

# Technical Note

## Medway Local Plan Examination Review of updated SFRA data and implications for the Regulation 19 Sustainability Appraisal

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### Purpose of this technical note

1. This Technical Note has been prepared to support the Medway Local Plan (MLP) examination and should be read alongside the Regulation 19 Sustainability Appraisal (SA) Report (June 2025; Core Submission Documents A3.1, A3.2 and A3.3). It provides a review of updated flood risk data prepared as part of the Level 2 Strategic Flood Risk Assessment (SFRA) (November 2025; Evidence Base Documents B6.3, B6.4 and B6.5) and considers whether this updated evidence results in any changes to the findings of the SA.

### Background

2. The Regulation 19 SA Report presents an assessment of the likely significant effects of the MLP, including the appraisal of reasonable alternative sites. As part of this process, sites were assessed against SA Objective 2: Climate Change Adaptation, which includes consideration of flood risk.
3. The assessment was informed by the most up-to-date flood risk data available at the time of preparing the SA (Environment Agency national flood map for planning, March 2025), including datasets relating to fluvial flood risk (Flood Zones 2 and 3) and surface water flood risk.

4. Since the publication of the Regulation 19 SA, updated modelling has been prepared and published through the Level 2 SFRA, providing an updated understanding of flood risk across the Plan area.
5. This note provides a proportionate review of the implications of this updated evidence on the SA.
6. The purpose of this review is not to re-run the SA, but to determine whether updated flood risk evidence materially changes the comparative assessment of reasonable alternatives or the conclusions of the Regulation 19 SA.
7. **Figures 1 and 2** illustrate the updated Flood Zones and Surface Water Flood Risk within the Plan area.

