a Mineral Planning Authority and therefore is responsible for producing policies for management and to ensure steady and adequate supply of the minerals to meet local or regional needs[129]. The geology in Medway includes deposits of chalk, clay and sand and gravel, much of which is located on the Hoo Peninsula.

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

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

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

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

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

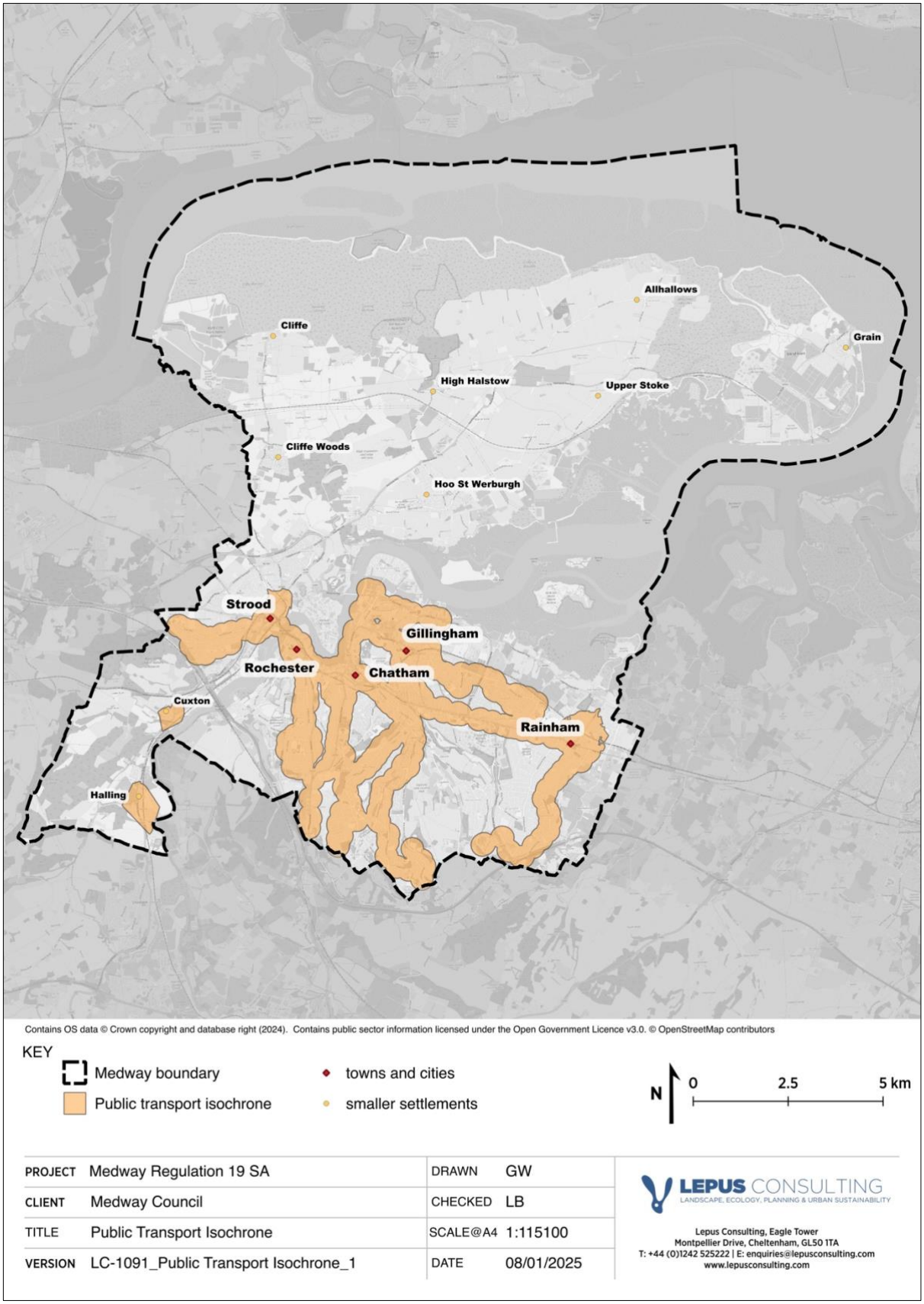


Figure 13.1: *High frequency public transport routes within Medway*

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

Key issues for population and material assets include:

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

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

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

⇒ Need to provide suitable housing for a growing elderly population

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

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

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

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

13.2.1 As noted in **section 13.1**, population and material assets is a broad topic and has been addressed under several SA Objectives, including: SA Objectives: 5 'pollution and waste', 6 'natural resources', 7 'housing', 8 'health and wellbeing', 10 'transport and accessibility', 11 'education' and 12 'economy and employment'. These objectives seek to create places where residents live a high quality of life for longer, are well educated and have the necessary skills to gain employment, as well as seeking to conserve Medway's natural assets such as mineral resources, and minimise waste.

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

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

Identified effects on population and material assets	Mitigating MLP policies	Summary of residual effect
1 **Provision of new homes** The MLP proposes the development of 21,194 new homes, which in combination with consented sites and windfall sites, will meet the locally identified housing need of 24,540 homes according to the latest	• Policy **T2 (Housing mix)** aims to meet identified housing needs, supporting the current and future requirements of the population in terms of housing type and size, as well as providing specialist accommodations for those with particular needs. • Policy **T3 (Affordable housing)** sets out the requirements to deliver affordable housing in urban and rural communities, to ensure that suitable residential development is provided to meet socio-economic needs.	In order to meet the identified housing need, the Local Plan proposes to deliver 21,194 new dwellings. Policies in the Plan set out the requirements to provide an appropriate mix of housing types and tenures, seeking to meet the needs of different groups, including older people. **A long-term positive effect on housing provision is anticipated.**

Identified effects on population and material assets	Mitigating MLP policies	Summary of residual effect
Standard Method calculation.	• The 14 site allocation policies detail the specific sites to be delivered across Medway over the Plan period.	
 **Provision of employment opportunities** The MLP proposes the development of sufficient employment land to meet the locally identified need of 204,000m^2 of industrial floorspace and 36,500m^2 of office floorspace according to the ELNA.	• Policy **S10 (Economic strategy)** will help to improve the range of employment sites within Medway, which is likely to compensate for any loss of employment floorspace. • Policy **S11 (Existing employment provision)** aims to safeguard existing employment sites from loss and redevelopment. • Policy **S15 (Town centres strategy)** supports retail and employment development at in-centre and edge-of-centre locations. • Site Policy **SA14 (Employment Sites)** allocates a range of employment uses to be delivered within the Plan period including 324,450m^2 at MedwayOne (former Kingsnorth Power Station).	The MLP provides sufficient land for a portfolio of employment sites that meet the needs of different types of businesses. The strategy recognises the potential to realise the strategic economic role of sites such as Grain and Kingsnorth in growing sectors. **A long-term positive effect on employment provision is anticipated.**
 **Sustainable access to, and pressure on, local services and facilities** Some site allocations lie outside of sustainable distances to public transport infrastructure, including 23 sites over 400m from bus stops providing regular services, and 41 beyond 1.2km from railway stations. Some 31 residential-led sites lie outside the 800m sustainable distance to primary schools and 35 sites over 1.2km to secondary schools. Some 37 sites are located over the 800m sustainable target distance to a local convenience / food store. Sustainable access to healthcare services is considered under **Chapter 11: Human Health**.	• Policy **DM17 (Grain Branch)** aims to safeguard land for potential a new railway station and will not permit development that may compromise new rail infrastructure in this area. • Policy **DM18 (Transport assessments, transport statements and travel plans)** requires all development proposals that will generate a significant amount of movement will be supported by a Transport Assessment or Statement, or commitment to provide one. • Policy **T26 (Accessibility standards)** requires all proposals to be accessible to a secondary school or social space via a 15-minute bus journey. • Policies including **DM15, T4, T5, T10, T27, S16** and **S17** all encourage development to be situated in areas accessible to public transport whilst encouraging co-location of services. This includes improving provision for bus links. • A number of site allocation policies include provision of bus routes, shops and safeguarded land for a potential new railway station at Site HHH22/HHH31.	The MLP policies are expected to improve access to local services and facilities for the majority of sites through providing improved transport networks, developer contributions to services and new service provision. Although access could remain limited within a number of rurally located sites, the implementation of Travel Plans is anticipated to help address this to some extent. **On balance, a negligible effect is identified for access to local services, provided that effective Travel Plans and monitoring of their effectiveness is in place.**

