Medway Local Plan 2041 Examination

Matter 13 – Site Allocations (Policies SA1-SA14)

Hearing Statement

Medway Council

Issues

- **Whether the site allocation strategy for Capstone Valley, Hoo St Werburgh and Chattenden, High Halstow, Lower Rainham and the Rural Settlements is justified by proportionate evidence, positively prepared and capable of delivery within the Plan period.**
- **Whether the allocations are supported by adequate infrastructure, environmental mitigation and necessary safeguards relating to biodiversity, landscape, heritage, transport, flood risk and other constraints.**
- **Whether the policies provide a clear and effective framework for decision making and are consistent with national planning policy.**

Introduction

This Hearing Statement has been prepared in response to the Inspectors' Matters, Issues and Questions for Phase 2 of the Examination of the Medway Local Plan 2041.

The Council's answers are set out under each question raised by the Inspectors. References are given to the submitted Plan, examination documents, evidence base documents and statements of common ground where relevant.

For ease of navigation, this Hearing Statement includes bookmarks and a linked table of contents.

Where the Council considers modifications necessary to improve effectiveness, clarity or consistency with national policy, these are identified in this Hearing Statement.

Artificial Intelligence

Artificial Intelligence (AI) was used to assist in the preparation of this Hearing Statement.

Specifically, Microsoft 365 Copilot (GPT-based large language model) was used to assist with drafting, editing and refining text, improving structure and summarising planning policy and guidance in the Council's responses to questions relating to the first set of general questions (13.1 to 13.5) and policies SA4, SA6, SA7, SA9, SA10 and SA13.

The source material used by the AI system comprised publicly available planning documents and information provided by the Council's officers, including the Plan (ref: A1), submitted evidence base documents, the National Planning Policy Framework (2024), Planning Practice Guidance and the Inspectors' Matters, Issues and Questions.

AI was used solely as a drafting and editorial aid. All factual content, planning judgements, conclusions, references, quotations and positions presented in this Hearing Statement have been reviewed, checked and approved by the Council. The Council accepts full responsibility for the content of this submission.

Table of Contents

Issues 1

Introduction 1

Artificial Intelligence 1

Questions 18

General 18

13.1 What is the role of the Council in the delivery of the site allocations, over the Plan Period, in terms of what mechanisms, delivery vehicles and infrastructure provision arrangements it has, or will, put in place? 18

13.2 Following on from discussions at the Phase 1 Hearings in particular in relation to flood risk, please provide updated 'Plan Period (Years)' in the site-specific information tables for each allocation. 18

13.3 Under the site-specific information tables for each site, how have the capacities been derived for the individual sites? 19

13.4 Under the site-specific information tables for each site, how has the plan period for delivery been decided for each site? 19

13.5 Under the site-specific information tables for each site, how have infrastructure and utilities requirements been considered in the plan period for delivery, including any related flexibility? 19

Policy SA1: Chatham Town Centre and Surrounds 20

13.6 Is Policy SA1 consistent with Policy S17: Chatham Town Centre? 20

13.7 Is there duplication between Policy SA1 and Policy S17, and does this impact on the effectiveness of the policy? 21

13.8 How has the circa 1,350 capacity for the strategic allocation been derived (criterion 3.)? 21

13.9 Why is housing mix and affordable housing a criterion (5.) specifically for this strategic allocation under Policy SA1? 23

13.10 Noting the reference to an Air Quality Management Area under Policy SA1, does air quality (criterion 9.) have the potential to impact on deliverability? 23

13.11 Why does Site FP25 provide an opportunity to reveal much about the history of Chatham (criterion 10.b) and why is a masterplan required for this site (criterion 13.)? 25

13.12 Is the provision of green-blue infrastructure and suitable walking and cycling links a specific issue for this site allocation (criterion 11.) and what would be required? 26

13.13 Is criterion 12. of Policy SA1 formatted and worded in the way which is intended? 28

13.14 Why is a heritage, townscape and visual impact assessment required for sites CCB49 and GS2 (criterion 14.), but not for sites FP10 and FP25 (criterion 10.)? 28

13.15 Where 'flood risk assessment' is identified under Policy SA1 (criterion 15.) what does this mean as regards a design principle (the sub-heading)?....29

13.16 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/3b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA1, as set out in its Phase 1 Hearing Statement. 29

13.17 Under the 'Site-specific Information table', will any of the sites involve the relocation of the existing uses, and will this have a bearing on deliverability? 32

Policy SA2: Heritage-led Sites 33

13.18 How have these 2 strategic heritage-led sites been derived, and their overall capacities decided on? 33

13.19 Policy SA2 includes a number of supporting documents, including the Interface Land Supplementary Planning Document, the Star Hill to Sun Pier Development Framework and a Conservation Area Appraisal. Is it intended these documents would be elevated in status to become part of the development plan by virtue of their inclusion within the policy? 35

13.20 Under the 'Site-specific Information table', what mixed-use would site ref: CCB35 be put to? 36

13.21 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/3b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA2, as set out in its Phase 1 Hearing Statement. 37

13.22 Under the 'Site-specific Information table', will any of the sites require upfront archaeological work and, if so, will this have a bearing on deliverability and a need for flexibility? 39

13.23 Please clarify if a main modification is in fact proposed to this policy to address potential impacts on the North Downs Woodland Special Area of Conservation (SAC) south of Lidsing, as referred to in the Council's Response to the Inspectors' Initial Queries (MLP/ED6) (page 3, under 6.) and its Phase 1 Hearing Statement on Matter 6 Natural Environment (6.12.3)? 40

13.24 How was the effect of the Interface land allocations considered on the operational activities of the Chatham Dockyard, including its basins? 41

Policy SA3: Gillingham District Centre 43

13.25 Is Policy SA3 consistent with Policy S19: Gillingham District Centre? 43

13.26 Is there duplication between Policy SA3 and Policy S19 and does this impact on the effectiveness of the policy? 44

13.27 How has the circa 100 new homes capacity for this strategic allocation been derived (criterion 3.)? 44

13.28 Where Policy SA3 states 'demonstrate compliance with relevant guidance' (criterion 10.) as the sole design principle, is this an effective way to plan for these sites in terms of what might be required? 45

13.29 How does the policy address potential impacts on the North Downs Woodland SAC south of Lidsing, as referred to in the Council's Response to the Inspectors' Initial Queries (MLP/ED6) (page 3, under 6.) which refers to this site? ..46

Policy SA4: River Waterfront 47

13.30 Is the riverside walk that Policy SA4 envisages will be provided (criterion 1.) shown on Figure 11: River Waterfront Concept Plan? 47

13.31 How has the circa 4,197 capacity for this strategic allocation been derived (criterion 2.)? 48

13.32 Why is Policy SA4 not more specific on building heights (criterion 6.), in terms of whether the approach which is proposed would be justified and effective? 49

13.33 Who would be responsible for the green-blue infrastructure strategy under Policy SA4 (criterion 7.) for this strategic allocation? 50

13.34 Where Policy SA4 states that the urban context will not provide for adequate space to meet all of the requirements for open space and playing pitch provision (criterion 8.), does that mean that less than the required provision under Policy DM21: New Open Space, Outdoor Sports and Play Spaces will be provided for open space and playing pitch provision on this strategic allocation? 51

13.35 Who would be responsible for the development brief for site SM16 (criterion 14.) and please explain why this site appears to be split on the Policies Map (two 'SM16' notations)? 52

13.36 Who would be responsible for the masterplans and infrastructure delivery plans/phasing plans (criteria 15. to 18.)? 54

13.37 Which of these plans would be site specific and which would be strategic allocation wide? 55

13.38 Is the potential funding from Homes England agreed (criterion 22.) and do these requirements need to be fulfilled for development to proceed on (any) of the sites under Policy SA4? 56

13.39 Do the Policy SA4 criteria provide appropriate safeguards for heritage assets and ecological designations that may be impacted? 57

13.40 Do the Policy SA4 criteria provide appropriate safeguards for riverboat moorings, or else for their affordable re-provision for their residents? 58

13.41 Under the 'Site-specific Information table', why is the number of new homes provided less than the overall number under the strategic allocation (criterion 2.) by approximately 200 units? 59

13.42 Under the 'Site-specific Information table', would site GN6 be delivered within the first 5 years of the plan period, as Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6) indicates there would be no completions within the first 5 years?....59

13.43 Under the 'Site-specific Information table' and Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6), site SM16 is in part to be delivered beyond the plan period. Have these units been included, or excluded from, the Plan's housing supply figures? 61

13.44 Under the 'Site-specific Information table', will any of the sites involve the relocation of the existing uses, including employment and tenancies, and will this have a bearing on deliverability? 61

13.45 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA4, as set out in its Phase 1 Hearing Statement. 62

Policy SA5: Strood Town Centre and Surrounds....64

13.46 Is Policy SA5 consistent with Policy S20: Strood District Centre? 64

13.47 Is there duplication between Policy SA5 and Policy S20, and does this impact on the effectiveness of the policy? 64

13.48 How has the circa 1,079 capacity for this strategic allocation been derived (criterion 3.)? 65

13.49 Policy SA5 includes a number of supporting documents, including the Strood Waterfront Development Brief and a Town Centre Masterplan. Is it intended these documents would be elevated in status to become part of the development plan by virtue of their inclusion within the policy? 66

13.50 The supporting text (paragraph 14.6.2) states that the Strood Waterfront Development Brief is being revisited. What bearing does that have on Policy SA5? 67

13.51 At what stage would the transport interchange and bus corridor (criterion 6.) be provided and how would this relate to the development of this strategic allocation and individual sites? 68

13.52 At what stage would the railway station improvements (criterion 7.) be provided and how would this relate to the development of this strategic allocation and individual sites? 69

13.53 Are the transport improvements proposed for this strategic allocation shown on the Policies Maps? 70

13.54 Why does the increase in housing provision lead to a healthy living centre requirement at site SNF20 (criterion 9.) as this site is only allocated for circa 15 units under the Site-specific Information table'? 70

13.55 To what extent have healthcare requirements been considered in Policy SA5, including evidence? 72

13.56 Why do certain sites (criterion 14.) require a masterplan? 72

13.57 Do the criteria provide appropriate safeguards for heritage assets that may be impacted? 74

13.58 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/3b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA5, as set out in its Phase 1 Hearing Statement. 75

Policy SA6: Land West of Strood 78

13.59 How has the circa 1,280 capacity for this strategic allocation been derived (criterion 3.)? 78

13.60 Is the location of this strategic allocation consistent with national policy as regards encouraging modes of transport other than the motor car? 79

13.61 What ecology evidence has been used in the preparation of Policy SA6? 81

13.62 What affordable housing requirement (criterion 3. c) is the policy setting for this strategic allocation? 82

13.63 Why are proposals for this strategic allocation to be landscape based (criterion 4.)? 83

13.64 Who will be responsible for producing the green-blue infrastructure strategy (criterion 5.) for this strategic allocation? 84

13.65 Do the specific requirements for the strategic allocation set out in Policy SA6 (in particular, criteria 6. to 11.) concern only land in Medway? 85

13.66 Does Figure 12: Land West of Strood Concept Plan accurately show where infrastructure would be provided as regards Medway? 87

13.67 Has the provision of such infrastructure requirements been considered when the circa site capacity has been derived under Policy SA6? 88

13.68 How are these infrastructure requirements justified, in respect of evidence? 88

13.69 What proportion of the costs for infrastructure requirements under Policy SA6 are to be met by way of section 106 agreement, as per Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6). 89

13.70 Is there an updated position as regards application dates, as per Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6)? 90

13.71 Who would be responsible for the delivery of the infrastructure delivery plan under the policy (criterion 14.)? 90

13.72 Are the 'other TBD' land uses that are referenced in sites SNF1 and SNF3 those which are listed under Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6) for SNF1 and SNF3 (and SR5)? 91

13.73 How did the Sustainability Appraisal (SA) (A3.1 to A3.3) consider SNF1, SNF3 and SR5, both individually and collectively? Please provide the related paragraph references in the SA. 92

13.74 Where the Statement of Common Ground with National Highways (MLP/ED20) (page 17, last paragraph of bullet point 'Site Allocations') refers to where any other site allocations which are located in proximity to the M2 Junction 1 should include this improvement, does this include the SA6 allocation and how is this reflected in the policy? 93

13.75 Can the M2 Junction 1 accommodate the additional traffic associated with the SA6 Allocation and please provide an associated update where matters are still under discussion with National Highways, as per the Statement of Common Ground with National Highways (MLP/ED20) (paragraph 2.8.2)? 94

Policy SA7: Capstone Valley 95

13.76 What evidence demonstrates that the scale of development proposed (up to 3,958 new homes) within Capstone Valley is justified having regard to the spatial development strategy and reasonable alternatives? 95

13.77 How were the allocated sites selected and what alternatives were considered and discounted? 96

13.78 How does Policy SA7 contribute towards the housing, infrastructure and environmental objectives of the Plan? 97

13.79 What evidence demonstrates that the proposed quantum and form of development can be accommodated without unacceptable harm to the landscape character of Capstone Valley? 98

13.80 How have the findings of the Landscape Character Assessment (B7), Green Infrastructure evidence and Sustainability Appraisal (A3.1 to A3.3) informed the allocation? 100

13.81 Are the green infrastructure requirements sufficiently clear and deliverable? 101

13.82 How will strategic green infrastructure and ecological corridors be secured and managed over the Plan period? 102

13.83 What transport evidence supports the allocation? 102

13.84 Is there sufficient capacity within the local highway network to accommodate the scale of development proposed? 103

13.85 What highway mitigation measures are required and how will they be funded and delivered? 103

13.86 What education, health, utilities and other infrastructure requirements have been identified as required and how will they be delivered? 104

13.87 Have cumulative impacts with other allocations been fully assessed? 105

13.88 How will infrastructure provision relating to Policy SA7 be phased alongside development? 105

13.89 Are there any significant viability, land ownership or deliverability constraints? 107

13.90 Are the site-specific allocations within Policy SA7 deliverable within the anticipated timescales set out in the housing trajectory? 108

13.91 Is Policy SA7 overall positively prepared, justified, effective and consistent with national policy? 108

Policy SA8: Hoo St Werburgh and Chattenden 109

13.92 What is the justification for directing a significant proportion of growth (circa. 4,700 new homes) to Hoo St Werburgh and Chattenden? 109

13.93 How does the allocation accord with the Plan's settlement hierarchy and spatial development strategy? 110

13.94 What reasonable alternatives were considered and why were they discounted? 112

13.95 What evidence demonstrates that the transport network can accommodate the scale of development proposed? 112

13.96A What are the key transport infrastructure requirements for Policy SA8? ..114

13.96B What are the key dependencies for delivery of transport improvements and are they funded and committed? 115

13.97 Have National Highways and public transport providers confirmed that the proposed mitigation is sufficient? 116

13.98 What are the consequences to the delivery of SA8 if key transport infrastructure is delayed or does not come forward? 117

13.99 How have impacts on internationally and nationally designated ecological sites been assessed? 118

13.100 What mitigation measures are necessary in respect of recreation pressure, air quality and wider ecological impacts? 119

13.101 Is there sufficient certainty that these mitigation measures can be secured? 120

13.102 What evidence demonstrates that water resources and wastewater infrastructure can support the scale of development proposed? 121

13.103 What assessment has been undertaken of the impact of development on the historic environment, including Chattenden Conservation Area, listed buildings and archaeological interests? 121

13.104 What evidence demonstrates that the allocation is achievable and viable? 122

13.105 What are the principal risks to delivery and how have they been addressed? 123

13.106 How will the comprehensive development of the area be secured? 124

Policy SA9: High Halstow 125

13.107 What is the justification for the scale of development (up to 820 new homes) proposed at High Halstow? 125

13.108 How does the allocation support the overall spatial development strategy and the role of High Halstow within it? 126

13.109 What assessment has been undertaken of landscape character impacts and how has Policy SA9 sought to maintain the character and identity of High Halstow? 127

13.110 How will Policy SA9 avoid unacceptable harm to the character and identity of High Halstow? 129

13.111 Are the proposed landscape buffers and safeguards justified and effective and are they sufficient to avoid unacceptable coalescence, encroachment into the countryside or harm to local character? 129

13.112 What evidence demonstrates that local services, facilities and infrastructure can support the proposed growth set out within Policy SA9? 130

13.113 What infrastructure improvements are required and how and when will they be delivered? 131

13.114 What assessment has been undertaken regarding impacts on ecology and heritage assets?.....132

13.115 Are the mitigation measures identified within the policy justified, effective and deliverable? 134

13.116 Are there any ownership, environmental or infrastructure constraints identified that could affect delivery of the scale of development proposed on the allocated sites within Policy SA9 (HHH26, HHH29 and HHH15)? 134

13.117 Are the component sites of SA9 available, suitable, viable and achievable within the anticipated timescales as set out in the housing trajectory? 135

13.118 What delivery assumptions concerning Policy SA9 underpin its position within the housing trajectory and are they realistic? 136

Policy SA10: Lower Rainham 137

13.119 What evidence demonstrates that the level of development at Lower Rainham (up to 863 new homes), as set out within Policy SA10, represents the most appropriate strategy when considered against reasonable alternatives?....137

13.120 What reasonable alternatives were considered and why were the allocated sites selected? 138

13.121 What role does Lower Rainham, and its component site allocations (RN9, RN17, RN23 and RN25) play in contributing to and delivering the Plan's wider development strategy?.....139

13.122 How do the individual site allocations at RN9, RN17, EN23 and RN25 and the overall SA10 allocation relate to the existing urban area and settlement pattern?.....139

13.123 Are the proposed development limits and site boundaries justified?.....139

13.124 What evidence is there to demonstrates that the allocations in Policy SA10 can be developed both individually and cumulatively without unacceptable effects on landscape character?.....140

13.125 How have heritage assets, their settings and archaeological interests informed the overall allocation within Policy SA10? 141

13.126 How will important views, green infrastructure assets and heritage interests be protected or enhanced? 142

13.127 Are the policy requirements within Policy SA10 sufficiently precise to secure those outcomes? 142

13.128 What transport improvements are required to support the development within the allocation? 143

13.129 How will sustainable travel choices be promoted? 143

13.130 Is the necessary infrastructure deliverable within the timescales envisaged? 143

13.131 Are there any significant constraints relating to viability, land ownership, flood risk, contamination or infrastructure provision? 144

13.132 Is the allocation set out in Policy SA10 capable of being delivered during the Plan period and as set out in the housing trajectoy? 144

Policy SA11: Rural Settlements 144

13.133 What is the justification for the overall approach to growth in the rural settlements? 144

13.134 How does the distribution of growth, as set out in Policy SA11, relate to the settlement hierarchy and wider spatial development strategy of the Plan? 146

13.135 How were individual sites selected and what alternatives were considered? 147

13.136 Is the scale of growth proposed for each settlement proportionate to its role, function and level of services? 148

13.137 What evidence supports the distribution of development between the various settlements? 151

13.138 What assessment has been undertaken of cumulative impacts arising from the allocations across the rural settlements? 152

13.139 How have impacts on landscape character, biodiversity, heritage assets and the setting of settlements been assessed and taken into account? 153

13.140 Are mitigation measures identified within Policy SA11, in reference to Policies S2 and S3, effective and deliverable? 156

13.141 Can existing local infrastructure, services and facilities accommodate the proposed growth? 157

13.142 What improvements to existing infrastructure are required and how will they be secured? 158

13.143 Have the implications for highway safety and accessibility been adequately assessed? 160

13.144 Have education, healthcare and wastewater implications been adequately assessed and addressed? 162

13.145 Are all allocated sites within Policy SA11 available, suitable and achievable? 163

13.146 What evidence demonstrates that development can be delivered within the Plan period and in accordance with the housing trajectory? 164

13.147 Does Policy SA11 provide a sufficiently clear and effective framework for decision-making? 165

Conclusion 167

References 168

Policy SA12: Other Sites 168

13.148 What is the purpose of Policy SA12 and how do the allocations for development identified within it (up to 881 new homes) contribute towards the spatial development strategy of the Plan? 168

13.149 What methodology was used to identify and select the sites included within Policy SA12? 171

13.150 Were reasonable alternatives considered and, if so, on what basis were the selected sites preferred? 172

13.151 Are the boundaries of the individual allocations justified and clearly defined? 173

13.152 What evidence demonstrates that the allocated sites are suitable for the uses proposed? 175

13.153 Have all significant physical, environmental and infrastructure constraints been identified, adequately assessed and appropriate mitigation addressed? 176

13.154 Are there any site-specific constraints that could affect the deliverability of the allocations? 177

13.155 What assessment has been undertaken of landscape and townscape effects? 181

13.156 Are the policy requirements for the site allocations identified within Policy SA12 sufficiently clear to secure appropriate mitigation and enhancement measures? 184

13.157 What infrastructure is required to support the development proposed and how is this identified within the Plan? 185

13.158 How and when will the necessary infrastructure be delivered? 186

13.159 Are all the site allocations within Policy SA12 viable, suitable, available and deliverable within the Plan period? 187

13.160 Does Policy SA12 provide a sufficiently clear and effective framework for decision-making? 189

Conclusion 190

References 191

General Questions for Policies SA7 - SA12 192

13.161 Taking Policies SA7 to SA12 collectively, is there sufficient certainty that the necessary transport, utilities, water, wastewater, education, healthcare, green infrastructure and environmental mitigation measures will be delivered in step with development? 192

13.162 Is the cumulative impact of the allocations on the strategic road network, designated ecological sites, landscape character, infrastructure provision and public services adequately understood and addressed? 192

13.163 Are any main modifications necessary to ensure the allocations within Policies SA7 to SA12 are effective, justified and consistent with national policy? 192

Policy SA13: Frindsbury Peninsula Opportunity Area 193

13.164 What is the intended role of the Frindsbury Peninsula Opportunity Area (FPOA) within the spatial development strategy for Medway? 193

13.165 What evidence supports the identification of the FPOA as a strategic opportunity location? 194

13.166 How does the allocation of the FPOA within Policy SA13 contribute towards the Plan's housing, employment and regeneration objectives? 195

13.167 How will comprehensive masterplanning and coordinated delivery be achieved across the FPOA? Will this be through the Frindsbury Peninsula Development Framework? 196

13.168 Are the policy requirements sufficiently clear regarding the expected form, scale and mix of development? 197

13.169 How will landownership and delivery arrangements affect implementation? 198

13.170 What assessment has been undertaken regarding impacts upon internationally, nationally and locally designated ecological sites? 199

13.171 How will impacts on the Thames, Medway and Swale Estuaries and Marshes habitat network be avoided, mitigated or compensated for? 199

13.172 What evidence demonstrates that biodiversity impacts can be satisfactorily addressed?....199

13.173 How have contamination, land stability and former industrial land-use issues been assessed? 200

13.174 What flood risk evidence supports the allocation? 201

13.175 Have the sequential and exception tests been applied appropriately? 202

13.176 How will future flood risk and climate change impacts be managed throughout the lifetime of development? 204

13.177 What assessment has been undertaken regarding impacts on designated and non-designated heritage assets? 205

13.178 How will important landscape, townscape and waterfront characteristics be protected and enhanced?....205

13.179 What transport evidence supports the level of development proposed?..206

13.180 What highway, public transport, walking and cycling improvements are required?....207

13.181 Is there sufficient certainty that the necessary transport infrastructure can be delivered? 207

13.182 What utilities, wastewater, healthcare, education and community infrastructure improvements are required? 207

13.183 What role will the FPOA play in delivering employment growth? 208

13.184 How does Policy SA13 balance residential redevelopment, regeneration objectives and the protection of employment functions?....208

13.185 What evidence informs the proposed distribution between employment and other land uses? 208

13.186 What are the principal barriers to delivery and how will they be overcome? 209

13.187 Is Policy SA13 sufficiently flexible to respond to changing market circumstances over the Plan period? 209

Policy SA14: Employment Sites....210

13.188 What role do the allocated employment sites in Policy SA14 play in meeting future employment land requirements? 210

13.189 How do the allocations in Policy SA14 support the economic strategy and growth objectives of the Plan? 211

13.190 What evidence supports the quantity and distribution of employment land proposed? 212

13.191 What methodology was used to identify and assess the allocated employment sites in Policy SA14?....213

13.192 Were reasonable alternative sites considered and why were the selected sites preferred?....214

13.193 Are the allocation boundaries justified and clearly defined on the Policies Map?....215

13.194 What evidence demonstrates a need for the allocated employment land throughout the Plan period?....216

13.195 How does the allocation strategy respond to identified demand across different employment sectors?....217

13.196 Is there sufficient flexibility within Policy SA14 to accommodate changing economic circumstances and market requirements?....218

13.197 Given the significant over supply of employment land available within Medway, how has the Council considered unused or underused employment land not allocated for employment in the Plan for other uses, including housing, and why has it not taken that approach?....219

13.198 What transport and infrastructure improvements are required to support the allocated employment sites set out within Policy SA14?....220

13.199 Are the sites accessible by sustainable modes of transport?....222

13.200 Can utilities, digital infrastructure and servicing requirements be accommodated?....224

13.201 What assessment has been undertaken of environmental constraints affecting the employment allocations in Policy SA14?....225

13.202 How have impacts on designated ecological sites, protected habitats and biodiversity been assessed?....227

13.203 What mitigation measures are required and are they deliverable?....228

13.204 How have landscape, heritage and amenity impacts been addressed?....230

13.205 In relation to the larger strategic employment allocations, what evidence demonstrates that they are capable of delivery within the Plan period?....232

13.206 Are there any significant ownership, infrastructure, access or viability constraints relating to employment allocations within Policy SA14?....233

13.207 How will the delivery of strategic employment sites be monitored throughout the Plan period?....235

13.208 Does Policy SA14 provide a sufficiently clear framework for determining planning applications?....237

13.209 Is Policy SA14 justified, effective and consistent with national planning policy relating to economic growth and employment development? 238

General Questions for Policies SA13-SA14 242

13.210 Taken together, do Policies SA13 and SA14 provide a justified and effective means of achieving the Plan's spatial development strategy? 242

13.211 Have the cumulative effects of these allocations on transport infrastructure, ecological interests, water resources, wastewater treatment capacity, healthcare provision, education facilities and other critical infrastructure been adequately assessed? If so, how has this been demonstrated? 242

13.212 Is there sufficient certainty that the infrastructure and necessary mitigation measures to support these allocations will be delivered in a timely manner? 243

13.213 Are any main modifications required to ensure that Policies SA13 and SA14 are effective, justified and consistent with national policy? 243

Questions

General

13.1 What is the role of the Council in the delivery of the site allocations, over the Plan Period, in terms of what mechanisms, delivery vehicles and infrastructure provision arrangements it has, or will, put in place?

Council's response

13.1.1 The Council's role is to provide the planning framework necessary to facilitate delivery of the site allocations through the Local Plan, Infrastructure Delivery Plan (IDP), development management process and ongoing engagement with infrastructure providers and site promoters.

13.1.2 The Council will secure infrastructure and mitigation through planning conditions, planning obligations and other mechanisms available under planning legislation. Infrastructure delivery will be coordinated through the IDP, the Council's Strategic Infrastructure Group and ongoing engagement with infrastructure providers, whilst site-specific masterplans, delivery plans and phasing plans will be secured where required.

13.1.3 The Council will monitor delivery through the Authority Monitoring Report (AMR), periodic reviews of the IDP and ongoing collaboration with developers, infrastructure providers and other stakeholders throughout the Plan period.

13.2 Following on from discussions at the Phase 1 Hearings in particular in relation to flood risk, please provide updated 'Plan Period (Years)' in the site-specific information tables for each allocation.

Council's response

13.2.1 The Council has already taken account of flood risk considerations, infrastructure requirements and updated deliverability evidence through the latest housing trajectory appended to the Housing Delivery Topic Paper (ref: B22.5, Appendix, PDF pages 17-22).

13.2.2 Following submission of the Plan, the housing trajectory was updated to reflect the latest information from site promoters. Subject to the Inspectors accepting the Council's proposed stepped housing requirement and land supply position (refs: MLP/ED30 and MLP/ED30A), the Council would be able to update the "Plan Period (Years)" information within the site-specific information tables to ensure consistency with the latest housing trajectory.

13.3 Under the site-specific information tables for each site, how have the capacities been derived for the individual sites?

Council's response

13.3.1 Site capacities have been derived through a combination of site assessment work, engagement with site promoters and landowners, consideration of site constraints and opportunities, and the Council's wider evidence base.

13.3.2 The Council has considered factors including site area, environmental constraints, infrastructure requirements, urban design considerations, landscape capacity, density assumptions and anticipated development form when establishing site capacities. This work has been informed by information submitted through the Call for Sites process and subsequent engagement with site promoters.

13.3.3 The capacities contained within the latest housing trajectory therefore represent the Council's most realistic assessment of the amount of development that can be accommodated on each site whilst achieving the objectives of the Plan.

13.4 Under the site-specific information tables for each site, how has the plan period for delivery been decided for each site?

Council's response

13.4.1 The anticipated delivery periods have been informed by the Council's housing trajectory, which is based on site-specific assessments of suitability, availability and achievability. This includes engagement with site promoters, landowners, infrastructure providers and statutory consultees.

13.4.2 In establishing delivery assumptions, the Council has considered matters such as existing site uses, land ownership, planning status, infrastructure requirements, lead-in times, developer programmes, site constraints and anticipated build-out rates.

13.4.3 The resulting delivery periods represent the Council's best estimate of when sites are likely to come forward. They are not fixed predictions but provide a realistic basis for assessing housing delivery across the Plan period.

13.5 Under the site-specific information tables for each site, how have infrastructure and utilities requirements been considered in the plan period for delivery, including any related flexibility?

Council's response

13.5.1 Infrastructure and utilities requirements have been considered through the preparation of the IDP, engagement with infrastructure providers and the assessment of site-specific constraints and requirements.

13.5.2 The Council has shared housing trajectories, development assumptions and spatial information with infrastructure providers, utility companies and internal Council services to inform infrastructure planning and delivery programmes. Infrastructure requirements, lead-in times and delivery dependencies have been reflected in the housing trajectory and delivery assumptions where relevant.

13.5.3 The Council recognises that infrastructure planning is an iterative process and that infrastructure provider programmes, funding arrangements and delivery mechanisms continue to evolve. Accordingly, the IDP is a live document and flexibility is built into the Plan through ongoing monitoring, periodic review of the IDP, the development management process and site-specific masterplanning and phasing arrangements.

Policy SA1: Chatham Town Centre and Surrounds

13.6 Is Policy SA1 consistent with Policy S17: Chatham Town Centre?

Council's response

13.6.1 In its current form, there is no inconsistency with Policy S17. However, the Council recognises that clarification can be provided, as set out below with the minor modification.

Evidence base

a. N/A

Explanation

13.6.2 Policy SA1 covers a wider geographic area compared to that of policy S17. The former covers Chatham Town Centre and the surrounding area of Chatham. Therefore, the content of policy SA1 extends to sites beyond the scope of policy S17. Policy SA1 therefore requires a modification to clarify its scope and applicability.

Conclusion

13.6.3 The Council considers that Policy SA1 is justified by proportionate evidence, positively prepared and consistent with national policy. The effectiveness of the policy could be improved.

Proposed Main/Minor Modification

13.6.4 The Council proposes the following modification to criterion 1:

'In delivering on its residential potential, opportunity sites within Chatham Town Centre **and its surrounds** can also provide a mix of uses,….'

Reason for proposed Main/Minor Modification

13.6.5 To ensure the effectiveness of policy SA1.

13.7 Is there duplication between Policy SA1 and Policy S17, and does this impact on the effectiveness of the policy?

Council's response

13.7.1 Duplication across the two policies does exist, which could impact on effectiveness.

Evidence base

a. N/A

Explanation

13.7.2 Both policies refer to opportunity sites. The policy on opportunity sites would be better sited within policy SA1 only, alongside all the other identified sites and implementation requirements.

Conclusion

13.7.3 The Council considers that Policy SA1 is justified by proportionate evidence, positively prepared and consistent with national policy. The effectiveness of the policy could be improved via a modification.

Proposed Main/Minor Modification

13.7.4 Delete the last paragraph in Policy S17 that covers the opportunity sites:

'~~Proposals for opportunity sites will be guided by …… reinforce the 'core' along the I High Street.~~'

13.7.5 Within the table in policy SA1, amend entry CCB15 to include reference to opportunities to deliver complementary town centre uses. Medway Local Plan (ref: A1), page 252, row 6, column 3:

'Residential **and complementary main town centre uses.**'

13.7.6 Within the table in policy SA1, add entry for the Pentagon:

'**(insert site reference number), The Pentagon, enhancements and main town centre uses, 0, 1-5, 6-10, 11-15**'

Reason for proposed Main/Minor Modification

13.7.7 To ensure the effectiveness of policy SA1.

13.8 How has the circa 1,350 capacity for the strategic allocation been derived (criterion 3.)?

Council's response

13.8.1 The Housing Delivery Topic Paper Appendix (ref: B22.5) sets out the latest housing trajectory for the Medway Local Plan (ref: A1) across its plan period. The estimated capacity for each site listed within Policy SA1 (ref: A1, pages 252 &

253) is added together over the entire plan period using the Housing Delivery Topic Paper Appendix (ref: B22.5, pages 17 & 18) and concludes a total capacity of 1,322. The capacities for each of the sites were derived from a mixture of sources including the consideration of benchmarks from the 2024 Lichfields 'Start to Finish' (third edition) report, planning consents, brownfield register 2022, development briefs, Supplementary planning documents, Local Plan 2003.

13.8.2 Additionally, the Council recognises that some individual site capacities within the policy differ from the housing trajectory (ref: B22.5) and proposes to rectify these to ensure consistency with the Housing Delivery Topic Paper Appendix (ref: B22.5) through minor modifications.

Evidence base

a. B22.5, Housing Delivery Topic Paper Appendix, pages 17 & 18.
b. A1, Medway Local Plan, pages 251 to 253.

Explanation

13.8.3 The most up-to-date housing trajectory is set out in the Appendix to the Housing Delivery Topic Paper (ref: B22.5). The information of site capacity in B22.5 supersedes the capacity figures for sites CCB4, CCB20 and CCB31 as set out in Policy SA1 (ref: A1, pages 252 & 253).

13.8.4 The capacity source is identified at columns 13 (Build-out source) and 4 (Sources) of Housing Delivery Topic Paper Appendix (ref: B22.5, pages 17 & 18).

Conclusion

13.8.5 The Council considers that Policy SA1 is justified by proportionate evidence, positively prepared and consistent with national policy. The effectiveness of the policy could be improved.

Proposed Minor Modification

13.8.6 Amend the number of homes in criterion 3. Medway Local Plan (ref: A1), page 250, criterion 3:

'3. Collectively these identified small to medium sized sites will deliver circa ~~1,350~~ **1,322** new homes….'

13.8.7 Within the table in policy SA1, amend capacity for site CCB4. Medway Local Plan (ref: A1), page 252, row 2, column 4:

'Circa 50 61'

13.8.8 Within the table in policy SA1, amend capacity for site CCB20. Medway Local Plan (ref: A1), page 252, row 8, column 4:

'Circa 98 135'

13.8.9 Within the table in policy SA1, amend capacity for site CCB31. Medway Local Plan (ref: A1), page 253, row 2, column 4:

'Circa 179 40'

Reason for proposed Minor Modification

13.8.10 To ensure the effectiveness of policy SA1.

13.9 Why is housing mix and affordable housing a criterion (5.) specifically for this strategic allocation under Policy SA1?

Council's response

13.9.1 The Council does not consider that reference to these policies within criterion 5 is specifically necessary for policy SA1.

Evidence base

a. N/A

Explanation

13.9.2 It is recognised that all policies across the Local Plan will be read together. For purposes of effectiveness and avoiding duplication, the Council proposes a minor modification to delete this text set out in criterion 5.

Conclusion

13.9.3 The Council considers that Policy SA1 is justified by proportionate evidence, positively prepared and consistent with national policy. The effectiveness of the policy could be improved.

Proposed Minor Modification

13.9.4 Medway Local Plan (ref: A1), page 250, criterion 5:

'5. ~~Housing mix and Affordable Housing provision will be provided in accordance with policies T2 and T3 respectively.~~ As part of the wider housing strategy, the provision of supported housing, students, older persons and specialist needs will be supported where considered appropriate.'

Reason for proposed Minor Modification

13.9.5 To ensure the effectiveness of policy SA1.

13.10 Noting the reference to an Air Quality Management Area under Policy SA1, does air quality (criterion 9.) have the potential to impact on deliverability?

Council's response

13.10.1 No, deliverability would not be impacted upon. Medway Council is committed to addressing air quality within the identified Air Quality Management Areas (AQMAs) through its Air Quality Action Plan (2024-2029), which seeks to improve air quality in a number of ways including the monitoring of pollution levels. Monitoring of the AQMAs and the nitrogen dioxide levels is undertaken (since 2020) via automatic and non-automatic diffusion tubes. Ongoing improvements in the monitoring results in recent years show the concentration levels improving to such an extent that two AQMAs (Per Road and High Street Rainham) were revoked earlier this year. This could mean the revocation of the AQMA in Central Medway in the next few years if compliance is maintained.

13.10.2 Additionally, the design of a scheme can address air quality issues by following the Air Quality Planning Guidance (November 2021), when submitting a planning application. This provides a very flexible approach in ensuring air quality mitigation is achieved.

Evidence base

a. Air Quality Planning Guidance (November 2021), index, pdf pages 15, paragraph 5.5. page 17, paragraph 5.7 and table 5)
b. Air Quality Action Plan 2024-2029, Executive Summary and index, pages i to v

Explanation

13.10.3 Planning policies are complemented by other corporate strategies, initiatives and action plans in the environmental health team. Medway Council has prepared an Air Quality Action Plan (2024-2029) as part of its statutory duties required by the Local Air Quality Management Framework. It outlines the actions Medway will undertake between 2024 and 2029 to improve air quality within the identified Air Quality Management Areas (AQMAs), which includes the Central Medway AQMA relevant to this policy. Medway Council monitors the four Air Quality Management Areas and nitrogen dioxide levels using diffusion tubes across Medway, produces annual status reports on Kent Air[1], and is a member of the Kent and Medway Air Quality Partnership. Medway also has continuous automatic air quality stations in Chatham. This helps to feed into comments on planning applications, ensuring decisions and application of policy is effective.

13.10.4 The Air Quality Planning Guidance (November 2021) sets out a step-by-step process to determine the mitigation measures required for the appropriate

[1] https://www.kentair.org.uk/

scale of development proposed. In doing so, it also provides a flexible list of mitigation measures to choose from, allows for additional measures to be suggested by the developer and also provides a further option of making a financial contribution.

Conclusion

13.10.5 The Council considers that Policy SA1 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.10.6 N/A

Reason for proposed Main/Minor Modification

13.10.7 N/A

13.11 Why does Site FP25 provide an opportunity to reveal much about the history of Chatham (criterion 10.b) and why is a masterplan required for this site (criterion 13.)?

Council's response

13.11.1 This site provides the opportunity to reveal Chatham's history due to its location and its proximity to listed buildings.

Evidence base

a. N/A

Explanation

13.11.2 This is an historically important point of arrival to Chatham, with the Chatham train station being a heritage asset2 sited adjacent to 18th century military officers' terraced houses.

13.11.3 The site is also elevated above the 'bowl' of Chatham and so development could impact on views from lower vantage points and from other heritage assets such as the 18th century defensive lines for the dockyard, and Fort Amherst.

13.11.4 The NPPF (2024, paragraphs 203 and 219) requires Local Authorities to look for opportunities for enhancement of heritage, and so new development should seek to do in this sensitive location through design and potential opportunities for interpretation.

[2] Kent Historic Environment Record and National Heritage List for England maintained by Historic England.

Conclusion

13.11.5 The Council considers that Policy SA1 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.11.6 N/A

Reason for proposed Main/Minor Modification

13.11.7 N/A

13.12 Is the provision of green-blue infrastructure and suitable walking and cycling links a specific issue for this site allocation (criterion 11.) and what would be required?

Council's response

13.12.1 The provision and accessibility of open space within Chatham Town Centre is limited in supporting young families that may want to visit a park or play area as part of their shopping trip. The Great Lines is adjacent to the centre, to the east, but topography makes gaining access difficult. Adjacent to this is the Town Hall Gardens, which is located along Rope Walk, which is less frequented and further away from the activity of the High Street. Jacksons Field, to the west of the centre, is a destination in its own right. The Riverside Gardens and the Paddock along the waterfront are spaces that are frequented regularly and have both recently been regenerated. Further opportunities to provide and improve access to open space with the planned increase in housing provision will support town centre living. The wider benefits of connecting to the other centres will also support sustainable movement, support health objectives and address climate change ambitions.

13.12.2 The provision of green-blue infrastructure and walking and cycling links is an ambition that originates from the Green and Blue Infrastructure Strategy (ref: MLP/ED37), which is set out in policy S5: Securing Strong Green and Blue Infrastructure. This accords with Natural England's Green Infrastructure Framework, which sets out principles and standards to strengthen natural networks.

13.12.3 Chatham is identified within the wider urban Medway area (ref: MLP/ED37, pages 54 – 56, paragraphs 5.2.1 - 5.2.7 including 'Key Opportunities). The critical role its green and blue infrastructure plays in improving health, supporting regeneration, adapting to climate change and enhancing quality of life is recognised.

13.12.4 Chatham's existing infrastructure can be enhanced through the redevelopment of key sites in policy SA1 alongside other complementary

initiatives to improve the public realm and create a network of walking and cycling links.

13.12.5 Site proposals would be required to follow guidance set out in the Chatham Design Code, The Chatham masterplan, Arches Chatham Neighbourhood Plan and the Green and Blue Infrastructure Strategy to bring these ambitions to fruition. The opportunity of regenerating Chatham can contribute to wider and multiple strategic objectives.

Evidence base

a. MLP/ED37 Green and Blue Infrastructure Strategy, pdf pages 54 – 56.

Explanation

13.12.6 Pages 54 to 56 of the Green and Blue Infrastructure Strategy (ref: MLP/ED37) sets out the existing green and blue infrastructure and the potential benefits for establishing a network that will deliver multiple benefits for residents and address wider key ambitions of the Medway Local Plan for regeneration, climate resilience and placemaking.

13.12.7 Medway has the opportunity to invest in green and blue infrastructure through the delivery of sites in its centres, including sites within policy SA1. Various guidance documents (Chatham Design Code, town centre masterplans, Arches Chatham Neighbourhood Plan) seek improvements to public realm, active travel networks, riverside access, urban greening, sustainable drainage and biodiversity enhancement (ref: MLP/ED37, page 55, para 5.2.6). Together with the Green and Blue Infrastructure Strategy, key opportunities exist to create a continuous and accessible river corridor, integrate green infrastructure into regeneration, improve air quality through urban greening, deliver multifunctional sustainable urban drainage systems (SuDS) and more (ref: MLP/ED37, page 56, para 5.2.7 and Key Opportunities).

Conclusion

13.12.8 The Council considers that Policy SA1 is justified by proportionate evidence, effective, positively prepared and consistent with national policy. The inclusion of criterion 11 is a policy choice for the Council. It is based on proportionate evidence. No soundness issue arises.

Proposed Main/Minor Modification

13.12.9 N/A

Reason for proposed Main/Minor Modification

13.12.10 N/A

13.13 Is criterion 12. of Policy SA1 formatted and worded in the way which is intended?

Council's response

13.13.1 No, 'views analysis' should read as bullet a. and' landscape and townscape assessments' as bullet b.

Evidence base

a. N/A

Explanation

13.13.2 This requires a minor formatting amendment.

Conclusion

13.13.3 The Council considers that Policy SA1 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Minor Modification

13.13.4 Medway Local Plan (ref: A1), page 251, criterion 12:

'12. Demonstrate consideration…….with a planning application, a:

a. Views analysis

b. Landscape and townscape assessments that ~~has~~ **have** been used to inform the design of the scheme.'

Reason for proposed Main/Minor Modification

13.13.5 To ensure clarity of requirements and effectiveness of the policy.

13.14 Why is a heritage, townscape and visual impact assessment required for sites CCB49 and GS2 (criterion 14.), but not for sites FP10 and FP25 (criterion 10.)?

Council's response

13.14.1 The Council recognises the sensitivities of the locations surrounding these sites and would propose a modification to include a heritage, townscape and visual impact assessment for sites CCB49, GS2, FP10 and FP25.

Evidence base

a. N/A

Explanation

13.14.2 To ensure consistency with similar sites in prominent locations within historic areas and in proximity to several heritage assets, the Council proposes a modification to the policy wording.

Conclusion

13.14.3 The Council considers that Policy SA1 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.14.4 Amend text at criterion 14:

'14. Sites CCB49**,** ~~and~~ GS2**, FP10 and FP25** must provide a Heritage….'

Reason for proposed Main/Minor Modification

13.14.5 To ensure consistency and effectiveness of policy SA1 and associated heritage policies.

13.15 Where 'flood risk assessment' is identified under Policy SA1 (criterion 15.) what does this mean as regards a design principle (the sub-heading)?

Council's response

13.15.1 This should read as a requirement as part of a planning application. The Council suggests a minor modification to clarify the wording.

Evidence base

a. N/A

Explanation

13.15.2 A modification is required to make the policy more effective and clear regarding developer requirements.

Conclusion

13.15.3 The Council considers that Policy SA1 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.15.4 Amend wording at criterion 15:

'**Submit a** Flood Risk Assessment **as part of a planning application.**'

Reason for proposed Main/Minor Modification

13.15.5 To provide clarity and improve effectiveness of the policy.

13.16 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/3b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA1, as set out in its Phase 1 Hearing Statement.

Council's response

13.16.1 The Sequential Test Report (ref: B6.5) lists six sites within flood zone 3 or partly within Flood Zone 3 (within multiple flood zones). The detailed assessment within the Level 2 Strategic Flood Risk Assessment (ref: B6.3) identifies three sites predominantly in Flood Zone 3 (above 97%), whilst the other three sites are either 57%, 4% or 2% in Flood Zone 3. None of the sites are located within Flood Zone 3b.

13.16.2 Of the six identified sites in Flood Zone 3, three have implemented planning consents (one located predominantly in Flood Zone 3) with no residential or vulnerable uses on the ground floor. The other three sites either front onto the high street, requiring a use with an active frontage (less vulnerable) on the ground floor and/or would require a flood risk assessment to be submitted alongside any planning application to be considered by the Environment Agency. On this basis adequate mitigation can be agreed with the Environment Agency and deliverability would therefore not be impacted upon as demonstrated by the consented schemes.

13.16.3 The Environment Agency's Matter 6 statement (ref: E68), requires a policy wording change to ensure that proposals within areas at flood risk be guided by the development of strategic flood management infrastructure to protect allocated development sites and the existing Chatham community from tidal flood risk. The remaining sites without planning consent within policy SA1 already have built form in existence and redevelopment or conversion will not have vulnerable uses on the ground floor. The approach set out at paragraph 13.16.2 is considered appropriate, which could trigger adequate mitigation measures without requiring strategic infrastructure. A proportionate contribution toward Medway Estuary and Swale Strategy (MEAS) can be considered, where a threshold of impact reflects the requirement for such mitigation.

Evidence base

a. B6.5 Strategic Flood Risk Assessment – Sequential Test Report, pdf page Insert examination document reference, title, PDF page number 27, Table of sites located within High Risk Areas.
b. B6.3 Strategic Flood Risk Assessment – Level 2 (November 2025), pdf pages 67, 76, 56, 57, 46, 59.

Explanation

13.16.4 The table below provides, in combination with the Council's response above, a detailed explanation regarding the six sites within policy SA1 identified within Flood Zone 3. The 'comments' and 'approach' columns respond to the Environment Agency comments alongside paragraphs 13.16.2 and 13.16.3.

Site ref	Flood Zone %*			Consented	Comments	Approach
	1	2	3**			
CCB7		43	57		Fronts onto high street. Active (less vulnerable) use required on ground floor. Consider proportionate contribution where appropriate.	Require FRA to ensure adequate mitigation.
CCB8			*100*	*Yes - conversion*		*Being delivered*
CCB21		*98*	*2*	*Yes*	*Residential above ground floor. Ground floor remains commercial.*	*Being delivered*
CCB24			97		Fronts onto high street. Active (less vulnerable) use required on ground floor. Previous application retained commercial GF and sought change of use to residential above. Consider proportionate contribution where appropriate.	Require FRA to ensure adequate mitigation.
CCB27		0.4	99.6		Within the town centre. Could require a less vulnerable use on the ground floor. Consider proportionate contribution where appropriate.	Require FRA to ensure adequate mitigation.
CCB31	*82*	*13.7*	*4*	*Yes*	*Conditioned for disposal of surface water and verification of sustainable urban drainage.*	*Being delivered*

**Sourced from B6.3: Strategic Flood Risk Assessment – Level 2 (November 2025)*

***note this category includes flood zones 3a and 3b*

Conclusion

13.16.5 The Council considers that Policy SA1 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.16.6 N/A

Reason for proposed Main/Minor Modification

13.16.7 N/A

13.17 Under the 'Site-specific Information table', will any of the sites involve the relocation of the existing uses, and will this have a bearing on deliverability?

Council's response

13.17.1 Many of the sites in policy SA1 were vacant or in residential use. The larger sites including CCB8, CCB15, CCB20, CCB37 and FP10 have already been implemented and demolition or conversion is underway. The telephone exchange (Site CCB49) landowner confirmed that any redevelopment will not result in a loss of active or existing employment floorspace.

Evidence base

a. N/A

Explanation

13.17.2 Sites CCB8 (Mountbatten House) and CCB15 (Former Debenhams) are undergoing conversion. The buildings were empty for a few years prior to being given consent. Sites CCB20 (Former Trafalgar Centre) and CCB37 (Former Go Outdoors) were vacant for a few years before demolition began. The new St John Fisher School was built and remains open prior to site FP10 (Former St John Fisher School) being taken forward.

13.17.3 The telephone exchange (Site CCB49) was supported with a representation by the landowner to the Regulation 18 consultation undertaken in 2024. This confirmed the availability of the site by 2031 or earlier due to the consolidation of BT's Exchange portfolio and office-based staff being located in a separate fit-for-purpose office buildings. The site has been underutilised and mostly empty for a significant amount of time. It was confirmed through this representation that any redevelopment will not result in a loss of active or existing employment floorspace.

Conclusion

13.17.4 The Council considers that policy SA1 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.17.5 N/A

Reason for proposed Main/Minor Modification

13.17.6 N/A

Policy SA2: Heritage-led Sites

13.18 How have these 2 strategic heritage-led sites been derived, and their overall capacities decided on?

Council's response

13.18.1 Sites CCB25 and CCB35 were identified in the Development brief: Interface Land, Chatham (June 2018). This Supplementary Planning document (SPD) was adopted in 2018 following public consultation in December 2017. The two sites, Brunel (CCB35) and Riverside (CCB25) were the subject of this SPD and include in-depth analysis, which articulated the potential of mixed-use schemes for both sites. The exact mix of uses and quantum of development is not specified to enable a flexible approach for delivery.

13.18.2 The Star Hill to Sun Pier heritage-led sites (FP1, FP11, FP12, FP14, FP16, RWB19) are either covered by the Star Hill to Sun Pier Supplementary Planning Document designated area or are in close proximity to it. The capacities for each of the sites were derived from a mixture of sources including the consideration of benchmarks from the 2024 Lichfields 'Start to Finish' (third edition) report, planning consents, brownfield register 2022, development briefs, Supplementary planning documents, Local Plan 2003.

13.18.3 Additionally, the Council recognises the individual site capacity from the policy differs to the housing trajectory (ref: B22.5) for site RWB19 and proposes to rectify these through minor modifications.

Evidence base

a. B22.5, Housing Delivery Topic Paper Appendix, page 18.
b. A1, Medway Local Plan, pages 256.
c. Development brief: Interface Land, Chatham (June 2018), page 13, paragraph 2.2

Explanation

13.18.4 The table below provides more detail regarding the source of site capacity information.

Site ref	Description	Number of homes	Capacity source
CCB25	Mixed use	0	Interface Land SPD
CCB35	Mixed use	0	Interface Land SPD
FP1	Residential	28	Planning consent
FP11	Residential	123	Lichfields benchmark
FP12	Residential	70	Lichfields benchmark
FP14	Residential	7	Annual Monitoring Report – buildout
FP16	Residential	6	Annual Monitoring Report – buildout
RWB19	Residential	296	Annual Monitoring Report – buildout

13.18.5 A conservative approach has been taken for sites CCB25 and CCB35. The Development brief: Interface Land identifies the mix of use including residential as the dominant land use (page 13, paragraph 2.2). There is therefore an opportunity for residential to come forward in the future. This will add to the future housing numbers.

13.18.6 The Council proposes modifications to the policy to specify the mixed use rather than residential development for site CCB25, which is also supported by the Regulation 19 representations from Chatham Historic Dockyard Trust. The representation requested modifications that would provide consistency across the policy alongside the change to site CCB25 to mixed use, which requires amendments to criterion 2b and 2e.

13.18.7 The Council proposes an additional minor modification to amend the capacity for site RWB19 and the total capacity at criterion 3b. The most up-to-date housing trajectory is set out in the Appendix to the Housing Delivery Topic Paper (ref: B22.5, page 18), which supersedes the capacity figure for site RWB19 as set out in Policy SA2 (ref: A1, pages 256).

Conclusion

13.18.8 The Council considers that Policy SA2 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.18.9 Remove the residential quantum identified at criterion 2b. (ref: A1, page 254):

'2b. Combined site capacity: ~~Circa 150 new homes as part of~~ a mixed use development.'

13.18.10 Delete text at criterion 2e (ref: A1, page 254) to address Regulation 19 comments received from Chatham Historic Dockyard Trust:

'2e. Development should seek to reinforce.....northern end of the Dockyard, ~~currently the focus of timber management associated with the construction of ships~~.'

13.18.11 Amend entry for site CCB25 within the Site-specific information table (ref: A1, page 255, row 1):

'CCB25, Riverside (Interface Land), ~~Residential~~ **Mixed-use**, circa ~~150~~ **0**, plan period 6-10'

13.18.12 Amend total capacity at criterion 3b (ref: A1, page 254):

'3b. Combined site capacity: circa ~~474~~ **530** new homes.'

13.18.13 Amend capacity of site RWB19 within the Site-specific information table (ref: A1, page 256, row 2):

'RWB19, Bardell Terrace Rochester, Residential, circa ~~246~~ **296**, 1-5'

Reason for proposed Main/Minor Modification

13.18.14 To provide clarity and improve the effectiveness of the policy.

13.19 Policy SA2 includes a number of supporting documents, including the Interface Land Supplementary Planning Document, the Star Hill to Sun Pier Development Framework and a Conservation Area Appraisal. Is it intended these documents would be elevated in status to become part of the development plan by virtue of their inclusion within the policy?

Council's response

13.19.1 No, the documents would not be elevated to development plan status. As SPDs the documents set out environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land on the allocated sites.

Evidence base

a. N/A

Explanation

13.19.2 The Council proposes a modification to the policy wording at criterion 2c, 3c, 6 and 8 and insertion of new supporting text to form a new paragraph 14.3.4.

Conclusion

13.19.3 The Council considers that Policy SA2 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.19.4 Delete text from criterion 2c (ref: A1, page 254):

'2c. Both sites are within.....locational context**.** ~~and be compliant with the Interface Land Supplementary Planning document (SPD)~~.

13.19.5 Delete text from criterion 3c (ref: A1, page 254):

'Development will need to be compliant with the ~~Star Hill to Sun Pier Development Framework,~~ relevant Conservation Area Appraisal...'

13.19.6 Amend criterion 6 and 8 (ref: A1, page 255), beneath subheading 'Subsequent design principles':

'6. ~~Compliance with~~ **Be informed by the** Interface Land SPD

8. ~~Compliance with~~ **Be informed by the** Star Hill to Sun Pier Development Framework.'

13.19.7 Insert new text to form paragraph 14.3.4 (ref: A1, page 254):

'**14.3.4 Development proposals must have regard to any environmental, social, design and economic objectives including locational specific guidance within the Development Brief: Interface Land and Star Hill to Sun Pier Development Framework Supplementary Planning Documents.**'

Reason for proposed Main/Minor Modification

13.19.8 To provide clarity of requirements and improve effectiveness of the policy.

13.20 Under the 'Site-specific Information table', what mixed-use would site ref: CCB35 be put to?

Council's response

13.20.1 Whilst the Interface Land SPD advises on uses including residential, leisure, food and beverage, commercial, further and higher education, open space, riverside activities, recreation and sustainable connections, it recognises the rich heritage in this location requires the consideration of appropriate uses that would be complementary. The guidance therefore also allows for other uses to be considered (Development brief: Interface Land, Chatham, page 13).

13.20.2 Additionally, it is noted that Regulation 19 representations from the Chatham Historic Dockyard Trust requested that site CCB25 be changed to mixed use to ensure consistency with the Development Brief guidance and allow for the flexibility to respond to the market. The proposed modifications are articulated above at 13.18.

Evidence base

a. Development brief: Interface Land, Chatham, page 13

Explanation

13.20.3 Sites CCB25 and CCB35 were identified in the Interface Land Development brief (June 2018). The two sites, Brunel (CCB35) and Riverside (CCB25) were the subject of this SPD and include in-depth analysis, which articulated the potential of mixed-use schemes for both sites. The exact mix of uses and quantum of development is not specified to enable a flexible approach for delivery. However, a description of the mixed use sought, consistent with the Development Brief: Interface Land, would provide clarity within policy SA2. The Council therefore proposes a modification within the policy to provide clarification.

Conclusion

13.20.4 The Council considers that Policy SA2 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.20.5 Modifications set out at 13.18 will be amended to provide clarity of the mixed use sought. Amend entry for site CCB25 within the Site-specific information table (ref: A1, page 255, row 1):

'CCB25, Riverside (Interface Land), ~~Residential~~ **Mixed-use complementary to its rich heritage (residential, commercial, leisure, further and higher education, open space, recreational and/or other)** circa ~~150~~ **0**, 6-10'

Reason for proposed Main/Minor Modification

13.20.6 N/A

13.21 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/3b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA2, as set out in its Phase 1 Hearing Statement.

Council's response

13.21.1 The Sequential Test Report (ref: B6.5) lists four sites within flood zone 3 or partly within Flood Zone 3 (within multiple flood zones). The detailed assessment within the Level 2 Strategic Flood Risk Assessment (ref: B6.3) identifies two sites predominantly in Flood Zone 3/3b, whilst the other two sites are located mostly in Flood Zone 1.

13.21.2 Given the limited site coverage within Flood zone 3b, the schemes could ensure that flood zone 3b is designed around (including taking into account the Environment Agency's comments/advice), recommended actions and mitigations set out in the Strategic Flood Risk Assessment – Level 2 (November 2025) (ref: B6.3) are followed and/or the exceptions test is satisfied. On this basis adequate mitigation can be agreed with the Environment Agency and deliverability would therefore not be impacted upon.

13.21.3 The Environment Agency's Matter 6 hearing statement (ref: E.68) comments point to design considerations and requires development to be steered toward lower flood risk areas, which would be taken into account as above and in the table below.

Evidence base

a. B6.5 Strategic Flood Risk Assessment – Sequential Test Report, pdf page Insert examination document reference, title, PDF page number 27, Table of sites located within High Risk Areas.
b. B6.3 Strategic Flood Risk Assessment – Level 2 (November 2025), pdf pages 71, 86, 42, 68.

Explanation

13.21.4 The table below provides, in combination with the Council's response above, a detailed explanation regarding the six sites within policy SA1 identified within Flood Zone 3.

Site ref	Flood Zone %*				Consented	Comments	Approach
	1	2	3**	3b			
CCB25		1.9	98.1	approx. 8.1		Detailed actions and mitigations set out in B6.3. Design to avoid vulnerable uses in FZ3b and/or steer to lower flood risk areas.	Exceptions Test required. Required actions/ mitigations
CCB35	61.5	10.3	28.2			Detailed actions and mitigations set out in B6.3. Design to avoid vulnerable uses in FZ3b and/or steer to lower flood risk areas.	Require FRA to ensure adequate mitigation.
FP11	52.5	6.4	41.1	approx. 23.1		Detailed actions and mitigations set out in B6.3. Design to avoid vulnerable uses in FZ3b and/or steer to lower flood risk areas.	Exceptions Test required. Require FRA to ensure adequate mitigation.
FP14	96.8		3.2		Yes		

**Sourced from B6.3: Strategic Flood Risk Assessment – Level 2 (November 2025)*

***note this category includes flood zones 3a and 3b*

13.22 Under the 'Site-specific Information table', will any of the sites require upfront archaeological work and, if so, will this have a bearing on deliverability and a need for flexibility?

Council's response

13.22.1 Sites CCB25 and CCB35 will require upfront archaeological work. The Development Brief: Interface Land, Chatham provides a robust assessment of the historic environment from pages 17 to 27. In doing so, it sets out the parameters and issues for consideration on each site, identifies the relevant documents that will need to be considered in supporting a planning application and sets out what would be required for planning applications.

13.22.2 Archaeology forms part of this historic environment and it is noted that most archaeological remains are not designated. The guidance provides a flexible approach in response to archaeological assets. It elaborates on the need for the preservation of in situ archaeological assets. Where this cannot be avoided, safeguarding measures can be agreed. It is also stated that excavation of archaeological assets should be a last resort only to be considered if it can be demonstrated that harm has been minimised and that which remains is unavoidable and clearly and convincingly outweighed by the public benefits of permitting the harm to be incurred. The standard process of requiring archaeological investigations, excavations, monitoring and recording prior to or during construction is expected dependent on the proposals and appropriate mitigation measures.

13.22.3 An appropriate mix of uses that complements and enhances the historic environment is key to ensuring deliverability where housing alone may have encountered difficulties over the years. This emphasises the relevance and regard required to the principles within the development brief. The policy wording therefore clarifies mixed-use for both sites, and the development brief provides the opportunity for exploration of a mix of uses.

Evidence base

a. The Development Brief: Interface Land, Chatham

Explanation

13.22.4 N/A

Conclusion

13.22.5 The Council considers that Policy SA2 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.22.6 N/A

Reason for proposed Main/Minor Modification

13.22.7 N/A

13.23 Please clarify if a main modification is in fact proposed to this policy to address potential impacts on the North Downs Woodland Special Area of Conservation (SAC) south of Lidsing, as referred to in the Council's Response to the Inspectors' Initial Queries (MLP/ED6) (page 3, under 6.) and its Phase 1 Hearing Statement on Matter 6 Natural Environment (6.12.3)?

Council's response

13.23.1 The Council can confirm that the main modification is not relevant to this policy. Reference to policy SA2 in MLP/ED6 (page 3) is a typo and should read as policy S2 instead.

Evidence base

a. MLP/ED6, page 3

Explanation

13.23.2 N/A

Conclusion

13.23.3 The Council considers that Policy SA2 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.23.4 N/A

Reason for proposed Main/Minor Modification

13.23.5 N/A

13.24 How was the effect of the Interface land allocations considered on the operational activities of the Chatham Dockyard, including its basins?

Council's response

13.24.1 The Development Brief: Interface Land, Chatham is a collaboration between Medway Council, Homes England, Chatham Historic Dockyard Trust and Historic England. The Historic Dockyard operational activities and mast pond area were factored into the preparation of the development brief and points to the consideration of context for development proposals. The requirements for ensuring proposals are appropriate and blending in with existing operations is weaved in throughout the development brief.

13.24.2 The basins are located a distance to the northeast of the Interface Land and are separated by the leisure and retail destination at Dockside (see image below). Development proposals on the Interface Land would therefore have no impact on the operation of the basins.



Evidence base

a. The Development Brief: Interface Land, Chatham, pages 13 and 15, sections 2.2 and 2.4 respectively.

Explanation

13.24.3 For example, in considering the land use potential (ref: Development brief: Interface Land, page 13, section 2.2) the adjacency to the historic Dockyards operations is noted and requires due consideration of appropriate uses that would be complementary. Opportunities are also identified to link all sites to the Historic Dockyard via the regenerated mast pond area.

13.24.4 Section 2.4 (page 15) comments on the need for proposals to recognise the integrity of the adjacent Historic Dockyard is the overriding determinant of any satisfactory development proposals. Applicants are also required to ensure discussions are had with Historic England and Historic Dockyard trust in agreeing on mitigations and avoiding harm to the historic environment.

Conclusion

13.24.5 The Council considers that Policy SA2 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.24.6 N/A

Reason for proposed Main/Minor Modification

13.24.7 N/A

Policy SA3: Gillingham District Centre

13.25 Is Policy SA3 consistent with Policy S19: Gillingham District Centre?

Council's response

13.25.1 Yes, Policy SA3 is consistent with Policy S19. Policy SA3 elaborates on how the ambitions set out in Policy S19 can be achieved by supporting sustainable growth objectives through the delivery of housing, catering for students and exploring opportunities to connect to the waterfront.

13.25.2 Greater clarity can be provided by modifications to Policy S19 to include the provision of housing and student needs. Greater clarity can be provided within policy SA3 to celebrate the military heritage.

Evidence base

a. N/A

Explanation

13.25.3 Policy S19 does describe opportunities for diversification and regeneration but does not list the provision of housing or supporting students. Policy SA3 does not mention the military heritage, which is very relevant to Gillingham District Centre.

Conclusion

13.25.4 The Council considers that Policy SA3 and S19 are justified by proportionate evidence, effective, positively prepared and consistent with national policy. Further clarity can be provided by the modifications proposed below.

Proposed Main/Minor Modification

13.25.5 Amend paragraph 1 of Policy S19 (ref: A1, page 143):

'Gillingham District Centre performs a local function, catering for the needs of residents **and students** within its catchment.'

13.25.6 Include further bullet within list at paragraph 2 of Policy S19 (ref: A1, page 143) as the new first bullet:

'Opportunities for diversification and regeneration to enhance the offer… will be supported. This can include:

a. The provision of new homes and student accommodation,'

13.25.7 Add new criterion 7 of Policy SA3 (ref: A1, page256):

'**7. Will demonstrate the consideration of opportunities for enhancing Gillingham's military heritage through regeneration, delivery of infill or mixed-use scheme, public realm improvements or any other enhancement projects.**'

Reason for proposed Main/Minor Modification

13.25.8 To provide clarity of requirements when read across both policies.

13.26 Is there duplication between Policy SA3 and Policy S19 and does this impact on the effectiveness of the policy?

Council's response

13.26.1 There is duplication regarding the Greenway link. This can be clarified with a modification to Policy S19.

Evidence base

a. N/A

Explanation

13.26.2 N/A

Conclusion

13.26.3 The Council considers that Policy SA3 and S19 are justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.26.4 Amend Policy S19, second paragraph, 6th bullet (ref: A1, page 143):

'Enhancing access to the waterfront and supporting health and wellbeing **objectives.** ~~by using the former dock rail line and adjacent green spaces to create a green pedestrian and cycle route.~~'

13.26.5 Amend Policy SA3 at criterion 9 (ref: A1, page 256):

'Opportunities must be sought to connect walking and ~~cycle~~ **cycling** routes to ~~connect to~~ destinations including universities and with the proposed Gillingham Greenway as a rich green resource for residents **and students** to improve health**, accessibility** and connectivity to the waterfront and **wider Medway through** the riverside walk.'

Reason for proposed Main/Minor Modification

13.26.6 To provide clarity of requirements when read across both policies.

13.27 How has the circa 100 new homes capacity for this strategic allocation been derived (criterion 3.)?

Council's response

13.27.1 The Housing Delivery Topic Paper Appendix (ref: B22.5) sets out the latest housing trajectory for the Medway Local Plan (ref: A1) across its plan period. The estimated capacity for each site listed within Policy SA3 (ref: A1) is added together over the entire plan period using the Housing Delivery Topic Paper Appendix (ref: B22.5, page 17) and concludes a total capacity of 115. This differs from the total reflected at criterion 3 of policy SA3. The Council would propose a minor modification to correct this total.

Evidence base

a. Housing Delivery Topic Paper Appendix (ref: B22.5), pages 17.
b. Medway Local Plan (ref: A1), page 256.

Explanation

13.27.2 The most up-to-date housing trajectory is set out in the Appendix to the Housing Delivery Topic Paper (ref: B22.5), which confirms the figures in policy SA3 site-specific information table.

Conclusion

13.27.3 The Council considers that Policy SA1 is justified by proportionate evidence, positively prepared and consistent with national policy. The effectiveness of the policy could be improved.

Proposed Main/Minor Modification

13.27.4 Amend the number of homes in criterion 3. Medway Local Plan (ref: A1), page 256, criterion 3:

'3. Will deliver circa ~~100~~ **115** new homes within the first…'

Reason for proposed Main/Minor Modification

13.27.5 To ensure the effectiveness of policy SA3.

13.28 Where Policy SA3 states 'demonstrate compliance with relevant guidance' (criterion 10.) as the sole design principle, is this an effective way to plan for these sites in terms of what might be required?

Council's response

13.28.1 The Council accepts that further criteria could improve the effectiveness of the policy. Proposed modifications are listed below.

Evidence base

a. N/A

Explanation

13.28.2 To improve the effectiveness of the policy, modifications are proposed to include further design principles beneath subheading 'Subsequent design principles'.

Conclusion

13.28.3 The Council considers that Policy SA3 is justified by proportionate evidence, effective, positively prepared and consistent with national policy. Clarity of design principles can improve the effectiveness of the policy.

Proposed Main/Minor Modification

13.28.4 Include further design principles beneath subheading 'Subsequent design principles' (ref: A1, page 257):

'**11. Demonstrate how Gillingham's military heritage can be enhanced**

12. Illustrate how pedestrian and cycle routes will be enhanced as safe travel routes connecting to the proposed Greenway, open spaces, universities and other key destinations. In doing so, provide an accessibility study to support a planning application.

13. If fronting onto the high street, proposals must demonstrate how residents and students can benefit and be supported.'

Reason for proposed Main/Minor Modification

13.28.5 To provide clarity of the requirements and improve the effectiveness of the policy.

13.29 How does the policy address potential impacts on the North Downs Woodland SAC south of Lidsing, as referred to in the Council's Response to the Inspectors' Initial Queries (MLP/ED6) (page 3, under 6.) which refers to this site?

Council's response

13.29.1 The Council can confirm that the main modification is not relevant to this policy. Reference to policy SA2 in MLP/ED6 (page 3) is a typo and should read as policy S2 instead.

Evidence base

a. N/A

Explanation

13.29.2 N/A

Conclusion

13.29.3 The Council considers that Policy SA3 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.29.4 N/A

Reason for proposed Main/Minor Modification

13.29.5 N/A

Policy SA4: River Waterfront

13.30 Is the riverside walk that Policy SA4 envisages will be provided (criterion 1.) shown on Figure 11: River Waterfront Concept Plan?

Council's response

13.30.1 No. Figure 11 does not currently show the indicative alignment of the riverside walk referred to in criterion 1 of Policy SA4. The Council proposes a Main Modification to Figure 11 to identify an indicative riverside walk corridor.

Evidence base

- N/A

Explanation

13.30.2 Criterion 1 of Policy SA4 requires the provision of a riverside walk as part of the comprehensive redevelopment of the River Waterfront allocation. However, whilst Figure 11 identifies a range of development components and town connections, it does not currently illustrate the indicative alignment of the riverside walk.

13.30.3 The Council acknowledges that this reduces the effectiveness of the concept plan as a visual guide to the intended form of development and may create uncertainty regarding the relationship between the waterfront, public realm and movement network. The omission does not affect the overall development strategy for the allocation, but clearer identification of the riverside walk would assist applicants, decision-makers and stakeholders in understanding the Council's expectations for the site.

13.30.4 The Council considers that the riverside walk is an important component of the allocation, contributing to improved accessibility, connectivity, public access to the waterfront and placemaking objectives. The route should therefore be illustrated on the concept plan in a manner that allows flexibility during the detailed design stage whilst clearly indicating the Council's intended outcome.

Conclusion

13.30.5 The Council considers that Policy SA4 remains justified and consistent with national policy. However, Figure 11 does not currently illustrate an important element of the allocation requirements. A modification to Figure 11 would improve the effectiveness of the policy by providing greater clarity and certainty regarding the expected provision of the riverside walk.

Proposed Main/Minor Modification

13.30.6 Amend Figure 11: River Waterfront Concept Plan to show an indicative riverside walk corridor along the waterfront edge of the allocation.

Reason for proposed Main/Minor Modification

13.30.7 The modification is necessary to improve the effectiveness of Policy SA4 by ensuring that Figure 11 accurately reflects the requirements of criterion 1 and provides a clear visual indication of the proposed riverside walk. The modification would improve clarity for applicants and decision-makers without altering the overall development strategy for the allocation.

13.31 How has the circa 4,197 capacity for this strategic allocation been derived (criterion 2.)?

Council's response

13.31.1 The Council acknowledges that the figure of circa 4,197 dwellings in criterion 2 of Policy SA4 is no longer consistent with either the site-specific information contained within the submitted policy or the latest housing trajectory. Based on the latest housing trajectory, the estimated capacity of the allocation is approximately 3,886 dwellings.

Evidence base

- N/A

Explanation

13.31.2 The capacity identified within Policy SA4 has evolved through the plan-making process as further evidence has become available regarding site constraints, deliverability, infrastructure requirements and development assumptions. Whilst criterion 2 refers to circa 4,197 dwellings, the site-specific information accompanying the policy identifies a lower capacity, and the latest housing trajectory now identifies an estimated capacity of approximately 3,886 dwellings.

13.31.3 The housing trajectory is based on a comprehensive site-by-site assessment of deliverability, informed by engagement with site promoters, infrastructure providers and statutory consultees. The latest trajectory provides the most reliable and up-to-date assessment of the likely capacity and delivery assumptions for the allocations.

Conclusion

13.31.4 The Council considers that the allocation remains justified and effective. However, there is an inconsistency between criterion 2, the site-specific information and the latest housing trajectory. A modification is therefore required to ensure that the policy is internally consistent and reflects the most up-to-date evidence on capacity and deliverability.

Proposed Main/Minor Modification

13.31.5 Amend criterion 2 of Policy SA4 by replacing "circa 4,197 dwellings" with "circa 3,886 dwellings".

Reason for proposed Main/Minor Modification

13.31.6 The modification is necessary to improve the effectiveness and accuracy of the policy by ensuring consistency between Policy SA4, the housing trajectory and the evidence supporting the allocation. It would provide greater certainty regarding the scale of development anticipated on the site without altering the overall development strategy for the allocation.

13.32 Why is Policy SA4 not more specific on building heights (criterion 6.), in terms of whether the approach which is proposed would be justified and effective?

Council's response

13.32.1 Criterion 6 intentionally adopts a design-led approach rather than prescribing specific building heights across the allocation. More detailed consideration of building heights, massing and skyline composition is expected to be addressed through the masterplanning process required by criteria 15 and 16 of Policy SA4.

Evidence base

- N/A

Explanation

13.32.2 Policy SA4 covers a large and complex regeneration area, different site contexts and varying relationships with existing communities, the waterfront and the wider landscape. The Council considers that a single set of fixed height limits across the allocation would not provide sufficient flexibility to respond to these differing circumstances.

13.32.3 Criterion 6 therefore establishes the key design principles that should inform building heights, including the need to respond positively to existing built form, protect important views and avoid overbearing impacts on neighbouring areas, particularly The Strand. The policy is intended to be supplemented by the comprehensive masterplanning process required by criteria 15 and 16, through which applicants are

expected to collaboratively prepare a site-wide masterplan addressing matters such as character areas, urban form, density, building heights, massing and skyline composition.

13.32.4 The Council considers that the masterplan process is the most appropriate mechanism for establishing detailed height parameters because it enables these matters to be considered comprehensively across the allocation and informed by site-specific evidence, design analysis and stakeholder engagement.

Conclusion

13.32.5 The approach to building heights in Policy SA4 is justified and consistent with national policy, as it establishes clear design objectives whilst providing sufficient flexibility for a complex strategic allocation. However, greater clarity regarding the role of the masterplan in determining building heights could improve the effectiveness of the policy.

Proposed Main/Minor Modification

13.32.6 Amend the supporting text and/or criteria 15 and 16 of Policy SA4 to clarify that the site-wide masterplan shall establish a building heights, massing and skyline strategy for the allocation.

Reason for proposed Main/Minor Modification

13.32.7 The modification would improve the effectiveness of the policy by clarifying how detailed building height parameters will be determined, whilst retaining the flexibility necessary to respond to site-specific circumstances across this large regeneration area.

13.33 Who would be responsible for the green-blue infrastructure strategy under Policy SA4 (criterion 7.) for this strategic allocation?

Council's response

13.33.1 The Council considers that responsibility for preparing the green-blue infrastructure strategy would rest with the applicants and landowners promoting development within the allocation. The strategy would be expected to form part of the comprehensive masterplanning process required by Policy SA4.

Evidence base

- N/A

Explanation

13.33.2 The purpose of the green-blue infrastructure strategy is to ensure that green infrastructure, public open space, ecological networks, sustainable drainage, waterfront connections and wider environmental assets are planned comprehensively across the allocation rather than on a piecemeal basis. Given the size and complexity of

the River Waterfront allocation, the Council considers that these matters should be addressed through a coordinated site-wide masterplan prepared collaboratively by the applicants and landowners.

13.33.3 Whilst criterion 7 refers specifically to the preparation of a green-blue infrastructure strategy, the Council acknowledges that this requirement is more closely aligned to the masterplanning requirements contained within criteria 15 and 16 under the "Subsequent Design Principles" section of Policy SA4. The strategy would therefore be expected to be prepared as part of the wider site-wide masterplan and associated supporting documents rather than as a standalone requirement.

Conclusion

13.33.4 Policy SA4 remains justified and effective in seeking a coordinated approach to green-blue infrastructure across the allocation. However, the current drafting could provide greater clarity regarding responsibility for preparing the strategy and its relationship with the wider masterplanning process.

Proposed Main/Minor Modification

13.33.5 Move the reference to the preparation of a green-blue infrastructure strategy from criterion 7 to criteria 15 and/or 16 under the "Subsequent Design Principles" section, and clarify that it shall form part of the site-wide masterplan prepared collaboratively by the applicants and landowners.

Reason for proposed Main/Minor Modification

13.33.6 The modification would improve the effectiveness and clarity of the policy by ensuring that the green-blue infrastructure strategy is clearly embedded within the comprehensive masterplanning process for the allocation. It would also clarify who is responsible for preparing the strategy and how it will be coordinated across the site.

13.34 Where Policy SA4 states that the urban context will not provide for adequate space to meet all of the requirements for open space and playing pitch provision (criterion 8.), does that mean that less than the required provision under Policy DM21: New Open Space, Outdoor Sports and Play Spaces will be provided for open space and playing pitch provision on this strategic allocation?

Council's response

13.34.1 No. Criterion 8 of Policy SA4 does not reduce the quantity of open space, outdoor sports or play provision required by Policy DM21. Rather, it recognises that, due to the urban nature of the allocation, a proportion of the required provision may need to be delivered off-site in accordance with the circumstances set out in Policy DM21.

Evidence base

- N/A

Explanation

13.34.2 The River Waterfront allocation comprises a large-scale urban regeneration area where site constraints, existing development patterns and the need to achieve higher-density development may limit the ability to accommodate all forms of open space, outdoor sports and play provision within the allocation itself.

13.34.3 However, Policy DM21 establishes the standards and requirements for open space provision and already provides flexibility regarding how these requirements are met. In particular, criteria c., d. and e. of Policy DM21 identify circumstances where off-site provision, enhancement of existing facilities or financial contributions may be appropriate. Criterion 8(b) of Policy SA4 should therefore be read as identifying where such off-site provision may be delivered, rather than reducing the overall level of provision required.

13.34.4 The Council's intention is that residents of the allocation should continue to benefit from the quantity and quality of provision required by Policy DM21, whether that provision is delivered on-site, off-site, or through a combination of measures.

Conclusion

13.34.5 The Council considers that Policy SA4 is justified and effective when read alongside Policy DM21. The policy does not seek to reduce open space requirements but provides flexibility regarding the location and delivery of provision in the context of a high-density urban regeneration scheme. Greater clarity would, however, improve the effectiveness of the policy.

Proposed Main/Minor Modification

13.34.6 Amend criterion 8 of Policy SA4 to clarify that any off-site provision shall be provided in accordance with Policy DM21 and shall not reduce the overall quantity of open space, outdoor sports and play provision required by that policy.

Reason for proposed Main/Minor Modification

13.34.7 The modification is necessary to improve the effectiveness of the policy by making clear that Policy SA4 does not override or reduce the requirements of Policy DM21, but instead provides flexibility regarding how and where the required provision may be delivered.

13.35 Who would be responsible for the development brief for site SM16 (criterion 14.) and please explain why this site appears to be split on the Policies Map (two 'SM16' notations)?

Council's response

13.35.1 The Council considers that responsibility for preparing the development brief would rest with the developers and landowners promoting development within the allocation, working collaboratively through the masterplanning process. The two "SM16" notations on the Policies Map are intended to distinguish between the residential-led component of the allocation and the adjoining non-residential component associated with Basin 3 Campus, Chatham Waters.

Evidence base

- N/A

Explanation

13.35.2 As with the green-blue infrastructure strategy referred to elsewhere in Policy SA4, the Council considers that the development brief is a delivery mechanism that should be prepared by the relevant developers and landowners to guide the comprehensive redevelopment of the allocation. The development brief would be expected to sit alongside, and inform, the wider masterplanning process required by criteria 15 and 16 under the "Subsequent Design Principles" section of the policy.

13.35.3 The Council acknowledges that the current location of criterion 14 may create uncertainty regarding the relationship between the development brief and the wider masterplanning requirements. The Council considers that the requirement would be more logically located within the masterplanning section of the policy.

13.35.4 With regard to the Policies Map, the site is shown with two "SM16" notations because the wider Chatham Waters area contains both the residential-led allocation covered by Policy SA4 and the Basin 3 Campus area, which is identified separately under Policy SA14: Employment Sites. The duplicate notation was intended to assist interpretation of the two components. However, the Council acknowledges that the current presentation may cause confusion.

Conclusion

13.35.5 The Council considers that Policy SA4 remains justified and effective in requiring coordinated planning of the allocation. However, modifications would improve clarity regarding responsibility for the development brief and the identification of the different components of the allocation on the Policies Map.

Proposed Main/Minor Modification

13.35.6 Amend criterion 14 of Policy SA4 and relocate the requirement for a development brief to criteria 15 and/or 16 under the "Subsequent Design Principles" section, clarifying that the development brief shall be prepared collaboratively by the relevant developers and landowners as part of the site-wide masterplan.

13.35.7 Amend the Policies Map to distinguish the two components currently shown as "SM16", for example by relabelling them as "SM16a" (residential-led component) and "SM16b" (Basin 3 Campus employment component).

Reason for proposed Main/Minor Modification

13.35.8 The modifications are necessary to improve the effectiveness and clarity of the policy. Relocating the development brief requirement would align it with the wider masterplanning process, whilst amending the Policies Map would provide greater certainty regarding the different components of the allocation and avoid confusion arising from the use of two "SM16" notations.

13.36 Who would be responsible for the masterplans and infrastructure delivery plans/phasing plans (criteria 15. to 18.)?

Council's response

13.36.1 The Council considers that responsibility for preparing masterplans and phasing plans should rest with the developers and landowners promoting development within the allocation, working collaboratively where necessary. The Council would be responsible for maintaining the Infrastructure Delivery Plan (IDP) and monitoring infrastructure delivery throughout the plan period.

Evidence base

- N/A

Explanation

13.36.2 Criteria 15 to 18 are intended to ensure that development across the River Waterfront allocation is comprehensively planned and delivered in a coordinated manner. The Council considers that the preparation of site-wide masterplans and phasing plans is appropriately undertaken by the developers and landowners, as they are best placed to demonstrate how development parcels, infrastructure requirements, public realm, movement networks and delivery programmes will be coordinated across the allocation.

13.36.3 However, the Council acknowledges that criterion 17 may not clearly distinguish between the role of the applicants and the role of the Council. The IDP is a Council document that is maintained and periodically updated to reflect infrastructure requirements, delivery programmes, funding arrangements and engagement with infrastructure providers. By contrast, developers should be responsible for preparing site-specific phasing plans demonstrating how development will be delivered in accordance with the allocation policy and the wider IDP.

13.36.4 The Council therefore considers that the policy would benefit from greater clarity regarding these separate responsibilities.

Conclusion

13.36.5 The Council considers that Policy SA4 remains justified and effective in requiring comprehensive planning and coordinated delivery across this strategic allocation. However, modifications are necessary to clarify responsibility for different implementation documents and improve the effectiveness of the policy.

Proposed Main/Minor Modification

13.36.6 Amend criteria 15 to 18 of Policy SA4 to clarify that site-wide masterplans and phasing plans shall be prepared collaboratively by the developers and landowners promoting the allocation.

13.36.7 Amend criterion 17 to refer to compliance with, and alignment to, the Council's IDP, rather than implying that developers are responsible for preparing or maintaining the IDP itself.