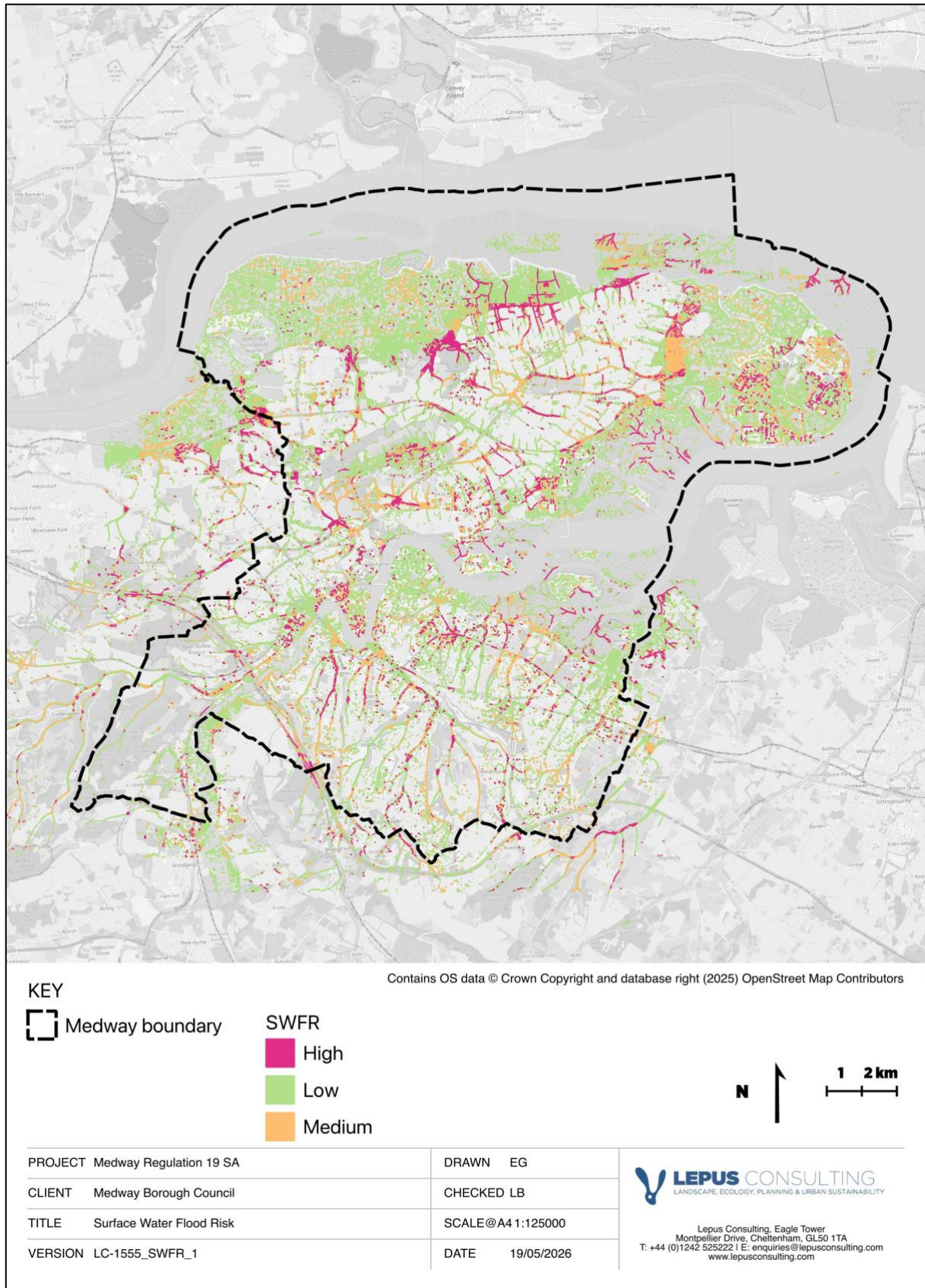


Figure 1: Surface water flood risk in Medway

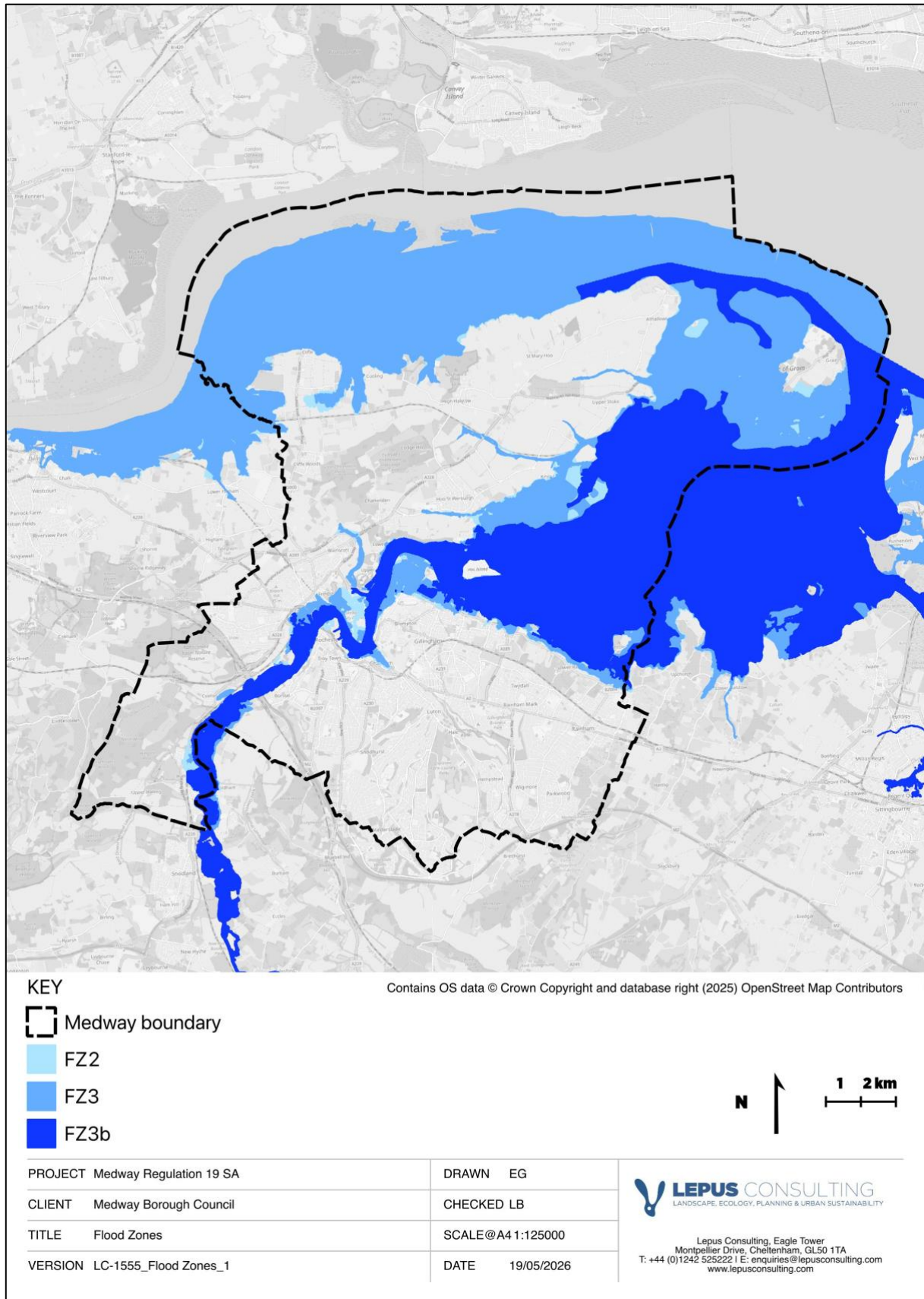


Figure 2: Flood Zones in Medway

## Methodology

8. A proportionate review of the updated flood risk data has been undertaken. This has focused on all reasonable alternative sites assessed within the Regulation 19 SA, including the 27 strategic sites presented in Appendix F and the 335 non-strategic sites presented in Appendix G (see Volume 3 of the Regulation 19 SA; A3.3).
9. The review has comprised:
  - Examination of updated SFRA datasets for fluvial and surface water flood risk;
  - Spatial analysis of site boundaries against the updated datasets using GIS;
  - Identification of any changes in the extent or distribution of flood risk within sites; and
  - Review of SA scoring to determine whether any updates are required.
10. In line with the methodology set out in Appendix E of the Regulation 19 SA, the assessment of reasonable alternative sites against SA Objective 2: Climate Change Adaptation considered three receptors: fluvial flood risk, surface water flood risk, and flood defences.
11. Each reasonable alternative site was appraised against these receptors using the high-level scoring system set out in **Table 1**, replicated from the Regulation 19 SA.
12. All reasonable alternative sites were assessed both pre-mitigation and post-mitigation to ensure transparency in identifying the extent of effects prior to the application of mitigation measures.

**Table 1: SA Objective 2: Climate Change Adaptation receptor methodology**

Score	Likely Impact – Fluvial flooding
--	Development proposals which coincide with Flood Zone 3 (greater or equal to 1% chance of river flooding or 0.5% chance of sea flooding in any given year)
-	Development proposals which coincide with Flood Zone 2 (between 1% and 0.1% chance for river flooding or between 0.5% and 0.1% chance of sea flooding in any given year)
+	Development proposals which are located wholly within Flood Zone 1 (less than 0.1% chance of river and sea flooding in any given year)
Score	Likely Impact – Surface water flooding
--	Development proposals which coincide with areas at high risk of surface water flooding (more than 3.3% chance of flooding each year)
-	Development proposals which coincide with areas at low and/or medium risk of surface water flooding (medium risk between 1% and 3.3% chance of flooding each year; low risk between 0.1% and 1% chance of flooding each year)
0	Development proposals which are not located in areas determined to be at risk of surface water flooding, or are in areas at very low risk (less than 0.1% chance) of surface water flooding
Score	Likely Impact – Flood defences
--	Development proposals which are within 20m of toe of an embankment (includes defences maintained, defences raised, set back embankment).
0	Development proposals which are located beyond 20m of toe of an embankment (includes defences maintained, defences raised, set back embankment).

## Review of updated flood risk evidence: pre-mitigation assessment

### Fluvial flood risk and flood defences

13. The updated SFRA modelling indicates that the extent of fluvial flood risk, as defined by Flood Zones 2 and 3, remains consistent with that used in the Regulation 19 SA.
14. GIS interrogation confirmed that no site crossed a flood zone threshold sufficient to alter the SA scoring, for either strategic or non-strategic sites, pre- or post-mitigation.
15. Lepus has not been made aware of any updated evidence with regard to existing flood defences.
16. The findings of the Regulation 19 SA in respect of fluvial flood risk therefore remain valid.