Identified effects on population and material assets	Mitigating MLP policies	Summary of residual effect
 **Waste generation** The proposed development of 21,194 homes and a significant amount of new employment floorspace will be expected to increase waste generation and have a potential adverse effect on the capacity of waste management facilities in the Plan area.	• Policies **T34 (Safeguarding of existing waste management facilities)** and **T35 (Provision of additional waste management capacity)** safeguard current waste infrastructure and increase its capacity for waste management. • Policy **T37 (Other recovery)** supports the provision of energy from waste facilities where waste cannot be reused or recycled. • Policy **DM23 (Waste prevention)** encourages design principles that minimise waste and locally produced and recycled resources.	The Waste Needs Assessment (WNA)[130] found sufficient capacity for recycling, composting, and inert waste, but a landfill shortfall for non-inert waste over the Plan period. The construction and occupation of new homes and businesses could 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.**
 **Sterilisation of mineral resources** Where non-minerals development coincides with an identified MSA, there is potential for sterilisation of the mineral resource, meaning the minerals will be inaccessible for potential extraction in the future. This is the case for six allocated sites (AS10, AS11, CCB35, SMI6, SNF31 and SR53).	• Policy **T30 (Safeguarding mineral resources)** will ensure development is permitted only where it would not intervene with current or potential extraction of valuable mineral resources. • Policy **T31 (Safeguarding of existing mineral supply infrastructure)** safeguards existing mineral supply infrastructure from development that may limit their operation. • The accompanying masterplan for Site SMI6 indicates that the MSA located within the site is to be retained for open space (see **Appendix F**).	The MLP policies, incuding T30 and T31, will be expected to ensure that potential impact on safeguarded minerals is avoided or minimised. **Overall, a minor positive effect on the conservation of mineral resources is likely.**

[130] 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]

14 Soil

14.1 Baseline

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

14.1.2 In accordance with paragraph 187 of the NPPF, it is important that planning policies recognise the potential for development to have an irreversible adverse (cumulative) impact on the finite stock of best and most versatile (BMV) agricultural land and natural capital. Avoiding the loss of BMV land is a priority as mitigation is rarely possible. The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as BMV land[131]. The grades are as follows:

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

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

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

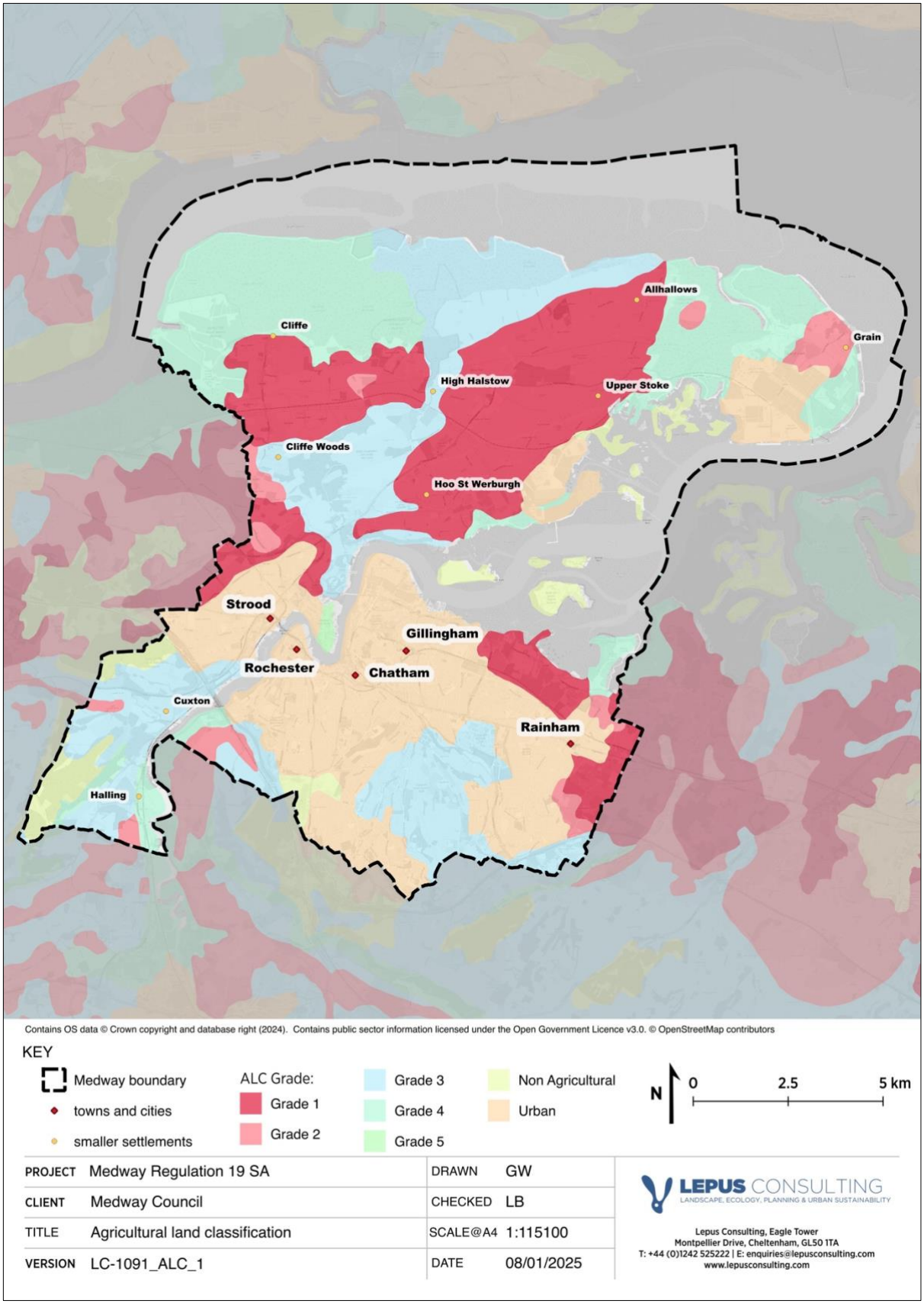


Figure 14.1: *Agricultural land classification within Medway*

Soil pollution and contaminated land

14.1.4 Soil pollution can refer to land which is contaminated by a range of pollutants including heavy metals, oils, chemicals and radioactive substances[132]. Land is legally defined as 'contaminated land' where substances have the potential to cause:

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

14.1.5 In accordance with the core planning principles of the NPPF[133], development on previously developed land will be recognised as an efficient use of land. Whereas, development proposals situated on previously undeveloped land are expected to pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.

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

Key issues for soil include:

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

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

14.2 Evaluating the effect of the MLP on soil

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

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

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

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

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

Identified effects on soil	Mitigating MLP policies	Summary of residual effect
 **Loss of soil resources** The construction and occupation of new buildings on previously undeveloped land will be expected to result in a direct loss of soil resource, with little or no scope for mitigation. Some 76 allocated sites are located wholly or partially on previously undeveloped land or land with potential environmental value. This includes 51 allocations which are situated upon land of ALC Grades 1, 2, or 3 which could potentially represent some of Medway's BMV agricultural land. Based on the indicative areas of these allocations, the MLP could result in the loss of up to c.1,064ha of previously undeveloped land, of which c.948ha is potential BMV land[134].	• The **Spatial Development Strategy** encourages development proposals to make use of PDL, locating development away from greenfield land with high value soil. • Policy **S4 (Landscape protection and enhancement)** aims to support the local nature recovery network and improve habitat connectivity, consequently areas of BMV soil. • Policy **S5 (Securing strong green and blue infrastructure)** will help to conserve and enhance the GI network, including BMV soil. • Policy **T14 (Rural economy)** supports employment development in the countryside that does not lead to significant loss of high-grade agricultural land and can demonstrate that locations of lower agricultural land value are not suitable. • New allotment provision within several site allocation policies (see **Appendix K**) will help to conserve high quality soils for food production.	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.**

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

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

15 Water

15.1 Baseline

15.1.1 National water policies are primarily driven by the EU Water Framework Directive (WFD), as translated into national law by the Water Framework Regulations 2003. Key objectives include improving the quality of rivers and other waterbodies to 'good' ecological status by 2027; considering flood risk at all stages of the plan and development process in order to reduce future damage to property and loss of life; and incorporating water efficiency measures into new developments. Key PPPs for the MLP area include: Thames River Basin District River Basin Management Plan (RBMP) (2022)[135], Medway Estuary and Swale (MEAS) Flood and Coastal Erosion Risk Management Strategy[136] and the South East Water Resource Management Plan (WRMP) 2020-2080[137]. See **Appendix A** for more details of relevant PPPs.