Reason for proposed Main/Minor Modification

13.36.8 The modification is necessary to improve the effectiveness and precision of the policy by clearly distinguishing between the responsibilities of developers and the responsibilities of the Council. This will provide greater certainty for applicants and decision-makers and ensure that the policy can be applied consistently through the development management process.

13.37 Which of these plans would be site specific and which would be strategic allocation wide?

Council's response

13.37.1 The Council considers that the masterplans, green-blue infrastructure strategy and phasing plans referred to in criteria 15 to 18 should be prepared at the strategic allocation scale rather than on a site-by-site basis. Site-specific details would then come forward through individual planning applications.

Evidence base

- N/A

Explanation

13.37.2 The purpose of criteria 15 to 18 is to secure a coordinated approach to the comprehensive regeneration of the River Waterfront allocation. The Council's intention is that the principal framework documents, including the masterplan, green-blue infrastructure strategy and phasing plans, should address the allocation as a whole in order to coordinate land uses, movement networks, infrastructure provision, public realm, waterfront access and development phasing across site boundaries.

13.37.3 This approach reflects the wording of criterion 15, which requires sites GN6, GN15 and SMI6 to collaborate in preparing a masterplan. Although GN6 has planning permission, the Council considers that a coordinated strategic framework remains beneficial to ensure integration between the different development parcels and the wider River Waterfront allocation.

13.37.4 The Council also notes that parts of the allocation are in different ownerships and contain a range of existing uses. For example, GN3 remains in operational use as a Council waste collection vehicle depot. The purpose of the masterplanning process is to provide an overarching framework within which planning applications can come forward in a coordinated manner.

Conclusion

13.37.5 The Council considers that the strategic allocation-wide approach is justified and effective, as it promotes comprehensive planning and coordinated infrastructure delivery across a large and complex regeneration area. However, greater clarity regarding the scope of the various plans would improve the effectiveness of the policy.

Proposed Main/Minor Modification

13.37.6 Amend criteria 15 to 18 of Policy SA4 to clarify that the masterplan, green-blue infrastructure strategy and phasing plans shall be prepared on a strategic allocation-wide basis, with site-specific details to be addressed through individual planning applications and supporting documentation.

Reason for proposed Main/Minor Modification

13.37.7 The modification is necessary to improve the effectiveness and clarity of the policy by distinguishing between strategic allocation-wide planning documents and site-specific implementation details. This would provide greater certainty for applicants and decision-makers and better reflect the Council's intended approach to the comprehensive redevelopment of the allocation.

13.38 Is the potential funding from Homes England agreed (criterion 22.) and do these requirements need to be fulfilled for development to proceed on (any) of the sites under Policy SA4?

Council's response

13.38.1 No. Potential funding from Homes England is not agreed. The requirements set out in criterion 22 are not a prerequisite for development to proceed on the sites allocated under Policy SA4.

Evidence base

- N/A

Explanation

13.38.2 As it stands, there is no funding agreement with Homes England that would secure the delivery of the development envisaged by Policy SA4. Furthermore, the funding priorities and investment programmes of Homes England may change over time and are not controlled by the Local Plan process.

13.38.3 Criterion 22 refers to a potential funding source rather than a land-use planning requirement or development management criterion. The allocation is capable of coming forward through a range of delivery mechanisms, funding arrangements and development programmes, and the availability of funding from Homes England is not necessary to establish the principle of development or the soundness of the allocation.

Conclusion

13.38.4 The allocation remains justified without reliance upon a specific funding agreement with Homes England.

Proposed Main/Minor Modification

13.38.5 Delete criterion 22 of Policy SA4.

Reason for proposed Main/Minor Modification

13.38.6 The modification is necessary to improve the effectiveness and clarity of Policy SA4. Criterion 22 refers to a potential funding source rather than a planning requirement. Removing criterion 22 would ensure that the policy focuses on relevant land-use planning matters.

13.39 Do the Policy SA4 criteria provide appropriate safeguards for heritage assets and ecological designations that may be impacted?

Council's response

13.39.1 The Council considers that Policy SA4 provides a degree of protection for heritage assets and ecological interests through its design, waterfront, public realm and masterplanning requirements. However, the policy could be strengthened by making more explicit reference to the protection and enhancement of heritage assets and ecological designations, consistent with national policy.

Evidence base

- N/A

Explanation

13.39.2 The River Waterfront allocation contains a number of heritage and environmental sensitivities that will require careful consideration as development proposals come forward. Criterion 14 requires the preparation of a development brief for site SMI6 and the Council notes that a similar approach elsewhere in Medway has been supported by Historic England. However, the Council considers that the

requirement for a development brief is more appropriately located within the "Subsequent Design Principles" section of the policy, alongside the wider masterplanning requirements.

13.39.3 The Council also acknowledges that Policy SA4 does not currently make explicit reference to the heritage tests contained within Chapter 16 of the NPPF (2024), nor does it expressly refer to the need to avoid adverse impacts on designated ecological sites and secure biodiversity enhancement consistent with paragraph 187 of the NPPF (2024). Whilst these matters would continue to be addressed through other Local Plan policies, national policy and project-level assessment, greater clarity within the allocation policy would improve its effectiveness.

Conclusion

13.39.4 The Council considers that Policy SA4 is broadly justified and consistent with national policy, but that additional policy safeguards relating to heritage assets and ecological designations would improve its effectiveness and provide greater certainty for applicants and decision-makers.

Proposed Main/Minor Modification

13.39.5 Amend Policy SA4 to include an additional criterion requiring development proposals to: "Conserve and, where appropriate, enhance the significance of heritage assets and their settings, having regard to the requirements of national policy, and protect designated and non-designated ecological assets, avoiding adverse impacts on ecological designations and securing appropriate mitigation, compensation and biodiversity enhancement where required."

13.39.6 Relocate the requirement for the SMI6 development brief from criterion 14 to the 'Subsequent Design Principles' section of the policy.

Reason for proposed Main/Minor Modification

13.39.7 The modification is necessary to improve the effectiveness of Policy SA4 by ensuring that the policy contains clear and explicit safeguards relating to heritage assets and ecological designations. Relocating the development brief requirement would also improve the structure and clarity of the policy by placing it within the wider masterplanning framework for the allocation.

13.40 Do the Policy SA4 criteria provide appropriate safeguards for riverboat moorings, or else for their affordable re-provision for their residents?

Council's response

13.40.1 The Council considers that Policy SA4 provides appropriate safeguards for existing boat moorings through criterion 10, which requires the reconfiguration of boat moorings as part of the comprehensive redevelopment of the allocation. However, the

Council is not aware that the moorings within the allocation are used for residential purposes and therefore does not consider that specific provision relating to the affordable re-provision of residential moorings is required.

Evidence base

- N/A

Explanation

13.40.2 Criterion 10 of Policy SA4 expressly refers to the reconfiguration of boat moorings, thereby recognising the presence of existing mooring facilities within the allocation and the need to consider them as part of the redevelopment scheme. The Council understands these moorings principally to serve leisure and recreational boating activities rather than residential use.

13.40.3 This is consistent with Figure 5 of the submitted Plan (ref: A1, PDF page 96), which identifies residential marina locations elsewhere in Medway but does not identify the River Waterfront allocation as a residential marina location. Furthermore, where residential moorings and houseboats are concerned, Policy H7 provides a specific policy framework for the protection and management of houseboat moorings.

Conclusion

13.40.4 The Council considers that Policy SA4 is justified and effective in relation to existing moorings. The policy provides an appropriate framework for considering the future configuration of boat moorings as part of the comprehensive redevelopment of the site, and the Council has not identified the need additional policy requirements relating to the re-provision of residential moorings.

Proposed Main/Minor Modification

13.40.5 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.41 Under the 'Site-specific Information table', why is the number of new homes provided less than the overall number under the strategic allocation (criterion 2.) by approximately 200 units?

Council's response

13.41.1 Please see the Council's response to question 13.31.

13.42 Under the 'Site-specific Information table', would site GN6 be delivered within the first 5 years of the plan period, as Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6) indicates there would be no completions within the first 5 years?

Council's response

13.42.1 No. Based on the latest housing trajectory, site GN6 is not currently expected to deliver completions within the first five years of the Plan period. However, the Council notes that planning permission was granted for the site in March 2026 and, consequently, delivery could occur sooner than currently anticipated.

Evidence base

- Housing Delivery Topic Paper (ref: B22.5, Appendix, PDF page 17)

Explanation

13.42.2 The "Plan period (Years)" column within the site-specific information table was derived from the housing trajectory that informed the Regulation 19 version of the Plan. Following submission of the Plan, the Council updated its housing trajectory to reflect the latest information regarding site deliverability, infrastructure requirements, lead-in times and anticipated build-out rates.

13.42.3 The updated trajectory is set out in the Housing Delivery Topic Paper (ref: B22.5, Appendix, PDF page 17) and is consistent with Appendix F of the Council's Response to the Inspectors' Initial Queries (ref: MLP/ED6, Appendix F, PDF page 84), both of which indicate that no completions are currently anticipated from GN6 within the first five years of the Plan period.

13.42.4 Notwithstanding this position, planning permission was granted for GN6 in March 2026. As a result, development is capable of coming forward sooner than assumed in the latest trajectory if market conditions, site preparation works and developer programmes allow. The Council therefore regards the trajectory as the most likely delivery scenario rather than a fixed prediction of when development will occur.

Conclusion

13.42.5 The Council considers that the allocation remains justified and effective, but acknowledges that the delivery assumptions contained within the site-specific information table are no longer consistent with the latest housing trajectory evidence. A modification is therefore required to ensure consistency between the allocation policy and the most up-to-date evidence on deliverability, whilst recognising that the grant of planning permission provides the potential for earlier delivery.

Proposed Main/Minor Modification

13.42.6 Amend the "Plan period (Years)" information for site GN6 within the site-specific information table to align with the latest housing trajectory.

Reason for proposed Main/Minor Modification

13.42.7 The modification is necessary to improve the effectiveness, accuracy and consistency of the Plan by ensuring that the site-specific information reflects the Council's latest assessment of housing delivery and phasing assumptions for GN6,

whilst acknowledging that actual delivery may occur sooner following the grant of planning permission.

13.43 Under the 'Site-specific Information table' and Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6), site SM16 is in part to be delivered beyond the plan period. Have these units been included, or excluded from, the Plan's housing supply figures?

Council's response

13.43.1 The 800 homes anticipated to be delivered from site SMI6 beyond the Plan period have been excluded from the Plan's housing supply figure. The housing supply includes only those dwellings expected to be delivered within the Plan period.

Evidence base

- Housing Delivery Topic Paper (ref: B22.5, Appendix, PDF page 18)

Explanation

13.43.2 The Council's latest housing trajectory identifies that part of the capacity of site SMI6 will be delivered after the end of the Plan period. In accordance with standard plan-making practice, these homes are not counted towards the Plan's housing supply because they are not expected to be completed within the Plan period.

13.43.3 This approach is reflected consistently in the Housing Delivery Topic Paper (ref: B22.5, Appendix, PDF page 18) and Appendix F of the Council's Response to the Inspectors' Initial Queries (ref: MLP/ED6, Appendix F, PDF page 82). The Council's delivery assumptions for SMI6 have also been agreed with Peel Waters through a Statement of Common Ground (ref: MLP/ED24E).

Conclusion

13.43.4 The Council considers that the Plan is justified and effective, as the housing supply figures are based on realistic delivery assumptions and exclude dwellings expected to be completed beyond the Plan period. The approach provides a sound and transparent basis for assessing housing delivery and supply.

Proposed Main/Minor Modification

13.43.5 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.44 Under the 'Site-specific Information table', will any of the sites involve the relocation of the existing uses, including employment and tenancies, and will this have a bearing on deliverability?

Council's response

13.44.1 Yes. Some sites within the River Waterfront allocation involve the relocation of existing uses and the expiry of existing tenancies. However, these matters have been taken into account in the Council's housing trajectory and do not undermine the deliverability of the allocation.

Evidence base

- N/A

Explanation

13.44.2 The existing business leases on site SMI6 (Chatham Waters) are due to expire. The delivery assumptions associated with these arrangements have been reflected in the agreed housing trajectory and have been discussed and agreed with the site promoter through a Statement of Common Ground with Peel Waters (ref: MLP/ED24E).

13.44.3 Site GN3 (Pier Approach Road Depot) is currently occupied and required for waste collection and street cleansing operations. The Council has commissioned a feasibility study into alternative depot locations. Whilst a replacement facility is unlikely to be operational for at least two years, this constraint has been taken into account in the housing trajectory, which assumes delivery from Year 6 of the Plan period.

13.44.4 In contrast, site GN6 (Former Gasworks Site, north of Pier Road, Gillingham) is a vacant brownfield site and benefits from planning permission.

Conclusion

13.44.5 The Council considers that the allocation remains justified and effective. Existing uses, operational requirements and tenancy arrangements have been taken into account in the latest housing trajectory and delivery assumptions. Consequently, whilst these matters influence the timing of development on certain sites, they do not undermine the overall deliverability of Policy SA4.

Proposed Main/Minor Modification

13.44.6 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.45 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA4, as set out in its Phase 1 Hearing Statement.

Council's response

13.45.1 Yes. Sites GN3, GN6, GN15 and SMI6 are all located within Flood Zone 3 or partly within Flood Zone 3. However, these allocations are justified through the Strategic Flood Risk Assessment process, including the Sequential Test and Level 2 Strategic Flood Risk Assessment, and the Council considers that flood risk can be appropriately mitigated without undermining the deliverability of the allocation.

Evidence base

- Strategic Flood Risk Assessment (Level 1) (refs: B6.1 and B6.2)
- Sequential Test Report (ref: B6.5, PDF page 27)
- Strategic Flood Risk Assessment (Level 2) (ref: B6.3, PDF pages 47, 77, 81 and 87)
- Site-Specific Flood Risk Topic Paper (ref: B22.3, PDF pages 6-7)

Explanation

13.45.2 The River Waterfront allocation has been informed by the findings of the Strategic Flood Risk Assessment (Level 1) (refs: B6.1 and B6.2), the Sequential Test Report (ref: B6.5) and the Strategic Flood Risk Assessment (Level 2) (refs: B6.3). These assessments identified areas of flood risk and informed the Council's consideration of alternative development options and the suitability of sites for allocation.

13.45.3 Sites GN3, GN6, GN15 and SMI6 are all located within Flood Zone 3 or partly within Flood Zone 3 (ref: B6.5, PDF page 27). However, the wider evidence base demonstrates that it was not possible to meet Medway's development needs solely through sites located in areas of lower flood risk. The Council therefore considered wider planning objectives, including brownfield regeneration, sustainable development, housing delivery and the spatial strategy, in determining the suitability of these allocations.

13.45.4 The Level 2 Strategic Flood Risk Assessment identifies site-specific measures and considerations necessary to manage flood risk for the four site allocations under Policy SA4: GN3 (ref: B6.3, PDF page 81); GN6 (ref: B6.3, PDF page 47); GN15 (ref: B6.3, PDF page 77); and SMI6 (ref: B6.3, PDF page 87).

13.45.5 Furthermore, criterion 10(b) of Policy SA4 requires the provision of flood mitigation measures and/or a flood defence wall as part of the comprehensive redevelopment of the allocation.

13.45.6 With regard to the comments of the Environment Agency, the Council has addressed these matters within the Site-Specific Flood Risk Topic Paper (ref: B22.3, PDF pages 6-7), which notes that development can be directed away from areas of Flood Zone 3b and, where practicable, away from Flood Zone 3a through the detailed design process and site layout.

Policy SA5: Strood Town Centre and Surrounds

13.46 Is Policy SA5 consistent with Policy S20: Strood District Centre?

Council's response

13.46.1 There is consistency between Policies SA5 and S20. However, the Council recognises that the opportunity to provide clarity on the requirements when read across both policies through modifications to policy S20.

Evidence base

a. N/A

Explanation

13.46.2 Whilst Policy S20 does articulate within the first paragraph, the opportunities for providing retail and housing. Retail and housing could be listed as one of the guiding criteria for proposals. The aspirations for enhancing existing heritage should also be captured within this policy.

Conclusion

13.46.3 The Council considers that Policy SA5 and S20 are justified by proportionate evidence, effective, positively prepared and consistent with national policy. Clarification can aid in improving the effectiveness of policies when read together.

Proposed Main/Minor Modification

13.46.4 Include text as additional bullets beneath paragraph 4 (ref: A1, page145):

'**1. Delivery of housing and retail,**

2. Explore opportunities to reveal the historic townscape, enhance and ensure proposals complement existing heritage.'

Reason for proposed Main/Minor Modification

13.46.5 To improve the effectiveness of policies when read together.

13.47 Is there duplication between Policy SA5 and Policy S20, and does this impact on the effectiveness of the policy?

Council's response

13.47.1 There is duplication noted regarding the transport interchange and the improvements to Strood rail station. Clarity can be provided through modifications.

Evidence base

a. N/A

Explanation

13.47.2 Detail regarding the transport ambitions is better placed in Policy SA5. Modifications are therefore proposed to wording within Policy S20.

Conclusion

13.47.3 The Council considers that Policy S20 and SA5 are justified by proportionate evidence, effective, positively prepared and consistent with national policy. Modifications to Policy S20 will provide clarity and improve the effectiveness of policies when read together.

Proposed Main/Minor Modification

13.47.4 Amend bullets 5 and 6 at paragraph 4 of Policy S20 (ref: A1, page 145):

'**Delivery of a** ~~A~~ transport interchange **to improve wider accessibility within Medway and beyond**. ~~(within or adjacent to the centre), providing a destination for a Bus Rapid Transit corridor connection..... to London Victoria services.'~~

Improving pedestrian access and new platforms.... to enable access to London Victoria services. **Improving accessibility to Strood rail station and services to destinations beyond Medway.**'

Reason for proposed Main/Minor Modification

13.47.5 To provide clarity and improve the effectiveness of policies when read together.

13.48 How has the circa 1,079 capacity for this strategic allocation been derived (criterion 3.)?

Council's response

13.48.1 The Housing Delivery Topic Paper Appendix (ref: B22.5) sets out the latest housing trajectory for the Medway Local Plan (ref: A1) across its plan period. The estimated capacity for each site listed within Policy SA1 (ref: A1) is added together over the entire plan period using the Housing Delivery Topic Paper Appendix (ref: B22.5, page 18) and concludes a total capacity of 1,141.

13.48.2 Additionally, the Council recognises that some individual site capacities within the housing trajectory (ref: B22.5) differ from the policy and proposes to rectify these through minor modifications.

Evidence base

a. Housing Delivery Topic Paper Appendix (ref: B22.5), page 18.
b. Medway Local Plan (ref: A1), pages 263 & 266.

Explanation

13.48.3 The most up-to-date housing trajectory is set out in the Appendix to the Housing Delivery Topic Paper (ref: B22.5), which supersedes the capacity for site SR25 as set out in Policy SA5 (pages 263 and 266).

Conclusion

13.48.4 The Council considers that Policy SA5 is justified by proportionate evidence, positively prepared and consistent with national policy. The effectiveness of the policy could be improved.

Proposed Main/Minor Modification

13.48.5 Amend the number of homes in criterion 3. Medway Local Plan (ref: A1), page 263, criterion 3:

'3. Identified sites will deliver circa ~~1,079~~ **1,141** homes.'

13.48.6 Within the table in policy SA5, amend capacity for site SR25. Medway Local Plan (ref: A1), page 266, row 4, column 4:

'Circa ~~152~~ **181**'

Reason for proposed Main/Minor Modification

13.48.7 To ensure the effectiveness of policy SA1.

13.49 Policy SA5 includes a number of supporting documents, including the Strood Waterfront Development Brief and a Town Centre Masterplan. Is it intended these documents would be elevated in status to become part of the development plan by virtue of their inclusion within the policy?

Council's response

13.49.1 No, the documents would not be elevated to development plan status but do provide guidance on design and other site-specific issues.

Evidence base

a. N/A

Explanation

13.49.2 The Council proposes a modification to the policy wording at criterion 4 and insertion of new supporting text to paragraph 14.6.2.

Conclusion

13.49.3 The Council considers that SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.49.4 Delete text from criterion 4 (ref: A1, page 263):

'4. Development proposals shall demonstrate compliance with relevant Local Plan policies~~, The Strood Waterfront Development Brief (2018) and the Strood Town centre masterplan 2019~~ and/or updated guidance where relevant.'

13.49.5 Insert new text to paragraph 14.6.2 (ref: A1, page 263):

'**14.6.2 The Strood Waterfront Development Brief (2018) and the Strood Town Centre masterplan (2019) were prepared by Medway to guide these significant areas for growth in a coherent and comprehensive way. These guidance documents remain relevant to provide a direction for the future taking into account various influences.** The Strood Waterfront Development Framework is being revisited and will provide a framework ~~which will provide~~ **of** guidance for planning applications. **Development proposals must have regard to any environmental, social, design and economic objectives including locational specific guidance within the Strood Waterfront Development Framework and Strood Town Centre masterplan.**'

Reason for proposed Main/Minor Modification

13.49.6 To provide clarity of requirements and improve effectiveness of the policy.

13.50 The supporting text (paragraph 14.6.2) states that the Strood Waterfront Development Brief is being revisited. What bearing does that have on Policy SA5?

Council's response

13.50.1 Please see modifications proposed at 13.49.

Evidence base

a. N/A

Explanation

13.50.2 N/A

Conclusion

13.50.3 The Council considers that Policy SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.50.4 N/A

Reason for proposed Main/Minor Modification

13.50.5 N/A

13.51 At what stage would the transport interchange and bus corridor (criterion 6.) be provided and how would this relate to the development of this strategic allocation and individual sites?

Council's response

13.51.1 The provision of a transport interchange offering improved bus and rail interconnectivity at Strood is part of the intended specification for Allocation SNF41 (Strood Riverside). Bus priority measures forming a bus corridor are being and will continue to be developed through engagement with developers promoting allocations on the Hoo Peninsula (ref: A1, Policy SA8, page 280) and will be included in the design development of highway mitigation measures. While the interchange and bus corridor will support sustainable mode choices to and from allocations on the Hoo Peninsula, it is also of strategic importance to allocations in and around Strood centre. Policy SA5 criteria 6c (ref: A1, page 263) refers to a network of pedestrian and cycle links which will increase connectivity to public transport routes and the interchange will enable greater use of the bus priority between Strood and Medway City Estate (ref: A1, Policy SA13, page 297) and offer sustainable travel options to employment related allocations within Policy SA14 (ref: A1, page 298) at Kingsnorth (HHH35) and MedwayOne (HHH36) (ref: A1, page 300).

13.51.2 The Infrastructure Delivery Plan (ref: B2, page 97) points to the Strood Transport Hub being delivered at any point during the life of the plan (0-15 years), however as its core function relates to the sustainable travel programme (ref: B2, row above on page 97) its target for delivery is more likely to be around the 6-10 year mark. This also aligns with the anticipated timeframe for Allocation SNF41 (ref: A1, page 266) of which the interchange will be part and the reference to design, fund and deliver substantial bus interventions by 2036 on Page 18 of the Mode Share Strategy (ref: B18.3).

Evidence base

a. B2: Infrastructure Delivery Plan, page 97
b. A1: pages 263, 280, 298, 300

Explanation

13.51.3 N/A

Conclusion

13.51.4 The Council considers that Policy SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.51.5 N/A

Reason for proposed Main/Minor Modification

13.51.6 N/A

13.52 At what stage would the railway station improvements (criterion 7.) be provided and how would this relate to the development of this strategic allocation and individual sites?

Council's response

13.52.1 The referenced railway station improvements are not currently considered a priority for Network Rail. While referenced in other sources such as Transport for the South East Transport Strategies, the scheme would be dependent on Network Rail and is currently considered aspirational. It is not referenced in the Infrastructure Delivery Schedule (ref: B2, page 95). Medway Council are engaged with Network Rail in relation to travel plans for the station, but these do not extend to the provision of additional high-level platforms. The existing level of service offered at Strood station, including the fastest connection to London of any station in Medway, is more than compatible with the remainder of Policy SA5. With this in mind, if it is found that inclusion of criterion 7 makes policy SA5 unsound, it should be removed by a main modification.

Evidence base

a. B2: Infrastructure Delivery Plan, page 95

Explanation

13.52.2 N/A

Conclusion

13.52.3 The Council considers that SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy. A modification could provide clarity.

Proposed Main/Minor Modification

13.52.4 If absent such a modification policy SA5 is considered to be unsound, the Council would propose the deletion of criterion 7 (ref: A1, page 264):

'~~7. Greater accessibility to London Victoria services will be achieved by delivering improvements to Strood rail station by way of new platforms and improved pedestrian access.~~'

Reason for proposed Main/Minor Modification

13.52.5 To provide clarity and effectiveness of the policy.

13.53 Are the transport improvements proposed for this strategic allocation shown on the Policies Maps?

Council's response

13.53.1 No. Public transport routes are not shown on the policies maps as full route optioneering studies are required. However, the South West Policy map (ref: A2.4) shows the proximity of central allocations to Strood Station and Allocation SNF41.

Evidence base

a. A2.4: Submission Policies Map - South West

Explanation

13.53.2 N/A

Conclusion

13.53.3 The Council considers that Policy SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.53.4 N/A

Reason for proposed Main/Minor Modification

13.53.5 N/A

13.54 Why does the increase in housing provision lead to a healthy living centre requirement at site SNF20 (criterion 9.) as this site is only allocated for circa 15 units under the Site-specific Information table'?

Council's response

13.54.1 The provision of 15 units on this site does not trigger the need for a healthy living centre. The housing increase in the Strood area was the trigger for potential enhancement or reprovision for a new healthy living centre. For the interim, the site has been put forward for residential to allow flexibility following the NHS assets review to confirm whether the existing Health Centre requires enhancement or redevelopment.

13.54.2 The Council engaged with the NHS and the Integrated Care Board (ICB) (ref: B2, page 11, paragraphs 1.3.1 and 1.3.2) regarding future requirements that may be triggered by the increase in housing planned in Strood including at site allocation SA6. During those discussions, the ICB clarified a review of existing assets was required before determining whether a new facility or an enhancement to existing facilities would be needed to make it fit for purpose.

13.54.3 Additionally, the NHS regulation 19 responses (ref: C1.2, File U, page 111, 112 and 4) stated the lack of confirmation related to site SNF20. The Council would therefore propose a modification to criterion 9.

13.54.4 The site has been submitted as part of the call for sites exercise. The capacity of 15 units is a conservative approach informed by a median benchmark to provide some flexibility.

Evidence base

a. B2: Infrastructure Delivery Plan, page 11, paragraphs 1.3.1 to 1.3.3, page 52 to 60
b. C1.2: Regulation 19 (2025) responses, File U, pages 4, 111 and 112

Explanation

13.54.5 The background, evidence and proposed infrastructure requirements are set out in the Infrastructure Delivery Plan (ref: B2, pages 52-60). Discussions with the ICB are ongoing. The Infrastructure Delivery Plan will be regularly updated and will capture any updates emerging from the further work the NHS estates team need to undertake (ref: B2, page 11, paragraph 1.3.3).

13.54.6 Should the ICB confirm the ability to deliver more housing, this will add to the total housing numbers for site SNF20 within the 'site specific information' table within policy SA5. Based on the increase in housing planned in Strood, a new healthy living centre may be required or the existing 'Keystone Health Centre' may need enhancements. Modifications to criterion 9 will provide flexibility for an appropriate response in future.

Conclusion

13.54.7 The Council considers that Policy SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.54.8 Amend criterion 9 of Policy SA5 (ref: A1, page264):

'9. ~~The increase in housing provision will require of an~~ **An** expanded/improved/new Healthy living centre **will be required**. **Provision should be explored** at SNF20'

13.54.9 Amend entry within site specific information table, Policy SA5 (ref: A1, page265, row6, third column:

'Residential **and the potential for a health facility'**

Reason for proposed Main/Minor Modification

13.54.10 To provide clarity.

13.55 To what extent have healthcare requirements been considered in Policy SA5, including evidence?

Council's response

13.55.1 Please see the answer to question 13.54 above.

Evidence base

a. N/A

Explanation

13.55.2 N/A

Conclusion

13.55.3 The Council considers that Policy SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.55.4 N/A

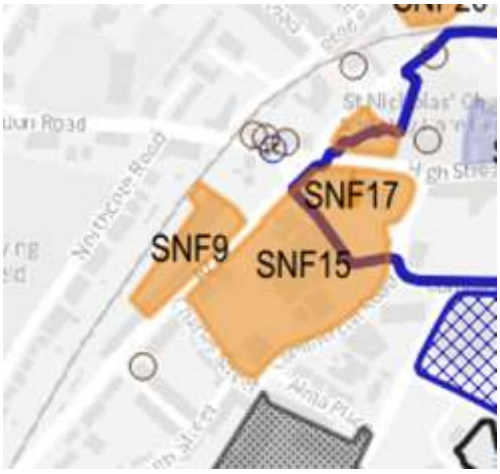
Reason for proposed Main/Minor Modification

13.55.5 N/A

13.56 Why do certain sites (criterion 14.) require a masterplan?

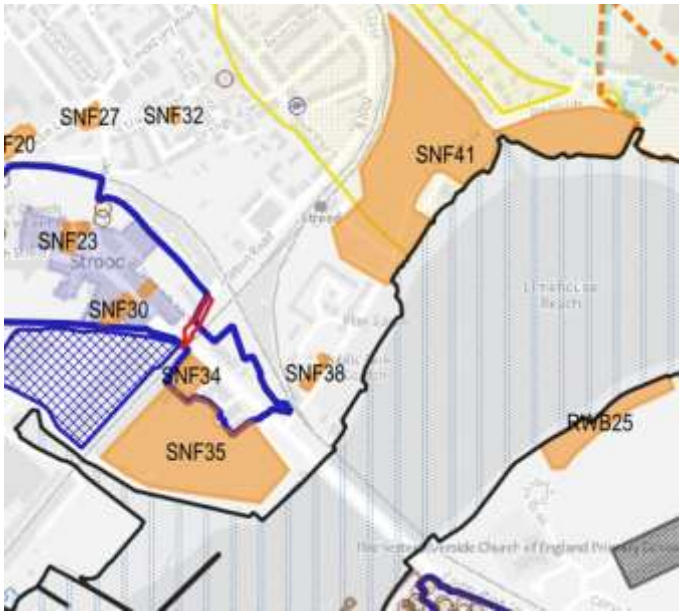
Council's response

13.56.1 The cluster of sites set out at criterion 10 are located adjacent to one another. Site SNF15 is Council owned, represents the largest site, and provides a unique opportunity for the Council to work collaboratively to deliver a comprehensive scheme, which together will have a bigger impact rather than individual schemes brought forward separately.



Extract from the Submission Policies Map – South West

13.56.2 Similarly, sites SNF34, SNF35 and SNF41 sit along the waterfront and will need to consider appropriate flood mitigation and accessibility requirements.



Extract from the Submission Policies Map – South West

13.56.3 A coordinated masterplan for this area will ensure that appropriate strategies are put in place to address wider matters such as flood mitigation.

13.56.4 However, the Council does recognise that the wording at criterion14 could be modified to provide clarity of requirements, i.e. for two coordinated masterplans to be collaborated upon separately.

Evidence base

a. N/A

Explanation

13.56.5 N/A

Conclusion

13.56.6 The Council considers that Policy SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.56.7 Amend text at criterion 14 of Policy SA5 (ref: A1, page 264) to form two separate criterion:

'14. The applicants for sites SNF9, SNF15~~,~~ **and** SNF17~~, SNF34, SNF35 and SNF41~~ will collaborate to produce a masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details.

15. The applicants for sites SNF34, SNF35 and SNF41 will collaborate to produce a masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details.'

The subsequent bullets will be renumbered accordingly.

Reason for proposed Main/Minor Modification

13.56.8 N/A

13.57 Do the criteria provide appropriate safeguards for heritage assets that may be impacted?

Council's response

13.57.1 Policy SA5 does provide detailed considerations at criterion 10 and 11 (ref: A1, page 264). Further clarification of requirements as design principles would assist in ensuring heritage assets are safeguarded. This would require modifications.

Evidence base

a. N/A

Explanation

13.57.2 Criterion 10 and 11 of Policy SA5 point to how heritage can be revealed through regeneration of key sites and protect existing heritage assets from being impacted upon. However, ensuring these aspects are carried forward as additional design principles will reinforce appropriate review and consideration of impact and how this can be avoided. The Council therefore proposes a modification to include further design principles beneath subheading 'Subsequent design principles.'

Conclusion

13.57.3 The Council considers that Policy SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy. Clarification of design principles will ensure an appropriate approach is taken in safeguarding existing heritage.

Proposed Main/Minor Modification

13.57.4 Insert text to become the new criterion 15 in Policy SA5 (ref: A1, page264):

'**15. Demonstrate consideration of the historic environment and the townscape by submitting with a planning application, a:**

a. Views analysis

b. Landscape and townscape assessments that have been used to inform the design of the scheme

c. Heritage, townscape and visual impact assessment'

The subsequent bullets will be renumbered accordingly.

Reason for proposed Main/Minor Modification

13.57.5 To clarify requirements, ensuring appropriate safeguards can be put in place for heritage assets.

13.58 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/3b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA5, as set out in its Phase 1 Hearing Statement.

Council's response

13.58.1 The Sequential Test Report (ref: B6.5) lists ten sites within flood zone 3 or partly within Flood Zone 3 (within multiple flood zones). The detailed assessment within the Level 2 Strategic Flood Risk Assessment (ref: B6.3) identifies nine sites predominantly in Flood Zone 3/3b. The Strategic Flood Risk Assessment – Level 2 report (B6.3) sets out an assessment for each site and makes detailed recommendations on further assessment work required, how the Environment Agency's requirements can be met and what appropriate mitigations may be needed. As an example, the analysis of SNF15 is found at page 51 (pdf). The Council considers this to be an appropriate response to the Environment Agency's comments.

13.58.2 The Environment Agency (Regulation 19 response paragraph 14.6, File U page 44 of the pdf) contend that allocation SA5 is unsound as it is based upon a misplaced assumption that the site (or part of it) will be taken out of Flood Zone 3b as a result of flood defence works. The approach set out at paragraph 13.58.3 will be followed.

13.58.3 The remaining sites will require more consideration including the application of a sequential approach regarding the layout of the site by locating the most vulnerable elements in the lowest risk areas. This is set out in the Strategic Flood Risk Assessment – Level 2 (November 2025) (ref: B6.3 page 52), alongside other actions and mitigations, which the Council and developers can follow including the satisfaction of the exceptions test where needed. On this basis adequate mitigation can be agreed with the Environment Agency and deliverability would therefore not be impacted upon.

Evidence base

a. B6.5 Strategic Flood Risk Assessment – Sequential Test Report, pdf page Insert examination document reference, title, PDF page number 27, Table of sites located within High Risk Areas.
b. B6.3 Strategic Flood Risk Assessment – Level 2 (November 2025), pdf pages 51, 53, 74, 58, 73, 54, 63, 38, 69, 36.

Explanation

13.58.4 The table below provides, in combination with the Council's response above, a detailed explanation regarding the six sites within policy SA5 identified within Flood Zone 3.

Site ref	Flood Zone %*				Consented	Comments	Approach
	1	2	3**	3b			
SNF15	36.9	7.2	55.9	Approx. 36.9	Residential consent expired. Council owned.	B6.3 mitigations include EA's requirements. Flood resistance and resilience measures could be included. Safe access and egress must be achieved.	Exceptions Test required. Required actions/ mitigations
SNF23			100		Consent expired	EA considers sound	Proportionate contributions will be considered.
SNF24			100		Yes	EA considers sound	Proportionate contributions will be considered.
SNF30			100			EA considers sound	Proportionate contributions will be considered.
SNF31			100		Yes	EA considers sound	Proportionate contributions will be considered.
SNF32	66.7		33.3		Yes	EA considers sound	Proportionate contributions will be considered.
SNF34			100	8.7		Safe access and egress must be achieved.	B6.3 actions and mitigations to be implemented. Proportionate contributions will be considered.
SNF35	0.05	0.05	99.9	16.2	Consent for flood defences	EA considers sound	Underway

SNF38			100	100	Consent expired	B6.3 mitigations include EA's requirements. Flood resistance and resilience measures could be included. Safe access and egress must be achieved.	B6.3 actions and mitigations to be implemented
SNF41	5.2	2.5	92.3	approx. 13.5		Detailed actions and mitigations set out in B6.3. Design to avoid vulnerable uses in FZ3b and/or steer to lower flood risk areas.	B6.3 actions and mitigations to be implemented

**Sourced from B6.3: Strategic Flood Risk Assessment – Level 2 (November 2025)*

***note this category includes flood zones 3a and 3b*

Conclusion

13.58.5 The Council considers that Policy SA5 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.58.6 N/A

Reason for proposed Main/Minor Modification

13.58.7 N/A

Policy SA6: Land West of Strood

13.59 How has the circa 1,280 capacity for this strategic allocation been derived (criterion 3.)?

Council's response

13.59.1 Generally, the capacities for sites were derived from a mixture of sources including the consideration of benchmarks from the 2024 Lichfields 'Start to Finish' (third edition) report, planning consents, brownfield register 2022, development briefs,

Supplementary planning documents, Local Plan 2003 (ref: B22.5, page 18). In the case of sites within Policy SA6, the agent's minimum was used as the best guide to inform realistic site capacities.

Evidence base

a. B22.5, Housing Delivery Topic Paper Appendix, page 18

Explanation

13.59.2 The most up-to-date housing trajectory is set out in the Appendix to the Housing Delivery Topic Paper (ref: B22.5). The information on site capacity in B22.5 reflects that of sites within Policy SA6 (ref: A1, pages 271 & 272).

Conclusion

13.59.3 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.60 Is the location of this strategic allocation consistent with national policy as regards encouraging modes of transport other than the motor car?

Council's response

13.60.1 Yes, the location is consistent with national policy (NPPF, paragraphs 110 and 115) in promoting sustainable patterns of growth and demonstrating a sustainably accessed site allocation. Policy SA6 seeks to prioritise accessibility, sustainability and community integration. In doing so, it seeks to fully leverage the sites' sustainable location. Criterion 7 of Policy SA6 (ref: A1, page 270) sets out the requirement to prioritise active travel, a reliable bus service and walking and cycling links. The site allocation is also located on the edge of Strood and therefore has the opportunity for sustainable connections to be made to ensure ease of access to services and facilities and connection to the wider community.

13.60.2 The site also benefits from excellent public transport links. An established and frequent bus services connect to nearby towns (Strood to Gravesend, via Higham) and stops adjacent to the site along Gravesend Road, providing ease of access for future residents and anyone else seeking to visit this location. Strood railway station also offers high-speed links into London St Pancras and connections into, Maidstone, Ramsgate and Tonbridge. The policy therefore enables a choice of travel and movement options to reduce car dependency.

13.60.3 The wider Local Plan strategy also includes the provision of a transport interchange in Strood (ref: A1, policy S20, page 145). This would provide a destination for a Bus Rapid Transit corridor connection with Hoo St Werburgh. The Council is working on the planning of the Strood Transport interchange, in collaboration with stakeholders, including Network Rail. Medway Council is also engaged specifically with Network Rail in the preparation of its draft Strood Station Travel Plan which covers topics including pedestrian, cycle, bus, taxi, and car access and wayfinding. A bus gate to the east of the site is already in place to help provide priority for bus services accessing the transport interchange.

13.60.4 This will provide the appropriate infrastructure for this site allocation to link into and encourage sustainable modes of transport and access to wider Medway and beyond. The site allocation has direct access onto the A226 (Gravesend Road), which connects to the M2 and A2 and is a key bus route corridor linking to services in the centre of Strood and rail stations. The site allocation is therefore well served by road infrastructure and has the ability to introduce rapid bus transit as well as other sustainable travel options.

Evidence base

a. A1, Medway Local Plan, page 270, page 145
b. NPPF, paragraphs 110 and 115

Explanation

13.60.5 This site allocation has a primary route (Gravesend Road) that runs through it and provides the backbone for the provision and enhancement of a bus rapid transit corridor to enable the provision of a reliable and frequent bus service (ref: A1, page 270, criterion 7b). Strategically positioned stops will ensure all residents are within a comfortable walking distance of public transport, reducing car dependency and providing connections to wider regional destinations.

13.60.6 Circulation within the proposed development must encourage the use of walking and cycling routes supported by the provision of a mobility hub (ref: A1, page 270, criterion 7a and 9a), which could include the hire of bicycles and flexible transport options for residents and visitors. A comprehensive network of pedestrian and cycle routes is required for prioritisation. It should integrate with existing networks, creating a continuous route that enhances regional connectivity while respecting community movement patterns. Connections to the National Cycle Route 177 is specifically mentioned (ref: A1, page 270, criterion 7c) and the need to connect to the wider countryside (ref: A1, page 270, criterion 7d), which will encourage walking, cycling and recreational use throughout all seasons.

Conclusion

13.60.7 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy. Policy SA6 clearly articulates the requirements to enable the provision of a choice of sustainable travel options, which place active travel at the heart of travel considerations. Coupled with the transport interchange at Strood, the ambitions for sustainable travel can be further encouraged.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.61 What ecology evidence has been used in the preparation of Policy SA6?

Council's response

13.61.1 The ecology evidence used to prepare Policy SA6 comprises the Sustainability Appraisal biodiversity framework, the Medway Landscape Character Assessment, Area-specific ecological assessments for the Hoo Peninsula marshes and estuaries and the habitats Regulations assessment evidence identifying potential recreation and air-quality effects on European sites and informing mitigation requirements within the allocation. These strands collectively explain why the Local Plan adopted a landscape-led and environmentally-led approach to SA6, incorporating green-blue infrastructure, habitat creation, biodiversity net gain and strategic mitigation measures to address impacts on internationally important ecological assets.

Evidence base

a. N/A

Explanation

13.61.2 The Sustainability Appraisal (ref: A3) identifies biodiversity protection as a core assessment objective for all site allocations. The SA Framework requires assessment of impacts on European designations, national designations, ancient woodland, priority habitats, green infrastructure etc. The SA Objective 3: Biodiversity and Geodiversity in Appendix B of the Sustainability Appraisal (ref: A3.3, page B1-B2) specifically requires site allocations to conserve and enhance designated sites, priority habitats, ecological networks and secure measurable biodiversity net gain.

13.61.3 The Medway Landscape Character Assessment (2024) (ref: B7 page 435, 437, 444 to 446) formed part of the evidence base used by the Local Plan and provides a detailed ecological baseline for Hoo Peninsula and surrounding landscapes that are relevant to Strategic Allocation SA6 (ref: A3.3, Appendix K).

13.61.4 Policy SA6 at criterion 4b and 5c make specific reference to the creation of habitats and ensuring appropriate ecological enhancements are put in place. The Council expects these issues to be addressed in the masterplan preparation and more detail when planning applications are received.

Conclusion

13.61.5 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy. The site allocation has been informed by ecological studies, which will influence how habitats are created, maintained or enhanced.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.62 What affordable housing requirement (criterion 3. c) is the policy setting for this strategic allocation?

Council's response

13.62.1 The Council is seeking Affordable Housing in accordance with the Golden Rules (ref: NPPF, page 18, paragraphs 67 to 68). Due to issues of viability, a 45% requirement was considered a reasonable requirement that would still render schemes viable. The Viability Assessment (ref: B5) at paragraph 10.22 indicates that 50% affordable housing was tested at Appendix 14. However, the Viability Assessment recommends 45%.

Evidence base

- NPPF, page 46, paragraph 156 and 157
- B5: Viability Assessment, page 167, para10.24d, Appendix 14, page 166, paragraph 10.22

Explanation

13.62.2 National policy sets out at paragraph 67 (NPPF, page 18) sets out that a higher level of affordable housing should be set for land released from Green Belt and requires at least a 50% minimum, unless it made the sites unviable.

13.62.3 These are applicable to major development involving the provision of housing on land proposed for release from the Green Belt through plan preparation. In this case, the Council's approach is demonstrating consideration of viability in informing the percentage requirement as per paragraph 68 (ref: NPPF, page 18). percentage points. The viability assessment confirms that a 45% affordable housing requirement would still render schemes in this location viable (ref: B5, page 167, para 10.24d).

13.62.4 A modification to the policy could be considered to provide clarity of the actual affordable housing percentage if the Inspectors found this helpful.

Conclusion

13.62.5 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

13.62.6 To provide clarity and effectiveness of the policy.

13.63 Why are proposals for this strategic allocation to be landscape based (criterion 4.)?

Council's response

13.63.1 In the Council's view, the site allocation requires a considered approach that is appropriate to its setting. Whilst Strood has historically grown out of its waterfront location and has a strong relationship to the river, this site allocation addresses the Kentish landscape to the north. This is therefore not an urban location but is the countryside that sits adjacent to the urban area of Strood district centre.

13.63.2 A stronger landscape-led framework is needed to draw the Kentish landscape into the proposed development incorporating key views and distinctive landscape features to shape neighbourhood identity and everyday experiences including active travel. This has been informed by the Landscape Character Assessment (ref: B7) and the Sustainability Appraisal (ref:).

13.63.3 The SA identifies that the allocation sits within an important countryside setting on the edge of Strood and close to the Kent Downs National Landscape. Although the individual sites were considered suitable for development, the Sustainability Appraisal recognised potentially adverse effects on landscape character if development was not carefully planned. As a result, the allocation policy requires a landscape-led masterplan approach rather than a conventional housing-led layout.

Evidence base

- B7: Landscape Character Assessment, page 435, 437. 444 to 446
- A3.3: Sustainability Appraisal – Volume 3 of 3, pages I107, I114, I116, K25, K29

Explanation

13.63.4 The Landscape Character Assessment identifies site allocation SA6 within character area F3 (ref: B7, page 435). It describes the undulating landscape, the small and medium scale fields, the importance of PRoW lined settlements and farmsteads that extend into Gravesham Borough and the mix of land use or orchards and

horticultural uses and remnants of traditional orchards. At page 442 it sets out the landscape evaluation, highlighting key sensitivities and values. Of particular importance is the rural character and the role views play in creating a sense of place. A Landscape strategy is et out on page 444, which comments on any proposed development in Strood should be integrated into the landscape. More specific development management guidance is provided across pages 445 to 446.

13.63.5 The Sustainability Appraisal acknowledges that the constituent sites of Strategic Allocation SA6 (SNF1, SNF3 and SR5) each have a negative effect against SA Objective 4 (Landscape and Townscape) (ref: A3.3, page I107, I114, I116). However, Appendix K (Table K.2.6, page K25) and paragraph K.2.6.8 (page K29) conclude that Policy SA6 as a whole has a neutral landscape effect because the allocation is required to be delivered through a landscape-led masterplan and green-blue infrastructure strategy. The appraisal specifically notes that development must respond to landscape character, views and the setting of the Kent Downs National Landscape. This landscape-first approach is therefore the reason why proposals for SA6 are required to be landscape-based.

13.63.6 The post mitigation landscape scores are recorded in Appendix I and summarised in Appendix K, Table K.2.6. Within Table K.2.6, (page K25), the Sustainability Appraisal notes that the component sites (SNF1, SNF3 and SR5) individually score negatively for landscape, but the policy as a whole is assessed separately because of the mitigation and design requirements built into the allocation.

Conclusion

13.63.7 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy. The landscape-led approach is considered appropriate and verified by evidence.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.64 Who will be responsible for producing the green-blue infrastructure strategy (criterion 5.) for this strategic allocation?

Council's response

13.64.1 The site promoters will be required to produce a site allocation specific Green-Blue Infrastructure strategy that would be informed by Medway's Green and Blue Infrastructure Strategy (MLP/ED37).

13.64.2 A better understanding of this location is required to inform an appropriate scheme, which includes articulating a Green-blue infrastructure strategy to respond appropriately to addressing the Golden Rules (NPPF, page 46, paragraph 156.c.) and required flood and drainage needs. The Council proposes a modification to clarify this.

Evidence base

- Green and Blue Infrastructure Strategy (MLP/ED37)
- NPPF, page 46, para 156c.

Explanation

N/A

Conclusion

13.64.3 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.64.4 Amend criterion 5 of Policy SA6 (ref: A1, page 269):

'A Green-blue infrastructure strategy **will be prepared by developers to be approved by the Council. This** will shape placemaking by supporting the Design and layout of proposals:'

Reason for proposed Main/Minor Modification

N/A

13.65 Do the specific requirements for the strategic allocation set out in Policy SA6 (in particular, criteria 6. to 11.) concern only land in Medway?

Council's response

13.65.1 No, the requirements apply across the entire site allocation covering both Medway and Gravesham. This is to ensure that the entire site allocation that straddles across two authorities comes forward in a comprehensive and considered way, ensuring the impacts on neighbouring sites are taken into account and that the entire site is appropriately addressed. Additionally, whilst this is a cross-border site now, the future Local Government reorganisation is likely to change this.

13.65.2 The Gravesham BC policy LP6 (Regulation 19 submission draft) replicates the content of the policy across criterion 6 to 11, with some additional text at criterion 8 regarding heritage.

13.65.3 Additionally, since submission of Medway's Local Plan, Gravesham BC have progressed their capacity assessment of parcels sitting in their authority. Their review, as presented in the Gravesham BC Local Plan (Regulation 19 submission draft) confirmed delivery of approximately 1,910 homes. This reduces the total capacity for

this site allocation from 'up to 4,000' (ref: A1, page 269, criterion 2) to 3,190. This also has knock on implications for infrastructure requirements. Modifications to the policy at criteria 2 and10 (ref: A1, page 270) are therefore proposed. The Council also acknowledges that the school requirements could be made clear for the Medway sites to link more effectively back to section 106 requirements as well as the Infrastructure Delivery Plan (ref: B2). It is expected that the Infrastructure Delivery Plan will be updated regularly to link in better with development and stakeholder engagement.

Evidence base

- Gravesham BC Regulation 19 Submission draft (2026)

Explanation

13.65.4 Medway Council and Gravesham BC worked collaboratively in progressing the site allocation and was carried forward through Medway's site allocation Policy, in advance of the Gravesham Regulation 19 draft being finalised. However, officers worked collaboratively in drafting the policy that mirrors one another across both Local Plans. Further assessment work in progressing the Gravesham Local Plan pointed to a reduction in capacity, which filtered through their policy LP6. Officers across both authorities continued to collaborate and agree on potential changes that may arise to the site allocation policy, which are set out below as modifications.

Conclusion

13.65.5 The Council considers that SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.65.6 Amend criterion 2 in Policy SA6 (ref: A1, page 269):

'2. Medway Council will work…. Green Belt site providing up to ~~4,000~~ **3,190** new homes, two primary schools…'

13.65.7 Amend criterion 10 in Policy SA6 (ref: A1, page 270):

'The development will provide for new education facilities in accordance with the latest IDP:

a. Two ~~two-form entry~~ primary schools **with the provision of one Two form entry Primary School on site SNF3**
b. An expansion of one-form entry to Temple Hill Primary school
c. An eight-form entry secondary school **to be located in Gravesham**. **Medway developers will make a financial contribution toward two-form entry**

13.65.8 Modifications will be required to the Infrastructure Delivery Plan (ref: B2).

Reason for proposed Main/Minor Modification

13.65.9 To ensure the policy is effective and provides clarity or requirements for developers.

13.66 Does Figure 12: Land West of Strood Concept Plan accurately show where infrastructure would be provided as regards Medway?

Council's response

13.66.1 Yes, in part, the concept plan presented the primary school at parcel SNF3. It did also consider a second all-through school (Primary and Secondary) partially straddling across to Medway parcel SNF1. This is no longer the case, and the Council propose an amendment to remove or reallocate the school.

13.66.2 There may also be a potential to provide smaller local centres at parcel SNF3 and SNF1. However, this can be confirmed through planning applications.

Evidence base

- B13: Retail and Town Centres Study (page 45, paragraph 5.48)

Explanation

13.66.3 Further assessment work undertaken collaboratively between Gravesham BC, Medway Council and developers has helped to narrow down the location of the secondary school to option from six in preparing a masterplan to support planning applications. The Councils also took the work to a Design Review Panel, to ensure the work was robust and responsive to the principles within both authorities' policies. Two locations were dismissed due to proximity to Strood Academy affecting operational needs. Three other options had constraints that would either restrict development considerably or would involve high costs in order to move infrastructure. The preferred site was determined on the process of elimination and is likely to be in Gravesham BC's administrative area.

13.66.4 Medway's retail evidence (B13: page 45, paragraph 5.48) identifies the need for a single large centre or smaller local centres. Opportunities exist for this to be explored in more detail at the planning application stage.

Conclusion

13.66.5 The Council considers that Policy SA6 is justified by proportionate evidence, positively prepared and consistent with national policy. The effectiveness of the policy can be improved any clarifying the education requirements, and by amending the concept plan.

Proposed Main/Minor Modification

13.66.6 Amend concept plan to remove/reallocate secondary school.

Reason for proposed Main/Minor Modification

13.66.7 To provide clarity and improve effectiveness of the policy.

13.67 Has the provision of such infrastructure requirements been considered when the circa site capacity has been derived under Policy SA6?

Council's response

13.67.1 Yes, it was assumed that the secondary school would be provided predominantly on Gravesham's land as set out above in question 13.66. Through further detailed assessment work undertaken by site promoters in collaboration with Gravesham BC and Medway Council officers, it is likely that the secondary school will be located on Gravesham land.

13.67.2 As the development spans two local authority areas, the effects of allocating land for education purposes are effectively balanced between the authorities, meaning there is no net impact on the level of contributions attributable to either council.

Evidence base

N/A

Explanation

13.67.3 See answers to question 13.66 above.

Conclusion

13.67.4 The Council considers that SA6 is justified by proportionate evidence, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.68 How are these infrastructure requirements justified, in respect of evidence?

Council's response

13.68.1 The Council has engaged with a number of different stakeholders in understanding the infrastructure needs arising from site allocations. This engagement documents the engagement process alongside setting out the infrastructure needs. Due to the cross-boundary nature of this site allocation, officers used the initial drafts of the IDP to engage with Gravesham and Kent County Council to refine the infrastructure requirements.

13.68.2 Both authorities have worked collaboratively in producing an education note, which clarifies the requirements and contributions across both authorities using a method and calculations supported by Kent County Council and Medway Council education department.

13.68.3 Medway's retail evidence (B13: page 45, paragraph 5.48) identifies the need for a single large centre or smaller local centres. Opportunities exist for this to be explored in more detail at the planning application stage.

Evidence base

a. B2: Infrastructure Delivery Plan
b. B13: Retail and Town Centres Study (page 45, paragraph 5.48)

Explanation

N/A

Conclusion

13.68.4 The Council considers that SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.69 What proportion of the costs for infrastructure requirements under Policy SA6 are to be met by way of section 106 agreement, as per Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6).

Council's response

13.69.1 The exact proportion of section 106 funding is not determined. Appendix F of MLP/ED6 and in the Infrastructure Delivery Plan (ref: B2, page 96-117), identifies the potential source of funding, the latter of which is set out against the list of projects in a table. Medway wide projects indicate funding from Highways England and others to be determined. The provision of schools is expected to be funded by s106 and cross border working. all costs will be met by s106 contributions.

Evidence base

N/A

Explanation

N/A

Conclusion

13.69.2 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.70 Is there an updated position as regards application dates, as per Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6)?

Council's response

13.70.1 Medway officers are in discussions with site promoters that anticipate applications to be submitted in the new year. This will be confirmed in a revised Statement of Common Ground with site promoters.

Evidence base

N/A

Explanation

N/A

Conclusion

13.70.2 The Council considers that SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.71 Who would be responsible for the delivery of the infrastructure delivery plan under the policy (criterion 14.)?

Council's response

13.71.1 It is a requirement for developers to produce these infrastructure delivery and phasing plans to assist in coordinating delivery.

Evidence base

N/A

Explanation

N/A

Conclusion

13.71.2 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.72 Are the 'other TBD' land uses that are referenced in sites SNF1 and SNF3 those which are listed under Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6) for SNF1 and SNF3 (and SR5)?

Council's response

13.72.1 No, the references in Appendix F of MLP/ED6 apply across the entire site allocation combined with Gravesham BC land. Modifications to this information can be made to clarify specific requirements for each site based on the proposed modifications set out at 13.65 as follows:

Site reference	Land uses
SNF3	Residential, 2FE Primary school and potential for a local centre
SNF1	Residential and potential for a local centre
SR5	Residential

13.72.2 Modifications are proposed for Policy SA6 within the table 'site-specific information' to provide this clarity.

Evidence base

N/A

Explanation

N/A

Conclusion

13.72.3 The Council considers that SA6 is justified by proportionate evidence, positively prepared and consistent with national policy. The effectiveness of the policy can be improved by providing clarity.

Proposed Main/Minor Modification

13.72.4 Amend text in Policy SA6 beneath 'Site-specific information' (ref: A1, page 271, row 1, column 3:

'Residential with opportunity for ~~other TBD~~ **a local centre**,'

13.72.5 Amend text in Policy SA6 beneath 'Site-specific information' (ref: A1, page 272, row 2, column 3:

'Residential, 2FE Primary School **and opportunity for** ~~Other TBD~~ **a local centre**'

Reason for proposed Main/Minor Modification

13.72.6 To provide clarity and improve effectiveness of the policy.

13.73 How did the Sustainability Appraisal (SA) (A3.1 to A3.3) consider SNF1, SNF3 and SR5, both individually and collectively? Please provide the related paragraph references in the SA.

Council's response

13.73.1 Individually, each site was assessed as a reasonable alternative against the Sustainability Appraisal (SA) Framework and subsequently reconsidered through updated Green Belt, transport, land availability and Duty to Co-operate evidence. Collectively, the sites were incorporated within the strategic Land West of Strood allocation (Policy SA6). The SA recognised significant environmental trade-offs, particularly around Green Belt release, landscape, pollution and agricultural land loss, but concluded that the combined SNF1/SNF3/SR5 allocation offered substantial housing delivery, infrastructure and cross-boundary planning benefits and could proceed with mitigation through Policy SA6 and a comprehensive masterplan.

13.73.2 The key strategic explanation for the sites' inclusion is provided at paragraph N52 of the Non-Technical Summary (ref: A3.1, page N24) and the equivalent commentary following Table 5.6 in the main SA Report (ref: A3.2, page 33).

13.73.3 The Sustainability Appraisal demonstrates that SNF1, SNF3 and SR5 were assessed as reasonable alternatives and subsequently selected for allocation within Policy SA6 (Land West of Strood).

Evidence base

a. A3.1 Sustainability Appraisal – Volume 1 of 3 – Non-technical Summary, pages N24, paragraph N52 and pages N25 to N27
b. A3.2 Sustainability Appraisal – Volume 2 of 3 – Regulation 19 Report, page 33
c. A3.3 Sustainability Appraisal – Volume 3 of 3 – Appendices, pages J2, J15, J19, I3, I10, I12, K25 to K30

Explanation

13.73.4 The Sustainability Appraisal – Volume 1 (ref: A3.1, page N25 to N27) explains reconsideration of western Strood sites and how the final strategy incorporated them.

13.73.5 Individually, Appendix J sets out the selection rationale. It records that the Council considered the sites' constraints capable of being addressed through updated Green Belt evidence, Duty to Cooperate engagement with Gravesham Borough Council, emerging public transport work, and that exceptional circumstances for Green Belt release were met (ref: A3.3, page J2, J15 and J19).

13.73.6 Appendix I (ref: A3.3, page I3, I10 and I12) considers the sites post mitigation.

13.73.7 Appendix K (ref: A3.3, page K25 to K30, Section K.2.6) assessed the allocation as a whole and confirms that, whilst the allocation generates significant negative effects through the loss of Grade 1 agricultural land, these effects are balanced against major positive effects for housing delivery, education provision, economic growth and strategic infrastructure, leading to the sites' inclusion within the preferred spatial strategy.

Conclusion

13.73.8 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.74 Where the Statement of Common Ground with National Highways (MLP/ED20) (page 17, last paragraph of bullet point 'Site Allocations') refers to where any other site allocations which are located in proximity to the M2 Junction 1 should include this improvement, does this include the SA6 allocation and how is this reflected in the policy?

Council's response

13.74.1 Yes, this comment from National Highways does include reference to the SA6 site allocation. This is not reflected in policy SA6 because the Council has undertaken a Strategic Transport Assessment, which National Highways has reviewed and confirms (ref: MLP/ED20, page 12, paragraph 2.2.14) that the primary requirement comes from other committed development and background growth. National Highways required further analysis with regard to the cumulative impacts of the Medway and Gravesham Local Plans. This is therefore noted as a matter under discussion (ref: MLP/ED20, Page

17, paragraph 2.8.2). Gravesham BC's Local Plan (regulation 19 draft) followed a few months following the submission of Medway's Local Plan.

13.74.2 In order to support the ongoing cooperation with National Highways and Gravesham BC, further modelling work has been commissioned (ref: MLP/ED20, Page 19, paragraph 4.1.6.) to explore this matter in relation to site allocation SA6. Work on this commission is ongoing but in the Council's view, has implications for Gravesham's Local Plan and not for Medway's Local Plan, i.e. National Highways confirms (ref: MLP/ED20, page 17, bullet 6) that the site allocations in Medway's Local Plan provide for 'on site' requirements largely do not identify specific off-site issues which need to be addressed, provided Policy DM15 is applied robustly. It is also noted in the Statement of Common Ground with Prescribed Bodies (ref: MLP/ED24A, page 28, paragraph 2.9.15). This ongoing discussion does not preclude the allocation of sites within site allocation Policy SA6.

Evidence base

a. MLP/ED20: Statement of Common Ground between Medway Council and National Highways, pages 17 and 19, paragraphs 2.8.2 and 4.1.6 respectively and page 17, paragraph 2.8.1 (bullet 6),
b. MLP/ED24A: Statement of Common Ground with Prescribed Bodies, page 28, paragraph 2.9.15

Explanation

N/A

Conclusion

13.74.3 The Council considers that Policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.75 Can the M2 Junction 1 accommodate the additional traffic associated with the SA6 Allocation and please provide an associated update where matters are still under discussion with National Highways, as per the Statement of Common Ground with National Highways (MLP/ED20) (paragraph 2.8.2)?

Council's response

13.75.1 Please see the Council's response to question 13.74 which sets out any updates to matters under discussion.

Evidence base

N/A

Explanation

N/A

Conclusion

13.75.2 The Council considers that policy SA6 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

Policy SA7: Capstone Valley

13.76 What evidence demonstrates that the scale of development proposed (up to 3,958 new homes) within Capstone Valley is justified having regard to the spatial development strategy and reasonable alternatives?

Council's response

13.76.1 The level of development proposed within Capstone Valley was derived through the Council's assessment of reasonable alternatives as part of the preparation of the Spatial Development Strategy. This was assessed through the Sustainability Appraisal and was subsequently refined through the plan-making process, taking account of consultation responses, updated evidence and housing delivery requirements.

Evidence base

- Sustainability Appraisal - Volume 2 of 3 - Regulation 19 Report (ref: A3.2, Table 5.4, PDF page 39)

Explanation

13.76.2 The second Regulation 18 consultation tested three reasonable alternative spatial growth options and, following Sustainability Appraisal, identified the Blended Strategy as the preferred approach because it provided the most balanced and sustainable pattern of growth across Medway.

13.76.3 At a more detailed level, the Sustainability Appraisal assessed 12 Spatial Delivery Options, including the Capstone Valley option. The Sustainability Appraisal (ref: A3.2, Table 5.4, PDF page 39) found that the Capstone Valley option performed

similarly to, or better than, many of the other Spatial Delivery Options against the sustainability objectives.

13.76.4 Following the Regulation 18 consultation, the Council reviewed its evidence base and housing supply assumptions. This included consideration of the reduced delivery expected from some strategic sites, the removal of certain site allocations, and the limited opportunities available to increase housing supply within existing urban areas.

13.76.5 The submitted allocation does not comprise the entirety of the wider Capstone Valley Spatial Delivery Option assessed through the Sustainability Appraisal. Rather, the Council selected specific sites that were considered suitable, available and achievable, whilst Darland Farm will be protected as natural and semi-natural open space in perpetuity, as per criterion 5.b.i of Policy SA7. The resulting capacity of up to 4,060 dwellings – based on the latest housing trajectory - reflects the Council's judgement, informed by the evidence base and reasonable alternatives assessment, as to the appropriate contribution that Capstone Valley should make towards meeting Medway's development needs.

Conclusion

13.76.6 The Council considers that Policy SA7 is justified because the scale of development proposed at Capstone Valley has been informed by the assessment of reasonable alternatives through the Sustainability Appraisal, consultation responses and subsequent review of the evidence base. The allocation forms part of the Spatial Development Strategy that was selected following consideration of alternative growth options and therefore contributes towards a Plan that is positively prepared, effective and consistent with national policy.

Proposed Main/Minor Modification

13.76.7 Update criterion 1 from 3,958 new homes to 4,060 new homes.

Reason for proposed Main/Minor Modification

13.76.8 To reflect the latest housing trajectory.

13.77 How were the allocated sites selected and what alternatives were considered and discounted?

Council's response

13.77.1 The Sustainability Appraisal - Volume 2 of 3 – Regulation 19 Report (ref: A3.2, Figure 5.2, PDF page 33) sets out how the reasonable alternatives were identified and appraised.

13.77.2 The Site Selection Topic Paper (ref: B22.1, paragraph 1.2) describes the relationship between the Land Availability Assessment, Sustainability Appraisal and the

site selection process. Having identified a spatial strategy, the 'Policy-on' stage of the site selection/rejection process considered whether a site would contribute to the vision, spatial development strategy and strategic objectives. Taken together, the site allocations in the MLP (ref: A1) represent the most sustainable, deliverable and therefore appropriate approach to the delivery of new development during the Plan period.

13.77.3 The reasons for selecting specific sites are set out in the Sustainability Appraisal – Volume 3 of 3 – Appendices (ref: A3.3, Appendix J, Tables J.1.1 and J.1.2, PDF pages 550-569). For ease, the reasons for selecting the site allocations under Policy SA7 are reproduced below:

Site reference	Outline reason for selection / rejection provided by Medway Council
HW3	Capable of overcoming constraints. Aligns with spatial strategy.
HW11	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
LW4	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
LW6	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
LW7	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
LW8	The development would help to deliver the vision and the strategic objectives of the new Local Plan.
LW10	The development would help to deliver the vision and the strategic objectives of the new Local Plan.

13.78 How does Policy SA7 contribute towards the housing, infrastructure and environmental objectives of the Plan?

Council's response

13.78.1 Policy SA7 makes a significant contribution towards the housing, infrastructure and environmental objectives of the Plan by delivering a substantial proportion of Medway's housing requirement within a strategic growth location whilst securing supporting infrastructure, green infrastructure and environmental enhancements as part of a comprehensively planned development.

Evidence base

- N/A

Explanation

13.78.2 Capstone Valley forms an important component of the Spatial Development Strategy and contributes substantially towards meeting Medway's identified housing needs. The allocation provides an opportunity to accommodate growth in a planned and coordinated manner whilst securing the infrastructure necessary to support new and existing communities.

13.78.3 The policy requires the delivery of a range of supporting infrastructure, including transport improvements, education provision, community facilities, green infrastructure and open space. In this way, the allocation contributes towards the Plan's infrastructure objectives by ensuring that development is accompanied by the facilities and services required to support growth.

13.78.4 The policy also contributes towards the environmental objectives of the Plan through requirements relating to landscape, green infrastructure, biodiversity, open space, sustainable movement and the relationship between development and the wider Capstone Valley landscape. The comprehensive masterplanning requirements ensure that environmental considerations are incorporated into the design and delivery of the allocation from the outset.

Conclusion

13.78.5 The Council considers that Policy SA7 is justified and effective because it makes a substantial contribution towards the housing, infrastructure and environmental objectives of the Plan whilst supporting the delivery of the wider Spatial Development Strategy. The allocation therefore forms an important component of a positively prepared and sustainable development strategy.

Proposed Main/Minor Modification

13.78.6 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.79 What evidence demonstrates that the proposed quantum and form of development can be accommodated without unacceptable harm to the landscape character of Capstone Valley?

Council's response

13.79.1 The Council considers that the landscape effects associated with the proposed quantum and form of development can be appropriately managed and mitigated through a landscape-led approach to masterplanning and design. This conclusion is informed by the Landscape Character Assessment, which identifies a landscape strategy for the Capstone Valley area and has informed the requirements of Policy SA7.

Evidence base

- Landscape Character Assessment (ref: B7, PDF pages 264 to 314)

Explanation

13.79.2 Capstone Valley broadly corresponds with the Landscape Character Type D: Dry Chalk Valleys and Downs and associated Landscape Character Areas D1 to D4 identified within the Landscape Character Assessment. The assessment provides a detailed understanding of the landscape character, sensitivities, capacity and opportunities within the area and informed the preparation of Policy SA7.

13.79.3 The Council acknowledges that development of the scale proposed will inevitably result in changes to the existing landscape. However, the Landscape Character Assessment identifies opportunities for development to be accommodated through careful planning, landscape integration and the reinforcement of landscape structure. The Council therefore considers that the key issue is not whether change will occur, but whether landscape effects can be appropriately managed and mitigated.

13.79.4 This approach is reflected in criteria 6, 7 and 12 of Policy SA7, which require development to respond positively to landscape character, green infrastructure and the wider valley setting. These requirements are intended to ensure that development is integrated with the existing landscape structure and that important landscape features, views, green corridors and ecological connections are retained, enhanced and used to structure the allocation.

13.79.5 Furthermore, criterion 12 requires the preparation of a comprehensive masterplan for the allocation. The Council considers that this provides the mechanism through which the recommendations of the Landscape Character Assessment can be translated into a landscape-led masterplan, ensuring that the cumulative effects of development are considered holistically across the allocation rather than on a site-by-site basis.

13.79.6 The Council therefore considers that the Landscape Character Assessment informed both the identification of the allocation and the development requirements contained within Policy SA7, including the measures necessary to manage and mitigate landscape effects.

Conclusion

13.79.7 The Council considers that Policy SA7 is justified and effective, having been informed by the Landscape Character Assessment and supported by requirements for landscape-led masterplanning, green infrastructure planning and comprehensive site design. Whilst the proposed development will alter the existing character of parts of Capstone Valley, the Council considers that the policy provides an appropriate framework for ensuring that landscape impacts are managed and mitigated and that the

key characteristics of the valley are conserved and reinforced through the design and delivery of development.

Proposed Main/Minor Modification

13.79.8 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.80 How have the findings of the Landscape Character Assessment (B7), Green Infrastructure evidence and Sustainability Appraisal (A3.1 to A3.3) informed the allocation?

Council's response

13.80.1 The allocation has been informed by the Landscape Character Assessment, Green Infrastructure evidence and Sustainability Appraisal, which influenced both the selection of Capstone Valley as a strategic allocation and the specific requirements contained within Policy SA7. These evidence base documents have resulted in a landscape-led approach to development, significant green infrastructure requirements and the long-term protection of key environmental assets.

Evidence base

- Landscape Character Assessment (ref: B7, PDF pages 276-279)

Explanation

13.80.2 As explained in response to questions 13.76 and 13.79, the allocation forms part of the Spatial Development Strategy that emerged from the assessment of reasonable alternatives through the Sustainability Appraisal process.

13.80.3 The Landscape Character Assessment was particularly influential in shaping the policy requirements. Capstone Valley falls within the Dry Chalk Valleys and Downs landscape character type and the Landscape Character Assessment (ref: B7, PDF pages 264 to 314) identifies the importance of conserving the valley structure, maintaining the landscape setting of the area and strengthening the green infrastructure network. These principles are reflected throughout Policy SA7.

13.80.4 One specific example is criterion 5.b.i, which requires: "Darland Farm will be protected as natural and semi-natural open space in perpetuity." The Council considers that this requirement directly responds to the landscape strategy and guidance contained within the Landscape Character Assessment (ref: B7, PDF pages 276-279) and demonstrates how the allocation has been shaped by landscape considerations. Rather than allocating the entire site for development, the policy safeguards a substantial area of open land as part of the wider green infrastructure framework and landscape setting of the valley.

13.80.5 Similarly, the Green Infrastructure evidence informed the requirements relating to green corridors, ecological connections, open space provision and landscape-led masterplanning. These measures are intended to ensure that development is integrated into a coherent green infrastructure network and that environmental assets are retained, enhanced and connected across the allocation.

Conclusion

13.80.6 The Council considers that Policy SA7 is justified and effective because it has been directly informed by the Landscape Character Assessment, Green Infrastructure evidence and Sustainability Appraisal. The resulting allocation and policy requirements reflect a landscape-led approach to growth, whereby significant environmental assets are protected and enhanced whilst enabling development to contribute towards the delivery of the Spatial Development Strategy.

Proposed Main/Minor Modification

13.80.7 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.81 Are the green infrastructure requirements sufficiently clear and deliverable?

Council's response

13.81.1 Yes. The Council considers that the green infrastructure requirements contained within criteria 5 and 6 of Policy SA7 are sufficiently clear and deliverable.

Evidence base

- N/A

Explanation

13.81.2 Policy SA7 identifies a range of specific green infrastructure requirements that must be delivered as part of the allocation. Criterion 5 safeguards key green infrastructure assets, including the protection of Darland Farm as natural and semi-natural open space in perpetuity, whilst criterion 6 requires the preparation of a Green Infrastructure Strategy to inform the overall design and layout of development.

13.81.3 The policy also provides clear direction regarding the treatment of historic landscape features, ecological corridors, multifunctional green infrastructure, sustainable drainage infrastructure, Ancient Woodland buffer strips and street tree provision. The Council considers that these requirements provide a robust framework for applicants and decision-makers whilst allowing flexibility regarding detailed design and implementation.

13.81.4 Furthermore, criterion 12 requires a comprehensive landscape-led masterplan, informed by the Green Infrastructure Strategy. The Council considers that this provides an effective mechanism for securing the coordinated delivery of green infrastructure across the allocation and ensuring that environmental, landscape and ecological objectives are integrated into the design and phasing of development.

Conclusion

13.81.5 The Council considers that Policy SA7 is justified and effective because the green infrastructure requirements are clearly articulated, informed by the Landscape Character Assessment and Green Infrastructure evidence, and supported by a requirement for a Green Infrastructure Strategy and landscape-led masterplan. The policy therefore provides a clear and deliverable framework for securing strategic green infrastructure and ecological enhancements as an integral component of the Capstone Valley allocation.

Proposed Main/Minor Modification

13.81.6 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.82 How will strategic green infrastructure and ecological corridors be secured and managed over the Plan period?

Council's response

13.82.1 The Council considers that the detailed delivery and management arrangements will be determined through the planning application process. This may include planning conditions, planning obligations, management plans, stewardship arrangements and the identification of responsible management organisations. The purpose of Policy SA7 is therefore to establish the strategic framework and spatial requirements, whilst allowing detailed implementation and management arrangements to be developed as part of future planning applications.

13.83 What transport evidence supports the allocation?

Council's response

13.83.1 The allocation is supported by the Strategic Transport Assessment and associated transport modelling work. The Capstone Valley allocations were included within the future-year modelling scenarios used to assess the cumulative transport impacts of the Plan and to identify the transport interventions necessary to support growth. The transport impacts arising from the allocation were assessed alongside the wider pattern of growth proposed by the Plan, rather than in isolation. The transport evidence identifies both strategic and local transport interventions required to support development across Medway and is addressed in detail under Matter 9.

13.83.2 In particular, the transport modelling incorporated the proposed east-west link spine road identified within criteria 1 and 8 of Policy SA7 as part of the future transport network assumptions used to assess the allocation.

13.83.3 In addition, further transport modelling was undertaken to assess an interim mitigation scheme for M2 Junction 4. This work is reported within the 'Strategic Transport Assessment - M2 Junction 4 Cost Estimate Report' (ref: B18.9) and is also reflected in the Statement of Common Ground with National Highways (ref: MLP/ED20, paragraphs 2.5.3 to 2.5.5, PDF pages 13-14). The Council considers that this additional work demonstrates that alternative and interim mitigation measures have been considered to support development should the timing of other infrastructure projects change.

13.83.4 The Council therefore considers that the transport implications of the allocation have been assessed through a proportionate and comprehensive evidence base that has informed both the allocation and the mitigation measures required to support its delivery.

13.84 Is there sufficient capacity within the local highway network to accommodate the scale of development proposed?

Council's response

13.84.1 Yes. The Council considers that there is sufficient capacity within the local highway network to accommodate the scale of development proposed at Capstone Valley, subject to the implementation of the mitigation measures identified through the Strategic Transport Assessment and subsequent junction modelling work.

13.84.2 The Capstone Valley allocation was included within the Strategic Transport Assessment and associated transport modelling scenarios used to assess the cumulative impacts of the Local Plan growth strategy. The transport evidence tested the impacts of the proposed development alongside other allocations across Medway and identified the necessary mitigation measures required to support growth.

13.84.3 The Strategic Transport Assessment concluded that the Medway network has capacity for the proposed final Reg19 LP allocations, subject to the implementation of the proposed mitigations at the key eight junctions (ref: B18.1, PDF page 158, under 10.3.1).

13.84.4 The Council therefore considers that the evidence demonstrates that the highway impacts arising from the allocation can be managed through the identified mitigation package and ongoing monitoring of network performance.

13.85 What highway mitigation measures are required and how will they be funded and delivered?

Council's response

13.85.1 The strategic highway mitigation requirements necessary to support the Local Plan growth strategy are set out within the Strategic Transport Assessment's 'Junction Modelling and Mitigation Report' (ref: B18.7). The Capstone Valley allocation was included within the transport modelling scenarios and therefore contributes to the package of strategic transport interventions identified through that work.

13.85.2 The strategic junction closest to the allocation is M2 Junction 4. As recorded in the Statement of Common Ground with National Highways (ref: MLP/ED20, paragraph 2.5.1, PDF page 13), improvements to M2 Junction 4 are intended to be delivered through the proposed Lidsing Garden Community development within the Maidstone Borough.

13.85.3 However, the Council acknowledges that the timing and delivery of infrastructure can change over the Plan period. Accordingly, the Council has already demonstrated contingency planning by commissioning an interim mitigation scheme for M2 Junction 4. The Strategic Transport Assessment (ref: B18.7, PDF page 52) concluded that this alternative scheme is operationally viable and capable of accommodating future traffic growth. The Council therefore does not consider that delivery of the Capstone Valley allocation is dependent upon a single highway intervention.

13.85.4 More generally, the Council's position is that strategic transport mitigation will be delivered through a combination of developer contributions, site-specific mitigation secured through the planning application process, infrastructure provider investment and other funding opportunities identified through the Infrastructure Delivery Plan and wider transport planning process.

13.86 What education, health, utilities and other infrastructure requirements have been identified as required and how will they be delivered?

Council's response

13.86.1 Policy SA7 identifies a range of infrastructure requirements necessary to support the allocation. In particular, criteria 1, 2 and 3 identify education infrastructure requirements. These requirements reflect the Council's assessment of the education facilities necessary to support the scale of development proposed within Capstone Valley, as set out in the Infrastructure Delivery Plan (ref: B2, Appendix 1, PDF pages 100-101).

13.86.2 Site-specific infrastructure requirements are identified within the Council's Response to the Inspectors' Initial Questions (ref: MLP/ED6, Appendix F, PDF pages 91-94).

13.86.3 With regard to utilities infrastructure, the Council's position is consistent with its response to question 10.43. The Infrastructure Delivery Plan records engagement with utility providers, including UK Power Networks, Southern Water and Southern Gas Networks. Whilst network reinforcement and investment may be required as development comes forward, utility providers have not identified any critical capacity constraints that would prevent delivery of the allocation. Infrastructure providers will continue to refine investment programmes and network improvements throughout the Plan period, informed by housing trajectories, development phasing and ongoing engagement with the Council.

13.86.4 The Council's approach to healthcare infrastructure is similarly based on ongoing engagement with NHS Kent and Medway, developer contributions and continued infrastructure planning through the Infrastructure Delivery Plan, Strategic Infrastructure Group and development management process.

13.86.5 The Council considers that there is a reasonable and proportionate basis for concluding that the necessary infrastructure can be delivered alongside development through a combination of developer contributions, infrastructure provider investment and other funding mechanisms.

13.87 Have cumulative impacts with other allocations been fully assessed?

Council's response

13.87.1 The Capstone Valley allocation was not assessed in isolation. Rather, it was considered as part of the overall growth proposed by the Local Plan. The Strategic Transport Assessment assessed the cumulative transport impacts arising from all proposed allocations and identified the mitigation measures necessary to support the Plan-wide development strategy.

13.87.2 Similarly, the Infrastructure Delivery Plan was prepared having regard to the cumulative infrastructure demands arising from the overall scale and distribution of development proposed by the Plan. In preparing the Infrastructure Delivery Plan, the Council shared its housing trajectory and development assumptions with internal Council departments, including Education Planning, together with external infrastructure providers and utility companies. This enabled infrastructure requirements to be assessed having regard to the combined effects of planned growth across Medway rather than the impacts of individual allocations alone.

13.88 How will infrastructure provision relating to Policy SA7 be phased alongside development?

Council's response

13.88.1 The Council considers that infrastructure provision will be phased alongside development through the Infrastructure Delivery Plan (IDP), the development

management process and the site-wide masterplanning requirements of Policy SA7. However, the Council acknowledges that greater clarity is required regarding the relationship between development delivery, infrastructure provision and infrastructure triggers.

Evidence base

- N/A

Explanation

13.88.2 The infrastructure requirements associated with Policy SA7 have been identified through the Infrastructure Delivery Plan, Infrastructure Delivery Schedule and supporting evidence base. The Council's housing trajectory and delivery assumptions reflect the need for infrastructure to be provided alongside development and have informed the expected phasing of the allocation.

13.88.3 As set out in the Council's response to Question 10.40, the Council recognises that the submitted Plan does not identify detailed infrastructure triggers, occupation thresholds or delivery milestones for this allocation. The Council considers that site allocation policies provide the most appropriate location for establishing the framework for infrastructure phasing because they can respond directly to the circumstances, constraints and infrastructure requirements of individual growth locations.

13.88.4 Accordingly, the Council considers that Policy SA7 would benefit from a requirement for a site-wide Infrastructure Delivery and Phasing Plan to be prepared as part of the comprehensive masterplanning process. This would provide a mechanism for coordinating development phases with infrastructure delivery throughout the allocation and would be informed by the Infrastructure Delivery Plan.

Conclusion

13.88.5 The Council considers that Policy SA7 is justified, as the infrastructure necessary to support the allocation has been identified through the evidence base. However, the Council acknowledges that the policy would be more effective if it contained greater clarity regarding infrastructure phasing and delivery triggers. The Council therefore supports further work to establish an agreed phasing framework for the allocation.

Proposed Main/Minor Modification

13.88.6 Amend Policy SA7 to require a site-wide Infrastructure Delivery and Phasing Plan, informed by the Infrastructure Delivery Plan and agreed as part of the comprehensive masterplanning process.

Reason for proposed Main/Minor Modification

13.88.7 The modification is necessary to improve the effectiveness of the policy by providing a clearer relationship between development delivery, infrastructure provision

and delivery triggers. It would also be consistent with the Council's position that detailed infrastructure phasing is most appropriately addressed through site allocation policies, where it can respond directly to the specific circumstances of strategic growth locations.

13.89 Are there any significant viability, land ownership or deliverability constraints?

Council's response

13.89.1 No. The Council has not identified any significant viability, land ownership or deliverability constraints that would prevent the delivery of the Capstone Valley allocation. The majority of the allocation is within single ownership and the Council considers that appropriate mechanisms exist to secure the infrastructure necessary to support development.

Evidence base

- N/A

Explanation

13.89.2 The Council's evidence indicates that the Capstone Valley allocation is predominantly within the ownership of F T Atwood and Partners, which assists the comprehensive planning and delivery of the site. The Council has not identified any abnormal land ownership constraints that would prevent implementation of the allocation.

13.89.3 The Council's Viability Assessment did not identify any significant viability constraints that would undermine delivery of the allocation. Whilst infrastructure requirements are substantial, these have been reflected in the Plan's evidence base and infrastructure planning work.

13.89.4 The Council notes, however, that delivery of a new 6-8FE secondary school is identified as critical infrastructure required in the earlier stages of the Plan period. Criterion 3 of Policy SA7 requires Abbotts Court Farm (HW3) to provide 10 hectares of land for a new secondary school. Paragraph 14.8.6 of the Plan explains that Abbotts Court Farm is in Council ownership and represents the preferred location for the school, subject to appropriate arrangements regarding the loss of development value.

13.89.5 The Council therefore considers that, whilst the secondary school is a key dependency for the allocation, the land required to facilitate its delivery has already been identified and safeguarded through Policy SA7. The Council is not aware of any evidence demonstrating that this requirement would prevent delivery of the wider allocation.

Conclusion

13.89.6 The Council considers that Policy SA7 is justified and effective. The allocation is not subject to any significant viability, land ownership or deliverability constraints that would prevent development from coming forward within the Plan period. Whilst the delivery of a new secondary school is an important infrastructure requirement, the necessary land has been identified within the allocation and appropriate mechanisms exist to secure its delivery alongside development.