### Surface water flood risk

17. The updated surface water flood risk data indicates that there are some changes to the spatial extent of areas at risk across the Plan area.
18. A review of all reasonable alternative site assessments confirms that:
  - Surface water flood risk scores for all 27 strategic sites remain unchanged; and
  - Surface water flood risk scores for 46 of the 335 non-strategic sites have changed as a result of updated modelling.
19. The changes identified for the non-strategic sites reflect minor refinements to the spatial extent and distribution of areas of high, medium and low surface water flood risk within site boundaries. The resulting changes to site-level scores for the 46 non-strategic sites are set out in **Table 2**.
20. Of the 46 non-strategic sites reviewed, 27 record a more adverse effect, whilst 19 record a less adverse effect, than that reported in the Regulation 19 SA pre-mitigation assessment. These changes are generally localised and do not represent a substantial alteration to the overall flood risk profile of the sites.

**Table 2: Non-strategic sites with changes to pre-mitigation SWFR receptor assessment**

Site reference	R19 SA (pre-mitigation) SWFR score	Updated SA (pre-mitigation) score
AS1	-	--
AS18	-	--
AS25	0	--
AS29	-	0
AS3	-	--
CCB11	0	-
CCB15	0	-
CCB16	0	-
CCB19	0	-
CCB21	0	-
CCB41	-	0
CHR1	0	-
CHR6	--	-
CHR8	-	0
FP17	0	-
FP2	--	-
FP6	-	--
GN11	-	0
GN5	-	0
GS1	-	--
GS10	0	-
GS13	0	-
GS24	-	0
GS5	0	-
GS6	0	-
HHH21	0	-
L11	-	0
RN12	-	0
RSE1	0	-
RWB10	-	--
RWB3	-	0
RWB6	-	0
SMI2	0	-
SNF12	--	-
SNF17	-	--
SNF20	-	0
SNF26	0	-
SNF27	0	-
SNF36	--	-
SNF8	-	0
SNF9	-	0
SR29	0	-
SR32	0	-
SR35	-	--
SR48	0	-
W1	-	0

## Implications for the Sustainability Appraisal

### Reasonable alternative site assessments

21. The review of updated SFRA data confirms that there are no changes to fluvial flood risk for either strategic or non-strategic sites. The fluvial flood risk and flood defences receptors of SA Objective 2 (Climate Change Adaptation) therefore remain unchanged from those presented in the Regulation 19 SA.
22. Whilst minor changes have been identified in relation to surface water flood risk, these are limited to non-strategic sites and reflect localised variations in the extent and distribution of areas of high, medium and low risk within site boundaries. Strategic site scores remain unchanged.
23. The overall performance of strategic and non-strategic sites against SA Objective 2: Climate Change Adaptation pre-mitigation is shown in **Tables 3** and **4**.
24. The post-mitigation assessment presented in Appendix I of the Regulation 19 SA concluded that the implementation of MLP policies would be expected to mitigate potential adverse effects associated with development in areas at risk of surface water flooding, including through requirements to replicate greenfield runoff rates. The post-mitigation impact matrices are shown in **Tables 5** and **6**, and remain unchanged from those presented in the Regulation 19 SA (Appendix I, Tables I.3.3 and I.3.4).
25. Taking account of both the updated pre-mitigation assessment findings and the post-mitigation assessment conclusions, the updated evidence does not alter the conclusions of the SA in respect of surface water flood risk.
26. Overall, the changes identified do not result in any material change to the assessment of sites against SA Objective 2. Sites continue to perform in a broadly consistent manner to that reported in the Regulation 19 SA, with any differences limited to minor changes arising from updated data.

**Table 3: Reasonable alternative non-strategic sites impact matrix for SA Objective 2 – Climate change adaptation (pre-mitigation)**