Water resources

15.1.2 Sewerage services and water supply across the majority of Medway are provided by Southern Water, with water supply in some parts of Medway (Halling) provided by South East Water. Drivers of increased water demand include an increase in population, a decrease in household occupancy and climate change. The draft Southern Water Resource Management Plan (2024)[138] aims to manage and meet future demand through encouraging water use efficiency, for example by innovative techniques like integration of artificial intelligence for installing water meters and reducing leakage.

15.1.3 Medway could be threatened by the climate change effects that may influence water supply, with increasing potential of water supply droughts. Medway will therefore be under the protection of the Southern Water Drought Plan (2019)[139] that has set out the strategy and activities that Southern Water will implement in managing impacts and mitigating the likelihood of a drought. Furthermore, pollution incidents have been reported, prompting Southern Water to develop a Drainage and Wastewater Management Plan (DWMP)[140] aimed at recommending necessary improvements.

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

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

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

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

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

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

Water quality

15.1.4 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water[141]. Watercourses that pass through Medway include the River Medway and smaller rivers and tributaries.

15.1.5 An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted[142]. However, development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. Each development proposal would need to be evaluated according to land use type, size of development and exact location to determine the potential impacts on water quality.

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

15.1.7 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. The Environment Agency (EA) has produced a document which provides information on how they manage and protect groundwater[143]. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants.

15.1.8 There are three categories of SPZ[144] as follows:

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

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

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

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

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

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

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

Key issues for water include:

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

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

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

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

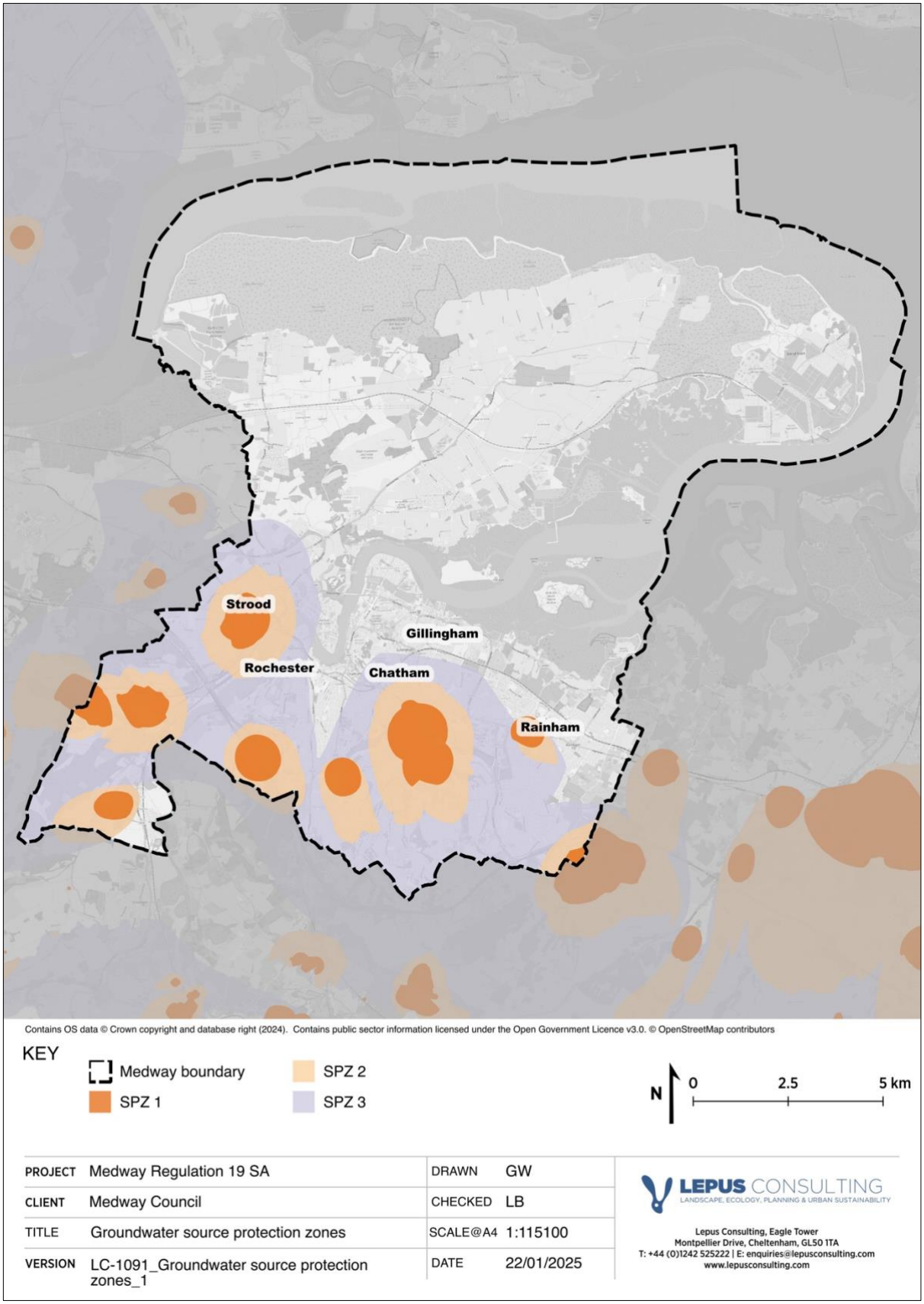


Figure 15.1: *Groundwater source protection zones within Medway*

15.2 Evaluating the effect of the MLP on water

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

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

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

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

Identified effects on water	Mitigating MLP policies	Summary of residual effect
1 **Reduction in water quality** The construction and occupation of new development has potential to increase the risk of contamination of waterways, primarily due to increased runoff, as well as the cumulative effect of sewage discharge outflows during storm conditions. Decreased water quality may compromise ecosystem service functions of the water environment with implications for wellbeing of humans as well as biodiversity. Additionally, 63 allocated sites are located within a groundwater SPZ, where new development is more likely to lead to groundwater contamination.	• Policy **DM1 (Flood and water management)** will ensure that all new development integrates the requirements of the Thames RBMP[145] including to improve water quality. Development within a groundwater SPZ will only be permitted providing it has no impact on the groundwater resource. • Additionally, Policy DM1 and **Policy S5 (Securing strong green and blue infrastructure)** encourage the preparation of Surface Water Drainage Strategies including the implementation of multi-functional SuDs to provide benefits for water quality.	The MLP policies, and consultation with water companies, will be likely to partially mitigate impacts on water quality and ecosystem services. The implementation of SuDS will also help to treat diffuse pollution at the source to avoid adverse impacts on water quality. However, development is also likely to cumulatively increase the risk of raw sewage being disposed of in river channels during storm events, which will require additional monitoring in order to alleviate water quality issues. In line with the precautionary principle, a residual adverse impact on water quality and ecosystem services is identified. **Deterioration in water quality and ecosystem services has the potential to be a long-term but potentially temporary significant adverse effect.**

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

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

16 Cumulative effects assessment

16.1 About this chapter

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

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

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

Table 16.1: *Cumulative effects assessment of the MLP*

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Air • Increased generation of, and exposure to, air pollution	Nationally, measures to improve air quality are in place and continue to be prioritised by the UK government, which includes proposals to ban sales of petrol and diesel cars by 2035. Local, regional and national policy including the Medway Local Transport Plan[146] and the emerging Medway Air Quality Action Plan[147] will complement the MLP policies, seeking to tackle congestion and increase the coverage and connectivity of public transport and active travel networks which will help to reduce reliance on private car use. However, with the growth proposed in the MLP, some of which is within or in proximity to an AQMA, an increase in traffic flows and subsequent reduction of air quality will be expected to have residual adverse effects which cannot solely be fully mitigated through MLP policies. Overall, the MLP will be likely to result in a **long-term but potentially temporary significant cumulative adverse effect** on air quality, which could result in secondary effects such as for the health of residents and biodiversity.	-