Proposed Main/Minor Modification

13.89.7 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.90 Are the site-specific allocations within Policy SA7 deliverable within the anticipated timescales set out in the housing trajectory?

Council's response

13.90.1 The Council considers that the component allocations are capable of being delivered. The housing trajectory is agreed in the Statement of Common Ground with F D Attwood and Partners (ref: MLP/ED24C, paragraph 2.1.1).

13.91 Is Policy SA7 overall positively prepared, justified, effective and consistent with national policy?

Council's response

13.91.1 Yes. The Council considers that Policy SA7 is positively prepared, justified, effective and consistent with national policy.

Evidence base

- N/A

Explanation

13.91.2 As set out in the Council's responses to Questions 13.76 to 13.90, the allocation forms a key component of the Spatial Development Strategy and was identified through the assessment of reasonable alternatives, Sustainability Appraisal, site assessment work and supporting evidence. The allocation makes a significant contribution towards meeting Medway's development needs whilst securing supporting infrastructure, green infrastructure and environmental enhancements.

13.91.3 The policy has been informed by the Landscape Character Assessment, Green Infrastructure evidence, Strategic Transport Assessment, Infrastructure Delivery Plan and other supporting evidence. It contains requirements relating to landscape-led masterplanning, transport infrastructure, education provision, green infrastructure,

biodiversity, heritage and comprehensive planning across the allocation. The Council considers that these requirements provide an appropriate framework for managing the impacts of development whilst enabling the site to contribute towards the delivery of the Plan's housing and infrastructure objectives.

13.91.4 The Council acknowledges that there is scope to improve the effectiveness of the policy through greater clarity regarding infrastructure phasing and delivery triggers, as discussed in response to Question 13.88.

Conclusion

13.91.5 The Council considers that Policy SA7 is:

- Positively prepared, as it contributes significantly towards meeting Medway's identified housing and infrastructure needs;
- Justified, as it is supported by a proportionate evidence base and has been considered through the assessment of reasonable alternatives;
- Effective, as the allocation is deliverable and supported by infrastructure planning, comprehensive masterplanning and identified mitigation measures; and
- Consistent with national policy, as it promotes sustainable development whilst requiring appropriate consideration of landscape, heritage, biodiversity, transport and infrastructure matters.

Proposed Main/Minor Modification

13.91.6 Amend Policy SA7 to require a site-wide Infrastructure Delivery and Phasing Plan, informed by the Infrastructure Delivery Plan and agreed as part of the comprehensive masterplanning process.

Reason for proposed Main/Minor Modification

13.91.7 The modification is necessary to improve the effectiveness of Policy SA7 by providing greater clarity regarding infrastructure delivery, phasing and implementation arrangements throughout the Plan period.

Policy SA8: Hoo St Werburgh and Chattenden

13.92 What is the justification for directing a significant proportion of growth (circa. 4,700 new homes) to Hoo St Werburgh and Chattenden?

Council's response

13.92.1 The proposed scale of development has been informed by a comprehensive site assessment process, including Sustainability Appraisal, taking account of environmental constraints, infrastructure capacity, deliverability considerations, and the need to make an effective contribution to meeting housing needs and deliver the strategic objectives of the Plan.

Evidence base

- Sustainability Appraisal (A3.1-A3.3)
- Land Availability Assessment (B1)

Explanation

13.92.2 The strategic allocation for significant growth at Hoo and Chattenden forms an important component of the preferred spatial strategy which has been defined through the Sustainability Appraisal (A3.2 see chapters 5 and 6, from page 31). The blended spatial strategy provides for a mix of development types in urban, suburban and rural locations.

13.92.3 The Land Availability Assessment (B1) and Sustainability Appraisal (A3) demonstrated that it was not possible to meet the scale and mix of development needs through urban regeneration sites alone, and greenfield sites in suburban and rural locations were required in the growth strategy.

13.92.4 Hoo St Werburgh is a large village, serving smaller villages on the peninsula, but with the potential for improved services. The Council considers that the focused growth at Hoo and Chattenden provides the basis for a strengthened role for Hoo and the sustainability of the rural communities.

13.92.5 The allocation makes a significant contribution towards meeting housing needs and assists in maintaining a flexible supply of deliverable and developable sites throughout the plan period. Given the scale of the identified housing need, larger strategic sites such as this are an important component of the overall housing land supply strategy and help to reduce reliance on a greater number of smaller allocations.

Conclusion

13.92.6 The Council considers that the proposed allocation is justified by the Sustainability Appraisal and evidence base for the Plan, is effective in delivering sustainable development, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.93 How does the allocation accord with the Plan's settlement hierarchy and spatial development strategy?

Council's response

13.93.1 The allocation is a key component of the spatial development strategy, which provides for a mix of development types in urban, suburban and rural locations.

The focus of significant development in Hoo St Werburgh directs growth to a large village, which can provide for sustainable growth, with the mitigations and provisions identified in the Plan.

Evidence base

- Sustainability Appraisal (A3)
- Village Infrastructure Audit (B3
- Medway Town Centre Retail & Town Centres Study (B13, see section 5, pages 45-47)

Explanation

13.93.2 Medway's settlement pattern is made up of the urban communities in the historic towns and smaller villages, largely on the Hoo Peninsula and Medway Valley. The spatial development strategy defined through the Sustainability Appraisal (A3) has firstly considered urban regeneration, then suburban expansion, and rural development. Development in rural locations contributes to meeting needs and broadening housing choice, as well as meeting the wider strategic objectives of the plan.

13.93.3 Hoo is a large rural community. The population of Hoo St Werburgh and Chattenden was 13,782 in 2021. The parish has some higher level services, such as a secondary school, sports centre and health facilities that serve the wider peninsula. There is also an important employment base at Kingsnorth. However, the service base is limited in some aspects, such as retail, and many residents travel off the peninsula.

13.93.4 As the largest settlement on the peninsula, it is best placed to accommodate strategic growth and support enhanced service provision in the rural area. The focused growth provides a critical mass of development necessary to secure investment in infrastructure that would benefit both new and existing residents. The strategy also recognises the scale of the Kingsnorth employment area and opportunity for better integration of housing and employment growth. The Policy supports the retention of the distinct identities of Hoo and Chattenden as rural communities in contrast to the larger urban conurbation.

Conclusion

13.93.5 The Council considers that the allocation at Hoo and Chattenden is justified by proportionate evidence in plan preparation, and that it makes an effective contribution to the spatial development strategy in delivering sustainable growth.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.94 What reasonable alternatives were considered and why were they discounted?

Council's response

13.94.1 The Council considered reasonable alternatives to broad locations, typologies and scales of growth in the Sustainability Appraisal (SA)(A3.1-A3.3). The options included intensification in urban areas and more dispersed growth across smaller villages. The preferred development strategy was defined through the SA (A3) and included a focus of growth around the large village of Hoo St Werburgh, with supporting investment in infrastructure.

Evidence base

- Sustainability Appraisal (A3.2, chapter 5, pages 31- 46)

Explanation

13.94.2 The SA considered a broad range of reasonable alternatives. The approach to reasonable alternatives is set out in the SA (A3.2) at Figure 5.1, page 32, and Figure 5.2, page 33.

13.94.3 The Regulation 18 2024 consultation (C2.1) considered different options to meet growth needs, including three defined Spatial Growth Options (C2.1, section 3, pages 28-30). An urban focus option directed higher levels of development to regeneration areas, and a dispersed strategy option had higher levels of development in suburban and rural locations.

13.94.4 Options considered included development in smaller villages, such as Allhallows. The selected spatial strategy in the submission Plan (A1) reduced development in more remote locations, in preference to consolidated growth around Hoo, with the inclusion of site HHH31, to enhance sustainability, with access to services and employment, and delivering the critical mass to secure additional infrastructure.

Conclusion

13.94.5 The Council's view is that it appropriately considered reasonable alternatives and that the spatial strategy and allocations were informed by the Sustainability Appraisal, and wider proportionate evidence.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.95 What evidence demonstrates that the transport network can accommodate the scale of development proposed?

Council's response

13.95.1 The Strategic Transport Assessment (Ref B18.1 to B18.12) considered the growth proposed in the Plan and identified mitigations to accommodate the scale of planned development on the Hoo Peninsula. Please also see the Council's response to Questions 9.1 and 9.2 in Matter 9 Hearing Statement.

Evidence base

- Strategic Transport Assessment (B18.1 to B18.12)
- Infrastructure Delivery Plan (B2)

Explanation

13.95.2 The Strategic Transport Assessment (B18.1 to B18.12) identified the impact of planned growth over the plan period. This identified capacity constraints on parts of the highway network connecting the Hoo Peninsula. Further work on the STA identified mitigations required to support sustainable development, including highway junction improvements, modal shift and reducing the need to travel through improved services. The requirements for transport improvements have been identified in the Plan. The STA demonstrates that the transport strategy can facilitate and accommodate the scale and distribution of development.

13.95.3 The Plan includes a vision led approach (A1, page 163) to identify transport solutions. The transport solutions including junction improvements are based upon the evidence in the STA. The Plan promotes higher levels of sustainable transport, such as walking and cycling for local trips, and an enhanced bus service. The spatial strategy seeks to realise higher levels of self-containment on the Hoo Peninsula, reducing the need to travel to access services, and a higher modal share of sustainable transport. Criteria to secure the required transport mitigations are set out in the Policy criteria 13 to 15.

13.95.4 The conclusion of the STA is that the strategy will facilitate the scale and distribution of development.

13.95.5 Further detail is set out in the Council's response to Questions 9.1 and 9.2 in the Matter 9 Hearing Statement.

Conclusion

13.95.6 The Council considers that the Plan's vision led transport approach and the evidence base work in the Strategic Transport Assessment demonstrate that the transport network can accommodate the scale of development proposed.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.96A What are the key transport infrastructure requirements for Policy SA8?

Council's response

13.96A.1 Policy SA8 sets out key transport infrastructure requirements in Criteria 13 – 15. These are further detailed in the Strategic Transport Assessment (B18) and Infrastructure Delivery Plan (B2).

13.96A.2 Please also see the Council's response to Question 9.3 in Matter 9 Hearing Statement.

Evidence base

- Statement of Common Ground – National Highways and Medway Council (MLP/ED20, page 17)
- Duty to Cooperate Statement (ref: A11)
- Infrastructure Delivery Plan (ref: B2)
- Strategic Transport Assessment – Mode Share Strategy (Stage 3) (ref: B18.3)
- Strategic Transport Assessment – Merge and Diverge Assessment (ref: B18.4)
- Strategic Transport Assessment – M2 Junction Analysis Technical Note (ref: B18.5)
- Strategic Transport Assessment – Junction Modelling and Mitigation Report (ref: B18.7)

Explanation

13.96A.3 The STA identified mitigations required to address impacts on transport networks associated with planned growth and to provide for sustainable development. The growth promoted in Policy SA8 requires mitigations at key junctions on the highways network:

- Four Elms roundabout
- Main Road Hoo, junction with A228
- Dux Court Road/Bells Lane junction with A228
- Ropers Lane junction with A228

13.96A. 4 Indicative mitigation schemes for highway junctions have been identified and assessed. There are further requirements for sustainable transport, particularly enhancement of bus services (Criterion 14) and active travel (Criterion 13).

13.96A.5 Further detail is provided in the Council's response to Question 9.3 in Matter 9 Hearing Statement.

13.96A.6 There is ongoing discussion with National Highways as noted in the Statement of Common Ground with the Council (MLP/ED20, page 17) in relation to the M2 Junction 1 eastbound merge.

Conclusion

13.96A.7 The Council considers that the key transport requirements are identified and provide effective mitigation to accommodate planned growth.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.96B What are the key dependencies for delivery of transport improvements and are they funded and committed?

Council's response

13.96B.1 The STA (B18) has identified where and when key transport improvements are required to accommodate growth. The IDP (B2) identifies the funding position, showing contributions required from developers.

Evidence base

- Strategic Transport Assessment (B18
- Infrastructure Delivery Plan (B2)

Explanation

13.96B.2 The STA (B18) has identified the need for transport improvements and triggers for implementation. Given the existing limited capacity at key junctions, such as Four Elms roundabout, mitigations are required to accommodate planned growth. The technical note MLP/ED38 outlines the impacts and the proposed mitigation strategy. The STA work provides evidence on the level of development that can be accommodated through existing infrastructure, and triggers for the delivery of enhancements. This includes an interim scheme at Four Elms, in advance of a wider scheme later in the plan period.

13.96B.3 The IDP (B2) sets out anticipated funding sources, including developer contributions. The Four Elms interim scheme benefits from agreed developer contributions from the MedwayOne consented strategic employment scheme.

13.96B.4 Developer contributions towards transport costs have been considered in the Local Plan Viability Assessment (B5). The Council anticipates securing additional external funding over the plan period for strategic transport improvements.

Conclusion

13.96B.5 The Council considers that the evidence for the Plan identifies the key transport improvements needed to accommodate growth, and provides an appropriate approach to securing funding for delivery.

Proposed Main/Minor Modification

13.96B.6 Amendment to content of table on numbers of units during plan period and phases to align with the updated proposed stepped housing requirement

Reason for proposed Main/Minor Modification

13.96B.7 For consistency across Plan

13.97 Have National Highways and public transport providers confirmed that the proposed mitigation is sufficient?

Council's response

13.97.1 Yes. National Highways' position on the proposed mitigation is set out in the agreed Statement of Common Ground (MLP/ED20). The allocation is not dependent on rail services, and in engagement with bus operators, there is support for increased services for the Hoo Peninsula.

Evidence base

- Statement of Common Ground with National Highways, August 2026 (MLP/ED20)

Explanation

13.97.2 The Council has worked with National Highways throughout the preparation of the Plan and the Statement of Common Ground (MLP/ED20) evidences the outcomes of discussions. National Highways is content that the STA, subject to some continued joint working to evolve, finalise and agree all aspects (particularly concerning M2 junctions 1, 3 and 4) provides appropriate, proportionate evidence of how the methodology and assumptions applied to the Regulation 19 modelling and associated assessments have been developed and, in principle, agreed.

13.97.3 The identified transport mitigations do not require rail improvements, but the Policy provides for safeguarding land east of Hoo for future potential passenger rail services. This is supported by Network Rail (Regulation 19 representation ref E164/SLDP 973, File U). The Council has engaged with bus operators throughout the preparation of the Plan and holds regular Bus Operator network meetings. The operators support enhanced services for the Hoo Peninsula.

Conclusion

13.97.4 The Council considers that it has the agreement of National Highways to the transport proposals in the Plan, and the wider support for enhanced public transport from operators.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.98 What are the consequences to the delivery of SA8 if key transport infrastructure is delayed or does not come forward?

Council's response

13.98.1 The Council has considered contingency measures, including interim solutions to phase infrastructure, and suppressing travel demand for particular means of transport (e.g. by private car) to support the delivery of growth. Please see the Council's response to Question 9.5 in Matter 9 Hearing Statement.

Evidence base

- Strategic Transport Assessment (B18
- Technical Memorandum – Justification for a Stepped Housing Requirement – (MLP/ED38)

Explanation

13.98.2 Policies DM15 and DM18 provide mechanisms to identify details of transport mitigations at planning application stage, and to monitor the impact.

13.98.3 Development on the Hoo Peninsula will be required to adhere to an area-wide travel plan as recommended in the STA. This allows for a cumulative assessment of transport impacts and delivery of a comprehensive scheme.

13.98.4 MLP/ED38 sets out the case for a stepped trajectory for development on the Hoo Peninsula, to support the delivery of growth with phased transport infrastructure. This reduces the dependency on a single strategic transport scheme.

13.98.5 Please also refer to the Council's response to Question 9.5 in Matter 9 Hearing Statement.

Conclusion

13.98.6 The Council considers that the Plan provides flexibility in transport solutions to support the delivery of SA8.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.99 How have impacts on internationally and nationally designated ecological sites been assessed?

Council's response

13.99. 1 The plan preparation included consideration of potential impacts on internationally and nationally designated ecological sites, specifically in the Sustainability Appraisal (A3), Habitats Regulations Assessment (A4), and in the Land Availability Assessment (B1).

Evidence base

- Sustainability Appraisal (A3.1 to A3.3)
- Habitats Regulations Assessment (A4.1 to A4.3)
- Hoo Peninsula Strategic Environmental Programme Topic Paper (B22.2)
- Land Availability Assessment (B1)

Explanation

13.99.2 The Hoo Peninsula includes designated areas of international and national importance for nature.

13.99.3 The SA included an objective to Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of Medway. The methodology is set out at A3.2 chapter 4, from page 24. A3.2 Chapter 8 (from page 67) considers biodiversity, flora and fauna. Table 8.1 (A3.2 page 73) sets out a summary of the identified effects of the Plan on biodiversity, flora and fauna. The SA identifies the designated international and national sites in the baseline at A3.2 Chapter 8.1, from page 67. All policies and sites have been assessed against the SA Objectives criteria framework.

13.99.4 The methodology for HRA is set out in A4.1 Chapter 2 (from page 15). The HRA (A4.1, paragraph 3.4, from page 22, identified the European sites considered to be within the scope of influence of the Plan. The HRA carried out appropriate assessments of air quality, water quality and quantity, recreational pressure and urbanisation. Policy SA8 was screened into the assessments (A4.1, page 152). Sites in Policy SA8 were considered in the assessment (A4.1, from page 191), and in Table F.1 Review of urbanisation effects – Chattenden and Hoo St Werburgh Allocations (A4.1 from page 292).

13.99.5 The Land Availability Assessment included criteria on ecological designations in the consideration of natural constraints.

13.99.6 The Council has also considered additional work that was carried out through a Hoo Peninsula Cumulative Ecological Assessment, and Nightingale Impact Assessment on the potential impacts on designated nature sites. These are published in the Hoo Peninsula Strategic Environmental Programme Topic Paper (B22.2). In agreement with Natural England, further work is currently underway, in reviewing these assessments to confirm details of the Hoo Peninsula Strategic Environmental Programme.

Conclusion

13.99.7 The Council considers that there is an appropriate and proportionate evidence base for the Plan that has assessed the impacts on internationally and nationally designated sites.

Proposed Main/Minor Modification

13.99.8 There is potential for a modification to Criterion 19 of the Policy to reflect proposed modifications to Policies S2 and S3, and the updated position on the Hoo Peninsula Strategic Environmental Programme.

Reason for proposed Main/Minor Modification

13.99.9 To reflect updated information and the advice of Natural England

13.100 What mitigation measures are necessary in respect of recreation pressure, air quality and wider ecological impacts?

Council's response

13.100.1 The SA and HRA identified mitigation measures to address recreational pressure and wider ecological impacts. These include the Bird Wise North Kent Strategic Access Management and Monitoring Scheme, and the bespoke measures in the Hoo Peninsula Strategic Environmental Management Scheme.

Evidence base

- Sustainability Appraisal (A3.1 to A3.3)
- Habitats Regulations Assessment (A4.1 to A4.3)
- Hoo Peninsula Strategic Environmental Programme Topic Paper (B22.2)

Explanation

13.100.2 The SA and HRA have considered the potential for impacts on ecology arising from the Plan. The assessments have considered the mitigation provided by Plan policies – see A3.1, Table 8.1, page 74-76.

13.100.3 The SA and HRA have identified the requirements for mitigation to address recreational pressure. The Bird Wise North Kent Strategic Access Management and Monitoring Scheme, and the bespoke measures in the Hoo Peninsula Strategic Environmental Programme are identified as appropriate mitigations. Details are set out

in Hoo Peninsula Strategic Environmental Programme Topic Paper (B22.2), the Council's Hearing Statement for Matter 6, and in MLP/ED24A in section 2.6.

13.100.4 The HRA (A4.1, paragraph 5.2.3) states in relation to air quality: ..'it can be concluded that there will be no AIOSI at the Thames Estuary and Marshes SPA and Ramsar or Medway Estuary and Marshes SPA and Ramsar as a direct result of elevated N-dep from the MLP, either alone or in combination'.

13.100.5 The HRA (A4.1, paragraph 6.2.20) states in relation to water quality, and at paragraph 6.2.30 on water quantity, taking account of Plan policies, such as DM1 and the higher level water planning framework and licensing process : 'It can therefore be concluded that there will be no AIOSI of the North Kent Marshes, either alone or in-combination, due to a change in water quantity as a result of the MLP.'

Conclusion

13.100.6 The Council considers that effective mitigation measures have been identified through the evidence base and will be secured through Policy requirements.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.101 Is there sufficient certainty that these mitigation measures can be secured?

Council's response

13.101.1 Yes, the key mitigation measures are to be delivered through established programmes and projects led by the Council. The measures have been considered in the Viability Assessment supporting the Plan.

Evidence base

- Sustainability Appraisal (A3.1 to A3.3)
- Habitats Regulations Assessment (A4.1 to A4.3)
- Hoo Peninsula Strategic Environmental Programme Topic Paper (B22.2)

Explanation

13.101.2 The key mitigation measures are to be delivered through established programmes and projects led by the Council. Bird Wise North Kent Strategic Access Management and Monitoring Scheme is well established and secures funding from development which delivers the programme of environmental and education measures.

13.101.3 The project plan for the Hoo Peninsula Strategic Environmental Management Scheme is in preparation. The work involves consultation with both

environmental bodies and developers on the Hoo Peninsula. Key projects in the scheme include Deangate Community Parkland. This is a Council led project nearing the completion of Phase 1. The Council has the support of landowners on the Hoo Wetlands and Cockham Community Parkland projects and is working in partnership to secure additional funding to implement, alongside developer contributions.

Conclusion

13.101.4 The Council considers that there is sufficient certainty to secure these mitigations, reflecting the role of the Council in key projects, and support from landowners and wider stakeholders.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.102 What evidence demonstrates that water resources and wastewater infrastructure can support the scale of development proposed?

Council's response

13.102.1 See the Council's response to Question 10.43 in Matter 10 Hearing Statement.

13.103 What assessment has been undertaken of the impact of development on the historic environment, including Chattenden Conservation Area, listed buildings and archaeological interests?

Council's response

13.103.1 The preparation of the plan included assessment of the impacts of development on a range of considerations, including heritage. These were intrinsic to the SA (A3) and LAA (B1), and drew on wider evidence, such as the Heritage Asset Review (B9).

Evidence base

- Sustainability Appraisal (A3
- Land Availability Assessment (B1)
- Heritage Asset Review (B9
- Landscape Character Assessment (B7

Explanation

13.103.2 The LAA (B1) considers built constraints, including conservation areas, listed buildings and archaeological interests for all sites assessed for the Plan. It is to be noted that there is no Conservation Area in Chattenden; the nearest is in Upper Upnor, which is separated by the ridgeline.

13.103.3 The SA (A3.3) considered the impacts of the individual sites that form the allocation in Policy SA8 and the impacts of the Policy (page 609) on Cultural Heritage.

13.103.4 The Medway Heritage Asset Review 2025 (B9) has informed the Plan. B9 also refers to the Historic England Hoo Historic Landscape Project which includes character area assessments for many of the historic settlements on the peninsula.

13.103.5 The Landscape Character Assessment (B7) considers heritage assets in the assessments of the landscape character areas surrounding Hoo St Werburgh and Chattenden.

13.103.6 There is significant military heritage in Hoo and Chattenden and Criterion 18 of the Policy requires development to have reference to the historic environment.

Conclusion

13.103.7 The Council considers that the Policy has been informed by proportionate evidence assessing the potential impacts on heritage assets.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.104 What evidence demonstrates that the allocation is achievable and viable?

Council's response

13.104.1 The Land Availability Assessment (LAA) (B1) considered if sites are achievable. Sites were also reviewed through the Viability Assessment. There is strong market interest in bringing forward sites. Developers in their representations on the Plan have confirmed their support for the allocations.

Evidence base

- Land Availability Assessment (B1
- Viability Assessment (B5)
- Statement of Common Ground – Medway Council and Hoo Consortium (MLP/ED24B)
- Representations from developers at Regulation 18 and 19

Explanation

13.104.2 The LAA (B1) considered if sites are achievable, assessing any constraints to development, confirming land ownership, market interest and timescale for delivery. This information was collated in conjunction with land owners and agents.

13.104.3 The Viability Assessment (B5, Chapter 12) considered the strategic site of Chattenden and Hoo St Werburgh and concluded at 12.53 c that this location derives a residual value that exceeds the BLV with 30% affordable housing.

13.104.4 Developers have agreed (in principle) the housing trajectory in MLP/ED24B (at 2.1.1).

Conclusion

13.104.5 The Council considers that there is sufficient and proportionate evidence to demonstrate that the allocation is achievable and viable.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.105 What are the principal risks to delivery and how have they been addressed?

Council's response

13.105.1 The Council recognises that the development of strategic sites is complex, and an overarching framework to guide growth is critical. The Council will use a strategic masterplan and engagement with developers to manage growth.

Evidence base

- Housing Delivery Topic Paper (B22.5)
- Updated proposed stepped housing requirement supply (MLP/ED31)

Explanation

13.105.2 The Council will seek to manage the risks of delivering a large strategic allocation into the 2040s through use of a strategic masterplan to realise the ambitions for sustainable development, incorporating effective green infrastructure, transport networks and improved services and infrastructure.

13.105.3 The Policy criteria 5, 6 and 7 set out requirements to manage the delivery of growth, including a mix of housing types. The wide range of housing will assist in avoiding market saturation of similar products. Criterion 4 of the Policy states that development will provide for distinctive neighbourhoods, which seeks to differentiate the offer.

13.105.4 The Council has worked with a consortium of developers and landowners in planning development in Hoo and Chattenden. Given the scale of the development allocation, there are a limited number of landowners, so land assembly is not a major risk, and this supports collaboration in coordinating the planning and build out of development.

13.105.5 The development will require significant infrastructure investments. Through the Infrastructure Delivery Plan (B2), the Council has identified the requirements in development phases. The Council will regularly review the IDP and engage with developers, service providers and wider stakeholders to update planning and define triggers for implementation.

13.105.6 The scale of infrastructure investment will require significant funding. In addition to developer contributions, the Council will seek to secure additional funding through working in partnership, external funding and market investment.

13.105.7 The Council's Strategic Infrastructure Planning Group will have corporate oversight of the implementation of development sites to assist in the planning and coordination of key services, including education, leisure and green spaces. Criterion 12 of the Policy requires developers to work with the Council in the delivery of an Infrastructure Plan for Hoo and Chattenden.

Conclusion

13.105.8 The Council considers that the Policy provides measures to help address the potential risks to the delivery of a strategic development allocation.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.106 How will the comprehensive development of the area be secured?

Council's response

13.106.1 The Council will work with developers on a strategic masterplan to coordinate growth, and set up governance structures to plan and monitor implementation.

Explanation

13.106.2 The Policy criteria require development to come forward in accordance with a strategic masterplan. The Council will work with developers and stakeholders on a strategic framework to guide development. This will build on earlier work on a Hoo Development Framework which has informed the Policy approach.

13.106.3 The Council will establish governance and coordination arrangements to secure effective planning on strategic matters and support effective communication.

Conclusion

The Council considers that this approach will secure the comprehensive development

Proposed Minor Modification

Deletion of repeated England in criterion 18 and number correction under Subsequent design principles

Reason for proposed Main/Minor Modification

Correction of minor errors

Policy SA9: High Halstow

13.107 What is the justification for the scale of development (up to 820 new homes) proposed at High Halstow?

Council's response

13.107.1 The development allocation contributes to the preferred spatial strategy which has been defined through the plan preparation process, including the Sustainability Appraisal (A3.1-A3.3) and Land Availability Assessment (B1). The evidence base has been used to identify how the location can meet development needs, and the mitigations required to achieve sustainable development.

Evidence base

- Local Plan Sustainability Appraisal, A3.1-A3.3
- Habitats Regulations Assessment, A4.1
- Land Availability Assessment, B1
- Infrastructure Delivery Plan, B2
- Village Infrastructure Audit, B3
- Viability Assessment, B5
- Landscape Character Assessment, B7
- Local Housing Needs Assessment, B10

Explanation

13.107.2 The allocation for growth at High Halstow is part of the preferred spatial strategy which has been defined through the Sustainability Appraisal (A3.2 see chapters 5 and 6, from page 31). The blended spatial strategy provides for a mix of development types in urban, suburban and rural locations.

13.107.3 The Land Availability Assessment (B1) and Sustainability Appraisal (A3) demonstrated that it was not possible to meet the scale and mix of development needs

through urban regeneration sites alone, and greenfield sites in suburban and rural locations were required in the growth strategy.

13.107.4 The proposed scale of development has been informed by a comprehensive site assessment process, taking account of environmental constraints, infrastructure capacity, deliverability considerations, and the need to make an effective contribution to meeting housing needs.

Conclusion

13.107.5 The Council considers that the proposed allocation is justified by the Sustainability Appraisal and evidence base for the Plan, is effective in delivering sustainable development, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.108 How does the allocation support the overall spatial development strategy and the role of High Halstow within it?

Council's response

13.108.1 The allocation contributes to the preferred spatial development strategy which provides for a blend of urban regeneration, suburban expansion and rural development. High Halstow supports the rural development component, with the development of up to 820 homes and supporting infrastructure.

Evidence base

- Local Plan Sustainability Appraisal, A3.1-A3.3
- Habitats Regulations Assessment, A4.1 – A4.3
- Land Availability Assessment, B1
- Infrastructure Delivery Plan, B2
- Village Infrastructure Audit, B3
- Viability Assessment, B5
- Landscape Character Assessment, B7
- Local Housing Needs Assessment, B10

Explanation

13.108.2 The preferred spatial development strategy was defined through the SA (A3.2, page 33), HRA (A4.1 – A4.3), which confirmed support for a blended strategy including growth in Medway's rural communities, with a focus on the expansion of Hoo St Werburgh as the principal large village on the Hoo Peninsula, which provides services for the wider peninsula.

13.108.3 The strategy provides for a mix of development typologies, meeting wide housing needs, and supports the enhancement of services in rural communities. High Halstow has an established community and local facilities, and planned development will contribute to additional services and infrastructure, including a new primary school. The allocation has been planned to respect the village's rural setting while allowing High Halstow to make a meaningful contribution to the Borough's housing requirement.

13.108.4 Policy SA9 confirms the distinct identity of High Halstow. It will remain a rural settlement serving its local community rather than functioning as a higher-order centre, in contrast to Hoo St Werburgh. The village is a short distance from Hoo St Werburgh, where the strategy will deliver a strengthened range of services for local residents.

Conclusion

13.108.5 The Council considers that the allocation at Policy SA9 is justified by proportionate evidence, with particular reference to the SA (A3) and LAA (B1), effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.109 What assessment has been undertaken of landscape character impacts and how has Policy SA9 sought to maintain the character and identity of High Halstow?

Council's response

13.109.1 The policy has been informed by evidence in B7, Medway Landscape Character Assessment, and further assessment in A3, Sustainability Appraisal and B1, Land Availability Assessment. Policy SA9 sets out criteria that seek to maintain the character and identity of High Halstow.

Evidence base

- Medway Landscape Character Assessment (B7)
- Land Availability Assessment (B1, pages 437 and 451)
- Sustainability Appraisal (A3.1 – A3.3)

Explanation

13.109.2 The Landscape Character Assessment (B7) reviewed undeveloped areas across Medway, identifying key characteristics and influences and sets out development management guidance. The Council used the assessment (B7) as part of the wider evidence base for the plan to inform the spatial strategy and policy. Landscape impacts were also considered as criteria for site and policy assessment in the SA (A3) and for individual sites in the LAA (B1).

13.109.3 Policy SA9 includes criteria that seek to manage growth in a manner that maintains High Halstow's character, distinct identity and rural setting. These requirements are embedded throughout both the policy objective and the site-specific criteria.

13.109.4 The SA9 Policy Objective (criterion 1) states that development must be successfully integrated with the existing village and the surrounding countryside. This sets a clear expectation that growth should reinforce, rather than undermine, the village's established character.

13.109.5 Criterion 4 requires development to retain the distinct identity of High Halstow as an historic village and avoid coalescence with nearby settlements. This is to be achieved through the provision of landscape buffers, the careful treatment of the settlement edge and opportunities to enhance local landscape character. These measures will help retain the visual separation of High Halstow and protect its relationship with the wider countryside.

13.109.6 The character of the village is further protected through design requirements. Criterion 5 requires development to respect the village feel, achieve a high quality of design and provide defined character areas with variation in housing types, layout, density and landscaping.

13.109.7 Landscape and green infrastructure are central to the policy approach. Criterion 8 requires development to be landscape-led, responding positively to the countryside setting and providing high-quality green infrastructure that retains the rural character of the village. Criterion 9 further requires the provision of open space designed to integrate with the rural setting. Together, these measures establish a strong green framework that reinforces local character and the transition between the village and the surrounding countryside.

13.109.8 The policy also seeks to maintain village identity through the integration of new and existing communities. Criterion 3 requires development to maximise connectivity and permeability between the site and the existing village, ensuring that the new neighbourhood becomes part of High Halstow. Criterion 7 contributes by requiring a new primary school and local centre that complement the historic village centre.

Conclusion

13.109.9 The Council considers that Policy SA9 is justified by proportionate landscape evidence, and is effective in accommodating growth that preserves and enhances the character and identity of High Halstow over the plan period.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.110 How will Policy SA9 avoid unacceptable harm to the character and identity of High Halstow?

Council's response

13.110.1 Policy SA9 provides a comprehensive range of criteria to accommodate development that avoids unacceptable harm to the character and identity of High Halstow. These include landscape, green infrastructure and design requirements.

Evidence base

- Medway Landscape Character Assessment (B7)
- Heritage Asset Review (B9)

Explanation

13.110.2 The Policy has been informed by the evidence base on landscape (B7) and heritage (B9), and criteria refer to the established character and identity of High Halstow. These include criteria to avoid coalescence with neighbouring villages; protect and enhance the rural setting through green infrastructure, landscape buffers and open space; high quality design, and integration of new development with the existing village.

13.110.3 The Council considers that the policy contains robust and proportionate safeguards to ensure that the scale of growth proposed can be accommodated without causing unacceptable harm to the character, identity or rural setting of High Halstow.

Conclusion

13.110.4 The Council considers that Policy SA9 is effective in accommodating growth that avoids unacceptable harm to the character and identity of High Halstow, through the measures required in the policy criteria, and that it is positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.111 Are the proposed landscape buffers and safeguards justified and effective and are they sufficient to avoid unacceptable coalescence, encroachment into the countryside or harm to local character?

Council's response

13.111.1 Yes. The Council considers that the landscape buffers and wider safeguards within Policy SA9 are both justified and effective and provide a robust

framework to ensure that development can be accommodated without resulting in unacceptable coalescence, countryside encroachment or harm to the character and identity of High Halstow.

Evidence base

- Medway Landscape Character Assessment (B7)

Explanation

13.111.2 The Policy has been informed by the Plan's evidence base, including the Landscape Character Assessment B7 which provides guidance (P 473) to conserve the rural setting of villages, including High Halstow.

13.111.3 The Council considers that the safeguards are effective because they:

- Require landscape buffers specifically to avoid coalescence with nearby settlements
- Protect and enhance the interface between the village and the countryside;
- Require a landscape-led master-planned approach across the whole allocation
- Secure substantial green infrastructure and open space integrated with the rural setting
- Require development to respect the village feel and local character through high-quality design and
- Ensure that growth is integrated with the existing settlement without eroding its distinct identity.

13.111.4 These measures provide a comprehensive and enforceable framework for managing the relationship between the proposed development, the countryside and neighbouring settlements.

13.111.5 Importantly the allocation provides a significant separation between High Halstow and Hoo St Werburgh, retaining their distinct identities.

Conclusion

13.111.6 The Council considers that the Policy proposals are justified by proportionate evidence, effective in avoiding unacceptable coalescence, encroachment into the countryside or harm to local character, and are positively prepared and consistent with national policy in providing for sustainable development.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.112 What evidence demonstrates that local services, facilities and infrastructure can support the proposed growth set out within Policy SA9?

Council's response

13.112.1 The Council has considered the capacity of the existing infrastructure and the needs generated by the proposed growth in evidence base work, including B2, Infrastructure Delivery Plan, to identify required mitigations in Policy SA9.

Evidence base

- Sustainability Appraisal, Volume 3 (A3.3, pages 612-613, paragraph K.2.9.6)
- Infrastructure Delivery Plan, B2
- Village Infrastructure Audit, B3
- Strategic Transport Assessment, B18

Explanation

13.112.2 The Village Infrastructure Audit (B3, PDF page 36) considered the existing provision of services and facilities in villages across Medway. The Infrastructure Delivery Plan (B2) considered the current capacity of services across Medway and the enhancements required to meet the needs arising from planned growth. The Council consulted with service providers, such as Education, to determine the location and scale of mitigation required. The Policy requires the delivery of supporting services and infrastructure to meet the needs arising from planned development in High Halstow.

13.112.3 The Sustainability Appraisal (A3.3) assessed the impact of the Policy on Transport and Accessibility and Education). It noted that Policy SA9 requires the delivery of new services, including increased primary school provision, community services, green infrastructure and improved sustainable transport options.

13.112.4 In addition, growth at Hoo St Werburgh will deliver new services, such as a new supermarket, which will support High Halstow and other villages on the peninsula.

Conclusion

13.112.5 The Council considers that the Policy requirements for services and infrastructure are justified by proportionate evidence informing the Plan, effective in providing for sustainable development, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.113 What infrastructure improvements are required and how and when will they be delivered?

Council's response

13.113.1 The Policy requires specific infrastructure improvements to education, transport, green infrastructure, community facilities, in addition to the requirements in Policy S24 and the Council's Developer Contribution Guide.

Evidence base

- Infrastructure Delivery Plan (B2)
- Village Infrastructure Audit (B3)
- Strategic Transport Assessment (B18)
- Developer Contributions and Obligations Guide (B4)

Explanation

13.113.2 The Policy requires site specific infrastructure including a new 2 form entry primary school as an expansion and relocation of the High Halstow Primary School required by 2030. (see B2 page 100). In addition, there are requirements for transport mitigations, green infrastructure and community facilities. Development must also be in accordance with the Council's Infrastructure and Developer Contributions policy.

13.113.3 The completed S106 agreement for the consented hybrid planning application (MC.23/0855) at HHH26 sets out the financial contributions to services and infrastructure, and triggers and wider provisions for delivery.

Conclusion

13.113.4 The Council considers that the Policy provides for justified infrastructure which will deliver sustainable development.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.114 What assessment has been undertaken regarding impacts on ecology and heritage assets?

Council's response

13.114.1 The preparation of the plan included assessment of the impacts of development on a range of considerations, including ecology and heritage. These were intrinsic to the SA (A3) and LAA (B1), and drew on wider evidence, such as the Heritage Asset Review (B9).

Evidence base

- Sustainability Appraisal (A3.1 – A3.3)
- Habitats Regulations Assessment (A4)

- Land Availability Assessment (B1)
- Heritage Asset Review (B9)
- Landscape Character Assessment (B7

Explanation

13.114.2 The LAA considers natural and built constraints for all sites assessed for the Plan. The assessments for sites HHH15, HHH26 and HHH29 are set out in B1, pages 437-438, 451-452 and 1246).

13.114.3 The SA (A3.3) considered the impacts of the individual sites that form the allocation in Policy SA9 and the impacts of the Policy (pages 610-613) on Biodiversity and Geodiversity and Cultural Heritage.

13.114.4 The HRA (A4.1) table 7.1at page 68 identifies HHH26 and HHH29 as allocations located within the North Kent Marshes SSSI IRZ and which trigger consultation with Natural England due to the scale of development proposed. They were identified as having potential for urbanisation impacts upon the North Kent Marshes and the Functionally Linked Land. (Table 8.2, page 90). The sites are considered in Appendix F, Table G.4 pages 306-307).

13.114.5 The Medway Heritage Asset Review 2025 (B9) highlights the settlement as one of Medway's rural settlements and describes its character. B9 also refers to the Historic England Hoo Historic Landscape Project which includes character area assessments for many of the historic settlements on the peninsula including High Halstow. Criterion 4 of SA9 recognises the distinct identity of the village within its historic countryside setting.

13.114.6 B7 considers ecology and heritage assets in the assessments of the landscape character areas surrounding High Halstow. These include the National Nature Reserve in Northward Hill Landscape Character Area H1.

13.114.7 The Policy criteria include the landscape led approach and the requirement to retain the distinct identity of High Halstow as an historic village.

Conclusion

13.114.8 The Council considers that the Policy has been informed by proportionate evidence assessing the potential impacts on ecology and heritage assets, is effective in providing for sustainable development, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.115 Are the mitigation measures identified within the policy justified, effective and deliverable?

Council's response

13.115.1 Yes, the mitigations have been identified through the evidence base for the Plan, and assessed as effective in providing for sustainable development, and deliverable.

Evidence base

- Sustainability Appraisal (A3)
- Infrastructure Delivery Plan (B2)
- Strategic Transport Assessment (B18)
- Landscape Character Assessment (B7)
- Viability Assessment (B5)

Explanation

13.115.2 The mitigations required in the Policy have been identified through the evidence base for the Plan, including the Infrastructure Delivery Plan (B2), Strategic Transport Assessment (B18), and Landscape Character Assessment (B7). They have been assessed through the SA as effective in providing for sustainable development and as deliverable in the Viability Assessment.

Conclusion

13.115.3 The Council considers that the required mitigations are justified by proportionate evidence for the plan and effective and deliverable.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.116 Are there any ownership, environmental or infrastructure constraints identified that could affect delivery of the scale of development proposed on the allocated sites within Policy SA9 (HHH26, HHH29 and HHH15)?

Council's response

13.116.1 No ownership, environmental or infrastructure constraints have been identified that could affect the delivery of the proposed allocation.

Evidence base

- Land Availability Assessment (B1)
- Sustainability Appraisal (A3)

Explanation

13.116.2 The Land Availability Assessment (B1) considered ownership, environmental or infrastructure constraints for all sites. The assessments for sites HHH15, HHH26 and HHH29 are set out in B1, pages 437-438, 451-452 and 1246).

13.116.3 The developers and site promoters of sites HHH26 and HHH29 are working collaboratively to a shared strategic framework for their sites.

13.116.4 Site HHH15 is not dependent on site allocations HHH26 or HHH29. This small site has outline planning consent under MC/21/2065 for 5 self build homes, and subsequent reserved matters consents. Two plots are now complete and the others were under construction in 2025/26.

Conclusion

13.116.5 The Council considers that there are not any ownership, environmental or infrastructure constraints identified that could affect delivery of the scale of development proposed on the allocated sites.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.117 Are the component sites of SA9 available, suitable, viable and achievable within the anticipated timescales as set out in the housing trajectory?

Council's response

13.117.1 Yes. This is evidenced in the Land Availability Assessment and Housing Delivery Topic Paper, and the development status of sites.

Evidence base

- Land Availability Assessment (B1)
- Sustainability Appraisal (A3.1- A3.3)
- Housing Delivery Topic Paper (B22.5)

Explanation

13.117.2 The LAA (B1) and SA (A3) confirm that the sites are available, suitable, viable and achievable.

13.117.3 Site HHH15 is in advanced build out.

13.117.4 The Council has approved a hybrid planning application MC/23/0855 for Site HHH26, Land to the east of High Halstow for:

(i) Full Planning Application (Phase 1) for the erection of 270 no. residential units (including affordable housing) and the local centre (up to 1,000 sqm Use Classes E and F) with open space, associated vehicle, cycle and pedestrian access off Christmas Lane, upgrade of existing Public Right of Way, associated services and infrastructure, public realm, landscaping and SuDS. (with associated highway works and (ii) Outline Planning Application (all matters except for access, to be reserved for future determination) for the erection of up to 490no. residential units (including affordable housing), and a primary school (Use Class F1(a)) with new vehicular access points, car and cycle facilities and provision of public open space, sustainable drainage and landscaping works.

Conclusion

13.117.5 The Council considers that the proposed development will come forward as planned, given the current development status and interest.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.118 What delivery assumptions concerning Policy SA9 underpin its position within the housing trajectory and are they realistic?

Council's response

13.118.1 The Council's approach to delivery assumptions have been informed by recognised benchmarking and information from developers. They are considered realistic.

Evidence base

- Land Availability Assessment (B1)
- Housing Delivery Topic Paper (B22.5)

Explanation

13.118.2 The Land Availability Assessment considers delivery rates and phasing. The Council gathered information from developers and applied recognised benchmarking on delivery rates in the Lichfields Start to Finish report (2024). The Council's method and consideration is set out in the Housing Delivery Topic Paper (B22.5)

Conclusion

13.118.3 The Council considers that the assumptions are realistic.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

Policy SA10: Lower Rainham

13.119 What evidence demonstrates that the level of development at Lower Rainham (up to 863 new homes), as set out within Policy SA10, represents the most appropriate strategy when considered against reasonable alternatives?

Council's response

13.119.1 The level of development proposed at Lower Rainham was derived through the Council's assessment of reasonable alternatives as part of the preparation of the Spatial Development Strategy. Lower Rainham formed part of the wider North of Rainham Spatial Delivery Option assessed through the Sustainability Appraisal and was subsequently refined through the plan-making process, taking account of consultation responses, updated evidence and housing delivery requirements.

Evidence base

- Sustainability Appraisal - Volume 2 of 3 - Regulation 19 Report (ref: A3.2, Table 5.4, PDF page 39)

Explanation

13.119.2 The second Regulation 18 consultation tested three reasonable alternative spatial growth options and, following Sustainability Appraisal, identified the Blended Strategy as the preferred approach because it provided the most balanced and sustainable pattern of growth across Medway.

13.119.3 At a more detailed level, the Sustainability Appraisal assessed 12 Spatial Delivery Options, including the North of Rainham option. The Sustainability Appraisal (ref: A3.2, Table 5.4, PDF page 39) found that the North of Rainham option performed similarly to, or better than, many of the other Spatial Delivery Options against the sustainability objectives.

13.119.4 Following the Regulation 18 consultation, the Council reviewed its evidence base and housing supply assumptions. This included consideration of the reduced delivery expected from some strategic sites, the removal of certain site allocations, and the limited opportunities available to increase housing supply within existing urban areas. As part of this process, the Council refined the extent and scale of development proposed at North of Rainham, which was taken forward as Lower Rainham.

13.119.5 The submitted allocation does not comprise the entirety of the wider North of Rainham Spatial Delivery Option assessed through the Sustainability Appraisal. Rather, the Council selected specific sites that were considered suitable, available and

achievable, whilst not allocating the wider area promoted for development to the west of the allocations. The resulting capacity of up to 863 dwellings therefore reflects the Council's judgement, informed by the evidence base and reasonable alternatives assessment, as to the appropriate contribution that Lower Rainham should make towards meeting Medway's development needs.

Conclusion

13.119.6 The Council considers that Policy SA10 is justified because the scale of development proposed at Lower Rainham has been informed by the assessment of reasonable alternatives through the Sustainability Appraisal, consultation responses and subsequent review of the evidence base. The allocation forms part of the Spatial Development Strategy that was selected following consideration of alternative growth options and therefore contributes towards a Plan that is positively prepared, effective and consistent with national policy.

Proposed Main/Minor Modification

13.119.7 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.120 What reasonable alternatives were considered and why were the allocated sites selected?

Council's response

13.120.1 The Sustainability Appraisal - Volume 2 of 3 – Regulation 19 Report (ref: A3.2, Figure 5.2, PDF page 33) sets out how the reasonable alternatives were identified and appraised.

13.120.2 The Site Selection Topic Paper (ref: B22.1, paragraph 1.2) describes the relationship between the Land Availability Assessment, Sustainability Appraisal and the site selection process. Having identified a spatial strategy, the 'Policy-on' stage of the site selection/rejection process considered whether a site would contribute to the vision, spatial development strategy and strategic objectives. Taken together, the site allocations in the MLP (ref: A1) represent the most sustainable, deliverable and therefore appropriate approach to the delivery of new development during the Plan period.

13.120.3 The reasons for selecting specific sites are set out in the Sustainability Appraisal – Volume 3 of 3 – Appendices (ref: A3.3, Appendix J, Tables J.1.1 and J.1.2, PDF pages 550-569). For ease, the reasons for selecting the site allocations under Policy SA10 are reproduced below:

Site reference	Outline reason for selection / rejection provided by Medway Council
RN9	Following Regulation 18b consultation, site promoter has demonstrated how concerns and constraints could be addressed.
RN17	Following Regulation 18b consultation, site promoter has demonstrated how concerns and constraints could be addressed.
RN23	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.
RN25	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent.

13.121 What role does Lower Rainham, and its component site allocations (RN9, RN17, RN23 and RN25) play in contributing to and delivering the Plan's wider development strategy?

Council's response

13.121.1 Criterion 1 of Policy SA10 states that: "By 2033, the development of Rainham Parkside Village (RN9) will provide a green backdrop to the adjacent marshes at Riverside Country Park, with improved connections for people and nature." The four component allocations are intended to be read collectively, forming a coherent extension to the existing urban area rather than isolated development sites. This reflects the strategic role of Lower Rainham within the Spatial Development Strategy set out in Chapter 3 of the Plan.

13.122 How do the individual site allocations at RN9, RN17, EN23 and RN25 and the overall SA10 allocation relate to the existing urban area and settlement pattern?

Council's response

13.122.1 Lower Rainham plays an important role in delivering the Plan's Spatial Development Strategy by providing a transition between the urban area of Rainham and Twydall and the wider landscape setting of the Riverside Country Park and marshes.

13.123 Are the proposed development limits and site boundaries justified?

Council's response

13.123.1 Yes, the Council considers that the boundaries of sites RN9, RN17, RN23 and RN25 are justified. The boundaries originate from sites promoted through the Call for Sites process. The promoted sites were subsequently assessed through the Council's Land Availability Assessment, Sustainability Appraisal and wider evidence base. The

allocations represent sites that the Council considers suitable, available and achievable for development and capable of contributing positively to the Plan's Vision and strategic objectives.

13.124 What evidence is there to demonstrates that the allocations in Policy SA10 can be developed both individually and cumulatively without unacceptable effects on landscape character?

Council's response

13.124.1 The Council considers that the allocations within Policy SA10 can be developed both individually and cumulatively without unacceptable effects on landscape character. This conclusion is supported by the Landscape Character Assessment, which informed the preparation of Policy SA10 and establishes a landscape strategy for the Lower Rainham area.

Evidence base

- Landscape Character Assessment (ref: B7, PDF page 392-394)

Explanation

13.124.2 The Landscape Character Assessment (ref: B7, PDF page 392-394) identifies a specific landscape strategy for the Lower Rainham Farmland Character Area. The strategy seeks to conserve and enhance the rural character of the area, including the setting of the rural Conservation Areas at Lower Rainham and Lower Twydall, whilst improving functional connections for people and nature with the adjacent marshes and reinforcing the existing rectilinear landscape pattern through strengthened hedgerows and shelter belts.

13.124.3 The Council considers that this landscape strategy is reflected within Policy SA10. In particular, criteria 7 and 8 require the retention and enhancement of landscape character, green infrastructure, ecological connections and the interface between development and the wider countryside. The policy therefore seeks not only to mitigate landscape impacts but to secure landscape enhancement consistent with the recommendations of the Landscape Character Assessment (ref: B7, PDF page 392-394).

13.124.4 Furthermore, criterion 11 requires the preparation of a comprehensive masterplan informed by a Rural Design Code, a Green Infrastructure Strategy and an Open Space Strategy. The Council considers that these requirements provide an appropriate mechanism to assess and address cumulative landscape effects across the four component allocations and to ensure that development is planned comprehensively rather than on a piecemeal basis.

Conclusion

The Council considers that Policy SA10 is justified and effective, having been informed by the Landscape Character Assessment and supported by requirements for strategic masterplanning, green infrastructure planning and landscape-led design. The policy therefore provides an appropriate framework for ensuring that the individual and cumulative landscape effects of development are acceptable and consistent with the wider landscape strategy for Lower Rainham.

Proposed Main/Minor Modification

No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.125 How have heritage assets, their settings and archaeological interests informed the overall allocation within Policy SA10?

Council's response

13.125.1 Policy SA10 contains specific criteria intended to conserve the significance of heritage assets, respond to the historic landscape and ensure that new development respects the area's semi-rural historic character.

13.125.2 The Council also recognises the archaeological potential of the area and considers that further investigation and evaluation, where required, can be secured through the development management process.

Evidence base

- N/A

Explanation

13.125.3 The allocation has been informed by the presence of designated and non-designated heritage assets within and adjoining the Lower Rainham area. The supporting text and policy recognise the importance of the historic character of Lower Rainham, including the contribution made by the setting of the Lower Rainham Conservation Area and Lower Twydall Conservation Area to their significance.

13.125.4 Criterion 9 of Policy SA10 requires development proposals to consider impacts on the setting of these conservation areas and nearby listed buildings. The policy also recognises the importance of the historic landscape as part of the significance of both designated and non-designated heritage assets.

13.125.5 Criteria 6 and 8 further embed heritage considerations within the design of the allocation. Criterion 6 requires landscaping to respond positively to local landscape character, whilst criterion 8 requires secondary streets to follow historic field pattern boundaries, thereby reinforcing the historic grain and character of the landscape.

13.125.6 In addition, criterion 11 requires the preparation of a comprehensive masterplan informed by a Rural Design Code. The Council considers that this requirement provides an important mechanism for ensuring that the semi-rural character of the area, including its historic landscape setting and archaeological interest, is reflected in the detailed design of development across the allocation.

Conclusion

13.125.7 The Council considers that Policy SA10 is justified and effective, as heritage assets, their settings and the historic landscape character of Lower Rainham have directly informed the allocation and its development requirements. The policy provides a clear framework for conserving heritage significance whilst accommodating development in a manner consistent with national policy relating to the historic environment.

Proposed Main/Minor Modification

No modification proposed.

Reason for proposed Main/Minor Modification

N/A

13.126 How will important views, green infrastructure assets and heritage interests be protected or enhanced?

Council's response

13.126.1 The Council's response to question 13.125 is also relevant to this question. Policy SA10 contains a range of measures intended to protect and enhance important views, green infrastructure assets and heritage interests through landscape-led design, green infrastructure planning and heritage-sensitive masterplanning.

13.126.2 Together, these requirements are intended to ensure that important views, green infrastructure assets and heritage interests are not only protected but enhanced through the design and layout of development. The policies seek to integrate development with the surrounding landscape, strengthen ecological and green infrastructure networks, improve connections to the wider countryside and marshes, and reinforce the historic character of the area.

13.127 Are the policy requirements within Policy SA10 sufficiently precise to secure those outcomes?

Council's response

13.127.1 Yes. The Council considers that the requirements of Policy SA10 are sufficiently precise to secure the intended landscape, green infrastructure, heritage and design outcomes. These requirements provide a clear framework for applicants and decision-makers whilst allowing sufficient flexibility for detailed design matters to be

addressed through the planning application process. The policy therefore establishes both the outcomes to be achieved and the mechanisms through which those outcomes will be secured.

13.128 What transport improvements are required to support the development within the allocation?

Council's response

13.128.1 Policy SA10 contains site-specific requirements relating to access, movement and the design of streets. In particular, criterion 8 requires development to provide an appropriate street hierarchy and connections that integrate with the existing area whilst responding to the rural character of Lower Rainham.

13.128.2 The four Lower Rainham allocations (RN9, RN17, RN23 and RN25) were incorporated within the Strategic Transport Assessment and associated transport modelling work. The transport impacts arising from the allocations were therefore considered alongside the wider pattern of growth proposed by the Plan. The transport evidence identifies both strategic and local transport interventions required to support development across Medway, which is the focus for Matter 9.

13.129 How will sustainable travel choices be promoted?

Council's response

13.129.1 Sustainable travel choices will be promoted principally through the design and layout requirements of Policy SA10, particularly criterion 8, which seeks to ensure that development is well connected to surrounding areas and provides attractive routes for walking, cycling and other sustainable modes of travel.

13.129.2 The Council also notes that the certainty provided by an adopted Local Plan will assist in informing the preparation and implementation of the emerging Local Transport Plan, through which further sustainable travel interventions and investment priorities can be identified and delivered alongside growth.

13.130 Is the necessary infrastructure deliverable within the timescales envisaged?

Council's response

13.130.1 Yes. The Council considers that the infrastructure required to support the Lower Rainham allocation is deliverable within the timescales envisaged by the Plan and that there is a reasonable and proportionate basis for concluding that infrastructure can be provided alongside development. The housing trajectory for the Lower Rainham allocations reflects the Council's latest assessment of infrastructure requirements, lead-in times and deliverability assumptions. Accordingly, the Council considers that infrastructure delivery has been appropriately factored into the anticipated phasing of development.

13.130.2 The Council has noted Regulation 19 representations from NHS Kent & Medway (ref: C1.2, File U, PDF page 112): "We note that Rainham Parkside Village (RN9) will include up to 750 new homes and includes reference to a Health Hub. This is not required by the NHS in this area. The current capacity within the existing Rainham Healthy Living Centre is expected to be reconfigured to maximise the utilisation of this facility using some existing S106." Therefore, the Council is open to modifications to delete criterion 2.b.iv.

13.131 Are there any significant constraints relating to viability, land ownership, flood risk, contamination or infrastructure provision?

Council's response

13.131.1 No. The Council has not identified any significant constraints relating to viability, land ownership, flood risk, contamination or infrastructure provision that would prevent delivery of the Lower Rainham allocation.

13.132 Is the allocation set out in Policy SA10 capable of being delivered during the Plan period and as set out in the housing trajectoy?

Council's response

13.132.1 The Council considers that the component allocations are capable of being delivered. The housing trajectory is agreed in the Statement of Common Ground with Esquire Homes (ref: MLP/ED24D, paragraph 2.1.1).

Policy SA11: Rural Settlements

13.133 What is the justification for the overall approach to growth in the rural settlements?

Council's response

13.133.1 The overall approach directs a limited and proportionate contribution of housing growth to rural settlements as part of the preferred Blended Strategy. It does not assume that the SA11 locations have the same level of accessibility as urban or suburban locations. The Sustainability Appraisal (A3.3), paragraph K.2.11.5 (PDF p.619), expressly recognises that the allocations have somewhat limited access to existing services and infrastructure, with some sites outside the recommended sustainable distances to health, leisure, schools and rail. Paragraph K.2.11.5 nevertheless records that all sites are within the recommended distance of employment opportunities, that growth may help sustain local economies, and that other Plan policies provide for transport, school and service improvements. The approach therefore balances a modest rural housing contribution against the identified accessibility constraints rather than treating the rural settlements as primary service centres.

Evidence base

- B22.1, Site Selection Topic Paper, paragraphs 2.1.1-2.2.3 and Figure 1.
- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2.
- A3.2-A3.3, Sustainability Appraisal, sections 5.2-5.5 and 6.2; Appendix J.
- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and relevant site-allocation text.
- A3.2, Sustainability Appraisal, paragraphs 5.3.5-5.3.6, section 5.5 and Tables 5.5-5.6.

Explanation

13.133.2 The rural element of the strategy was not developed in isolation. The Sustainability Appraisal Volume 2: Regulation 19 Report (A3.2) compared alternative growth levels and spatial strategies and identified the Blended Strategy as providing the most sustainable overall balance. The Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1) then applied a consistent site-selection process to land within and adjoining rural settlements. Policy SA11 therefore performs a defined strategic role: it provides non-strategic and locally scaled supply, broadens the range of sites and supports rural communities, while the majority of growth remains directed to urban, suburban and strategic locations. This response should be read with Questions 13.134-13.138, which address distribution, settlement function and cumulative effects. In particular, the Site Selection Topic Paper (B22.1) explains the relationship between the LAA, Sustainability Appraisal (A3.1-A3.3) and allocation process at paragraphs 1.2.1-1.2.3 (PDF p.3), and Figure 1 and paragraphs 2.1.1-2.2.3 (PDF pp.4-5) show the four-stage process and comprehensive identification of 462 potential sites. Sustainability Appraisal Volume 2: Regulation 19 Report (A3.2) sections 5.2-5.5 and Tables 5.5-5.6 provide the comparative appraisal of the spatial options, rather than relying on the rural component in isolation.

Conclusion

13.133.3 The approach is positively prepared and justified by the spatial-strategy, sustainability and site-selection evidence. No Main Modification is required; the minor modification set out below is recommended to improve clarity and precision.

Proposed Main/Minor Modification

13.133.4 Minor Modification: amend criterion 2 of Policy SA11 to read:

> "Development proposals will be required to comply with the relevant requirements of Policies S2 and S3, having regard to the scale, location and particular sensitivities of the site."

Reason for proposed Main/Minor Modification

13.133.5 To clarify that only the requirements of Policies S2 and S3 relevant to an individual site and proposal apply. The change improves precision and avoids implying

that every requirement of both strategic policies applies identically to every SA11 allocation. It does not alter the allocation strategy or introduce a new policy requirement.

13.134 How does the distribution of growth, as set out in Policy SA11, relate to the settlement hierarchy and wider spatial development strategy of the Plan?

Council's response

13.134.1 The distribution follows the settlement hierarchy and the wider Blended Strategy. Greater growth is directed to settlements with a stronger range of services and transport connections, while allocations in smaller settlements are limited and locally proportionate.

Evidence base

- B22.1, Site Selection Topic Paper, paragraphs 2.1.1-2.2.3 and Figure 1.
- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2.
- A3.2-A3.3, Sustainability Appraisal, sections 5.2-5.5 and 6.2; Appendix J.
- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and relevant site-allocation text.
- A3.2, Sustainability Appraisal, section 5.5 and Tables 5.5-5.6.

Explanation

13.134.2 The hierarchy provides the starting point, but it is not applied mechanically. The amount of development in each settlement also reflects available and suitable land, environmental constraints, infrastructure capacity and the outcome of sustainability appraisal. The Site Selection Topic Paper (B22.1) records the sequential process by which identified sites were assessed and then considered against the Vision, strategic objectives, spatial strategy and wider evidence. The distribution in SA11 should therefore be read alongside the assessment of scale at Question 13.136 and the evidence on cumulative effects and infrastructure at Questions 13.138 and 13.141-13.144. The evidential link is therefore traceable: Site Selection Topic Paper (B22.1), paragraph 2.4.3 (PDF p.6) requires each site to be considered for its contribution to the Plan vision, strategic objectives and spatial strategy, while paragraph 2.4.5 records that policy preparation and concept planning were used to identify opportunities and ways of overcoming constraints.

Conclusion

13.134.3 The distribution is consistent with the settlement hierarchy and wider strategy and is justified by proportionate evidence. No modification is required.

Proposed Main/Minor Modification

13.134.4 N/A

Reason for proposed Main/Minor Modification

13.134.5 N/A

13.135 How were individual sites selected and what alternatives were considered?

Council's response

13.135.1 Individual sites were selected through the four-stage process described in B22.1: identification, assessment, policy-on consideration and final selection or rejection. Reasonable alternatives were assessed through the LAA and Sustainability Appraisal, with reasons for selection and rejection recorded in A3.3 Appendix J.

Evidence base

- B22.1, Site Selection Topic Paper, paragraphs 2.1.1-2.2.3 and Figure 1.
- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2.
- A3.2-A3.3, Sustainability Appraisal, sections 5.2-5.5 and 6.2; Appendix J.
- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and relevant site-allocation text.

Explanation

13.135.2 The Site Selection Topic Paper (B22.1) explains that the Land Availability Assessment (B1) first identified a wide pool of potential sites. Those sites were assessed for suitability, availability and achievability, while the Sustainability Appraisal (A3.1-A3.3) provided a comparable assessment of likely environmental, social and economic effects. Regulation 18 representations and subsequent promoter engagement informed the process. The Council then applied the Plan's Vision, strategic objectives, spatial strategy and wider topic evidence before selecting or rejecting sites. Sustainability Appraisal Volume 3: Appendices (A3.3), Appendix J provides the audit trail for reasonable alternatives. This methodology is also relevant to SA12 and is cross-referred to at Questions 13.149-13.150. The detail of the process is set out at Site Selection Topic Paper (B22.1), paragraphs 2.2.1-2.5.3 (PDF pp.4-6). These passages distinguish comprehensive identification, LAA and SA assessment, policy-on consideration and the final professional judgement, and expressly direct the reader to Sustainability Appraisal (A3.1-A3.3).3 Appendix J for the reasons for selection or rejection.

Conclusion

13.135.3 The selection methodology and consideration of reasonable alternatives are transparent, proportionate and justified. No modification is required.

Proposed Main/Minor Modification

13.135.4 N/A

Reason for proposed Main/Minor Modification

13.135.5 N/A

13.136 Is the scale of growth proposed for each settlement proportionate to its role, function and level of services?

Council's response

13.136.1 Yes. The scale of growth has been considered having regard to the role and function of individual settlements and the development opportunities identified through the plan-making process. The settlement hierarchy provides the strategic context, while the amount of development proposed reflects the amount and capacity of land identified through the Land Availability Assessment and its subsequent assessment for suitability, availability, achievability and sustainability. The allocations in Policy SA11 are therefore the output of that process, rather than the starting point for determining the appropriate scale of growth.

Evidence base

- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and Policy SA11.
- B1, B1 Land Availability Assessment 6, Introduction; paragraphs 1.1.1–1.1.7, 1.2.1–1.2.4 and 2.1.1–2.2.5; and relevant individual site assessments in Appendix E.
- B22.1, Site Selection Topic Paper, paragraphs 2.1.1–2.5.3 and Figure 1.
- A3.2–A3.3, Sustainability Appraisal, including Appendix G, Assessment of Non-Strategic Reasonable Alternative Sites (Pre-Mitigation); Appendix I, Assessment of Reasonable Alternative Sites (Post-Mitigation); Appendix J, Selection and Rejection of Reasonable Alternative Sites; and Appendix K, Assessment of Site Allocations.
- B2, Infrastructure Delivery Plan and Infrastructure Delivery Schedule.
- B18.1–B18.12, Strategic Transport Assessment evidence.

Explanation

13.136.2 The scale of growth is not based on applying a uniform percentage or numerical requirement to individual rural settlements. The settlement hierarchy provides the strategic context for their relative role and function, while the amount of development capable of being accommodated is informed by the land identified and assessed through the plan-making process.

13.136.3 B1 Land Availability Assessment 6 (B1), paragraphs 1.1.1–1.1.7, explains the comprehensive Stage 1 identification of potential land and paragraphs 1.2.1–1.2.4 the initial survey and screening process. At Stage 2, paragraph 2.1.1 confirms that sites progressing through the process were assessed for development potential, suitability,

availability and achievability, including planning officer judgement in relation to site-specific constraints; paragraph 2.1.2 identifies Appendix E as containing the individual site assessments; and paragraphs 2.2.1–2.2.5 explain the approach to assessing development potential. The LAA therefore identifies and assesses potential development opportunities but does not itself determine which sites should ultimately be allocated.

13.136.4 The Sustainability Appraisal provides the subsequent assessment of those development opportunities. A3.3 Sustainability Appraisal - Volume 3 of 3 - Appendices 15.pdf identifies Appendix G as the assessment of non-strategic reasonable alternative sites before mitigation, Appendix I as the post-mitigation assessment, Appendix J as the selection and rejection of reasonable alternatives and Appendix K as the assessment of site allocations. The evidence therefore establishes a clear sequence of land identification → LAA assessment → SA assessment of reasonable alternatives → selection/rejection → allocation.

13.136.5 **All Saints**. Land relevant to All Saints was considered through the B1 Stage 2 process described at paragraphs 2.1.1–2.2.5 and the individual site assessments in Appendix E. AS11 and AS25 were then considered through the Sustainability Appraisal reasonable-alternatives and site-selection process, comprising the assessment stages recorded in A3.3 Appendices G, I and J and, following site selection, Appendix K. The resulting scale of development should therefore be understood as the outcome of identifying and assessing available development opportunities, rather than application of a predetermined settlement growth quota.

13.136.6 **Cuxton**. Potential land within the relevant area was similarly considered through the B1 Stage 2 assessment of development potential, suitability, availability and achievability at paragraphs 2.1.1–2.2.5 and the relevant Appendix E site assessments. The SA evidence identifies CHR14 within the Cuxton, Halling & Riverside ward and its assessment falls within the sequential reasonable-alternatives, selection/rejection and allocation assessment undertaken through A3.3 Appendices G, I, J and K. As the verified SA evidence identifies the ward rather than conclusively establishing from that evidence alone the site's relationship with the individual settlement of Cuxton, the evidence demonstrates the assessment of available land in the relevant area without relying upon the CHR reference itself to establish settlement location.

13.136.7 **Cliffe**. Potential development land relevant to the settlement was considered through the same LAA methodology, including the Stage 1 identification and screening process at B1 paragraphs 1.1.1–1.2.4 and the Stage 2 assessment at paragraphs 2.1.1–2.2.5, with individual site assessments contained within Appendix E. Those development opportunities were subsequently subject to the reasonable-alternatives and site-selection stages recorded in A3.3 Appendices G, I and J, followed

by the appraisal of selected allocations in Appendix K. The scale of growth should therefore be understood by reference to the available development opportunities capable of progressing through that assessment, rather than by attributing a predetermined numerical requirement to Cliffe.

13.136.81 **Cliffe Woods**. Development opportunities around Cliffe Woods were similarly considered through the Stage 1 and Stage 2 LAA processes at B1 paragraphs 1.1.1–1.2.4 and 2.1.1–2.2.5, together with the individual site records contained in Appendix E. The subsequent Sustainability Appraisal process assessed reasonable alternatives through A3.3 Appendices G and I, recorded their selection or rejection in Appendix J, and assessed the resulting allocations in Appendix K. The resulting pattern of development therefore reflects consideration and assessment of identified development opportunities around the settlement rather than application of a uniform rural growth figure.

13.136.9 Collectively, the evidence demonstrates an iterative settlement- and site-specific process. The settlement hierarchy establishes the strategic context; B1 identifies potentially available land and assesses its development potential, suitability, availability and achievability; the Sustainability Appraisal assesses reasonable alternatives; and the subsequent selection process determines which opportunities are appropriate to take forward. Policy SA11 represents the final output of that process.

13.136.10 Therefore, the allocations should not be understood as evidence used retrospectively to justify the scale of growth. Rather, they reflect the proportion of growth capable of being accommodated following consideration of settlement role and function, the availability and development potential of land, and the constraints and sustainability considerations identified through the LAA, SA and site-selection process.

Conclusion

13.136.11 The scale of growth proposed through Policy SA11 is proportionate to the role and function of the settlements and the development opportunities capable of being accommodated. The settlement hierarchy provides the strategic context, while the LAA, Sustainability Appraisal and site-selection process establish the available development opportunities and determine which can appropriately be taken forward. The allocations in Policy SA11 are the final output of that assessment. No modification is required.

Proposed Main/Minor Modification

13.136.12 N/A

Reason for proposed Main/Minor Modification

13.136.13 N/A

13.137 What evidence supports the distribution of development between the various settlements?

Council's response

13.137.1 The distribution is supported by the settlement hierarchy, the Sustainability Appraisal of spatial alternatives, the LAA and site-selection evidence, and the transport, infrastructure and environmental evidence applied to individual settlements and sites.

Evidence base

- B22.1, Site Selection Topic Paper, paragraphs 2.1.1-2.2.3 and Figure 1.
- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2.
- A3.2-A3.3, Sustainability Appraisal, sections 5.2-5.5 and 6.2; Appendix J.
- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and relevant site-allocation text.
- B2, Infrastructure Delivery Plan.
- B18.1-B18.12, Strategic Transport Assessment evidence.

Explanation

13.137.2 The evidence performs complementary functions. Sustainability Appraisal Volume 2: Regulation 19 Report (A3.2) explains why a blended spatial strategy was preferred; Land Availability Assessment (B1) identifies the supply and constraints of potential land; The Site Selection Topic Paper (B22.1) records how those findings were translated into selection decisions; and the transport, infrastructure, flood-risk, landscape, heritage and habitats evidence tests whether the resulting distribution is capable of being accommodated. This question should therefore be read with the methodology at Question 13.135 and the cumulative assessment at Questions 13.138-13.144, rather than treating any single document as the sole justification. Site Selection Topic Paper (B22.1), paragraphs 2.3.1-2.3.11 (PDF pp.5-6) identify the factors tested at site level, including planning status, public transport, regeneration potential, availability, viability and promoter evidence. Paragraphs 2.4.1-2.4.5 (PDF p.6) then explain how those findings were reconciled with the preferred Blended Strategy and other topic evidence.

Conclusion

13.137.3 The distribution is supported by a coherent and proportionate evidence base. No modification is required.

Proposed Main/Minor Modification

13.137.4 N/A

Reason for proposed Main/Minor Modification

13.137.5 N/A

13.138 What assessment has been undertaken of cumulative impacts arising from the allocations across the rural settlements?

Council's response

13.138.1 Cumulative effects were assessed through the Sustainability Appraisal and HRA at plan level, with transport and infrastructure effects assessed through the Strategic Transport Assessment and IDP. Site-level constraints were then considered through the LAA and site-selection process.

Evidence base

- A3.1-A3.3, Sustainability Appraisal, including site-allocation assessments and Appendix J.
- A4.1-A4.3, Habitats Regulations Assessment.
- B6.1-B6.5, Strategic Flood Risk Assessment evidence.
- B7, Medway Landscape Character Assessment 2024.
- B9, Medway Heritage Asset Review 2025.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- Medway Council Matter 4, responses 4.34-4.39.
- Medway Council Matter 6, relevant responses on biodiversity, landscape and flood risk.
- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.

Explanation

13.138.2 The Council's assessment is layered. Sustainability Appraisal (A3.1-Sustainability Appraisal Volume 3: Appendices (A3.3)) consider the combined effects of the preferred strategy and allocations against the SA objectives; Habitats Regulations Assessment (A4.1-A4.3) considers effects on habitats sites, including in combination; Strategic Transport Assessment evidence (B18.1-B18.12) assesses network effects of planned growth; and B2 identifies infrastructure requirements and delivery responsibilities. The Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1) provide the site-level link by identifying constraints and mitigation relevant to individual allocations. Questions 13.139-13.144 address the principal environmental and infrastructure components in greater detail. The strategic and site-level strands perform different functions. Sustainability Appraisal (A3.1-A3.3).1-A3.3 assess the preferred strategy and allocations against the SA framework; A4.1-A4.3 address effects on habitats sites, including in combination; B18 assesses network-wide transport effects; and Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2),

paragraphs 1.2.3-1.2.7 (PDF p.11) and 1.3.1-1.3.13 (PDF pp.12-14) explain the infrastructure-planning and delivery framework. B1 and B22.1 then identify the constraints and mitigation relevant to individual allocations.

Conclusion

13.138.3 The cumulative effects of the rural allocations have been assessed through the combined strategic and site-level evidence. No modification is required.

Proposed Main/Minor Modification

13.138.4 N/A

Reason for proposed Main/Minor Modification

13.138.5 N/A

13.139 How have impacts on landscape character, biodiversity, heritage assets and the setting of settlements been assessed and taken into account?

Council's response

13.139.1 Landscape, biodiversity, heritage and settlement-setting effects were considered through the LAA, site-selection process, Sustainability Appraisal and HRA, informed by the Medway Landscape Character Assessment 2024 and Medway Heritage Asset Review 2025. Those assessments informed site selection, development capacity and the policy framework applying to the allocations. The Council acknowledges objections that Policy SA11 contains limited site-specific criteria. However, SA11 does not operate as a self-contained development-management policy: its allocations must be read together with criterion 2, Policies S2 and S3 and the Plan's thematic policies for landscape, biodiversity, heritage, design and infrastructure.

Evidence base

- A3.1-A3.3, Sustainability Appraisal, including site-allocation assessments and Appendix J.
- A4.1-A4.3, Habitats Regulations Assessment.
- B6.1-B6.5, Strategic Flood Risk Assessment evidence.
- B7, Medway Landscape Character Assessment 2024.
- B9, Medway Heritage Asset Review 2025.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- A1, Submission Medway Local Plan 2041, Policy SA11, Policies S2 and S3 and relevant landscape, biodiversity, heritage and design policies.
- Medway Council Matter 4, responses 4.34-4.39.

- Medway Council Matter 6, relevant responses on biodiversity, landscape and flood risk.

Explanation

13.139.2 The environmental evidence was applied at both strategic and site level. The Sustainability Appraisal and HRA identify likely environmental effects and the role of mitigation; B7 provides the landscape-character framework; B9 identifies heritage significance, character and constraints; and B1/B22.1 record how site-specific constraints were taken into account through land assessment and site selection. This evidential relationship is also explained elsewhere in the Council's Matter 13 statement, which identifies B1 site records as the source of site-specific evidence and B22.1 as the site-selection evidence.

13.139.3 For **landscape and settlement setting**, A3.3 Appendix E, including Box E.5.3, records the use of the Medway Landscape Character Assessment 2024 (B7), including the characteristics of the relevant landscape character areas, within the SA methodology. The Council's existing Matter 13 drafting also records that B7 provides the landscape-character baseline against which landscape sensitivity and settlement setting can be understood.

13.139.4 For **heritage**, B9 provides the strategic heritage baseline. The Council's evidence identifies the Heritage Asset Review as addressing significance, character and constraints and referring to further contextual sources including the Hoo Historic Landscape Project, Defence of Kent Project and Kent Historic Landscape Characterisation. The supporting text at paragraph 14.12.6 also requires proposals to have careful regard to coastal landscape and heritage and to accord with rural character.

13.139.5 For **biodiversity**, the HRA provides the plan-level assessment of implications for habitats sites, while the Sustainability Appraisal considers the wider biodiversity and ecological effects of the spatial strategy, reasonable alternatives and proposed allocations. The LAA and Site Selection Topic Paper complement those assessments by identifying environmental constraints relevant to individual sites and incorporating them into the assessment and selection of land.

13.139.6 The Council acknowledges the objection Kent Downs National Landscape team that the criteria in Policy SA11 are limited and do not themselves set out a comprehensive schedule of site-specific environmental requirements. That does not mean, however, that the allocations are without development-management safeguards. The Council's position is that SA11 must be read as part of the Plan as a whole. Criterion 2 expressly links the allocations to the relevant requirements of Policies S2 and S3, while the Plan's thematic policies provide the applicable development-management tests for landscape, biodiversity, heritage, design, infrastructure, flood risk and amenity.

13.139.7 Therefore, Policy SA11 performs a different function from those thematic policies. It identifies the land allocated for development and the principal requirements applying to it; it does not seek to duplicate within each allocation every landscape, ecological, heritage or other development-management requirement that applies through the Plan as a whole. The evidence supporting each allocation nevertheless remains relevant when a proposal comes forward, alongside the policy requirements of the development plan. This provides the evidence-to-policy relationship necessary to understand the constraints which informed the allocation without unnecessarily reproducing the wider policy framework within SA11. This is consistent with the Council's existing explanation that SA11 should not be read as a self-contained policy and that the wider Plan supplies the applicable thematic tests.

13.139.8 The concern about the limited wording of criterion 2 is also addressed by the clarifying minor modification already proposed elsewhere in Matter 13, which makes clear that the requirements of Policies S2 and S3 apply insofar as they are relevant to the individual site and proposal. The Council's recorded reason for that change is to improve precision and avoid implying that every requirement of both strategic policies applies identically to every SA11 allocation, without changing the allocation strategy or introducing a new policy requirement.

13.139.9 The Council therefore does not consider that soundness requires Policy SA11 to reproduce a separate suite of detailed environmental criteria for every allocated site. The evidence demonstrates that the relevant constraints were considered during site assessment and selection, while the Plan provides the policy framework against which those matters must be addressed when individual proposals are determined. The relationship between the mitigation requirements and Policies S2 and S3 is addressed further at Question 13.140.

Conclusion

13.139.10 The Council acknowledges the objection that Policy SA11 contains limited site-specific criteria. However, the absence of a comprehensive schedule of individual landscape, biodiversity and heritage criteria within SA11 does not mean that those matters have not been assessed or are left without policy protection. They were considered through the LAA, SA, HRA and site-selection evidence, and proposals will be considered against SA11 together with the relevant requirements of Policies S2 and S3 and the Plan's thematic development-management policies. The proposed clarification to criterion 2 makes that relationship more explicit. On that basis, the Council considers Policy SA11 effective and does not consider additional site-specific criteria necessary.

Proposed Main/Minor Modification

13.139.11 Minor Modification to criterion 2 of Policy SA11: amend criterion 2 to clarify that development should accord with the relevant requirements of Policies S2 and S3.

Reason for proposed Main/Minor Modification

13.139.12 To make clear that the requirements of Policies S2 and S3 apply insofar as they are relevant to the individual allocation and proposal, thereby improving the clarity and effectiveness of the relationship between Policy SA11 and the wider policy framework without introducing a new policy requirement or changing the allocation strategy.

13.140 Are mitigation measures identified within Policy SA11, in reference to Policies S2 and S3, effective and deliverable?

Council's response

13.140.1 Yes. Policies S2 and S3 establish strategic safeguards for the natural environment and landscape, while SA11 identifies allocation-specific requirements. Detailed measures will be refined through proportionate technical assessment and secured through conditions, obligations and phasing where necessary.

Evidence base

- A3.1-A3.3, Sustainability Appraisal, including site-allocation assessments and Appendix J.
- A4.1-A4.3, Habitats Regulations Assessment.
- B6.1-B6.5, Strategic Flood Risk Assessment evidence.
- B7, Medway Landscape Character Assessment 2024.
- B9, Medway Heritage Asset Review 2025.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- Medway Council Matter 4, responses 4.34-4.39.
- Medway Council Matter 6, relevant responses on biodiversity, landscape and flood risk.
- A1, Policies S2, S3, SA11 and relevant development-management policies.
- B5, Viability Assessment, Chapter 12.

Explanation

13.140.2 The effectiveness of mitigation depends on a clear relationship between the strategic policy framework and site-specific requirements. The plan-level evidence identifies the principal constraints and potential mitigation; SA11 applies those findings to the allocations; and detailed surveys and assessments at application stage will establish the precise design and timing of measures where effects depend on layout or operation. Viability has been considered on a plan-wide basis. Questions 13.139 and 13.141-13.144 identify the environmental and infrastructure evidence to which the mitigation responds. Site Selection Topic Paper (B22.1), paragraph 2.4.5 (PDF p.6) confirms that site-allocation criteria and concept planning were used to identify

opportunities and means of overcoming constraints. Viability Assessment (B5), Chapter 12 provides the plan-wide viability check on the cumulative policy burden.

13.140.3 Therefore, application-stage detail will refine measures already grounded in the plan evidence; it does not defer the question of whether mitigation is feasible in principle.

Conclusion

13.140.4 The mitigation framework is effective and deliverable, subject to proportionate application-stage detail. No modification is required.

Proposed Main/Minor Modification

13.140.5 N/A

Reason for proposed Main/Minor Modification

13.140.6 N/A

13.141 Can existing local infrastructure, services and facilities accommodate the proposed growth?

Council's response

13.141.1 The evidence indicates that growth can be accommodated, subject to the delivery of identified site-specific and cumulative infrastructure measures. Capacity is not assumed to be uniform, and proposals must demonstrate that the services and facilities required for the relevant site or phase will be available when needed.

Evidence base

- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.
- Medway Council Matter 3, responses 3.8.1-3.8.2.

Explanation

13.141.2 B2 identifies the infrastructure required to support planned growth and records delivery information in the IDS. The Strategic Transport Assessment tests transport effects across the Plan, while site selection and Sustainability Appraisal (A3.1-A3.3) consider accessibility and service provision. The Council's Matter 3 response 3.8 explains that the trajectory was informed by engagement with promoters, providers and statutory consultees and by infrastructure evidence. Detailed requirements for improvements, transport, education, health and wastewater are addressed at Questions 13.142-13.144. Infrastructure Delivery Plan and Infrastructure Delivery

Schedule (B2), paragraphs 1.2.3-1.2.7 (PDF p.11) explain the purpose and scope of the infrastructure evidence, while paragraphs 1.3.1-1.3.13 (PDF pp.12-14) explain how the IDP and Infrastructure Delivery Schedule identify needs, delivery bodies, timing and funding information. This provides a firmer basis for the conclusion than an assumption that existing capacity is uniform or presently unconstrained.

Conclusion

13.141.3 Existing services and facilities, together with identified improvements, provide an effective basis for accommodating growth. No modification is required.

Proposed Main/Minor Modification

13.141.4 N/A

Reason for proposed Main/Minor Modification

13.141.5 N/A

13.142 What improvements to existing infrastructure are required and how will they be secured?

Council's response

13.142.1 Required improvements vary by settlement and site and may include highway and sustainable-transport measures, education and health provision, utilities and wastewater capacity, drainage and flood-risk measures, and green and blue infrastructure. The Plan provides the framework for determining both the effects requiring assessment at application stage and the mitigation necessary to address them. Plan-level and site-selection evidence identifies the principal known constraints and potential mitigation; the relevant allocation and thematic policies establish the matters that proposals must address; and proportionate application-stage technical assessment then defines the precise effects of the particular proposal and the mitigation necessary in response.