Site ref.	Site use	Flood Zones	SWFR	Flood defences
AS1	Residential led	+	--	0
AS10	Residential led	+	0	0
AS11	Residential led (Mixed-use)	+	0	0
AS14	Residential led	+	-	0
AS15	Residential led	--	--	0
AS16	Residential led (Mixed-use)	+	--	0
AS17	Residential led	--	-	0
AS18	Residential led	+	--	0
AS2	Residential led	+	--	0
AS20	Residential led (Mixed-use)	+	--	0
AS23	Residential led	+	-	0
AS25	Residential led	+	--	0
AS28	Residential led	--	-	0
AS29	Residential led	+	0	0
AS3	Residential led	+	--	0
AS5	Residential led (Mixed-use)	+	-	0
AS6	Residential led (Mixed-use)	+	--	0
AS7	Non-residential	+	0	0
AS8	Non-residential	+	-	0
AS9	Non-residential	--	--	0
CCB1	Residential led	+	--	0
CCB10	Residential led (Mixed-use)	+	--	0
CCB11	Residential led	+	-	0
CCB12	Residential led (Mixed-use)	+	0	0
CCB13	Residential led (Mixed-use)	--	--	0
CCB15	Residential led (Mixed-use)	+	-	0
CCB16	Residential led	-	-	0
CCB17	Residential led (Mixed-use)	--	--	0
CCB18	Residential led	+	0	0
CCB19	Residential led (Mixed-use)	+	-	0
CCB2	Residential led (Mixed-use)	+	--	0
CCB20	Residential led (Mixed-use)	-	0	0
CCB21	Residential led (Mixed-use)	-	-	0
CCB22	Residential led	-	-	0
CCB23	Residential led (Mixed-use)	--	-	0
CCB24	Residential led (Mixed-use)	--	--	0
CCB25	Residential led	--	-	--
CCB26	Residential led (Mixed-use)	--	--	0
CCB27	Residential led (Mixed-use)	--	--	0
CCB28	Residential led	+	0	0
CCB29	Residential led	+	0	0
CCB3	Residential led (Mixed-use)	+	0	0
CCB30	Residential led (Mixed-use)	+	0	0
CCB31	Residential led	-	-	0
CCB33	Residential led	+	0	0
CCB34	Residential led (Mixed-use)	+	--	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
CCB35	Non-residential	--	-	0
CCB36	Residential led (Mixed-use)	+	-	0
CCB37	Residential led (Mixed-use)	+	-	0
CCB38	Residential led	+	--	0
CCB39	Residential led	+	-	0
CCB4	Residential led	+	0	0
CCB40	Residential led	+	0	0
CCB41	Residential led	+	0	0
CCB43	Residential led	--	--	0
CCB44	Residential led	+	0	0
CCB46	Residential led	+	0	0
CCB48	Residential led	+	0	0
CCB49	Residential led	+	-	0
CCB5	Non-residential	--	-	--
CCB6	Residential led (Mixed-use)	+	--	0
CCB7	Residential led (Mixed-use)	--	--	0
CCB8	Residential led	--	-	0
CCB9	Residential led	+	0	0
CHR1	Residential led	+	-	0
CHR10	Residential led	+	0	0
CHR11	Residential led	+	0	0
CHR13	Residential led (Gypsy and Traveller)	+	--	0
CHR14	Residential led (Mixed-use)	--	-	--
CHR15	Non-residential	+	--	0
CHR16	Non-residential	+	-	0
CHR17	Non-residential	+	0	0
CHR18	Non-residential	+	0	0
CHR19	Non-residential	+	--	0
CHR2	Non-residential	+	0	0
CHR20	Residential led	--	-	--
CHR21	Non-residential	--	--	0
CHR3	Non-residential	+	--	0
CHR5	Non-residential	+	0	0
CHR6	Residential led	+	-	0
CHR7	Residential led	+	0	0
CHR8	Non-residential	-	-	0
FH1	Non-residential	+	0	0
FP1	Residential led	+	-	0
FP10	Residential led	+	--	0
FP11	Residential led (Mixed-use)	--	--	--
FP12	Residential led	+	0	0
FP14	Residential led	+	0	0
FP16	Residential led (Mixed-use)	+	0	0
FP17	Residential led	+	-	0
FP18	Residential led	--	-	--
FP19	Residential led	+	--	0
FP2	Residential led	--	-	0
FP22	Residential led	+	0	0
FP23	Residential led	--	--	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
FP25	Residential led (Mixed-use)	+	--	0
FP4	Residential led	--	-	0
FP5	Residential led	--	0	--
FP6	Residential led	+	--	0
FP7	Residential led	--	-	--
FP8	Residential led	+	-	0
FP9	Residential led	--	-	--
GN10	Residential led	+	0	0
GN11	Residential led	+	0	0
GN13	Residential led	--	0	--
GN14	Residential led	--	--	0
GN15	Residential led (Mixed-use)	--	--	--
GN3	Residential led	--	--	0
GN4	Residential led	--	--	0
GN5	Residential led	+	0	0
GN6	Residential led (Mixed-use)	--	--	--
GN8	Residential led	+	0	0
GS1	Residential led	+	--	0
GS10	Residential led (Mixed-use)	+	-	0
GS11	Residential led	+	-	0
GS12	Residential led (Mixed-use)	+	0	0
GS13	Residential led	+	-	0
GS14	Residential led (Mixed-use)	+	0	0
GS18	Residential led (Mixed-use)	+	-	0
GS19	Residential led	+	0	0
GS2	Residential led	+	0	0
GS20	Residential led	+	0	0
GS23	Residential led	+	0	0
GS24	Residential led	+	0	0
GS26	Residential led	+	0	0
GS27	Residential led (Mixed-use)	+	0	0
GS29	Residential led	+	-	0
GS30	Residential led	+	0	0
GS32	Residential led	+	0	0
GS33	Residential led	+	--	0
GS34	Residential led	+	0	0
GS35	Residential led	+	0	0
GS37	Residential led (Mixed-use)	+	--	0
GS4	Residential led	+	0	0
GS5	Residential led	+	-	0
GS6	Residential led	+	-	0
GS7	Residential led (Mixed-use)	+	0	0
GS8	Residential led (Mixed-use)	+	0	0
HHH1	Non-residential	+	--	0
HHH11	Residential led	+	-	0
HHH14	Residential led	+	-	0
HHH15	Residential led	+	0	0
HHH16	Non-residential	+	-	0
HHH17	Residential led	+	-	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
HHH18	Residential led (Mixed-use)	+	---	0
HHH19	Non-residential	+	-	0
HHH21	Non-residential	---	-	0
HHH23	Residential led (Mixed-use)	+	-	0
HHH24	Residential led	+	-	0
HHH25	Residential led	+	-	0
HHH28	Residential led (Mixed-use)	+	---	0
HHH29	Residential led (Mixed-use)	+	-	0
HHH30	Residential led (Mixed-use)	---	---	0
HHH32	Residential led	---	0	0
HHH33	Residential led	+	0	0
HHH37	Non-residential	---	-	0
HHH38	Non-residential	---	-	0
HHH39	Non-residential	+	-	0
HHH4	Residential led	+	0	0
HHH40	Residential led	+	0	0
HHH41	Residential led	+	---	0
HHH5	Residential led	+	0	0
HHH7	Residential led	+	-	0
HHH8	Residential led (Mixed-use)	+	---	0
HHH9	Residential led	+	---	0
HW11	Residential led	+	-	0
HW3	Residential and secondary school	+	-	0
HW5	Non-residential	+	---	0
HW6	Residential led	+	-	0
HW7	Residential or non-residential	+	-	0
HW8	Residential led	+	0	0
L11	Residential led	+	0	0
L12	Residential led	+	0	0
L2	Residential led	+	0	0
L3	Residential led	+	---	0
L7	Residential led	+	-	0
L9	Residential led	+	-	0
LW10	Residential led	+	---	0
LW2	Residential led	+	0	0
LW3	Residential led	+	0	0
LW4	Residential led	+	---	0
LW5	Residential led	+	0	0
LW7	Residential led	+	-	0
PP1	Residential led	+	-	0
REWW3	Residential led	+	---	0
RN1	Residential led	---	---	0
RN10	Residential led	+	-	0
RN11	Residential led	+	---	0
RN12	Non-residential	+	0	0
RN14	Residential led	+	0	0
RN16	Residential led	+	---	0
RN17	Residential led	+	---	0
RN18	Residential led	+	-	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
RN19	Residential led	+	0	0
RN2	Residential led (Mixed-use)	+	-	0
RN22	Residential led	+	-	0
RN23	Residential led	+	--	0
RN24	Residential led	+	0	0
RN25	Residential led	+	--	0
RN26	Residential led (Mixed-use)	--	0	--
RN27	Residential led	+	-	0
RN28	Residential led	+	--	0
RN29	Residential led	+	0	0
RN3	Residential led	+	0	0
RN30	Residential led	+	0	0
RN31	Residential led	+	0	0
RN32	Residential led	+	0	0
RN33	Non-residential	+	--	0
RN34	Residential led	+	-	0
RN4	Residential led (Mixed-use)	+	0	0
RN5	Residential led (Mixed-use)	+	--	0
RSE1	Non-residential	+	-	0
RSE11	Non-residential	+	--	0
RSE4	Residential led	+	--	0
RSE8	Residential led (Mixed-use)	+	0	0
RSE9	Residential led	+	--	0
RWB1	Residential led	+	0	--
RWB10	Non-residential	+	--	0
RWB11	Residential led	+	0	0
RWB12	Residential led	+	--	0
RWB14	Residential led	+	--	0
RWB15	Residential led	+	--	0
RWB17	Residential led	+	--	0
RWB18	Residential led	+	--	0
RWB19	Residential led (Mixed-use)	+	--	0
RWB2	Residential led	--	-	0
RWB20	Residential led	+	-	0
RWB21	Residential led	+	0	0
RWB23	Non-residential	-	--	0
RWB25	Residential led	--	-	--
RWB3	Residential led	+	0	0
RWB4	Residential led	+	0	0
RWB5	Non-residential	+	0	0
RWB6	Residential led	+	0	0
RWB8	Residential led (Mixed-use)	+	-	0
RWB9	Residential led (Mixed-use)	+	-	0
SMI1	Residential led	--	0	0
SMI2	Non-residential	--	-	0
SNF1	Residential led	+	--	0
SNF10	Residential led (Mixed-use)	+	-	0
SNF12	Residential led	+	-	0
SNF13	Residential led (Mixed-use)	--	--	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
SNF15	Residential led (Mixed-use)	--	--	0
SNF16	Residential led (Mixed-use)	+	0	0
SNF17	Residential led	+	--	0
SNF18	Residential led (Mixed-use)	--	--	--
SNF19	Non-residential	+	-	0
SNF2	Residential led (Mixed-use)	+	0	0
SNF20	Residential led	+	0	0
SNF21	Residential led (Mixed-use)	--	--	0
SNF22	Residential led (Mixed-use)	--	--	0
SNF23	Residential led (Mixed-use)	--	0	0
SNF24	Residential led (Mixed-use)	--	--	0
SNF25	Non-residential	--	--	--
SNF26	Non-residential	--	-	--
SNF27	Residential led	+	-	0
SNF28	Non-residential	--	--	0
SNF30	Residential led (Mixed-use)	--	--	0
SNF31	Residential led (Mixed-use)	--	-	0
SNF32	Residential led	--	--	0
SNF33	Non-residential	--	--	0
SNF34	Residential led (Mixed-use)	--	--	0
SNF35	Residential led (Mixed-use)	--	--	--
SNF36	Residential led (Mixed-use)	--	-	0
SNF37	Residential led (Mixed-use)	--	--	0
SNF38	Residential led	--	-	0
SNF39	Residential led	--	--	0
SNF41	Residential led (Mixed-use)	--	--	--
SNF43	Residential led	--	-	0
SNF44	Residential led	+	0	0
SNF5	Residential led	+	--	0
SNF6	Residential led	+	0	0
SNF8	Residential led (Mixed-use)	+	0	0
SNF9	Residential led (Mixed-use)	+	0	0
SR1	Residential led	+	0	0
SR10	Residential led	+	0	0
SR13	Residential led	+	0	0
SR14	Residential led	+	-	0
SR15	Residential led	+	--	0
SR16	Residential led	+	--	0
SR18	Residential led (Mixed-use)	+	--	0
SR2	Non-residential	+	-	0
SR21	Residential led	+	-	0
SR22	Residential led	+	0	0
SR24	Residential led	+	--	0
SR25	Residential led	+	-	0
SR27	Residential led	+	0	0
SR29	Non-residential	--	-	0
SR3	Residential led	+	--	0
SR30	Residential led (Mixed-use)	-	--	0
SR31	Residential led (Mixed-use)	--	-	--