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

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

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Biodiversity, flora and fauna • Threats or pressures to European sites • Threats or pressures to nationally designated biodiversity sites • Threats or pressures to locally designated and non-statutory biodiversity sites • Fragmentation of the ecological network	Biodiversity sites designated for their national, international or local biodiversity value will continue to benefit from legislative protection. Trend data for a number of important species of fauna and flora indicate that biodiversity levels are decreasing rather than increasing overall[148]. This is due to a wide range of factors including agriculture and climate change. Impacts from development associated with the local plan may also affect overall levels of biodiversity. The MLP policies aspire to enhance habitat connectivity and strengthen the resilience of ecological and GI networks against current and future pressures. They support the conservation and expansion of GI coverage, along with the creation of new habitats, providing opportunities to improve connections between biodiversity features and support nature recovery. However, **at the time of writing and in the absence of the HRA conclusions, uncertainty remains** with regard to the potential implications of the MLP allocations when considered in combination with growth across the wider Kent region on the European designated estuarine habitats and the species they support. Monitoring and the currency and availability of robust trend data remains vital to the proper planning and management of biodiversity in Medway.	**+/-**
Climatic factors • Risk of fluvial and tidal flooding (present and future) • Surface water flood risk • Reduced viability of flood defences • Increased GHG emissions • Loss of multi-functional GI	The MLP policies set out provisions to reduce GHG emissions (including embodied carbon emissions), seek opportunities for renewable and low carbon technologies, enhance GI and reduce flood risk. However, the development proposed in the MLP is likely to contribute towards a cumulative increase in GHG emissions with increased energy demand associated with this new development as well as transport related emissions, and the production and use of materials during construction. Overall, the MLP could potentially result in a **cumulative adverse effect on climate change** when considered alongside global and national trends of increased frequency and severity of storm events and extreme weather, which may lead to secondary effects such as threats to the health and safety of residents, further declines in the diversity of habitats and wildlife, and water supply across the Plan area. The emerging Future Homes Standard will seek to ensure that new homes are future-proofed with low-carbon heating systems, air-source heat pumps and high levels of energy efficiency. This new standard, coupled with local interventions and consideration of carbon offsetting schemes, has the potential to limit Medway's contributions to the climate crisis in the longer term.	**-**

[148] State of nature report (2023) Available at: https://stateofnature.org.uk [Date accessed: 27/06/25]

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Cultural heritage • Alter the character and/or setting of designated heritage assets • Alteration of Medway's historic character (including Conservation Areas)	Medway supports a range of designated and non-designated heritage features. The MLP policies in combination with adopted SPDs[149][150], legislation and wider heritage schemes such as the HAZ[151] will be expected to help ensure that **adverse impacts on designated heritage assets arising from proposed development are avoided** whilst strong design and management principles will help to conserve their significance and setting. The MLP policies will further encourage the conservation and enhancement of historic features which may lead to **longer term benefits for Medway's historic character** through encouraging heritage-led regeneration and redevelopment of previously developed land, including at Chatham and Gillingham waterfront locations.	+
Human health • Sustainable access to healthcare / leisure facilities • Exposure to air / noise pollution (from AQMAs and main roads) • Limited access / net loss of public greenspace • Limited access to PRoW or cycle network	Most site allocations in the MLP are located in areas with good sustainable access to healthcare facilities and transport options, or areas where improvements to public transport / active travel links and healthcare provisions have been set out. Access to open space and the countryside for recreation is likely to be generally good, accounting for new and expanded facilities. However, the development allocated in the MLP will be expected to put pressure on existing healthcare and open space provision especially when considered in combination with neighbouring authority growth. Although the Infrastructure Delivery Plan (IDP) seeks to ensure adequate delivery of new infrastructure in line with planned growth in Medway, **uncertainty remains in terms of the delivery of new healthcare infrastructure to meet needs sustainably**, given the existing poor GP-to-patient ratio in Medway.	+/-

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

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

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

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Landscape • Threats or pressures to the Kent Downs NL • Alteration of landscape character and sensitive / locally distinctive landscapes • Changes in views experienced by local residents and users of the PRoW network • Increase urban sprawl and coalescence between settlements	The Kent Downs National Landscape will continue to benefit from legislative protection. Various MLP policies promote sensitive and high-quality design that will respect and where possible enhance the local character, and seek to maintain separation between settlements with careful use of GI and green buffers. The MLP seeks to direct development towards previously developed land where possible, although to meet the identified housing requirements, a proportion of growth within the Plan is located on previously undeveloped land including in proximity to the Kent Downs NL (within the Capstone Valley) and on the current sparsely populated Hoo Peninsula. When considered alongside development pressures in neighbouring authorities, including trans-boundary sites with Gravesham and Maidstone boroughs, the MLP is likely to lead to a **long-term and irreversible cumulative adverse effect on landscape character and tranquillity** associated with the incremental loss of undeveloped land and open countryside.	-
Population • Provision of new homes • Provision of employment opportunities • Sustainable access to, and pressure on, local services and facilities	The MLP is likely to have a **positive effect on people and the economy** as a result of the provision of new homes and employment floorspace to meet the diverse range of needs in the Plan area. The MLP also seeks to ensure that housing of a range of types and tenures is available to residents, including affordable housing and housing for people with specific needs. The MLP policies will help to ensure sustainable access to services, supported by local and national policy that promotes the improvement and integration of public transport. The MLP will ensure protection of existing facilities and provision of new facilities to address accessibility gaps. Overall, **no significant impacts are expected in terms of accessibility**.	+
Material assets • Waste generation • Sterilisation of mineral resources	The MLP policies will be expected to ensure that potential impact on safeguarded minerals is avoided or minimised, leading to a positive effect on the conservation of mineral resources. Although the WNA[152] identified sufficient existing consented capacity for recycling, composting and inert waste projected over the Plan period, the construction and occupation of new homes and businesses could cumulatively increase non-inert waste production and potentially impact the capacity of existing waste facilities. When considered alongside growth in neighbouring areas, there is **potential for a cumulative, but potentially temporary, significant adverse effect on the capacity of waste management facilities**.	-

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

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Soil • Loss of soil resources	Nationally, rates of soil erosion are increasing. Soil is a non-renewable resource, which performs several important ecosystem services and supports a diverse range of habitats. Despite seeking to make the best use of available brownfield and previously developed land the proposed allocations in the MLP will cumulatively result in the loss of up to c.1,064ha of previously undeveloped land, of which c.948ha is potential BMV land[153]. Whilst the MLP does seek to increase GI across the Plan area, and make use of BMV land in some locations via community allotments, the loss of permeable soils has potential to increase soil erosion, flood risk and reduce biodiversity. Loss of soil can compromise the ability of the soil biome to effectively provide ecosystem services. Overall, there is potential for a **permanent cumulative adverse effect on ecosystem services**.	--
Water • Reduction in water quality • Increased demand for water and wastewater management	Water abstraction, consumption and treatment in the local area will continue to be managed by the EA and water companies through the RBMP, WRMP and CAMS in line with the Water Framework Directive. The expected increase in population as a result of the development proposed in the MLP will increase pressure on both water supply and wastewater management infrastructure. Whilst it is likely that these measures will mitigate any adverse effects, at the time of writing, no data has been made available to confirm whether WwTW that serve Medway will have capacity for the projected growth, or whether sufficient water resources are available to support water supply for new development. Irrespective of this, when considered in combination with growth in neighbouring authorities, and with climate change leading to increased storm events, there is potential for adverse impacts on downstream water quality as a result of diffuse pollution and increased sewage overflows into waterbodies. **A long-term cumulative effect has been identified in terms of water quality.**	-

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

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

17 Monitoring

17.1 Context

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

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

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

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

17.2 Monitoring proposals

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

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

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

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

18 How the SA has influenced the Plan

18.1 The role of the SA

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

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

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

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

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

18.2 Recommendations

18.2.1 Recommendations made throughout the SA process have been fed back to the Council to assist their decision making as the MLP has been developed. This includes recommendations made in Table 9.1 of the Regulation 18 Interim SA Report[154] which are replicated below in **Table 18.1**. Further recommendations have been made during the preparation of this Regulation 19 SA Report, building on those at the Regulation 18 stage, which are summarised in **Table 18.2**.