13.142.2 The resulting mitigation package is therefore not determined afresh without guidance at application stage. It refines the mitigation already identified at plan-making stage in response to the scale, form, layout and effects of the particular proposal. Infrastructure necessary to support development is then secured through the appropriate delivery mechanisms.

Evidence base

- B2, Infrastructure Delivery Plan, paragraphs 1.2.3–1.2.7 and 1.3.1–1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1–B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.

- B1, Land Availability Assessment and relevant site records.
- B22.1, Site Selection Topic Paper, including paragraph 2.4.5.
- A3.1–A3.3, Sustainability Appraisal, including pre- and post-mitigation site assessments.
- A1, Policy S24, Policy SA11 and relevant transport, infrastructure and development-management policies.
- Medway Council Matter 3, responses 3.8.1–3.8.2.

Explanation

13.142.3 The Plan establishes a two-stage relationship between plan-making evidence and application-stage assessment. At plan-making stage, the LAA, Sustainability Appraisal, site-selection evidence, transport evidence and infrastructure planning identify the principal constraints, likely effects and broad mitigation relevant to development of the allocations. B22.1 paragraph 2.4.5 (PDF p.6) confirms that site-allocation criteria and concept planning were used to identify opportunities and means of overcoming constraints. The Council's response at 13.140 consequently explains that detailed application-stage assessment refines mitigation already grounded in the plan evidence rather than deferring consideration of whether mitigation is feasible in principle.

13.142.4 The Sustainability Appraisal demonstrates the same approach. Its post-mitigation assessment considers how mitigating factors, including Local Plan policies and other guidance, can avoid or reduce effects identified at the pre-mitigation stage, and recognises that the level of intervention required to achieve effective mitigation can influence site selection. A3.3 Sustainability Appraisal - Volume 3 of 3 - Appendices 5 1 explains that the pre-mitigation effects are considered alongside the mitigation provided through Local Plan policies and the resulting post-mitigation effects.

13.142.5 At application stage, the matters requiring further assessment are therefore directed by the known site constraints identified through the plan evidence, the requirements applicable to the allocation and the relevant thematic development-management policies. Where the significance or precise nature of an effect depends upon the eventual scale, layout or operation of a development, detailed assessment at application stage establishes the effect and allows the precise form, extent and timing of mitigation to be determined. This is consistent with the Council's explanation elsewhere in Matter 13 that plan-stage suitability does not determine every application-stage detail.

13.142.6 The infrastructure evidence then provides the delivery framework. B2 Infrastructure Delivery Plan (December 2025), paragraph 1.3.13, confirms that the IDS identifies infrastructure projects, implementation bodies and, where known, delivery timescales, indicative costs and potential funding sources. Paragraph 1.3.12 recognises that future service requirements and associated costs can change, including in relation

to transport, utilities, broadband and green and blue infrastructure. The transport evidence provides the corresponding assessment and mitigation framework for transport effects.

13.142.7 The package of mitigation is therefore arrived at by bringing these elements together: identified site constraints and plan-level mitigation provide the starting point; the applicable policies identify the outcomes and requirements to be met; and application-stage technical evidence establishes the detailed effects of the proposal and the measures required in response. The precise package can accordingly respond to the particular development while remaining grounded in effects and mitigation already considered through the plan-making process. This is consistent with the Council's established position that detailed surveys and assessments determine precise design and timing where effects depend on layout or operation.

13.142.8 The IDP and IDS then provide the principal infrastructure delivery framework. Infrastructure necessary to make development acceptable can be coordinated with development phasing and secured through the appropriate planning and infrastructure delivery mechanisms. The monitoring of infrastructure delivery is addressed in Matter 14.

Conclusion

13.142.9 The Plan provides a clear route from identified plan-level and site-specific constraints, through application-stage assessment, to the identification and delivery of proportionate mitigation. Application-stage assessment refines the effects and mitigation already identified through the plan-making evidence; it does not defer consideration of whether the allocations are capable of being appropriately mitigated. The Council therefore considers that the Plan provides an effective framework for identifying, securing and phasing necessary infrastructure and mitigation.

Proposed Main/Minor Modification

13.142.10 N/A

Reason for proposed Main/Minor Modification

13.142.11 N/A

13.143 Have the implications for highway safety and accessibility been adequately assessed?

Council's response

13.143.1 Yes. The transport and accessibility implications of the rural allocations have been considered through the Strategic Transport Assessment (B18.1–B18.12),

Sustainability Appraisal (A3.1–A3.3), Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1).

B18.1 Strategic Transport Assessment - Forecasting Report, section 2.6.1, confirms that the Sustainable Transport Strategy grouped 100 proposed site allocations into 28 geographical clusters. The 12 largest clusters, representing 91% of proposed dwellings and 99% of proposed jobs, were then examined in greater detail because they offered the greatest potential for reducing highway trip rates and delivering sustainable mitigation.

13.143.2 The smaller rural allocations were therefore included within the wider clustering exercise, while the Sustainability Appraisal separately considered their accessibility. Detailed site access and highway-safety matters dependent on the scale, layout and design of individual proposals will be assessed at application stage.

Evidence base

- B18.1, Strategic Transport Assessment – Forecasting Report, section 2.6.1.
- B18.1–B18.12, Strategic Transport Assessment evidence.
- A3.1–A3.3, Sustainability Appraisal, including A3.3 paragraph K.2.11.5.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- A1, Submission Medway Local Plan 2041, Policy S24 and relevant transport and site-allocation policies.

Explanation

13.143.3 The transport evidence takes a proportionate approach reflecting the scale and distribution of development. B18.1 Strategic Transport Assessment - Forecasting Report, section 2.6.1, confirms that all 100 proposed allocations were grouped into 28 geographical clusters, with more detailed sustainable-transport work focused on the 12 largest clusters, representing 91% of proposed dwellings and 99% of proposed jobs. The fact that individual smaller rural allocations were not subject to the same level of detailed strategic assessment does not therefore mean that they were excluded from the wider assessment.

13.143.4 Accessibility was also considered through the Sustainability Appraisal and site-selection process. A3.3 paragraph K.2.11.5 (PDF p.619) expressly recognises that the SA11 allocations have somewhat limited access to existing services and infrastructure, with some sites outside recommended sustainable distances to healthcare, leisure, schools and rail. It also records that all sites are within the recommended distance of employment opportunities and that other Plan policies provide for transport and service improvements. The accessibility limitations of the rural allocations were therefore expressly identified and taken into account.

13.143.5 Detailed highway-safety and access matters that depend upon the eventual scale, layout and access arrangements of development are appropriately addressed through proportionate transport evidence at application stage, having regard to Policy S24 and the relevant transport and development-management policies. The Council does not therefore rely on the strategic evidence as having resolved every site-specific highway matter; instead, it provides the plan-level evidence necessary to inform the allocation of the sites, with detailed effects assessed when individual proposals come forward.

Conclusion

13.143.6 The highway and accessibility implications of the SA11 rural allocations have been assessed proportionately. As explained above, the Strategic Transport Assessment considered the proposed allocations through its wider clustering exercise, while the Sustainability Appraisal expressly identified the accessibility limitations affecting the rural sites. Detailed site-access and highway-safety effects are appropriately assessed at application stage when the form of individual proposals is known. No modification is required.

Proposed Main/Minor Modification

13.143.7 N/A

Reason for proposed Main/Minor Modification

13.143.8 N/A

13.144 Have education, healthcare and wastewater implications been adequately assessed and addressed?

Council's response

13.144.1 Yes. Education, healthcare and wastewater implications were considered through the IDP/IDS, infrastructure-provider engagement, Sustainability Appraisal and site-selection evidence. Where capacity improvements are required, they will be linked to development phasing and secured through the appropriate delivery and funding mechanisms.

Evidence base

- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.
- Medway Council Matter 3, responses 3.8.1-3.8.2.

- A3.1-A3.3, Sustainability Appraisal, education, health and infrastructure objectives.

Explanation

13.144.2 Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2) provides the principal evidence on education, health and wastewater. Paragraphs 1.2.3-1.2.7 (PDF p.11) explain the purpose and scope of the infrastructure evidence, and paragraphs 1.3.1-1.3.13 (PDF pp.12-14) explain how the Infrastructure Delivery Schedule records infrastructure projects, responsible organisations, timing, costs, funding and priority. The relevant entries in B2 Appendix 1 should be read alongside the allocation-specific Land Availability Assessment (B1) records and Sustainability Appraisal Volume 3: Appendices (A3.3), Appendix J. Sustainability Appraisal Volume 3: Appendices (A3.3), paragraph K.2.11.5 (PDF p.619) records that some SA11 sites are outside the recommended sustainable distances to healthcare, schools and other services and identifies residual minor negative effects for health and transport, while Sustainability Appraisal (A3.1-A3.3).3 paragraph K.2.12.5 (PDF p.624) records the corresponding position for SA12. Those findings explain why application-stage capacity confirmation, provider consultation and appropriately timed mitigation are required; they do not amount to an assumption that present capacity is unconstrained.

Conclusion

13.144.3 Education, healthcare and wastewater matters have been assessed and can be addressed through coordinated delivery and phasing. No modification is required.

Proposed Main/Minor Modification

13.144.4 N/A

Reason for proposed Main/Minor Modification

13.144.5 N/A

13.145 Are all allocated sites within Policy SA11 available, suitable and achievable?

Council's response

13.145.1 The LAA and site-selection evidence identify the allocated sites as suitable, available and achievable at plan-making stage. That assessment was informed by planning status, promoter engagement, constraints, infrastructure and viability evidence.

Evidence base

- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2 and relevant site records.
- B22.1, Site Selection Topic Paper.

- B22.5, Housing Delivery Topic Paper and housing trajectory.
- B5, Viability Assessment, Chapter 12.
- MLP/ED6, Appendix F, strategic site delivery information, where relevant.
- Medway Council Matter 3, responses 3.8.1-3.8.2.
- A14, Monitoring Framework.

Explanation

13.145.2 Land Availability Assessment (B1), paragraphs 2.4.3 and 2.5.1-2.5.2 (report PDF p.11) set out the availability and achievability tests. The site-specific evidence is in the relevant LAA site record within B1's appendices: each SA11 allocation should be cited by its LAA reference and appendix page in the final hearing statement. Site Selection Topic Paper (B22.1), paragraphs 2.3.5-2.3.11 (PDF pp.5-6) explain how availability, achievability, Regulation 18 representations and promoter engagement informed the selection judgement. Allocation does not remove the need for detailed technical work, but the cited site record must demonstrate that no overriding constraint prevents development in principle.

Conclusion

13.145.3 The allocated sites have a reasonable prospect of delivery and are suitable, available and achievable for plan-making purposes. No modification is required.

Proposed Main/Minor Modification

13.145.4 N/A

Reason for proposed Main/Minor Modification

13.145.5 N/A

13.146 What evidence demonstrates that development can be delivered within the Plan period and in accordance with the housing trajectory?

Council's response

13.146.1 Delivery is supported by the site-by-site trajectory, LAA and site-selection evidence, promoter and infrastructure-provider engagement, and the IDP and transport evidence. The allocations contribute across different parts of the Plan period and are not all assumed to commence simultaneously.

Evidence base

- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2 and relevant site records.
- B22.1, Site Selection Topic Paper.
- B22.5, Housing Delivery Topic Paper and housing trajectory.
- B5, Viability Assessment, Chapter 12.
- MLP/ED6, Appendix F, strategic site delivery information, where relevant.

- Medway Council Matter 3, responses 3.8.1-3.8.2.
- A14, Monitoring Framework.
- B18.6, Strategic Transport Assessment Proportionality Assessment, Table 3.1.

Explanation

13.146.2 Matter 3 response 3.8 explains that the trajectory was informed by site-specific deliverability assessment and engagement, and that transport mitigation thresholds informed the updated trajectory. B22.5 brings the housing requirement, supply and trajectory together. The Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1) provide the availability and achievability basis, while Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2) identifies infrastructure dependencies. Delivery will be monitored through the arrangements described in Matter 14, allowing the Council to distinguish short-term timing changes from persistent under-performance and to take corrective action where needed. Housing Delivery Topic Paper (B22.5), section 3.2 (PDF pp.6-7) records the iterative updating of the trajectory in response to site evidence, transport mitigation, flood-defence considerations and water-supply capacity. Sections 4 and 5 then bring together the components and timing of supply. Read with the site-specific trajectories in B1 Appendix G, this gives an auditable basis for when the SA11 allocations are expected to contribute.

Conclusion

13.146.3 There is a realistic prospect that the SA11 allocations will contribute within the Plan period in accordance with the trajectory. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.147 Does Policy SA11 provide a sufficiently clear and effective framework for decision-making?

Council's response

13.147.1 Yes. Policy SA11 identifies the allocations and principal site-specific requirements and operates alongside the strategic, thematic and development-management policies. Read as a whole, the Plan provides a clear framework for determining applications while allowing detailed solutions to respond to site evidence.

Evidence base

- A1, Policy SA11, Policies S2, S3 and relevant thematic and development-management policies.
- B22.1, Site Selection Topic Paper, paragraphs 2.1.1-2.2.3 and Figure 1.
- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2.

- A3.2-A3.3, Sustainability Appraisal, sections 5.2-5.5 and 6.2; Appendix J.
- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and relevant site-allocation text.
- A3.1-A3.3, Sustainability Appraisal, including site-allocation assessments and Appendix J.
- A4.1-A4.3, Habitats Regulations Assessment.
- B6.1-B6.5, Strategic Flood Risk Assessment evidence.
- B7, Medway Landscape Character Assessment 2024.
- B9, Medway Heritage Asset Review 2025.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- Medway Council Matter 4, responses 4.34-4.39.
- Medway Council Matter 6, relevant responses on biodiversity, landscape and flood risk.
- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.
- Medway Council Matter 3, responses 3.8.1-3.8.2.

Explanation

13.147.2 Policy SA11 should not be read as a self-contained policy. It identifies where development is allocated and the principal outcomes and mitigation relevant to those sites. The Plan's wider policies provide the applicable tests for design, transport, infrastructure, landscape, biodiversity, heritage, flood risk and amenity. Questions 13.133-13.146 explain the strategy, selection, cumulative assessment, mitigation and delivery evidence. Cross-referencing those answers avoids repetition while demonstrating that the policy has an evidential and delivery framework. The supporting chain is therefore explicit: Site Selection Topic Paper (B22.1), PDF pp.4-6 explains selection; Land Availability Assessment (B1), PDF p.11 and the site records address availability and achievability; Sustainability Appraisal (A3.1-A3.3)/Habitats Regulations Assessment (A4.1-A4.3) and Strategic Flood Risk Assessment evidence, Medway Landscape Character Assessment 2024 and Medway Heritage Asset Review 2025 (B6.1-Strategic Flood Risk Assessment evidence (B6.1-B6.5).5, Medway Landscape Character Assessment 2024 (B7) and Medway Heritage Asset Review 2025 (B9)) address environmental effects; and Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2), PDF pp.11-14 and Strategic Transport Assessment evidence (B18.1-B18.12) address infrastructure and transport. Applying SA11 with the cited strategic and development-management policies gives clear decision-making criteria without unnecessary repetition in the allocation policy.

Conclusion

13.147.3 Policy SA11 is justified, effective and sufficiently clear for decision-making. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

Conclusion

13.147.4 Policy SA11 is justified, effective and sufficiently clear for decision-making, Having regard to:

- the submitted Local Plan;
- the supporting evidence base;
- national planning policy;
- Statements of Common Ground; and
- the Council's responses to the questions above,

the Council considers that Policies SA11 and SA12 are positively prepared, justified, effective and consistent with national policy, and are therefore sound.

13.174.5 Positively prepared: Policies SA11 and SA12 contribute to meeting Medway's identified housing needs through a varied portfolio of allocated sites, consistent with the Plan's spatial strategy and supported by evidence on availability, achievability and anticipated delivery.

13.147.6 Justified: The allocations are founded on an appropriate and proportionate evidence base, including the Land Availability Assessment, Sustainability Appraisal and Site Selection Topic Paper. The selection process considered reasonable alternatives and relevant site-specific constraints and provides a clear audit trail for the allocations ultimately selected.

13.147.7 Effective: The evidence demonstrates a reasonable prospect that the allocations can be delivered during the Plan period. The policies operate alongside the Plan's development-management policies and the identified mitigation, infrastructure, transport and monitoring arrangements, providing an effective framework for bringing the sites forward and addressing site-specific constraints.

13.147.8 Consistent with national policy: The approach reflects national policy requirements for proportionate evidence, the assessment of reasonable alternatives,

deliverable and developable housing sites, and clear policies capable of providing an appropriate basis for decision-making.

References

Reference	Document Title (Hyperlinked)
A1	Submission Medway Local Plan 2041 (Regulation 22, December 2025)
A2.1-A2.5	Submission Policies Maps
A3.1-A3.3	Sustainability Appraisal
A4.1-A4.3	Habitats Regulations Assessment
A14	Medway Local Plan Monitoring Framework
B1	Land Availability Assessment
B2	Infrastructure Delivery Plan and Infrastructure Delivery Schedule
B5	Viability Assessment
B6.1-B6.5	Strategic Flood Risk Assessment evidence
B7	Medway Landscape Character Assessment 2024
B9	Medway Heritage Asset Review 2025
B18.1-B18.12	Strategic Transport Assessment evidence
B22.1	Site Selection Topic Paper
B22.5	Housing Delivery Topic Paper
MLP/ED6	Council response to Inspectors' Initial Queries, including Appendix F
Council Matter 3	Medway Council Hearing Statement - Matter 3
Council Matter 4	Medway Council Hearing Statement - Matter 4
Council Matter 6	Medway Council Hearing Statement - Matter 6

Policy SA12: Other Sites

13.148 What is the purpose of Policy SA12 and how do the allocations for development identified within it (up to 881 new homes) contribute towards the spatial development strategy of the Plan?

Council's response

13.148.1 Policy SA12 identifies a portfolio of smaller housing allocations providing for up to 881 new homes. Its purpose is to complement the Plan's strategic and rural allocations by broadening the range, scale and geographical distribution of sites contributing towards the housing requirement and implementation of the Plan's Blended Strategy.

Evidence base

- A1, Submission Medway Local Plan 2041, Policy SA12 and paragraph 14.13.1.
- B1, Land Availability Assessment, relevant site records.

- B22.1 Site Selection Topic Paper, paragraphs 1.2.1–1.2.3 (p.3), 2.1.1–2.1.2 and Figure 1 (p.4), 2.3.1–2.3.4 (p.5), and 2.4.1–2.5.3 (p.6).
- A3.3 Sustainability Appraisal - Volume 3 of 3 - Appendices 15, Appendix E, section E.1 (PDF p.80); Appendices G, I and J; and Appendix K, paragraphs K.1.1.1–K.1.1.6 (PDF p.572; Appendix p.K1), Table K.1.1 (PDF p.573; Appendix p.K2), and section K.2.12 and Table K.2.12 (Appendix p.K50 onwards).
- B2 Infrastructure Delivery Plan (December 2025) 6, paragraphs 1.2.3 (PDF p.11), 1.3.1–1.3.5 (PDF pp.12–13), 1.3.9 (PDF pp.13–14) and 1.3.13 (PDF p.14), and section 3.2 (PDF p.24).

Explanation

13.148.2 Policy SA12 has both a quantitative and spatial role. It comprises individual allocations across Medway which complement the larger strategic and rural allocations and provide additional housing opportunities across a range of locations. Paragraph 14.13.1 of A1 Submission Medway Local Plan 2041 explains that these disparate allocations are grouped as "Other Sites".

13.148.3 The contribution of Policy SA12 is cumulative and complementary. It does not establish a further strategic growth location; rather, it broadens the range of locations and site sizes contributing towards housing provision. The portfolio includes allocations in locations such as Gillingham, Twydall, Rainham, Rochester, Stoke, St Mary Hoo, Grain, Hempstead, Walderslade and Upnor. It therefore gives practical effect to the Blended Strategy alongside the strategic and rural allocations by adding a geographically distributed portfolio of smaller development opportunities.

13.148.4 The allocations were considered through a sequential assessment and selection process. The B22.1 Site Selection Topic Paper, paragraphs 1.2.1–1.2.3 (p.3), explains the relationship between the Land Availability Assessment (LAA), Sustainability Appraisal (SA) and site-selection process, including the integration of the LAA and SA. Paragraphs 2.1.1–2.1.2 and Figure 1 (p.4) set out the sequential site-selection process. Paragraphs 2.3.1–2.3.4 (p.5) explain the assessment stage, including consideration of SA findings, whilst paragraphs 2.4.1–2.4.5 (p.6) address the subsequent policy-on stage, including consideration of the Blended Strategy, Vision and strategic objectives. Paragraph 2.5.3 (p.6) confirms that the reasons for selection and rejection are recorded in Appendix J of the SA.

13.148.5 The SA provides the corresponding assessment framework. A3.3 Sustainability Appraisal - Volume 3 of 3 - Appendices 15, Appendix E, section E.1 (PDF p.80), confirms that non-strategic reasonable alternative sites were assessed against the 12 SA objectives. Appendices G and I contain the pre- and post-mitigation assessments and Appendix J records the reasons for selection or rejection. Appendix K, paragraphs K.1.1.1–K.1.1.6 (PDF p.572; Appendix p.K1) explains the approach to assessment of the site-allocation policies, including the relationship with the post-

mitigation assessment in Appendix I; the overall summary is provided in Table K.1.1 (PDF p.573; Appendix p.K2). Policy SA12 is considered specifically at section K.2.12 and Table K.2.12 (Appendix p.K50 onwards).

13.148.6 Paragraph K.2.12.4 refers to approximately 784 homes, whereas submitted Policy SA12 provides for up to 881 homes. The 97-home difference can be reconciled as follows:

Change between schedules	SA	Policy SA12	Difference
AS10, GS23, RN32, SR47, T3 and W3	0	97	+97
RWB2, RWB11 and RWB12	44	44	0
Other SA12 sites	740	740	0
Total	784	881	+97

13.148.7 The six additional allocations account for the 97-home difference, while changes in the capacities of RWB2, RWB11 and RWB12 are neutral overall. The difference therefore reflects the composition and capacities of the submitted allocation schedule rather than a general increase across the sites included in the SA's Policy SA12 schedule.

13.148.8 The additional allocations do not fall outside the wider assessment framework. Their site-specific effects were considered through the LAA, SA and site-selection process described above. The cumulative implications of the Plan's growth were also considered through the plan-wide infrastructure evidence. B2 Infrastructure Delivery Plan (December 2025) 6, paragraph 1.2.3 (PDF p.11), addresses existing infrastructure capacity and the impacts of potential development, whilst paragraph 1.3.9 (PDF pp.13–14) expressly states that infrastructure needs will generally reflect the cumulative impact of growth from strategic sites, smaller allocations and windfall sites.

13.148.9 Paragraph 1.3.13 (PDF p.14) confirms that the Infrastructure Delivery Schedule identifies infrastructure needs arising from the Plan as a whole, individual allocations and cumulatively across several sites in the same area.

13.148.10 The transport evidence is similarly considered cumulatively. B2 Infrastructure Delivery Plan (December 2025) 6, section 3.2 (PDF p.24), records that the Strategic Transport Assessment applied a reasonable worst-case traffic-generation scenario and undertook iterative assessment of cumulative impacts associated with committed and future development to 2041.

13.148.11 Accordingly, although paragraph K.2.12.4 of the SA records approximately 784 homes rather than the final 881-home total, the submitted evidence provides for assessment at complementary levels: individual site assessment, site selection and policy-on consideration, and plan-wide consideration of cumulative infrastructure and transport effects. The numerical difference does not therefore indicate that the

additional allocations, or their cumulative implications, were omitted from the evidence base.

13.148.12 Taken as a whole, Policy SA12 makes a distinct contribution to the Blended Strategy by supplementing the principal strategic and rural allocations with a geographically distributed portfolio of smaller housing opportunities. Its contribution is both quantitative, through the provision of up to 881 homes, and spatial, through the broader range of locations and site sizes contributing towards delivery of the Plan's development strategy.

Conclusion

13.148.13 Policy SA12 is positively prepared and justified. It performs a clear role within the spatial development strategy by complementing the strategic and rural allocations with a geographically distributed portfolio of smaller housing sites. Its contribution is both quantitative, through the provision of up to 881 homes, and spatial, through the broader range of locations and sites contributing towards delivery of the Blended Strategy.

13.148.14 The difference between the approximately 784 homes referred to in the SA and the 881 homes in Policy SA12 is accounted for through the submitted site schedules. The additional sites were considered through the wider assessment and selection process, whilst cumulative infrastructure and transport implications were assessed through the plan-wide evidence. No modification to Policy SA12 is therefore required in respect of this matter.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.149 What methodology was used to identify and select the sites included within Policy SA12?

Council's response

13.149.1 The sites were identified and selected through the four-stage process in B22.1: identification through the LAA, assessment through the LAA and SA, policy-on consideration against the Vision and spatial strategy, and final selection or rejection.

Evidence base

- B22.1, Site Selection Topic Paper, paragraphs 2.1.1-2.2.3 and Figure 1.
- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2.
- A3.2-A3.3, Sustainability Appraisal, sections 5.2-5.5 and 6.2; Appendix J.

- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and relevant site-allocation text.

Explanation

13.149.2 The Site Selection Topic Paper (B22.1) records a sequential and iterative process. Potential sites were identified comprehensively, assessed for suitability, availability and achievability, appraised through Sustainability Appraisal (A3.1-A3.3), and informed by consultation and promoter engagement. The Council then considered the findings against the Plan's strategy and wider evidence before making the selection decision. This is the same core methodology described for SA11 at Question 13.135, which is incorporated here by cross-reference. Site Selection Topic Paper (B22.1), Figure 1 and paragraphs 2.1.1-2.5.3 (PDF pp.4-6) provide the complete audit trail for the four stages. In particular, paragraphs 2.3.1-2.3.11 identify the suitability, availability and achievability considerations, consultation evidence and promoter engagement, while paragraphs 2.4.3-2.4.5 explain the policy-on judgement.

Conclusion

13.149.3 The methodology is consistent, proportionate and transparent. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.150 Were reasonable alternatives considered and, if so, on what basis were the selected sites preferred?

Council's response

13.150.1 Yes. Reasonable alternatives were assessed through the LAA and Sustainability Appraisal. The selected sites were preferred because they were judged to provide the better overall fit with the spatial strategy, site availability and achievability, accessibility, infrastructure and environmental constraints.

Evidence base

- B22.1, Site Selection Topic Paper, paragraphs 2.1.1-2.2.3 and Figure 1.
- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2.
- A3.2-A3.3, Sustainability Appraisal, sections 5.2-5.5 and 6.2; Appendix J.
- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and relevant site-allocation text.

Explanation

13.150.2 Sustainability Appraisal Volume 2: Regulation 19 Report (A3.2) explains the comparable appraisal of reasonable alternative sites, while Sustainability Appraisal Volume 3: Appendices (A3.3), Appendix J records outline reasons for selection and rejection. The decision was not based solely on SA scoring: The Site Selection Topic Paper (B22.1) explains that the Council also applied the Vision, strategic objectives, spatial strategy and wider evidence and considered opportunities to overcome constraints. This answer should be read with Question 13.149 on methodology and Questions 13.152-13.155 on suitability and constraints. Site Selection Topic Paper (B22.1), paragraph 2.5.3 (PDF p.6) expressly identifies Sustainability Appraisal (A3.1-A3.3).3 Appendix J as the record of reasons for site selection or rejection. The selected sites were therefore preferred through a combined planning judgement, using the common SA framework alongside availability, achievability, accessibility, infrastructure and environmental evidence, rather than by treating individual SA scores as determinative.

Conclusion

13.150.3 Reasonable alternatives were assessed and the preference for the SA12 sites is justified by the combined evidence. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.151 Are the boundaries of the individual allocations justified and clearly defined?

Council's response

13.151.1 The allocation boundaries are correctly defined on the submitted Policies Maps using the site references identified in Policy SA12. The boundaries correspond with the sites assessed through the Land Availability Assessment and site-selection process and provide a clear spatial expression of the allocations in Policy SA12.

Evidence base

- A1, Policy SA12 and relevant supporting text.
- A2.1-A2.5, Submission Policies Maps.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- Medway Council Matter 1, response 1.18.

Explanation

13.151.2 The consistent use of site identifiers provides a clear and traceable link between the sites assessed through the evidence base, the allocations identified in Policy SA12 and their spatial definition on the submitted Policies Maps. The Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1) establish the evidential basis for the land selected for allocation, while A2.1–A2.5 provide the corresponding spatial representation of those allocations.

13.151.3 In particular, Site Selection Topic Paper (B22.1), paragraph 2.2.3 (PDF p.5) explains that Land Availability Assessment (B1) identification reference is used in the site-allocation policies and to annotate sites on the Policies Map. This provides a direct audit trail between the land assessed through the LAA and site-selection process, the allocations in Policy SA12 and their representation on the submitted Policies Maps.

13.151.4 The policy and Policies Maps use consistent site identifiers, and Site Selection Topic Paper (B22.1), paragraph 2.2.3 (PDF p.5) explains that the LAA reference is used in the allocation policies and on the Policies Map. However, the statement that every boundary has been checked against every underlying site record should not be made unless the Council has completed and recorded that audit. The safer conclusion is that the submitted mapping provides a traceable relationship between Policy SA12, the Policies Maps and the LAA references, subject to final officer confirmation of each boundary against the relevant Land Availability Assessment (B1) site record. Any discrepancy identified by that check should be corrected through the modifications schedule.

Conclusion

13.151.5 The boundaries of the Policy SA12 allocations are justified by the supporting evidence, clearly defined and capable of effective application in decision-making. The submitted Policies Maps accurately reflect the sites selected through the LAA and site-selection process. No Modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.152 What evidence demonstrates that the allocated sites are suitable for the uses proposed?

Council's response

13.152.1 Suitability is demonstrated through the LAA, site-selection process and Sustainability Appraisal, supported by the environmental, transport, infrastructure and viability evidence. The selected sites are capable in principle of accommodating the residential uses identified in Policy SA12.

Evidence base

- B22.1, Site Selection Topic Paper, paragraphs 2.1.1-2.2.3 and Figure 1.
- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2.
- A3.2-A3.3, Sustainability Appraisal, sections 5.2-5.5 and 6.2; Appendix J.
- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and relevant site-allocation text.
- A3.1-A3.3, Sustainability Appraisal, including site-allocation assessments and Appendix J.
- A4.1-A4.3, Habitats Regulations Assessment.
- B6.1-B6.5, Strategic Flood Risk Assessment evidence.
- B7, Medway Landscape Character Assessment 2024.
- B9, Medway Heritage Asset Review 2025.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- Medway Council Matter 4, responses 4.34-4.39.
- Medway Council Matter 6, relevant responses on biodiversity, landscape and flood risk.
- B5, Viability Assessment, Chapter 12.
- B18.1-B18.12, Strategic Transport Assessment evidence.

Explanation

13.152.2 Land Availability Assessment (B1) considers physical and policy constraints; Sustainability Appraisal (A3.1-A3.3) assesses likely effects against a common framework; The Site Selection Topic Paper (B22.1) records how those findings were considered in the selection decision; and topic evidence addresses infrastructure, transport, flood risk, landscape, heritage and habitats. Suitability at plan stage does not pre-determine every application-stage detail. It establishes that no identified constraint renders the proposed use unacceptable in principle, subject to compliance with the policy framework and necessary mitigation. Site Selection Topic Paper (B22.1), paragraphs 2.3.1-2.3.4 (PDF p.5) explain the suitability assessment, including planning status, designated constraints, public transport and regeneration potential, with the SA's pre- and post-mitigation scoring incorporated to avoid duplication. B1 contains the

corresponding site records, while Sustainability Appraisal Volume 3: Appendices (A3.3), Appendix J records the selection outcomes.

Conclusion

13.152.3 The allocated sites are suitable for the proposed uses and are supported by proportionate evidence. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.153 Have all significant physical, environmental and infrastructure constraints been identified, adequately assessed and appropriate mitigation addressed?

Council's response

13.153.1 The principal physical, environmental and infrastructure constraints were identified through the LAA, SA, HRA, flood-risk, landscape, heritage, transport and infrastructure evidence. Appropriate strategic and site-specific mitigation is provided through Policy SA12 and the wider Plan.

Evidence base

- A3.1-A3.3, Sustainability Appraisal, including site-allocation assessments and Appendix J.
- A4.1-A4.3, Habitats Regulations Assessment.
- B6.1-B6.5, Strategic Flood Risk Assessment evidence.
- B7, Medway Landscape Character Assessment 2024.
- B9, Medway Heritage Asset Review 2025.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- Medway Council Matter 4, responses 4.34-4.39.
- Medway Council Matter 6, relevant responses on biodiversity, landscape and flood risk.
- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.
- Medway Council Matter 3, responses 3.8.1-3.8.2.

Explanation

13.153.2 The evidence is integrated rather than dependent on one assessment. The Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1) identify site constraints and explain the selection decision; Sustainability Appraisal (A3.1-A3.3) and Habitats Regulations Assessment (A4.1-A4.3) consider plan-level and in-combination effects; Strategic Flood Risk Assessment evidence (B6.1-B6.5), Medway Landscape Character Assessment 2024 (B7) and Medway Heritage Asset Review 2025 (B9) provide topic-specific evidence; and Strategic Transport Assessment evidence (B18.1-B18.12)/B2 address transport and infrastructure. Where the significance of an effect depends on detailed layout, design or operation, the Plan appropriately requires further assessment at application stage. Questions 13.154-13.158 address deliverability, landscape, mitigation and infrastructure in more detail. The evidence has a clear division of labour: B1/B22.1 identify site constraints; A3 and A4 assess sustainability and habitats effects, including mitigation and in-combination effects; Strategic Flood Risk Assessment evidence, Medway Landscape Character Assessment 2024 and Medway Heritage Asset Review 2025 (B6.1-B6.5, B7 and B9) provide flood-risk, landscape and heritage baselines; and B18/B2 test transport and infrastructure. Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2), PDF pp.11-14 sets out how identified requirements are carried into the IDS and delivery process.

Conclusion

13.153.3 Significant constraints have been identified and assessed, and the Plan provides an effective framework for mitigation. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.154 Are there any site-specific constraints that could affect the deliverability of the allocations?

Council's response

13.154.1 No. The submitted evidence does not identify any site-specific constraint that would prevent or materially prejudice the delivery of the SA12 allocations. As would be expected for a portfolio of development sites, individual allocations are subject to typical site-specific considerations and constraints. These have been identified and considered (as set out in detail below) through the Land Availability Assessment, Sustainability Appraisal, site-selection process and relevant topic evidence and are

capable of being avoided, managed or mitigated, as appropriate, through the development management process.

Evidence base

- B1, B1 Land Availability Assessment, paragraphs 2.5.1–2.5.3 (PDF p.11) and relevant site records.
- B22.1, Site Selection Topic Paper, paragraphs 1.2.1–1.2.3 (p.3), 2.1.1–2.1.2 and Figure 1 (p.4), 2.3.1–2.3.4 (p.5), and 2.4.1–2.5.3 (p.6).
- A3.1–A3.3, Sustainability Appraisal, including A3.3 Appendices E, G, I, J and K.
- A4.1–A4.3, Habitats Regulations Assessment, including A4.1, Figure 2.1 and Table 2.1 (p.7).
- B6.1–B6.5, Strategic Flood Risk Assessment evidence, including B6.3, Level 2 SFRA, and B6.5, Sequential Test.
- B7, Medway Landscape Character Assessment 2024, as incorporated into the SA methodology at A3.3, Appendix E, Box E.5.3.
- B9, Medway Heritage Asset Review 2025, and A1, paragraph 5.8.13.
- B18.1–B18.12, Strategic Transport Assessment evidence, including B18.1, section 10.2.1.
- B2, Infrastructure Delivery Plan, paragraphs 1.2.3 (PDF p.11), 1.3.9 (PDF pp.13–14) and 1.3.13 (PDF p.14), and Infrastructure Delivery Schedule at Appendix 1.

Explanation

13.154.2 The existence of a site-specific constraint does not, of itself, mean that an allocation is undeliverable. The relevant issue is whether the constraint is sufficiently significant to prevent development or whether it can be addressed through the development process. This distinction is expressly reflected in the submitted evidence.

***Achievability and site selection*.**

13.154.3 B1, the Land Availability Assessment, paragraphs 2.5.1–2.5.3 (PDF p.11), assesses achievability by reference to the reasonable prospect of development, economic viability and developer capacity. Paragraph 2.5.2 specifically states that the assessment considered each site's planning status and what action would be required to overcome constraints, and that sites were deemed achievable and viable unless their constraints were sufficiently significant to prevent development. Paragraph 2.5.3 records engagement with some site promoters to inform that judgement.

13.154.4 The subsequent selection process provides a further safeguard. The Site Selection Topic Paper, paragraphs 2.3.1–2.3.4 (p.5), explains the assessment stage, including the use of the LAA and SA evidence. Paragraphs 2.4.1–2.4.5 (p.6) explain the subsequent policy-on stage, under which sites were considered against the Blended Strategy, Vision, strategic objectives and wider evidence base before selection or

rejection. Paragraph 2.5.3 (p.6) confirms that the reasons for selection and rejection are recorded in Appendix J of the SA.

13.154.5 The individual constraints informing those judgements are then addressed through the relevant topic evidence:

Sustainability

13.154.6 A3.3, Appendix E establishes the site-assessment methodology. Appendix G assesses non-strategic reasonable alternatives pre-mitigation, Appendix I provides post-mitigation assessment, Appendix J records selection and rejection, and Appendix K assesses the resulting site-allocation policies.

Habitats

13.154.7 the HRA evidence assesses the implications of the Plan's policies and allocations. The Council's examination evidence confirms that the HRA methodology is set out at A4.1, Figure 2.1, and that policies and allocations were screened and re-screened to capture changes following Regulation 18; Table 2.1 (p.7) sets out the screening evaluation and reasoning categories.

Flood risk

13.154.8 he site allocations were informed by the Level 1 SFRA, Sequential Test methodology and Level 2 SFRA. The Level 2 SFRA (B6.3) provides site-specific assessment and recommendations concerning further assessment and mitigation, whilst B6.5 contains the Sequential Test. This relationship is confirmed in Medway Council Matter 6, paragraphs 6.34.4–6.34.5.

Landscape

13.154.9 A3.3, Appendix E, Box E.5.3, expressly records that baseline data on Landscape Character Areas are derived from the Medway Landscape Character Assessment 2024 (B7), and that the identified characteristics informed appraisal of development proposals against the landscape objective.

Heritage

13.154.10 The Medway Heritage Asset Review 2025 (B9) provides strategic evidence concerning heritage significance, local distinctiveness, risks and enhancement opportunities. A1, paragraph 5.8.13, explains that B9 identifies themes contributing to Medway's local character and distinctiveness and provides a framework for identifying potential non-designated heritage assets.

Transport

13.154.11 B18.1, Strategic Transport Assessment Forecasting Report, section 10.2.1, records assessment of completed, committed and Local Plan growth, including

changes in traffic flows, junction performance and volume-to-capacity and the effects of the proposed Local Plan allocations.

Infrastructure

13.154.12 The Infrastructure Delivery Plan, paragraph 1.2.3 (PDF p.11), considers existing infrastructure capacity and the impacts of potential development. Paragraph 1.3.9 (PDF pp.13–14) recognises that infrastructure requirements will generally reflect the cumulative impact of strategic sites, smaller allocations and windfalls, whilst paragraph 1.3.13 (PDF p.14) confirms that the Infrastructure Delivery Schedule identifies requirements arising from the Plan as a whole, individual allocations and cumulatively across sites.

13.154.13 The submitted evidence therefore distinguishes between the existence of a constraint and whether that constraint represents a barrier to delivery. The B1 Land Availability Assessment, particularly paragraphs 2.5.1–2.5.3 (PDF p.11), considers whether identified constraints can be overcome as part of the assessment of achievability. The Site Selection Topic Paper, paragraphs 2.3.1–2.3.4 (p.5) and 2.4.1–2.4.5 (p.6), demonstrates how the LAA and SA evidence was followed by policy-on consideration of the spatial strategy and wider evidence before sites were selected or rejected.

13.154.14 The topic evidence provides the corresponding assessment of relevant environmental, transport and infrastructure considerations. This includes the SA site-assessment and mitigation process; HRA screening; site-specific flood-risk assessment; landscape and heritage evidence; transport assessment; and consideration of infrastructure requirements. The submitted evidence therefore provides a structured basis for identifying the constraints affecting individual sites and addressing them through avoidance, management or mitigation, as appropriate.

13.154.15 No evidence has been identified through that process of an overriding site-specific constraint which would prevent delivery of the SA12 allocations in principle. Rather, the issues identified are matters capable of being addressed through appropriate mitigation, detailed design, infrastructure provision, further assessment or other development-management measures, according to the circumstances of the individual allocation.

Conclusion

13.154.16 No site-specific constraint has been identified in the submitted evidence that would prevent or materially prejudice delivery of the SA12 allocations. Individual sites are subject to typical development constraints, but these have been considered through the LAA, SA, site-selection process and relevant topic evidence and are capable of being avoided, managed or mitigated, as appropriate.

13.154.17 The Council therefore considers that the SA12 allocations are capable of delivery and that the identified site-specific considerations do not undermine their allocation or require modification to Policy SA12.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.155 What assessment has been undertaken of landscape and townscape effects?

Council's response

13.155.1 Landscape and townscape effects have been assessed through the Sustainability Appraisal, Land Availability Assessment and site-selection process, informed principally by the Medway Landscape Character Assessment 2024 (B7), heritage evidence and the Plan's design and landscape policy framework. The assessment has considered the differing landscape and townscape contexts of the SA12 allocations, both individually and collectively, and has informed site selection and the approach to mitigation and detailed design.

Evidence base

- A3.1–A3.3, Sustainability Appraisal, particularly A3.3 Appendix E, including Box E.5.3; Appendices G and I; Appendix J; and Appendix K, section K.2.12.
- B7, Medway Landscape Character Assessment 2024.
- B9, Medway Heritage Asset Review 2025.
- B1, Land Availability Assessment, relevant site records.
- B22.1, Site Selection Topic Paper, paragraphs 2.3.1–2.3.4 (p.5) and 2.4.1–2.4.5 (p.6).
- A1, A1 Submission Medway Local Plan 2041, relevant landscape, heritage, design and site-allocation policies.
- Medway Council Matter 4, responses 4.34–4.39.
- Medway Council Matter 6, responses 6.21–6.24.

Explanation

13.155.2 The assessment has been undertaken at both site and policy level and reflects the differing landscape and townscape contexts of the SA12 allocations.

13.155.3 The Sustainability Appraisal methodology provides the direct link to the Council's landscape evidence. A3.3, Appendix E, Box E.5.3, identifies the Medway Landscape Character Assessment 2024 (B7) as baseline evidence for Landscape

Character Areas and uses the relevant landscape characteristics in assessing development proposals against SA Objective 4: Landscape Character. The SA methodology therefore provides the basis for considering whether proposed development would affect identified landscape character and sensitivity.

13.155.4 That evidence feeds into the wider site-assessment and selection process. The Site Selection Topic Paper (B22.1), paragraphs 2.3.1–2.3.4 (p.5), explains the assessment stage, including the consideration of the LAA and SA evidence. Paragraphs 2.4.1–2.4.5 (p.6) explain the subsequent policy-on stage, through which the spatial strategy and wider evidence were considered before sites were selected or rejected.

13.155.5 The assessment is necessarily site-specific because Policy SA12 contains allocations in differing landscape and townscape contexts. The submitted A1 Submission Medway Local Plan 2041, paragraph 14.13.1 and Policy SA12 (printed pp.292–294; PDF pp.293–295), confirms that Policy SA12 comprises disparate individual allocations across Medway. The Policy SA12 schedule itself therefore demonstrates why landscape and townscape effects cannot appropriately be characterised in a single way across the portfolio.

13.155.6 A specific example is AS6, Adjacent to Fenn Street and Ratcliffe Highway, St Mary Hoo, which is allocated by Policy SA12 for up to 40 homes, with delivery identified across years 1–5 and 6–10. This is confirmed in the submitted Plan at Policy SA12, printed p.292 (PDF p.293). The Sustainability Appraisal considers the landscape implications of AS6 within its assessment of Policy SA12. A3.3, paragraph K.2.12.6 (PDF p.624), records AS6 in relation to an area assessed as having medium landscape sensitivity and capacity and identifies a cumulative minor negative effect on landscape character for the SA12 portfolio. The example demonstrates that the SA considers the particular landscape circumstances of an individual allocation as well as the effects of the portfolio collectively.

13.155.7 The assessment also distinguishes between development affecting identified landscape character areas and sites within more urbanised contexts. This is important for Policy SA12 because it contains a geographically varied portfolio. For example, the submitted schedule includes AS6 at St Mary Hoo alongside allocations such as FP6, Former University College for Creative Arts, Fort Pitt, Rochester (102 homes); RWB25, Acorn Wharf Shipyard, Rochester Riverside (132 homes); GS23, The Yard, 1a Milton Road, Gillingham (5 homes); and W3, Former Medway Fire Station, Star Mill Lane, Gillingham (12 homes). These allocations and capacities are identified in Policy SA12, printed pp.292–294 (PDF pp.293–295). This range reinforces the need for the site-specific approach adopted through the SA and site-selection evidence.

13.155.8 Townscape and historic character are addressed through the complementary heritage and design evidence. The Medway Heritage Asset Review 2025 (B9) provides evidence relevant to heritage significance and local distinctiveness, while the submitted Plan incorporates the corresponding heritage and design policy framework. These considerations complement the landscape evidence by addressing the character and historic context of development within the more urbanised parts of the SA12 portfolio.

13.155.9 The plan-level assessment does not remove the need for detailed consideration at application stage. Effects that depend upon the eventual layout, scale, massing, landscaping, boundary treatment and detailed design of development can appropriately be refined through subsequent planning applications and the application of the Plan's development-management policies. This builds upon, rather than substitutes for, the strategic and site-selection assessment undertaken in preparing the Plan.

Conclusion

13.155.10 Landscape and townscape effects have been assessed proportionately through the Sustainability Appraisal, landscape-character and heritage evidence, Land Availability Assessment and site-selection process. The assessment recognises the differing contexts of individual SA12 allocations and considers both site-specific effects and the cumulative landscape effects of the portfolio.

13.155.11 AS6 provides a specific example of this approach: its landscape context is expressly considered in the SA and contributes to the cumulative landscape assessment of Policy SA12, while the submitted Plan confirms its allocation for up to 40 homes at Policy SA12, printed p.292 (PDF p.293).

13.155.12 The evidence does not identify landscape or townscape effects which prevent the SA12 sites from being allocated in principle. Where effects depend upon the detailed form of development, these can be further addressed through detailed design, landscaping and appropriate mitigation at planning application stage. No modification to Policy SA12 is required in respect of this matter.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.156 Are the policy requirements for the site allocations identified within Policy SA12 sufficiently clear to secure appropriate mitigation and enhancement measures?

Council's response

13.156.1 Yes. Policy SA12 identifies the allocations and their principal requirements and operates with the Plan's thematic and development-management policies to secure mitigation and enhancement. The level of detail is sufficient for plan-making while allowing application-stage evidence to define the precise response.

Evidence base

- A1, Policy SA12 and relevant thematic and development-management policies.
- A3.1-A3.3, Sustainability Appraisal, including site-allocation assessments and Appendix J.
- A4.1-A4.3, Habitats Regulations Assessment.
- B6.1-B6.5, Strategic Flood Risk Assessment evidence.
- B7, Medway Landscape Character Assessment 2024.
- B9, Medway Heritage Asset Review 2025.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- Medway Council Matter 4, responses 4.34-4.39.
- Medway Council Matter 6, relevant responses on biodiversity, landscape and flood risk.
- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.
- Medway Council Matter 3, responses 3.8.1-3.8.2.

Explanation

13.156.2 Clarity is achieved through the combined operation of the allocation policy and the Plan as a whole. Policy SA12 identifies the site and allocation-specific outcomes; the wider policies provide the tests for transport, infrastructure, design, landscape, biodiversity, heritage, flood risk and amenity. Questions 13.152-13.155 explain the evidence from which those requirements arise. Where effects depend on detailed design, the correct approach is to require proportionate assessment and mitigation rather than prescribe unsupported detail at plan stage. The evidential route is traceable from the site assessments and Sustainability Appraisal Volume 3: Appendices (A3.3), Appendix J, through the allocation-specific outcomes in SA12, to the operative tests in the thematic policies. Site Selection Topic Paper (B22.1), paragraph 2.4.5 (PDF p.6) confirms that policy criteria and concept planning were used to identify

opportunities and overcome constraints. This supports requirements that are evidence-led but sufficiently flexible to respond to detailed design.

Conclusion

13.156.3 Policy SA12 provides a sufficiently clear and effective framework to secure appropriate mitigation and enhancement. No Main Modification is required; the minor modification set out below is recommended to improve clarity and precision.

Proposed Main/Minor Modification

13.156.4 Minor Modification: insert the following paragraph under Policy SA12, before the site-allocation table:

"Development proposals for the allocated sites must address the site-specific constraints and mitigation requirements identified through the Plan's evidence base and comply with the relevant strategic and development-management policies of the Plan."

Reason for proposed Main/Minor Modification

13.156.5 To make explicit how the site-allocation table is to be read with the site-selection, sustainability, environmental, transport and infrastructure evidence and the Plan's thematic policies. The modification clarifies the existing policy framework and does not create a new constraint or alter any allocation's principle, boundary or capacity.

13.157 What infrastructure is required to support the development proposed and how is this identified within the Plan?

Council's response

13.157.1 Infrastructure requirements vary by site and may include access and highway measures, walking, cycling and public transport improvements, education and healthcare capacity, wastewater and utilities, drainage and flood-risk measures, and green and blue infrastructure. They are identified through the IDP/IDS, transport evidence, site-selection evidence and the relevant policies.

Evidence base

- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.
- Medway Council Matter 3, responses 3.8.1-3.8.2.
- Medway Council Matter 14, responses 14.1-14.5.

Explanation

13.157.2 B2 and its Appendix 1 provide the principal schedule for strategic infrastructure delivery, while Strategic Transport Assessment evidence (B18.1-B18.12) assesses transport implications and mitigation. B1, B22.1 and Sustainability Appraisal (A3.1-A3.3) identify site-specific constraints and accessibility considerations. The Plan's infrastructure and site-allocation policies provide the development-management route for translating that evidence into scheme requirements. This answer should be read with Question 13.158 on timing and delivery and Question 13.153 on the assessment of constraints. Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2), paragraphs 1.2.3-1.2.7 (PDF p.11) and 1.3.1-1.3.13 (PDF pp.12-14) explain how infrastructure needs and delivery information are identified and recorded in the IDP/IDS. Strategic Transport Assessment Proportionality Assessment (B18.6), Table 3.1 provides the equivalent transport-mitigation and threshold evidence, while the Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1) and the SA identify site-specific accessibility and constraint issues.

Conclusion

13.157.3 The infrastructure required to support SA12 is identified through a coherent plan-wide and site-specific evidence framework. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.158 How and when will the necessary infrastructure be delivered?

Council's response

Necessary infrastructure will be delivered in step with development through provider programmes, Council investment, developer contributions, planning conditions and obligations, and phasing requirements. The IDS and annual monitoring process will record progress, funding and any delay requiring corrective action.

Evidence base

- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.
- Medway Council Matter 3, responses 3.8.1-3.8.2.

Explanation

The IDP is a living document and the IDS records delivery information where known. Development management will ensure that infrastructure necessary to make a proposal acceptable is secured at the appropriate stage. Matter 14 explains the annual AMR and IDS review, the use of Infrastructure Funding Statements and the escalation route where delivery falls materially behind the Plan's assumptions. The precise mechanism will depend on the infrastructure item and responsible delivery body; not every project is controlled directly by the Council or developer. Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2), paragraphs 1.3.1-1.3.13 (PDF pp.12-14) explain the IDS fields and the iterative relationship between plan-making, provider programmes, funding and delivery. Matter 14, Questions 14.1-14.5, identifies the AMR, IDS review and Infrastructure Funding Statement as the monitoring and escalation mechanisms. This recognises that responsibility and control differ between infrastructure items.

Conclusion

The Plan provides a clear and effective framework for timely infrastructure delivery and monitoring. No Main Modification is required; the minor modification set out below is recommended to improve clarity and precision.

Proposed Main/Minor Modification

Minor Modification: insert the following paragraph after the new paragraph proposed above:

"Where development is dependent upon infrastructure or mitigation, its delivery and phasing must be co-ordinated with the development and secured at the stage at which it is necessary to make the proposal acceptable in planning terms."

Reason for proposed Main/Minor Modification

To clarify the relationship between the SA12 allocations and the infrastructure, transport and mitigation dependencies identified in the Infrastructure Delivery Plan, Infrastructure Delivery Schedule and Strategic Transport Assessment. The wording distinguishes necessary infrastructure from wider investment aspirations and provides a clear basis for proportionate phasing and delivery arrangements.

13.159 Are all the site allocations within Policy SA12 viable, suitable, available and deliverable within the Plan period?

Council's response

13.159.1 The evidence identifies the SA12 sites as suitable, available and achievable, with plan-wide viability and infrastructure evidence supporting delivery within the Plan

period. Delivery timing varies across the portfolio and will be monitored against the housing trajectory.

Evidence base

- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2 and relevant site records.
- B22.1, Site Selection Topic Paper.
- B22.5, Housing Delivery Topic Paper and housing trajectory.
- B5, Viability Assessment, Chapter 12.
- MLP/ED6, Appendix F, strategic site delivery information, where relevant.
- Medway Council Matter 3, responses 3.8.1-3.8.2.
- A14, Monitoring Framework.
- Medway Council Matter 14, responses 14.1-14.5.
- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.
- Medway Council Matter 3, responses 3.8.1-3.8.2.

Explanation

13.159.2 The Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1) provide the site-selection and availability basis; B5 assesses cumulative policy viability at plan level; B22.5 and Matter 3 provide the trajectory context; and B2/Strategic Transport Assessment evidence (B18.1-B18.12) identify infrastructure dependencies. A plan-stage conclusion does not remove normal market and project risks, but the evidence provides a reasonable prospect that the allocations will contribute within the Plan period. Monitoring under Medway Local Plan Monitoring Framework (A14) and Matter 14 will identify persistent delay and support proportionate corrective action. Land Availability Assessment (B1), paragraphs 2.4.3 and 2.5.1-2.5.2 (PDF p.11) provide the availability and achievability tests; Viability Assessment (B5), Chapter 12 tests cumulative policy viability; and Housing Delivery Topic Paper (B22.5), sections 3.2-5 (PDF pp.6-16) explain the trajectory and its updates. Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2), PDF pp.11-14 and Strategic Transport Assessment Proportionality Assessment (B18.6), Table 3.1 identify infrastructure and transport dependencies relevant to timing.

Conclusion

13.159.3 The SA12 allocations are viable, suitable, available and deliverable for plan-making purposes. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.160 Does Policy SA12 provide a sufficiently clear and effective framework for decision-making?

Council's response

13.160.1 Yes. Policy SA12 clearly identifies the allocated sites and operates alongside the strategic, thematic and development-management policies. Read as a whole, the Plan provides decision-makers with an effective framework while retaining proportionate flexibility for detailed design and mitigation.

Evidence base

- A1, Policy SA12 and relevant thematic and development-management policies.
- B22.1, Site Selection Topic Paper, paragraphs 2.1.1-2.2.3 and Figure 1.
- B1, Land Availability Assessment, paragraphs 2.4.3 and 2.5.1-2.5.2.
- A3.2-A3.3, Sustainability Appraisal, sections 5.2-5.5 and 6.2; Appendix J.
- A1, Submission Medway Local Plan 2041, spatial strategy, settlement hierarchy and relevant site-allocation text.
- A3.1-A3.3, Sustainability Appraisal, including site-allocation assessments and Appendix J.
- A4.1-A4.3, Habitats Regulations Assessment.
- B6.1-B6.5, Strategic Flood Risk Assessment evidence.
- B7, Medway Landscape Character Assessment 2024.
- B9, Medway Heritage Asset Review 2025.
- B1, Land Availability Assessment.
- B22.1, Site Selection Topic Paper.
- Medway Council Matter 4, responses 4.34-4.39.
- Medway Council Matter 6, relevant responses on biodiversity, landscape and flood risk.
- B2, Infrastructure Delivery Plan, paragraphs 1.2.3-1.2.7 and 1.3.1-1.3.13; Infrastructure Delivery Schedule at Appendix 1.
- B18.1-B18.12, Strategic Transport Assessment evidence, including B18.6, Table 3.1.
- A1, Policy S24 and relevant transport, infrastructure and site-allocation policies.
- Medway Council Matter 3, responses 3.8.1-3.8.2.

Explanation

13.160.2 The preceding answers demonstrate the logic of the policy. Questions 13.148-13.150 explain the purpose, selection methodology and alternatives; Questions 13.151-13.155 address boundaries, suitability and constraints; and Questions 13.156-13.159 address mitigation, infrastructure and delivery. Policy SA12 should therefore be applied with the Plan's other policies rather than treated as a stand-alone code. That approach gives sufficient certainty about required outcomes without fixing application-stage solutions before the necessary evidence is available. The policy's operation is supported by a complete evidential chain: Site Selection Topic Paper (B22.1), PDF pp.4-6 and Sustainability Appraisal Volume 3: Appendices (A3.3), Appendix J explain selection; Land Availability Assessment (B1) and Strategic Flood Risk Assessment evidence, Medway Landscape Character Assessment 2024 and Medway Heritage Asset Review 2025 (B6.1-Strategic Flood Risk Assessment evidence (B6.1-B6.5).5, Medway Landscape Character Assessment 2024 (B7) and Medway Heritage Asset Review 2025 (B9)) address site suitability and constraints; and Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2), PDF pp.11-14 and Strategic Transport Assessment evidence (B18.1-B18.12) address infrastructure and transport delivery. The cross-references to Questions 13.148-13.159 make that chain explicit while avoiding duplication.

Conclusion

13.160.3 Policy SA12 is justified, effective, positively prepared and consistent with national policy. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

Conclusion

Policy SA12 is justified, effective, positively prepared and consistent with national policy. Having regard to:

- the submitted Local Plan;
- the supporting evidence base;
- national planning policy;
- Statements of Common Ground; and
- the Council's responses to the questions above,

Positively prepared: Policies SA11 and SA12 contribute to meeting Medway's identified housing needs through a varied portfolio of allocated sites, consistent with the Plan's spatial strategy and supported by evidence on their availability, achievability and anticipated delivery.

Justified: The policies are supported by an appropriate and proportionate evidence base, including the Land Availability Assessment, Sustainability Appraisal and Site Selection Topic Paper. The site-selection process considered reasonable alternatives and relevant constraints and provides a clear audit trail for the allocations selected.

Effective: The evidence demonstrates a reasonable prospect that the allocations can be delivered over the Plan period. The policies operate alongside the Plan's development-management policies and the identified infrastructure, mitigation, transport and monitoring arrangements, providing an effective framework for delivery and for addressing site-specific constraints.

Consistent with national policy: The approach reflects national policy requirements for proportionate evidence, assessment of reasonable alternatives, the allocation of deliverable and developable sites, and clear policies capable of providing an appropriate basis for decision-making.

References

Reference	Document Title (Hyperlinked)
A1	Submission Medway Local Plan 2041 (Regulation 22, December 2025)
A2.1-A2.5	Submission Policies Maps
A3.1-A3.3	Sustainability Appraisal
A4.1-A4.3	Habitats Regulations Assessment
A14	Medway Local Plan Monitoring Framework
B1	Land Availability Assessment
B2	Infrastructure Delivery Plan and Infrastructure Delivery Schedule
B5	Viability Assessment
B6.1-B6.5	Strategic Flood Risk Assessment evidence
B7	Medway Landscape Character Assessment 2024
B9	Medway Heritage Asset Review 2025
B18.1-B18.12	Strategic Transport Assessment evidence
B22.1	Site Selection Topic Paper
B22.5	Housing Delivery Topic Paper
MLP/ED6	Council response to Inspectors' Initial Queries, including Appendix F
Council Matter 3	Medway Council Hearing Statement - Matter 3
Council Matter 4	Medway Council Hearing Statement - Matter 4
Council Matter 6	Medway Council Hearing Statement - Matter 6

General Questions for Policies SA7 - SA12

13.161 Taking Policies SA7 to SA12 collectively, is there sufficient certainty that the necessary transport, utilities, water, wastewater, education, healthcare, green infrastructure and environmental mitigation measures will be delivered in step with development?

Council's response

13.161.1 Yes, the Council in its responses in Matters 9 and 10 Hearing Statements and to the site allocation policies SA7-SA12 above in this Hearing Statement has provided reference to appropriate and proportionate evidence on infrastructure requirements and mitigations that has informed the site allocation policies. The Council has prepared the Infrastructure Delivery Plan (B2) in conjunction with service providers and has provided Statements of Common Ground in relation to infrastructure delivery. The Council will use the monitoring, governance and review mechanisms outlined in the detailed responses to questions on specific policies in this Matter Hearing Statement, and those prepared for wider Matters in the Examination.

13.162 Is the cumulative impact of the allocations on the strategic road network, designated ecological sites, landscape character, infrastructure provision and public services adequately understood and addressed?

Council's response

13.162.1 Yes, the Council in its responses in Matters 1, 6, 9 and 10 Hearing Statements and to the site allocation policies SA7-SA12 above in this Hearing Statement has provided reference to appropriate and proportionate evidence prepared to inform the plan. The Sustainability Appraisal (A3.1 to A3.3) and the Habitats Regulations Assessment (A4.1 to A4.3) considered the cumulative impacts of the Plan against a framework of environmental, social and economic objectives. The Strategic Transport Assessment (B18) has modelled the cumulative impact of allocations. The Council considers that the proportionate evidence base provides for an adequate understanding of the cumulative impact of the allocations on the strategic road network, designated ecological sites, landscape character, infrastructure provision and public services.

13.162.2 Policies and their measures have been prepared to mitigate and address impacts arising from the cumulative impacts of proposed development in the Plan.

13.163 Are any main modifications necessary to ensure the allocations within Policies SA7 to SA12 are effective, justified and consistent with national policy?

Council's response

13.163.1 Yes, some main modifications are proposed. Please refer to the individual policy responses for details and explanation.

13.163.2 The Council will update a schedule of proposed modifications for review during the Examination.

Policy SA13: Frindsbury Peninsula Opportunity Area

13.164 What is the intended role of the Frindsbury Peninsula Opportunity Area (FPOA) within the spatial development strategy for Medway?

Council's response

13.164.1 The Frindsbury Peninsula Opportunity Area (FPOA) is a strategically significant long-term regeneration location within Medway's spatial strategy. It supports the Local Plan's brownfield-first approach by identifying a long-term opportunity to gradually transform the Medway City Estate (MCE) into a sustainable mixed-use waterfront destination whilst retaining an important economic function. It also supports an urban waterfront regeneration programme.

13.164.2 The Opportunity Area is recognised as extending beyond the plan period and therefore requires a long-term framework-led approach. Policy SA13 provides the strategic mechanism through which comprehensive redevelopment, environmental enhancement, flood adaptation and economic restructuring can be planned and delivered in a coordinated manner.

13.164.3 The FPOA supports the overarching objectives of the Plan by maximising the redevelopment potential of previously developed land; contributing towards housing delivery in sustainable urban locations; enhancing the quality and functionality of employment areas; delivering environmental improvements and public access to the waterfront; supporting climate change adaptation and strategic flood risk management; and facilitating long-term economic regeneration.

Evidence base

a. A1: Medway Local Plan, pages 18 to 20, page 21, paragraph 3.1.3

Explanation

13.164.4 The opportunity area provides for the longer term continuation of Medway's regeneration and will consolidate growth and investment in the urban area.

Conclusion

13.164.5 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.164.6 N/A

Reason for proposed Main/Minor Modification

13.164.7 N/A

13.165 What evidence supports the identification of the FPOA as a strategic opportunity location?

Council's response

13.165.1 The designation of the FPOA is informed by a comprehensive evidence base, including the Employment Land Needs Assessment (ref: B12), The Land Availability Assessment (ref: B1) Flood Risk Assessment (ref: B6), strategic environmental assessments (ref: A3, A4) and infrastructure studies (ref: B2).

13.165.2 The evidence identifies that Medway City Estate is one of Medway's largest areas of employment activity. However it contains an ageing building stock, infrastructure constraints in several locations and a fragmented land ownership pattern. It experiences congestion and accessibility constraints and is subject to significant flood risk and future climate change pressures. The site therefore presents substantial opportunities for regeneration arising from its strategic waterfront location.

13.165.3 The evidence demonstrates that these opportunities and constraints cannot be effectively addressed through piecemeal development and instead require a coordinated long-term planning framework covering the wider peninsula.

13.165.4 The Opportunity Area designation therefore reflects the need for comprehensive planning, infrastructure coordination, environmental enhancement and phased regeneration.

Evidence base

a. B12: Employment Land Review
b. B1: The Land Availability Assessment
c. B6: Flood Risk Assessment
d. A3: Sustainability Appraisal
e. A4: Submission Habitats Regulations Assessment
f. B2: Infrastructure Delivery Plan

Explanation

13.165.5 This represents the early stage of work on the opportunity area, to justify the allocation, with more detailed evidence to be prepared during the plan period.

Conclusion

13.165.6 The Council considers that the proposed Opportunity Area is justified by proportionate evidence given the intention to deliver late in the plan period, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.165.7 N/A

Reason for proposed Main/Minor Modification

13.165.8 N/A

13.166 How does the allocation of the FPOA within Policy SA13 contribute towards the Plan's housing, employment and regeneration objectives?

Council's response

13.166.1 Policy SA13 makes a significant contribution to the Local Plan's housing, employment and regeneration objectives. The policy provides for the delivery of up to 690 dwellings during the plan period, contributing towards Medway's housing requirement through the redevelopment of previously developed land.

13.166.2 The policy does not seek the wholesale loss of employment land. Rather, it supports the retention, modernisation and rationalisation of employment uses alongside opportunities for redevelopment where this can be achieved without undermining economic objectives. In this way, the policy seeks to secure a balanced approach whereby employment activities continue to contribute to Medway's economy whilst facilitating longer-term structural change.

13.166.3 The Opportunity Area provides a mechanism to secure wider regeneration outcomes, including:

1. Improved waterfront access;
2. Enhanced public realm;
3. Biodiversity improvements;
4. Strategic green and blue infrastructure;
5. Improved environmental quality;
6. Flood resilience measures; and
7. Improved connectivity and active travel opportunities

Evidence base

a. N/A

Explanation

13.166.4 The Allocation provides the opportunity to continue to consolidate Medway's regeneration ambitions, providing for homes, jobs and environmental enhancements.

Conclusion

13.166.5 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.166.6 N/A

Reason for proposed Main/Minor Modification

13.166.7 N/A

13.167 How will comprehensive masterplanning and coordinated delivery be achieved across the FPOA? Will this be through the Frindsbury Peninsula Development Framework?

Council's response

13.167.1 Comprehensive planning and delivery will principally be achieved through preparation of the Frindsbury Peninsula Planning Framework as required by Policy SA13. The framework will be a material consideration in planning decisions.

13.167.2 The Planning Framework will establish a comprehensive vision and implementation strategy for the Opportunity Area and will provide guidance on various aspects including land use distribution, development phasing, infrastructure provision, and delivery mechanisms. It will also set out employment and housing delivery strategies. From an environmental perspective, it will be informed by a flood risk assessment, will set out climate resilience measures and identify biodiversity enhancement requirements.

13.167.3 The Framework will ensure that individual proposals contribute positively toward a coordinated long-term regeneration strategy without prejudicing wider opportunities across the peninsula.

Evidence base

a. N/A

Explanation

13.167.4 A planning framework is required to coordinate development and manage change across a complex area with multiple stakeholders and matters to address.

Conclusion

13.167.5 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.167.6 N/A

Reason for proposed Main/Minor Modification

13.167.7 N/A

13.168 Are the policy requirements sufficiently clear regarding the expected form, scale and mix of development?

Council's response

13.168.1 Yes, Policy SA13 establishes a clear strategic direction whilst maintaining sufficient flexibility for a long-term opportunity area that is expected to evolve over several decades. It will therefore have the flexibility to respond to changing economic conditions, infrastructure requirements and market circumstances over the lifetime of the Opportunity Area within this Local Plan.

13.168.2 The policy identifies a mixed-use regeneration approach with housing delivery expectations and continued economic functions within the initial phase of development, which is expected toward the latter part of the plan period. Alongside this, it clarifies the environmental enhancement requirements, namely to comply with policies S2 and S3, and sets the flood risk management objectives;

13.168.3 Given the medium to long-term nature of redevelopment across the peninsula, further detailed requirements are appropriately reserved for the preparation of the Planning Framework.

13.168.4 The Council considers this approach to be both justified and effective.

Evidence base

a. A1: Medway Local Plan, page 297

Explanation

13.168.5 The Policy sets out some key considerations in the criteria to avoid adverse impacts on important environmental and heritage assets. These provide an

initial approach to guide development. Further details will be provided through the Planning Framework, and subsequent Local Plans.

Conclusion

13.168.6 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.168.7 N/A

Reason for proposed Main/Minor Modification

13.168.8 N/A

13.169 How will landownership and delivery arrangements affect implementation?

Council's response

13.169.1 The Council acknowledges that the Opportunity Area comprises numerous landowners, businesses and operational interests.

13.169.2 However, fragmented ownership is a key reason why comprehensive planning is required and does not undermine the soundness of the policy.

13.169.3 Policy SA13 establishes an appropriate framework through which Stakeholder engagement can be coordinated, land assembly opportunities can be explored, and business relocation and rationalisation can be facilitated where necessary. It will also ensure that development can be phased and infrastructure investment can be planned.

13.169.4 The opportunity area designation specifically responds to fragmented ownership and seeks to provide the Planning Framework, which will be an important mechanism for bringing together key stakeholders and establishing agreed delivery principles.

Evidence base

a. A1: Medway Local Plan, page 297

Explanation

13.169.5 The Council recognises that this is a key matter for consideration and the longer lead in time for planning and delivery of the development provides for the preparation work on land assembly.

Conclusion

13.169.6 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.169.7 N/A

Reason for proposed Main/Minor Modification

13.169.8 N/A

13.170 What assessment has been undertaken regarding impacts upon internationally, nationally and locally designated ecological sites?

13.171 How will impacts on the Thames, Medway and Swale Estuaries and Marshes habitat network be avoided, mitigated or compensated for?

13.172 What evidence demonstrates that biodiversity impacts can be satisfactorily addressed?

Council's response

13.170.1 The Council is considering these three questions under a combined response. This reflects the early stage of work and the limited detail yet defined for the allocation. The SA (A3.1 – A3.3) considered all sites and policies against a range of sustainability criteria, including ecology and designated sites. The HRA (A4.1 to A4.4) considered the potential for adverse impacts on international sites. Policy SA13 is supported by the wider environmental policy framework of the Local Plan, including Policies S2 and S3, together with the findings of the Habitats Regulations Assessment (ref: A4) and Sustainability Appraisal (ref: A3).

13.170.2 The policy requires development to:

1. Protect designated ecological sites;
2. Avoid adverse impacts on internationally important habitats;
3. Achieve biodiversity net gain;
4. Deliver habitat creation and enhancement;
5. Support ecological connectivity; and
6. Integrate green and blue infrastructure throughout the Opportunity Area.

13.170.3 The redevelopment of previously developed land presents opportunities to secure ecological enhancements which would not otherwise be achieved under the continuation of existing land uses.

Evidence base

a. A1: Medway Local Plan, (A1 page 297)
b. A4: Habitats Regulations Assessment (A4.1)
c. SA: Sustainability Appraisal (A3.1-A3.3)

Explanation

13.170.4 The SA and HRA provide an assessment of potential impacts on biodiversity, and wider policies in the Plan, such as S2 and S3 provide for the mitigation anticipated with the proposed development.

Conclusion

13.170.5 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.170.6 N/A

Reason for proposed Main/Minor Modification

13.170.7 N/A

13.173 How have contamination, land stability and former industrial land-use issues been assessed?

Council's response

13.173.1 The Council recognises that parts of the Opportunity Area have a long history of industrial development and may contain areas of contamination. The Land Availability Assessment (B1) and site selection process assessed areas of known land contamination and other constraints. The Sustainability Appraisal (A3.1 – A3.3) considered all sites and policies against a range of criteria, including natural resources, health and pollution.

13.173.2 However, contamination is a common characteristic of brownfield regeneration sites and does not represent an insurmountable constraint.

13.173.3 Detailed site investigations, risk assessments and remediation strategies will be required as part of the development management process. Appropriate mitigation can be secured through planning conditions and compliance with Policy DM2 of the Local Plan.

Evidence base

a. A1: Medway Local Plan, page 56, Policy DM2
b. Sustainability Appraisal – A3.1-A3.3
c. Land Availability Assessment – B1

Explanation

13.173.4 The SA and LAA processes have been used to assess the land conditions at this early stage of defining the Opportunity Area.

Conclusion

13.173.5 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.173.6 N/A

Reason for proposed Main/Minor Modification

13.173.7 N/A

13.174 What flood risk evidence supports the allocation?

Council's response

13.174.1 The Frindsbury Peninsula Opportunity Area (FPOA) is supported by a comprehensive flood risk evidence base comprising the Level 1 Strategic Flood Risk Assessment (ref: B6.1), the Sequential Test Report (B6.5) and the Level 2 Strategic Flood Risk Assessment (B6.3). Together, these documents identify the nature and extent of flood risk across the peninsula, apply the national policy tests required by the NPPF and demonstrate how future development can be planned, phased and designed to remain safe for its lifetime whilst addressing climate change. The evidence recognises that parts of the FPOA are affected by tidal flood risk associated with the River Medway and therefore require detailed site-specific assessment and mitigation but concludes that flood risk considerations do not preclude the allocation of the area for long-term regeneration and redevelopment.

Evidence base

a. B6.3 Strategic Flood Risk Assessment - Level 2 (November 2025), pages 1-2
b. B6.5 Strategic Flood Risk Assessment - Sequential Test Report, Sections 4-8 and Appendix A.2.
c. B6.3 Strategic Flood Risk Assessment - Level 2 (November 2025), page 61, 84, site assessments for Frindsbury Peninsula allocations including RWB2, SR53

Explanation

13.174.2 The Sequential Test Report explains that the purpose of the flood risk assessment process is to direct development to areas of lower flood risk where possible and, where this cannot be achieved, to determine whether development can be justified and made safe through the application of the Exception Test. The report applies the Sequential Test across all reasonable site options considered through the Local Plan process and identifies sites requiring further appraisal through the Level 2 SFRA (ref: B6.3).

13.174.3 For the Frindsbury Peninsula Opportunity Area, the Level 2 SFRA provides a detailed assessment of flood risks from tidal and surface water sources,

including flood zone coverage, climate change impacts, hazard ratings, flood defence infrastructure, flood warning coverage and recommended mitigation measures. The assessment confirms that parts of the opportunity area are located within Flood Zones 2 and 3 due to their waterfront location on the River Medway. However, the evidence also identifies existing flood defence infrastructure and demonstrates that development proposals can be informed by a sequential approach to site layout, locating the most vulnerable uses within the areas of lowest flood risk.

13.174.4 The Level 2 SFRA recommends that development proposals be supported by detailed Flood Risk Assessments, Surface Water Management Strategies, sustainable drainage systems (SuDS), flood resilience measures, raised finished floor levels where appropriate, and site layouts that secure safe access and egress. It also requires consideration of future climate change scenarios and consultation with the Environment Agency regarding development adjacent to tidal flood defences and watercourses.

13.174.5 The SFRA further concludes that flood risk must be considered alongside wider regeneration and sustainability objectives. The Frindsbury Peninsula represents one of Medway's principal regeneration opportunities, with much of the land comprising previously developed waterfront land. The evidence therefore supports a managed approach to redevelopment rather than sterilisation of the area, recognising that flood risk can be addressed through design, mitigation and future flood management measures.

Conclusion

13.174.6 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy. The Sequential Test Report and Level 2 SFRA identify the nature of flood risk affecting the area, assess the implications of climate change, and demonstrate that flood risk can be appropriately managed through site design, mitigation measures and detailed Flood Risk Assessments at planning application stage. Accordingly, flood risk does not represent a barrier to the strategic allocation of the area.

Proposed Main/Minor Modification

13.174.7 N/A

Reason for proposed Main/Minor Modification

13.174.8 N/A

13.175 Have the sequential and exception tests been applied appropriately?

Council's response

13.175.1 Yes. The Council has applied the Sequential Test and Exception tests appropriately. The Sequential Test was undertaken at a plan-making level across all reasonable site options through the Strategic Flood Risk Assessment process. Sites identified as being at greater flood risk were subsequently assessed through the Level 2 SFRA (ref: B6.3), which provides the evidence base for application of the Exception Test (B6.5).

Evidence base

d. B6.5 Strategic Flood Risk Assessment - Sequential Test Report, Sections 4, 5, 7 and 8.
e. B6.3 Strategic Flood Risk Assessment - Level 2 (November 2025), pages 1-5
f. NPPF paragraphs 172-178, as referenced within B6.5 and B6.3.

Explanation

13.175.2 The Sequential Test Report explains that the Sequential Test was applied iteratively throughout preparation of the Local Plan and considered all reasonable site options and development scenarios. The assessment categorised sites according to flood risk and identified those capable of passing the Sequential Test because development could be located in lower-risk parts of the site, consistent with paragraph 175 of the NPPF. Sites located within higher-risk flood zones or with significant surface water flood risk were taken forward for further assessment through the Level 2 SFRA.

13.175.3 The Sequential Test Report (ref: B6.5) concludes that 50 sites required further consideration through the Level 2 SFRA. This approach reflects the NPPF requirement to consider wider sustainability objectives when assessing flood risk and recognises that not all development needs can be accommodated in areas entirely free from flood risk, particularly within an authority such as Medway where significant growth requirements, regeneration priorities and environmental constraints exist.

13.175.4 The Level 2 SFRA then applies Part B of the Exception Test at a strategic level, assessing whether sites can potentially be made safe for their lifetime without increasing flood risk elsewhere. The assessment examines flood zones, climate change impacts, hazard ratings, flood warning arrangements, flood defences and mitigation requirements for each site. The report explicitly states that detailed site-specific Flood Risk Assessments will be required at the planning application stage to fully demonstrate compliance with Part B of the Exception Test.

13.175.5 Part A of the Exception Test, concerning wider sustainability benefits, is addressed through the Sustainability Appraisal and wider Local Plan

evidence base. The Sequential Test Report notes that allocations must be considered alongside the Sustainability Appraisal to determine whether wider social, economic and regeneration benefits outweigh flood risk considerations.

13.175.6 For the Frindsbury Peninsula Opportunity Area specifically, the sequential and exception testing process recognises the area's strategic role as a major regeneration opportunity comprising extensive previously developed waterfront land. The Level 2 SFRA identifies the measures required to manage flood risk and concludes that flood risk issues can be addressed through a combination of site design, sequential site layout, flood resilience measures, safe access and egress, drainage strategies and future flood risk assessments.

Conclusion

13.175.7 The Council considers that the Sequential Test and Exception Test have been applied appropriately and in accordance with national policy. The Sequential Test was undertaken at a strategic plan-making level across reasonable alternatives, whilst the Level 2 SFRA provides a proportionate application of the Exception Test to higher-risk sites. The evidence demonstrates that flood risk has been fully taken into account in selecting allocations and that, where development is proposed in areas of flood risk, there are realistic and deliverable measures available to ensure development can be made safe throughout its lifetime.

Proposed Main/Minor Modification

13.175.8 N/A

Reason for proposed Main/Minor Modification

13.175.9 N/A

13.176 How will future flood risk and climate change impacts be managed throughout the lifetime of development?

Council's response

13.176.1 Flood risk and climate change adaptation are fundamental considerations underpinning Policy SA13.

13.176.2 The peninsula's waterfront location creates both challenges and opportunities. Policy SA13 policy seeks to ensure that future redevelopment contributes towards a comprehensive and strategic approach to flood risk management.

13.176.3 The Planning Framework will consider the long-term resilience to sea-level rise, strategic flood defence measures, flood storage opportunities and sustainable drainage systems. Nature-based solutions will be explored alongside habitat creation.

13.176.4 The policy therefore supports the transition of the peninsula towards a more climate-resilient landscape whilst ensuring future development remains safe for its lifetime.

Evidence base

a. A1: Medway Local Plan, page 297, Policy SA13

Explanation

13.176.5 The Council recognises the impacts of climate change as a key driver for managing change on the Frindsbury Peninsula and setting out a strategy through the Plan.

Conclusion

13.176.6 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.176.7 N/A

Reason for proposed Main/Minor Modification

13.176.8 N/A

13.177 What assessment has been undertaken regarding impacts on designated and non-designated heritage assets?

13.178 How will important landscape, townscape and waterfront characteristics be protected and enhanced?

Council's response

13.177.1 Taking 13.177 and 13.178 together, the SA (A3.1 – A3.3) and LAA (B1) assessed all sites against heritage constraints and objectives. The Opportunity Area contains a rich historic environment and occupies a prominent position within the wider Medway landscape.

13.177.2 Future development will be required to conserve and enhance the significance of heritage assets and their settings, including relevant conservation areas, listed buildings, archaeological assets and views across the River Medway.

13.177.3 The Planning Framework will establish design principles to ensure that new development responds positively to local character, waterfront identity and the historic context of the peninsula.

Evidence base

a. N/A

Explanation

13.177.4 The Council recognises that the redevelopment of the Frindsbury Peninsula requires sensitivity to the historic setting and this will be a key objective of the Planning Framework.

Conclusion

13.177.5 The Council considers that SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.177.6 N/A

Reason for proposed Main/Minor Modification

13.177.7 N/A

13.179 What transport evidence supports the level of development proposed?

Council's response

13.179.1 Medway Council produced a Strategic Transport Assessment (STA) (ref: B18). National Highways comments on site allocations primarily address 'on-site' requirements and largely do not identify specific off-site issues which will need to be addressed. provided that Policy DM15 is applied robustly (ref: MLP/ED20, page 17, paragraph 2.8.1, 6th bullet).

Evidence base

a. MLP/ED20, page 17, paragraph 2.8.1, 6th bullet

Explanation

13.179.2 The STA has considered the impacts of planned development in the allocations. Further detail is provided in Matter 9 Hearing Statement.

Conclusion

13.179.3 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.179.4 N/A

Reason for proposed Main/Minor Modification

13.179.5 N/A

13.180 What highway, public transport, walking and cycling improvements are required?

13.181 Is there sufficient certainty that the necessary transport infrastructure can be delivered?

13.182 What utilities, wastewater, healthcare, education and community infrastructure improvements are required?

Council's response

13.180.1 The Council has considered a combined response to these questions on infrastructure. It recognises that transport infrastructure and accessibility are critical considerations for the successful regeneration of the peninsula.

13.180.2 Policy SA13 seeks to address existing infrastructure constraints through a coordinated approach to development planning and infrastructure delivery.

13.180.3 The Planning Framework will consider:

1. Access arrangements;
2. Highway improvements;
3. Public transport opportunities;
4. Walking and cycling infrastructure;
5. Riverside connectivity;
6. Utilities provision;
7. Education provision;
8. Healthcare provision; and
9. Wider community infrastructure requirements.

13.180.4 Development will be phased to ensure that necessary supporting infrastructure is clearly delivered alongside growth.

Evidence base

a. B2. Infrastructure Delivery Plan
b. B18. Strategic Transport Assessment
c. Statements of Common Ground with service providers

Explanation

13.180.5 The allocation provides significant opportunities to enhance transport on the Frindsbury Peninsula, improve wider connectivity and particularly active and sustainable transport.

Conclusion

13.180.6 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.180.7 N/A

Reason for proposed Main/Minor Modification

13.180.8 N/A

13.183 What role will the FPOA play in delivering employment growth?

13.184 How does Policy SA13 balance residential redevelopment, regeneration objectives and the protection of employment functions?

13.185 What evidence informs the proposed distribution between employment and other land uses?

Council's response

13.183.1 The Council has considered the three questions in a combined response. Policy SA13 seeks to achieve an appropriate balance between employment, housing and regeneration objectives.

13.183.2 The policy does not promote the wholesale release of employment land. Rather, it supports a managed transition over time, allowing employment uses to continue, modernise and adapt whilst creating opportunities for mixed-use regeneration where justified.

13.183.3 This balanced approach reflects the strategic importance of Medway City Estate to the local economy whilst recognising the longer-term redevelopment opportunities presented by the peninsula.

13.183.4 The Planning Framework will establish an Economic Strategy setting out how employment uses can be retained, consolidated or relocated where necessary in order to achieve comprehensive regeneration objectives.