Site ref.	Site use	Flood Zones	SWFR	Flood defences
SR32	Residential led (Mixed-use)	+	-	0
SR33	Non-residential	-	0	0
SR34	Residential led	--	0	0
SR35	Non-residential	--	--	--
SR36	Residential led (Mixed-use)	-	--	--
SR37	Residential led (Mixed-use)	--	--	--
SR38	Residential led (Mixed-use)	--	--	--
SR39	Residential led (Mixed-use)	--	0	--
SR4	Residential led	+	--	0
SR40	Residential led (Mixed-use)	+	--	--
SR41	Residential led (Mixed-use)	+	-	0
SR42	Residential led	+	0	0
SR43	Residential led	+	0	0
SR45	Non-residential	+	0	0
SR46	Residential led	+	0	0
SR47	Residential led	+	--	0
SR48	Residential led	--	-	--
SR49	Residential led	--	--	--
SR5	Residential led	+	-	0
SR50	Residential led	--	--	--
SR51	Residential led (Mixed-use)	+	-	0
SR52	Residential led (Mixed-use)	+	--	0
SR6	Residential led (Mixed-use)	+	-	0
SR7	Residential led	+	-	0
SR8	Residential led	+	-	0
SW1	Residential led	+	0	0
SW2	Residential led	+	-	0
SW3	Residential led	+	0	0
SW5	Residential led	+	0	0
SW6	Residential led	+	--	0
SW7	Residential led	+	0	0
SW8	Residential led	+	0	0
T1	Non-residential	+	-	0
T2	Residential led	+	-	0
T3	Residential led	+	-	0
W1	Residential led	+	0	0
W11	Non-residential	+	-	0
W12	Residential led	+	-	0
W13	Non-residential	+	-	0
W14	Non-residential	+	--	0
W3	Residential led	+	--	0
W4	Residential led	+	0	0
W7	Residential led	+	--	0
W8	Residential led	+	0	0

Table 4: Reasonable alternative strategic sites impact matrix for SA Objective 2 – Climate change adaptation (pre-mitigation)