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

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

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

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

SA Objective	Recommendations made in the Regulation 18 Interim SA Report	Medway Council response
1: Climate Change Mitigation	• Provide necessary infrastructure to encourage low carbon options and carbon neutral development where possible. • Consider retrofitting buildings to make them more energy efficient. • Different approaches to heat decarbonisation and the removal of gas boilers (as advocated under the Future Homes Standard[155]), should be promoted through the MLP including consideration of district heating network connections and / or heat pumps. Opportunities to promote Passivhaus buildings[156] should be considered. • As part of additional supporting evidence for the MLP, the Council could consider commissioning a climate change study and calculating / reporting on greenhouse gas emissions in greater detail. This could include use of the Greenhouse Gas Accounting Tool[157]. More detailed carbon footprint data for the Plan area would enable the SA process to evaluate changes to carbon emissions as a consequence of the Plan in terms of (a) evolution of the baseline without the plan, and (b) effect on climate change through increased or decreased emissions, with the Plan. • It is recommended that Whole Life-Cycle Carbon (WLC)[158] assessments are carried out to provide more accurate detail on the carbon emissions likely to be generated as a result of development, particularly for strategic development sites. • The recommendations of the RTPI Planning for Climate Change guidance[159] should be considered.	• Policies S1 (planning for climate change) and DM6 (sustainable design and construction) require developments to demonstrate how the climate emergency will be addressed and support whole life low carbon designs. • Policy T41 (heat networks) will ensure that the heat network provision hierarchy is followed.
2: Climate Change Adaptation	• Ensure development proposals explore every opportunity to incorporate GI enhancements, recognising the multi-functional benefits of GI including for wildlife, recreation, flood risk mitigation, urban cooling / shading and carbon storage. The role of GI in relation to flood risk is particularly important in	• Policy S5 (securing strong green and blue infrastructure) sets out the Council's approach to conserving and enhancing Medway's network of green and blue infrastructure, and supports the principles of

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

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

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

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

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

SA Objective	Recommendations made in the Regulation 18 Interim SA Report	Medway Council response
	the Medway area given its coastal location and the prevalence of fluvial and tidal flood risk. • Prioritise the safeguarding of land alongside existing coastal flood defences to ensure the Plan is proactively planning for climate change and likely raising of defences in line with the Thames Estuary 2100 (TE2100) Plan[160]. • Ensure development proposals do not result in the exacerbation of surface water flood risk in surrounding areas. Development proposals should be built in accordance with the recommendations of the latest Surface Water Management Plan[161].	Natural England's GI Framework. • Policy DM1 (flood and water management) makes specific reference to any required flood risk management infrastructure being in accordance with the EA's MEAS and TE2100 programmes. • Policy DM1 additionally requires all development identified as being in a Sensitive Drainage Area to provide a Surface Water Management Strategy and SuDS proforma.
3: Biodiversity and Geodiversity	• Medway Council could consider encouraging a higher BNG target than the statutory minimum of 10% as set out in Policy S2, for example on strategic development sites. Further, the Council could consider implementing an Environmental Net Gain policy which would require developers to deliver a wider range of environmental benefits than BNG alone, such as for air quality and flood risk management[162] [163], which would reflect the aims of the 25-year Environment Plan[164] and the Environmental Improvement Plan[165]. • Local green and blue infrastructure networks should be protected and enhanced, including retrofitting GI within urban areas. It is recommended that the Draft Medway Green and Blue Infrastructure Framework[166], is updated to ensure it reflects the latest national policy and guidance including Natural England's Green Infrastructure Framework[167]. • The findings and recommendations of the emerging Habitats Regulations Assessment (HRA) of the MLP	• Policy S5 (securing strong green and blue infrastructure) seeks to ensure opportunities to retro-fit GI into existing urban areas are maximised. • Recommendations made in the HRA process have been taken into account particularly for Policies S2 and S3 at the Regulation 19 stage. • Various MLP policies make reference to aiding the delivery of the Kent and Medway Local Nature Recovery Strategy. • Policy S2 (conservation and enhancement of the natural environment) has been

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

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

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

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

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

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

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

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

SA Objective	Recommendations made in the Regulation 18 Interim SA Report	Medway Council response
	should be taken into account and incorporated into the policies. • Policies should support development which aims to conserve, and where possible provide, supporting habitat to nearby European sites and SSSIs (particularly the Medway Estuary and Marshes). • There is a need to protect and improve resilience and connectivity of biodiversity sites through landscape-scale management alongside planned growth. The MLP should ensure that measures to help the delivery of the emerging nature recovery network are incorporated into the Local Plan, in accordance with the emerging Kent and Medway Local Nature Recovery Strategy[168]. • The findings and recommendations of the emerging Cumulative Ecological Impact Assessment should be taken into account within the MLP, to ensure that development avoids harm to sensitive biodiversity assets including the Chattenden Woods and Lodge Hill SSSI. • It is recommended that site-specific policies are prepared for preferred development sites with potential to adversely affect a biodiversity asset to provide details on the proposed development and how any biodiversity asset would be retained and/or enhanced. • The MLP should seek to ensure that new development does not worsen, and seeks opportunities to improve, the ecological and chemical status of the River Medway.	updated to make direct reference to Chattenden Woods and Lodge Hill SSSI as part of the proposed strategic environmental programme for designated sites on the Hoo Peninsula.
4: Landscape and Townscape	• The MLP should ensure development proposals are constructed in accordance with appropriate design guides and codes, including the 'Design: process and tools'[169] government guidance. Implementing locally specific guidance is recommended to support local distinctiveness and tailor the approach to reflect local priorities. • Ensure development proposals are in-keeping with the local landscape character and the findings and recommendations of the emerging Landscape Character Assessment (2024), or any subsequent evidence prepared. Linked to this, the Local Plan policies (such as Policy S4 and T1), when finalised, should ensure there is clear cross-referencing to specific evidence documents and policy guidance to provide clarity for developers and encourage higher quality and more sustainable developments. • The MLP policies should encourage active frontages within town centres and high streets. Improvements to GI coverage within urban areas should also be encouraged, such as through seeking opportunities to design GI into frontages or implement public realm landscaping schemes. This would provide opportunities to improve the quality, character, and	• Policy T1 (high quality design and amenity) and other MLP policies refer to the requirements of established and emerging design guidance and codes. • Policy T25 (user hierarchy and street design) promotes active frontages to help create characterful places. • Policy S5 (securing strong green and blue infrastructure) sets out the Council's approach to conserving and enhancing Medway's network of green and blue infrastructure. • MLP policies, including S4 (landscape protection and enhancement) and S6 (Kent Downs National Landscape) recognise the diversity and importance of Medway's landscapes including the

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

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

SA Objective	Recommendations made in the Regulation 18 Interim SA Report	Medway Council response
	appearance of built form, promoting a strong sense of place and encouraging visitors. • Where new development is located within or in proximity to the Kent Downs AONB (National Landscape), it is recommended that a full assessment of the potential impacts to the National Landscape and its setting are considered, in accordance with the NPPF. The Local Plan should aid the delivery of the vision for sustainable development as set out in the Kent Downs AONB Management Plan 2021-2026[170]. • Development proposals should embrace the principles of the 2020 'Building Better, Building Beautiful' report[171], promoting the three pillars advocated in the report: *"ask for beauty, refuse ugliness and promote stewardship".*	Kent Downs National Landscape and its setting.
5: Pollution and Waste	• Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring. • Development proposals should aim to protect areas identified as tranquil. An example method for identifying tranquillity include 'Mapping Tranquility'[172]. • The Council should seek to proactively collaborate with water companies to ensure that future growth in Medway can be accommodated and any potential adverse effects are mitigated in terms of wastewater infrastructure, water resources and water efficiency, in line with the latest Drainage and Wastewater Management Plans (DWMP). This could be brought out more strongly in Policy DM1, setting out measures to ensure the deterioration of water quality is prevented from any possible source with cross-reference to the requirements of the latest DWMP. • The draft Local Plan Vision could be enhanced through incorporating reference to protecting and enhancing water quality to ensure this aspiration is embedded throughout the Plan. • Development proposals should demonstrate measures to minimise waste generation during both construction and occupation. Development proposals should integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting for site end users. • Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with 'Net Zero the UK's contribution to stopping global warming'[173].	• Policy DM15 (monitoring and managing vehicle trip generation) sets targets for lower vehicle trip generation and requires contributions towards the package of transport mitigation and monitoring. • MLP policies including T35 (provision of additional waste management capacity) promote the management of waste at the highest point practical in the waste hierarchy, and Policy DM5 (housing design) requires recycling and refuse storage to be built into the overall design of new development. • Policy DM4 (noise and light pollution) requires development proposals which are noise sensitive to demonstrate adequate mitigation to support a good quality of life and health.