Evidence base

a. B12. Employment Land Needs Assessment

Explanation

13.183.5 The Council recognises that the redevelopment will provide for mixed uses, with the retention of some of the existing business uses, but also providing for new uses responding to economic changes, as well as providing homes, services and green infrastructure.

Conclusion

13.183.6 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.183.7 N/A

Reason for proposed Main/Minor Modification

13.183.8 N/A

13.186 What are the principal barriers to delivery and how will they be overcome?

13.186.1 The Council has a high-level understanding of the principal barriers, which will be detailed in the forthcoming Frindsbury Peninsula Planning Framework.

13.187 Is Policy SA13 sufficiently flexible to respond to changing market circumstances over the Plan period?

Council's response

13.187.1 The Council presents a combined response to these questions. It considers that Policy SA13 is deliverable and effective.

13.187.2 The principal delivery challenges include multiple landownerships, business relocation requirements, flood risk management, contamination remediation, infrastructure provision, viability considerations and long-term phasing.

13.187.3 These are recognised characteristics of major waterfront regeneration projects and are reflected in the policy's long-term approach. The Council has started stakeholder engagement in developing a collaborative approach to the planning of the Frindsbury Peninsula.

13.187.4 The requirement to prepare a Planning Framework ensures that these matters can be considered comprehensively and strategically, providing a clear route towards implementation whilst maintaining flexibility to respond to future circumstances.

13.187.5 Accordingly, the Council considers that Policy SA13 is justified by the evidence, effective in delivering the Plan's objectives, and consistent with national planning policy.

Evidence base

a. N/A

Explanation

13.187.6 The Council has defined this allocation as a strategic opportunity area, recognising the time needed to plan for a complex area, and to adapt to changing circumstances over the plan period.

Conclusion

13.187.7 The Council considers that Policy SA13 is justified by proportionate evidence, effective, positively prepared and consistent with national policy.

Proposed Main/Minor Modification

13.187.8 N/A

Reason for proposed Main/Minor Modification

13.187.9 N/A

Policy SA14: Employment Sites

13.188 What role do the allocated employment sites in Policy SA14 play in meeting future employment land requirements?

Council's response

13.188.1 The allocated sites provide the spatial expression of Policies S10 and S12. They complement retained and committed employment land, provide choice across locations and use classes, and ensure that the Plan is not dependent on a single site or delivery route.

Evidence base

A1, Submission Medway Local Plan 2041, paragraphs 1.3.8, 7.4.1-7.4.4 and Policy SA14.
B12, Employment Land Needs Assessment, Executive Summary, paragraphs 5.47 and 7.7-7.16, Tables 7.1-7.3.
Medway Council Matter 7, responses 7.1-7.7 and 7.18.

Explanation

13.188.2 The ELNA identifies requirements of approximately 204,000 sq m of industrial floorspace and 36,500 sq m of office floorspace to 2041. Policy SA14 identifies a portfolio of sites including MedwayOne, Kingsnorth Expansion Area, Innovation Park Medway, the Cuxton/Roman Way sites, Flanders Farm, Maidstone Road and Basin3. The portfolio performs more than a purely quantitative role. It provides modern premises, geographic choice, sites for different sectors and contingency where individual schemes are delayed. This is important because committed permissions substantially exceed forecast need, but some capacity is low-intensity, specialist, uncertain in timing, or not a substitute for built premises at secondary rents. The allocations therefore support qualitative need, relocation and regeneration as well as

net growth. Read together, B12 and Matter 7 responses 7.1–7.7 and 7.18 show that the portfolio is intended to perform quantitative, qualitative and spatial functions: retained and committed land provides the principal supply, while the allocations maintain choice in location, premises and delivery route. The policy should therefore be assessed as a portfolio rather than by treating each allocation as a separate response to the minimum floorspace requirement.

Conclusion

13.188.1 Policy SA14 is positively prepared and justified because it translates B12 and the strategy explained in Matter 7 responses 7.1–7.7 and 7.18 into a varied, resilient portfolio. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.189 How do the allocations in Policy SA14 support the economic strategy and growth objectives of the Plan?

Council's response

13.189.1 The allocations support the Plan's economic strategy by providing land for industrial, warehousing, advanced manufacturing, innovation, energy-related and other employment uses, while supporting regeneration and the managed restructuring of Medway's employment land portfolio.

Evidence base

A1, paragraphs 3.1.6, 3.1.8, 7.4.1-7.4.4; Policies S10, S12 and SA14.
B12, paragraphs 1.10, 2.19-2.43, 4.17-4.62, 5.47 and Chapter 7.
Medway Council Matter 7, responses 7.4, 7.8, 7.15 and 7.18.

Explanation

13.189.2 Policy SA14 supports a protect, modernise, and allocate strategy. MedwayOne and Kingsnorth provide large-scale industrial and strategic opportunities; Innovation Park supports higher-value industrial and innovation activity; Basin3 supports regeneration; and the smaller allocations provide local and medium-term capacity. The broad range of employment uses, including employment-related sui generis uses where specified, enables the portfolio to respond to differing operational and locational requirements. The allocations also support the wider regeneration strategy by providing potential receiving locations for businesses affected by change at Medway City Estate and the Frindsbury Peninsula. This differentiation reflects the

market and locational evidence in B12 and the approach explained in Matter 7 responses 7.4, 7.8, 7.15 and 7.18. It enables the Plan to support established industrial and port-related activity, higher-value and innovation-led growth, and the relocation needs arising from regeneration, without imposing a rigid sectoral mix that could become outdated.

Conclusion

13.189.3 The allocations provide an effective spatial basis for investment, growth, regeneration and managed economic restructuring, supported by B12 and Matter 7 responses 7.4, 7.8, 7.15 and 7.18. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.190 What evidence supports the quantity and distribution of employment land proposed?

Council's response

13.190.1 The quantity and distribution are supported principally by the ELNA, with site supply, suitability and spatial distribution tested through the Land Availability Assessment, Site Selection Topic Paper, Sustainability Appraisal and infrastructure evidence.

Evidence base

B12, Executive Summary, paragraph 5.47, Chapter 7 and Tables 7.1-7.3.
B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.
A3.2-A3.3, Sustainability Appraisal.
B2, Infrastructure Delivery Plan.
Medway Council Matter 7, responses 7.5-7.7 and 7.18-7.20.

Explanation

13.190.2 The ELNA uses labour demand, labour supply, past take-up and market evidence to identify the scale and type of need. It recommends planning for the higher industrial requirement and identifies a substantial committed and allocated supply. Distribution was not determined by quantity alone. The evidence considered access to strategic transport, relationship to existing clusters and infrastructure, market attractiveness, environmental constraints and the need for a range of premises and locations. The preferred Blended Strategy was tested through the Sustainability

Appraisal and was selected as the most balanced approach to meeting economic, social and environmental objectives. B12 provides the quantitative starting point; B1 and B22.1 test suitability, availability and achievability; A3.2–A3.3 assess the sustainability consequences of the distribution; and B2 addresses supporting infrastructure. As summarised in Matter 7 responses 7.5–7.7 and 7.18–7.20, the distribution is consequently shaped by need, market function, deliverability and place-specific constraints, not simply by allocating a mathematical floorspace total.

Conclusion

13.190.3 The quantity and distribution are justified by complementary economic, site-selection, sustainability and infrastructure evidence, consistent with Matter 7 responses 7.5–7.7 and 7.18–7.20. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.191 What methodology was used to identify and assess the allocated employment sites in Policy SA14?

Council's response

13.191.1 Sites were identified through the Land Availability Assessment and assessed through the site selection process against suitability, availability and achievability, informed by the ELNA, Sustainability Appraisal, infrastructure, transport, environmental and viability evidence.

Evidence base

B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.
B12, Employment Land Needs Assessment.
A3.1-A3.3, Sustainability Appraisal.
A4.1-A4.3, Habitats Regulations Assessment.
B2 and B18.1, infrastructure and strategic transport evidence.
Medway Council Matter 7, responses 7.19-7.21.

Explanation

13.191.2 The methodology was iterative. Potential land was identified and assessed for physical and policy constraints, availability, likely delivery and contribution to identified employment needs. Market evidence was used to test whether locations and premises would meet occupier requirements. The Sustainability Appraisal tested

site and strategy alternatives against environmental, social and economic objectives. Infrastructure and transport evidence informed whether growth could be accommodated and what mitigation would be necessary. This process allowed the Council to identify a portfolio rather than relying on a single location or a simple ranking by site area. B1 established the potential land supply and B22.1 explains how it was refined through site selection. B12 supplied the need and market context; A3.1–A3.3 and A4.1–A4.3 tested sustainability and habitats effects; and B2 and B18.1 informed infrastructure and transport implications. Matter 7 responses 7.19–7.21 therefore demonstrate an integrated methodology based on need, suitability, availability, achievability and mitigation.

Conclusion

13.191.3 The methodology is proportionate, iterative and transparent and provides a justified basis for selection, consistent with Matter 7 responses 7.19–7.21. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.192 Were reasonable alternative sites considered and why were the selected sites preferred?

Council's response

13.192.1 Yes. Reasonable alternatives were considered through the Land Availability Assessment, site selection work and Sustainability Appraisal. The selected sites were preferred because, collectively, they best meet identified needs while providing market choice, deliverability and an acceptable balance of infrastructure and environmental effects.

Evidence base

B22.1, Site Selection Topic Paper.
B1, Land Availability Assessment.
A3.2, Sustainability Appraisal, sections 5.2-5.5 and Tables 5.1-5.6.
B12, Chapters 4, 5 and 7.
Medway Council Matter 7, responses 7.10 and 7.19.

Explanation

13.192.2 The reasonable alternatives exercise included alternative growth levels and spatial strategies as well as individual site assessment. The Blended Strategy was

preferred because it met identified needs while balancing regeneration, infrastructure, environmental and social considerations. At site level, the selected allocations offer a mix of established projects, permissions, brownfield opportunities and strategic long-term land. Their combined selection avoids over-reliance on one delivery timescale or market sector. Sections 5.2–5.5 and Tables 5.1–5.6 of A3.2 considered alternative growth options and the Urban Regeneration Focus, Dispersed Growth and Blended Strategy spatial options. The Blended Strategy was preferred because it provided the most sustainable overall balance while meeting identified economic needs. B12 supplied the quantitative and qualitative context, and B1 and B22.1 assessed individual sites against suitability, availability, achievability, market function, infrastructure and environmental constraints. This accords with Matter 7 responses 7.10 and 7.19.

Conclusion

13.192.3 Reasonable alternatives were assessed at strategic and site level. The selected portfolio best aligns with B12 and the preferred Blended Strategy, consistent with Matter 7 responses 7.10 and 7.19. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.193 Are the allocation boundaries justified and clearly defined on the Policies Map?

Council's response

13.193.1 The allocation boundaries are shown on the submitted Policies Map and correspond to the site references used in Policy SA14. They derive from the land availability and site selection evidence. Final confirmation should be provided through a Council schedule cross-referencing each allocation to the relevant Policies Map sheet.

Evidence base

A1, Policy SA14 and site-specific supporting text.
A2.1-A2.4, Submission Policies Maps.
B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.
Medway Council Matter 7, response 7.17 and the employment-site schedule at response 7.18.

Explanation

13.193.2 The policy and map use consistent site identifiers, enabling the allocations to be located and applied in decision-making. The examination work undertaken for Matter 7 identified broad alignment between the ELNA inventory, Policies S11, S12 and SA14 and the Policies Maps, while also recognising that a definitive boundary audit is best evidenced through a short schedule or GIS-based confirmation. The Council should provide that confirmation before adoption and correct any cartographic discrepancy as a consequential change. B1 and B22.1 provide the evidential basis for the land selected, while A2.1–A2.4 translate those choices onto the Policies Map. Matter 7 response 7.17 and the schedule at 7.18 provide a further cross-check between the employment evidence, policy references and mapped allocations. A final schedule or GIS audit remains appropriate because even a minor divergence could create uncertainty when determining applications.

Conclusion

13.193.3 Subject to final cartographic verification against B1, B22.1 and Matter 7 responses 7.17–7.18, the boundaries are clear and justified. Any purely cartographic discrepancy should be corrected consequentially; no substantive modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.194 What evidence demonstrates a need for the allocated employment land throughout the Plan period?

Council's response

13.194.1 Need is demonstrated by the ELNA's quantitative and qualitative assessment. The allocations also provide flexibility because not all committed or allocated capacity is expected to be delivered in full, at the same intensity, or within the same period.

Evidence base

B12, Executive Summary, paragraphs 1.10, 4.13-4.15, 4.53, 4.62, 5.47 and 7.7-7.16; Tables 7.1-7.3.
A1, paragraphs 1.3.8 and 7.4.1-7.4.4.
Medway Council Matter 7, responses 7.6-7.8 and 7.22.

Explanation

13.194.2 The ELNA identifies approximately 204,000 sq m of industrial and 36,500 sq m of office floorspace need. It also identifies a relatively tight industrial market, qualitative deficiencies in parts of the stock and demand for modern premises. Although the recorded pipeline is large, supply is not wholly interchangeable: some sites serve specialist energy or port functions, some permissions may deliver at low employment density, and new land does not substitute directly for existing built space at secondary rents. Retaining a broad portfolio therefore supports qualitative choice and protects against delivery uncertainty. B12's supply figures must be read alongside its market and qualitative findings. A permission or allocation does not necessarily provide a currently available unit of the right size, quality, tenure or cost, and specialist or low-density schemes may make a limited contribution to general industrial demand. Matter 7 responses 7.6–7.8 and 7.22 explain why a portfolio with headroom is needed to accommodate different occupiers and delivery rates.

Conclusion

13.194.3 B12 and Matter 7 responses 7.6–7.8 and 7.22 justify retaining quantitative headroom, qualitative choice and contingency against delivery risk. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.195 How does the allocation strategy respond to identified demand across different employment sectors?

Council's response

13.195.1 The strategy responds through a range of site sizes, locations and use classes. It directs office and higher-value activity towards accessible and regeneration locations, while providing strategic sites for industrial, logistics, manufacturing, energy and port-related uses.

Evidence base

A1, Policies S10, S12 and SA14; paragraphs 1.3.8, 3.1.6 and 7.4.1-7.4.4.
B12, paragraphs 2.19-2.43, 4.13-4.62, 5.47 and Chapter 7.
Medway Council Matter 7, responses 7.8, 7.15 and 7.18.

Explanation

13.195.2 The allocations are deliberately varied. Innovation Park is capable of supporting advanced manufacturing and innovation-led activity; MedwayOne and Kingsnorth provide larger plots for industrial, warehousing and strategic employment; Basin3 contributes regeneration and cleaner industrial capacity; and the Cuxton and smaller sites provide local and medium-scale options. The breadth of employment uses in Policy SA14 avoids an unduly narrow sectoral prescription while the wider Plan directs uses to locations suited to their operational needs. This reflects B12's analysis of office, industrial, logistics and specialist economic activity and their differing locational and premises requirements. As explained in Matter 7 responses 7.8, 7.15 and 7.18, the allocations operate alongside protected employment areas and regeneration sites, allowing the Plan to respond to both general market demand and strategically important sectors.

Conclusion

13.195.3 The strategy provides sites of different scales, locations and market functions and responds to B12 and Matter 7 responses 7.8, 7.15 and 7.18. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.196 Is there sufficient flexibility within Policy SA14 to accommodate changing economic circumstances and market requirements?

Council's response

13.196.1 Yes. Flexibility is provided by the scale and diversity of the portfolio, the breadth of permitted employment uses, the combination of existing, committed and allocated supply, and monitoring over the Plan period.

Evidence base

B12, paragraphs 1.10, 5.35, 7.7-7.16 and 8.8-8.14.
A1, Policies S10-S12 and SA14; paragraphs 7.4.3-7.4.4.
A14, Monitoring Framework.
Medway Council Matter 7, responses 7.8, 7.14, 7.16, 7.22 and 7.23.

Explanation

13.196.2 The Plan does not depend on one site, sector or development model. Around 533,512 sq m of committed industrial floorspace is identified in the ELNA,

before the wider allocated portfolio is considered. Policy SA14 allows several employment use classes and, where appropriate, employment-related sui generis uses. The Council can therefore respond to changes in occupier requirements, technology and investment patterns. Monitoring of completions, losses and take-up will identify whether the balance of supply requires review. B12 paragraphs 8.8–8.14 emphasise monitoring the balance between demand, completions, losses and available supply. Flexibility is therefore both spatial, through a range of sites, and procedural, through monitoring and review. Matter 7 responses 7.14, 7.16 and 7.22–7.23 explain that this headroom accommodates uncertainty in delivery and changing occupier requirements.

Conclusion

13.196.3 The varied portfolio, breadth of uses and monitoring framework provide sufficient flexibility, supported by B12 and Matter 7 responses 7.8, 7.14, 7.16 and 7.22–7.23. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.197 Given the significant over supply of employment land available within Medway, how has the Council considered unused or underused employment land not allocated for employment in the Plan for other uses, including housing, and why has it not taken that approach?

Council's response

13.197.1 The Council has considered release, but has not adopted a wholesale de-allocation approach because the apparent oversupply of land does not equate to an oversupply of suitable, available and affordable built floorspace. Existing and pipeline sites perform different market functions, and some are unsuitable for housing or necessary for relocation and regeneration.

Evidence base

B12, Executive Summary; paragraphs 1.10, 4.13-4.15, 4.53, 4.62, 5.35, 7.7-7.16 and Tables 7.1-7.3.
A1, Policies S10-S12 and SA14; paragraphs 7.4.1-7.4.4.
Medway Council Matter 7, responses 7.12-7.14 and 7.18.8-7.18.10.
Email advice from the ELNA author recorded during preparation of Matter 7 regarding land/floorspace distinction and delivery uncertainty.

Explanation

13.197.2 The ELNA expressly advises against de-allocating established sites merely because the gross pipeline is large, noting that new land is not substitutable for built space, particularly premises at secondary rents. The Council's approach is therefore selective: it supports regeneration and alternative uses where justified, while retaining sufficient replacement and relocation capacity. This is especially relevant to Medway City Estate and the Frindsbury Peninsula, where managed release should not occur ahead of suitable alternative premises. The Plan also recognises that some permissions are longstanding, low intensity or specialist, so headline floorspace totals overstate readily deliverable general employment supply. This is consistent with Matter 7 responses 7.12–7.14 and 7.18.8–7.18.10, which distinguish gross land or floorspace capacity from premises that are suitable, available and affordable to existing occupiers. Release without regard to timing and market segment could remove lower-cost premises before replacement space is available, frustrate business relocation and undermine regeneration. A selective, criteria-led approach is therefore more justified than treating the headline supply figure as evidence that all underused land is surplus.

Conclusion

13.197.3 The selective approach to release is justified by B12 and Matter 7 responses 7.12–7.14 and 7.18.8–7.18.10. The proposed supporting-text clarification would improve effectiveness and transparency.

Proposed Main/Minor Modification

13.197.4 Minor Modification to supporting text: add a paragraph after the explanation of Policies S11-S12 stating:

> "*The gross pipeline of employment land and floorspace should not be treated as directly interchangeable with readily available premises. In considering redevelopment or release, regard will be had to the type, quality, location and timing of alternative provision; the needs of existing occupiers, including premises available at secondary rents; and any requirement for replacement or relocation floorspace to be available before an existing employment area is released*."

Reason for proposed Main/Minor Modification

13.197.5 This is a minor supporting-text clarification. It does not alter the policy strategy, but explains why the identified pipeline does not justify wholesale release and improves effectiveness in applying Policies S11, S12 and SA14.

13.198 What transport and infrastructure improvements are required to support the allocated employment sites set out within Policy SA14?

Council's response

13.198.1 The transport and infrastructure requirements vary according to the scale, location and proposed use of each allocation. They include improvements to strategic and local highway capacity and site access, public transport and active travel connections, utilities and power infrastructure, flood risk and drainage measures, and site-specific servicing. The principle and broad nature of these requirements are identified through the Infrastructure Delivery Plan (B2), Strategic Transport Assessment (B18.1) and site-specific evidence. Detailed mitigation, funding arrangements and delivery triggers will be established through masterplanning and the planning application process.

Evidence base

B2, Infrastructure Delivery Plan and Infrastructure Delivery Schedule.
B18.1, Strategic Transport Assessment.
B12, paragraphs 2.19-2.34, 4.17-4.22, 4.42 and 4.58.
A1, Policy SA14 and relevant site-specific policies.
Medway Council Matter 7, responses 7.4, 7.7 and 7.21.

Explanation

13.198.2 The evidence base identifies the broad infrastructure requirements associated with the principal employment locations. MedwayOne and Kingsnorth rely upon the Peninsula Way/A289/M2 corridor and will require development-specific access, highway capacity and sustainable transport measures. Innovation Park benefits from its relationship with the Rochester Airfield/Junction 3 M2 corridor, while the Cuxton allocations require appropriate connections to the Medway Valley transport network and Basin3 requires suitable access and servicing arrangements.

13.198.3 The Infrastructure Delivery Plan (B2) provides the overarching infrastructure framework, while the Strategic Transport Assessment (B18.1) assesses the transport implications of planned growth and the mitigation required to accommodate it. The Employment Land Needs Assessment (B12) additionally considers the accessibility and infrastructure characteristics of the principal employment locations. This is consistent with the approach already explained by the Council in Matter 7, particularly responses 7.4, 7.7 and 7.21, which confirm that infrastructure requirements have been considered alongside the employment strategy and that detailed provision will need to be coordinated with site delivery.

13.198.4 It is neither necessary nor proportionate for Policy SA14 to prescribe the detailed design or cost of every infrastructure intervention at allocation stage. Those matters will depend upon the scale, form and phasing of individual proposals. The important requirement for the Plan is to establish that the allocations are capable of being supported by the necessary infrastructure and to ensure that, where

infrastructure or mitigation is necessary to make development acceptable, it is secured and delivered at the appropriate stage. The evidence base provides that strategic framework, with detailed measures appropriately determined through masterplanning, transport assessment and the development management process.

Conclusion

13.198.5 The evidence identifies the strategic transport and infrastructure requirements necessary to support the employment allocations and demonstrates that these do not represent an overriding constraint to their delivery. Detailed requirements will necessarily depend upon the scale, form and phasing of individual proposals and are therefore appropriately determined through masterplanning and the development management process. A minor clarification to the supporting text would improve effectiveness by making clear that development should be coordinated with, and where necessary conditional upon, the timely delivery of the infrastructure and mitigation required to support the relevant development or phase.

Proposed Main/Minor Modification

13.198.6 Minor Modification to supporting text: add:

> "*Development proposals for the allocated employment sites should identify the transport and other infrastructure necessary to support the development or relevant phase, and demonstrate how any necessary infrastructure and mitigation will be secured and delivered at the appropriate stage*."

Reason for proposed Main/Minor Modification

13.198.7 The modification would improve the effectiveness and clarity of the Plan by explaining how the strategic infrastructure requirements identified in B2 and B18.1 should be translated into individual proposals. It does not introduce a new infrastructure requirement or alter the principle of any allocation but clarifies that necessary infrastructure and mitigation should be secured and delivered at the appropriate stage in the development or phasing of the site.

13.199 Are the sites accessible by sustainable modes of transport?

Council's response

13.199.1 Yes. The allocated sites are considered capable of being satisfactorily accessed by sustainable modes, although the existing level of accessibility and the improvements required vary between sites. Urban and regeneration sites generally benefit from stronger existing public transport, walking and cycling connections, while some strategic peninsula and more peripheral sites will require improvements to sustainable transport provision as development comes forward. These requirements have been considered through the Strategic Transport Assessment, Sustainability

Appraisal and infrastructure planning evidence and will be refined through site-specific transport assessment and travel planning.

Evidence base

B18.1, Strategic Transport Assessment.
B2, Infrastructure Delivery Plan.
A3.2-A3.3, Sustainability Appraisal site and policy assessments.
A1, transport policies and Policy SA14 site requirements.
Medway Council Matter 7, responses 7.4, 7.21 and the allocation schedule at 7.18.

Explanation

13.199.2 Accessibility has been considered as part of the assessment and selection of the employment sites, but the Plan does not assume that every allocation has the same existing level of sustainable transport provision. The appropriate level of accessibility depends on the location, scale and type of employment proposed and the measures capable of being delivered alongside development.

13.199.3 The Strategic Transport Assessment (B18.1) provides the strategic assessment of the transport implications of Local Plan growth, while the Sustainability Appraisal considers accessibility as part of the assessment of reasonable alternatives and selected sites. The Infrastructure Delivery Plan (B2) identifies the wider infrastructure required to support planned growth. This is consistent with the Council's response to Matter 7, particularly responses 7.4 and 7.21, which explain that infrastructure and transport requirements have been considered alongside the employment strategy and that site-specific measures will be developed as proposals are brought forward.

13.199.4 The allocations therefore do not rely solely on their existing accessibility. Where improvements to public transport, walking or cycling infrastructure are necessary to support development, these will need to be identified through proportionate transport assessment and secured through the development management process. This allows the detailed package of measures to respond to the scale, form, phasing and likely travel characteristics of the particular development, while ensuring that sustainable transport forms an integral part of site delivery.

Conclusion

13.199.5 The evidence demonstrates that the employment allocations are capable of being satisfactorily accessed by sustainable modes, although the extent of existing provision and the improvements required vary between sites. The Strategic Transport Assessment, Sustainability Appraisal and Infrastructure Delivery Plan provide the strategic basis for this conclusion, with necessary site-specific measures appropriately identified and secured as individual proposals come forward. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.200 Can utilities, digital infrastructure and servicing requirements be accommodated?

Council's response

13.200.1 Yes. The evidence indicates that the allocated sites are capable of being served by the necessary utilities, digital infrastructure and servicing. The precise capacity, connection and reinforcement requirements will depend on the scale and nature of individual proposals and will therefore need to be confirmed through the development management process and coordinated with development phasing, particularly for infrastructure-intensive uses.

Evidence base

B2, Infrastructure Delivery Plan.
B12, paragraphs 2.19-2.22, 2.32, 2.34, 4.17-4.22, 4.42 and 4.58.
A1, Policy SA14 and infrastructure policies.
Medway Council Matter 7, response 7.21.

Explanation

13.200.2 The Employment Land Needs Assessment (B12) identifies power supply, digital connectivity and servicing as relevant locational considerations for modern employment development. The Infrastructure Delivery Plan (B2) provides the wider infrastructure framework for planned growth. The evidence therefore demonstrates that utilities and servicing have been considered as part of the allocation strategy and does not identify an infrastructure constraint which prevents the employment sites from being developed in principle.

13.200.3 The detailed requirements will, however, depend upon the nature, scale and phasing of individual proposals. This is particularly relevant to power- or data-intensive development, where connection requirements and any necessary network reinforcement may differ materially from conventional employment uses. These matters are therefore appropriately confirmed with the relevant infrastructure providers as proposals come forward and coordinated with the phasing of development. This is consistent with the Council's approach in Medway Council Matter 7, response 7.21, which addresses the infrastructure requirements associated with the employment strategy.

Conclusion

13.200.4 The evidence demonstrates that utilities, digital infrastructure and servicing requirements can be accommodated and does not identify an overriding infrastructure constraint to delivery of the allocations. Detailed capacity, connection and reinforcement requirements are appropriately addressed through the development management process once the scale and operational requirements of individual proposals are known. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.201 What assessment has been undertaken of environmental constraints affecting the employment allocations in Policy SA14?

Council's response

13.201.1 Environmental constraints affecting the employment allocations were assessed through the Land Availability Assessment, Site Selection Topic Paper, Sustainability Appraisal and Habitats Regulations Assessment, supported by topic-specific evidence addressing flood risk, biodiversity, landscape, heritage, agricultural land and amenity. This evidence informed site selection, indicative development capacity and the identification of mitigation and further assessment required as individual proposals come forward.

Evidence base

B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.
A3.1–A3.3, Sustainability Appraisal.
A4.1–A4.3, Habitats Regulations Assessment.
B6.1–B6.5, Strategic Flood Risk Assessment evidence.
B7, Landscape Character Assessment.
B9, Medway Heritage Asset Review 2025.
Medway Council Matter 4, relevant responses concerning heritage.
Medway Council Matter 6, relevant responses concerning biodiversity, landscape and flood risk.
Medway Council Matter 7, responses 7.19–7.20.

Explanation

13.201.2 Environmental constraints were considered throughout the assessment and selection of the employment sites. The Land Availability Assessment (B1) assessed

the suitability of potential development sites and identified relevant physical, environmental and policy constraints. The Site Selection Topic Paper (B22.1) explains how this assessment, together with the wider evidence base, informed the selection of sites for allocation.

13.201.3 The Sustainability Appraisal (A3.1–A3.3) assessed the likely environmental, social and economic effects of the spatial strategy, reasonable alternatives and proposed allocations. The Sustainability Appraisal appendices include the site assessment methodology, pre- and post-mitigation assessments of reasonable alternative sites, the reasons for site selection and rejection and the assessment of proposed site allocations.

13.201.4 Potential effects on habitats sites were assessed through the Habitats Regulations Assessment (A4.1–A4.3). Flood risk was considered through the Strategic Flood Risk Assessment evidence (B6.1–B6.5), including subsequent updates to reflect updated flood modelling. Landscape and heritage considerations were informed by the Landscape Character Assessment (B7) and Medway Heritage Asset Review 2025 (B9), alongside the Sustainability Appraisal and site-selection evidence.

13.201.5 The Council has already addressed the adequacy of this environmental evidence through its earlier examination statements. In Medway Council Matter 6, the Council explained the strategic approach to biodiversity and nature recovery and addressed landscape and flood-risk matters. In Medway Council Matter 6, responses 7.19–7.20 explain the role of the Land Availability Assessment, Site Selection Topic Paper and Sustainability Appraisal in assessing potential employment sites and their constraints.

13.201.6 Taken together then, the evidence identifies the principal environmental constraints relevant to the employment allocations and informed the suitability of sites for allocation, their indicative capacity and the mitigation required. Detailed environmental assessment remains appropriate at planning application stage where the nature or significance of an effect depends upon the detailed scale, layout, design, operation or phasing of a proposal.

Conclusion

13.201.7 The employment allocations have been subject to a proportionate and integrated assessment of environmental constraints through the Land Availability Assessment, Site Selection Topic Paper, Sustainability Appraisal, Habitats Regulations Assessment and supporting flood-risk, landscape and heritage evidence. This evidence informed site selection, indicative development capacity and the mitigation and further assessment required as individual proposals come forward. The approach is consistent with the Council's evidence presented in Matters 4, 6 and 7. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.202 How have impacts on designated ecological sites, protected habitats and biodiversity been assessed?

Council's response

13.202.1 Potential effects on designated ecological sites, protected habitats and biodiversity have been assessed through the Habitats Regulations Assessment, Sustainability Appraisal, Land Availability Assessment and site-selection process. These assessments have informed the selection of sites, the identification of potential effects and the mitigation requirements incorporated within the Plan's biodiversity, green infrastructure and site-specific policy framework.

Evidence base

A4.1–A4.3, Habitats Regulations Assessment.
A3.1–A3.3, Sustainability Appraisal.
B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.
A1, Submission Medway Local Plan 2041, biodiversity, green infrastructure and site-allocation policies.
Medway Council Matter 6, relevant responses concerning biodiversity and habitats: 7.19–7.20.

Explanation

13.202.2 Potential effects on internationally designated habitats were assessed through the Habitats Regulations Assessment (A4.1–A4.3), which considered the effects of the Plan, including relevant effects in combination with other plans and projects, and the mitigation necessary to address identified effects. The HRA therefore provides the principal plan-level assessment of the implications of the Local Plan for habitats sites.

13.202.3 The Sustainability Appraisal (A3.1–A3.3) provides the wider assessment of biodiversity and ecological effects associated with the spatial strategy, reasonable alternatives and proposed allocations. This includes consideration of designated sites, habitats and biodiversity as part of the comparative assessment of potential development options. The Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1) complement this work by identifying environmental constraints relevant

to individual sites and incorporating those considerations into the assessment and selection of land for allocation.

13.202.4 The Council has also addressed biodiversity and nature recovery through its response to Matter 6, explaining the strategic policy framework for biodiversity enhancement, habitat recovery, ecological networks and green infrastructure. The employment allocations therefore sit within a wider policy framework requiring ecological considerations to be addressed as development comes forward.

13.202.5 The level of ecological information required at planning application stage will depend upon the characteristics of the site and the nature, scale and design of the development proposed. Where applicable, this will include up-to-date ecological evidence and the identification of necessary avoidance, mitigation and compensation measures, together with the statutory requirements for biodiversity net gain and any project-level habitats assessment required under the relevant legislation. This provides an appropriate relationship between the strategic assessment undertaken through plan preparation and the detailed assessment of effects once individual proposals are sufficiently defined..

Conclusion

13.202.6 The potential effects of the employment allocations on designated ecological sites, protected habitats and biodiversity have been assessed through the HRA, Sustainability Appraisal, Land Availability Assessment and site-selection process, supported by the Plan's wider biodiversity and green infrastructure policy framework. These assessments provide a proportionate plan-level basis for the allocations, with detailed ecological effects and mitigation appropriately addressed as individual proposals come forward. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.203 What mitigation measures are required and are they deliverable?

Council's response

13.203.1 The mitigation required will depend on the characteristics of each allocation and the scale and form of development proposed. Measures identified through the evidence base include transport and access improvements, flood-risk and drainage measures, protection and enhancement of habitats, landscape and green infrastructure measures, responses to heritage and amenity constraints, and controls relating to matters such as noise, air quality and construction or operational impacts.

The Plan provides the framework for these measures to be defined, secured and appropriately phased as individual proposals come forward.

Evidence base

A1, Policy SA14 and relevant development management policies.
B2, Infrastructure Delivery Plan and Infrastructure Delivery Schedule.
B18.1, Strategic Transport Assessment.
A3.1–A3.3, Sustainability Appraisal.
A4.1–A4.3, Habitats Regulations Assessment.
B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.
Medway Council Matter 6, relevant responses concerning biodiversity, landscape and flood risk.
Medway Council Matter 7, responses 7.7 and 7.21–7.23.

Explanation

13.203.2 The evidence base identifies the principal constraints affecting the employment allocations and the broad mitigation necessary to enable development to proceed. The Land Availability Assessment (B1), Site Selection Topic Paper (B22.1) and Sustainability Appraisal (A3.1–A3.3) identify site-specific environmental and infrastructure considerations and informed the selection of sites, their indicative capacity and the mitigation expected as development comes forward. The Habitats Regulations Assessment (A4.1–A4.3) separately considers effects on habitats sites and the mitigation required within the Plan's wider ecological framework.

13.203.3 Transport and infrastructure mitigation has been considered through the Infrastructure Delivery Plan (B2) and Strategic Transport Assessment (B18.1). These provide the strategic framework for the transport and infrastructure interventions associated with planned growth. This is consistent with the Council's response to Matter 7, particularly responses 7.7 and 7.21–7.23, which address the deliverability of employment sites, infrastructure provision and the need to monitor delivery over the Plan period. Medway Council Matter 6 also explains that the Infrastructure Delivery Plan identifies infrastructure interventions, including transport, utilities and green and blue infrastructure, together with indicative costs, phasing and priorities.

13.203.4 Environmental mitigation will be determined according to the constraints identified for the site and the characteristics of the proposal. This may include measures relating to flood risk and drainage, habitat protection and enhancement, landscape treatment, heritage assets and their settings, noise, air quality and amenity. The Council's Matter 6 evidence provides further consideration of biodiversity, landscape and flood-risk matters, complementing the site-specific assessment undertaken through the plan-making process.

13.203.5 The evidence base therefore establishes the principal matters requiring mitigation and provides the framework through which that mitigation can be delivered. The precise form, extent and timing of measures will appropriately be refined when the detailed scale, layout, design, operation and phasing of development are known. Necessary measures can then be secured through the relevant policy requirements and, as appropriate, planning conditions, planning obligations and phasing arrangements.

Conclusion

13.203.6 The evidence identifies the principal mitigation measures likely to be required to support the employment allocations and provides an appropriate framework for their delivery. The Plan, Infrastructure Delivery Plan, Strategic Transport Assessment, Sustainability Appraisal, HRA and site-selection evidence provide the basis for identifying and securing proportionate site-specific mitigation as proposals come forward. This is consistent with the delivery approach set out in Matter 7 responses 7.7 and 7.21–7.23. No evidence has been identified that necessary mitigation is incapable of delivery or represents an overriding constraint to the allocations. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.204 How have landscape, heritage and amenity impacts been addressed?

Council's response

13.204.1 Landscape, heritage and amenity considerations were addressed through the site assessment and selection process described in response to Question 13.201, supported by the Sustainability Appraisal (A3.1–A3.3), Medway Landscape Character Assessment 2024 (B7) and Medway Heritage Asset Review 2025 (B9). The identified constraints are addressed through Policy SA14 together with the Plan's landscape, heritage, design and amenity policies. Detailed effects will be also be assessed through the development management process where they depend upon the scale, layout, design or operation of individual proposals.

Evidence base

A3.1–A3.3, Sustainability Appraisal.
B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.

B7, Medway Landscape Character Assessment 2024.
B9, Medway Heritage Asset Review 2025.
A1, Policy SA14 and relevant landscape, heritage, design and amenity policies.
Medway Council Matter 4, responses 4.34–4.39.
Medway Council Matter 6, responses 6.7, 6.9 and 6.21–6.24.
Medway Council Matter 7, responses 7.19–7.20.

Explanation

13.204.2 As set out in response to Question 13.201, landscape, heritage and amenity constraints formed part of the assessment and selection of the employment allocations through the Land Availability Assessment (B1), Site Selection Topic Paper (B22.1) and Sustainability Appraisal (A3.1–A3.3). The approach to the identification and delivery of mitigation is addressed at Question 13.203.

13.204.3 Landscape matters have been considered in detail in the Council's response to Matter 6. Responses 6.21–6.24 explain the basis and operation of Policy S4, including the role of landscape character in maintaining settlement identity and separation and the evidence supporting the policy. In particular, response 6.24 confirms that Policy S4 is largely informed by the Medway Landscape Character Assessment 2024 (B7), which the Council considers to provide a robust and up-to-date landscape evidence base. Responses 6.7 and 6.9 additionally explain how landscape considerations sit within the wider natural environment policy framework and are applied proportionately having regard to the scale, nature, location and site-specific circumstances of development.

13.204.4 Heritage matters have similarly been considered in detail in Matter 4. Responses 4.34–4.39 address the evidence supporting Policy DM9 and the wider Plan. Response 4.34 identifies the Medway Heritage Asset Review (B9) and Heritage Audit as providing the strategic evidence and local context, while responses 4.35–4.36 address how the heritage evidence informed the Plan and how the significance and setting of heritage assets were considered in accommodating planned growth.

13.204.5 Amenity effects will depend upon the detailed relationship between development and neighbouring uses, including matters such as layout, building scale, lighting, noise, traffic, servicing and hours of operation. These matters are addressed through the relevant development management policies and, as explained at Questions 13.201 and 13.203, can be assessed and mitigated in detail once the form and operation of individual proposals are known.

Conclusion

13.204.6 Landscape, heritage and amenity considerations have been addressed through the assessment described at Questions 13.201 and 13.203 and through the Plan's wider development management framework. Matter 6 responses 6.21–6.24 demonstrate the evidential basis for the Plan's approach to landscape, while Matter 4

responses 4.34–4.39 address heritage evidence and the consideration of significance and setting. These provide a proportionate framework for addressing strategic and site-specific effects. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.205 In relation to the larger strategic employment allocations, what evidence demonstrates that they are capable of delivery within the Plan period?

Council's response

13.205.1 The larger strategic employment allocations are supported by evidence of site availability, planning status, market demand and infrastructure provision, together with evidence concerning their anticipated phasing and delivery. The allocations have differing delivery characteristics and timescales, but collectively provide a portfolio of strategic employment opportunities capable of contributing to employment provision over the Plan period.

Evidence base

B12, Employment Land Needs Assessment, paragraphs 4.19–4.22, 4.58 and 7.7–7.16; Tables 7.1–7.3.
B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.
B2, Infrastructure Delivery Plan.
B18.1, Strategic Transport Assessment.
A1, Policy SA14 and relevant site-specific supporting text.
Medway Council Matter 7, responses 7.7, 7.18 and 7.20–7.23.

Explanation

13.205.2 The deliverability of the strategic employment allocations has been considered through the employment, site-selection and infrastructure evidence. The Employment Land Needs Assessment (B12) assesses market demand, existing and committed supply and the role of the principal employment locations. The Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1) provide the evidence concerning availability, suitability and achievability, while the Infrastructure Delivery Plan (B2) and Strategic Transport Assessment (B18.1) consider the infrastructure and transport requirements associated with planned growth.

13.205.3 This evidence is addressed in further detail in the Council's Matter 7 statement. Response 7.7 considers the evidence demonstrating that the proposed employment sites and economic development opportunities are deliverable, including market demand, committed supply, planning status and infrastructure provision. Response 7.18 provides the more detailed consideration of the employment land portfolio, while responses 7.20–7.23 address availability, infrastructure, phasing and monitoring. Medway Council Matter 7 therefore provides the detailed evidence supporting the Council's position on delivery and should be read alongside the site-specific evidence for Policy SA14.

13.205.4 The strategic allocations perform different roles and are expected to come forward at different stages. This provides flexibility within the portfolio and reduces reliance on the delivery of a single site or development opportunity. Site-specific infrastructure requirements have also been considered through B2 and B18.1 and, as explained in response to Question 13.198, will be refined and coordinated with individual proposals and development phasing.

13.205.5 The Council will continue to monitor planning progress, employment completions and the delivery of the strategic sites over the Plan period. This enables changes in delivery rates or market circumstances to be identified and considered within the wider employment land strategy.

Conclusion

13.205.6 The evidence demonstrates that the larger strategic employment allocations are available and capable of contributing to employment provision during the Plan period, with their differing planning status, delivery trajectories and infrastructure requirements reflected in the overall employment land portfolio. B12, B1 and B22.1 provide the principal employment, availability and achievability evidence, while B2 and B18.1 address the infrastructure and transport framework. This is consistent with the more detailed consideration of deliverability in Matter 7, particularly responses 7.7, 7.18 and 7.20–7.23. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.206 Are there any significant ownership, infrastructure, access or viability constraints relating to employment allocations within Policy SA14?

Council's response

13.206.1 No significant ownership, infrastructure, access or viability constraint has been identified through the plan-making evidence that would prevent delivery of the employment allocations. Site-specific constraints have been identified and assessed through the Land Availability Assessment, site-selection, infrastructure, transport and viability evidence and will require appropriate mitigation and coordination as individual sites come forward.

Evidence base

B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.
B2, Infrastructure Delivery Plan.
B5, Viability Assessment.
B12, Employment Land Needs Assessment, Chapters 4 and 7.
A1, Policy SA14 and relevant site-specific supporting text.
Medway Council Matter 7, responses 7.7, 7.18 and 7.20–7.23.

Explanation

13.206.2 The Council has considered ownership and availability through the Land Availability Assessment (B1) and Site Selection Topic Paper (B22.1). B1 assesses availability and achievability and records that achievability involves consideration of planning status and the action required to overcome identified constraints. As explained in Matter 7 response 7.20, the Council has also considered landowner support and promoter involvement. That response identifies the SA14 allocations as available and developable and records that a number form part of established strategic projects or benefit from planning permissions and active promoter support.

13.206.2 Infrastructure and access have been considered through the Infrastructure Delivery Plan (B2) and the wider transport evidence. Matter 7 response 7.18 confirms that B2 was used to assess new employment allocations against infrastructure requirements and delivery considerations. The detailed position on the infrastructure, sustainable transport and utility requirements of the allocations is addressed at Questions 13.198–13.200 above and need not be repeated here.

13.206.3 Viability has been considered at plan level through the Viability Assessment (B5), alongside the market evidence in the Employment Land Needs Assessment (B12). B5 provides the plan-making viability evidence and establishes the reference point for any subsequent viability assessment justified by particular circumstances at application stage. B12 complements this through its assessment of market demand and the employment land portfolio. Matter 7 response 7.20 confirms that the Council's assessment of deliverability included market demand, informed by take-up, vacancies, occupier requirements, developer consultation and commercial market conditions.

13.206.4 The environmental and mitigation requirements affecting individual allocations are addressed at Questions 13.201–13.204 above. Collectively, this evidence identifies the constraints relevant to delivery and provides the framework through which necessary infrastructure and mitigation can be secured as proposals come forward. Matter 7 response 7.18 concludes that the combined employment, land availability, infrastructure, viability, sustainability and habitats evidence identifies a realistic land supply whose distribution reflects economic, infrastructure, environmental and sustainability considerations.

Conclusion

13.206.5 No significant ownership, infrastructure, access or viability constraint has been identified through the evidence that would prevent delivery of the Policy SA14 employment allocations. The relevant constraints have been considered through the land availability, site-selection, infrastructure, transport, market and viability evidence and can be addressed through site-specific mitigation, infrastructure provision, phasing and the development management process. This is consistent with Matter 7 responses 7.18 and 7.20 and with the more detailed responses to Questions 13.198–13.205 above. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.207 How will the delivery of strategic employment sites be monitored throughout the Plan period?

Council's response

13.207.1 Delivery of the strategic employment sites will be monitored through the Local Plan Monitoring Framework (A14) and the Council's Authority Monitoring Report process (A15.1–A15.2), supported by monitoring of planning applications and employment land delivery and the review of the Infrastructure Delivery Plan (B2). This will enable the Council to monitor employment development against the requirements and strategy of the Plan and identify material changes in delivery over the Plan period.

Evidence base

A14, Monitoring Framework, Economic Development indicators for Policies S10–S12.
A15.1–A15.2, Authority Monitoring Reports.
B2, Infrastructure Delivery Plan and Infrastructure Delivery Schedule.
B12, Employment Land Needs Assessment, Chapter 7.

Medway Council Matter 7, responses 7.9, 7.16 and 7.23.
Medway Council Matter 14, responses 14.1, 14.2 and 14.5.

Explanation

13.207.2 The Monitoring Framework (A14) provides specific indicators for economic development and employment land, including the amount and type of completed employment floorspace, gross and net floorspace gains and losses, annual completed employment space within defined employment areas and changes in total employment floorspace and site area. These indicators are linked to Policies S10–S12 and principally use the Council's monitoring of planning applications as their data source.

13.207.3 This approach is consistent with the Council's response to Matter 7. In particular, response 7.16 confirms that employment performance will be monitored through A14 and the annual Authority Monitoring Reports, supported by the Infrastructure Delivery Plan as a live document.

13.207.4 The operation of the monitoring arrangements is addressed more comprehensively in Matter 14. Response 14.1 explains the integrated relationship between A14, the annual AMR, the Infrastructure Delivery Plan and Infrastructure Delivery Schedule, development management monitoring and topic-specific arrangements, including the role of annual monitoring in identifying variance and informing management action. Response 14.2 explains how individual indicators are linked to Local Plan policies, targets where applicable and identified data sources, and specifically confirms that the employment strategy will be monitored through floorspace and land delivery. Response 14.5 explains the annual review process and identifies persistent failure of strategic allocations to progress, and employment land delivery materially departing from the strategy, as matters capable of prompting further consideration and, where justified, corrective action or Plan review.

13.207.5 The strategic employment allocations will therefore be monitored within an established Plan-wide framework which records employment delivery, relates it to the relevant policy requirements and provides a mechanism for responding where delivery materially departs from the Plan's assumptions.

Conclusion

13.207.6 The delivery of the strategic employment sites will be monitored through the established Local Plan monitoring framework. A14 provides specific economic-development indicators linked to Policies S10–S12, supported by the annual AMR process and infrastructure monitoring. Matter 14 responses 14.1, 14.2 and 14.5 explain in detail how this monitoring will operate, how employment delivery will be measured and how material under-performance will inform management action or review. No additional monitoring mechanism specific to Policy SA14 is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

13.208 Does Policy SA14 provide a sufficiently clear framework for determining planning applications?

Council's response

13.208.1 Yes. Policy SA14 identifies the allocated employment sites, the scale and nature of employment development anticipated and the principal site-specific requirements relevant to their development. It operates alongside the strategic employment policies and the Plan's thematic and development management policies, which provide the wider framework for assessing individual proposals.

Evidence base

A1, Policy SA14 and relevant site-specific supporting text.
A1, Policies S10–S12 and relevant thematic and development management policies.
B1, Land Availability Assessment.
B22.1, Site Selection Topic Paper.
Medway Council Matter 7, responses 7.18–7.23.

Explanation

13.208.2 Policy SA14 should be read as part of the Plan as a whole. It identifies the employment allocations and establishes the site-specific framework for their development, while Policies S10–S12 set the wider economic and employment land strategy and the Plan's transport, infrastructure, environmental, design and other development management policies provide the criteria applicable to individual proposals.

13.208.3 The justification for the allocations and their role within the employment land portfolio is addressed in Matter 7, particularly responses 7.18–7.23. The Council's Matter 7 response explains that Policy S12 is implemented through Policy SA14, which identifies specific employment allocations and their anticipated contribution to future employment growth. It also records that the employment allocations have been considered alongside infrastructure and delivery requirements through B2 and the wider evidence base.

13.208.4 The responses to Questions 13.188–13.207 provide the more detailed explanation of how Policy SA14 will operate in practice. In particular:

(a) Questions 13.198–13.200 address transport, infrastructure, sustainable accessibility, utilities and servicing;
(b) Questions 13.201–13.204 address environmental constraints, ecology, mitigation, landscape, heritage and amenity;
(c) Questions 13.205–13.206 address deliverability and site constraints; and
(d) Question 13.207 explains the monitoring arrangements. These matters are therefore addressed through the allocation policy in combination with the relevant Plan-wide policies and evidence rather than requiring their repetition within each individual allocation.

13.208.5 The policy consequently provides sufficient certainty as to the land allocated and its intended employment function, while allowing matters that depend upon the detailed scale, design, layout, access, servicing and operation of a particular proposal to be assessed through the development management process. This provides an appropriately proportionate framework for determining applications without unnecessarily duplicating the requirements of other policies within Policy SA14.

Conclusion

13.208.6 Policy SA14 provides a sufficiently clear framework for determining planning applications when read alongside Policies S10–S12 and the Plan's relevant thematic and development management policies. The evidence supporting the allocations, their infrastructure and environmental requirements, deliverability and monitoring arrangements is addressed in Matter 7 responses 7.18–7.23 and Questions 13.188–13.207 above. No modification is required.

Proposed Main/Minor Modification

N/A.

Reason for proposed Main/Minor Modification

N/A.

13.209 Is Policy SA14 justified, effective and consistent with national planning policy relating to economic growth and employment development?

Council's response

13.209.1 Yes. Policy SA14 is supported by proportionate evidence, provides a positive and flexible portfolio of employment sites capable of meeting identified quantitative and qualitative employment needs, and operates alongside the Plan's wider economic, infrastructure and development management policies. The approach is justified, effective and consistent with national policy supporting sustainable

economic growth and recognising the differing locational requirements of business sectors.

Evidence base

A1, Policies S10–S12 and SA14.
B12, Employment Land Needs Assessment.
B1, Land Availability Assessment.
B2, Infrastructure Delivery Plan.
B5, Viability Assessment.
B18.1, Strategic Transport Assessment.
B22.1, Site Selection Topic Paper.
A3.1–A3.3, Sustainability Appraisal.
A4.1–A4.3, Habitats Regulations Assessment.
A14, Monitoring Framework.
A15.1–A15.2, Authority Monitoring Reports.
Medway Council Matter 7, responses 7.1–7.23.
NPPF December 2024, paragraphs 20(a)–(b), 23 and 85–87.

Explanation

13.209.2 Policy SA14 gives spatial expression to the employment strategy established through Policies S10–S12. As addressed in Matter 7, the Employment Land Needs Assessment (B12) identifies Medway's employment needs and provides the market evidence underpinning the strategy, while the Plan provides a portfolio of existing, committed and allocated employment land capable of accommodating a range of business sectors and responding flexibly to changing market circumstances. Matter 7 also demonstrates how the employment strategy has been considered alongside infrastructure requirements, site availability, environmental constraints and deliverability.

13.209.3 The justification for the individual allocations and the operation of Policy SA14 are addressed in detail in the preceding responses to Matter 13. Questions 13.188–13.197 address the role, scale, distribution and justification of the employment allocations, including the consideration of reasonable alternatives and the relationship between identified need and the employment land portfolio. Questions 13.198–13.204 address transport, infrastructure, utilities, environmental constraints and mitigation. Questions 13.205–13.206 address deliverability and potential constraints, and establish that the strategic employment allocations are capable of contributing to employment provision during the Plan period and that no significant ownership, infrastructure, access or viability constraint has been identified that would prevent delivery.

13.209.4 The evidence supporting this approach is complementary. B12 establishes employment needs and the market context; B1 and B22.1 address site availability, suitability, achievability and selection; B2 and B18.1 address infrastructure

and transport requirements; B5 provides the plan-level viability evidence; and the Sustainability Appraisal and Habitats Regulations Assessment address the environmental effects of the strategy and allocations. As previously explained in Matter 7, this combined evidence demonstrates that the Plan has made appropriate provision for forecast employment needs and identified a realistic employment land supply reflecting economic, infrastructure, environmental and sustainability considerations.

13.209.5 Policy SA14 also operates within an established monitoring framework. As explained at Question 13.207 and in Matter 14 responses 14.1, 14.2 and 14.5, the Monitoring Framework (A14) identifies economic-development indicators linked to Policies S10–S12, including employment floorspace delivery and changes in employment land, supported by the Authority Monitoring Report process and infrastructure monitoring. This provides a mechanism for assessing delivery throughout the Plan period and identifying material departures from the employment strategy.

13.209.6 Collectively, Policy SA14 and the wider Plan provide a clear framework for accommodating employment growth, responding to the differing requirements of economic sectors, coordinating development with necessary infrastructure and addressing site-specific constraints as proposals come forward. As concluded at Question 13.208, Policy SA14 provides a sufficiently clear framework for determining planning applications when read alongside Policies S10–S12 and the Plan's relevant thematic and development management policies.

Conclusion

13.209.7 Policy SA14 is justified by the Employment Land Needs Assessment, land availability and site-selection evidence and the assessment of reasonable alternatives. It is effective because it identifies a varied portfolio of employment opportunities, operates alongside the Plan's infrastructure and development management policies, is supported by evidence of deliverability and forms part of the established monitoring framework. It is consistent with national planning policy in making provision for employment development and supporting a positive and flexible approach to sustainable economic growth.

13.209.8 Therefore, having regard to the evidence and the Council's responses to Matters 7, 13 and 14, Policy SA14 is justified, effective and consistent with national policy. No modification is required.

Proposed Main/Minor Modification

N/A

Reason for proposed Main/Minor Modification

N/A

Conclusion for SA14

Having regard to:

- the Submission Medway Local Plan 2041 (A1);
- the Employment Land Needs Assessment (B12);
- the Land Availability Assessment (B1);
- the Site Selection Topic Paper (B22.1);
- the Infrastructure Delivery Plan (B2);
- the Strategic Transport Assessment (B18.1);
- the Viability Assessment (B5);
- the Sustainability Appraisal (A3.1–A3.3);
- the Habitats Regulations Assessment (A4.1–A4.3);
- the Monitoring Framework (A14); and
- the Council's responses to Matter 7;
- national planning policy; and
- the responses above,

13.209.9 The Council considers that Policy SA14 is positively prepared, justified, effective and consistent with national policy.

13.209.10 Positively prepared: Policy SA14 gives spatial expression to the economic strategy in Policies S10–S12 and provides a varied portfolio of employment opportunities capable of responding to Medway's identified quantitative and qualitative employment needs. The portfolio provides flexibility across different locations, forms of employment development and delivery timescales.

13.209.11 Justified: The scale, distribution and selection of the allocations are supported by proportionate evidence. The evidence establishes employment needs and market conditions, assesses site suitability, availability and achievability, considers reasonable alternatives and addresses infrastructure, transport, viability and environmental considerations.

13.209.12 Effective: The evidence demonstrates that the allocations are capable of contributing to employment provision during the Plan period and that no significant ownership, infrastructure, access or viability constraint has been identified that would prevent their delivery. Policy SA14 operates alongside the Plan's strategic and development management policies, with delivery monitored through the established Local Plan monitoring framework.

13.209.13 Consistent with national policy: Policy SA14 supports sustainable economic growth and provides flexibility to meet the differing locational and operational requirements of economic sectors. It provides a clear framework for bringing forward employment development while coordinating delivery with necessary infrastructure, transport and environmental considerations.

References

Reference	Document Title
A1	Submission Medway Local Plan 2041
A2.1–A2.4	Submission Policies Maps
A3.1–A3.3	Sustainability Appraisal
A4.1–A4.3	Habitats Regulations Assessment
A14	Monitoring Framework
A15.1–A15.2	Authority Monitoring Reports
B1	Land Availability Assessment
B2	Infrastructure Delivery Plan and Infrastructure Delivery Schedule
B5	Viability Assessment
B7	Medway Landscape Character Assessment 2024
B9	Medway Heritage Asset Review 2025
B12	Employment Land Needs Assessment
B18.1	Strategic Transport Assessment
B22.1	Site Selection Topic Paper

General Questions for Policies SA13-SA14

13.210 Taken together, do Policies SA13 and SA14 provide a justified and effective means of achieving the Plan's spatial development strategy?

Council's response

13.210.1 Yes, the Council's responses above to Policies SA13 and SA14 confirm the justification for the Policies and how they represent an effectiveness means of achieving the Plan's spatial development strategy. Both policies are important in shaping the longer term vision over the Plan period, and provide for further engagement and responding to updated evidence in delivering sustainable development and strengthening Medway's economy.

13.211 Have the cumulative effects of these allocations on transport infrastructure, ecological interests, water resources, wastewater treatment capacity, healthcare provision, education facilities and other critical infrastructure been adequately assessed? If so, how has this been demonstrated?

Council's response

13.211.1 The Council's response to the questions above for Policies SA13 and SA14 outline the evidence used to assess the infrastructure impacts and requirements, including the assessments in the SA (A3.1-A3.3) and HRA (A4.1 -A4.3). However the Policies recognise that the Frindsbury Peninsula opportunity area will come forward

later in the plan period, and further evidence and masterplanning including infrastructure requirements will be prepared during the plan period.

13.212 Is there sufficient certainty that the infrastructure and necessary mitigation measures to support these allocations will be delivered in a timely manner?

Council's response

13.212.1 Yes, the Council in its responses in Matters 9 and 10 Hearing Statements and to the site allocation policies SA13-SA14 above in this Hearing Statement has provided reference to appropriate and proportionate evidence on infrastructure requirements and mitigations that has informed the site allocation policies. The Council has prepared the Infrastructure Delivery Plan (B2) in conjunction with service providers and has provided Statements of Common Ground in relation to infrastructure delivery. The Council will use the monitoring, governance and review mechanisms outlined in the detailed responses to questions on specific policies in this Matter Hearing Statement, and those prepared for wider Matters in the Examination.

13.213 Are any main modifications required to ensure that Policies SA13 and SA14 are effective, justified and consistent with national policy?

Council's response

13.213.1 Yes, some main modifications are proposed. Please refer to the individual policy responses for details and explanation.

13.213.2 The Council will update a schedule of proposed modifications for review during the Examination.

Air Quality Planning Guidance

Medway Council

March 2016
(Revised November 2021)

Medway Council
Serving You

Summary

This air quality planning guidance document for Medway Council has been prepared in conjunction with the Kent and Medway Air Quality Partnership has been developed in response to the changes in national planning policy, through the National Planning Policy Framework (NPPF). This document will be reviewed and updated in light of any specific future national and local policy changes.

The document is available to download from the Council's website. In addition a template document on which this document has been based is available on the Kent and Medway Air Quality Partnership website www.kentair.org.uk.

This document has been developed to improve air quality across Kent and Medway and encourage emissions reductions to improve the environment and health of the population. In addition it aims to provide consistency as far as is practicable across the Kent and Medway area in the approach to air quality in the planning regime. In producing this document the Council also aims to provide developers with clear information as to what it will require and consistency in how it will approach planning applications in terms of air quality, which should help to speed up the planning process.

The document deals primarily with the air quality impacts from traffic emissions, although the increasing use of biomass boilers is now becoming an important local planning issue. The assessment and control of dust impacts during demolition and construction is also considered, as dusts contribute to airborne particulate matter. Greenhouse gas emissions are not addressed explicitly, as they are covered by other initiatives, but synergies exist between measures to minimise climate change and local air quality impacts.

It is recognised that development will in the main inherently increase road transport emissions, both during the construction and operational phases. However, it is also recognised that sustainable development can be a positive force for change. The approach in this document seeks to minimise road transport emissions wherever practicable to sustainable levels, by securing reasonable emission mitigation while also seeking to counter the cumulative impacts arising from all developments.

A key theme of the NPPF is that developments should enable future occupiers to make green vehicle choices and it explicitly states that low emission vehicle infrastructure, including electric vehicle (EV) re-charging, should be provided. This document seeks to develop consistent EV re-charging standards for new developments across Kent.

The air quality assessment process follows a staged process:

1. Using the 'Screening checklist' to determine whether the proposal qualifies as a 'major development'

2. Determining whether the development requires an air quality assessment or emissions assessment using the 'Air Quality and emission mitigation assessment checklist';

3. Determining whether an air quality assessment is required to assess the impact on public health and/or the local environment as well as the significance of a development on local air quality;

4. Determining whether an application should be refused on air quality grounds or what mitigation measures are required to make the development acceptable on air quality grounds;

The assessment process is summarised in the flow chart on page 3.

Acknowledgements:

The Air Quality Planning Guidance has been developed by using guidance documents produced by the Forest of Dean District Council, Sussex Air Quality Partnership and West Yorkshire Low Emissions Strategy Group with their permission.

Contents

Quick Reference Guide: Air Quality Assessment Process 3

1. Introduction 4
1.1 National Planning Policy Framework 4
1.2 Local Air Quality Management 6

2. What information is required and why 7
2.1 Pre-application stage 7
2.2 Checklist 1: Screening checklist 7
2.3 Checklist 2: Air quality and emissions mitigation assessment checklist 7
2.4 Air Quality Assessment 8
2.5 Planning Requirements and Outcomes 8
2.6 Emissions Mitigation Assessment 8

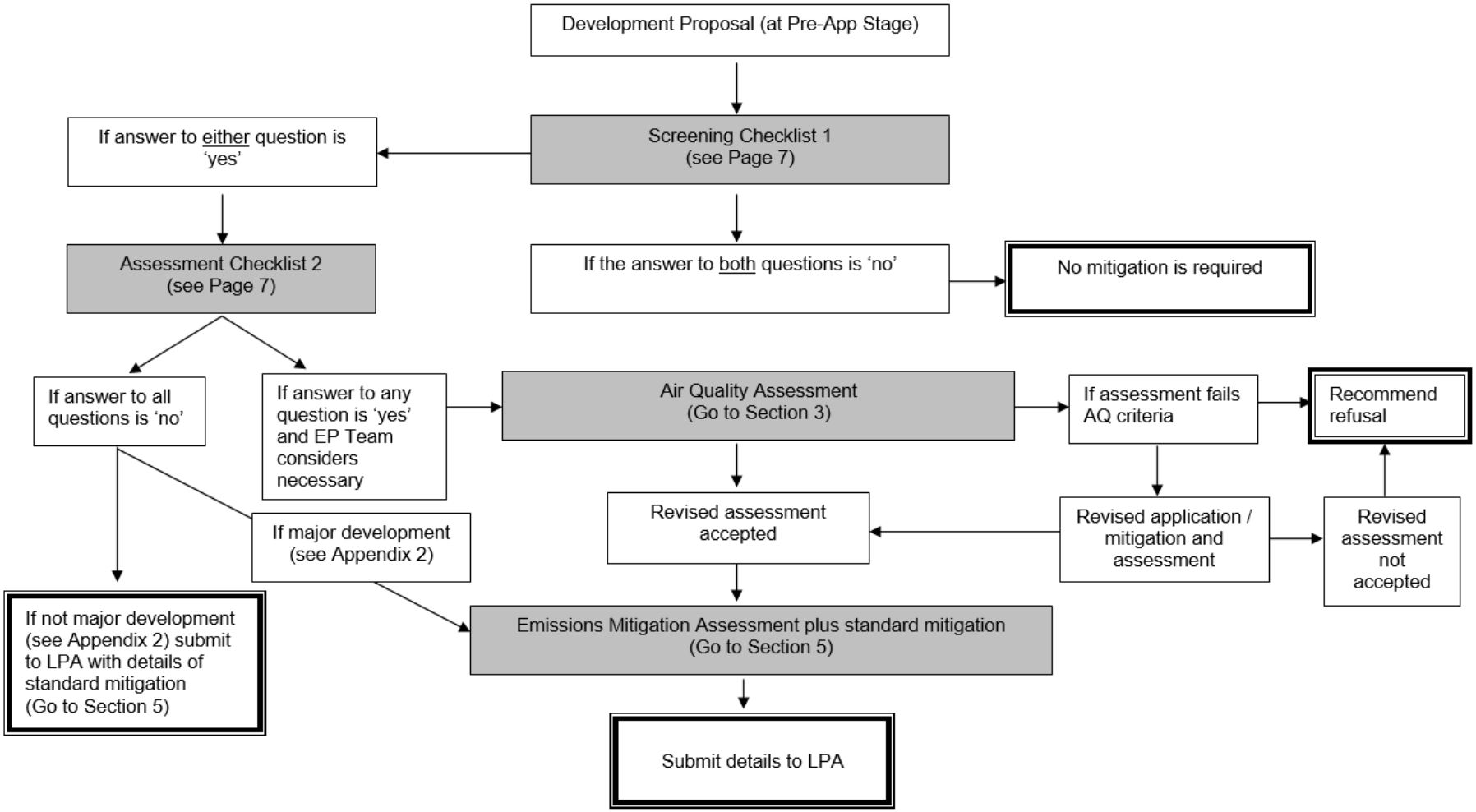
3. Air quality assessment 9
3.1 Air quality assessment process 9
3.2 Air quality assessment 9
3.3 Developments that require an Environmental Impact Assessment (EIA) 9
3.4 Determining the impact of a development on air quality 10
3.5 Areas where air quality is a concern 10
3.6 Assessment of the air quality impacts of a development. 11
3.7 Scaling of impacts on air quality from a development 11

4. Planning Requirements 12

5. Emissions mitigation assessment
5.1 Standard mitigation for all developments 13
5.2 Emissions mitigation assessment 13
5.3 Mitigation for minor developments 13
5.4 Mitigation for all other developments 14
5.5 Emissions mitigation calculator 14
5.6 Example emissions mitigation calculation 15
5.7 Requirements for mitigation measures 16

References 17
Appendices 18

Quick Reference Guide: Air Quality Assessment Process



1 Introduction

Clean air is essential for life. The quality of the air impacts on human health, the natural environment and can damage buildings and materials. The aim of this document is to provide advice for developers and their consultants on addressing local air quality when making a planning application in Medway.

Medway Council continues to review and assess the air quality across its area to identify if there are any exceedences of the National Objectives. To date this has resulted in the declaration of 4 Air Quality Management Areas (AQMAs) in Medway (Appendix 1). These have been declared based on high nitrogen dioxide (NO_2) levels.

Air quality is a material planning consideration when a development is considered. The Local Planning Authority (LPA) will require an air quality assessment where certain criteria are met.

This document has been developed to: -

- Introduce a method for assessing the air quality impacts of a development which includes the quantification of impacts, calculation of damage costs and the identification of mitigation measures to be implemented to negate the impact of development on air quality.
- Tackle cumulative impacts.
- Provide clarity and consistency of the process for developers, the local planning authority (LPA) and local communities.

1.1 National Planning Policy Framework

The NPPF 2019 sets out the overarching national policy objectives relating to air quality and development. Most notably, it emphasises that development should, wherever possible help to improve local environmental conditions such as air quality. The most relevant paragraphs in respect of air quality are set out below:

Para 170 Planning policies and decisions should contribute to and enhance the natural and local environment by:

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air quality;

Para 181 Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in AQMAs and Clean Air Zones is consistent with the local air quality action plan.

The following paragraph outlines the relationship between the planning process and the environmental permitting system:

Para 183 The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

The following paragraphs recognise the impact of traffic on air quality and health and the benefits of sustainable transport modes:

Para102 Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for mitigation and for net gains in environmental quality; -

Para103 The planning system should actively manage patterns of growth in support of these objectives significant development should be focused on locations which are or can be made Air Quality & Planning SPD September 2019 10 sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

Para105. If setting local parking standards for residential and non-residential development, policies should take into account:

a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels; and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

National Planning Practice Guidance (NPPG) provides advice to planning authorities on implementing the NPPF, including guidance on how air quality can be considered as part of the planning process, stating that, “Local Plans may need to consider:

- the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments;

- the impact of point sources of air pollution (pollution that originates from one place); and,

- ways in which new development would be appropriate in locations where air quality is or likely to be a concern and not give rise to unacceptable risks from pollution. This could be through, for example, identifying measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable.

When deciding whether air quality is relevant to a planning application, considerations may include whether the development would:

- Significantly affect traffic in the immediate vicinity of the proposed development site or further afield. This could be by generating or increasing traffic congestion; significantly changing traffic volumes, vehicle speed or both; or significantly altering the traffic composition on local roads. Other matters to consider include whether the proposal involves the development of a bus station, coach or lorry park; adds to turnover in a large car park; or result in construction sites that would generate large Heavy Goods Vehicle flows over a period of a year or more.

- Introduce new point sources of air pollution. This could include furnaces which require prior notification to local authorities; or extraction systems (including chimneys) which require approval under pollution control legislation or biomass boilers or biomass-fuelled Combined Heat and Power (CHP) plant; centralised boilers or CHP plant burning other fuels within or close to an air quality management area.

- Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality.

- Give rise to potentially unacceptable impact (such as dust) during construction for nearby sensitive locations.

- Affect biodiversity. In particular, is it likely to result in deposition or concentration of pollutants that significantly affect a European-designated wildlife site, and is not directly connected with or necessary to the management of the site, or does it otherwise affect biodiversity, particularly designated wildlife sites.

The NPPG states that where a planning proposal, including mitigation, prevents sustained compliance with EU Limit Values or National Objectives for air quality and cannot be made acceptable then refusal of planning permission should be considered.

1.2 Local Air Quality Management

The Environment Act 1995 established the Local Air Quality Management (LAQM) regime. LAQM requires Local Authorities to review and assess ambient air quality in their areas against health-based standards for a number of specific pollutants prescribed in the Air Quality Regulations 2000 and Air Quality (Amendment) Regulations 2002. If there is a risk that levels of air pollution in any part of the authority's area will be higher than the prescribed objectives, the authority is required to designate an AQMA. It is then required to produce an Air Quality Action Plan, which sets out the measures it intends to take in pursuit of the objectives.

It is not necessarily the case that a proposed development in an area of poor air quality will have a negative impact. However, it is important to recognise when such development might introduce additional people into an area of poor air quality.

The declaration of an AQMA does not mean that there will be no new development within that area. Rather, it means that greater weight must be given to the consideration of air quality impacts and their mitigation.

In addition, the boundary of an AQMA does not necessarily define the limit of the area of poor air quality. The only constraint on the boundary definition is that it should be at least as large as the area of exceedance, where there is relevant exposure.

The fact that a development is within or close to an AQMA does not mean that it is necessarily affecting an area of exceedance of an Objective, or that it is being affected by air pollution that exceeds the objective. On the other hand, a development could introduce new exposure into an area of poor air quality, which has not been identified and declared as an AQMA, as previously there was no relevant exposure. The presence or potential creation of an AQMA should therefore not prevent development but will mean that development which mitigates its affect on air quality will be expected.

2 What information is required and why

2.1 Pre-application stage

In order to avoid unnecessary delays in the planning process and ensure optimum scheme design and sustainability, it is vital for communication at an early stage. Pre-application discussions with the LPA should flag up if a development is planned in an AQMA or is a major development as stated in Checklist 1.

2.2 Checklist 1: Screening checklist

Screening checklist	Yes	No	Recommendations
Q1. Is the proposed development categorised as a major size development?*			**If Yes, go to Checklist 2** **If No, go to Q2.**
Q2. Is the proposed development within, or close to an Air Quality Management Area (AQMA)**			**If Yes, go to Checklist 2** **If No, no mitigation is required**

Note: * Major sized category defined by Department for Transport indicative thresholds for transport assessments (see Appendix 2)
** AQMA locations can be found in Appendix 1

The purpose of Checklist 1 is to screen out developments which are not likely to have a significant effect on local air quality and, therefore, do not require further assessments.

The assessment is quick, simple and can be carried out by a developer, their agent or the LPA. If you need any help in completing the checklists, then please contact the Environmental Protection Team on env.planning@medway.gov.uk.

2.3 Checklist 2: Air quality and emissions mitigation assessment checklist

Question (answer all questions)	Yes	No	Recommendations
Q3. Does the development require an Environmental Impact Assessment (EIA)?			**If any question is answered = YES, Go to Section 5 standard mitigation for all developments and contact the Environmental Protection Team to confirm whether an air quality (AQ) assessment and / or emission mitigation assessment is also required.** **OR** **If all questions are answered = NO, and the development is a major development then Go to Section 5 standard mitigation for all developments and undertake an emissions mitigation assessment.** **OR** **If all questions are answered = NO, and the development is not a major development OR the Environmental Protection Team determines there is no need for an AQ and/or emissions mitigation assessment = Go to Section 5 standard mitigation for all developments.**
Q4. Will development type likely become large scale major development*? (either on its' own or as part of several separate cumulative planned developments.)			
Q5. Is there vehicle parking in the development: >100 (outside AQMA) or >50 (within or adjacent to AQMA)?			
Q6. For existing roads with >10,000 Annual Average Daily Traffic (AADT) does the development: Introduce extra vehicle movements (>5%), is it likely to cause congestion or introduce > 15 extra heavy duty vehicle movements per day?			
Q7. Will the development introduce new sensitive receptors into an AQMA?			
Q8. Are there any other proposed developments in the vicinity of this development which could have a cumulative effect on air quality?			
Q9. Is the development introducing biomass energy/heating plant into an urban environment?			
Q10. Is the development likely to impact on sensitive environments (i.e. SSSI's, National Parks etc.)			

*Large scale major development is one where the number of residential units to be constructed is 200 or more or 1,000 square metres of industrial, commercial or retail floor space. Where the number of residential units or floor space to be constructed is not given in the application a site area of 4 hectares or more should be used as the definition.

The purpose of Checklist 2 is to determine whether a development requires an air quality assessment and/or an emissions mitigation assessment.

The checklist should be carried out in consultation with the Environmental Protection Team.

Whether or not an assessment is required all development within an AQMA must provide details of standard mitigation to be submitted.

2.4 Air Quality Assessment

The purpose of an air quality assessment is to determine whether the predicted impacts from a development on local air quality will impact on public health and/or the local environment. This section also assesses the significance of the impact of a development on local air quality.

The assessment should be carried out by a developer's air quality consultant.

Guidance on how to carry out an air quality assessment is given in Section 3, with supporting information provided in Appendix 3.

2.5 Planning Requirements and Outcomes

The planning requirements and outcomes section provides information on whether a development should be refused on air quality grounds or if granted planning permission, what measures are required from a developer to make the development acceptable on air quality grounds.

Planning requirements in relation to the effect of a development on air quality are provided in Section 4.

Note: this section does not set out the specific mitigation requirements; these are provided in Section 5: Emissions mitigation assessment.

2.6 Emissions Mitigation Assessment

All major developments, will require an emissions mitigation assessment. The purpose of an emissions mitigation assessment is to determine the appropriate level of mitigation required from a development, by assessing the emission from that development.

The assessment should be carried out by a developer's air quality consultant.

Guidance on how to carry out an emission mitigation assessment is given in Section 5, with supporting information provided in the Appendices.

3 Air quality assessment

Before proceeding with the assessment, please contact the Environmental Protection Team to confirm that an assessment is needed. After confirmation and completion of the assessment, proceed to section 5 to produce the emissions mitigation assessment.

The purpose of an air quality assessment is to determine whether the predicted impact of a development on local air quality would adversely affect public health and/or the local environment, both to help determine a planning application and to determine the appropriate level of mitigation from a development. The assessment should be carried out by a developer's air quality consultant.

Applicants should always seek the latest information available on local air quality from the Environmental Protection Team.

3.1 Air quality assessment process

This section provides the technical elements and methodology for undertaking air quality assessments for developments. This includes:

- Guidance on air quality assessments
- Significance criteria for determining a developments' impact on air quality
- Recommendations for planning decisions.

3.2 Air quality assessment

An air quality assessment should clearly establish the likely change in pollutant concentrations at relevant receptors resulting from the proposed development during both the construction and operational phases. It must take into account the cumulative air quality impacts of committed developments (i.e. those with planning permission). The Council has used similar assessment methods to fulfil the requirements of their detailed Review and Assessment that led to the AQMA designations. For consistency, air quality assessments for developments should, where possible, follow similar methodologies.

- The Council will work with developers by providing guidance on the suitability of such measures which should be incorporated at the early design stage of any proposal.
- Guidance on the methodologies to be used for air quality assessments is also available in the Department for Environment, Food and Rural Affairs (DEFRA) Technical Guidance LAQM TG(16).

Note: Further detail of the air quality assessment requirements can be found in Appendix 3.

3.3 Developments that require an Environmental Impact Assessment (EIA)

The EIA procedure ensures that the likely effects of a new development on the environment are fully understood. The EIA is likely to include a detailed study of the effects of any development upon local air quality as highlighted below.

- Developments that require an EIA include major developments which are of more than local importance; developments which are proposed for particularly environmentally sensitive or vulnerable locations and developments with unusually complex and potentially hazardous environmental effects.
- Most proposals for commercial or industrial installations that have the potential to emit pollution (e.g. Part A1, A2 and B installations) are likely to require an air quality assessment under the EIA regulations but more detailed "screening" may be required before this can be finally determined.

There are likely to be many other situations where developments that do not require a full EIA will nevertheless warrant an air quality assessment as part of the planning application.

- It is advised that developers, as good practice, should check with the LPA to determine whether an air quality assessment is required before submitting a planning application.

Key point:

Planning applications for major developments may require an EIA, which may need to include a more detailed assessment of the likely air quality effects. The Environmental Impact Assessment Directive provides the policy requirement for EIAs.

3.4 Determining the impact of a development on air quality

The key concern with regard to the air quality impacts of a development is the likely effect on human health. It is important that an air quality assessment evaluates modelled air quality in terms of changes in pollution concentrations where there is relevant public exposure.

- The Air Quality Regulations are concerned with areas that exceed air quality objectives and the revised Air Quality Strategy (2007) considers overall exposure reduction.
- This guidance considers that any development that leads to additional air pollution problems, even if it is outside an AQMA, could be significant.
- The local authority will have to make a balanced judgment on the likely impact of each development, based on the results of the air quality assessment and their professional experience. The local authority may also need to consider the impact of the development on air quality in neighbouring authorities.

3.5 Areas where air quality is a concern

There are key areas where the magnitude of change as well as the concentration of pollutants in air caused by proposed development is a concern.

In some cases, any additional contribution of emissions may worsen air quality and cause the creation of a new AQMA and, therefore, a small change in pollutant concentration can be as much a cause for concern as a large one. The areas of concern to consider are:

- AQMAs
- Areas near to or adjacent to AQMAs and candidate AQMAs
- Developments that require an EIA

The process for determining the impacts of a development on air quality is detailed below.

3.6 Assessment of the air quality impacts of a development

1. The air quality assessment provides modelled predicted concentrations for scenarios (for the year of application and an agreed year of opening): without development (baseline), with development, with development including mitigation measures.

2. A comparison of the scenarios will be presented in the report. Compare scenario "without development (baseline)" with scenario "with development including mitigation measures".

3. The difference in the compared scenarios is used to determine the classification of the change in air quality concentration.

4. The scale of air quality impact due to changes of concentration or if the additional concentration causes local exposure to approach or breach air quality objectives, determines the planning recommendations.

5. Planning recommendations are then provided.

3.7 Scaling of impacts on air quality from a development

An air quality assessment of a development should include modelling results as part of an air quality assessment for a proposal. These shall include modelled output scenarios "with" and "with-out" mitigation proposals as part of the application, to demonstrate predicted health exposure.

- Once the modelled outputs are agreed by the Environmental Protection Team, then the scale or "magnitude" of change in pollutant concentration can be used to determine the significance of the air quality impact from a development.

- The increase in pollutant concentration is compared to National Air Quality Objective (AQO) levels and pollutant increases are expressed as percentages according to Table 1.

- The level of the change or magnitude provides the scale for recommendations for a planning decision (see Table 2, below).

The following table sets the classification of impact to determine their significance.

Table 1 Classification of impacts due to changes in pollutant concentration.

Classification of impact	Concentration change due to development:	Or if development contribution causes:
Very High	Increase > 10%	Worsening of air quality within an existing AQMA Creation of a new AQMA Introduction of new receptors within an existing AQMA
High	Increase > 5 – 10%	Levels to be within 5% AQO
Medium	Increase >1 <5 %	Levels to be within 10% AQO
Low/Imperceptible	Increase < 1%	-

Note: Concentrations are relative to national air quality objective levels (AQO).

4 Planning requirements

If the air quality assessment determines specific changes in air quality due to a single development or from the cumulative effect of several developments; the following determinations will be made by the LPA (see Table 2).

- An overriding consideration will be to ensure that the air quality in existing AQMAs does not worsen by the introduction of a development and/or that there is no additional air pollution burden from a development(s) which could create new AQMAs.

- Each decision must be a balance of all material considerations depending upon the individual merits and circumstances. The weight to be given to the impact on air quality in the consideration of a planning application and the acceptability of proposed mitigation measures lies with the relevant local planning authority. Any agreed measures will be taken forward by condition where possible, or through the use of Section 106 agreements.

- Refusal of a planning application may still result if air quality impacts from a development remain, even after all reasonable means to mitigate the impacts on air quality have been exhausted.

Table 2 Planning requirements and outcomes.

Magnitude of change in air quality	Likely requirements	Likely outcomes
Very High	Require evidence to show that mitigation will cancel out air quality impacts. If impact of development on air quality still very high = strong presumption for recommendation for refusal on air quality grounds.	Recommend refusal
High	Seek mitigation to significantly reduce air quality impacts. Mitigation to include reducing exposure through various measures, emissions reduction technologies and/or development redesign.	Recommend refusal unless significant mitigation measures are implemented.
Medium	Seek mitigation to reduce air quality impacts. Mitigation to include reducing exposure through various measures, emissions reduction technologies and/or development redesign.	Ensure mitigation is implemented.
Low/Imperceptible	Recommend the minimum mitigation for development scheme type.	Ensure minimum mitigation is implemented.

5 Emissions mitigation assessment

5.1 Standard mitigation for all major developments and all developments within or close to an AQMA

Residential:
All gas-fired boilers to meet a minimum standard of <40mgNOx/kWh
1 Electric Vehicle charging point* per dwelling with dedicated parking or 1 charging point per 10 spaces (unallocated parking)

Commercial/Retail/Industrial:
10% of parking spaces to be provided with Electric Vehicle charge points* which may be phased with 5% initial provision and the remainder at an agreed trigger level

Demolition/Construction:
Mitigation in accordance with the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction

Note: * this shall be the best technology available at the time of planning approval

5.2 Emissions mitigation assessment

The purpose of an emissions mitigation assessment is to assess the local emissions from a development and to determine the appropriate level of mitigation required to help reduce the potential effect on health and/or the local environment. In addition, the developer will be required to minimise dust emissions during the construction phase in accordance with the IAQM Guidance on the Assessment of Dust from Demolition and Construction.

Where mitigation is not integrated into a scheme, the LPA will require this through a planning condition(s). If on-site mitigation is not possible then the LPA may seek contribution to wider air quality mitigation measures through a section 106 agreement.

Each emissions mitigation assessment should include a brief emissions mitigation statement.

Emissions mitigation statement

The statement must include:

- Development traffic input data for emissions mitigation calculation
- Emissions calculation and totals
- Mitigation proposed to be equivalent to the value of emissions calculation (appropriate to the type and size of development and local policy requirements)
- Statement of provision required to minimise dust emissions in accordance with the IAQM Guidance on the Assessment of Dust from Demolition and Construction.

5.3 Mitigation for minor developments

If the development is within or close to an AQMA and is considered minor development then it will be at the discretion of the Environmental Protection Team to suggest reasonable mitigation options for these types of development.

5.4 Mitigation for all other developments

The emissions mitigation calculator provides a formula to calculate the emissions resulting from a development and produces an exposure cost value to be spent on mitigation measures.

The assessment should be carried out by a developer's air quality consultant. Please contact the Environmental Protection Team for assistance.