Site ref.	Site use	Flood Zones	SWFR	Flood defences
AS13	Residential led (Mixed-use)	--	--	0
AS21	Residential led (Mixed-use)	+	--	0
AS22	Residential led (Mixed-use)	--	--	0
AS24	Non-residential	--	-	--
AS26	Non-residential	--	-	--
CHR4	Residential led (Mixed-use)	+	--	0
HHH12	Residential led (Mixed-use)	+	-	--
HHH22	Residential led (Mixed-use)	+	--	0
HHH22/HHH31	Residential led (Mixed-use)	--	--	0
HHH26	Residential led (Mixed-use)	+	--	0
HHH3	Residential led	+	--	0
HHH31	Residential led (Mixed-use)	--	--	0
HHH35	Non-residential	--	--	0
HHH36	Non-residential	--	--	--
HHH6	Residential led (Mixed-use)	+	--	0
HW1	Residential led	+	--	0
LW6	Residential led	+	0	0
LW8	Residential led	+	0	0
RN8	Residential led (Mixed-use)	+	-	0
RN9	Residential led	+	-	0
RSE10	Residential led (Mixed-use)	+	0	0
SMI5	Non-residential	--	--	--
SMI6	Residential led (Mixed-use)	--	--	--
SNF3	Residential led	+	--	0
SR17	Residential led (Mixed-use)	+	--	0
SR9	Residential led (Mixed-use)	+	0	0
SR10	Residential led (Mixed-use)	--	--	--

**Table 5: Reasonable alternative non-strategic sites impact matrix for SA Objective 2 – Climate change adaptation (post-mitigation)**