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

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

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

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

SA Objective	Recommendations made in the Regulation 18 Interim SA Report	Medway Council response
	• A Water Cycle Study should be used to provide evidence to inform strategic planning with regard to water resources, to help improve water quality and avoid the generation of pollution to watercourses and/or groundwater, especially given the increased number of houses and contemporary climate change issues. • It is recommended that development proposals include visual and auditory buffers at the edge of the development to help mitigate noise pollution from railway lines and main roads. Additionally, development proposals that could potentially result in an increase in noise disturbance should be adequately mitigated, through efficient layout, design and including noise insulation. • All development proposals should take into consideration recommendations within the relevant Air Quality Action Plan and outputs of the Annual Status Reports. Sites that are located in close proximity to AQMAs should consider measures to ease congestion within the surrounding area to reduce pressure on the AQMA.	
6: Natural Resources	• The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion. • Effective management should be in place to help prevent pollution and unnecessary compaction of soils during construction. Consider the requirement for Construction Environmental Management Plans in Planning Conditions. • Residential uses in town centres such as above retail areas should be promoted where appropriate, to help reduce the quantity of new land required to meet housing demands and make more efficient use of space, protecting greenfield land in the area. • Where impacts on BMV soil resources cannot be avoided, preference should be given to sites with lower ALC grade soils. Where possible, provide GI or open spaces to protect areas of BMV soil within a site boundary and/or encourage use of these areas for community allotments to promote local food production. • The draft Local Plan Vision could be enhanced by setting out a clear preference for brownfield development, seeking to make the best use of available land and redevelop urban centres. • Encourage the reuse of contaminated land for new development, where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use. • Medway is located in an area of serious water stress as identified by the EA[174]. Medway Council should ensure that the findings and recommendations of the water companies' latest Water Resources Management Plans and Drought Plans are taken into	• Policy S15 (town centres strategy) supports residential uses above ground floor along high streets to support urban living and sustainable development. • Policy DM2 (contaminated land) sets out the need to remediate any contaminated land on sites allocated for development. • Policy DM1 (flood and water management) requires developments within a groundwater SPZ to have regard to relevant Water Resources Management Plans. • Policy S1 (planning for climate change) recognises that Medway lies in an area of water stress and requires measures to reduce water consumption.

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

SA Objective	Recommendations made in the Regulation 18 Interim SA Report	Medway Council response
	account to ensure the proposed levels of growth can be accommodated and that water supply and demand can be balanced.	
7: Housing	• The MLP should ensure development proposals provide adequate indoor space in line with, or wherever possible exceeding, the requirements set out in the technical housing standards[175]. Residential development proposals should incorporate functional private or communal open space, including green space. • The MLP policies should ensure proposed sites for Gypsies, Travellers and Travelling Showpeople seek to provide suitable access to local services, healthcare, and schools to facilitate sustainable development and integration with the community. This could include measures such as developing travel plans to improve public transport connections. The layout and design of new sites should be carefully considered with reference to good practice guidance[176].	• Relevant MLP policies, including T1 (high quality design and amenity), set out amenity requirements including space standards to comply with. • Policy T10 (Gypsy, Travellers and Travelling Showpeople) sets out requirements for new and expanded sites including access, design and location.
8: Health and Wellbeing	• Development proposals should take into consideration the findings of the latest Playing Pitch Strategy[177] or other relevant documents within the evidence base to ensure that future demands for recreational facilities can be met. • Seek opportunities to improve or enhance the coverage and connectivity of the PRoW and cycle network across the Plan area, and ensure development proposals do not result in detrimental impacts to the safety of pedestrians and cyclists. • In line with the emerging Green and Blue Infrastructure Framework[178], the Local Plan should ensure that road layouts incorporate urban greening schemes, and provide active travel routes through greenspace to help reduce exposure to air pollution and improve health. • Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres.	• Policy T28 (existing open space, outdoor sports and play spaces) requires consideration of the Council's Open Space Assessment and Playing Pitch Strategy when considering any potential for redevelopment of existing facilities. • Several MLP policies including S5 (securing strong green and blue infrastructure), T1 (high quality design and amenity) and site allocation policies highlight the need to improve pedestrian connectivity. • Various MLP policies seek to promote social cohesion and strong centres, including Policy SA8 (Hoo St Werburgh and Chattenden) that seeks to strengthen centres alongside planned growth in the area.

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

[176] Communities and Local Government (2008) Designing Gypsy and Traveller Sites: Good Practice Guide. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsysites.pdf [Date accessed: 11/06/25]

[177] 4Global (2019) Medway Council Playing Pitch Strategy – Needs Assessment, October 2019. Available at: https://www.medway.gov.uk/downloads/file/4522/medway_council_playing_pitch_strategy_-_needs_assessment [Date accessed: 11/06/25]

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

SA Objective	Recommendations made in the Regulation 18 Interim SA Report	Medway Council response
9: Cultural Heritage	• Where a development proposal could potentially result in substantial harm to the significance of a historic asset, clear justification should be provided, for example public benefits outweighing the harm to the asset. This will be particularly applicable if the Council intend to prepare any site policies to accompany specific allocations at the Regulation 19 stage. • The MLP should promote innovative re-use of existing building stocks, including developments which would improve the energy efficiency of historic buildings and take into account their embodied carbon value when considering their retention and re-use, versus their replacement. Medway Council should refer to Historic England's guidance on keeping historic buildings in good repair[179]. • It is recommended that all development proposals that are likely to impact heritage assets, particularly strategic sites, should be accompanied by a Heritage Impact Assessment[180]. • Furthermore, it is recommended where a development proposal could potentially coincide with an archaeological feature, the site should be subject to an appropriate archaeological desk-based assessment. • The proposed historic environment policies such as Policies DM9 and DM10 could be strengthened by ensuring that development will "*conserve and enhance*" rather than "*conserve or enhance*" the significance of heritage assets and conservation areas, ensuring that development conserves and seeks opportunities to enhance heritage assets and their settings. • Draft Local Plan policies relating to town centres and the built environment (such as Policies S15, S17 and DM14) could be strengthened through referencing the conservation and enhancement of cultural heritage features alongside the proposed enhancements to town centres, or cross referencing to historic environment policies.	• Policy DM9 (heritage assets) highlights the exceptional circumstances in which demolition or loss of a heritage asset will be permitted. • Policy DM9 further encourages vacant or 'at risk' heritage assets to be brought back into use and requires adherence to good practice guidance including Historic England's advice notes. • Various site allocation policies set out the requirement for a Heritage Impact Assessment to be prepared to inform the proposed development.
10: Transport and Accessibility	• Ensure all development proposals and travel plans aim to reduce the reliance on private car use wherever possible and applicable, and aim to promote access to local facilities and services in a manner which minimises emissions and promotes active travel. • Improving connectivity of active travel routes should be a priority, owing to the severance of many routes due to the landscape / townscape being dominated by the highway networks discouraging use. • Electric vehicle charging networks should be supported including improved distribution and quantity of charging points and public transport options across the Plan area, in particular the rural	• Policy DM20 has been updated to include reference to 'Building for a Healthy Life' guidance. • Policy DM19 (vehicle parking) sets out the requirement to provide EV charging points, and Policy T26 (accessibility standards) encourages improved access to shared mobility including EV car clubs.