5.5 Emissions mitigation calculation

An emissions mitigation calculation inputs the additional number of trips generated by the development into the latest DEFRA Emissions Factor Toolkit (EFT)[1] which calculates the amount of transport related pollutant emissions a development is likely to produce. If the proposal is to include alternative fuels or technology i.e. LPG, EV etc, then there are "advanced options" within the EFT to accommodate this. The output is given in kg of specified pollutant per year and requires converting to tonnes per year. The output is then multiplied by the most appropriate Interdepartmental Group on Costs and Benefits (IGCB) damage costs[2] for the key pollutants nitrogen oxides (NOx) and particulates (PM10). Finally, the emissions total is then multiplied by 5 to provide a 5 year exposure cost value which is the amount (value) of mitigation that is expected to be spent on measures to mitigate those impacts. This value is used for costing the required emissions mitigation for the development.

The source sector damage costs are updated periodically by Defra, therefore the latest costs should always be used. Due to the total size of the Medway population, the Road Transport Urban Big source sector costs should be used in the emissions mitigation calculation. This may be subject to change, therefore clarification should always be obtained from the Environmental Protection Team.

The emissions mitigation is summarised below: -

Emissions Mitigation Calculation

EFT output x Damage costs x 5 years = 5 year exposure cost value

[1] http://laqm.defra.gov.uk/review-and-assessment/tools/emissions.html
[2] http://www.gov.uk/guidance/air-quality-economic-analysis

5.6 Example emissions mitigation calculation

The following example demonstrates the calculation based on a development with 10 domestic properties within an AQMA using version 6.0.2 of the EFT.

EFT input factors:

10 Household (urban not London) (2015) (NOx and PM10)

27 (trip/traffic ratio for 10 houses)

cars only (0% HGV)

50 kph (average speed)

10km (NTS UK average.)

EFT output = 34.74 kg/annum (NOx) and 3.39 kg/annum (PM10)

= 0.03474 tonnes/annum (NOx) and 0.00339 tonnes/annum (PM10)

x Damage cost £21,044/tonne (NOx) and £58,125/tonne (PM10)

=£731.07 + £197.04

x 5 (years)

= £3655.34 +£985.21

Total = £4,640

Notes:
- Trip rates can be sourced from transport assessment or local authority/transport authority.
- Trip length uses the 2014 National Travel Survey (NTS)[3] UK average = 7.3miles/10km
- The IGCB damage costs used are the IGCB Air Quality Damage Costs per tonne, 2015 prices (Central estimate: NOx = £21,044/tonne and PM10 £58,125/tonne Transport Average).

[3] https://www.gov.uk/government/collections/national-travel-survey-statistics

5.7 Requirements for mitigation measures

The mitigation options selected for a development should be relevant and appropriate to:

- Any local policies including Air Quality Action Plans and Climate Change Action Plans, which may determine the mitigation priorities that the local authority may wish to be incorporated within a particular scheme.

- Any local air quality concerns; to assist in the mitigation of potential cumulative air pollution impacts of the development on the local community.

- The type, size and activity of the development.

Scheme mitigation should be provided within the design of the development where possible. Table 3 lists the mitigation measures to be considered.

Table 3 Mitigation measures

Standard mitigation plus: -

Residential
• Travel plan (where required) including mechanisms for discouraging high emission vehicle use and encouraging the uptake of low emission fuels and technologies
• A Welcome Pack available to all new residents online and as a booklet, containing information and incentives to encourage the use of sustainable transport modes from new occupiers
• Eco-driver training and provision of eco-driver aid to all residents
• EV recharging infrastructure within the development (wall mounted or free standing in-garage or off-street points)
• Car club provision within development or support given to local car club/eV car clubs
• Designation of parking spaces for low emission vehicles
• Improved cycle paths to link cycle network
• Adequate provision of secure cycle storage
• Using green infrastructure, in particular trees* to absorb dust and other pollutants

Commercial/Industrial
• As above plus: -
• Differential parking charges depending on vehicle emissions
• Public transport subsidy for employees
• All commercial vehicles should comply with either current or previous European Emission Standard
• Fleet operations should provide a strategy for considering reduced emissions, low emission fuels and technologies
• Use of ultra low emission service vehicles
• Support local walking and cycling initiatives
• On-street EV recharging
• Contributing funding to measures, including those identified in air quality action plans and low emission strategies, designed to offset the impact on air quality arising from new development

Additional mitigation
• Contribution to low emission vehicle refuelling infrastructure
• Low emission bus service provision or waste collection services
• Bike/e-bike hire schemes
• Contribution to renewable fuel and energy generation projects
• Incentives for the take-up of low emission technologies and fuels

*For guidance on selecting the best air quality species please refer to the Urban Air Quality 2012 Woodland Trust document

The above lists are not exhaustive and further options may be suggested where the Council feels it is appropriate, depending on the scale of development and air quality issues within an area. The developer may also suggest alternative mitigation options not listed above provided that they clearly show the air quality benefits.

References

The Air Quality Standards Regulations 2010
http://www.legislation.gov.uk/uksi/2010/1001/contents/made

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf

Guidance on the assessment of dust from demolition and construction – IAQM (2014)
http://www.iaqm.co.uk/text/guidance/construction-dust-2014.pdf

DEFRA Emissions Factor Toolkit
http://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html

DEFRA Impact pathway guidance for valuing changes in air quality (2013)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/197900/pb13913-impact-pathway-guidance.pdf

DEFRA Interdepartmental Group on Costs and Benefits
https://www.gov.uk/air-quality-economic-analysis

DEFRA Technical Guidance Note LAQM TG (16)
https://laqm.defra.gov.uk/technical-guidance/

Environmental Impact Assessment Directive
http://ec.europa.eu/environment/eia/eia-legalcontext.htm

European Union Limit Values
http://ec.europa.eu/environment/air/quality/standards.htm

Electric Vehicle (EV) Network
http://www.ev-network.org.uk/

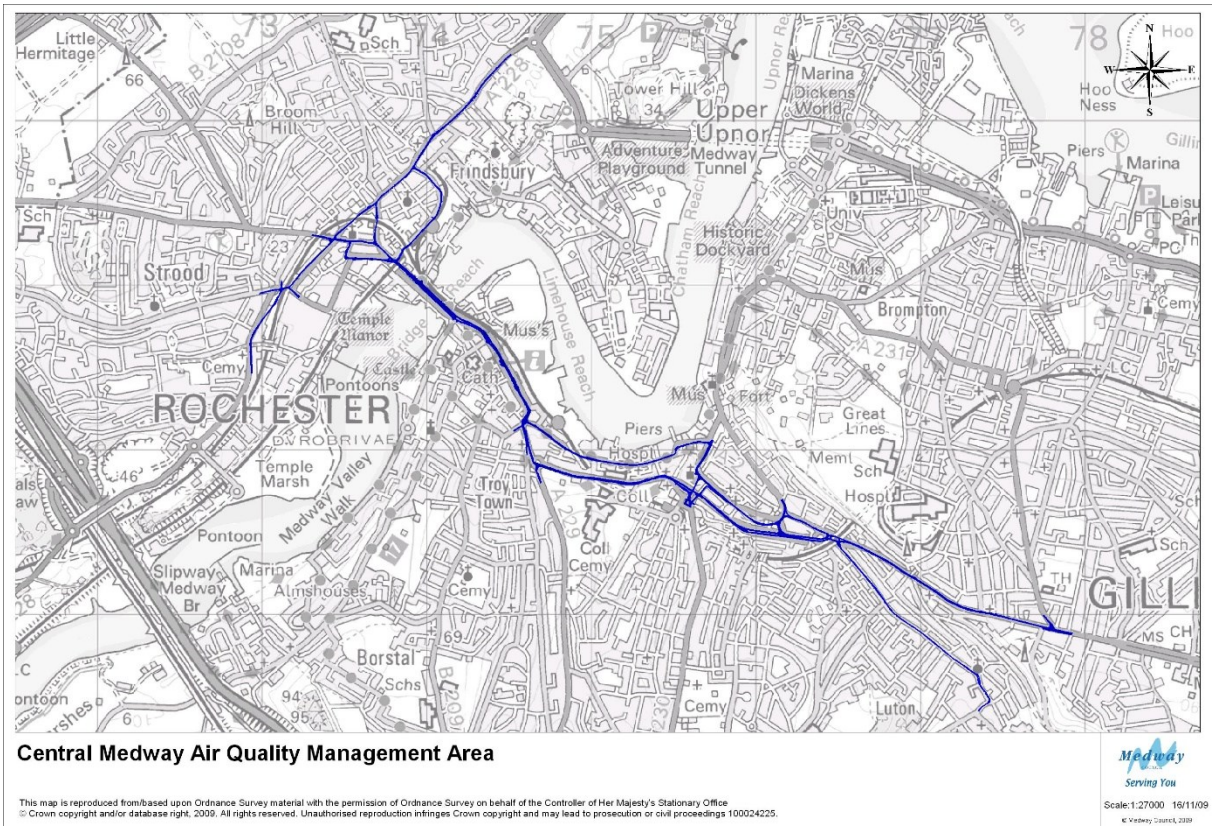
HM Treasury, Valuing impacts on air quality – Supplementary Green Book Guidance (2013)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/197893/pu1500-air-quality-greenbook-supp2013.pdf

National Planning Policy Framework (NPPF) February 2019
https://www.gov.uk/guidance/national-planning-policy-framework

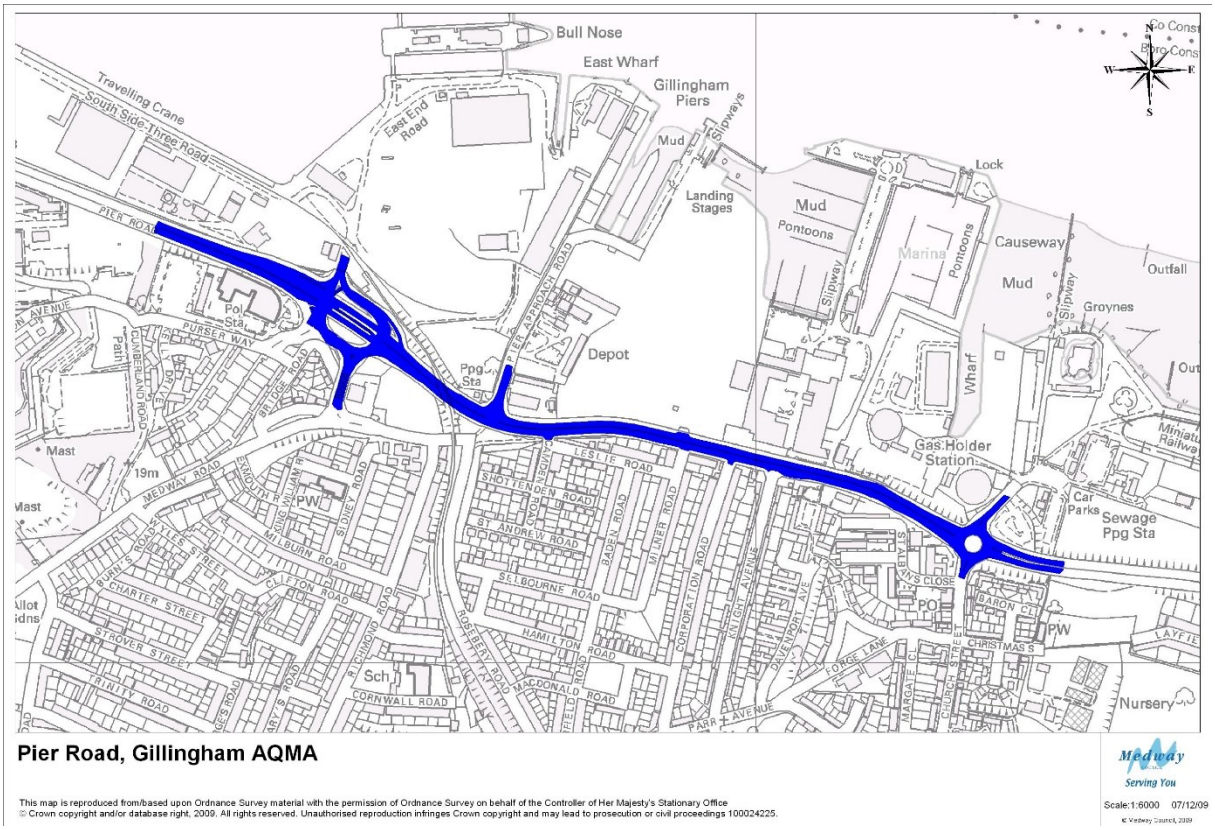
Town and Country Planning (Development Management Procedure) (England) Order 2010
http://www.legislation.gov.uk/uksi/2010/2184/pdfs/uksi_20102184_en.pdf

Appendix 1 – Maps of AQMAs

Central Medway AQMA

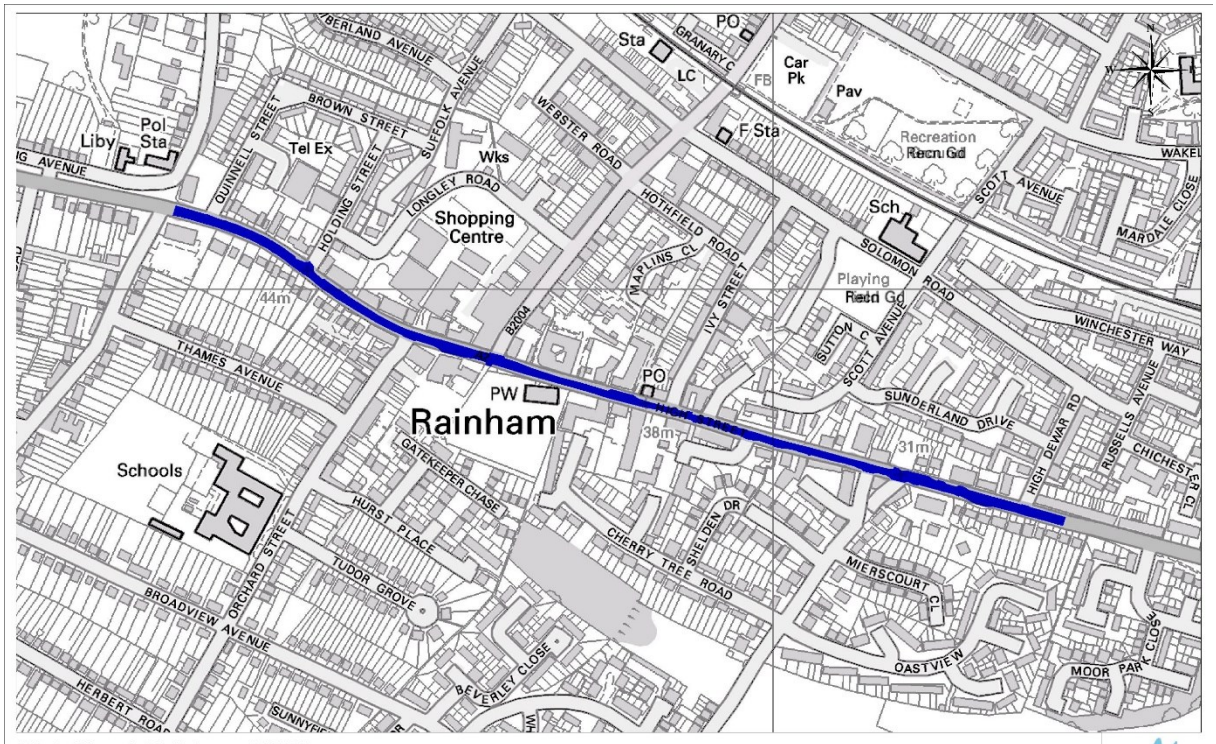


Pier Road, Gillingham AQMA



This map is reproduced from/based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office
© Crown copyright and/or database right, 2009. All rights reserved. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings 100024225.

High Street, Rainham AQMA



High Street, Rainham AQMA

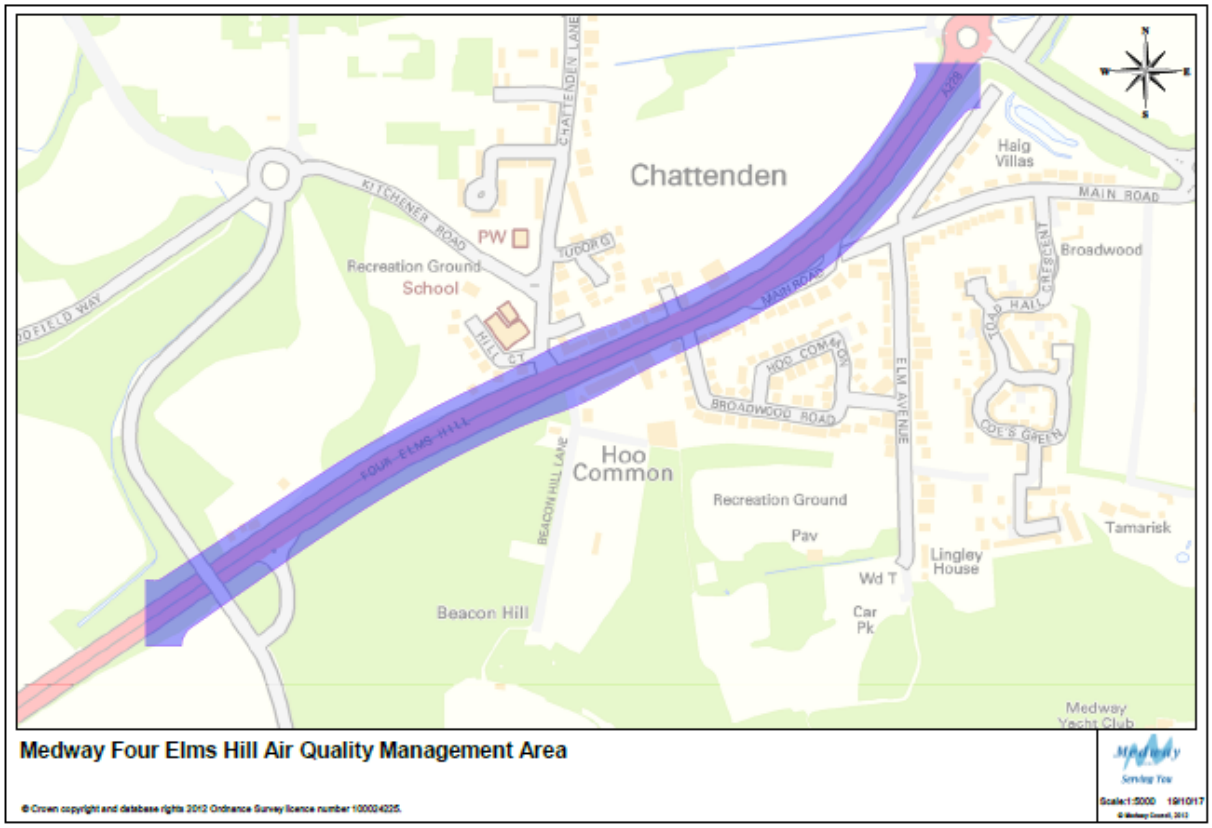
This map is reproduced from/based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office
© Crown copyright and/or database right, 2009. All rights reserved. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings 100024225.

Medway Serving You

Scale:1:5000 07/12/09

© Medway Council, 2009

Four Elms Hill, Chattenden AQMA



Appendix 2 - Criteria for Development Classification

The major sized category is determined using criteria from the Department for Transport indicative thresholds for transport assessments**.

Table 1: Criteria for Development Classification

Land Use	Description	Further Assessment Required
Food Retail (A1)	Retail sale of food goods to the public - supermarkets, superstore, convenience food store	>800m2
Non-Food Retail (A1)	Retail sale of non-food goods to the public; but includes sandwich bars or other cold food purchased and consumed off site	>1500m2
Financial and professional services (A2)	Banks, building societies and bureaux do change, professional services, estate agents, employment agencies, betting shops	>2500m2
Restaurants and Cafes (A3)	Use for the sale of food consumption on the premises	>2500m2
Drinking Establishments (A4)	Use as a public house, wine-bar for consumption on or off the premises	>600m2
Hot Food Takeaway (A5)	Use for the sale of hot food for consumption on or off the premises	>500m2
Business (B1)	(a) Offices other than in use within Class A2 (financial & professional) (b) Research & Development - laboratories, studios (c) Light industry	>2500m2
General Industrial (B2)	General industry (other than B1)	>4000m2
Storage and Distribution (B8)	Storage and distribution centres - wholesale warehouses, distribution centres and repositories	>5000m2
Hotels (C1)	Hotels, boarding houses and guest houses	>100 bedrooms
Residential Institutions (C2)	Hospitals, nursing homes used for residential accommodation and care	>50 beds
Residential Institutions (C2)	Boarding schools and training centres	>150 students
Residential Institutions (C2)	Institutional hostels, homeless centres	>400 residents
Dwelling houses (C3)	Dwellings for individuals, families or not more than six people in a single household	>50 units
Non-Residential Institutions (D1)	Medical & health services, museums, public libraries, art galleries, non-residential education, places of worship and church halls	>1000m2
Assembly and Leisure (D2)	Cinemas, dance and concert halls, sports halls, swimming, skating, gym, bingo, and other facilities not involving motorised vehicles or firearms.	>1500m2

**http://webarchive.nationalarchives.gov.uk/+/http:/www.dft.gov.uk/adobepdf/165237/202657/guidanceontaappendixb

Other
1. Any development generating 30 or more two-way vehicle movements in any hour
2. Any development generating 100 or more two-way vehicle movements per day
3. Any development proposing 100 or more parking spaces
4. Any relevant development proposed in a location where the local transport infrastructure is inadequate
5. Any relevant development proposed in a location adjacent to an Air Quality Management Area (AQMA)

Appendix 3 - Air Quality Assessment Protocol to Determine the Impact of Vehicle Emissions from Development Proposals

An air quality assessment should clearly establish the likely change in pollutant concentrations at relevant receptors resulting from the proposed development during both the construction and operational phases. It must take into account the cumulative air quality impacts of committed developments (i.e. those with planning permission).

Key Components of an Air Quality Assessment

The assessment will require dispersion modelling utilising agreed monitoring data, traffic data and meteorological data. The modelling should be undertaken using recognised, verified local scale models by technically competent personnel and in accordance with LAQM TG(16). The study will comprise of:

1. The assessment of the existing air quality in the study area for the baseline year with agreed receptor points and validation of any dispersion model;
2. The prediction of future air quality without the development in place (future baseline or do nothing);
3. The prediction of future road transport emissions and air quality with the development in place (with development or do-something).
4. The prediction of future road transport emissions and air quality with the development (with development or do-something) and with identified mitigation measures in place.

The assessment report should include the following details:

A. A detailed description of the proposed development, including:

- Identify any on-site sources of pollutants;
- Overview of the expected traffic changes;
- The sensitivity of the area in terms of objective concentrations;
- Local receptors likely to be exposed;
- Pollutants to be considered and those scoped out of the process.

B. The relevant planning and other policy context for the assessment.

C. Description of the relevant air quality standards and objectives.

D. The assessment method details including model, input data and assumptions:

For traffic assessment;

- Traffic data used for the assessment;
- Emission data source;
- Meteorological data source and representation of area;
- Baseline pollutant concentration including any monitoring undertaken;
- Background pollutant concentration;
- Choice of base year;
- Basis for NOx:NO_2 calculations;
- A modelling sensitivity test for future emissions with and without reductions;

For point source assessments:

- Type of plant;
- Source of emission data and emission assumptions;
- Stack parameters – height, diameter, emission velocity and exit temperature;
- Meteorological data source and representation of area;
- Baseline pollutant concentrations;

- Background pollutant concentrations;
- Choice of baseline year;
- Basis for deriving NO_2 from NOx.

E. Model verification for all traffic modelling following DEFRA guidance LAQM TG(16):

F. Identification of sensitive locations:

G. Description of baseline conditions:

H. Description of demolition/construction phase impacts:

I. Summary of the assessment results:

- Impacts during the demolition/construction phase;
- Impacts during the operation phase;
- The estimated emissions change of local air pollutants;
- Identified breach or worsening of exceedences of objectives (geographical extent)
- Whether Air Quality Action Plan is compromised;
- Apparent conflicts with planning policy and how they will be mitigated.

J. Mitigation measures.

Air Quality Monitoring
In some case it will be appropriate to carry out a short period of air quality monitoring as part of the assessment work. This will help where new exposure is proposed in a location with complex road layout and/or topography, which will be difficult to model or where no data is available to verify the model. Monitoring should be undertaken for a minimum of six months using agreed techniques and locations with any adjustments made following Defra Technical Guidance LAQM TG(16).

Assessing Demolition/Construction Impacts
The demolition and construction phases of development proposals can lead to both nuisance dust and elevated fine particulate (PM_{10} and $PM_{2.5}$) concentrations. Modelling is not appropriate for this type of assessment, as emission rates vary depending on a combination of the construction activity and meteorological conditions, which cannot be reliably predicted. The assessment should focus on the distance and duration over which there is a risk that impacts may occur. The Institute of Air Quality Management (IAQM)[5] has produced a number of definitive guidance documents to which this guidance refers. The document `Guidance on the Assessment of the Impacts of Construction on Air Quality and the Determination of their Significance' should be the reference for reporting the construction assessment.

Cumulative Impacts
The NPPF (paragraph 124) recognises that a number of individual development proposals within close proximity of each other require planning policies and decisions to consider the cumulative impact of them. Difficulties arise when developments are permitted sequentially, with each individually having only a relatively low polluting potential, but which cumulatively result in a significant worsening of air quality. This will occur where:

- A single large site is divided up into a series of units, such as an industrial estate or retails park;
- A major development is broken down into a series of smaller planning applications for administrative ease; and
- There are cumulative air quality impacts from a series of unrelated developments in the same area.

[5] IAQM www.iaqm.co.uk

In the first two cases, the cumulative impact will be addressed by the likelihood that a single developer will bring forward an outline application for the whole site which should include an air quality assessment as part of an Environmental Impact Assessment. For major developments that are broken down into a series of smaller planning applications, the use of a `Master or Parameter Plan' that includes an air quality assessment will address the cumulative impact.

Appendix 4 - Electric Vehicle Charging Point Specification:

This shall be the best technology available at the time of planning approval.

EV ready domestic installations

- Cable and circuitry ratings should be of adequate size to ensure a minimum continuous current demand for the vehicle of 16A and a maximum demand of 32A (which is recommended for Eco developments).
- A separate dedicated circuit protected by an RCBO should be provided from the main distribution board, to a suitably enclosed termination point within a garage, or an accessible enclosed termination point for future connection to an external charge point
- The electrical circuit shall comply with the Electrical requirements of BS7671: 2008 as well as conform to the IET code of practice on Electric Vehicle Charging Equipment installation 2012 ISBN 978-1-84919-515-7 (PDF)
- If installed in a garage all conductive surfaces should be protected by supplementary protective equipotential bonding. For vehicle connecting points installed such that the vehicle can only be charged within the building, e.g. in a garage with a (non-extended) tethered lead, the PME earth may be used. For external installations the risk assessment outlined in the IET code of practice must be adopted, and may require an additional earth stake or mat for the EV charging circuit. This should be installed as part of the EV ready installation to avoid significant on cost later.

EV ready commercial installations

Commercial and industrial installations may have private 11,000/400 V substations where a TN-S supply may be available, simplifying the vehicle charging installation design and risk analysis. It is, therefore, essential for developers to determine a building's earthing arrangements before installation. Commercial vehicles have a range of charge rates and it is appropriate to consider a 3-phase and neutral supply on a dedicated circuit emanating from a distribution board. More than one EV charging station can be derived from a source circuit, but each outlet should be rated for a continuous demand of 63Amps. No diversity should be applied throughout the EV circuitry. 3 phase RCBOs should be installed and the supply terminated in a switched lockable enclosure. If an external application (for example car park or goods yard) is selected, the supply should be terminated in a feeder pillar equipped with a multi-pole isolation switch, typically a 300mA RCD, a sub-distribution board (if more than one outlet is fed from the pillar). If an additional earthing solution is required, the earth stake can be terminated within this pillar. See IET guideline risk assessment[6].

[6] www.theiet.org/resources/standards/ev-charging-cop.cfm

Medway Council

Pier Road, Gillingham, High Street, Rainham, and Central Medway

Air Quality Action Plan 2024-2029

In fulfilment of Part IV of the Environment Act 1995

Local Air Quality Management

2024

Information	Medway Details
Local Authority Officer	Stuart Steed
Department	Environmental Protection
Address	Medway Council, Dock Road, Chatham, ME4 4TR
Telephone	01634 331105
E-mail	stuart.steed@medway.gov.uk
Report Reference Number	ED19190
Date	31 May 2024

Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality between 2024-2029 within the three Air Quality Management Areas (AQMAs) declared in 2010: Central Medway AQMA, Pier Road, Gillingham AQMA, and High Street, Rainham AQMA. Further details on the declared AQMAs are presented on Defra's UK AIR website[1].

This action plan replaces the previous action plan which ran from 2015-2020. Projects delivered through the past action plan include:

- Review Regional Freight Strategy: Medway Council worked with Kent County Council on a draft revised regional Freight Action Plan (including Medway). Consultation and adoption to be undertaken during 2017. Movement of freight also tackled locally through the Medway draft Network Management Plan for 2017-2020. The draft plan aims to tackle road congestion, and performance indicators, such as journey times, traffic data, cycle count data. Air quality monitoring data can be used as a means of measuring the plans impact against a baseline scenario.
- Development of an Air Quality Communication Strategy.
- Setting up of AQAP Steering Group and book 6-monthly meetings with stakeholders.
- Develop and continue walk or cycle to school scheme and events.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with

1 Medway AQMA information

equalities issues, because areas with poor air quality are also often the less affluent areas[2,3].

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion[4]. Medway Council is committed to reducing the exposure of people in Medway to poor air quality in order to improve health.

We have developed actions that can be considered under seven broad topics:

- Freight and delivery management
- Policy guidance and development control
- Promoting low emission transport
- Promoting travel alternatives
- Public information
- Transport planning and infrastructure
- Traffic management

Our first priority is to bring about compliance with the Air Quality Strategy objectives across Medway, focusing on NO_2 concentrations within the Central Medway, Gillingham, and Rainham AQMAs (as well as the Four Elms Hill AQMA, which is addressed in a separate AQAP). To achieve this, we have included measures in the AQAP which target the key sources of emissions in the borough: diesel and petrol cars, light and heavy goods vehicles, and buses. Medway is also committed to working towards reducing emissions and concentrations of $PM_{2.5}$ across the borough and has included measures to achieve this in the AQAP.

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed

2 Environmental equity, air quality, socioeconomic status and respiratory health, 2010

3 Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

4 Defra. Abatement cost guidance for valuing changes in air quality, May 2013

in Europe), but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond Medway Council's direct influence.

Responsibilities and Commitment

This AQAP was prepared by the Environmental Protection Team of Medway Council with the support and agreement of the following officers and departments:

- Environmental Protection
- Transport and Parking
- Public Health
- Sustainable Transport
- Regeneration
- Licensing
- Public Transport Planning
- Green Spaces and Rights of Way and Access
- Climate Response

Cabinet will be asked to approve adoption of this AQAP following Statutory Consultation and subsequent finalisation of the plan.

Progress each year will be reported in the Annual Status Reports (ASRs) produced by Medway Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP please send them to: env,planning@medway.gov.uk

Table of Contents

Executive Summary i

Responsibilities and Commitment iii

Introduction 1

Summary of Current Air Quality in Medway 2

1.1 Summary of Current Air Quality in the Pier Road, Gillingham AQMA 3

1.2 Summary of Current Air Quality in the High Street, Rainham AQMA 4

1.3 Summary of Current Air Quality in the Central Medway AQMA 6

Medway's Air Quality Priorities 8

1.4 Public Health Context 8

1.5 Planning and Policy Context 9

1.5.1 National policy 9

1.5.2 One Medway Council Plan 10

1.5.3 Local Plan 11

1.5.4 Air Quality Planning Guidance 11

1.5.5 Climate Change Action Plan 12

1.5.6 Bus Service Improvement Plan 12

1.5.7 Local Transport Plan 13

1.5.8 Air Quality Communication Strategy 13

1.5.9 Local Cycling and Walking Infrastructure Plan 13

1.6 Source Apportionment 14

1.7 Required Reduction in Emissions 19

1.7.1 NOx and NO_2 emissions reductions 19

1.7.2 Scenario Modelling 20

1.8 Key Priorities 21

Development and Implementation of Medway's AQAP 22

1.9 Consultation and Stakeholder Engagement 22

1.10 Steering Group 23

AQAP Measures 24

Appendix A: Response to Consultation 29

Appendix B: Reasons for Not Pursuing Action Plan Measures 30

Appendix C: 2022 Baseline Model, Source Apportionment and Scenario Modelling Study 37

Appendix D: Steering Group Workshop Meeting Minutes 89

Glossary of Terms 106

List of Tables

Table 1 – Annual Mean NO_2 Concentrations at point of declaration for AQMAs in Medway 2

Table 2 – Improvement in Annual Mean NO_2 Concentrations and road NOx Concentration Required to Meet the Objective.....19

Table 3 – Consultation Undertaken 22

Table 4 – Air Quality Action Plan Measures 25

Table A- 1 – Breakdown of modelled NOx emissions at diffusion tube locations within AQMAs (% of total modelled NOx emissions) by source 50

Table A- 2 – Breakdown of measured NO_2 concentrations (2022) at diffusion tube locations within AQMAs µg/m^3) by source 52

Table A- 3 – Breakdown of modelled PM_{10} emissions at diffusion tube locations within AQMAs (% of total modelled NOx emissions) by source 56

Table A- 4 – Breakdown of modelled $PM_{2.5}$ emissions at diffusion tube locations within AQMAs (% of total modelled NOx emissions) by source 60

Table A- 5 – Summary of AQAP measures modelled and associated modelling scenarios 64

Table A- 6 – Comparison of modelled total annual NOx, PM_{10}, $PM_{2.5}$ and CO_2 emissions from road transport (tonnes/yr), across Medway, for the Bus Modelling Scenario 70

Table A- 7 – Comparison of modelled total annual NOx, PM_{10}, $PM_{2.5}$ and CO_2 emissions from road transport (tonnes/yr), across Medway, for the EV Modelling Scenario 70

Table A- 8 – Comparison of modelled annual NOx, PM_{10}, $PM_{2.5}$ and CO_2 emissions from road transport (tonnes/yr), across Medway, for the Freight Modelling Scenario.....70

Table A- 9 – Comparison of modelled NO_2 concentrations across Medway for the Bus Modelling Scenario 73

Table A- 10 – Comparison of modelled NO_2 concentrations across Medway for the EV Modelling Scenario 74

Table A- 11 – Comparison of modelled NO_2 concentrations across Medway for the Freight Modelling Scenario 75

Table A- 12 – Comparison of modelled PM_{10} concentrations across Medway for the Bus Modelling Scenario 79

Table A- 13 – Comparison of modelled PM_{10} concentrations across Medway for the EV Modelling Scenario 80

Table A- 14 – Comparison of modelled PM_{10} concentrations across Medway for the Freight Modelling Scenario 81

Table A- 15 – Comparison of modelled $PM_{2.5}$ concentrations across Medway for the Bus Modelling Scenario 85

Table A- 16 – Comparison of modelled $PM_{2.5}$ concentrations across Medway for the EV Modelling Scenario 86

Table A- 17 – Comparison of modelled $PM_{2.5}$ concentrations across Medway for the Freight Modelling Scenario 87

List of Figures

Figure 1 – Summary of air quality monitoring (annual mean NO_2 concentrations) at diffusion tube locations within Pier Road, Gillingham AQMA over the last five years 4

Figure 2 – Summary of air quality monitoring (annual mean NO_2 concentrations) at diffusion tube locations within High Street, Rainham AQMA over the last five years 5

Figure 3 – Summary of air quality monitoring (annual mean NO_2 concentrations) at diffusion tube locations within Central Medway AQMA over the last five years.....7

Figure 4 – Stacked bar chart showing NOx source apportionment for road transport and background sources for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022 16

Figure 5 – Stacked bar chart showing $PM_{2.5}$ source apportionment for road transport and background sources for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022 17

Figure 6 – Stacked bar chart showing PM_{10} source apportionment for road transport and background sources for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022 18

Figure A- 1 – Model domain and monitoring locations used in the assessment 38

Figure A- 2 – Modelled NO_2 concentrations across Medway in 2022 43

Figure A- 3 Modelled NO_2 concentrations across Central Medway AQMA in 2022 ...44

Figure A- 4 – Modelled NO_2 concentrations across Pier Road, Gillingham AQMA in 2022.....45

Figure A- 5 – Modelled NO_2 concentrations across High Street, Rainham AQMA in 2022.....46

Figure A- 6 Workflow and data used to calculate source apportionment 48

Figure A- 7 – Stacked bar chart showing NOx source apportionment for all road transport and background for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022.....49

Figure A- 8 – Stacked bar chart showing PM_{10} source apportionment for all road transport and background for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022.....55

Figure A- 9 – Stacked bar chart showing $PM_{2.5}$ source apportionment for all road transport and background for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022.....59

Introduction

This report outlines the actions that Medway Council will deliver between 2024-2029 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the borough of Medway.

It has been developed in recognition of the legal requirement on the local authority to work towards the Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This plan will be reviewed every five years at the latest and progress on measures set out within this plan will be reported on annually within Medway's air quality ASR.

Summary of Current Air Quality in Medway

Air quality in Medway is reviewed annually as part of the LAQM review and assessment process. The 2023 ASR presents annual mean concentrations monitored in 2022[5].

Medway Council carries out LAQM reviewing and reporting duties in line with the requirements of the Environment Act 1995. All previous years' reports are available at KentAir.

Medway has declared four Air Quality Management Areas (AQMAs): Central Medway AQMA, High Street, Rainham AQMA, and Pier Road, Gillingham AQMA (declared in 2010), and Four Elms Hill AQMA (declared in 2017). All four AQMAs were declared for exceedances of the annual mean NO_2 air quality objective (AQO). The NO_2 concentrations at the point of declaration for the AQMA's is available in Table 1. Further details on the AQMAs are presented on Defra's UK AIR website[6].

Table 1 – Annual Mean NO_2 Concentrations at point of declaration for AQMAs in Medway

AQMA and year of declaration	NO_2 concentration at point of declaration (μgm^{-3})
Central Medway (2010)	58.4 [7]
High Street, Rainham (2010)	52.9 [7]
Pier Road, Gillingham (2010)	52.7 [7]

[5] Medway Council. 2023 Air Quality Annual Status Report, 2023. Medway Council 2023 Annual Status Report

[6] Medway AQMA information

[7] Value presented is the maximum concentration measured within the AQMA as presented in Medway Council's 'Further Assessment of Air Quality for Central, Rainham and Gillingham AQMAs, 2011' document (i.e. based on 2009 data). It should be noted that these values have not been distance corrected.

AQMA and year of declaration	NO_2 concentration at point of declaration (μgm^{-3})
Four Elms Hill (2017)	52.0 [8]

1.1 Summary of Current Air Quality in the Pier Road, Gillingham AQMA

Figure 1 provides a summary of the annual mean NO_2 concentrations reported at diffusion tube locations within the Gillingham AQMA for 2018 – 2022, and compares them to the annual mean AQO (40 $\mu g/m^3$). The three diffusion tubes located within the Gillingham AQMA have not been in exceedance of the annual mean for NO2 over the past five years; concentrations have decreased across all diffusion tubes since 2018 and remained relatively stable around or below 30 $\mu g/m^3$ from 2020 to 2022. The maximum concentration recorded over the period 2018 – 2022 was 37.9 $\mu g/m^3$ at DT25 in 2018, and in 2022, the maximum concentration reported in the AQMA was 29.7 $\mu g/m^3$ at the same diffusion tube – well below the AQO.

Using the most recent population data from the Office of National Statistics[9], for Lower Super Output Areas (LSOAs)[10] within the AQMA, the total population of the LSOAs that are intersected by the Pier Road, Gillingham AQMA for 2021 was 11,733. This is a slight increase from 11,696 persons as recorded in the 2011 Census.

As a result of the sustained improvements in air quality in Gillingham AQMA, and consistent annual mean NO_2 measurements below 90% of the AQO, Medway

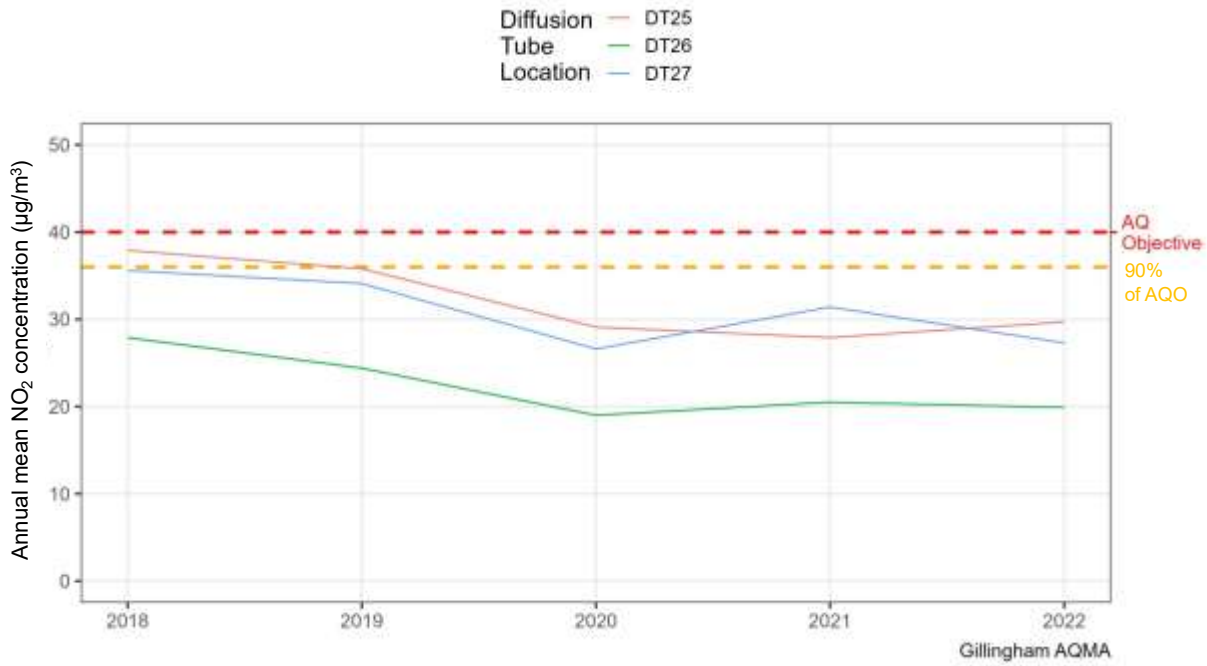
[8] Value presented is the maximum concentration measured within the AQMA as presented in Air Quality Consultants Ltd. 'Detailed Assessment of Air Quality at Four Elms Hill, Chattenden' for Medway Council (2016) (i.e. based on 2015 data). It should be noted that these values have not been distance corrected.

[9] 2011 and 2021 Census data: Lower layer Super Output Area population estimates (supporting information)

[10] LSOA boundaries: Lower layer super output areas December 2021 and 2011 Census Geography boundaries (Lower Layer Super Output Areas and Data Zones)

Council will continue to implement measures to improve air quality across the borough, and look to revoke the AQMA in the near future. Any updates will be provided in future ASRs.

Figure 1 – Summary of air quality monitoring (annual mean NO_2 concentrations) at diffusion tube locations within Pier Road, Gillingham AQMA over the last five years



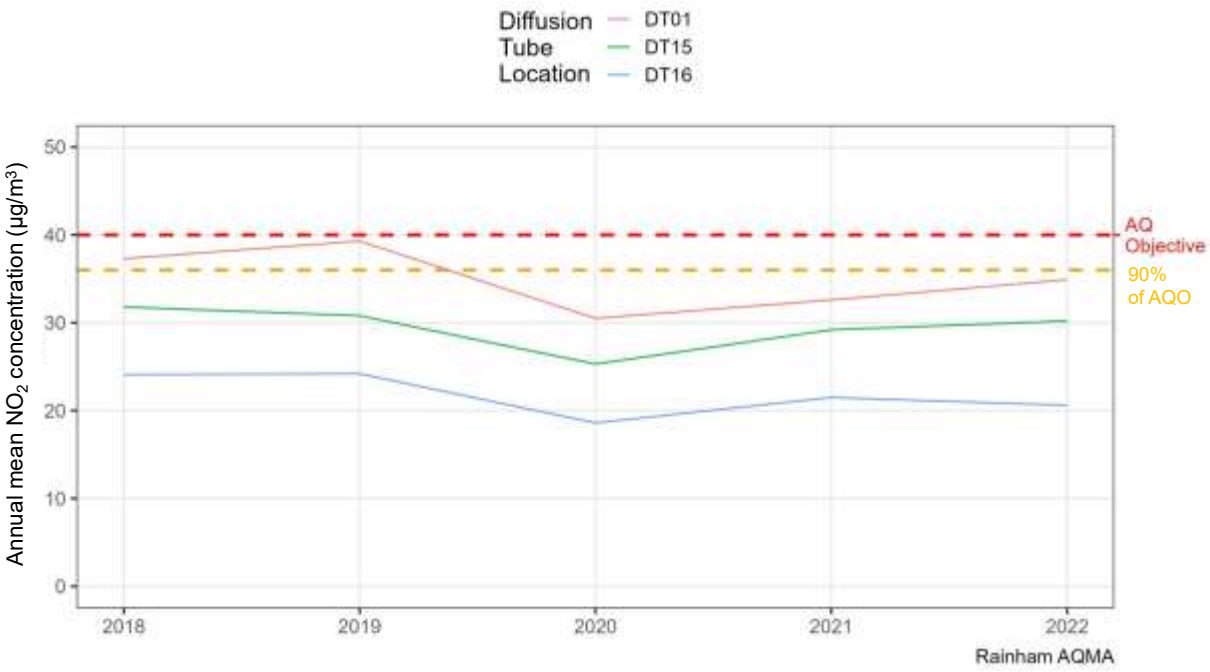
1.2 Summary of Current Air Quality in the High Street, Rainham AQMA

Figure 2 provides a summary of the annual mean NO_2 concentrations reported at diffusion tube locations within Rainham AQMA for 2018 – 2022. The three diffusion tubes located within the Rainham AQMA have not been in exceedance of the annual mean for NO_2 over the past five years, and have decreased slightly (though not linearly) from 2018 to present. DT15 and DT16 are well below the AQO in 2022, at approximately 30 µg/m^3 and 20 µg/m^3, respectively. The maximum concentration recorded over the period 2018 – 2022 was 39.3 µg/m^3 at DT01 in 2019 (within 10% of the AQO); in 2022, the maximum concentration reported in the AQMA was 34.9 µg/m^3 at the same diffusion tube.

Using the most recent population data from the Office of National Statistics[11], for Lower Super Output Areas (LSOAs)[12] within the AQMA, the total population of the LSOAs that are intersected by the High Street, Rainham AQMA for 2021 was 7,757. This is a slight increase from 7,527 persons as recorded in the 2011 Census.

There have been consistent annual mean NO_2 measurements below 90% of the AQO in Rainham AQMA, although concentrations have risen slightly from 2020 to 2022. As a result, Medway Council will continue to analyse the concentrations in Rainham AQMA and deliver actions to improve air quality, with the aim of revoking the AQMA in the future.

Figure 2 – Summary of air quality monitoring (annual mean NO_2 concentrations) at diffusion tube locations within High Street, Rainham AQMA over the last five years



[11] 2011 and 2021 Census data: Lower layer Super Output Area population estimates (supporting information)

[12] LSOA boundaries: Lower layer super output areas December 2021 and 2011 Census Geography boundaries (Lower Layer Super Output Areas and Data Zones)

1.3 Summary of Current Air Quality in the Central Medway AQMA

Figure 3 provides a summary of the annual mean NO_2 concentrations reported at the 21 diffusion tubes located within Central Medway AQMA, for 2018 – 2022. Concentrations have generally decreased slightly throughout the AQMA since 2018, although not linearly, and small increases in NO2 have been observed from 2020 to 2022 across most locations. As of 2022, there are only two locations, DT06 (Star Hill) and DT44 (High Street, Strood), exceeding the annual mean AQO for NO2 at 43.5 $\mu g/m^3$ and 42.2 $\mu g/m^3$, respectively. A further three locations (DT02 and DT03 on the High Street, Strood, and DT19 on London Road, Strood) were within 90% of the AQO in 2022 (measuring 38.6 $\mu g/m^3$, 38.8 $\mu g/m^3$, and 36.5 $\mu g/m^3$, respectively).

One of the two automatic monitoring sites in Medway (CHAT) is located in the Central Medway AQMA; the highest annual mean NO_2 recorded at this site over the last five years was 25.4 $\mu g/m^3$ (in 2018), which is well below the annual mean AQO for NO_2.

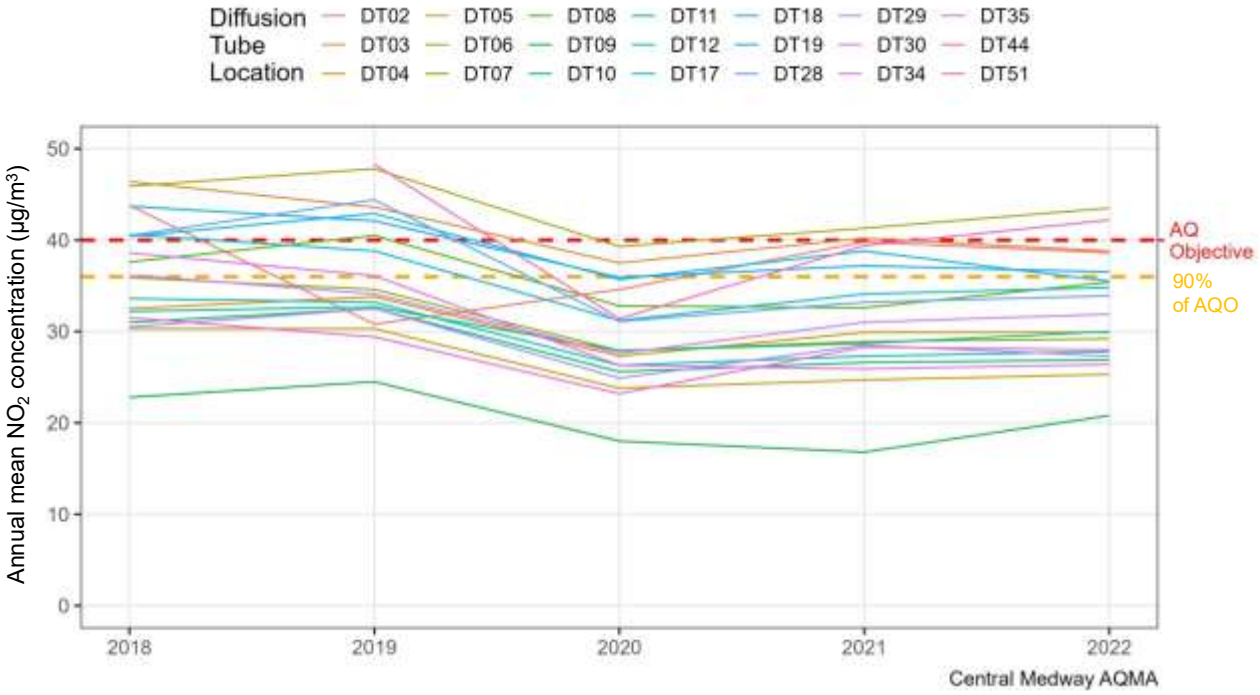
Using the most recent population data from the Office of National Statistics[13], for Lower Super Output Areas (LSOAs)[14] within the AQMA, the total population of the LSOAs that are intersected by the Central Medway AQMA for 2021 was 46,220. This is an increase from 42,097 persons as recorded in the 2011 Census.

While the majority of the monitoring locations in the AQMA have consistently reported annual mean NO_2 measurements below the AQO, at least two locations are still in exceedance, and others are within 90% of the AQO as of 2022. Going forward, Medway Council will continue to monitor air quality in Central Medway AQMA and deliver actions to improve air quality, with the aim of reducing emissions and concentrations and achieving the AQO throughout the borough.

[13] 2011 and 2021 Census data: Lower layer Super Output Area population estimates (supporting information)

[14] LSOA boundaries: Lower layer super output areas December 2021 and 2011 Census Geography boundaries (Lower Layer Super Output Areas and Data Zones)

Figure 3 – Summary of air quality monitoring (annual mean NO_2 concentrations) at diffusion tube locations within Central Medway AQMA over the last five years



Medway's Air Quality Priorities

1.4 Public Health Context

The impact of air quality upon health is unquestionable and has been a major driver in national and international attempts to reduce levels of air pollution. Pollutants such as NO_2, ozone, benzene, sulphur dioxide (SO_2) alongside PM_{10} and $PM_{2.5}$ and other chemicals or compounds by both chronic and acute exposure are linked to increased mortality and morbidity, through their association with the development of cardiovascular disease[15], lung cancer[16], aggravation of asthma and other allergic illnesses[17], reduced quality of life[18] and contribution to low birthweight[19].

In Medway, air quality is generally good and in compliance with the legal concentration levels set by the UK Government. However, there are still potential improvements to be made in light of the air quality targets for 2040 established under the Environment Act 2021[20] and to lower concentrations closer to the World Health Organisation's (WHO) Global Air Quality Guidelines[21].

The primary pollutant of concern in Medway is NO_2, which is primarily caused by traffic congestion and is concentrated along roadsides. Another pollutant of concern in Medway is fine particulate matter ($PM_{2.5}$), which is largely attributed to background

[15] Shah et al. Global association of air pollution and heart failure: a systematic review and meta-analysis The Lancet 2013; 382 (9897): 1039 - 1048.

[16] Raaschou-Nielsen et al. Air pollution and lung cancer incidence in 17 European cohorts: prospective analyses from the European Study of Cohorts for Air Pollution Effects (ESCAPE) Lancet Oncology 2013; 14(9): 813-822.

[17] Krzyzanowski K.-D. (2005). Health effects of transport-related air pollution. World Health Organization.

[18] Department for Environment, Food and Agricultural Affairs. (2010). Air Pollution: Action in a Changing Climate. Department for Environment, Food and Agricultural Affairs.

[19] Pedersen et al. Ambient air pollution and low birthweight: a European cohort study (ESCAPE) Lancet Respiratory Medicine 2013; 1(9): 695-704.

[20] Air Quality Targets in the Environment Act, Defra, Environment Act air quality targets

[21] World Health Organisation, WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide, 2021. WHO global air quality guidelines

concentrations, as well as local emissions from domestic and commercial combustion.

Medway Council takes action to protect its residents' health from potential harm emanating from low air quality in a variety of ways. This includes partnership work with colleagues in planning, to mitigate potential for air quality-related harm arising from developments, as well as proactively through communication initiatives identified in the Medway Air Quality Communications Strategy. Such initiatives have included undertaking targeted information campaigns to increase community awareness of means by which individuals can reduce their exposure and contributions to poor air quality or manage their long-term health conditions which may otherwise leave greater susceptibility to harm from low air quality.

1.5 Planning and Policy Context

1.5.1 National policy

The National Planning Policy Framework (NPPF)[22] provides guidance as to how planning can take account of the impact of new development on air quality. Paragraph 181 of the NPPF states that "*Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of AQMA and Clean Air Zones, and the cumulative impacts from individual sites in local areas*" and "*Planning decisions should ensure that any new development in AQMA and Clean Air Zones is consistent with the local air quality action plan"*.

To support the delivery of the NPPF, Defra has produced National Planning Policy Guidance (NPPG), including one specifically referring to air quality[23]. The NPPG states in Paragraph 005 (Reference ID: 32-005-20191101) "*Whether air quality is relevant to a planning decision will depend on the Proposed Development and its location. Concerns could arise if the development is likely to have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could*

[22] Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework
[23] Ministry of Housing, Communities and Local Government (2019) National Planning Practice Guidance – Air quality

affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species). Air quality may also be a material consideration if the Proposed Development would be particularly sensitive to poor air quality in its vicinity."

The Government's Clean Air Strategy[24] published in 2019 sets out the comprehensive actions required across all parts of government and society to improve air quality. The strategy explains that, under the current framework, local authorities must produce an AQAP when local air quality monitoring has identified concentration exceedances against maximum limits. Compliance with maximum limits, however, does not incentivise prevention. New legislation therefore will seek to shift this focus towards prevention. This will enable early action to be taken by local authorities to avoid exceedances against future targets set by national government. This new approach will be instrumental for the government to achieve its objective of improving public health and the environment.

1.5.2 One Medway Council Plan

Medway has recently published its One Medway Council Plan[25], which sets out the Council's vision, ambitions, and priorities for the period 2024-2028. The Plan outlines the challenges Medway is currently facing, as well as the values and behaviours that will shape the solutions to these challenges.

There are good synergies between this AQAP and the five priorities in the One Medway Council Plan. Of particular relevance is Priority 3: Enjoying clean, green, safe and connected communities, which includes a focus on providing a well-connected and sustainable travel system across Medway. To achieve this, the Council will increase walking and cycling networks, provide opportunities to use electric vehicles, and work with partners to ensure an integrated, accessible, safe

[24] Defra. Clean Air Strategy, 2019. Available online at: DEFRA Clean Air Strategy 2019

[25] One Medway Council Plan, Medway Council, 2024, available online at: One Medway Council Plan

and sustainable public transport system – facilitated by the actions presented in this AQAP.

1.5.3 Local Plan

Medway Council actively manages the effects of new developments on air quality within its area through the Medway Local Plan (2003)[26] Policy BNE24 'Air Quality', to ensure that new developments do not exacerbate existing air quality issues.

Medway Council is currently preparing its emerging Local Plan 2041[27]. The Council will be publishing its next stage of consultation in June 2024. This will include details of potential development sites and policies to manage Medway's sustainable growth. The refresh to the vision and strategic objectives strengthens the plan's role in helping to deliver better outcomes for the environment and health. New policies will build on the existing air quality policy and seek better integration of key objectives across the plan.

The Council has not yet published details of preferred development locations. However, given the scale of growth required over the plan period and the spread of land being assessed for potential development allocations in Medway, it is anticipated that there will be additional traffic on Four Elms Hill from development over the plan period. In considering potential development allocations on the Hoo Peninsula, the Council recognises the importance of effectively mitigating the impacts on transport networks and the environment. Mitigation measures would be required as part of development allocation policies.

1.5.4 Air Quality Planning Guidance

In conjunction with the Kent and Medway Air Quality Partnership, Medway produced its Air Quality Planning Guidance[28] in 2016 to deal with planning applications that could impact air quality. The guidance was prepared in response to changes in

[26] Medway. Medway Local Plan, 2003. Available online at: Medway Local Plan 2003

[27] Medway. Medway Local Plan 2041. Available online at Medway Local Plan 2041

[28] Medway. Air Quality Planning Guidance, 2016. Available online at: Medway Air Quality Planning Guidance

national planning policy, through the NPPF, and was revised in 2021. The guidance uses a method for assessing the air quality impacts of a development which includes the quantification of impacts, calculation of damage costs, and the identification of mitigation measures to be implemented to negate the impact of development on air quality. The guidance provides clarity and consistency of approach for developers, the local planning authority, and local communities.

1.5.5 Climate Change Action Plan

After declaring a climate emergency in 2019, Medway published its Climate Change Action Plan in 2021[29]. The action plan makes clear a link between reduction in carbon emissions and improvements in air quality. Measure 6 of the climate change action plan aims to reduce emissions from road transport by promoting and facilitating uptake of electric and ultra-low emissions vehicles, encouraging modal shift through enhanced sustainable infrastructure, and tackling congestion hotspots. Progress to this measure will significantly improve air quality as well as reduce carbon emissions.

1.5.6 Bus Service Improvement Plan

Medway recently published a draft Bus Service Improvement Plan (BSIP) 2021-2026[30]. In order to improve air quality, the plan commits to continue to seek additional funding from government and other available sources to improve fleet standards, whether that be retrofitting to Euro VI, or contributions towards the costs of new low or zero-emission vehicles thus allowing timely improvements to Medway AQMAs.

[29] Medway. Climate Change Action Plan, 2021. Available online at: Medway Climate Change Action Plan

[30] Medway. Summary: draft bus service improvement plan (BSIP) for Medway 2021 to 2026, 2021. Available online at: Medway Dract Bus Service Improvement Plan

1.5.7 Local Transport Plan

Medway adopted its Local Transport Plan in 2011, which will run until 2026[31]. The Plan sets a strategy to deliver transport interventions that contribute to improving air quality. Key interventions focus on more efficient management of the highway network and car parks, together with highway improvements that focus on congestion and air quality hotspots, thereby improving the reliability and environmental impact of the transport network.

1.5.8 Air Quality Communication Strategy

Medway published its Air Quality Communication Strategy[32] in 2017. The strategy details a series of recommended communications activities to increase the awareness of the health impacts of air pollution amongst key stakeholders and specific local groups affected by air pollution. It also aims to stimulate changes in the way in people and organisations view air pollution and empower them to take action to address this complex challenge.

1.5.9 Local Cycling and Walking Infrastructure Plan

Medway's Local Cycling and Walking Infrastructure Plan (LCWIP) sets out a plan for delivering local walking and cycling networks, so that active travel is the preferred choice when travelling in Medway. An increase in walking and cycling journeys will help to reduce travel congestion which has clear benefits for air pollution in Medway. The LCWIP is currently under consultation which runs from Monday 22 January 2024 until Sunday 3 March 2024[33].

[31] Medway. Local Transport Plan 2011-2026, 2011. Available online at: Medwtay Local Transport Plan 2011-2026

[32] The National Social Marketing Centre and Medway. Air Quality Communication Strategy, 2017. Available online at: Medway Air Quality Communication Strategy 2017

[33] Medway Local Cycling and Walking Infrastructure Plan (LCWIP) consultation, available online at: Medway Local Cycling and Walking Infrastructure Plan (LCWIP) consultation

1.6 Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of NOx emissions within the Central Medway, Rainham, and Gillingham AQMAs. By using a combination of local modelling inputs and Defra background concentration maps, a dispersion modelling study and source apportionment exercise was carried out by Ricardo on behalf of Medway Council for 2022 to better understand the pollution scene in Medway. The full technical baseline modelling report can be found in Appendix C: 2022 Baseline Model, Source Apportionment and Scenario Modelling Study.

The source apportionment exercise identified that, within the AQMAs, emissions from road transport contribute significantly to total emissions of the pollutants of concern (NOx, PM_{10} and $PM_{2.5}$). Considering the contribution from different vehicle types, diesel cars are responsible for most of the emissions from road transport; buses, and freight vehicles including light goods vehicles (LGVs) and rigid and artic heavy goods vehicles (HGVs) also contribute relatively large proportions of total pollutant emissions.

Figure 4 presents the source apportionment of NOx emissions at monitoring sites within the AQMAs in Medway. Whilst there are variations between receptor sites, the majority have a significant NOx contribution from diesel cars, as well as LGVs. For NOx, road transport generally contributes the majority of emissions at around 60-70%, whereas background NOx only contributes 30-40% of total emissions.

Figure 5 presents the source apportionment of $PM_{2.5}$ emissions at the same monitoring sites. Again, although there are variations between receptor sites, diesel and petrol cars contribute the most to road transport emissions. Buses, LGVs and HGVs are all contributors, but to a lesser extent. For $PM_{2.5}$, in contrast to NOx, road transport is responsible for a smaller proportion of total emissions at around 15-25%.

Background $PM_{2.5}$ is the more significant proportion of total emissions, around 75-85%, and is mainly made up of residual[34] and secondary PM.

Finally,

[34] As per the Defra Background Maps User Guide, residual particulate matter is "*Sea salt, calcium and iron rich dusts and regional primary PM and residual non-characterised sources (residual is 1.0 µg m^{-3})*"

Figure 6 presents the source apportionment of PM_{10} emissions at the monitoring sites. The situation is largely the same as for PM2.5, with diesel and petrol cars contributing the greatest proportions of road transport emissions. Again, buses, LGVs and HGVs all contribute, to a lesser extent. For PM_{10}, as with $PM_{2.5}$, road transport is responsible for a smaller proportion of total emissions and background PM_{10} is the more significant proportion of total emissions, mainly consisting of residual and secondary PM.

Figure 4 – Stacked bar chart showing NOx source apportionment for road transport and background sources for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022

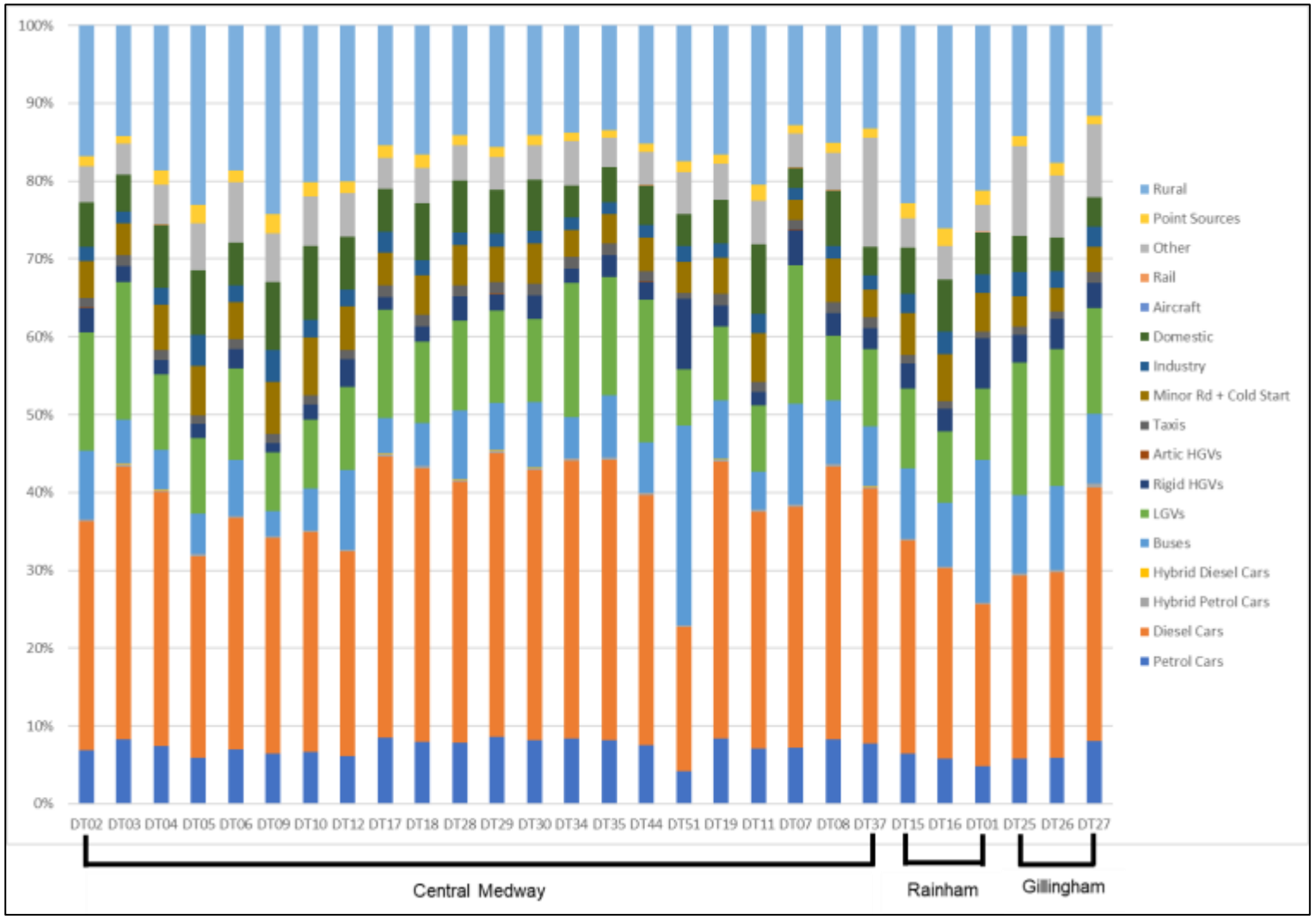


Figure 5 – Stacked bar chart showing $PM_{2.5}$ source apportionment for road transport and background sources for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022

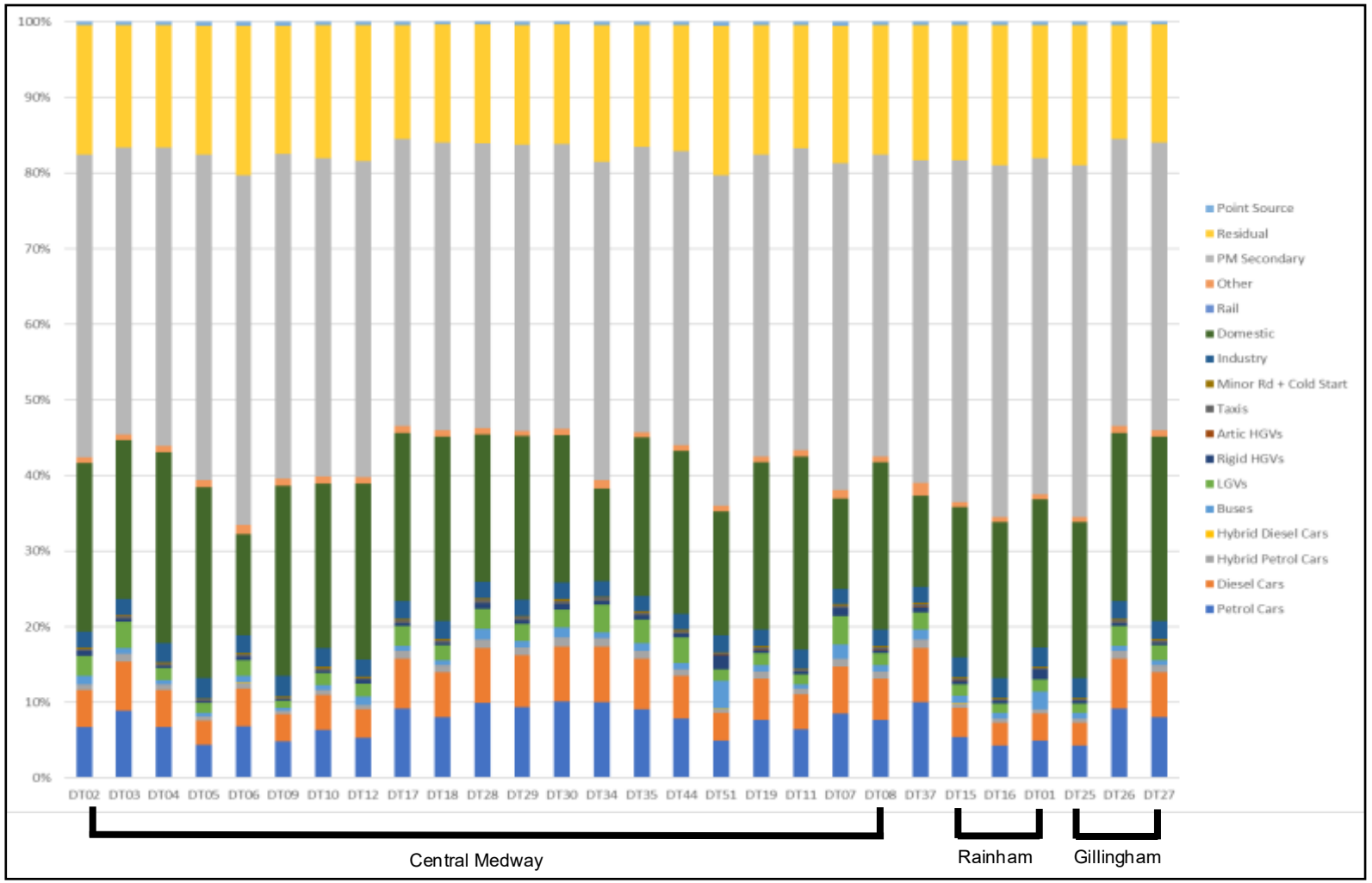
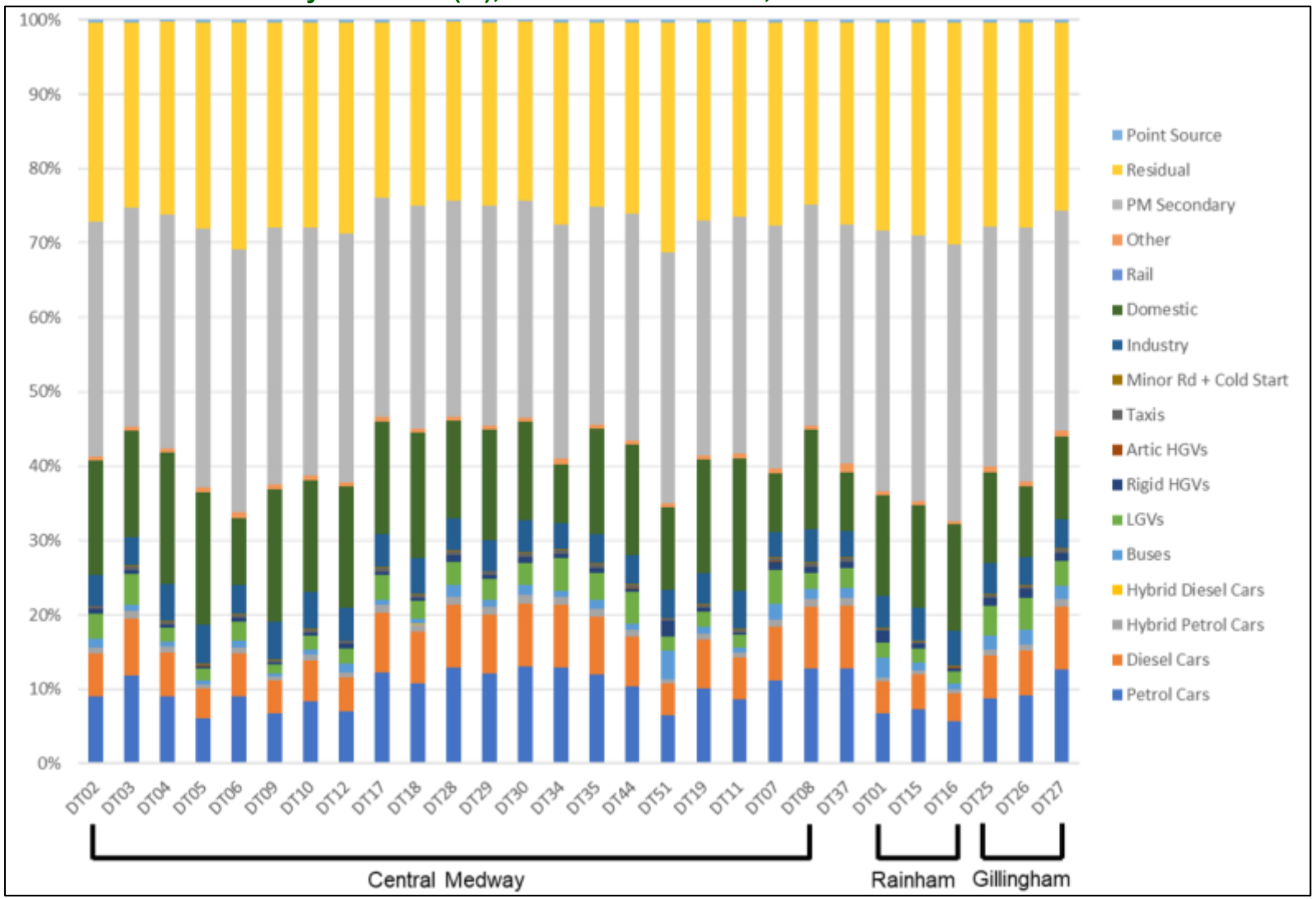


Figure 6 – Stacked bar chart showing PM_{10} source apportionment for road transport and background sources for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022



1.7 Required Reduction in Emissions

1.7.1 NOx and NO_2 emissions reductions

Table 2 sets out the required reduction in local emissions of NO_X that would be required at the two diffusion tube locations where exceedances were measured in 2022 (both in the Central Medway AQMA), in order for the annual mean NO_2 AQO to be achieved.

The degree of improvement needed in order for the annual mean NO_2 objective to be achieved is defined by the difference between the highest measured or predicted concentration and the objective level (40 µg/m^3). The highest NO_2 concentration was measured at DT06 (43.5 µg/m^3), requiring a reduction of 3.5 µg/m^3 in order for the objective to be achieved. At DT44, a concentration of 42.2 µg/m^3, requiring a reduction of 2.2 µg/m^3 in order for the objective to be achieved.

In terms of describing the reduction in emissions required, it is more useful to consider NO_X. The required reduction in local NO_X emission has been calculated in line with guidance presented in Box 7-6 of LAQM.TG(22). Table 2 shows that at DT06, where the highest annual mean concentration was measured, a reduction of 13.0% in local road traffic NOx emissions would be required in order to achieve the objective. At DT44, the required reduction in local road traffic emissions of NOx is 8.4%.

Table 2 – Improvement in Annual Mean NO_2 Concentrations and road NOx Concentration Required to Meet the Objective

Receptor	Required reduction in annual mean NO_2 concentration (µg/m^3)	Required reduction in emissions of NO_X from local roads (%)
DT06	3.5	13.0%
DT44	2.2	8.4%

1.7.2 Scenario Modelling

To understand the impact that different policy measures could have on air quality in Medway, scenarios relating to three of the AQAP actions outlined in Table 4 have been modelled to calculate the likely reduction in emissions:

1. Explore opportunities to support electrification of the bus fleet in Medway, focusing on routes through the AQMAs (Measure 17)
2. Explore opportunities to set up an ECOStars (or similar) Freight Recognition Scheme for Medway (Measure 8)
3. Deliver the EV Strategy 2022-27 (Measure 14)

For each measure, three scenarios were developed to represent increasingly ambitious uptake/implementation of the AQAP measure. Pollutant emissions and concentrations have been calculated for each scenario and compared to the baseline scenario to understand the potential impact of the measure on local air quality in Medway, and whether the required reductions outlined in the section above are able to be achieved.

As the three AQAP measures target different groups of vehicles (buses, freight, and cars), the sum of the predicted reductions in annual emissions can be used as an indicator for the expected changes. If all three of the AQAP measures above were implemented as per the most ambitious “High” scenarios, annual emissions of NOx from road transport could be reduced by almost 30%; CO_2 emissions could be reduced by more than 15% and particulate matter emissions could be reduced by around 8%. As shown in Table 2, the expected reduction in NOx emissions required to bring DT06 into compliance is 13.0%, and for DT44 is 8.4%, so there is good confidence that implementation of these measures (as well as the other actions outlined in this AQAP) will enable Medway to achieve compliance with the annual mean NO_2 AQO. This is further evidenced by the modelled improvements in NO_2 concentrations expected at these diffusion tube locations: overall, implementing the “high” scenario for the three measures is likely to bring diffusion tube **DT06** closer to compliance with the NO_2 AQO, with a cumulative reduction of 3.36 µg/m^3 (compared to a required reduction of 3.5 µg/m^3 to achieve compliance). The cumulative reduction in NO_2 from the implementation of the three “high” scenarios could be

expected to bring **DT44** into compliance with the NO_2, with a cumulative reduction of 4.38 µg/m^3 (compared to a required reduction of 3.5 µg/m^3 to achieve compliance).

The full set of results for this modelling exercise are provided in Appendix C: 2022 Baseline Model, Source Apportionment and Scenario Modelling Study.

1.8 Key Priorities

The most significant source of NOx emissions in the Central Medway, Gillingham and Rainham AQMA's is road transport. As discussed in Section 1.6, the source apportionment results show that diesel cars were the largest contributing vehicle type to NOx emissions at diffusion tube monitoring sites.

The key priorities for this AQAP have been determined by Medway Council and the AQAP Steering Group.

- Priority 1 – Bring about compliance with the Air Quality Strategy objectives across Medway, focusing on NO_2 concentrations within the Central Medway, Gillingham and Rainham AQMAs (as well as the Four Elms Hill AQMA, which is addressed in a separate AQAP). We are also working on building evidence to demonstrate this to enable the AQMAs to be revoked in the future.
- Priority 2 – Reduce NOx emissions from diesel (and petrol) cars in the Central Medway, Gillingham and Rainham AQMAs, by encouraging use of alternative modes of transport such as active travel and public transport, and by delivering the vision in our Electric Vehicle Strategy.
- Priority 3 – Reduce NOx emissions from buses, by assessing the potential to upgrade a proportion of the bus fleet to electric.
- Priority 4 – Reduce NOx emissions from HGVs, by exploring opportunities to set up a freight recognition scheme in Medway.
- Priority 5 – Reduce NOx emissions from taxis, using the evidence from the study currently being delivered, and working towards upgrading a proportion of the taxi fleet to ultra-low/zero emission vehicles.
- Priority 6 – Reducing emissions of $PM_{2.5}$ particulate matter across the borough.

Development and Implementation of Medway's AQAP

1.9 Consultation and Stakeholder Engagement

In developing this AQAP, we have worked with the local community and relevant Medway Council departments to improve local air quality. We have undertaken the following stakeholder engagement:

- Medway Council internal workshop in February 2024
- Public Consultation to be held during Summer 2024

The response to our consultation stakeholder engagement will be provided in Appendix A: Response to Consultation after the Public Consultation period has concluded.

Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 3.

Table 3 – Consultation Undertaken

Consultee	Consultation Undertaken
The Secretary of State	Being undertaken
The Environment Agency	Being undertaken
The highways authority	Being undertaken
All neighbouring local authorities	Being undertaken
Other public authorities as appropriate, such as Public Health officials	Being undertaken
Bodies representing local business interests and other organisations as appropriate	Being undertaken

1.10 Steering Group

Following the publication of Medway's first AQAP, a Steering Group was established in 2016 to provide oversight, and facilitate further development of the measures included. The Steering Group consists of representatives from key council services including, amongst others, Environmental Protection, Public Health, Planning and Integrated Transport, who have agreed to work together with the shared goal of seeking to improve air quality in Medway through behavioural, strategic and infrastructure change.

The Air Quality Steering Group was convened to help shape the Medway 2024 AQAP, including via a dedicated workshop held in February 2024.

AQAP Measures

Table 4 shows the Medway AQAP measures. It contains:

- a list of the actions that form part of the plan
- the responsible individual and departments/organisations who will deliver this action
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction
- the timescale for implementation
- how progress will be monitored

NB: Please see future ASRs for regular annual updates on implementation of these measures.

Table 4 – Air Quality Action Plan Measures

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
1	Identify and implement new cycling and walking opportunities	Promoting Travel Alternatives	Promotion of walking	Ongoing	Ongoing	**Sustainable Transport**	Active Travel Fund investment				Implementation	Low. Increasing routes will not directly reduce pollutant emissions, however, should encourage more people to walk/cycle more often, indirectly improving air quality.	Increase in number of cyclists; No. of additional walking / cycling routes created.	Annual walking festival organised in partnership with environmental and walking groups.	Seek to promote and integrate new active travel opportunities in new developments, specifically, strategic site allocations in the new Local Plan. Engage with universities, schools, and other large institutions (e.g. Medway Hospital) to identify and promote safe walking routes.
2	Work with partners to help develop and enhance National Cycle Routes in Medway	Promoting Travel Alternatives	Promotion of cycling	2024	Ongoing	**Sustainable Transport**					Implementation	Low. Increasing routes will not directly reduce pollutant emissions, however, should encourage more people to walk/cycle more often, indirectly improving air quality.	Increase in number of cyclists / journeys made via bicycle; No. of additional cycling routes created / no. of routes enhanced.	Medway Council developed the Medway Cycle Map in 2016 and the local cycling and walking infrastructure plan (LCWIP), which follows on from the Medway Cycling Action Plan, is undergoing consultation (Spring 2024).	Medway Council will participate in the development of a sub-regional cycle network and enhancement of the National Cycle Routes, along with partners such as Sustrans.
3	Maintain and promote existing healthy travel schemes	Promoting Travel Alternatives	Intensive active travel campaign & infrastructure	Ongoing	Ongoing	**Public Health**	Existing budgets				Implementation	Low. These schemes will not directly reduce pollutant emissions, however, should encourage more people to walk/cycle more often, indirectly improving air quality.	Increase in number of people walking / cycling; Continuation of existing schemes.	Medway Health Walks Scheme - Supports walking groups & use of local green spaces. GP exercise referral scheme - Physical activity and weight management programme encouraging walking instead of using private vehicles.	Promotion can take place via the updated Air Quality Communications Strategy.
4	Implement improvements recommended in the Local Cycling and Walking Infrastructure Plan (LCWIP)	Promoting Travel Alternatives	Promotion of Walking & Cycling	Ongoing	Ongoing	**Sustainable Transport**	Existing budgets and external funding sources				Planning	Low. Improving routes will not directly reduce pollutant emissions, however, should encourage more people to walk/cycle more often, indirectly improving air quality.	Improvements made to targeted cycle routes within / near the AQMAs; Increase in number of cyclists / journeys made via bicycle.	LCWIP is undergoing public consultation January to March 2024.	Targeted routes identified in the LCWIP that are located within/near AQMAs. Developing more off-road cycle facilities and on quiet roads.
5	Work with businesses and educational establishments to implement travel plans	Promoting Travel Alternatives	Workplace Travel Planning / School Travel Plans	2024	Ongoing	**Sustainable Transport**					Implementation	Medium. Implementation of travel plans can directly reduce pollutant emissions; however, success of this measure depends on uptake.	No. of local establishments producing active travel plans / workplace promotions / journey planning.	Mode Shift Stars accreditation scheme for school travel plans has been successful. Good progress being made to develop an integrated travel plan for Kingsnorth employment area.	Continue Mode Shift Stars accreditation scheme. Develop a workplace travel plan template.
6	Review and update the Air Quality Communications Strategy	Public Information	Other	2024	2025	**Public Health, Environmental Protection**	Existing budgets and/or external funding sources (e.g. Defra AQ grant)			<£10k	Planning	Low. Air quality communications will not directly improve air quality, but will raise awareness and may encourage people to change their behaviour, indirectly improving air quality.	Air Quality Communications Strategy is updated and published.	Discussions to ensure good collaboration with the Climate Change team to reflect AQ and climate change co-benefits.	Review and update the Air Quality Communications Strategy to bring the strategy up to date and reflect current priorities.
7	Solid fuel burning public information campaign	Public Information	Via the internet	2024	2025	**Public Health, Environmental Protection**	External budgets and/or external funding sources (e.g. Defra AQ grant)			<£10k	Planning	Low. Development of this campaign will not directly reduce pollutant emissions, but will raise awareness and may encourage people to change their open burning	Solid fuel burning campaign is published.	Public information campaign to raise awareness and highlight the impacts of open burning on air pollution, with a focus on health impacts. Highlight Defra's "Burn Better" Solid Fuel Burning Campaign	Future ambition: Campaign could also cover bonfires. Promotion can also take place via the updated Air Quality Communications Strategy.