Site ref.	Site use	Flood Zones	SWFR	Flood defences
AS1	Residential led	+	0	0
AS10	Residential led	+	0	0
AS11	Residential led (Mixed-use)	+	0	0
AS14	Residential led	+	0	0
AS15	Residential led	-	0	0
AS16	Residential led (Mixed-use)	+	0	0
AS17	Residential led	-	0	0
AS18	Residential led	+	0	0
AS2	Residential led	+	0	0
AS20	Residential led (Mixed-use)	+	0	0
AS23	Residential led (park homes)	+	0	0
AS25	Residential led	+	0	0
AS28	Residential led	-	0	0
AS29	Residential led	+	0	0
AS3	Residential led	+	0	0
AS5	Residential led (Mixed-use)	+	0	0
AS6	Residential led (Mixed-use)	+	0	0
AS7	Non-residential	+	0	0
AS8	Non-residential	+	0	0
AS9	Non-residential	-	0	0
CCB1	Residential led	+	0	0
CCB10	Residential led (Mixed-use)	+	0	0
CCB11	Residential led	+	0	0
CCB12	Residential led (Mixed-use)	+	0	0
CCB13	Residential led (Mixed-use)	-	0	0
CCB15	Residential led (Mixed-use)	+	0	0
CCB16	Residential led	-	0	0
CCB17	Residential led (Mixed-use)	-	0	0
CCB18	Residential led	+	0	0
CCB19	Residential led (Mixed-use)	+	0	0
CCB2	Residential led (Mixed-use)	+	0	0
CCB20	Residential led (Mixed-use)	-	0	0
CCB21	Residential led (Mixed-use)	-	0	0
CCB22	Residential led	-	0	0
CCB23	Residential led (Mixed-use)	-	0	0
CCB24	Residential led (Mixed-use)	-	0	0
CCB25	Residential led	-	0	0
CCB26	Residential led (Mixed-use)	-	0	0
CCB27	Residential led (Mixed-use)	-	0	0
CCB28	Residential led	+	0	0
CCB29	Residential led	+	0	0
CCB3	Residential led (Mixed-use)	+	0	0
CCB30	Residential led (Mixed-use)	+	0	0
CCB31	Residential led	-	0	0
CCB33	Residential led	+	0	0
CCB34	Residential led (Mixed-use)	+	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
CCB35	Non-residential	-	0	0
CCB36	Residential led (Mixed-use)	+	0	0
CCB37	Residential led (Mixed-use)	+	0	0
CCB38	Residential led	+	0	0
CCB39	Residential led	+	0	0
CCB4	Residential led	+	0	0
CCB40	Residential led	+	0	0
CCB41	Residential led	+	0	0
CCB43	Residential led	-	0	0
CCB44	Residential led	+	0	0
CCB46	Residential led	+	0	0
CCB48	Residential led	+	0	0
CCB49	Residential led	+	0	0
CCB5	Non-residential	-	0	0
CCB6	Residential led (Mixed-use)	+	0	0
CCB7	Residential led (Mixed-use)	-	0	0
CCB8	Residential led	-	0	0
CCB9	Residential led	+	0	0
CHR1	Residential led	+	0	0
CHR10	Residential led	+	0	0
CHR11	Residential led	+	0	0
CHR13	Residential led (Gypsy and Traveller)	+	0	0
CHR14	Residential led (Mixed-use)	-	0	0
CHR15	Non-residential	+	0	0
CHR16	Non-residential	+	0	0
CHR17	Non-residential	+	0	0
CHR18	Non-residential	+	0	0
CHR19	Non-residential	+	0	0
CHR2	Non-residential	+	0	0
CHR20	Residential led	-	0	0
CHR21	Non-residential	-	0	0
CHR3	Non-residential	+	0	0
CHR5	Non-residential	+	0	0
CHR6	Residential led	+	0	0
CHR7	Residential led	+	0	0
CHR8	Non-residential	-	0	0
FH1	Non-residential	+	0	0
FP1	Residential led	+	0	0
FP10	Residential led	+	0	0
FP11	Residential led (Mixed-use)	-	0	0
FP12	Residential led	+	0	0
FP14	Residential led	+	0	0
FP16	Residential led (Mixed-use)	+	0	0
FP17	Residential led	+	0	0
FP18	Residential led	-	0	0
FP19	Residential led	+	0	0
FP2	Residential led	-	0	0
FP22	Residential led	+	0	0
FP23	Residential led	-	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
FP25	Residential led (Mixed-use)	+	0	0
FP4	Residential led	-	0	0
FP5	Residential led	-	0	0
FP6	Residential led	+	0	0
FP7	Residential led	-	0	0
FP8	Residential led	+	0	0
FP9	Residential led	-	0	0
GN10	Residential led	+	0	0
GN11	Residential led	+	0	0
GN13	Residential led	-	0	0
GN14	Residential led	-	0	0
GN15	Residential led (Mixed-use)	-	0	0
GN3	Residential led	-	0	0
GN4	Residential led	-	0	0
GN5	Residential led	+	0	0
GN6	Residential led (Mixed-use)	-	0	0
GN8	Residential led	+	0	0
GS1	Residential led	+	0	0
GS10	Residential led (Mixed-use)	+	0	0
GS11	Residential led	+	0	0
GS12	Residential led (Mixed-use)	+	0	0
GS13	Residential led	+	0	0
GS14	Residential led (Mixed-use)	+	0	0
GS18	Residential led (Mixed-use)	+	0	0
GS19	Residential led	+	0	0
GS2	Residential led	+	0	0
GS20	Residential led	+	0	0
GS23	Residential led	+	0	0
GS24	Residential led	+	0	0
GS26	Residential led	+	0	0
GS27	Residential led (Mixed-use)	+	0	0
GS29	Residential led	+	0	0
GS30	Residential led	+	0	0
GS32	Residential led	+	0	0
GS33	Residential led	+	0	0
GS34	Residential led	+	0	0
GS35	Residential led	+	0	0
GS37	Residential led (Mixed-use)	+	0	0
GS4	Residential led	+	0	0
GS5	Residential led	+	0	0
GS6	Residential led	+	0	0
GS7	Residential led (Mixed-use)	+	0	0
GS8	Residential led (Mixed-use)	+	0	0
HHH1	Non-residential	+	0	0
HHH11	Residential led	+	0	0
HHH14	Residential led	+	0	0
HHH15	Residential led	+	0	0
HHH16	Non-residential	+	0	0
HHH17	Residential led	+	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
HHH18	Residential led (Mixed-use)	+	0	0
HHH19	Non-residential	+	0	0
HHH21	Non-residential	-	0	0
HHH23	Residential led (Mixed-use)	+	0	0
HHH24	Residential led	+	0	0
HHH25	Residential led	+	0	0
HHH28	Residential led (Mixed-use)	+	0	0
HHH29	Residential led (Mixed-use)	+	0	0
HHH30	Residential led (Mixed-use)	-	0	0
HHH32	Residential led	-	0	0
HHH33	Residential led	+	0	0
HHH37	Non-residential	-	0	0
HHH38	Non-residential	-	0	0
HHH39	Non-residential	+	0	0
HHH4	Residential led	+	0	0
HHH40	Residential led	+	0	0
HHH41	Residential led	+	0	0
HHH5	Residential led	+	0	0
HHH7	Residential led	+	0	0
HHH8	Residential led (Mixed-use)	+	0	0
HHH9	Residential led	+	0	0
HW11	Residential led	+	0	0
HW3	Residential and secondary school	+	0	0
HW5	Non-residential	+	0	0
HW6	Residential led	+	0	0
HW7	Residential or non-residential	+	0	0
HW8	Residential led	+	0	0
L11	Residential led	+	0	0
L12	Residential led	+	0	0
L2	Residential led	+	0	0
L3	Residential led	+	0	0
L7	Residential led	+	0	0
L9	Residential led	+	0	0
LW10	Residential led	+	0	0
LW2	Residential led	+	0	0
LW3	Residential led	+	0	0
LW4	Residential led	+	0	0
LW5	Residential led (C2 use)	+	0	0
LW7	Residential led	+	0	0
PP1	Residential led	+	0	0
REWW3	Residential led	+	0	0
RN1	Residential led	-	0	0
RN10	Residential led	+	0	0
RN11	Residential led	+	0	0
RN12	Non-residential	+	0	0
RN14	Residential led	+	0	0
RN16	Residential led	+	0	0
RN17	Residential led	+	0	0
RN18	Residential led	+	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
RN19	Residential led	+	0	0
RN2	Residential led (Mixed-use)	+	0	0
RN22	Residential led	+	0	0
RN23	Residential led	+	0	0
RN24	Residential led	+	0	0
RN25	Residential led	+	0	0
RN26	Residential led (Mixed-use)	-	0	0
RN27	Residential led	+	0	0
RN28	Residential led	+	0	0
RN29	Residential led	+	0	0
RN3	Residential led	+	0	0
RN30	Residential led	+	0	0
RN31	Residential led	+	0	0
RN32	Residential led	+	0	0
RN33	Non-residential	+	0	0
RN34	Residential led	+	0	0
RN4	Residential led (Mixed-use)	+	0	0
RN5	Residential led (Mixed-use)	+	0	0
RSE1	Non-residential	+	0	0
RSE11	Non-residential	+	0	0
RSE4	Residential led	+	0	0
RSE8	Residential led (Mixed-use)	+	0	0
RSE9	Residential led	+	0	0
RWB1	Residential led	+	0	0
RWB10	Non-residential	+	0	0
RWB11	Residential led	+	0	0
RWB12	Residential led	+	0	0
RWB14	Residential led	+	0	0
RWB15	Residential led	+	0	0
RWB17	Residential led	+	0	0
RWB18	Residential led	+	0	0
RWB19	Residential led (Mixed-use)	+	0	0
RWB2	Residential led	-	0	0
RWB20	Residential led	+	0	0
RWB21	Residential led	+	0	0
RWB23	Non-residential	+	0	0
RWB25	Residential led	-	0	0
RWB3	Residential led	+	0	0
RWB4	Residential led	+	0	0
RWB5	Non-residential	+	0	0
RWB6	Residential led	+	0	0
RWB8	Residential led (Mixed-use)	+	0	0
RWB9	Residential led (Mixed-use)	+	0	0
SMI1	Residential led	-	0	0
SMI2	Non-residential	-	0	0
SNF1	Residential led	+	0	0
SNF10	Residential led (Mixed-use)	+	0	0
SNF12	Residential led	+	0	0
SNF13	Residential led (Mixed-use)	-	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
SNF15	Residential led (Mixed-use)	-	0	0
SNF16	Residential led (Mixed-use)	+	0	0
SNF17	Residential led	+	0	0
SNF18	Residential led (Mixed-use)	-	0	0
SNF19	Non-residential	+	0	0
SNF2	Residential led (Mixed-use)	+	0	0
SNF20	Residential led	+	0	0
SNF21	Residential led (Mixed-use)	-	0	0
SNF22	Residential led (Mixed-use)	-	0	0
SNF23	Residential led (Mixed-use)	-	0	0
SNF24	Residential led (Mixed-use)	-	0	0
SNF25	Non-residential	-	0	0
SNF26	Non-residential	-	0	0
SNF27	Residential led	+	0	0
SNF28	Non-residential	-	0	0
SNF30	Residential led (Mixed-use)	-	0	0
SNF31	Residential led (Mixed-use)	-	0	0
SNF32	Residential led	-	0	0
SNF33	Non-residential	-	0	0
SNF34	Residential led (Mixed-use)	-	0	0
SNF35	Residential led (Mixed-use)	-	0	0
SNF36	Residential led (Mixed-use)	-	0	0
SNF37	Residential led (Mixed-use)	-	0	0
SNF38	Residential led	-	0	0
SNF39	Residential led	-	0	0
SNF41	Residential led (Mixed-use)	-	0	0
SNF43	Residential led	-	0	0
SNF44	Residential led	+	0	0
SNF5	Residential led	+	0	0
SNF6	Residential led	+	0	0
SNF8	Residential led (Mixed-use)	+	0	0
SNF9	Residential led (Mixed-use)	+	0	0
SR1	Residential led	+	0	0
SR10	Residential led	+	0	0
SR13	Residential led	+	0	0
SR14	Residential led	+	0	0
SR15	Residential led	+	0	0
SR16	Residential led	+	0	0
SR18	Residential led (Mixed-use)	+	0	0
SR2	Non-residential	+	0	0
SR21	Residential led	+	0	0
SR22	Residential led	+	0	0
SR24	Residential led	+	0	0
SR25	Residential led	+	0	0
SR27	Residential led	+	0	0
SR29	Non-residential	-	0	0
SR3	Residential led	+	0	0
SR30	Residential led (Mixed-use)	-	0	0
SR31	Residential led (Mixed-use)	-	0	0