[179] Historic England (2023) Stopping the Rot: A guide to enforcement action to save historic buildings. Available at: https://historicengland.org.uk/images-books/publications/stoppingtherot/ [Date accessed: 11/06/25]

[180] DLUHC (2014). Historic environment. Advises on enhancing and conserving the historic environment. Available at: https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Regulation 18 Interim SA Report	Medway Council response
	areas, recognising the crucial role that local authorities play in enabling the transition to electric vehicles[181]. • It is recommended that development proposals consider the recommendations of the National Cycling Strategy[182] and the National Design Guide[183] to create accessible spaces and promote active travel. Draft Policy DM20 relating to cycle parking and storage could be enhanced by cross referencing to the 'Building for a Healthy Life' guidance which sets out design recommendations in relation to the location and design of cycle parking in residential and non-residential developments to encourage greater use of cycling or scooters as a travel option. • Draft Policy T25 'user hierarchy and street design' only applies to those developments requiring a Design and Access Statement, often major development. The sustainability performance of the policy could be enhanced by stating how the policy can be applied to smaller developments that do not require a Design and Access Statement, where feasible. • The draft Local Plan policies relating to transport and accessibility, such as Policy T26, could be enhanced through including reference to public transport links to train stations for onward travel.	
11: Education	• Seek to increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need. • Ensure that wherever possible, walkable neighbourhoods and safe routes are created, especially to primary schools. • In Medway's more rural areas, where it is less likely that walking to school is a viable option, travel plans or other transport assessments should be prepared to demonstrate how consideration has been given to prioritising sustainable travel options to schools over the use of private cars.	• Information on school capacity across Medway has been used by the Council to determine the need for expanded and new schools in specific locations to mitigate needs arising from planned development. See the Infrastructure Delivery Plan.
12: Economy and Employment	• Ensure employment-led proposals are located in close proximity to high-frequency bus stops or other sustainable transport options for employees to reach employment opportunities, informed by the latest available accessibility information. • Improve access to employment opportunities, through provision of bus stops or increased frequency of bus services, and/or improvements to the local pedestrian and cycle networks.	• Policy DM20 (cycle parking and storage) sets out standards applying to non-residential as well as residential developments with regard to cycle infrastructure and accessibility.

[181] Office for Zero Emission Vehicles (2025) On-Street Residential Chargepoint Scheme. Available at: https://www.gov.uk/government/publications/grants-for-local-authorities-to-provide-residential-on-street-chargepoints/grants-to-provide-residential-on-street-chargepoints-for-plug-in-electric-vehicles-guidance-for-local-authorities [Date accessed: 11/06/25]

[182] Highways England (2016). Cycling Strategy. Available at: https://assets.publishing.service.gov.uk/media/5a81965fed915d74e33ff04f/S150572_Cycling_Strategy.pdf [Date accessed: 11/06/25]

[183] MHCLG & DLUHC (2021). National design guide. Available at: www.gov.uk/government/publications/national-design-guide [Date accessed: 11/06/25]

SA Objective	Recommendations made in the Regulation 18 Interim SA Report	Medway Council response
	• Infrastructure policies should be strongly worded to ensure potential for adverse effects on landscape, biodiversity and heritage assets associated with new employment-led development are considered and avoided/mitigated accordingly.	

Table 18.2: *Recommendations made in the Regulation 19 SA and actions taken by Medway Council*

SA Objective	Recommendations made during preparation of the R19 SA Report	Medway Council response
MLP policies (see **Appendix H**)	• Policy S22 could be strengthened through including more specific reference to measures needed to achieve place making ambitions and set out how the new centre will benefit the local landscape.	• Policy S22 notes the need for a main centre in an "*attractive location … to ensure place making ambitions are achieved*." • The subsequent design criteria in Policy SA8 was strengthened to require "*a Hoo Planning Framework, including a masterplan, to guide planning applications and further approval of details*."
Site allocation policies (see **Appendix K**)	• Policies allocating brownfield sites / supporting regeneration (e.g. SA1 – Chatham, SA4 – Gillingham) could usefully include consideration of identifying any potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, in order to minimise embodied carbon emissions. Cross-reference to relevant provisions of other MLP policies such as Policy S1 may strengthen the site policies in this regard. • Several of the policies (particularly in urban area) could go further in supporting low-car or car-free development, and requiring incorporation of low-carbon or renewable technologies and sustainable design principles (or via cross-referencing to other MLP policies where relevant). • It is recommended that site policies are consistent in the level of detail and site specific requirements, with reference to the latest outputs of the evidence base. For example, Policy SA2 should include details regarding how flood risk on site (identified in the SFRA as "extreme" hazard) should be addressed and mitigated. All policies should encourage GI integration and provision of open space, that can deliver multi-functional benefits. • Where it is listed in policy text that further evidence is required (e.g. "transport study", "green infrastructure strategy" or "HIA"), it may be helpful if the policy could briefly highlight what the envisaged output of these studies will be / how the development should use this information. • Given the location of sites allocated under Policy SA7 – Capstone Valley with respect to the Kent Downs National Landscape it is recommended that further site-specific landscape evaluations (e.g., a LVIA) are undertaken to understand the extent to which development can be accommodated without harm to the setting of the National Landscape.	• Several site allocation policies require a masterplan at a subsequent planning stage. The Council will lean on the SA recommendations to define planning principles. • The criteria in several site allocation policies were strengthened to require GI strategies to inform masterplans. • Several site allocation policies were amended to incorporate wording regarding minimising embodied emissions. • Policy DM23 requires development proposals to facilitate re-use existing structures as far as possible. • Policy DM19 refers to the current Parking Standard, which allows for a reduction in the car parking provision, particularly in town centre locations. • Local policy requirements above building standards would very likely be an issue for development viability, given the findings of the Viability Assessment. • The site allocations avoid repetition or duplication of strategic, thematic or

SA Objective	Recommendations made during preparation of the R19 SA Report	Medway Council response
	• It is recommended that further details are incorporated into Policy SA13 to provide clarity on the purpose and content of the proposed Frindsbury Peninsula Planning Framework and how it will address the on-site challenges and opportunities. • Additional wording could be incorporated into Policy SA14 – Employment, or via cross-reference to other MLP policies such as Policy T12: Learning and Skills Development, to ensure opportunities are sought for research, apprenticeships and development of skills where practicable.	development management policies.

19 Conclusions

19.1 Residual effects following mitigation

19.1.1 The SA has assessed the site allocations and policies proposed in the MLP using the methodology in **Chapter 4** and assumptions as set out in **Appendix E**. A range of sustainability effects have been identified, which are highlighted throughout the policy and site assessments in **Appendices F, G, H** and **K** with residual positive, negligible and negative effects summarised and discussed in **Chapters 7** to **15**.

19.1.2 Proposals in the MLP vary in terms of their sustainability performance with likely positive effects expected on some SA Objectives and adverse effects on others. The SA has identified likely sustainability effects of MLP proposals alone and in-combination.

19.1.3 The MLP is anticipated to result in a range of positive effects on sustainability, which are summarised in **Table 19.1**.

19.1.4 The mitigation proposals presented in the MLP provide positive planning mechanisms for delivering sustainable development where the Plan is able to reasonably address the issue. It is recognised that the Plan cannot fully address the sustainability effects of national and international trends, such as increased frequency of storm events associated with climate change.

19.1.5 As outlined in **Table 19.2**, there are a range of residual adverse effects that are identified as a result of the MLP.

Table 19.1: *Likely residual positive sustainability effects of the MLP*

	Summary of residual positive effects
1	**Protection and enhancement of the ecological network** Overall, the MLP policies are likely to enhance habitat connectivity and strengthen the resilience of ecological and GI networks against current and future pressures. They support the conservation and expansion of GI coverage, along with the creation of new habitats, providing opportunities to improve connections between biodiversity features. Additionally, the policies promote the principles of the emerging Kent and Medway Local Nature Recovery Strategy. Overall, a long-term positive impact on GI opportunities is anticipated.
2	**Addressing flood risk** Allocated sites have undergone evaluation via the Sequential Test and Exception Test as part of the SFRA process. The Level 2 SFRA[184] includes a summary of required actions to ensure that development will be safe and consistent with national policy. There are anticipated to be no significant adverse effects associated with fluvial/tidal flooding or SWFR, subject to achieving the recommendations set out in the SFRA including completion of further site-specific flood risk assessments. The MLP policies will be expected to protect future and existing flood defences from development and ensure delivery of new defences where required as part of the MEAS strategy[185].