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
												habits, indirectly improving air quality.		Burn Better Breathe Better campaignHighlight Medway's SCA and authorised fuels.	
8	Explore opportunities to set up an ECOStars (or similar) Freight Recognition Scheme for Medway	Freight and Delivery Management	Other	2024	2025	**Transport and Parking, Environmental Protection, Climate Response**	External funding sources (e.g. Defra AQ grant)			£50k-£100k	Planning	Medium. Such schemes help businesses to improve their fuel efficiency, reduce fuel consumption & emissions and make cost savings; these all help to reduce emissions of NOx and PM, but success depends on uptake. Modelling results indicate that an increase in fuel efficiency from Freight Management could result in up to: - 1.19% reduction in NO_2 concentrations. - 0.038% reduction in PM_{10} concentrations. - 0.058% reduction in $PM_{2.5}$ concentrations.	Set up freight recognition scheme; No. of local fleet operators in the scheme.	**Dispersion modelling of potential impacts of uptake undertaken as part of this AQAP.** This measure is at the scoping stage and aims to look at nearby local authorities that have an ECOStars (or similar) scheme in place, and identify local businesses that would be suitable candidates.	In total, ECOStars schemes have more than 500 members with 14,000+ vehicles Ecostars website
9	Integrate, where appropriate, AQAP targets into internal service plans	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2024	Ongoing	**Business Intelligence**					Implementation	Low. Inclusion of AQAP targets in other plans will not directly reduce pollutant emissions, but will help facilitate implementation of other actions to improve air quality.	No. of targets incorporated into other plans / policies.	The 2015 AQAP has been integrated into the Medway Climate Change Action Plan and the Four Elms Hill AQAP and this AQAP will also be integrated.	Future ambition: Integrate 2024 AQAP into upcoming plans e.g. new Local Plan, updated Local Transport Plan, etc. and included within the corporate performance monitoring system
10	Continue to review and update the Air Quality Planning Guidance 2016 (Revised 2021)	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2021	2026	**Environmental Protection**					Planning	Medium. The document sets out requirements for air pollution mitigation for developers, which will directly reduce NOx and PM emissions. However, success will be limited by enforcement of planning conditions.	Air Quality Planning Guidance is updated every 5 years (or less).	The revised guidance covers major sized developments and any development within or close to an AQMA and requires developers to include mitigation for air pollution in their developments.	Future ambition: Revise for 2026, or if there are any large developmental changes
11	Consider expansion of Medway's Smoke Control Area	Policy Guidance and Development Control	Regional Groups Co-ordinating programmes to develop Area wide Strategies to reduce emissions and improve air quality	2024	2025	**Noise and Nuisance, Environmental Protection**	Existing budgets			£10k-£50k	Planning	Medium. The expansion of Medway's Smoke Control Area would help further reduce emissions of NOx and PM. However, success will be limited by uptake / enforcement.	Expansion of the Smoke Control Area.	Parts of Medway Council's district are within a Smoke Control Area already.	Future ambition: Consider expanding the SCA to the whole of Medway Council's District. Include development of a bonfire policy.
12	Review and update the Medway Local Transport Plan	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	Ongoing	2025	**Transport and Parking**					Implementation	High. A refreshed Local Transport Plan will drive a shift towards increased public transport patronage and active travel, which leads to a reduction in NOx emissions from roadside traffic.	Updated Local Transport Plan is published.	This action is currently being implemented. The main focus is to create a timetable to refresh Medway's Local Transport Plan, with a particular focus on Medway's AQMAs.	New Local Plan timetable may affect delivery timelines.
13	Taxi and private hire ULEV feasibility study	Promoting Low Emission Transport	Taxi Licensing conditions / Taxi emission incentives	2022	2024	**Licensing, Environmental Protection**	DEFRA Air Quality Grant Programme	Yes		£100k-£500k	Implementation	High. Depending on the level of uptake, an increase in the proportion of ULEV taxis will directly reduce	Production of implementation plan; Number of ULEV taxis in Medway.	The study is currently underway, with engagement with the taxi and private hire trade to understand barriers and opportunities for	Future ambition: Consider recommendations from the feasibility study and

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
												exhaust emissions of NOx and PM.		converting to ULEV, as well as modelling the impacts of ULEV scenarios.	produce a plan for implementation.
14	Deliver the EV Strategy 2022-27	Promoting Low Emission Transport	Public Vehicle Procurement - Prioritising uptake of low emission vehicles	2022	2027	**EV Officer, Transport and Parking**					Implementation	Low. Provision of EV charging and other incentives to switch to EVs will not directly reduce air pollutant concentrations, but will help facilitate EV uptake. Modelling results indicate that an increase in the proportion of electric vehicles in the car fleet from a baseline of 1.89% to 26.56% could result in up to a: - 9.18% reduction in NO_2 concentrations. - 2.15% reduction in PM_{10} concentrations. - 1.52% reduction in $PM_{2.5}$ concentrations.	No. of EV charging points; Proportion of EVs in private vehicle fleet.	**Dispersion modelling of potential impacts of uptake undertaken as part of this AQAP.** The council are reviewing strategically located council owned sites for potential installation of rapid charging points for public use, including town centres, residential locations, and other destinations.	Future ambition: Ensure the future long-term sustainability of EV charging by integrating infrastructure into new development, as stipulated within Air Quality Planning Guidance and central government.
15	Explore opportunities to roll out the findings from the Rainham anti-idling campaign across other AQMAs	Traffic Management	Anti-idling enforcement	2023	2025	**Traffic Management, Street Works, Environmental Protection**	Defra AQ Grant and existing budgets	Yes		£10k-£50k	Planning	Medium. A reduction in idling will reduce exhaust emissions of NOx and PM, as a result of reduced idling. However, success will depend on uptake.	Implement anti-idling measures within AQMAs.	An anti-idling campaign was carried out across Rainham, and the findings suggest there would be benefits to rolling this out more widely across Medway.	Explore the possibility of extending the most successful aspects of the anti-idling campaign to AQMAs. Implement signage requirements at street works through permit system.
16	Replace Council fleet of small vehicles with low-emission alternatives at next point of exchange	Promoting Low Emission Transport	Company Vehicle Procurement - Prioritising uptake of low emission vehicles	2024	2027	**Council Fleet Managers, Climate Response**	Existing budgets and/or external funding sources				Planning	Medium. Upgrading vehicles in the Council's fleet will directly reduce exhaust emissions of NOx and PM, however, the scale of improvements will depend on the number and nature of the vehicles replaced.	No. of low emission small vehicles in Council Fleet.	Replace Council fleet of small vehicles (owned and leased) with electric by end of first carbon budget (2027) or where possible at next point of exchange (latest 2025) and once EV charge points are in place.	Additional staff resourcing is likely required (i.e. EV Strategy Delivery Officer and EV Fleet Manager). Funding is also likely to be the main barrier.
17	Explore opportunities to support electrification of the bus fleet in Medway, focusing on routes through the AQMAs	Promoting Low Emission Transport	Public Vehicle Procurement - Prioritising uptake of low emission vehicles	TBC	TBC	**Transport and Parking, Bus Operators**	External funding sources and/or operator investment			>£10million	Planning	High. Introduction of zero-emission buses to replace traditional buses in the BTS fleet will directly reduce exhaust emissions of NOx and PM. Modelling results indicate that upgrading all Euro 2, 3, 4 and 5 buses to electric vehicles could result in up to a: - 11.19% reduction in NO_2 concentrations. - 0.61% reduction in PM_{10} concentrations. - 0.93% reduction in $PM_{2.5}$ concentrations.	No. of zero-emission buses in Medway's bus fleet.	**Dispersion modelling of potential impacts of uptake undertaken as part of this AQAP.** Explore opportunities for phased uptake of ULEV on supported bus routes. Engaging with public transport providers.	Strong engagement with public transport providers required. Funding is likely to be the largest barrier to implementation.
18	Maintain availability and stability of key bus services in Medway	Transport Planning and Infrastructure	Public transport improvement - interchanges stations and services	Ongoing	Ongoing	**Transport and Parking, Bus Operators**					Implementation	Medium. Increased bus patronage reduces the number of vehicles on the road which also reduces congestion; this helps to reduce	Bus service provision; Bus service frequency and reliability; Bus patronage.	The Bus Service Improvement Plan (BSIP) was published in 2021; this action aims to improve frequency and reliability of bus services (BSIP target 1). The main actions are	Future ambition: Development of traffic management schemes that contribute to more reliable bus journey times.

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
												emissions of NOx and PM, but success depends on uptake.		to consider traffic management options to enable services to keep running and maintain / improve service quality.	Consideration of bus rapid transport networks.
19	Improve bus fares and ticketing	Transport Planning and Infrastructure	Public transport improvement - interchanges stations and services	2023	Ongoing	**Transport and Parking, Bus Operators**					Implementation	Medium. Increased bus patronage reduces the number of vehicles on the road which also reduces congestion; this helps to reduce emissions of NOx and PM, but success depends on uptake.	Bus service provision; Bus patronage.	The BSIP was published in 2021; this action aims to improve bus fares and ticketing (BSIP target 3). A trial of reduced fares was delivered in 2023 and further trials / offers will be delivered in 2024.	Future ambition: Investigate the potential for lower fares, including offers for children / students / the elderly / other concessions. Investigate the potential for simplified fares. Investigate potential to integrate ticketing between operators and transport modes.

Appendix A: Response to Consultation

The response to consultation will be added following Public Consultation of the Medway AQAP 2024.

Table A.1 – Summary of Responses to Consultation and Stakeholder Engagement on the AQAP

Consultee	Category	Response
		To be completed following consultation
		To be completed following consultation

Appendix B: Reasons for Not Pursuing Action Plan Measures

Table B- 1 – Action Plan Measures Not Pursued and the Reasons for that Decision

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Traffic Management	**Widen Darnley Arch.** Work with National Rail to widen Darnley Arch, which has been identified as a significant point of constriction on the highway network in Strood associated with poor air quality.	Measure was considered as it was included in the 2015 AQAP, but the opportunity for this has now passed. If a suitable situation arises in the future, the action (or similar) could be revisited.
Public Information	**Improve bus service information.** Expansion of the real-time information system and/ or text messaging service to all stops across the bus network, and enhanced promotion of bus services through all forms of media.	BSIP funding received so far has had the caveat of only being allowed for use on revenue-based schemes, which does not include these types of investments. Medway have been able to retain all bus services, unlike many other Councils, and this remains the priority at this time.
Public Information	**Promote and support the Kent and Medway Warm Homes Scheme and other domestic energy efficiency and fuel poverty projects.** Focus on projects being delivered through the Kent Energy Efficiency Partnership (KEEP), promote these schemes and advice already available online, highlight links between improving energy efficiency and reducing domestic emissions, thereby improving air quality.	Links more closely to the Housing Strategy and is more appropriately pursued via this.
Promoting Travel Alternatives	**Promote Medway Council staff sustainable travel options and expand offering.** Explore improvements to the Gun Wharf shower, changing, and cycle facilities to support improved active travel to work. Explore options to support additional sustainable travel incentives including staff cycle hire schemes,	Gun Wharf Office issues. There is appetite to take this forward, but resource is also an issue. Some preparatory work was previously done with the Energy Saving Trust, but unfortunately did not lead to anything further. Ad-hoc promotion of incentives available occurs.

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
	showers, cycle storage and improve the way the Council communicates about existing incentives for staff.	
Public Information	**Support residents and businesses to improve air quality by promoting funding opportunities and signposting to resources.** Green Homes Grant, Home Upgrade Grant (HUG) 2, LOCASE (Low Carbon Across the South East) grant support programme for local businesses. Highlight links between improving energy efficiency and reducing domestic emissions, thereby improving air quality.	The Green Homes Grant Scheme is no longer running (applications closed in 2022) and neither is the LOCASE scheme.
Freight and Delivery Management	**HGV route optimisation.** Review of HGV routes in Medway, with a focus on those through AQMAs, and develop solutions for optimisation.	The three AQMAs covered by this AQAP contain the main routes for HGVs through Medway, and it is not feasible to optimise those routes. This action has been replaced by an additional action to explore development of an ECOStars (or similar) freight recognition scheme for Medway, in the AQAP.
Freight and Delivery Management	**HGV Sat Nav Review and monitoring.** DfT data is available for a number of locations on the Medway road network, and includes locations within/near to AQMAs; this monitoring data should be used to supplement the research into HGV route optimisation.	Not being pursued as the action above is not being pursued. In addition, both actions have been replaced by an additional action to explore development of an ECOStars (or similar) freight recognition scheme for Medway, in the AQAP.
Policy Guidance and Development Control	**Explore opportunities to support implementation of zero-emissions-only HGVs and LGVs travelling through AQMAs.** Feasibility study for a Low Emission Zone-type system for LGVs and HGVs in Medway / Kent.	This action was considered to ensure alignment with the Four Elms Hill AQAP; however, is specific to the needs of Four Elms Hill and would not be feasible for wider adoption throughout Medway.
Policy Guidance and	**Introduce a Social Value Policy.** Introduce a Social Value Policy, embedding a scoring mechanism that favours emissions reduction.	This measure already sits in the Climate Change Action Plan. Social Value Policy Guidance has been drafted and is available for Council use; this sets the foundation for social value development and allows

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Development Control		the list of social values can be amended by officers (as is being employed in the Climate Change team). There is no need to pursue further in this AQAP, but the Social Value Policy Guidance can now be used.
Policy Guidance and Development Control	**Review transport provision policies for Home to School Transport and SEND transport functions.** Review transport provision policies, focusing on Home to School Transport and SEND transport functions, and explore the gradual changeover to Ultra Low Emission Vehicles for transportation of pupils under these functions.	Changes were made to the Education Travel Assistance Policy from September 2023; to promote personal development and independence skills and reduce the environmental impact of home to school travel, children and young people will be supported to use public transport wherever possible. This support may include travel training and/or the provision of a walking companion. A travel training service is being commissioned to promote and support walking to school and public transport use. Those who access shared SEN Transport, have been given the option to receive a bus pass as an alternative as part of the annual reapplication process to further encourage public transport use. Passes are also available to accompanying adults for those who still need support whilst the travel training service is set up. There are currently no specific timeframes on a gradual changeover to ULEVs for school and SEN Transport. This work is currently contracted out and this change would require significant investment, in an area which is already under significant budgetary pressure.
Promoting Low Emission Transport	**Review contractual obligations and assess capability of providers in transitioning to Ultra Low Emission Vehicles.**	Separate actions included in the AQAP are pursuing the uptake of ULEV taxis and ULEV buses, respectively.
Traffic Management	**Develop operational protocols to enable UTMC to respond to air pollution episodes.** Development of operational	This measure was included in the Local Transport Plan, which is due for review and update, and the action can be revisited at that time.

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
	protocols to enable Urban Traffic Management Control (UTMC) to respond to short-term air pollution episodes.	
Policy Guidance and Development Control	**Establish a public sector building retrofit programme in partnership with Kent County Council.** Focus on identifying joint initiatives that maximise economies of scale, e.g., shared building and facilities. Determine scope for a cross-sector location-based approach, identifying quick wins and how the Councils can work with private investors to scale up retrofit across Kent and Medway.	This measure is more appropriately pursued via other plans and policies. Air quality could be considered in Medway's Social Housing Decarbonisation scheme fund, which aims to improve the energy efficiency rating of HRA stock, and can be considered in future phases of the retrofit programme across 12 Council-owned buildings.
Public Information	**Develop a bonfire policy.** The Council has a responsibility to investigate complaints of smoke and fumes that could be classed as a 'statutory nuisance'; development of an educational Bonfire Policy could help reduce such incidents. Consider developing a Bonfire Policy to provide guidance for residents to make better decisions around when, where, and how to have their bonfires, by providing guidance; it should also inform residents about the human and environmental health impacts of bonfires.	Information on bonfires is already provided on the Council website; it can be provided in the Solid Fuel Burning Public Information Campaign, which is included as an action in this AQAP, and promoted via the updated Air Quality Communications Strategy, also included as an action in this AQAP.
Policy Guidance and Development Control	**Review options for renewable energy generation on Council-owned land**. Explore the potential for large scale solar PV generation on Council-owned land and through the acquisition of land from third parties.	This measure already sits in the Climate Change Action Plan and is more appropriately pursued via this. It is likely to be more impactful as an action in the strategic overview of renewable energy opportunities / local area energy requirements.
Promoting Low Emission Transport	**Support local SMES to switch to ULEVs via the Kent REVS and other similar schemes.** The scheme allowed any Kent business to try an electric vehicle for free for two months; Medway ranked 6th (across KCC and the other 12 participating Kent districts), with 26 vehicle loans administered throughout	This 2-year scheme has now ended and hasn't been replaced. Medway Council will continue to support SMES in accessing future schemes, if the opportunity arises.

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
	the duration of the trial to Medway businesses (10 for the 2021/22 and 16 in 2022/23).	
Policy Guidance and Development Control	**Undertake a renewable electricity and heat energy generation opportunities study for Kent and Medway.** Undertake a review to establish the potential for solar PV within Council owned car parks (solar canopies) and EV charging points, and large-scale sites (i.e., landfill).	Originally this action was driven by the Kent & Medway Energy and Low Emissions Strategy and also supported the need to refresh the 2010 Medway study. There has not been capacity / staffing to develop a further study. However, there are additional actions in the Climate Change Action Plan which would benefit from having a strategic overview of the renewable energy opportunities/local area energy requirements. Discussions with officers responsible for these actions in the Climate Change Action Plan will take place.
Alternatives to private vehicle use	**Explore / set up a shared transport scheme.** The shared transport scheme will primarily focus on promoting car clubs, with the aim of reducing the number of cars on roads.	A car share scheme is already available in Medway and is promoted via ongoing communication activity relating to the climate change action plan.
Vehicle Fleet Efficiency	**Centralise council vehicle mileage data collection.** Centralise data collection for Council vehicles, including mileage, maintenance, and replacements / upgrades. Use centralised data to inform implementation of emissions-saving measures; for example, fuel efficiency measures, planning for vehicle replacements and upgrades, etc.	This measure already sits in the Climate Change Action Plan, and is progressing well, so there is no need to pursue in the AQAP.
Promoting Low Emission Transport	**Ensure that all new technologies and ULEV options are considered when designing the new operations depot (Maidstone Road).**	The depot is not licenced for waste activities so cannot be used for associated fleet decarbonisation.
Promoting Low Emission Transport	**Review potential emission reduction options for Refuse Collection Vehicles (RCV) fleet.** Review potential emission reduction options for RCV fleet including impact on service	Independent assessment in 2021 concluded that electrification of the fleet is not possible at the depot due to grid infrastructure constraints. Subject to cabinet approval the replacement of the 2013 Euro 5 fleet will be see Euro 6 vehicles combined with electric lifts and solar

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
	design, available infrastructure, and fuel type. Develop strategy for phased replacement.	panels with engines optimized to maximise environmental benefits. This configuration was specified above the base models available at the quotation stage and represents the most decarbonizing technology available for this procurement.
Promoting Low Emission Transport	**Deliver phased replacement of RCV fleet with alternative fuel technology from 2030.**	Action not being pursued due to limitations described regarding the two actions above.
Transport Planning and Infrastructure	**Introduce an Enhanced Bus Partnership with the local bus operator(s).** Maintain productive relationships with local bus operators in line with the delivery of the BSIP via an Enhanced Partnership. Continue discussions with local bus operators as a longer-term ambition for them to move towards ULEV on their services. Work with local bus operators to deliver the BSIP; focus on the introduction of electric buses in Medway, including the identification of funding opportunities at national level.	Action to introduce an Enhanced Bus Partnership is complete, and a separate action in the AQAP looks to explore opportunities to support electrification of the bus fleet, including air dispersion modelling undertaken as part of this AQAP.
Transport Planning and Infrastructure	**Improve planning and integration of bus services with other modes of transport.** This measure aims to implement BSIP Target 2 and includes actions such as: integrate services with other transport modes, simplify services, review socially necessary services, consider investment in Superbus networks, and expansion of Quality Public Transport Corridors routes to support services.	BSIP funding received so far has had the caveat of only being allowed for use on revenue-based schemes, which does not include these types of investments. Medway have been able to retain all bus services, unlike many other Councils, and this remains the priority at this time. BSIP targets 1 and 3 are being pursued in the AQAP.
Transport Planning and Infrastructure	**Improve bus passenger experience.** This measure aims to implement BSIP Target 4, including actions such as: invest in improved bus specifications, invest in accessible and inclusive bus services, review of bus stop locations and facilities, protect	BSIP funding received so far has had the caveat of only being allowed for use on revenue-based schemes, which does not include these types of investments. Medway have been able to retain all bus services, unlike many other Councils, and this remains the priority at this time. BSIP targets 1 and 3 are being pursued in the AQAP.

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
	personal safety of bus passengers, improve buses for tourists, and the introduction of bus stop improvements.	
Policy Guidance and Development Control	**Review parking standards.** Review current parking standards policies and/or arrangements, and ensure consideration is given to the successful management of EV parking bays as they are rolled out.	There is currently no timeline available for the review of parking standards in Medway. The successful management of EV parking bays can be considered as part of the Medway EV Strategy, which is included in this AQAP.
Policy Guidance and Development Control	**Assist in development of the Tree Strategy and Action Plan.** Support the delivery of actions in the Tree Strategy including: ensuring no net loss of Street or Open Space Trees within Medway, continuing to deliver the tree planting programme, and continuing to respond to further funding opportunities to support tree planting outside of the standard programme. Ensure the developing Tree Strategy considers air quality (for example, choice and placement of vegetation).	The Tree Strategy is to be presented to the Cabinet in Spring 2024. Medway will continue to deliver the tree planting programme, and air quality should remain a consideration, however, as the plan is already finalised this does not need to be pursued in this AQAP.

Appendix C: 2022 Baseline Model, Source Apportionment and Scenario Modelling Study

Introduction

Medway Council engaged Ricardo to provide an air quality modelling and source apportionment assessment as part of the process of reviewing and updating the existing 2015 Air Quality Action Plan (AQAP).

This report summarises the findings from the 2022 baseline air quality model and source apportionment, as well as the estimated impacts of scenarios representing three AQAP measures, on emissions and concentrations of nitrogen dioxide (NO_2) and particulate matter (PM_{10} and $PM_{2.5}$). Total CO_2 emissions and reductions are also presented for those measures in comparison with the 2022 baseline modelling.

2022 Baseline model

Model selection

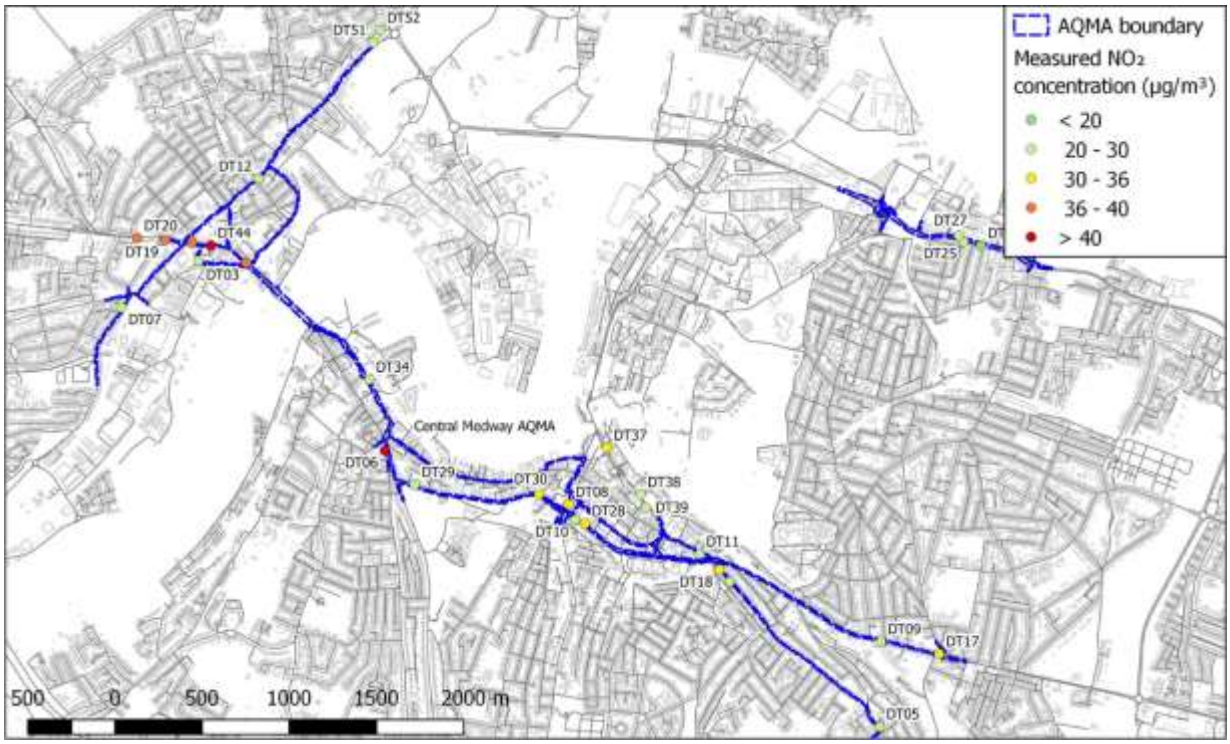
The RapidAir® air quality modelling software was used to predict air pollutant concentrations for this study. This is Ricardo's proprietary modelling system developed for urban air pollution assessment. RapidAir has been developed to provide graphic and numerical outputs which are comparable with other models used widely in the United Kingdom. The air dispersion modelling approach is based on loose coupling of two elements:

- Convolution of an emissions grid with dispersion kernels derived from the USEPA AERMOD model, at resolutions ranging from 1 m to 20 m. AERMOD provides the algorithms which govern the dispersion of the emissions and is an accepted international model for road traffic studies.
- The kernel based RapidAir model running in GIS software to prepare dispersion fields of concentration for further analysis with a set of decision support tools coded in Python/arcpy.

Model domain

Figure A- 1 presents the model domain used for the assessment, including the three Medway Air Quality Management Areas (AQMAs) covered by this AQAP (Central Medway; Pier Road, Gillingham; and High Street, Rainham), and the air quality monitoring locations used in the assessment.

Figure A- 1 – Model domain and monitoring locations used in the assessment



Base year and meteorological dataset

The 2022 surface meteorological data was obtained from three stations (Biggin Hill, Shoeburyness Landwick, and Southend) and upper air meteorological data was obtained from two stations (Herstomonceux and Larkhill). RapidAir was used to carry out data filling where necessary. Data gaps from the primary meteorological stations (Biggin Hill and Herstomonceux) were first filled using data from the other nearby stations (Shoeburyness Landwick, and Southend for surface stations, and Larkhill for the upper air station). Remaining data gaps were filled based on the persistence method, where a missing value is replaced by the use of data from the previous hour(s), for data gaps up to and including three hours.

Road locations

A realistic representation of road locations has been modelled by assigning emissions to the road links represented in the local transport model provided by Medway Council. It contains spatially accurate road centreline locations for various road categories (e.g. motorway, A road, B road, minor road, local street, etc.).

Street canyons

The presence of buildings either side of a road can introduce 'street canyon' effects which result in pollutants becoming trapped, leading to increased pollutant concentrations. There are canyon effects present in Medway, which may be contributing to air quality issues in the study area.

Street canyon impacts were modelled using the RapidAir canyon module. Building heights were obtained from the Ordnance Survey MasterMap Topography Layer data.

Road transport modelling

Average daily vehicle flow and speeds

Annual average daily traffic (AADT) link flows and daily average speed for each modelled road link were taken from the local traffic model, provided by Medway Council. AADT was adjusted to be representative of the baseline year (2022) using Trip End Model Presentation Program TEMPro growth factors[35].

A typical UK weekday diurnal profile (sourced from the Department for Transport) was assumed and applied as time varying emissions in AERMOD when creating the RapidAir dispersion kernel.

[35] Trip End Model Presentation Program (TEMPro) download

Vehicle fleet composition

Vehicle fleet composition data for 2022 were applied from the best available local (Medway) and national data, based on best scientific knowledge. Vehicle emissions rates for buses, taxis, coaches, rigid HGVs, articulated HGVs, LGVs, cars and motorcycles have been calculated using the COPERT v5.6 emissions functions contained in the latest version of the Defra Emissions Factors Toolkit (EFT) (v12.0.1)[36].

The traffic model provided vehicle flows for four highway user classes which were: Cars/Taxis, light goods vehicles (LGVs), and heavy goods vehicles (HGVs)/Buses.

The highway user classes for Cars/Taxis and HGVs/Buses were separated using automatic number plate recognition (ANPR) data recorded in Medway during November 2023[37]. A further breakdown of the HGV class into rigid and articulated categories was conducted using the same ANPR study. Similarly, the car class has been further split using the ANPR data into diesel, petrol, and hybrid (plug-in petrol hybrid, full petrol hybrid, plug-in diesel hybrid) vehicles. Taxis within Medway were modelled as either passenger cars (for private hire vehicles; PHVs) or as taxis (for black cabs). The proportion of cars which could be attributed to taxis was again based on the local ANPR study.

NOx/NO_2 conversion

Link-specific NOx and PM emissions factors were calculated using the COPERT v5.3 emission functions for all vehicles up to and including Euro 6/VI. Emissions rates were calculated using the Emissions Factor Toolkit (EFT) (v12.0.1)[38].

The most recent version (v8.1) of the Local Air Quality Management (LAQM) NOx to NO_2 conversion toolkit[39] was used to convert road NOx and background NOx into NO_2

[36] EFT V12.0.1, LAQM, December 2023, Emissions Factors Toolkit

[37] Ricardo deployed remote sensing instrumentation in Medway over a period of 9 days during November 2023. Measurements were made at two locations in Medway: London Road eastbound, up the hill from the Caldew Avenue bus stop, and New Road Avenue (A2) eastbound from the traffic lights.

[38] EFT V12.0.1, LAQM, December 2023, Emissions Factors Toolkit

[39] NOx to NO2 calculator, LAQM, August 2020, NOx to NO2 Calculator

concentrations where results at discrete receptor locations were required. This includes all roadside and kerbside 2022 NO_2 monitoring site locations in proximity to modelled road links.

The borough-wide domain was modelled at a 1 m resolution. When calculating NO_2 for large model domains and high-resolution models, using the LAQM NOx to NO_2 conversion spreadsheet tool for the conversion is not practical. In this case, a statistical relationship was derived using an ordinary least squares (OLS) regression model. The OLS model was derived by defining background NO_x, road NOx and road fNO_2 as the independent variables, and total NO_2 as the dependent variable.

Background concentrations

Background NOx and PM values were obtained from background mapping data for local authorities available on the LAQM website.[40] The 2022 background maps (2018 base year) were applied to the study. The contribution from local road transport sources sectors that were included in the air quality model were subtracted from the background maps to avoid double counting. Due to the geographic location of the modelling domain, background concentration data were sourced from the Southern England regional data set.

Measured concentrations

Medway Council's 2022 NO_2 measurements were applied to the air quality modelling assessment in order to verify the model outputs and to inform the source apportionment analysis. Measurements were applied from 28 monitoring sites which were confirmed as having sufficient data capture for the 2022 base year and in locations where concentrations would be accurately represented in the air quality model. A map showing the sites at which NO_2 concentrations were measured during 2022 is presented in Figure A- 1, with a majority of these being located in and around the AQMAs, and on the main road links in Medway.

[40] Background Mapping data for local authorities – 2018, Background Mapping data for local authorities - 2018

Model verification

To evaluate model performance and uncertainty, the Root Mean Square Error (RMSE) for observed vs predicted NO_2 annual mean concentrations was calculated, as detailed in Technical Guidance LAQM.TG(22).

A single road NOx (global) adjustment factor of 3.98 was derived from the model verification, and was applied to the calculation of modelled concentrations at specified air quality monitoring locations. In the absence of sufficient PM data for verification, the road NOx adjustment was applied to the modelled road PM_{10} and $PM_{2.5}$ outputs. This is the recommended methodology from Technical Guidance LAQM.TG(22).

Total NO_2 concentrations at specified receptors were obtained from background and adjusted road NOx concentrations using the NOx to NO_2 calculator provided by Defra. Where annual NO_2 concentration maps were required, total NO_2 was derived using the specified equation. The equation was determined by plotting total modelled NO_2 vs total modelled NOx at the specified receptor points:

(NO_2 in µg/m^3) = –0.000530 (NOx in µg/m^3)^2 + 0.500(NOx in µg/m^3) + 6.08

Technical Guidance LAQM.TG(22) indicates that a RMSE of up to 10% of the target limit value (4 µg/m^3, considering a 40 µg/m^3 limit value for NO_2) is ideal, and an RMSE of up to 25% of the target limit value (10 µg/m^3) is acceptable. In the global case the RMSE was calculated at 7.02 µg/m^3, which is acceptable and shows agreement between the modelled and measured concentrations.

Baseline Model results – NO_2

Figure A- 2 presents a map of modelled NO_2 concentrations across Medway for 2022. Air quality in Medway is generally good, and well below the annual mean AQO in most locations. As is to be expected, elevated concentrations of NO_2 are found on and surrounding the main roads in Medway, including within the AQMAs.

Figure A- 2 – Modelled NO_2 concentrations across Medway in 2022

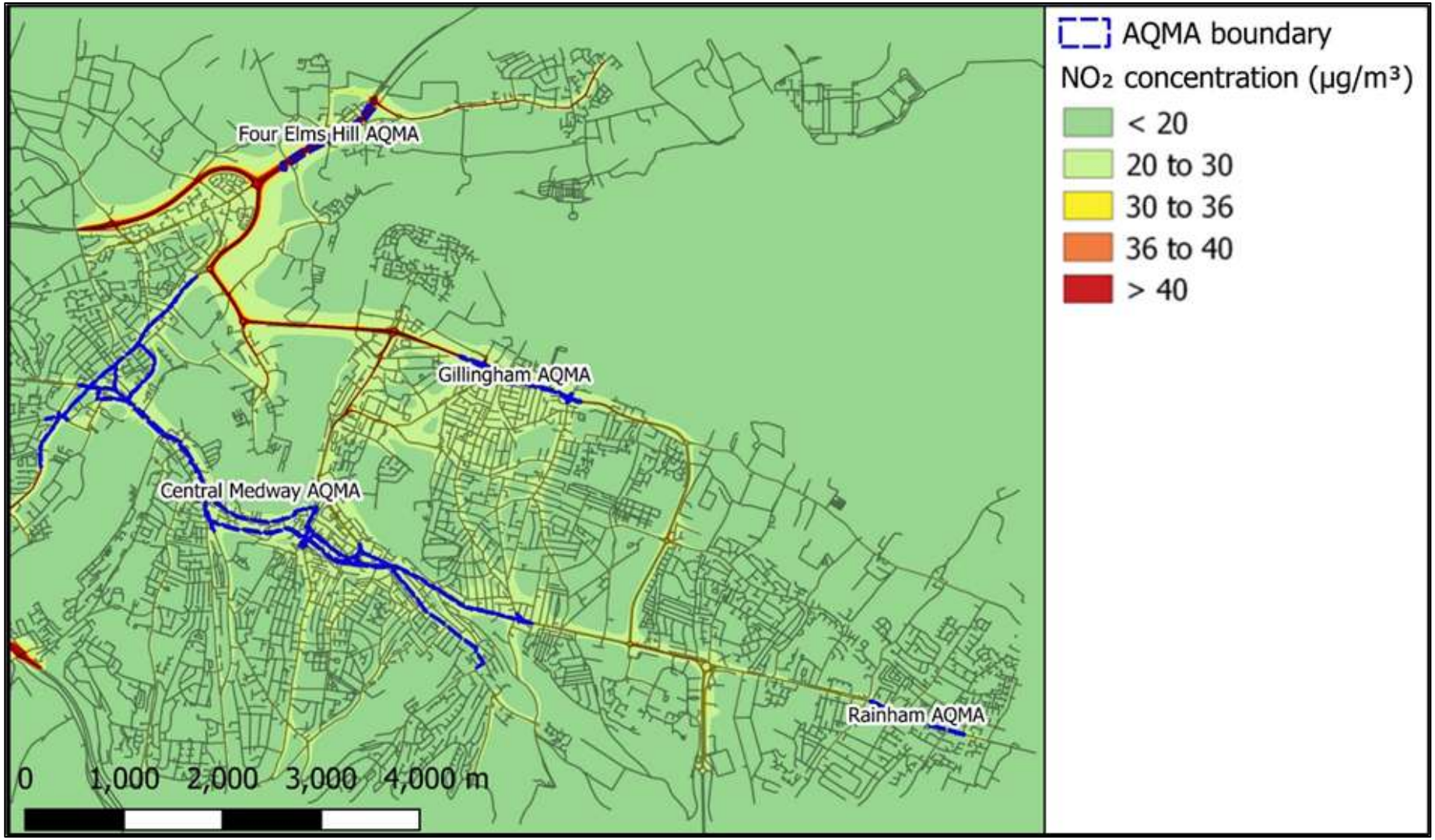


Figure A- 3 shows a map of modelled NO_2 concentrations across the Central Medway AQMA in 2022. Modelled NO_2 concentrations exceed 40 µg/m^3 along the majority of the A2. The highest concentrations are found along points of congestion, including where traffic from High Street joins the A2 at Corporation Street (see inset below).

Figure A- 3 Modelled NO_2 concentrations across Central Medway AQMA in 2022



Figure A- 4 shows a map of modelled NO_2 concentrations across the Gillingham AQMA in 2022. Modelled NO_2 concentrations exceed 40 µg/m^3 along Pier Road (A289). The highest concentrations are found along points of congestion, for example where the B2004 joins the A289 and at The Strand Roundabout.

Figure A- 4 – Modelled NO_2 concentrations across Pier Road, Gillingham AQMA in 2022

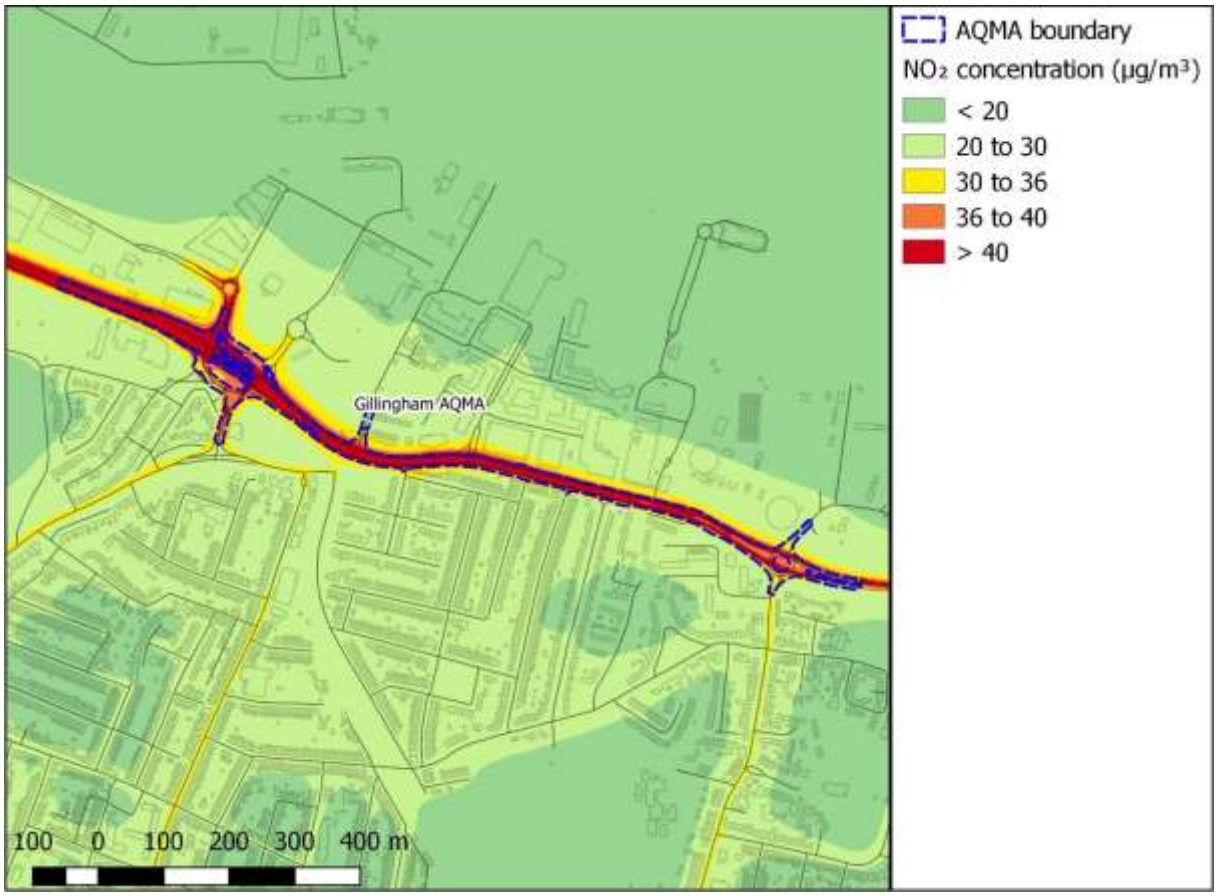


Figure A- 5 shows a map of modelled NO_2 concentrations across the Rainham AQMA in 2022. Modelled NO_2 concentrations are all below 36 µg/m^3. The highest concentrations are found along where Orchard Street meets the A2.

Figure A- 5 – Modelled NO_2 concentrations across High Street, Rainham AQMA in 2022



Source apportionment

Data sources and methodology

This section provides the data sources and methodology for the source apportionment study performed as part of the Medway AQAP 2024 baseline modelling assessment.

Figure A- 6 provides a schematic of the workflow and data used to inform the source apportionment study. A source apportionment of modelled road emissions was conducted using data from the closest modelled road link(s) to the specified 2022 air quality monitoring locations in Medway. The modelled road link emissions were then separated by vehicle type, based on the 2022 baseline scenario.

Background emissions were included in the source apportionment by assigning each monitoring site to its equivalent Defra background map[41] 1 km x 1 km grid square (based on location of the site across Southern England).

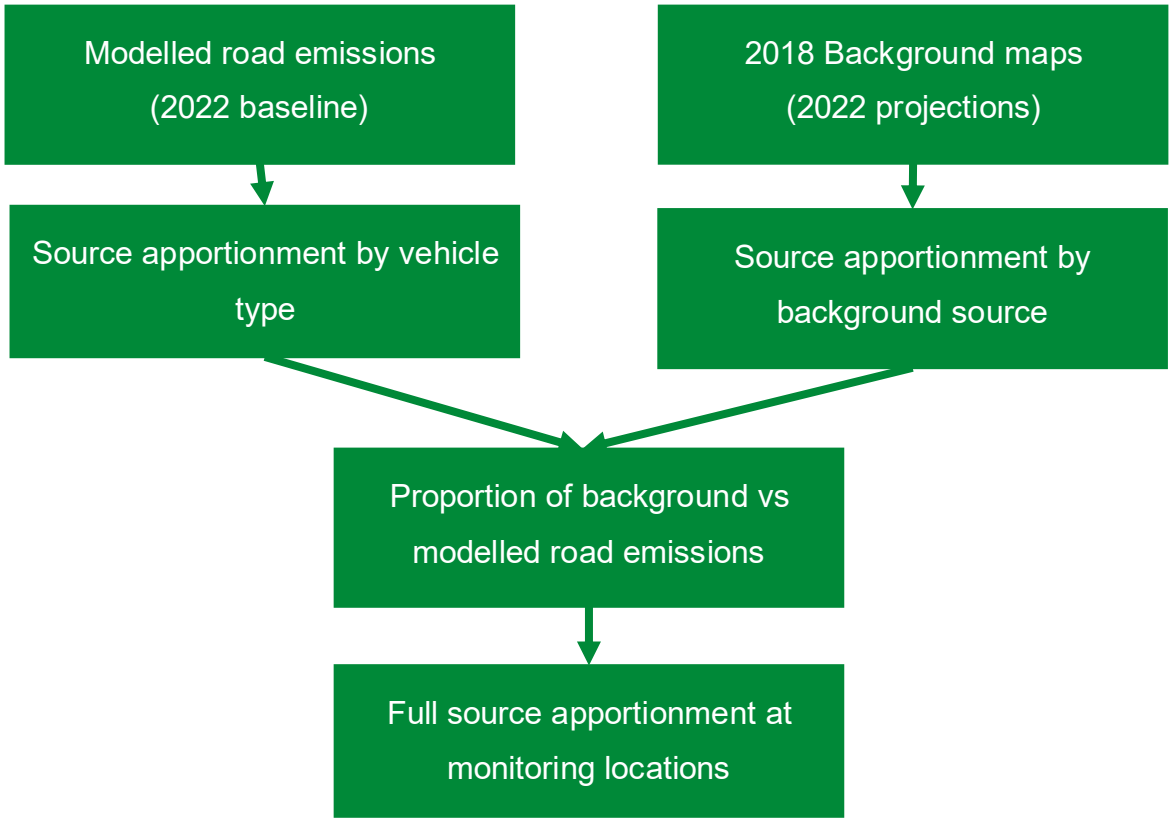
To avoid double counting, the explicitly modelled roads were removed from the Defra background maps; these included motorway, primary and trunk roads, brake and tyre wear, and road abrasion. The remaining background emissions were then included in the source apportionment.

A ratio of road to background emissions was calculated for each monitoring location using the modelled concentration outputs. The calculated ratio was then applied to combine the road and background source apportionment datasets, providing a full source apportionment at each monitoring location.

Finally, an attempt at calculating indicatory concentration values for each source category was performed by multiplying the total measured (where possible) and/or modelled concentrations by the percentage contribution from each source. This helps to provide a clearer picture with regards to the significance of the source at each location.

[41] Background Mapping data for local authorities, Background Mapping data for local authorities

Figure A- 6 Workflow and data used to calculate source apportionment



Source apportionment results

The results from the source apportionment calculations are presented in the form of stacked column bar charts in the following figures. This is to illustrate the contributions of each source at monitoring locations within the three AQMAs for each of the pollutants of concern. The results are also presented in tables.

In addition, the measured NO_2 concentrations in 2022 at the monitoring locations have been broken down, in order to provide an indication of the NO_2 concentration that can be attributed to each source at each monitoring location.

Figure A- 7 – Stacked bar chart showing NOx source apportionment for all road transport and background for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022

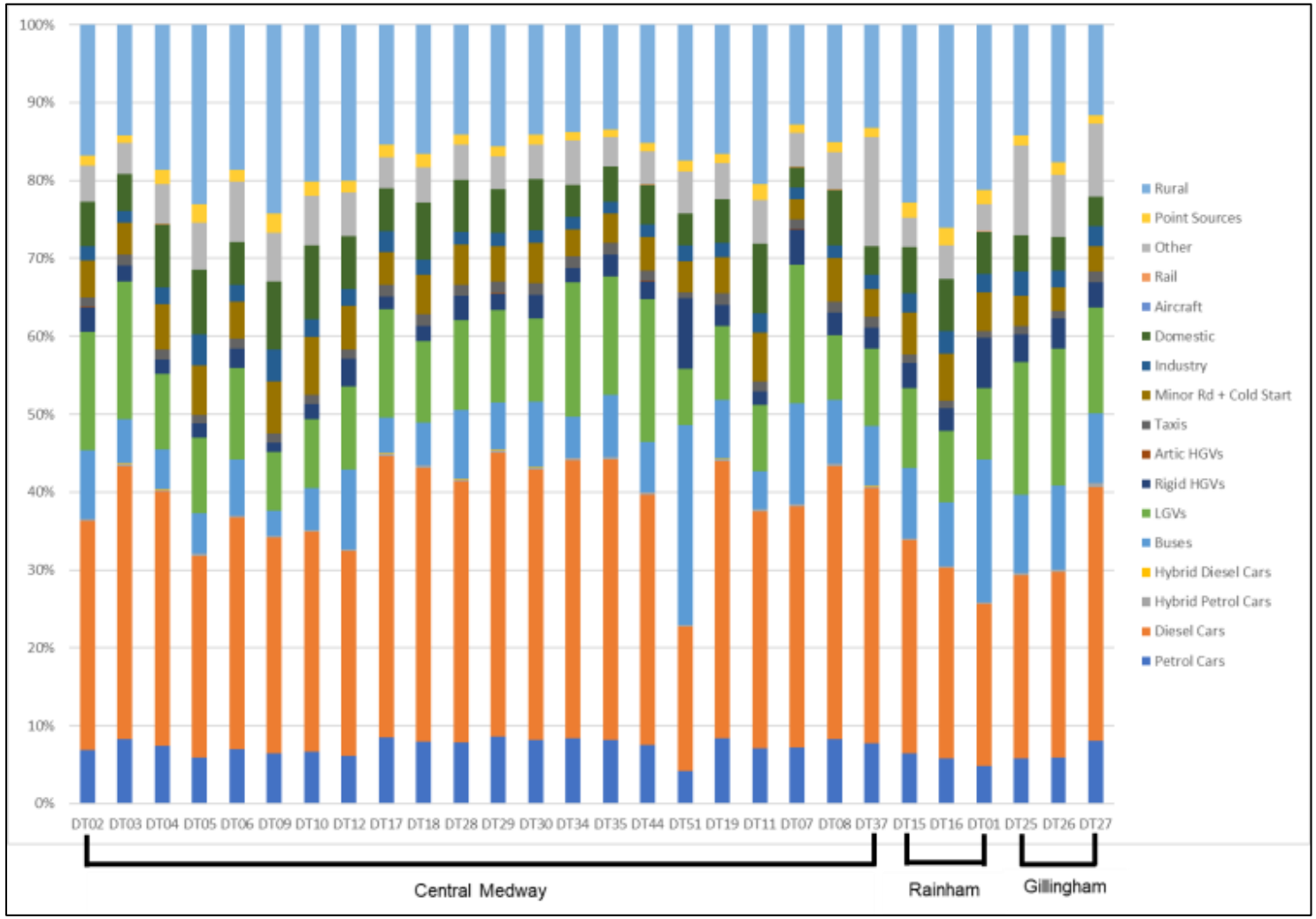


Table A- 1 – Breakdown of modelled NOx emissions at diffusion tube locations within AQMAs (% of total modelled NOx emissions) by source

Site ID	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT02	6.89%	29.40%	0.26%	0.02%	8.79%	15.25%	3.12%	0.02%	1.22%	4.76%	1.81%	5.68%	0.00%	0.04%	4.65%	1.25%	16.83%
DT03	8.24%	35.13%	0.31%	0.02%	5.63%	17.71%	2.00%	0.01%	1.46%	4.01%	1.53%	4.78%	0.00%	0.03%	3.92%	1.05%	14.16%
DT04	7.44%	32.62%	0.28%	0.02%	5.12%	9.70%	1.81%	0.01%	1.35%	5.75%	2.19%	8.13%	0.00%	0.03%	5.12%	1.82%	18.61%
DT05	5.91%	25.92%	0.22%	0.02%	5.17%	9.77%	1.83%	0.01%	1.07%	6.38%	3.98%	8.27%	0.00%	0.01%	6.01%	2.35%	23.07%
DT06	6.97%	29.74%	0.26%	0.02%	7.23%	11.65%	2.56%	0.02%	1.24%	4.75%	2.14%	5.50%	0.00%	0.03%	7.70%	1.54%	18.65%
DT09	6.49%	27.66%	0.25%	0.02%	3.24%	7.54%	1.15%	0.01%	1.15%	6.69%	4.17%	8.67%	0.00%	0.01%	6.30%	2.47%	24.20%
DT10	6.63%	28.26%	0.25%	0.02%	5.39%	8.86%	1.91%	0.01%	1.17%	7.40%	2.27%	9.53%	0.00%	0.03%	6.33%	1.84%	20.11%
DT12	6.16%	26.27%	0.23%	0.02%	10.25%	10.57%	3.64%	0.02%	1.09%	5.68%	2.16%	6.77%	0.00%	0.04%	5.55%	1.49%	20.05%
DT17	8.48%	36.17%	0.32%	0.02%	4.52%	13.94%	1.60%	0.01%	1.50%	4.26%	2.66%	5.52%	0.00%	0.01%	4.01%	1.57%	15.40%
DT18	8.00%	35.10%	0.30%	0.02%	5.50%	10.44%	1.95%	0.01%	1.45%	5.13%	1.96%	7.26%	0.00%	0.02%	4.58%	1.63%	16.63%
DT28	7.85%	33.48%	0.30%	0.02%	8.89%	11.52%	3.15%	0.02%	1.39%	5.20%	1.60%	6.69%	0.00%	0.02%	4.45%	1.29%	14.13%
DT29	8.56%	36.52%	0.32%	0.02%	6.04%	11.86%	2.14%	0.01%	1.52%	4.57%	1.72%	5.58%	0.00%	0.01%	4.17%	1.36%	15.60%
DT30	8.14%	34.70%	0.31%	0.02%	8.47%	10.69%	3.00%	0.02%	1.44%	5.17%	1.59%	6.66%	0.00%	0.02%	4.42%	1.28%	14.06%

Site ID	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT34	8.38%	35.72%	0.32%	0.02%	5.24%	17.22%	1.86%	0.01%	1.48%	3.51%	1.58%	4.06%	0.00%	0.02%	5.68%	1.13%	13.76%
DT35	8.17%	36.05%	0.31%	0.02%	7.98%	15.15%	2.82%	0.02%	1.49%	3.81%	1.45%	4.54%	0.00%	0.03%	3.72%	1.00%	13.45%
DT44	7.54%	32.14%	0.29%	0.02%	6.43%	18.38%	2.28%	0.01%	1.34%	4.29%	1.63%	5.12%	0.00%	0.03%	4.20%	1.13%	15.17%
DT51	4.18%	18.56%	0.16%	0.01%	25.70%	7.17%	9.08%	0.06%	0.77%	3.98%	1.97%	4.12%	0.00%	0.02%	5.39%	1.36%	17.48%
DT19	8.34%	35.57%	0.32%	0.02%	7.61%	9.45%	2.70%	0.02%	1.48%	4.69%	1.79%	5.59%	0.00%	0.04%	4.58%	1.23%	16.57%
DT11	7.12%	30.38%	0.27%	0.02%	4.87%	8.50%	1.73%	0.01%	1.26%	6.32%	2.41%	8.95%	0.00%	0.03%	5.64%	2.01%	20.48%
DT07	7.25%	30.93%	0.27%	0.02%	12.89%	17.80%	4.57%	0.03%	1.29%	2.49%	1.54%	2.65%	0.00%	0.02%	4.40%	1.00%	12.84%
DT08	8.23%	35.09%	0.31%	0.02%	8.23%	8.21%	2.92%	0.02%	1.46%	5.53%	1.70%	7.12%	0.00%	0.02%	4.73%	1.37%	15.04%
DT37	7.69%	32.79%	0.29%	0.02%	7.67%	9.91%	2.72%	0.02%	1.36%	3.60%	1.83%	3.69%	0.00%	0.01%	14.02%	1.17%	13.21%
DT15	6.42%	27.37%	0.24%	0.02%	9.09%	10.18%	3.23%	0.02%	1.14%	5.30%	2.53%	5.88%	0.00%	0.01%	3.75%	2.02%	22.81%
DT16	5.76%	24.54%	0.22%	0.02%	8.16%	9.13%	2.89%	0.02%	1.02%	6.05%	2.88%	6.71%	0.00%	0.01%	4.27%	2.30%	26.02%
DT01NEW	4.87%	20.76%	0.18%	0.01%	18.33%	9.14%	6.50%	0.04%	0.86%	4.93%	2.35%	5.46%	0.00%	0.01%	3.48%	1.88%	21.19%
DT25	5.84%	23.47%	0.31%	0.01%	10.06%	16.94%	3.62%	0.02%	1.00%	3.92%	3.11%	4.68%	0.00%	0.01%	11.45%	1.35%	14.20%
DT26	5.93%	23.83%	0.32%	0.01%	10.71%	17.59%	3.85%	0.02%	1.02%	3.01%	2.20%	4.21%	0.00%	0.01%	8.01%	1.67%	17.61%

Site ID	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT27	8.10%	32.57%	0.44%	0.02%	8.97%	13.63%	3.23%	0.02%	1.39%	3.21%	2.54%	3.82%	0.00%	0.01%	9.36%	1.10%	11.60%

Table A- 2 – Breakdown of measured NO_2 concentrations (2022) at diffusion tube locations within AQMAs µg/m^3) by source

Site ID	Measured NO_2 concentration, 2022 (µg/m^3)	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT01	34.9	1.70	7.25	0.06	0.00	6.40	3.19	2.27	0.01	0.30	1.72	0.82	1.91	0.00	0.00	1.21	0.66	7.40
DT02	38.6	2.66	11.35	0.10	0.01	3.39	5.89	1.20	0.01	0.47	1.84	0.70	2.19	0.00	0.01	1.80	0.48	6.49
DT03	38.8	3.20	13.63	0.12	0.01	2.19	6.87	0.78	0.00	0.57	1.56	0.59	1.85	0.00	0.01	1.52	0.41	5.50
DT04	29.9	2.22	9.75	0.08	0.01	1.53	2.90	0.54	0.00	0.40	1.72	0.66	2.43	0.00	0.01	1.53	0.54	5.57
DT05	25.3	1.50	6.56	0.06	0.00	1.31	2.47	0.46	0.00	0.27	1.61	1.01	2.09	0.00	0.00	1.52	0.60	5.84
DT06	43.5	3.03	12.94	0.11	0.01	3.15	5.07	1.12	0.01	0.54	2.07	0.93	2.39	0.00	0.01	3.35	0.67	8.11
DT09	20.8	1.35	5.75	0.05	0.00	0.67	1.57	0.24	0.00	0.24	1.39	0.87	1.80	0.00	0.00	1.31	0.51	5.03
DT10	26.9	1.78	7.60	0.07	0.00	1.45	2.38	0.51	0.00	0.32	1.99	0.61	2.56	0.00	0.01	1.70	0.49	5.41
DT12	27.8	1.71	7.30	0.06	0.00	2.85	2.94	1.01	0.01	0.30	1.58	0.60	1.88	0.00	0.01	1.54	0.41	5.58

Site ID	Measured NO_2 concentration, 2022 ($\mu g/m^3$)	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT15	30.2	1.94	8.26	0.07	0.01	2.75	3.08	0.97	0.01	0.34	1.60	0.76	1.78	0.00	0.00	1.13	0.61	6.89
DT16	20.6	1.19	5.06	0.04	0.00	1.68	1.88	0.60	0.00	0.21	1.25	0.59	1.38	0.00	0.00	0.88	0.47	5.36
DT17	34.8	2.95	12.59	0.11	0.01	1.57	4.85	0.56	0.00	0.52	1.48	0.92	1.92	0.00	0.00	1.39	0.55	5.36
DT18	35.5	2.84	12.46	0.11	0.01	1.95	3.71	0.69	0.00	0.52	1.82	0.69	2.58	0.00	0.01	1.63	0.58	5.90
DT25	29.7	1.73	6.97	0.09	0.00	2.99	5.03	1.07	0.01	0.30	1.17	0.92	1.39	0.00	0.00	3.40	0.40	4.22
DT26	19.9	1.18	4.74	0.06	0.00	2.13	3.50	0.77	0.00	0.20	0.60	0.44	0.84	0.00	0.00	1.59	0.33	3.50
DT27	27.3	2.21	8.89	0.12	0.01	2.45	3.72	0.88	0.00	0.38	0.88	0.69	1.04	0.00	0.00	2.55	0.30	3.17
DT28	33.9	2.66	11.35	0.10	0.01	3.01	3.90	1.07	0.01	0.47	1.76	0.54	2.27	0.00	0.01	1.51	0.44	4.79
DT29	27.3	2.34	9.97	0.09	0.01	1.65	3.24	0.58	0.00	0.41	1.25	0.47	1.52	0.00	0.00	1.14	0.37	4.26
DT30	31.9	2.60	11.07	0.10	0.01	2.70	3.41	0.96	0.01	0.46	1.65	0.51	2.12	0.00	0.01	1.41	0.41	4.48
DT34	26.4	2.21	9.43	0.08	0.01	1.38	4.55	0.49	0.00	0.39	0.93	0.42	1.07	0.00	0.01	1.50	0.30	3.63
DT35	28	2.29	10.09	0.09	0.01	2.23	4.24	0.79	0.01	0.42	1.07	0.41	1.27	0.00	0.01	1.04	0.28	3.77
DT37	31.4	2.41	10.30	0.09	0.01	2.41	3.11	0.85	0.01	0.43	1.13	0.58	1.16	0.00	0.00	4.40	0.37	4.15
DT44	42.2	3.18	13.56	0.12	0.01	2.72	7.75	0.96	0.01	0.56	1.81	0.69	2.16	0.00	0.01	1.77	0.48	6.40

Site ID	Measured NO_2 concentration, 2022 ($\mu g/m^3$)	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT51	22.8	0.95	4.23	0.04	0.00	5.86	1.64	2.07	0.01	0.17	0.91	0.45	0.94	0.00	0.00	1.23	0.31	3.99
DT19	36.5	3.04	12.98	0.12	0.01	2.78	3.45	0.99	0.01	0.54	1.71	0.65	2.04	0.00	0.01	1.67	0.45	6.05
DT11	30	2.14	9.11	0.08	0.01	1.46	2.55	0.52	0.00	0.38	1.90	0.72	2.68	0.00	0.01	1.69	0.60	6.14
DT07	29.2	2.12	9.03	0.08	0.01	3.76	5.20	1.33	0.01	0.38	0.73	0.45	0.77	0.00	0.01	1.28	0.29	3.75
DT08	35.4	2.91	12.42	0.11	0.01	2.91	2.90	1.03	0.01	0.52	1.96	0.60	2.52	0.00	0.01	1.68	0.49	5.33

Figure A- 8 – Stacked bar chart showing PM_{10} source apportionment for all road transport and background for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022

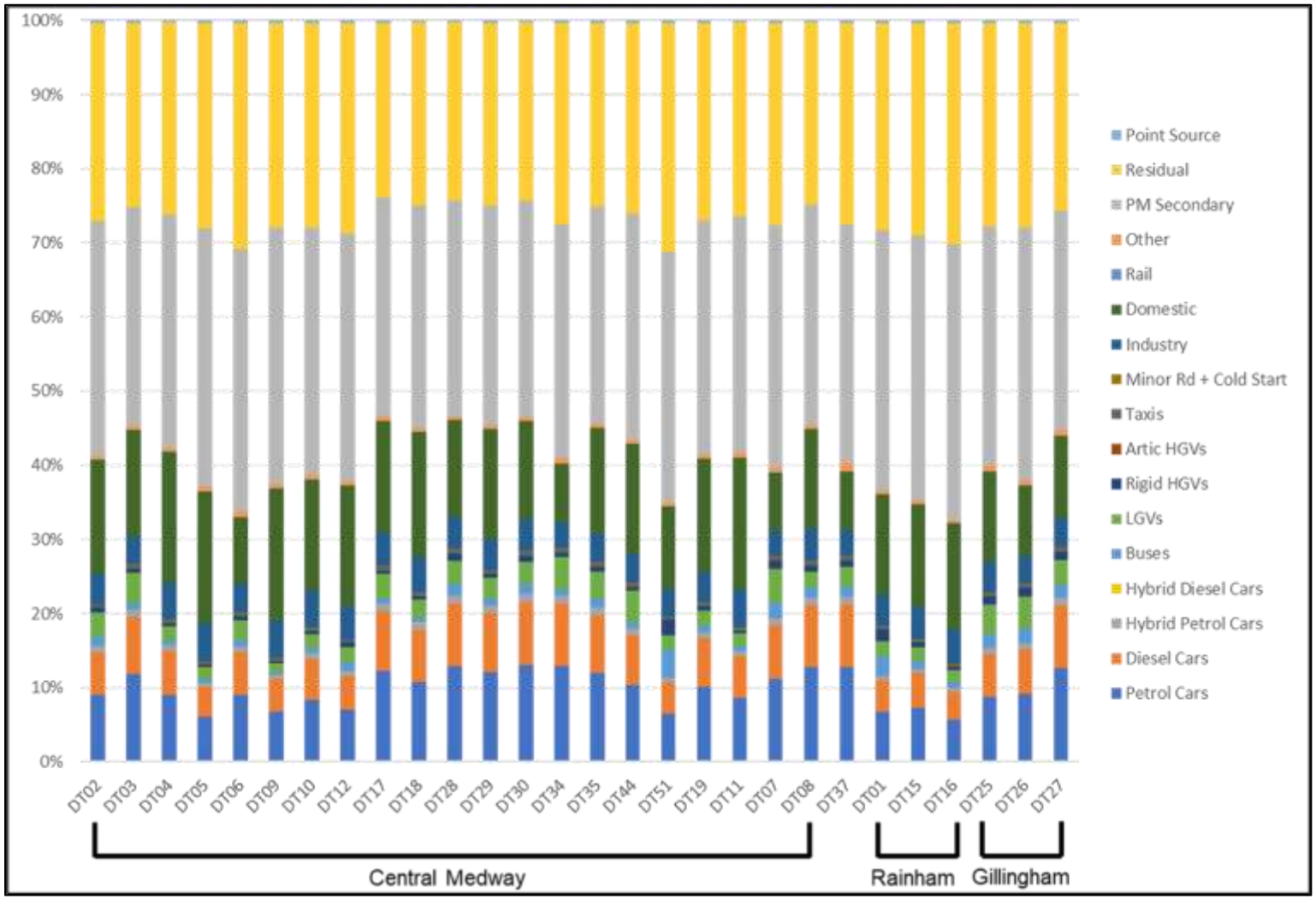


Table A- 3 – Breakdown of modelled PM_{10} emissions at diffusion tube locations within AQMAs (% of total modelled NOx emissions) by source

Site ID	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT02	8.97%	5.84%	0.79%	0.01%	1.18%	3.29%	0.68%	0.02%	0.39%	0.10%	4.15%	15.36%	0.00%	0.53%	31.61%	26.78%	0.31%
DT03	11.79%	7.67%	1.04%	0.01%	0.83%	4.20%	0.48%	0.01%	0.51%	0.10%	3.86%	14.31%	0.00%	0.50%	29.45%	24.95%	0.29%
DT04	9.02%	5.90%	0.79%	0.01%	0.61%	1.98%	0.35%	0.01%	0.39%	0.11%	5.03%	17.62%	0.00%	0.60%	31.44%	25.87%	0.28%
DT05	6.08%	3.98%	0.53%	0.00%	0.52%	1.69%	0.30%	0.01%	0.26%	0.11%	5.16%	17.82%	0.00%	0.72%	34.70%	27.75%	0.37%
DT06	8.97%	5.84%	0.79%	0.01%	0.96%	2.49%	0.56%	0.02%	0.39%	0.10%	3.92%	8.94%	0.00%	0.81%	35.30%	30.56%	0.36%
DT09	6.73%	4.39%	0.59%	0.01%	0.35%	1.30%	0.20%	0.01%	0.29%	0.11%	5.13%	17.72%	0.00%	0.72%	34.51%	27.60%	0.36%
DT10	8.42%	5.48%	0.74%	0.01%	0.70%	1.87%	0.41%	0.01%	0.36%	0.15%	4.90%	15.09%	0.00%	0.63%	33.36%	27.58%	0.30%
DT12	7.04%	4.58%	0.62%	0.01%	1.21%	2.00%	0.70%	0.02%	0.30%	0.11%	4.39%	16.27%	0.00%	0.56%	33.49%	28.37%	0.33%
DT17	12.29%	8.00%	1.08%	0.01%	0.68%	3.35%	0.39%	0.01%	0.53%	0.09%	4.38%	15.15%	0.00%	0.62%	29.51%	23.60%	0.31%
DT18	10.75%	7.03%	0.95%	0.01%	0.73%	2.36%	0.42%	0.01%	0.46%	0.11%	4.80%	16.82%	0.00%	0.57%	30.02%	24.70%	0.27%
DT28	12.90%	8.40%	1.14%	0.01%	1.51%	3.14%	0.87%	0.02%	0.55%	0.13%	4.27%	13.15%	0.00%	0.55%	29.07%	24.03%	0.26%
DT29	12.14%	7.91%	1.07%	0.01%	0.88%	2.79%	0.51%	0.01%	0.52%	0.10%	4.14%	14.81%	0.00%	0.49%	29.65%	24.66%	0.29%
DT30	13.03%	8.49%	1.15%	0.01%	1.40%	2.84%	0.81%	0.02%	0.56%	0.13%	4.28%	13.19%	0.00%	0.55%	29.17%	24.11%	0.26%

Site ID	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT34	12.89%	8.40%	1.14%	0.01%	0.83%	4.39%	0.48%	0.01%	0.55%	0.09%	3.49%	7.97%	0.00%	0.72%	31.46%	27.24%	0.32%
DT35	11.94%	7.82%	1.05%	0.01%	1.13%	3.73%	0.65%	0.02%	0.51%	0.09%	3.85%	14.25%	0.00%	0.49%	29.32%	24.84%	0.29%
DT44	10.31%	6.71%	0.91%	0.01%	0.91%	4.17%	0.53%	0.01%	0.44%	0.10%	4.00%	14.81%	0.00%	0.51%	30.47%	25.81%	0.30%
DT51	6.47%	4.25%	0.57%	0.01%	3.83%	1.88%	2.19%	0.06%	0.28%	0.08%	3.78%	11.09%	0.00%	0.52%	33.65%	30.98%	0.35%
DT19	10.06%	6.55%	0.89%	0.01%	0.95%	1.89%	0.55%	0.02%	0.43%	0.10%	4.14%	15.33%	0.00%	0.53%	31.53%	26.72%	0.31%
DT11	8.61%	5.60%	0.76%	0.01%	0.61%	1.70%	0.35%	0.01%	0.37%	0.11%	5.09%	17.85%	0.00%	0.61%	31.84%	26.20%	0.28%
DT07	11.14%	7.26%	0.98%	0.01%	2.04%	4.53%	1.18%	0.03%	0.48%	0.07%	3.34%	7.89%	0.00%	0.69%	32.67%	27.35%	0.33%
DT08	12.76%	8.31%	1.12%	0.01%	1.31%	2.11%	0.76%	0.02%	0.55%	0.13%	4.36%	13.44%	0.00%	0.56%	29.72%	24.56%	0.26%
DT37	12.81%	8.34%	1.13%	0.01%	1.32%	2.74%	0.76%	0.02%	0.55%	0.10%	3.52%	7.90%	0.00%	1.11%	32.10%	27.28%	0.30%
DT15	6.68%	4.35%	0.59%	0.01%	2.59%	2.08%	1.50%	0.04%	0.29%	0.09%	4.36%	13.50%	0.00%	0.46%	35.06%	28.05%	0.33%
DT16	7.22%	4.70%	0.64%	0.01%	1.05%	1.90%	0.61%	0.02%	0.31%	0.09%	4.45%	13.78%	0.00%	0.47%	35.78%	28.63%	0.34%
DT01	5.74%	3.74%	0.51%	0.00%	0.84%	1.51%	0.49%	0.01%	0.25%	0.10%	4.63%	14.34%	0.00%	0.49%	37.22%	29.78%	0.35%
DT25	8.77%	5.75%	0.78%	0.01%	1.81%	4.08%	1.05%	0.03%	0.38%	0.10%	4.25%	12.13%	0.00%	0.80%	32.23%	27.50%	0.33%
DT26	9.15%	6.00%	0.82%	0.01%	1.98%	4.35%	1.15%	0.03%	0.40%	0.06%	3.84%	9.52%	0.00%	0.60%	34.13%	27.60%	0.36%

Site ID	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT27	12.70%	8.32%	1.13%	0.01%	1.69%	3.42%	0.98%	0.03%	0.55%	0.09%	3.91%	11.16%	0.00%	0.74%	29.66%	25.31%	0.30%

Figure A- 9 – Stacked bar chart showing $PM_{2.5}$ source apportionment for all road transport and background for monitoring locations within Medway's AQMAs (%), for the baseline fleet, 2022

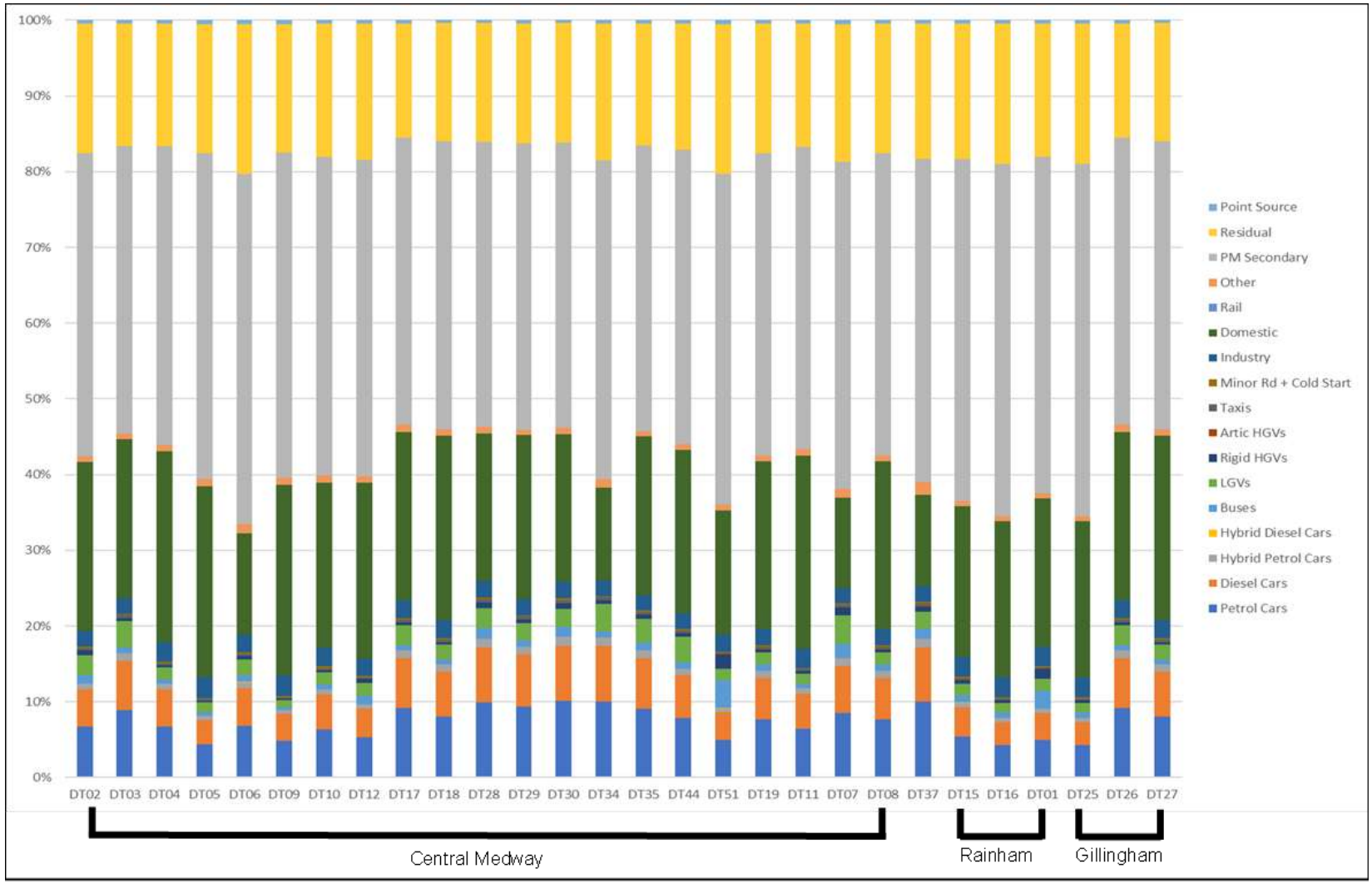


Table A- 4 – Breakdown of modelled $PM_{2.5}$ emissions at diffusion tube locations within AQMAs (% of total modelled NOx emissions) by source

Site ID	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT02	6.60%	4.79%	0.60%	0.01%	1.08%	2.60%	0.57%	0.02%	0.29%	0.15%	2.16%	22.39%	0.00%	0.77%	40.30%	17.26%	0.43%
DT03	8.95%	6.50%	0.81%	0.01%	0.79%	3.43%	0.41%	0.01%	0.40%	0.14%	2.04%	21.11%	0.00%	0.72%	38.00%	16.27%	0.41%
DT04	6.53%	4.78%	0.59%	0.01%	0.55%	1.55%	0.29%	0.01%	0.29%	0.16%	2.52%	25.44%	0.00%	0.85%	39.72%	16.32%	0.39%
DT05	4.61%	3.37%	0.42%	0.00%	0.50%	1.39%	0.26%	0.01%	0.21%	0.16%	2.69%	25.10%	0.00%	1.01%	42.79%	17.01%	0.48%
DT06	6.93%	5.03%	0.63%	0.01%	0.92%	2.07%	0.48%	0.01%	0.31%	0.16%	2.30%	13.39%	0.00%	1.21%	46.24%	19.80%	0.51%
DT09	5.20%	3.77%	0.47%	0.00%	0.33%	1.08%	0.17%	0.00%	0.23%	0.16%	2.67%	24.96%	0.00%	1.01%	42.55%	16.91%	0.48%
DT10	6.09%	4.42%	0.55%	0.00%	0.63%	1.45%	0.33%	0.01%	0.27%	0.22%	2.50%	21.97%	0.00%	0.90%	42.49%	17.73%	0.42%
DT12	5.13%	3.73%	0.46%	0.00%	1.10%	1.57%	0.57%	0.02%	0.23%	0.16%	2.26%	23.39%	0.00%	0.80%	42.10%	18.03%	0.45%
DT17	9.82%	7.12%	0.89%	0.01%	0.67%	2.88%	0.35%	0.01%	0.44%	0.14%	2.34%	21.89%	0.00%	0.88%	37.31%	14.83%	0.42%
DT18	7.80%	5.71%	0.71%	0.01%	0.66%	1.85%	0.34%	0.01%	0.35%	0.16%	2.44%	24.59%	0.00%	0.83%	38.40%	15.78%	0.38%
DT28	9.60%	6.97%	0.87%	0.01%	1.40%	2.51%	0.73%	0.02%	0.43%	0.20%	2.25%	19.74%	0.00%	0.81%	38.17%	15.92%	0.38%
DT29	8.68%	6.30%	0.79%	0.01%	0.79%	2.14%	0.41%	0.01%	0.39%	0.15%	2.20%	22.11%	0.00%	0.73%	38.73%	16.16%	0.42%
DT30	9.61%	6.97%	0.87%	0.01%	1.28%	2.25%	0.67%	0.02%	0.43%	0.20%	2.26%	19.84%	0.00%	0.81%	38.38%	16.01%	0.38%

Site ID	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT34	10.26%	7.45%	0.93%	0.01%	0.82%	3.76%	0.43%	0.01%	0.46%	0.14%	2.09%	12.15%	0.00%	1.10%	41.95%	17.97%	0.46%
DT35	8.96%	6.57%	0.81%	0.01%	1.07%	3.04%	0.55%	0.02%	0.40%	0.14%	2.03%	21.08%	0.00%	0.72%	37.95%	16.25%	0.40%
DT44	7.69%	5.58%	0.70%	0.01%	0.84%	3.35%	0.44%	0.01%	0.34%	0.15%	2.10%	21.74%	0.00%	0.74%	39.13%	16.76%	0.42%
DT51	4.90%	3.60%	0.44%	0.00%	3.65%	1.54%	1.87%	0.05%	0.22%	0.13%	2.18%	16.50%	0.00%	0.76%	43.77%	19.89%	0.49%
DT19	7.40%	5.37%	0.67%	0.01%	0.87%	1.49%	0.45%	0.01%	0.33%	0.15%	2.16%	22.37%	0.00%	0.77%	40.27%	17.25%	0.43%
DT11	6.09%	4.42%	0.55%	0.00%	0.53%	1.30%	0.28%	0.01%	0.27%	0.17%	2.55%	25.78%	0.00%	0.87%	40.25%	16.54%	0.40%
DT07	9.27%	6.73%	0.84%	0.01%	2.11%	4.06%	1.11%	0.03%	0.41%	0.11%	2.00%	11.69%	0.00%	1.04%	42.33%	17.80%	0.47%
DT08	9.39%	6.81%	0.85%	0.01%	1.20%	1.67%	0.63%	0.02%	0.42%	0.20%	2.29%	20.13%	0.00%	0.83%	38.92%	16.24%	0.39%
DT37	10.11%	7.34%	0.92%	0.01%	1.30%	2.33%	0.68%	0.02%	0.45%	0.16%	2.10%	11.98%	0.00%	1.68%	42.60%	17.88%	0.45%
DT15	4.88%	3.54%	0.44%	0.00%	2.36%	1.63%	1.24%	0.03%	0.22%	0.14%	2.61%	19.63%	0.00%	0.67%	44.50%	17.67%	0.44%
DT16	5.34%	3.87%	0.48%	0.00%	0.97%	1.51%	0.51%	0.01%	0.24%	0.14%	2.65%	19.95%	0.00%	0.68%	45.23%	17.96%	0.45%
DT01	4.22%	3.06%	0.38%	0.00%	0.77%	1.19%	0.40%	0.01%	0.19%	0.15%	2.73%	20.57%	0.00%	0.70%	46.64%	18.52%	0.47%
DT25	6.72%	4.91%	0.62%	0.01%	1.73%	3.36%	0.91%	0.03%	0.30%	0.15%	2.35%	17.98%	0.00%	1.18%	41.81%	17.49%	0.47%
DT26	7.46%	5.45%	0.68%	0.01%	2.01%	3.81%	1.05%	0.03%	0.33%	0.10%	2.34%	13.97%	0.00%	0.87%	43.79%	17.62%	0.49%

Site ID	Petrol Cars	Diesel Cars	Hybrid Petrol Cars	Hybrid Diesel Cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Taxis	Minor Rd + Cold Start	Industry	Domestic	Aircraft	Rail	Other	Point Sources	Rural
DT27	9.90%	7.23%	0.91%	0.01%	1.63%	2.87%	0.86%	0.02%	0.44%	0.14%	2.20%	16.81%	0.00%	1.10%	39.09%	16.35%	0.44%

Scenario modelling of AQAP measures

Overview

As briefly detailed in 1.7.2, three measures set in out in Medway's AQAP were selected for the air quality modelling study due to their anticipated positive impact in improving air quality. Three modelling scenarios were developed to represent the relevant AQAP measures as accurately as possible in order to estimate the impact of the measures on emissions and concentrations of air pollutants in Medway. The actions and associated modelling scenarios are outlined in Table A- 5.

For each scenario, pollutant emissions and concentrations have been calculated and compared to the baseline scenario to understand the potential impact of the measure on local air quality in Medway, and whether the required reductions outlined in Section 1.7 are able to be achieved. The results of this modelling are provided in the sections below.