Site ref.	Site use	Flood Zones	SWFR	Flood defences
SR32	Residential led (Mixed-use)	+	0	0
SR33	Non-residential	-	0	0
SR34	Residential led	-	0	0
SR35	Non-residential	-	0	0
SR36	Residential led (Mixed-use)	-	0	0
SR37	Residential led (Mixed-use)	-	0	0
SR38	Residential led (Mixed-use)	-	0	0
SR39	Residential led (Mixed-use)	-	0	0
SR4	Residential led	+	0	0
SR40	Residential led (Mixed-use)	+	0	0
SR41	Residential led (Mixed-use)	+	0	0
SR42	Residential led	+	0	0
SR43	Residential led	+	0	0
SR45	Non-residential	+	0	0
SR46	Residential led	+	0	0
SR47	Residential led	+	0	0
SR48	Residential led	-	0	0
SR49	Residential led	-	0	0
SR5	Residential led	+	0	0
SR50	Residential led	-	0	0
SR51	Residential led (Mixed-use)	+	0	0
SR52	Residential led (Mixed-use)	+	0	0
SR6	Residential led (Mixed-use)	+	0	0
SR7	Residential led	+	0	0
SR8	Residential led	+	0	0
SW1	Residential led	+	0	0
SW2	Residential led	+	0	0
SW3	Residential led	+	0	0
SW5	Residential led	+	0	0
SW6	Residential led	+	0	0
SW7	Residential led	+	0	0
SW8	Residential led	+	0	0
T1	Non-residential	+	0	0
T2	Residential led	+	0	0
T3	Residential led	+	0	0
W1	Residential led	+	0	0
W11	Non-residential	+	0	0
W12	Residential led	+	0	0
W13	Non-residential	+	0	0
W14	Non-residential	+	0	0
W3	Residential led	+	0	0
W4	Residential led	+	0	0
W7	Residential led	+	0	0
W8	Residential led	+	0	0

Table 6: Reasonable alternative strategic sites impact matrix for SA Objective 2 – Climate change adaptation (post-mitigation)

Site ref.	Site use	Flood Zones	SWFR	Flood defences
AS13	Residential led (Mixed-use)	-	0	0
AS21	Residential led (Mixed-use)	+	0	0
AS22	Residential led (Mixed-use)	-	0	0
AS24	Non-residential	-	0	0
AS26	Non-residential	-	0	0
CHR4	Residential led (Mixed-use)	+	0	0
HHH12	Residential led (Mixed-use)	+	0	0
HHH22	Residential led (Mixed-use)	+	0	0
HHH22/HHH31	Residential led (Mixed-use)	-	0	0
HHH26	Residential led (Mixed-use)	+	0	0
HHH3	Residential led	+	0	0
HHH31	Residential led (Mixed-use)	-	0	0
HHH35	Non-residential	-	0	0
HHH36	Non-residential	-	0	0
HHH6	Residential led (Mixed-use)	+	0	0
HW1	Residential led	+	0	0
LW6	Residential led	+	0	0
LW8	Residential led	+	0	0
RN8	Residential led (Mixed-use)	+	0	0
RN9	Residential led	+	0	0
RSE10	Residential led (Mixed-use)	+	0	0
SMI5	Non-residential	-	0	0
SMI6	Residential led (Mixed-use)	-	0	0
SNF3	Residential led	+	0	0
SR17	Residential led (Mixed-use)	+	0	0
SR9	Residential led (Mixed-use)	+	0	0
SR53	Residential led (Mixed-use opportunity area)	+/-	0	0

### **Likely significant effects of the MLP**

27. Of the 46 non-strategic reasonable alternative sites where alterations to the assessment score for surface water flood risk have been identified (**Table 2**), 12 are among those allocated in the Regulation 19 MLP (AS25, CCB15, CCB19, CCB21, CCB41, FP6, SNF17, SNF20, SNF27, SNF8, SNF9, SR48).
28. Chapter 9 of the Regulation 19 SA Report identified that allocated sites coincide with varying extents of surface water flood risk. The updated data indicates a marginal change in the total number of allocated sites affected (from 83 to 85), with a slight reduction in those intersecting high-risk areas (from 34 to 33). The mitigation measures set out in Table 9.2 of the Regulation 19 SA and the resulting residual effects remain unchanged.
29. The Regulation 19 SA concluded that, subject to implementation of the SFRA recommendations and completion of site-specific flood risk assessments, no significant adverse effects are anticipated in relation to fluvial, tidal, or surface water flood risk. It further notes that MLP policies will ensure appropriate protection of existing flood defences and delivery of new defences where required as part of the Medway Estuary and Swale (MEAS) strategy.
30. The updated evidence does not alter the conclusions of the Regulation 19 SA in relation to flood risk.

### **Conclusion**

31. This Technical Note has reviewed updated SFRA flood risk data to determine whether any changes are triggered to the findings of the Regulation 19 SA.
32. The review confirms that fluvial flood risk remains unchanged across all assessed sites, with no changes to Flood Zone extents. Minor localised refinements to surface water flood risk extents have been identified for a small proportion of non-strategic sites, resulting in changes to SA site assessments where updated extents cross defined assessment thresholds.
33. These changes do not result in any material alteration to the findings of the SA or the significance of effects identified.
34. On this basis, the conclusions of the Regulation 19 SA remain valid and no updates to the assessment findings are required in relation to flood risk.