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

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

	Summary of residual positive effects
3	**Protection and enhancement of multi-functional green infrastructure** Although there may be some loss of previously undeveloped land associated with development sites that comprise or contain greenfield land, various MLP policies seek to conserve and enhance multi-functional green and blue infrastructure across the Plan area as a whole. Supporting the delivery of GI throughout the Plan area, a positive effect is expected with regard to Medway's ability to adapt to climate change.
4	**Conservation and enhancement of historic character** The MLP will be expected to help avoid or mitigate the potential for significant impacts on designated heritage assets and their settings, including Conservation Areas, arising from proposed development. Effective design policies set out in the MLP are likely to deliver longer-term positive effects for the urban realm and wider historic character.
5	**Provision of public greenspace and active travel opportunities** The MLP policies will be expected to ensure that development proposals do not result in a loss of public greenspace across Medway. Further positive impacts on access to greenspace could be achieved in the longer term, through the provision of on-site or off-site GI and recreational resources. Various MLP policies seek to create permeable neighbourhoods and promote cycling and walking which would be likely to improve the coverage of, and accessibility to, the pedestrian and cycle networks across Medway. An overall positive effect would be likely with regard to pedestrian and cycle access.
6	**Provision of new homes** The MLP proposes the development of 21,194 new homes, which in combination with consented sites and windfall sites, will meet the locally identified housing need of 24,540 homes according to the latest Standard Method calculation. Policies in the Plan set out the requirements to provide an appropriate mix of housing types and tenures, seeking to meet the needs of different groups, including older people. A long-term positive effect on housing provision is anticipated.
7	**Provision of employment opportunities** The MLP proposes the development of sufficient employment land to meet the locally identified need of 204,000m^2 industrial floorspace and 36,500m^2 office floorspace according to the ELNA. The Plan provides land for a portfolio of employment sites that meet the needs of different types of businesses, recognising the potential to realise the strategic economic role of sites such as Grain and Kingsnorth in growing sectors. A long-term positive effect on employment provision is anticipated.
8	**Promoting sustainable access to local services** The MLP policies are expected to improve access to local services and facilities for the majority of sites through providing improved transport networks, developer contributions to services and new service provision. Although access could remain limited within a number of rurally located sites, the implementation of Travel Plans is anticipated to help address this to some extent. On balance, a negligible effect is identified for access to local services, provided that effective Travel Plans and monitoring of their effectiveness is in place.
9	**Preservation of mineral resources** The MLP policies will be expected to ensure that potential impact on safeguarded minerals is avoided or minimised, with development in an MSA only permitted where it would not intervene with the current or potential extraction of valuable mineral resources. A minor positive effect on the conservation of mineral resources is likely.

Table 19.2: *Likely residual adverse sustainability effects of the MLP*

	Summary of residual adverse effects
1	**Increased generation of, and exposure to, air pollution** Despite technological and infrastructure advancements, the proposed development of new homes and employment sites within the Plan area will be expected to cumulatively increase the volume of traffic and a result in a greater demand for energy. As such, increased pollutant emissions, particularly NO_2 and PM_{10}, will be likely that cannot be fully mitigated by MLP policies alone. The transition to clean technologies will continue to take place over the coming years, with a short-term adverse effect identified.
2	**Threats or pressures to biodiversity designations** The MLP policies set out a protective framework that will be expected to identify, avoid and mitigate adverse effects on most biodiversity designations. However, the potential for long-term adverse effects is not anticipated to be fully mitigated where proposed sites coincide with, or are located directly adjacent to, SSSIs (specific consultation with Natural England will be needed, some of which are likely to be addressed as the Hoo Peninsula Strategic Environmental Programme develops), or where sites coincide with or are adjacent to an LNR or LWS, where there is potential for direct habitat loss or degradation. Specific attention is drawn to Chattenden Woods and Lodge Hill SSSI which is home to a nationally important population of Nightingales. At the time of writing, in the absence of the final HRA conclusions regarding air quality and recreational impacts, the effect of the MLP on European sites is uncertain.
3	**Increased GHG emissions** Although the relevant MLP policies will be expected to have a positive impact in helping to reduce GHG emissions, particularly in regard to energy efficient design and low carbon sources, these measures are not expected to fully mitigate the impacts associated with the large quantum of growth expected from the Plan. An increase in GHG emissions as a consequence of the proposed development is expected to be a medium-term significant adverse effect, pending effective implementation of net-zero commitments.
4	**Sustainable access to healthcare and leisure facilities** MLP policies will help to prevent the loss of existing healthcare facilities and improve sustainable access to facilities for some residents; however, the policies will not be expected to fully mitigate the restricted access to healthcare services for sites in more isolated settlements. Limited sustainable access to healthcare facilities is expected to be a medium-term and temporary significant adverse effect.
5	**Alteration of landscape character and sensitive / locally distinctive landscapes** Due to the scale of development proposed, with a large proportion in previously undeveloped locations, these policies are not expected to fully mitigate the potential impacts on landscape character and a residual adverse effect is anticipated. Alteration of the landscape character is a long-term and permanent significant effect. There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan. Additionally, some uncertainty remains in regard to the impact of allocations in the Capstone Valley on the setting of the Kent Downs NL. In the absence of a landscape sensitivity or capacity assessment, it is necessary to adopt a precautionary approach and consider the potential for adverse impacts on the National Landscape.
6	**Increase urban sprawl and coalescence between settlements** Various MLP seek to minimise impacts on the countryside and maintain separation between settlements. However, due to the rural context within which some of the new development is situated, the MLP policies will not be expected to fully mitigate these impacts, and a residual adverse effect is anticipated. An increased risk of urbanisation of the countryside and coalescence is a long-term and permanent significant adverse effect.

	Summary of residual adverse effects
7	**Waste generation** The WNA[186] found sufficient existing consented capacity to meet requirements for recycling, composting and inert waste over the Plan period, but a shortfall in non-inert waste to landfill. The construction and occupation of new homes and businesses could cumulatively increase non-inert waste production and potentially impact the capacity of existing waste facilities. The cumulative impact of increased waste generation on the capacity of waste management facilities could potentially be a medium-term, but potentially temporary, significant adverse effect.
8	**Loss of soil resources** The proposed allocations would cumulatively result in the loss of a significant amount of previously undeveloped land. The loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across Medway. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality and agricultural yield. The loss of previously undeveloped land, a large proportion of which could include BMV land, is expected to be a long-term and permanent significant adverse effect.
9	**Reduction in water quality** It is likely that provisions set out in the MLP policies, and consultation with water companies, will partially mitigate impacts on water quality and ecosystem services. The implementation of SuDS will also help to treat diffuse pollution at the source to avoid adverse impacts on water quality. However, development is also likely to increase the quantity of raw sewage being disposed of in river channels, which will require additional monitoring in order to alleviate water quality issues. A residual adverse impact on water quality and ecosystem services is therefore identified, in line with the precautionary principle. Deterioration in water quality and ecosystem services has the potential to be a long-term but potentially temporary significant adverse effect.

19.2 Consultation and next steps

19.2.1 This report represents the latest stage of the SA process. As per Regulation 13 of 'The Environmental Assessment of Plans and Programmes Regulations 2004'[187], this Regulation 19 SA Report will be published alongside the Publication Version of the Plan. Consultation findings will be used to inform subsequent stages of the SA process.

19.2.2 A six-week period of consultation under the Town and Country Planning Act will be undertaken by Medway Council to offer individuals, businesses and other organisations an opportunity to submit representations regarding the MLP.

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

[186] 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]

[187] The Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 13: Consultation procedures. Available at: https://www.legislation.gov.uk/uksi/2004/1633/regulation/13/made [Date accessed: 29/04/25]

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Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

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