Table A- 5 – Summary of AQAP measures modelled and associated modelling scenarios

Model Scenario ID	AQAP Measure	Modelling scenario description	Measure ID and Description
Bus	Explore opportunities to support electrification of the bus fleet in Medway, focusing on routes through the AQMAs (Measure 17)	To represent the increase in uptake of EV buses, the bus fleet travelling on all road links in the model are amended based on three different scenarios of increasing uptake (low, medium, and high).	**Bus_Low** Upgrade all Euro 2 & 3 buses to electric vehicles (approximately 19% of Medway bus fleet). **Bus_Med** Upgrade all Euro 2, 3 & 4 buses to electric vehicles (approximately 31% of Medway bus fleet). **Bus_High** Upgrade all Euro 2, 3, 4 & 5 buses to electric vehicles (approximately 54% of Medway bus fleet).
Freight	Explore opportunities to set up an ECOStars (or similar) Freight Recognition Scheme for Medway (Measure 8)	To represent the uptake of ECOStars in Medway, the exhaust emissions from HGVs (and LGVs where appropriate) have been reduced as a proxy for increasing fuel efficiency by the same proportion. The brake and tyre wear emissions remain unchanged. Three different scenarios representing different levels of increase in the fuel efficiency of freight vehicles in Medway have been defined (low, medium, and high).	**Freight_Low** 5% increase in HGV fuel efficiency.[42] **Freight_Med** 10% increase in HGV fuel efficiency.[42] **Freight_High** 10% increase in HGV fuel efficiency & 5% increase in LGV fuel efficiency.[42]
EV	Deliver the EV Strategy 2022-27 (Measure 14)	To represent the delivery of Medway's EV Strategy, the proportion of EV cars in the Medway fleet have been increased from the baseline scenario (average of 1.89% of all cars) according to three scenarios of increasingly ambitious uptake of EV cars (low, medium, and high). As the proportion of EV cars increases, the proportions of other fuel types for cars (petrol, hybrid, diesel etc) are normalised.	**EV_Low** Increase proportion of electric vehicles in the car fleet to 8.33%.[43] **EV_Med** Increase proportion of electric vehicles in the car fleet to 17.81%. **EV_High** Increase proportion of electric vehicles in the car fleet to 26.56%.

[42] These proportions were derived from selected ECOStars case studies for Hargreaves Logistics, Bidvest, JG Pears and Greggs. Available here: Exostars case studies

[43] The proportions of electric vehicles in the car fleet are determined by the NAEI. Low = 2025 projections, Medium = 2030 projections, High = 2035 projections. Available here: UK National Atmospheric Emissions Inventory

Scenario modelling methodology

To allow for compatibility with the baseline model, the model setup is consistent with that established in the preceding sections of this report. A single road NOx (global) adjustment factor of 3.98 was derived from the model verification and was applied to the calculation of modelled concentrations at specified air quality monitoring locations. In the absence of sufficient PM data for verification, the road NOx adjustment was applied to the modelled road PM_{10} and $PM_{2.5}$ outputs.

The scenario modelling was run for the same year as the baseline model (2022) to capture the direct emissions reductions by implementing the selected measures.

Freight Recognition Scheme modelling scenario assumptions

The assessment of this measure relies on the assumption that greater collaboration with local businesses, with the aim of encouraging low emission vehicle practices and improvements to the HGV fleet travelling in and around Medway, will reduce emissions from HGVs. Case studies from the ECO Stars® scheme have been used to generate modelled scenarios representing a low, medium, and high uptake of the scheme.

ECO Stars® is a free-to-join scheme targeting buses, coaches, vans, taxis, and HGVs. The scheme provides guidance for making improvements to operational practices and recognition for best practice.[44] The scheme focuses not on replacing and upgrading vehicles in a fleet, but on six key pillars to increase fleet operational efficiency: fleet composition; fuel management; driver skills development; vehicle specification and preventative maintenance; IT support systems; and performance monitoring and management.

ECO Stars® case studies for HGV fleets were investigated to see the sort of improvements in emissions the scheme might have: Hargreaves Logistics showed a fuel efficiency increase greater than 4.5%;[45] the Bidvest 3663 Nottingham Depot

[44] Ecostars

[45] Ecostars case study Hargreaves Logistics

gained 5% fuel efficiency;[46] JG Pears increased their average miles per gallon (MPG) by 10%;[47] and Greggs plc increased their MPG by 11%.[48]

The following assumptions were made across the Freight scenarios in Table A- 5:

- All scenarios were modelled for the year 2022.
- Default Euro standards for 2022 (in the EfT v.12.0.1) were used for all vehicle types modelled.
- The exhaust emissions from HGVs (and LGVs where appropriate) were reduced as a proxy for increasing fuel efficiency by the same proportion. The proportions were as follows:
    - Low – 5% increase in HGVs fuel efficiency
    - Medium – 10% increase in HGVs fuel efficiency
    - High – 10% increase in HGVs fuel efficiency and 5% increase in LGVs fuel efficiency
- The brake and tyre wear emissions remained unchanged.

Electric Vehicle Strategy assumptions

This measure aims to Deliver the EV Strategy 2022 – 27, with the council reviewing strategically located council owned sites for potential installation of rapid charging points for public use, including town centres, residential locations, and other destinations. The assessment of this measure relies on the assumption that the improvement of electric vehicle infrastructure in Medway, including additional charging facilities and preferential parking policies, will result in a change in the fleet composition across the town.

The following assumptions were made across the Electric Vehicle Strategy scenarios in Table A- 5:

- All scenarios were modelled for the year 2022.

[46] Ecostars case study Bidvest

[47] Ecostars case study JG Pears

[48] Ecostars case study Greggs

- The number of vehicles on each road link (Annual Average Daily Traffic, AADT) remained the same as provided by the transport model used in the 2022 baseline model.
- The total proportion of each vehicle type (i.e. cars, buses, LGVs, HGVs) remained the same as the 2022 baseline scenario for each road link.
- Only the relative percentages of petrol / diesel / hybrid / EV cars were altered under each scenario. The proportions of EV cars were as follows:
    - Low – 8.33% EV cars in the fleet (equivalent to the value for 2025 from the NAEI)
    - Medium – 17.81% EV cars in the fleet (equivalent to the value for 2030 from the NAEI)
    - High – 26.56% EV cars in the fleet (equivalent to the value for 2035 from the NAEI)

Emissions reductions were calculated using the EfT (v.12.0.1). The reduction in NO_2 concentrations were calculated using the calculated NOx emissions across the modelling domain and application of this to the main air quality model.

Electric Buses assumptions

This measure aims to explore opportunities to support electrification of the bus fleet in Medway, focusing on routes through the AQMAs. The assessment relies on the assumption that external funding sources and/or operator investment will replace the traditional buses in the Medway bus fleet.

The following assumptions were made across the Electric Buses scenarios in Table A- 5:

- All scenarios were modelled for the year 2022.
- The number of buses on each road link (Annual Average Daily Traffic, AADT) remained the same as the 2022 baseline scenario.
- The total proportion of each vehicle type (i.e. cars, buses, LGVs, HGVs) remained the same as the 2022 baseline scenario for each road link.
- Only the relative percentages of electric buses and the EURO standards for conventional buses were altered under each scenario. The proportions of buses upgraded were as follows:
    - Low – all EURO 2 and 3 buses upgraded to EV (equivalent to approximately 19% of Medway's bus fleet)

- Medium – all EURO 2, 3 and 4 buses upgraded to EV (equivalent to approximately 19% of Medway's bus fleet)
- High – all EURO 2, 3, 4 and 5 buses upgraded to EV (equivalent to approximately 19% of Medway's bus fleet)

Scenario modelling results – changes in emissions

The results of the scenario modelling in terms of annual average emissions of NOx, PM_{10}, $PM_{2.5}$ and CO_2 from road transport are presented in Table A- 6, Table A- 7, and Table A- 8, which correspond to the three AQAP measures, respectively. The results have been presented in terms of total modelled annual emissions from road transport across the Medway modelling domain, in tonnes per annum.

In each table, the modelled annual emissions from road transport for the year 2022 are shown for the baseline, and the low, medium, and high uptake scenarios for the respective model scenario (i.e. Bus, Freight, EV) representing the individual AQAP measure.

The results show that all three of the AQAP measures modelled are expected to lead to a reduction in annual emissions of all pollutants, with the greatest changes observed for the "high" uptake scenarios:

- The greatest percentage change in emissions, for all measures and scenarios modelled, is observed for NOx, followed (often closely) by CO_2. Expected emissions reductions from PM_{10} and $PM_{2.5}$ are smaller, both in absolute values and percentage change.
- The greatest emissions savings are observed for the EV scenario, representing delivery of Medway's EV Strategy. The most ambitious uptake scenario could be expected to reduce NOx emissions from road transport by almost 15%, as well as reducing CO_2 emissions by around 13%, and PM_{10} and $PM_{2.5}$ emissions by approximately 7% and 6%, respectively. The "medium" uptake scenario could still reduce NOx emissions by almost 10%, and the "low" scenario could be expected to reduce NOx by around 4%.
- The Bus scenario is also expected to deliver significant improvements in NOx emissions from road transport, around 6% for the "Low" scenario, almost 9%

for the “Medium” scenario and approximately 13% for the “High” scenario. Predicted changes in emissions of PM_{10}, $PM_{2.5}$ and CO_2 are much smaller, around 1-3% across all scenarios.

- The Freight scenario, representing the potential fuel efficiency improvements that could be achieved from a Freight Recognition Scheme (or similar), is expected to deliver small reductions in all pollutants in comparison to the EV and Bus scenarios. However, this is to be expected as the changes in fuel efficiency modelled are quite small (5-10% for HGVs, and up to 5% for LGVs). Considering the uptake scenarios, the “Low” and “Medium” scenarios assume an increase in fuel efficiency in the HGV fleet of 5% and 10%, respectively. The “High” scenario is the only scenario that assumes an increase in fuel efficiency for LGVs as well as HGVs (10% for HGVs, 5% for LGVs), and is estimated to deliver a greater change in emissions (1.55% reduction in NOx, compared to 0.49% for “Medium” and 0.25% for “Low”). Therefore, Medway Council could consider targeting LGVs more intensely with the scheme, potentially leading to greater improvements in emissions.

As the three AQAP measures target different groups of vehicles (buses, freight, and cars), the sum of the predicted reductions in annual emissions can be used as an indicator for the expected changes in concentrations if all three measures were implemented. Overall, implementing the “high” scenario for the three measures could reduce NOx emissions from road transport by almost 30%; CO_2 emissions could be reduced by more than 15% and particulate matter emissions could be reduced by around 8%.

Table A- 6 – Comparison of modelled total annual NOx, PM_{10}, $PM_{2.5}$ and CO_2 emissions from road transport (tonnes/yr), across Medway, for the Bus Modelling Scenario

Pollutant	Baseline	Bus_Low	% Change	Bus_Medium	% Change	Bus_High	% Change
NOx	146.5	137.17	-6.37	133.35	-8.98	127.52	-12.96
$PM_{2.5}$	10.8	10.56	-1.87	10.53	-2.15	10.46	-2.80
PM_{10}	19.7	19.51	-1.02	19.48	-1.18	19.41	-1.53
CO_2	155,791	153,720	-1.33	152,474	-2.13	151,858	-2.52

Table A- 7 – Comparison of modelled total annual NOx, PM_{10}, $PM_{2.5}$ and CO_2 emissions from road transport (tonnes/yr), across Medway, for the EV Modelling Scenario

Pollutant	Baseline	EV_Low	% Change	EV_Medium	% Change	EV_High	% Change
NOx	146.5	140.93	-3.81	132.69	-9.43	125.10	-14.62
$PM_{2.5}$	10.8	10.60	-1.55	10.35	-3.83	10.12	-5.94
PM_{10}	19.7	19.35	-1.81	18.83	-4.47	18.34	-6.93
CO_2	155,791	150,402	-3.46	142,454	-8.56	135,126	-13.26

Table A- 8 – Comparison of modelled annual NOx, PM_{10}, $PM_{2.5}$ and CO_2 emissions from road transport (tonnes/yr), across Medway, for the Freight Modelling Scenario

Pollutant	Baseline	Freight_Low	% Change	Freight_Medium	% Change	Freight_High	% Change
NOx	146.5	146.15	-0.25	145.79	-0.49	144.24	-1.55
$PM_{2.5}$	10.8	10.76	-0.04	10.76	-0.08	10.74	-0.20
PM_{10}	19.7	19.70	-0.02	19.70	-0.04	19.69	-0.11
CO_2	155,791	155,472	-0.20	155,154	-0.41	154,148	-1.05

Scenario modelling results – changes in annual average NO_2 concentrations

The results of the scenario modelling in terms of annual average NO_2 concentrations are presented in Table A- 9, Table A- 10, and Table A- 11, which correspond to the three AQAP measures, respectively. The results have been presented in terms of modelled concentrations at diffusion tubes located within the three AQMAs[49].

In each table, the modelled annual mean NO_2 concentration is shown for all monitoring sites in Medway for the 2022 baseline scenario. The baseline annual mean is shown alongside the results from the low, medium, and high uptake scenarios for the respective model scenario (i.e. Bus, Freight, EV) representing the individual AQAP measure. The change in concentration from the baseline (both in terms of absolute concentration, and percentage change) is highlighted in green, with vibrancy proportional to the magnitude of the change (darker green corresponding to a decrease in concentration of greater magnitude). For each AQAP measure, the diffusion tube with the greatest percentage reduction in NO_2 concentration is underlined and in bold. Furthermore, the two diffusion tubes (DT06 and DT44) that currently exceed the annual mean NO_2 AQO (40 µg/m^3) are highlighted in blue and in bold.

The results show that all three AQAP measures modelled are expected to lead to a reduction in annual mean NO_2 concentrations, with the greatest improvements occurring under the “high” uptake scenario for each of the three measures:

- The “EV_High” scenario is expected to lead to the greatest reduction of annual mean NO_2 of 7.61% (improvement of 2.31 µg/m^3) averaged across all diffusion tubes. The greatest percentage change for an individual diffusion tube occurs at **DT17**, with a reduction of 9.18% (improvement of 3.23 µg/m^3). **DT17** is near the junction between the A2 and Canterbury Street, which experiences a high volume of traffic, and so would be expected to experience a significant

[49] Only diffusion tube locations that were used in the model verification have been presented.

improvement in NO_2 concentrations as the proportion of EV cars in the Medway fleet increases.

- The “Bus_High” scenario is expected to lead to an average reduction of annual mean NO_2 of 6.07% (improvement of 1.81 µg/m^3) across all diffusion tubes. The greatest percentage change for an individual diffusion tube occurs at **DT07**, with a reduction of 11.19% (improvement of 3.96 µg/m^3).

- The “Freight_High” scenario is expected to lead to an average reduction of annual mean NO_2 of 0.72% (improvement of 0.22 µg/m^3) across all diffusion tubes. As with the Bus scenario, the greatest percentage change for an individual diffusion tube under the Freight scenarios occurs at **DT07**, with a reduction of 1.19% (improvement of 0.42 µg/m^3).

As the three AQAP measures target different groups of vehicles (buses, freight, and cars), the sum of the predicted reductions in annual average concentrations can be used as an indicator for the expected changes in concentrations if all three measures were implemented. Overall, implementing the “high” scenario for the three measures is likely to bring diffusion tube **DT06** closer to compliance with the NO_2 AQO, with a cumulative reduction of 3.36 µg/m^3 (compared to a required reduction of 3.5 µg/m^3 to achieve compliance). The cumulative reduction of NO_2 from the implementation of the three “high” scenario measures could be expected to bring **DT44** into compliance with the NO_2, with a cumulative reduction of 4.38 µg/m^3 (compared to a required reduction of 3.5 µg/m^3 to achieve compliance).

Table A- 9 – Comparison of modelled NO_2 concentrations across Medway for the Bus Modelling Scenario

Site ID	Annual mean NO_2 in 2022 ($\mu g/m^3$) Baseline	Annual mean NO_2 in 2022 ($\mu g/m^3$) Bus_Low	Annual mean NO_2 in 2022 ($\mu g/m^3$) Bus_Med	Annual mean NO_2 in 2022 ($\mu g/m^3$) Bus_High	Change from baseline ($\mu g/m^3$) Bus_Low	Change from baseline ($\mu g/m^3$) Bus_Med	Change from baseline ($\mu g/m^3$) Bus_High	Change from baseline (%) Bus_Low	Change from baseline (%) Bus_Med	Change from baseline (%) Bus_High
DT02	27.79	26.93	26.58	26.05	-0.86	-1.21	-1.74	-3.09	-4.35	-6.26
DT03	32.92	32.13	31.80	31.30	-0.79	-1.12	-1.62	-2.40	-3.40	-4.92
DT04	27.86	27.10	26.79	26.31	-0.76	-1.07	-1.55	-2.73	-3.84	-5.56
DT05	23.42	22.92	22.72	22.40	-0.50	-0.70	-1.02	-2.13	-2.99	-4.36
DT06	26.03	25.43	25.19	24.82	-0.60	-0.84	-1.21	-2.31	-3.23	-4.65
DT07	**35.40**	**33.47**	**32.67**	**31.44**	**-1.93**	**-2.73**	**-3.96**	**-5.45**	**-7.71**	**-11.19**
DT08	33.92	32.95	32.55	31.94	-0.97	-1.37	-1.98	-2.86	-4.04	-5.84
DT09	23.84	23.56	23.44	23.27	-0.28	-0.40	-0.57	-1.17	-1.68	-2.39
DT10	26.72	26.12	25.87	25.50	-0.60	-0.85	-1.22	-2.25	-3.18	-4.57
DT12	24.31	23.65	23.38	22.96	-0.66	-0.93	-1.35	-2.71	-3.83	-5.55
DT17	35.18	34.49	34.21	33.78	-0.69	-0.97	-1.40	-1.96	-2.76	-3.98
DT18	30.75	29.92	29.58	29.05	-0.83	-1.17	-1.70	-2.70	-3.80	-5.53
DT28	35.60	34.55	34.12	33.47	-1.05	-1.48	-2.13	-2.95	-4.16	-5.98
DT29	30.80	30.06	29.75	29.29	-0.74	-1.05	-1.51	-2.40	-3.41	-4.90
DT30	34.78	33.79	33.39	32.77	-0.99	-1.39	-2.01	-2.85	-4.00	-5.78
DT34	33.66	32.88	32.56	32.08	-0.78	-1.10	-1.58	-2.32	-3.27	-4.69
DT35	33.53	32.37	31.90	31.16	-1.16	-1.63	-2.37	-3.46	-4.86	-7.07
DT37	35.15	34.18	33.78	33.17	-0.97	-1.37	-1.98	-2.76	-3.90	-5.63
DT44	30.47	29.67	29.34	28.84	-0.80	-1.13	-1.63	-2.63	-3.71	-5.35
DT51	27.62	26.71	26.32	25.75	-0.91	-1.30	-1.87	-3.29	-4.71	-6.77
DT19	27.74	26.84	26.46	25.90	-0.90	-1.28	-1.84	-3.24	-4.61	-6.63
DT11	26.53	25.97	25.73	25.38	-0.56	-0.80	-1.15	-2.11	-3.02	-4.33
DT15	23.48	22.54	22.15	21.56	-0.94	-1.33	-1.92	-4.00	-5.66	-8.18

DT16	21.04	20.20	19.86	19.34	-0.84	-1.18	-1.70	-3.99	-5.61	-8.08
DT01	25.04	23.97	23.53	22.86	-1.07	-1.51	-2.18	-4.27	-6.03	-8.71
DT25	32.70	31.59	31.12	30.44	-1.11	-1.58	-2.26	-3.39	-4.83	-6.91
DT26	33.79	32.57	32.05	31.30	-1.22	-1.74	-2.49	-3.61	-5.15	-7.37
DT27	38.01	36.65	36.07	35.24	-1.36	-1.94	-2.77	-3.58	-5.10	-7.29

Table A- 10 – Comparison of modelled NO_2 concentrations across Medway for the EV Modelling Scenario

Site ID	Annual mean NO_2 in 2022 ($\mu g/m^3$) Baseline	Annual mean NO_2 in 2022 ($\mu g/m^3$) EV_Low	Annual mean NO_2 in 2022 ($\mu g/m^3$) EV_Med	Annual mean NO_2 in 2022 ($\mu g/m^3$) EV_High	Change from baseline ($\mu g/m^3$) EV_Low	Change from baseline ($\mu g/m^3$) EV_Med	Change from baseline ($\mu g/m^3$) EV_High	Change from baseline (%) EV_Low	Change from baseline (%) EV_Med	Change from baseline (%) EV_High
DT02	27.79	27.22	26.39	25.61	-0.57	-1.40	-2.18	-2.05	-5.04	-7.84
DT03	32.92	32.18	31.08	30.06	-0.74	-1.84	-2.86	-2.25	-5.59	-8.69
DT04	27.86	27.31	26.50	25.74	-0.55	-1.36	-2.12	-1.97	-4.88	-7.61
DT05	23.42	23.03	22.46	21.93	-0.39	-0.96	-1.49	-1.67	-4.10	-6.36
DT06	26.03	25.52	24.76	24.06	-0.51	-1.27	-1.97	-1.96	-4.88	-7.57
DT07	35.40	34.77	33.84	32.97	-0.63	-1.56	-2.43	-1.78	-4.41	-6.86
DT08	33.92	33.17	32.06	31.03	-0.75	-1.86	-2.89	-2.21	-5.48	-8.52
DT09	23.84	23.41	22.79	22.21	-0.43	-1.05	-1.63	-1.80	-4.40	-6.84
DT10	26.72	26.24	25.53	24.86	-0.48	-1.19	-1.86	-1.80	-4.45	-6.96
DT12	24.31	23.88	23.25	22.67	-0.43	-1.06	-1.64	-1.77	-4.36	-6.75
DT17	**35.18**	**34.34**	**33.10**	**31.95**	**-0.84**	**-2.08**	**-3.23**	**-2.39**	**-5.91**	**-9.18**
DT18	30.75	30.08	29.09	28.18	-0.67	-1.66	-2.57	-2.18	-5.40	-8.36
DT28	35.60	34.81	33.62	32.52	-0.79	-1.98	-3.08	-2.22	-5.56	-8.65
DT29	30.80	30.08	29.02	28.02	-0.72	-1.78	-2.78	-2.34	-5.78	-9.03
DT30	34.78	33.99	32.82	31.72	-0.79	-1.96	-3.06	-2.27	-5.64	-8.80

DT34	33.66	32.91	31.79	30.74	-0.75	-1.87	-2.92	-2.23	-5.56	-8.67
DT35	33.53	32.79	31.69	30.67	-0.74	-1.84	-2.86	-2.21	-5.49	-8.53
DT37	35.15	34.42	33.32	32.29	-0.73	-1.83	-2.86	-2.08	-5.21	-8.14
DT44	30.47	29.83	28.88	27.99	-0.64	-1.59	-2.48	-2.10	-5.22	-8.14
DT51	27.62	27.11	26.36	25.67	-0.51	-1.26	-1.95	-1.85	-4.56	-7.06
DT19	27.74	27.17	26.33	25.55	-0.57	-1.41	-2.19	-2.05	-5.08	-7.89
DT11	26.53	26.03	25.29	24.60	-0.50	-1.24	-1.93	-1.88	-4.67	-7.27
DT15	23.48	23.09	22.52	21.99	-0.39	-0.96	-1.49	-1.66	-4.09	-6.35
DT16	21.04	20.74	20.30	19.90	-0.30	-0.74	-1.14	-1.43	-3.52	-5.42
DT01	25.04	24.61	23.97	23.37	-0.43	-1.07	-1.67	-1.72	-4.27	-6.67
DT25	32.70	32.14	31.30	30.52	-0.56	-1.40	-2.18	-1.71	-4.28	-6.67
DT26	33.79	33.20	32.33	31.52	-0.59	-1.46	-2.27	-1.75	-4.32	-6.72
DT27	38.01	37.26	36.14	35.09	-0.75	-1.87	-2.92	-1.97	-4.92	-7.68

Table A- 11 – Comparison of modelled NO_2 concentrations across Medway for the Freight Modelling Scenario

Site ID	Annual mean NO_2 in 2022 ($\mu g/m^3$) Baseline	Annual mean NO_2 in 2022 ($\mu g/m^3$) Freight_Low	Annual mean NO_2 in 2022 ($\mu g/m^3$) Freight_Med	Annual mean NO_2 in 2022 ($\mu g/m^3$) Freight_High	Change from baseline ($\mu g/m^3$) Freight_Low	Change from baseline ($\mu g/m^3$) Freight_Med	Change from baseline ($\mu g/m^3$) Freight_High	Change from baseline (%) Freight_Low	Change from baseline (%) Freight_Med	Change from baseline (%) Freight_High
DT02	27.79	27.75	27.72	27.57	-0.04	-0.07	-0.22	-0.14	-0.25	-0.79
DT03	32.92	32.89	32.86	32.64	-0.03	-0.06	-0.28	-0.09	-0.18	-0.85
DT04	27.86	27.83	27.80	27.70	-0.03	-0.06	-0.16	-0.11	-0.22	-0.57
DT05	23.42	23.40	23.38	23.30	-0.02	-0.04	-0.12	-0.09	-0.17	-0.51
DT06	26.03	26.00	25.98	25.85	-0.03	-0.05	-0.18	-0.12	-0.19	-0.69
DT07	**35.40**	**35.32**	**35.25**	**34.98**	**-0.08**	**-0.15**	**-0.42**	**-0.23**	**-0.42**	**-1.19**
DT08	33.92	33.88	33.85	33.71	-0.04	-0.07	-0.21	-0.12	-0.21	-0.62

DT09	23.84	23.82	23.81	23.74	-0.02	-0.03	-0.10	-0.08	-0.13	-0.42
DT10	26.72	26.70	26.68	26.59	-0.02	-0.04	-0.13	-0.07	-0.15	-0.49
DT12	24.31	24.28	24.26	24.13	-0.03	-0.05	-0.18	-0.12	-0.21	-0.74
DT17	35.18	35.15	35.12	34.95	-0.03	-0.06	-0.23	-0.09	-0.17	-0.65
DT18	30.75	30.72	30.68	30.56	-0.03	-0.07	-0.19	-0.10	-0.23	-0.62
DT28	35.60	35.56	35.52	35.36	-0.04	-0.08	-0.24	-0.11	-0.22	-0.67
DT29	30.80	30.77	30.74	30.60	-0.03	-0.06	-0.20	-0.10	-0.19	-0.65
DT30	34.78	34.75	34.71	34.55	-0.03	-0.07	-0.23	-0.09	-0.20	-0.66
DT34	33.66	33.63	33.60	33.38	-0.03	-0.06	-0.28	-0.09	-0.18	-0.83
DT35	33.53	33.48	33.44	33.24	-0.05	-0.09	-0.29	-0.15	-0.27	-0.86
DT37	35.15	35.12	35.08	34.93	-0.03	-0.07	-0.22	-0.09	-0.20	-0.63
DT44	30.47	30.44	30.41	30.20	-0.03	-0.06	-0.27	-0.10	-0.20	-0.89
DT51	27.62	27.58	27.55	27.36	-0.04	-0.07	-0.26	-0.14	-0.25	-0.94
DT19	27.74	27.71	27.67	27.53	-0.03	-0.07	-0.21	-0.11	-0.25	-0.76
DT11	26.53	26.51	26.49	26.39	-0.02	-0.04	-0.14	-0.08	-0.15	-0.53
DT15	23.48	23.44	23.40	23.31	-0.04	-0.08	-0.17	-0.17	-0.34	-0.72
DT16	21.04	21.00	20.97	20.90	-0.04	-0.07	-0.14	-0.19	-0.33	-0.67
DT01	25.04	25.00	24.96	24.86	-0.04	-0.08	-0.18	-0.16	-0.32	-0.72
DT25	32.70	32.66	32.62	32.43	-0.04	-0.08	-0.27	-0.12	-0.24	-0.83
DT26	33.79	33.74	33.70	33.49	-0.05	-0.09	-0.30	-0.15	-0.27	-0.89
DT27	38.01	37.96	37.91	37.67	-0.05	-0.10	-0.34	-0.13	-0.26	-0.89

Scenario modelling results – changes in annual average PM_{10} concentrations

The results of the scenario modelling in terms of annual average NO_2 concentrations are presented in Table A- 12, Table A- 13 and Table A- 14, which correspond to the three AQAP measures, respectively. The results have been presented in terms of modelled concentrations at diffusion tubes located within the three AQMAs[50].

In each table, the modelled annual mean PM_{10} concentration is shown for all monitoring sites in Medway for the 2022 baseline scenario. The baseline annual mean is shown alongside the results from the low, medium, and high uptake scenarios for the respective model scenario (i.e. Bus, Freight, EV) representing the individual AQAP measure. The change in concentration from the baseline (both in terms of absolute concentration, and percentage change) is highlighted in green, with vibrancy proportional to the magnitude of the change (darker green corresponding to a decrease in concentration of greater magnitude). For each AQAP measure, the diffusion tube with the greatest percentage reduction in PM_{10} concentration is underlined and in bold.

The results show that all three AQAP measures modelled are expected to lead to a small reduction in annual mean PM_{10} concentrations, with the greatest improvements occurring under the “high” scenario for each of the three measures:

- The “EV_High” scenario is expected to lead to a reduction in annual average PM_{10} of 1.6% (improvement of 0.33 µg/m^3) averaged across all diffusion tubes. The greatest percentage change for an individual diffusion tube occurs at **DT28**, with a reduction of 2.15% (improvement of 0.47 µg/m^3). **DT28** is near the A2, which experiences a high volume of traffic, and so would be expected to experience an improvement in PM_{10} concentrations as the proportion of EV cars in the Medway fleet increases.

[50] Only diffusion tube locations that were used in the model verification have been presented.

- The “Bus_High” scenario is expected to lead to an average percentage reduction of PM_{10} of 0.29% (improvement of 0.06 µg/m^3) across all diffusion tubes. The greatest percentage change for an individual diffusion tube occurs at **DT07**, with a reduction of 0.61% (improvement of 0.13 µg/m^3).

- The “Freight_High” scenario is expected to lead to an average percentage reduction of PM_{10} of 0.02% (improvement of 0.004 µg/m^3) across all diffusion tubes. The greatest percentage change for an individual diffusion tube occurs at **DT07**, with a reduction of 0.038% (improvement of 0.008 µg/m^3).

The improvements in modelled PM_{10} concentrations are smaller than those predicted for annual mean NO_2 concentrations. Firstly, this is to be expected as road traffic emissions make up a greater proportion of total NOx/NO_2 concentrations, than total PM concentrations. In addition, the three AQAP measures that have been modelled all contribute to reducing exhaust emissions, but will not have an impact on brake and tyre wear emissions (as vehicles are not being removed from the roads, but rather upgraded). Brake and tyre wear emissions can be a significant proportion of total PM emissions from road transport, so reducing exhaust emissions of PM has less of an effect on total PM than removing vehicles from the roads entirely.

Overall, whilst Medway has no predicted exceedances of the annual mean AQO for PM_{10}, the implementation of the three AQAP measures is expected to reduce PM_{10} concentrations by a small amount, and improve air quality across Medway.

Table A- 12 – Comparison of modelled PM_{10} concentrations across Medway for the Bus Modelling Scenario

Site ID	Annual mean PM_{10} in 2022 ($\mu g/m^3$) Baseline	Annual mean PM_{10} in 2022 ($\mu g/m^3$) Bus_Low	Annual mean PM_{10} in 2022 ($\mu g/m^3$) Bus_Med	Annual mean PM_{10} in 2022 ($\mu g/m^3$) Bus_High	Change from baseline ($\mu g/m^3$) Bus_Low	Change from baseline ($\mu g/m^3$) Bus_Med	Change from baseline ($\mu g/m^3$) Bus_High	Change from baseline (%) Bus_Low	Change from baseline (%) Bus_Med	Change from baseline (%) Bus_High
DT02	20.55	20.51	20.51	20.49	-0.04	-0.04	-0.06	-0.18	-0.21	-0.27
DT03	22.45	22.41	22.41	22.40	-0.04	-0.04	-0.05	-0.16	-0.19	-0.24
DT04	20.44	20.41	20.40	20.39	-0.03	-0.04	-0.05	-0.16	-0.18	-0.24
DT05	19.92	19.90	19.90	19.89	-0.02	-0.02	-0.03	-0.10	-0.12	-0.15
DT06	18.81	18.78	18.78	18.77	-0.03	-0.03	-0.04	-0.14	-0.16	-0.20
DT07	**22.00**	**21.91**	**21.90**	**21.87**	**-0.09**	**-0.10**	**-0.13**	**-0.41**	**-0.47**	**-0.61**
DT08	21.25	21.20	21.20	21.18	-0.04	-0.05	-0.07	-0.21	-0.24	-0.31
DT09	20.38	20.37	20.37	20.37	-0.01	-0.01	-0.02	-0.06	-0.07	-0.08
DT10	19.10	19.08	19.07	19.07	-0.03	-0.03	-0.04	-0.13	-0.16	-0.20
DT12	19.53	19.50	19.50	19.49	-0.03	-0.03	-0.04	-0.14	-0.17	-0.22
DT17	24.04	24.01	24.00	23.99	-0.03	-0.04	-0.05	-0.13	-0.15	-0.20
DT18	21.21	21.18	21.17	21.16	-0.04	-0.04	-0.05	-0.17	-0.20	-0.25
DT28	21.95	21.90	21.90	21.88	-0.05	-0.06	-0.07	-0.22	-0.26	-0.33
DT29	20.73	20.70	20.69	20.68	-0.03	-0.04	-0.05	-0.16	-0.18	-0.24
DT30	21.61	21.56	21.55	21.54	-0.05	-0.05	-0.07	-0.21	-0.24	-0.32
DT34	21.30	21.27	21.26	21.25	-0.04	-0.04	-0.05	-0.17	-0.19	-0.25
DT35	22.23	22.18	22.17	22.16	-0.05	-0.06	-0.08	-0.24	-0.27	-0.35
DT37	20.83	20.78	20.78	20.76	-0.04	-0.05	-0.07	-0.22	-0.25	-0.32
DT44	21.43	21.39	21.39	21.38	-0.04	-0.04	-0.05	-0.17	-0.19	-0.25
DT51	19.72	19.68	19.68	19.66	-0.04	-0.05	-0.06	-0.22	-0.25	-0.33
DT19	20.44	20.40	20.40	20.38	-0.04	-0.05	-0.06	-0.19	-0.22	-0.29
DT11	19.72	19.70	19.69	19.68	-0.02	-0.03	-0.04	-0.12	-0.14	-0.18
DT15	18.08	18.04	18.04	18.02	-0.04	-0.05	-0.06	-0.22	-0.25	-0.33

DT16	17.37	17.34	17.33	17.32	-0.03	-0.04	-0.05	-0.20	-0.23	-0.30
DT01	18.48	18.43	18.42	18.41	-0.05	-0.05	-0.07	-0.25	-0.29	-0.37
DT25	20.35	20.29	20.29	20.27	-0.05	-0.06	-0.08	-0.26	-0.29	-0.39
DT26	20.63	20.57	20.56	20.54	-0.06	-0.07	-0.09	-0.28	-0.33	-0.43
DT27	22.00	21.93	21.92	21.90	-0.07	-0.08	-0.10	-0.31	-0.35	-0.47

Table A- 13 – Comparison of modelled PM_{10} concentrations across Medway for the EV Modelling Scenario

Site ID	Annual mean PM_{10} in 2022 ($\mu g/m^3$) Baseline	Annual mean PM_{10} in 2022 ($\mu g/m^3$) EV_Low	Annual mean PM_{10} in 2022 ($\mu g/m^3$) EV_Med	Annual mean PM_{10} in 2022 ($\mu g/m^3$) EV_High	Change from baseline ($\mu g/m^3$) EV_Low	Change from baseline ($\mu g/m^3$) EV_Med	Change from baseline ($\mu g/m^3$) EV_High	Change from baseline (%) EV_Low	Change from baseline (%) EV_Med	Change from baseline (%) EV_High
DT02	20.55	20.47	20.35	20.24	-0.08	-0.20	-0.31	-0.40	-0.98	-1.52
DT03	22.45	22.34	22.17	22.02	-0.11	-0.28	-0.43	-0.50	-1.24	-1.93
DT04	20.44	20.36	20.25	20.15	-0.08	-0.19	-0.30	-0.38	-0.93	-1.44
DT05	19.92	19.87	19.80	19.72	-0.05	-0.13	-0.20	-0.26	-0.65	-1.00
DT06	18.81	18.73	18.63	18.53	-0.07	-0.18	-0.28	-0.39	-0.95	-1.48
DT07	22.00	21.90	21.76	21.63	-0.10	-0.24	-0.38	-0.45	-1.10	-1.71
DT08	21.25	21.14	20.97	20.81	-0.11	-0.28	-0.43	-0.53	-1.32	-2.05
DT09	20.38	20.32	20.24	20.16	-0.06	-0.14	-0.22	-0.29	-0.71	-1.10
DT10	19.10	19.04	18.94	18.84	-0.07	-0.17	-0.26	-0.36	-0.88	-1.37
DT12	19.53	19.47	19.38	19.30	-0.06	-0.15	-0.23	-0.30	-0.75	-1.16
DT17	24.04	23.91	23.73	23.55	-0.13	-0.32	-0.49	-0.53	-1.31	-2.03
DT18	21.21	21.12	20.98	20.84	-0.10	-0.24	-0.37	-0.45	-1.12	-1.74
DT28	**21.95**	**21.83**	**21.65**	**21.48**	**-0.12**	**-0.30**	**-0.47**	**-0.56**	**-1.39**	**-2.15**
DT29	20.73	20.63	20.47	20.32	-0.11	-0.26	-0.41	-0.51	-1.27	-1.97
DT30	21.61	21.49	21.31	21.14	-0.12	-0.30	-0.46	-0.56	-1.38	-2.14
DT34	21.30	21.19	21.02	20.86	-0.12	-0.29	-0.44	-0.54	-1.34	-2.08
DT35	22.23	22.12	21.96	21.80	-0.11	-0.28	-0.43	-0.50	-1.24	-1.93

DT37	20.83	20.72	20.55	20.40	-0.11	-0.28	-0.43	-0.54	-1.34	-2.08
DT44	21.43	21.34	21.20	21.07	-0.10	-0.24	-0.36	-0.44	-1.10	-1.70
DT51	19.72	19.66	19.57	19.48	-0.06	-0.16	-0.25	-0.33	-0.81	-1.25
DT19	20.44	20.36	20.24	20.13	-0.08	-0.20	-0.32	-0.40	-1.00	-1.54
DT11	19.72	19.65	19.54	19.45	-0.07	-0.18	-0.27	-0.36	-0.89	-1.38
DT15	18.08	18.03	17.95	17.88	-0.05	-0.13	-0.21	-0.30	-0.74	-1.14
DT16	17.37	17.33	17.27	17.22	-0.04	-0.10	-0.15	-0.23	-0.57	-0.89
DT01	18.48	18.42	18.33	18.25	-0.06	-0.15	-0.23	-0.33	-0.81	-1.26
DT25	20.35	20.27	20.16	20.06	-0.08	-0.19	-0.29	-0.37	-0.92	-1.43
DT26	20.63	20.55	20.43	20.32	-0.08	-0.20	-0.30	-0.38	-0.95	-1.47
DT27	22.00	21.89	21.74	21.59	-0.11	-0.26	-0.40	-0.48	-1.19	-1.84

Table A- 14 – Comparison of modelled PM_{10} concentrations across Medway for the Freight Modelling Scenario

Site ID	Annual mean PM_{10} in 2022 ($\mu g/m^3$) Baseline	Annual mean PM_{10} in 2022 ($\mu g/m^3$) Freight_Low	Annual mean PM_{10} in 2022 ($\mu g/m^3$) Freight_Med	Annual mean PM_{10} in 2022 ($\mu g/m^3$) Freight_High	Change from baseline ($\mu g/m^3$) Freight_Low	Change from baseline ($\mu g/m^3$) Freight_Med	Change from baseline ($\mu g/m^3$) Freight_High	Change from baseline (%) Freight_Low	Change from baseline (%) Freight_Med	Change from baseline (%) Freight_High
DT02	20.549	20.548	20.547	20.545	-0.001	-0.002	-0.004	-0.004	-0.008	-0.019
DT03	22.451	22.450	22.450	22.446	-0.001	-0.002	-0.005	-0.003	-0.007	-0.023
DT04	20.442	20.441	20.441	20.439	-0.001	-0.001	-0.003	-0.003	-0.007	-0.015
DT05	19.925	19.924	19.924	19.922	0.000	-0.001	-0.002	-0.002	-0.004	-0.011
DT06	18.805	18.805	18.804	18.802	-0.001	-0.001	-0.003	-0.003	-0.006	-0.016
DT07	**22.002**	**22.000**	**21.999**	**21.994**	**-0.002**	**-0.004**	**-0.008**	**-0.009**	**-0.017**	**-0.038**
DT08	21.249	21.248	21.247	21.245	-0.001	-0.002	-0.004	-0.004	-0.009	-0.020
DT09	20.383	20.383	20.383	20.382	0.000	0.000	-0.002	-0.001	-0.002	-0.008
DT10	19.104	19.104	19.103	19.102	-0.001	-0.001	-0.003	-0.003	-0.006	-0.013
DT12	19.529	19.528	19.527	19.525	-0.001	-0.001	-0.003	-0.003	-0.006	-0.017

DT17	24.041	24.040	24.040	24.037	-0.001	-0.001	-0.004	-0.003	-0.005	-0.018
DT18	21.213	21.212	21.212	21.209	-0.001	-0.001	-0.004	-0.003	-0.007	-0.017
DT28	21.952	21.951	21.950	21.947	-0.001	-0.002	-0.005	-0.005	-0.009	-0.021
DT29	20.733	20.732	20.731	20.729	-0.001	-0.001	-0.004	-0.003	-0.007	-0.018
DT30	21.607	21.606	21.605	21.603	-0.001	-0.002	-0.005	-0.004	-0.009	-0.021
DT34	21.302	21.302	21.301	21.297	-0.001	-0.002	-0.005	-0.004	-0.007	-0.025
DT35	22.233	22.232	22.231	22.227	-0.001	-0.002	-0.006	-0.005	-0.010	-0.025
DT37	20.830	20.829	20.828	20.825	-0.001	-0.002	-0.004	-0.005	-0.009	-0.021
DT44	21.431	21.430	21.429	21.426	-0.001	-0.001	-0.005	-0.004	-0.007	-0.023
DT51	19.725	19.724	19.723	19.720	-0.001	-0.002	-0.005	-0.005	-0.009	-0.026
DT19	20.443	20.442	20.441	20.439	-0.001	-0.002	-0.004	-0.004	-0.008	-0.019
DT11	19.719	19.719	19.718	19.717	-0.001	-0.001	-0.003	-0.003	-0.005	-0.013
DT15	18.084	18.083	18.082	18.081	-0.001	-0.002	-0.003	-0.005	-0.009	-0.017
DT16	17.372	17.371	17.370	17.369	-0.001	-0.001	-0.003	-0.004	-0.008	-0.015
DT01	18.477	18.476	18.475	18.474	-0.001	-0.002	-0.004	-0.005	-0.010	-0.019
DT25	20.347	20.346	20.344	20.341	-0.001	-0.002	-0.005	-0.005	-0.011	-0.026
DT26	20.627	20.626	20.624	20.621	-0.001	-0.003	-0.006	-0.006	-0.013	-0.028
DT27	21.999	21.997	21.996	21.992	-0.002	-0.003	-0.007	-0.007	-0.014	-0.031

Scenario modelling results – changes in annual average $PM_{2.5}$ concentrations

The results of the scenario modelling in terms of annual average $PM_{2.5}$ concentrations are presented in Table A- 15, Table A- 16, and Table A- 17, which correspond to the three AQAP measures, respectively. The results have been presented in terms of modelled concentrations at diffusion tubes located within the three AQMAs[51].

In each table, the modelled annual mean $PM_{2.5}$ concentration is shown for all monitoring sites in Medway for the 2022 baseline scenario. The baseline annual mean is shown alongside the results from the low, medium, and high uptake scenarios for the respective model scenario (i.e. Bus, Freight, EV) representing the individual AQAP measure. The change in concentration from the baseline (both in terms of absolute concentration, and percentage change) is highlighted in green, with vibrancy proportional to the magnitude of the change (darker green corresponding to a decrease in concentration of greater magnitude). For each AQAP measure, the diffusion tube with the greatest percentage reduction in $PM_{2.5}$ concentration is underlined and in bold.

The results show that all three AQAP measures modelled are expected to lead to a small reduction in annual mean $PM_{2.5}$ concentrations, with the greatest improvements occurring under the “high” scenario for each of the three measures:

- The “EV_High” scenario is expected to lead to a percentage reduction of annual average $PM_{2.5}$ of 1.12% (improvement of 0.15 µg/m^3) averaged across all diffusion tubes. The greatest percentage change for an individual diffusion tube occurs at **DT28**, with a reduction of 1.52% (improvement of 0.22 µg/m^3). **DT28** is near the A2, which experiences a high volume of traffic, and so would be expected to experience an improvement in $PM_{2.5}$ concentrations as the proportion of EV cars in the Medway fleet increases.

[51] Only diffusion tube locations that were used in the model verification have been presented.

- The “Bus_High” scenario is expected to lead to an average percentage reduction of PM_{10} of 0.43% (improvement of 0.06 µg/m^3) across all diffusion tubes. The greatest percentage change for an individual diffusion tube occurs at **DT07**, with a reduction of 0.93% (improvement of 0.13 µg/m^3).

- The “Freight_High” scenario is expected to lead to an average percentage reduction of NO_2 of 0.03% (improvement of 0.004 µg/m^3) across all diffusion tubes. The greatest percentage change for an individual diffusion tube occurs at **DT07**, with a reduction of 0.058% (improvement of 0.008 µg/m^3).

The improvements in modelled PM_{10} concentrations are smaller than those predicted for annual mean NO_2 concentrations. Firstly, this is to be expected as road traffic emissions make up a greater proportion of total NOx/NO_2 concentrations, than total PM concentrations. In addition, the three AQAP measures that have been modelled all contribute to reducing exhaust emissions, but will not have an impact on brake and tyre wear emissions (as vehicles are not being removed from the roads, but rather upgraded). Brake and tyre wear emissions can be a significant proportion of total PM emissions from road transport, so reducing exhaust emissions of PM has less of an effect on total PM than removing vehicles from the roads entirely.

Overall, whilst Medway has no predicted exceedances of the annual mean AQO for $PM_{2.5}$, the implementation of the measures will reduce $PM_{2.5}$ concentrations and improve air quality across Medway.

Table A- 15 – Comparison of modelled $PM_{2.5}$ concentrations across Medway for the Bus Modelling Scenario

Site ID	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) Baseline	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) Bus_Low	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) Bus_Med	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) Bus_High	Change from baseline ($\mu g/m^3$) Bus_Low	Change from baseline ($\mu g/m^3$) Bus_Med	Change from baseline ($\mu g/m^3$) Bus_High	Change from baseline (%) Bus_Low	Change from baseline (%) Bus_Med	Change from baseline (%) Bus_High
DT02	13.73	13.69	13.69	13.68	-0.04	-0.04	-0.06	-0.27	-0.31	-0.40
DT03	14.92	14.89	14.88	14.87	-0.04	-0.04	-0.05	-0.24	-0.28	-0.37
DT04	13.86	13.83	13.82	13.81	-0.03	-0.04	-0.05	-0.24	-0.27	-0.35
DT05	13.87	13.85	13.85	13.84	-0.02	-0.02	-0.03	-0.15	-0.17	-0.22
DT06	12.37	12.34	12.34	12.33	-0.03	-0.03	-0.04	-0.21	-0.24	-0.31
DT07	**14.49**	**14.40**	**14.39**	**14.36**	**-0.09**	**-0.10**	**-0.13**	**-0.62**	**-0.72**	**-0.93**
DT08	13.87	13.83	13.82	13.80	-0.04	-0.05	-0.07	-0.32	-0.37	-0.48
DT09	14.23	14.22	14.22	14.21	-0.01	-0.01	-0.02	-0.08	-0.09	-0.12
DT10	12.78	12.75	12.75	12.74	-0.03	-0.03	-0.04	-0.20	-0.23	-0.30
DT12	13.11	13.08	13.08	13.07	-0.03	-0.03	-0.04	-0.21	-0.25	-0.32
DT17	16.29	16.26	16.25	16.24	-0.03	-0.04	-0.05	-0.19	-0.22	-0.29
DT18	14.22	14.18	14.18	14.17	-0.04	-0.04	-0.05	-0.26	-0.30	-0.38
DT28	14.32	14.27	14.26	14.25	-0.05	-0.06	-0.07	-0.34	-0.39	-0.51
DT29	13.51	13.48	13.48	13.47	-0.03	-0.04	-0.05	-0.25	-0.28	-0.37
DT30	14.04	14.00	13.99	13.97	-0.05	-0.05	-0.07	-0.33	-0.38	-0.48
DT34	13.79	13.76	13.75	13.74	-0.04	-0.04	-0.05	-0.26	-0.30	-0.39
DT35	14.72	14.67	14.66	14.64	-0.05	-0.06	-0.08	-0.36	-0.41	-0.53
DT37	13.47	13.42	13.42	13.40	-0.04	-0.05	-0.07	-0.33	-0.38	-0.50
DT44	14.25	14.21	14.21	14.20	-0.04	-0.04	-0.05	-0.25	-0.29	-0.38
DT51	12.87	12.83	12.82	12.81	-0.04	-0.05	-0.06	-0.33	-0.38	-0.50
DT19	13.61	13.58	13.57	13.56	-0.04	-0.05	-0.06	-0.29	-0.33	-0.43
DT11	13.33	13.31	13.30	13.29	-0.02	-0.03	-0.04	-0.18	-0.21	-0.27
DT15	12.28	12.24	12.23	12.22	-0.04	-0.05	-0.06	-0.32	-0.37	-0.48

DT16	11.89	11.86	11.85	11.84	-0.03	-0.04	-0.05	-0.29	-0.33	-0.43
DT01	12.49	12.45	12.44	12.43	-0.05	-0.05	-0.07	-0.37	-0.42	-0.55
DT25	13.46	13.41	13.40	13.38	-0.05	-0.06	-0.08	-0.39	-0.45	-0.59
DT26	13.62	13.56	13.55	13.53	-0.06	-0.07	-0.09	-0.43	-0.49	-0.66
DT27	14.34	14.27	14.26	14.24	-0.07	-0.08	-0.10	-0.47	-0.54	-0.72

Table A- 16 – Comparison of modelled $PM_{2.5}$ concentrations across Medway for the EV Modelling Scenario

Site ID	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) Baseline	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) EV_Low	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) EV_Med	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) EV_High	Change from baseline ($\mu g/m^3$) EV_Low	Change from baseline ($\mu g/m^3$) EV_Med	Change from baseline ($\mu g/m^3$) EV_High	Change from baseline (%) EV_Low	Change from baseline (%) EV_Med	Change from baseline (%) EV_High
DT02	13.73	13.69	13.64	13.64	-0.04	-0.09	-0.14	-0.27	-0.68	-1.05
DT03	14.92	14.87	14.79	14.79	-0.05	-0.13	-0.20	-0.35	-0.86	-1.34
DT04	13.86	13.83	13.77	13.77	-0.04	-0.09	-0.14	-0.26	-0.64	-0.99
DT05	13.87	13.85	13.81	13.81	-0.02	-0.06	-0.09	-0.17	-0.43	-0.67
DT06	12.37	12.33	12.29	12.29	-0.03	-0.08	-0.13	-0.27	-0.67	-1.04
DT07	14.49	14.45	14.38	14.38	-0.05	-0.11	-0.17	-0.31	-0.77	-1.20
DT08	13.87	13.82	13.74	13.74	-0.05	-0.13	-0.20	-0.38	-0.93	-1.45
DT09	14.23	14.20	14.16	14.16	-0.03	-0.07	-0.10	-0.19	-0.47	-0.72
DT10	12.78	12.75	12.70	12.70	-0.03	-0.08	-0.12	-0.25	-0.61	-0.94
DT12	13.11	13.08	13.04	13.04	-0.03	-0.07	-0.10	-0.21	-0.51	-0.80
DT17	16.29	16.23	16.14	16.14	-0.06	-0.15	-0.23	-0.36	-0.89	-1.38
DT18	14.22	14.18	14.11	14.11	-0.04	-0.11	-0.17	-0.31	-0.77	-1.20
DT28	**14.32**	**14.26**	**14.18**	**14.18**	**-0.06**	**-0.14**	**-0.22**	**-0.40**	**-0.98**	**-1.52**
DT29	13.51	13.47	13.39	13.39	-0.05	-0.12	-0.19	-0.36	-0.90	-1.39
DT30	14.04	13.99	13.91	13.91	-0.06	-0.14	-0.21	-0.40	-0.98	-1.52

DT34	13.79	13.74	13.66	13.66	-0.05	-0.13	-0.20	-0.39	-0.96	-1.48
DT35	14.72	14.67	14.59	14.59	-0.05	-0.13	-0.20	-0.35	-0.87	-1.34
DT37	13.47	13.42	13.34	13.34	-0.05	-0.13	-0.20	-0.39	-0.96	-1.48
DT44	14.25	14.21	14.14	14.14	-0.04	-0.11	-0.17	-0.31	-0.76	-1.18
DT51	12.87	12.84	12.80	12.80	-0.03	-0.07	-0.12	-0.24	-0.58	-0.90
DT19	13.61	13.58	13.52	13.52	-0.04	-0.09	-0.15	-0.28	-0.69	-1.07
DT11	13.33	13.30	13.25	13.25	-0.03	-0.08	-0.13	-0.25	-0.61	-0.94
DT15	12.28	12.25	12.22	12.22	-0.02	-0.06	-0.10	-0.20	-0.50	-0.78
DT16	11.89	11.87	11.85	11.85	-0.02	-0.05	-0.07	-0.16	-0.39	-0.60
DT01	12.49	12.47	12.42	12.42	-0.03	-0.07	-0.11	-0.22	-0.55	-0.86
DT25	13.46	13.42	13.37	13.37	-0.04	-0.09	-0.14	-0.26	-0.65	-1.01
DT26	13.62	13.58	13.53	13.53	-0.04	-0.09	-0.14	-0.27	-0.68	-1.05
DT27	14.34	14.29	14.22	14.22	-0.05	-0.12	-0.19	-0.35	-0.86	-1.33

Table A- 17 – Comparison of modelled $PM_{2.5}$ concentrations across Medway for the Freight Modelling Scenario

Site ID	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) Baseline	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) Freight_Low	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) Freight_Med	Annual mean $PM_{2.5}$ in 2022 ($\mu g/m^3$) Freight_High	Change from baseline ($\mu g/m^3$) Freight_Low	Change from baseline ($\mu g/m^3$) Freight_Med	Change from baseline ($\mu g/m^3$) Freight_High	Change from baseline (%) Freight_Low	Change from baseline (%) Freight_Med	Change from baseline (%) Freight_High
DT02	13.732	13.731	13.730	13.728	-0.001	-0.002	-0.004	-0.006	-0.011	-0.029
DT03	14.922	14.921	14.920	14.917	-0.001	-0.002	-0.005	-0.005	-0.010	-0.035
DT04	13.861	13.861	13.860	13.858	-0.001	-0.001	-0.003	-0.005	-0.010	-0.022
DT05	13.870	13.869	13.869	13.868	0.000	-0.001	-0.002	-0.003	-0.006	-0.016
DT06	12.368	12.368	12.367	12.365	-0.001	-0.001	-0.003	-0.004	-0.009	-0.025
DT07	**14.493**	**14.491**	**14.489**	**14.485**	**-0.002**	**-0.004**	**-0.008**	**-0.013**	**-0.026**	**-0.058**
DT08	13.870	13.869	13.868	13.865	-0.001	-0.002	-0.004	-0.007	-0.013	-0.030
DT09	14.230	14.230	14.230	14.229	0.000	0.000	-0.002	-0.002	-0.003	-0.011

DT10	12.777	12.777	12.776	12.775	-0.001	-0.001	-0.003	-0.004	-0.008	-0.020
DT12	13.111	13.110	13.110	13.108	-0.001	-0.001	-0.003	-0.005	-0.009	-0.024
DT17	16.289	16.289	16.288	16.285	-0.001	-0.001	-0.004	-0.004	-0.008	-0.026
DT18	14.221	14.220	14.219	14.217	-0.001	-0.002	-0.004	-0.005	-0.011	-0.025
DT28	14.321	14.320	14.319	14.316	-0.001	-0.002	-0.005	-0.007	-0.014	-0.033
DT29	13.515	13.514	13.513	13.511	-0.001	-0.001	-0.004	-0.005	-0.010	-0.028
DT30	14.043	14.042	14.041	14.038	-0.001	-0.002	-0.005	-0.007	-0.013	-0.032
DT34	13.792	13.792	13.791	13.787	-0.001	-0.002	-0.005	-0.005	-0.011	-0.038
DT35	14.722	14.721	14.720	14.716	-0.001	-0.002	-0.006	-0.007	-0.015	-0.038
DT37	13.468	13.467	13.466	13.463	-0.001	-0.002	-0.004	-0.007	-0.014	-0.032
DT44	14.251	14.250	14.249	14.246	-0.001	-0.002	-0.005	-0.005	-0.011	-0.034
DT51	12.873	12.872	12.871	12.868	-0.001	-0.002	-0.005	-0.007	-0.015	-0.040
DT19	13.615	13.614	13.613	13.611	-0.001	-0.002	-0.004	-0.006	-0.012	-0.029
DT11	13.330	13.330	13.329	13.328	-0.001	-0.001	-0.003	-0.004	-0.008	-0.019
DT15	12.277	12.276	12.275	12.274	-0.001	-0.002	-0.003	-0.006	-0.013	-0.025
DT16	11.893	11.892	11.891	11.890	-0.001	-0.001	-0.003	-0.006	-0.012	-0.021
DT01	12.494	12.493	12.492	12.491	-0.001	-0.002	-0.004	-0.008	-0.015	-0.029
DT25	13.46	13.458	13.457	13.454	-0.001	-0.002	-0.005	-0.009	-0.017	-0.039
DT26	13.62	13.620	13.619	13.616	-0.001	-0.003	-0.006	-0.010	-0.019	-0.043
DT27	14.34	14.340	14.339	14.335	-0.002	-0.003	-0.007	-0.011	-0.021	-0.047

Appendix D: Steering Group Workshop Meeting Minutes

Medway Air Quality Action Plan Steering Group Meeting Minutes

Date: 06/02/2024

Time: 10:00 – 12:00

Participants

Ricardo Team

1. Charlotte Day – Senior Consultant
2. Patrick Harland – Consultant
3. Oliver Marshall – Analyst Consultant

Medway Steering Group

	Name	Organisation/Position
1	Stuart Steed	Environmental Protection Officer
2	Colin Green	Senior Engineer Traffic Manager
3	David Warner	Transport Engineering Manager
4	Ian Gilmore	Head of Regulatory Services
5	James Sutton	Sustainable Transport Manager
6	Janet Davies	Head of HIF and Regeneration Delivery
7	Mandy Francis	Licensing Manager
8	Rob Carmen	Senior Public Transport Planner
9	Stacey McGregor	Green Spaces and Rights of Way and Access Officer
10	Vicki Emrit	Climate Response Officer
11	Darren Taylor	Senior Transport Planner

Agenda and speakers

Introductions	Charlotte	10:00 - 10:10
What is an Air Quality Action Plan?	Charlotte	10:10 – 10:25
Air quality and emissions in Medway	Patrick	10:25 – 10:40
Developing air quality actions	Oliver	10:40 – 10:45
AQAP actions – discussion and Medway inputs	Oliver	10:45 – 11:50
Recommendations for air quality modelling	Patrick	11:50 – 11:55
Next steps	Charlotte	11:55 – 12:00

What is an Air Quality Action Plan? *[Charlotte Day, Ricardo]*

- Air quality has improved in England over recent decades. However, it continues to be the biggest environmental risk to public health, with children, the elderly and the already vulnerable most affected.
- The annual mortality of human-made air pollution in the UK is roughly equivalent to up to 36,000 deaths every year, and the estimated total cost to the NHS and social care system of air pollutants (looking specifically at fine particulate matter ($PM_{2.5}$) and nitrogen dioxide) is £1.6 billion.
- Medway is required to provide an AQAP as part of their duties required by the local air quality management framework. The action plan is a live document which is continually reviewed and developed to ensure that the current measures are progressing, and new measures are being brought forward.
- Developing an action plan can be seen as an opportunity both to develop a set of measures and actions to address specific local air quality issues, but also to get key stakeholders involved in their development and adoption. The most effective Action Plans follow a step-by-step approach, which enables a package of suitable measures to be developed, using both a detailed evidence base with a good level of local collaboration.
- The main criteria listed under Part four of the Environment Act can be used as a checklist when completing the Plan. The requirements include:
    - Quantification of source contributions
    - Evidence that all available options have been considered in terms of cost-effectiveness and feasibility
    - How the council will use its powers and work in conjunction with other organisations in pursuit of the air quality objectives
    - Clear timescales in which the council proposes to implement the measures

  - Quantification of expected impacts of the proposed measures and an indication as to whether the measures will be sufficient to meet the air quality objectives
  - How the council intends to monitor and evaluate the effectiveness of the plan to keep track of progress
- The requirements for the Medway AQAP are that this is an update to the 2015 AQAP, which covered the same three AQMAs in Rainham, Gillingham and Central Medway. This AQAP is being prepared on a tight timescale.

Air quality and emissions in Medway *[Patrick Harland, Ricardo]*

- Medway has four AQMAs, all declared for nitrogen dioxide (NO_2). Nitrogen oxides (NO_x) and NO_2 can have impacts on human health, and is usually recognised for exacerbating asthma and other respiratory diseases. Particulate matter is also a pollutant of concern. PM stands for particulate matter: the term for a mixture of solid particles and liquid droplets found in the air. Some particles less than 10 micrometres in diameter can get deep into your lungs and some may even get into your bloodstream. Of these, particles less than 2.5 micrometres in diameter ($PM_{2.5}$), pose the greatest risk to health.
- Road traffic is the major source of NO_x emissions in the UK. In Medway, the proportions of NO_x emissions from cars, taxis, and light goods vehicles (LGVs) are similar proportions to the national picture. Emissions from buses and heavy goods vehicles (HGVs) are slightly lower.
- Domestic combustion contributed around a quarter of $PM_{2.5}$ emissions in 2021 and industrial combustion of biomass fuels accounted for around 20%. Road traffic was estimated to cause 13% of $PM_{2.5}$ in 2021.
- In December 2022, as part of the new Environment Act, the UK Government confirmed plans for new targets to reduce concentrations of $PM_{2.5}$ below 10 $\mu g/m^3$ and reduce exposure by 35% compared to 2018 levels, by 2040. Local authorities are required to consider options for addressing emissions of $PM_{2.5}$ at a local level as part of the action plan. It is important to note that many of the measures implemented within the action plan designed to target reductions in NO_2, will also have co-benefits for reducing concentrations of PM.
- The main source of NO_2 air pollution in Medway is the road traffic emissions from major roads, and this includes the A289 and the city way, and other major roads in the area. But there are other pollution sources, such as commercial, industrial, and domestic sources, which also contribute to pollutant concentrations.
- Diffusion tube readings over the last five years for NO_2 show that in the Gillingham and Rainham AQMAS, air quality has been improving and remains below the air quality objective for NO_2 (40 $\mu g/m^3$). For Central Medway, some measurements are above the air quality objective or close to it.
- Defra recommends quantifying and demonstrating the impact of a minimum of three measures or package of measures in an AQAP. We have constructed a model to enable us to quantify the impact of up to three measures. The model has a 1-meter resolution. The flows and the speeds of traffic were provided by the existing transport model for Medway, which was scaled to 2022, and the vehicle fleet (broken down into

Euro standards for age and fuel type) was provided by local ANPR measurements. These measurements are most representative of traffic in the Central Medway and Rainham AQMAs.

- Whilst there is a correlation between road activity and $PM_{2.5}$/PM_{10} emissions, there is a larger contribution from background and non-road emissions. Background concentrations of PM in Medway are a significant proportion of total concentrations.
- Source apportionment at diffusion tube locations across Medway shows that:
    - For NO_x, background concentrations are a significant proportion of total concentrations, approximately one third. Rural NO_x is the largest proportion of background NO_x. Diesel cars (around 30%), HGVs and LGVs, and buses also contribute considerably to total NO_x.
    - For $PM_{2.5}$, the background makes up 80% or more of total concentrations. Secondary PM makes up the greatest proportion of background concentrations and is very difficult to have an impact on; residual PM is also a significant proportion of the background. Petrol and diesel cars contribute the most of any vehicle type.
    - For PM_{10}, the situation is almost identical to $PM_{2.5}$.
- The source apportionment can be used to identify which types of measures that could be implemented to target the largest sources of pollution, and see what likely to impact this will have on Medway's emissions. Reducing NO_x emissions is the focus for the AQMAs as they are declared for NO_2, but the source apportionment can also be used to consider measures to reduce PM emissions.
- The types of measures that can be modelled are:
    - Changes in emissions (NO_x, PM, CO_2) and/or concentrations (NO_2, $PM_{2.5}$, PM_{10})
    - Changes to traffic flows (number of vehicles on the road, electrification of passenger vehicles, modal shift i.e. fewer passenger cars on the road)
    - Changes to vehicle speeds (to account for easing congestion/changing speed limits)
    - Changes to vehicle fleets (e.g.; shift to euro VI vehicle fleets, bus electrification, changing council fleets to euro VI)
    - The aim is to have either three separate measures to model or a package of measures can also be modelled.

Discussion: Medway model

Colin Green - Have you taken in consideration displaced traffic from outside sources? There are major works occurring in Sittingbourne, especially around junction 5, which means we we're suffering a lot of displaced traffic from that area, which is over and above normal expectations.

Patrick Harland - In terms of the traffic model, we've used the baseline data for that was 2015 and we've scaled that forward using regular growth to 2022. We used the Trip End Model and program produced by the government. The traffic fleet data and the breakdown of percentages is from ANPR measurements taken in 2022, which have been sense checked. The breakdown of the of the traffic fleet is used to estimate the different types of vehicles travelling through Medway and model their emissions as accurately as possible.

Stuart Steed - The purpose of the modelling is to really help us identify which measures are going to be most effective based on the typical transport mix that we've got. It's not necessarily about representing the picture year on year in terms of traffic flows and any short-term changes that we might get because of major road works and the influence of the National Highway schemes.

Charlotte Day - While we'd love to have the most accurate representation possible of current traffic conditions in Medway and things going forward, especially on the time scale of that project, this just isn't feasible. There are limitations in terms of how accurate we can get the model, but we are to scale this forward to a slightly more relevant year, and also being able to bring in that detail from the ANPR and other work that's been ongoing for the ULEV taxis project to be able to make the fleet that we're modelling the travelling around on those roads more accurate than if we just had the information that was in the traffic model from 2015.

Discussion: Medway model Red Routes

Rob Carmen – Does this take into account the Red Routes we're introducing on some of the key stretch to the A2 in Rainham and other roads?

Stuart Steed– The difficulty we will have taking account of Red Routes will be a lack of model data in itself on how that will change traffic flows. So that work has not been done for the Red Route scheme and the pilot, so we would not be able to take that into account in the modelling and any benefit that that would have in terms of air quality.

Developing air quality actions *[Oliver Marshall, Ricardo]*

- The steps we've taken to arrive at the long list of actions for the Air Quality Action Plan are presented in a flow chart. We considered the air quality monitoring data, as well as emissions information, to determine the magnitude and key sources of pollution in Medway. We also undertook a literature review of a really large range of plans and policies, including those directly related to air quality, but also those outside

of air quality such as the Climate Change Action Plan, local plans, Air Quality Communications strategy, Local Transport Plan, plus much more.

- We then collated the air quality related actions and identified and grouped them into categories reflecting the pollution sources and types of actions and you'll see these categories in the next slide. Following this, we identified where there were gaps and have suggested measures to fill those gaps.
- The 'long list' of AQAP actions are all the actions we think should be considered for inclusion in the AQAP; this steering group meeting is a chance to provide inputs on whether or not they should be included, amendments, and if there's any additional actions that should have been included.
- Steering Group inputs will help us decide which 3 measures we can do detailed modelling for, to estimate the outcome of the proposed measure.
- Part of the reporting template is this table of AQAP actions. The table is really clear on what needs to be filled out, and in what format. We're able to fill a significant portion of this table out based on what we know about Medway, but also need your help and expertise in order to complete it fully:
    - Category and classification of each action – these are set out and defined in the AQAP report template. For the actions we have included in the long list, this covers 8 categories.
    - "Timeline" – which is the year of introduction and completion
    - Organisations involved
    - The funding source, Defra AQ grant funding, funding status, and estimated cost (in a cost banding)
    - Measure status – planning, implementation or completed
    - Target for reduction of emissions – ideally quantitative e.g. emissions reduction
    - KPI – how we will measure that the desired impacts are being achieved
    - Progress to date – a summary of what has been achieved so far
    - Comments / potential barriers – any supporting info, and identify any potential issues to overcome
    - Highlighted in yellow the key things for Medway's input – mainly timeline, funding, and any work done to date.**AQAP actions – discussion and Medway inputs *[Oliver Marshall and Charlotte Day, Ricardo]***

Proposed actions - Promoting Travel Alternatives

- Maintain and promote existing healthy travel schemes – including the Medway Health Walks Scheme and other schemes.
- Work with partners to help develop and enhance National Cycle Routes in Medway – participate in the development of a sub-regional cycle network and enhancement of the National Cycle Routes, along with partners such as Sustrans.
- Identify and implement new cycling and walking opportunities – covers a range of activities including engaging with universities and schools to identify and promote safe walking routes, promoting and facilitating walk and/or cycle to school initiatives, delivery of cycle paths and footpaths within the Housing Infrastructure Fund scheme, where possible, and progressing the development of new walking and cycling facilities via the Active Fund investment.
- Implement improvements recommended in the Local Cycling and Walking Infrastructure Plan (LCWIP)

- Work with businesses and educational establishments to implement travel plans – for example encourage / facilitate home-working by building communal work-hubs with fast internet for workers / rent a desk.
- Review and update the Medway Local Transport Plan – including a focus on the AQMAs.
- Widen Darnley Arch – identified as a significant point of constriction in the Local Transport Plan, but an update on progress is required.

Discussion: Promoting Travel Alternatives

Maintain and promote existing healthy travel schemes

James Sutton - Absolutely continuing, and a cycling scheme too. WOW, school streets, big walk. Just to note that Medway's Safer, Healthier Streets programme includes i. Red Routes, ii. School Streets & iii. Moving Traffic Offences.

- Red Routes
- School Streets
- BSIP

Work with partners to help develop and enhance National Cycle Routes in Medway

James Sutton - We're working to produce local cycling and walking infrastructure plan, which picks up where the Medway Cycling Action Plan left off a few years ago. Got about 80 miles of cycle network on A roads and this is a 10-year plan that we're working on. It will put us in a stronger position when government funding bidding opportunities come up through active travel.

Work with businesses and educational establishments to implement travel plans

James Sutton - We link up with mode shift, so we're signed up to the Mode Shift Stars accreditation scheme for school travel plans. We work closely with colleagues in public health in terms of workplace health and engaging with businesses across Medway, but there's further scope there to consider that more, including the Council Travel Plan.

Review and update the Medway Local Transport Plan

James Sutton - We can certainly add that one in, the head of transport and parking, very much leads on the local transport plan (LTP). The current one runs until next year, so over the course of the year, there will be discussions as we look to update that one.

Widen Darnley Arch

Rob Carmen - Network rail replaced the bridge deck about 10 years ago and this would've been the chance to widen - potential funding for local supermarket but missed the chance.

David Warner - Agree with comments, link to LTP and update this and see if it's a priority.

Proposed actions - Public Information

- Review and update the Air Quality Communications Strategy – includes a review of the current status of air quality communication provision, how many people (and who) this is reaching, and the effectiveness of the information. Themed focuses could include
    - Seasonal pollution episodes

  - Air pollution exposure
  - Domestic emissions and energy efficiency
  - Indoor air pollution
  - Health and financial impacts of air pollution
  - Advice, support, and grants available
  - "Small changes" campaign
- Improve bus service information – this was mentioned in the Local Transport Plan and could include expansion of the real-time information system and/ or text messaging service to all stops across the bus network, and enhanced promotion of bus services through all forms of media.

Discussion: Public Information

Review and update the Air Quality Communications Strategy

Stuart Steed - Probably an action to share between Environmental Protection and Public Health teams - commit to together. Scope of review - long list of sub actions will help the review. Undertake within the next year, got some other work around seasonal episodes being pushed through - forecasting, social media work, signing up to Kent Air alerts.

Vicki Emrit - Link up climate change and air quality and highlight co-benefits.

Stuart Steed - We definitely want to maximise actions and CC / AQ co-benefits - complement the comms strategy.

Improve bus service information

Rob Carmen - Under the BSIP looking to promote buses, not much funding and need to keep existing services on the road, real-time info services were actually removed as the funding has been used to keep / extend the services available.

- Did a free bus weekend before Christmas which increased bus uptake by 50%
- Another free bus weekend in June/July

Charlotte Day - Potential to include this action within the AQ comms strategy instead?

Stuart Steed - Untapped bus market in Medway if bus travel was made more affordable if there was support. The measures don't have to be the screens etc., it can be other things, are there any concrete plans.

Rob Carmen - Focus more on phone apps / keeping the paper info there, also encourage the bus providers to do better communication. Also, BSIP money could only be spent on revenue items, not any additional items like shelters etc.

Proposed actions - Freight and Delivery Management

- HGV route optimisation - review of HGV routes in Medway, with a focus on those through AQMAs, and develop solutions for optimisation
- HGV Sat Nav Review and monitoring - DfT data is available for a number of locations on the Medway road network, and includes locations within/near to AQMAs; this

monitoring data should be used to supplement the research into HGV route optimisation.

- Explore opportunities to support implementation of zero-emissions-only HGVs and LGVs travelling through AQMAs – this could be informed by the source apportionment carried out as part of the development of the 2024 AQAP.

Discussion: Freight and Delivery Management

HGV route optimisation & HGV Sat Nav Review and monitoring

Stuart Steed - Plan is finished, well out of date, not clear that KCC will do additional work. Potentially consider this for Medway itself.

David Warner - Challenge is the AQMAs - route optimisation, these are the main routes through Medway, they are the main routes. David could take this away to see if more could be done.

Explore opportunities to support implementation of zero-emissions-only HGVs and LGVs travelling through AQMAs

Charlotte Day - Also wanted to put forward the ECOStars Freight Recognition Scheme / see if any work has been done previously, if the Council is aware / open to setting this up locally. We can also potentially model improvements to the HGV fleet to demonstrate potential benefits.

Stuart Steed - This action was carefully framed for Four Elms so less relevant here. We previously looked at ECOStars and this could be an alternative to this action.

Vicki Emrit – This is in the current CCAP, but not progressed due to a lack of funding.

Stuart Steed - We can highlight as one of the barriers and try to take it forward. I think we can potentially model this because we've got the emissions report now from the feasibility study which shows you what they actually local HGV emissions are. So we can have some scenarios about shifting to cleaner technologies through the scheme.

Proposed actions - Policy Guidance and Development Control

- Integrate, where appropriate, AQAP targets into internal service plans - work is required to identify if appropriate to integrate AQAP into other service plans going forward; integrate the AQAP targets into other plans / policies e.g. Climate Change Action Plan, new Local Plan, updated Local Transport Plan, etc.
- Introduce a Social Value Policy - this could embed a scoring mechanism that favours emissions reduction.
- Review parking standards - review current parking standards policies and/or arrangements, ensure consideration is given to the successful management of EV parking bays as they are rolled out.
- Review transport provision policies for Home to School Transport and SEND transport functions - explore the gradual changeover to Ultra Low Emission Vehicles for transportation of pupils under these functions.

- Review contractual obligations and assess capability of providers in transitioning to Ultra Low Emission Vehicles – depends which types of contracts / providers are up for consideration.
- Assist in development of the Tree Strategy and Action Plan - ensure the developing Tree Strategy considers air quality (for example, choice and placement of vegetation).
- Continue to review and update the Air Quality Planning Guidance 2016 (Revised 2021)
- Develop operational protocols to enable Urban Traffic Management Control (UTMC) to respond to air pollution episodes.

Discussion: Policy Guidance and Development Control

Integrate, where appropriate, AQAP targets into internal service plans

Stuart Steed - This needs to stay in the AQAP - not achieved but we need to ensure it is to get the measures.

Introduce a Social Value Policy

Vicki Emrit - We have got social value policy guidance that's been drafted by our category management colleagues and that's available for Council staff to refer to. Though it is currently half a page, so it sets the foundation for social value development. All tenders have a list of social value measures included but officers select from a list of measures - CC have selected measures they'd like to see.

Stuart Steed - Haven't done the same thing for AQ – depends on ability to influence things.

Review parking standards

James Sutton - Michael Edwards may be able to provide an update but couldn't attend today - hasn't been updated for a while. Though we now have a dedicated EV project officer - taking forward the EV strategy being reviewed.

Vicki Emrit - Action in CCAP, EV parking bays continue to be managed by Council team – Vicki provided a contact to follow up with.

Review transport provision policies for Home to School Transport and SEND transport functions

James Sutton – Provided a contact to follow up with about this measure.

Review contractual obligations and assess capability of providers in transitioning to Ultra Low Emission Vehicles

James Sutton – Link this with EV project officer.

Assist in development of the Tree Strategy and Action Plan

Vicki Emrit – Provided us with a contact to follow up with on this action.

Continue to review and update the Air Quality Planning Guidance 2016 (Revised 2021)

Stuart Steed - EP team will implement this, action every 5 years but also if there are any large developmental changes - e.g. new Local Plan.

Develop operational protocols to enable UTMC to respond to air pollution episodes

Stuart Steed - Commitment in the last AQAP - sensor network pilot project to be continued - University of Newcastle - capabilities of this networks to inform decision making.

- No funding - sensors beyond serviceable life, would need to develop new systems and integrate with traffic management systems.
- Need Michael's input to say whether it's in the plans going forward - fits the Smart Cities agenda (used on red route scheme).

Proposed actions - Promoting Low Emission Transport

- Taxi and private hire ULEV feasibility study - feasibility study is underway, funded by the DEFRA Air Quality Grant Programme; consider a review of taxi licensing conditions, based on the outcome of the feasibility study.
- Deliver the EV Strategy 2022-27 - progress the delivery of the EV strategy and facilitate the installation of EV charging point infrastructure on council land and public highway to align with current and future demand, parking arrangements and budgets. Ensure the future long-term sustainability of EV charging by integrating infrastructure into new development.
- Expand the Rainham anti-idling campaign across Medway AQMAs - this measure would extend the anti-idling campaign to Gillingham and Central Medway AQMAs.
- Support local SMES to switch to ULEVs via the Kent REVS and other similar schemes - the scheme allowed any Kent business to try an electric vehicle for free for two months but ended in January 2023 consider plans for an extension or another similar scheme.
- Undertake a renewable electricity and heat energy generation opportunities study for Kent and Medway - undertake a review to establish the potential for solar PV within council owned car parks (solar canopies) and EV charging points, and large-scale sites (i.e., landfill).
- Ensure that all new technologies and ULEV options are considered when designing the new operations depot (Maidstone Road).

Discussion: Promoting low emission transport

Taxi and private hire ULEV feasibility study

Stuart Steed – On track to be complete by June – bring forward a cleaner license fleet refining policy options. Also links to the EV Strategy, can be assigned to EP.

Deliver the EV Strategy 2022-27

Stuart Steed – We will need to follow up with colleagues on this.

Explore opportunities to roll out the findings from the Rainham anti-idling campaign across other AQMAs

Stuart Steed - Awaiting final report from Uni of Kent., but headline figures are positive. Looking to implement this where there are roadworks.

Support local SMES to switch to ULEVs via the Kent REVS and other similar schemes

No comments.

Undertake a renewable electricity and heat energy generation opportunities study for Kent and Medway

Vicki Emrit – Likely unsuitable for air quality. See the link in terms of supporting EV charging infrastructure, and it's a key action in the climate change action plan, but it hasn't progressed, and I there's probably still work to do to get key officers in a room to discuss.

Ensure that all new technologies and ULEV options are considered when designing the new operations depot (Maidstone Road)

Vicki Emrit - Suggested contacts to follow up with.

Proposed actions - Public Transport

- Explore opportunities to support electrification of the bus fleet in Medway, focusing on routes through the AQMAs - explore opportunities for phased uptake of ULEV on supported bus routes.
- Introduce an Enhanced Bus Partnership with the local bus operator(s) - work with local bus operators to deliver the Bus Improvement Plan to realise the introduction of electric buses in Medway, including the identification of funding opportunities at national level
- Improve frequency and reliability of bus services (BSIP target 1) – increase bus patronage, conduct review of service frequency, develop traffic management schemes that contribute to more reliable bus journey times.
- Improve planning and integration of bus services with other modes of transport (BSIP target 2) – could include expansion of Quality Public Transport Corridors routes to support service, and consider investment in Superbus networks (high quality, frequent buses).
- Improve bus fares and ticketing (BSIP target 3) - investigate the potential for lower fares, including offers for children, students, the elderly, and other concessions.
- Improve bus passenger experience (BSIP target 4) - review of bus stop locations and facilities, invest in accessible and inclusive bus services.

Discussion: Public Transport

Explore opportunities to support electrification of the bus fleet in Medway, focusing on routes through the AQMAs

Stuart Steed - Worked with Arriva to put bids in for ULEV - would like to model this to help provide evidence for external funding and supporting operators.

Introduce an Enhanced Bus Partnership with the local bus operator(s)

No comments.

Improve frequency and reliability of bus services (BSIP target 1)

Rob Carmen - Ultimately depends on what the providers want to do:

- 95% journeys are Arriva
- Council is limited in what it can do to support. Medway support evening and weekend key services.
- Little funding unless significant S106 funding came in from Hoo situation
- Best thing the council can do is traffic management to make the bus companies' jobs easier and keep the quality of services

BSIP Targets 2, 3 & 4

Rob Carmen - Main focus is on keeping the services going and keeping availability and stability. We have not seen any reductions in commercial or supportive services which is really positive, so this action should focus on this. Hope Arriva continue to invest in Medway. I think the key thing of the Council we can do is to try and ensure we keep the networkers free running as possible, signalisation enforcement of roads, Red Routes.

Charlotte Day – Based on today's discussions - focus on the BSIP target one and three probably and reframe this slightly in the action plan to talk about the things we've already discussed, like the trials you've been doing on the improved fares, and the traffic management aspect.

Proposed actions - Medway Council Fleet (Leading by example)

- Centralise council vehicle mileage data collection - centralise data collection for Council vehicles, including mileage, maintenance, and replacements / upgrades.
- Replace Council fleet of small vehicles with low-emission alternatives at next point of exchange - replace Council fleet of small vehicles (owned and leased) with electric by end of first carbon budget (2027) or where possible at next point of exchange (2025).
- Review potential emission reduction options for Refuse Collection Vehicles (RCV) fleet - including impact on service design, available infrastructure, and fuel type.
- Deliver phased replacement of RCV fleet with alternative fuel technology from 2030.
- Promote Medway Council staff sustainable travel options and expand offering - assist Medway Council staff in preparing workplace travel plans, promote staff discount for bus travel, explore improvements to the Gun Wharf shower, changing, and cycle facilities to support improved active travel to work.

- Review options for renewable energy generation on Council-owned land - explore the potential for large scale solar PV generation on Council-owned land and through the acquisition of land from third parties.

Discussion: Medway Council Fleet – Leading by example

Centralise council vehicle mileage data collection

Vicki Emrit - Progress has already been made. I think the emphasis should be on the kind of the next ones around replacing base replacement of fleet. Suggest we remove this one.

Oliver Marshall – Potentially include this measure as a sub-measure within one of the below.

Replace Council fleet of small vehicles with low-emission alternatives at next point of exchange

Vicki Emrit – Definitely keep in. There are barriers surrounding this though.

Charlotte Day – If there is data available on what the Council's fleet looks like, then we can do specific fleet modelling to demonstrate emission improvements.

Review potential emission reduction options for Refuse Collection Vehicles (RCV) fleet.

Stuart Steed - Potential to model improvements to this fleet, similar to the Council Fleet.

Deliver phased replacement of RCV fleet with alternative fuel technology from 2030.

No comments.

Promote Medway Council staff sustainable travel options and expand offering.

James Sutton – Want to take this forward, but as we found with some of the others, it's resource staff resources to be able to actually move this.

Stuart Steed - We have an opportunity with our Gun Wharf office issues, keep in.

Daren Warner - Upgrading of shower/changing room facilities and cycle storage should be an essential part of the Gun Wharf works.

Review options for renewable energy generation on Council-owned land

No comments.

Proposed actions - Domestic Emissions and

$PM_{2.5}$

- Promote and support the Kent and Medway Warm Homes Scheme and other domestic energy efficiency and fuel poverty projects - focus on projects being delivered through the Kent Energy Efficiency Partnership, promote schemes and advice already available online (Kent and Medway Warm Homes Scheme) and highlight the links between improving energy efficiency and reducing domestic emissions.
- Promote schemes to improve domestic and business energy efficiency – for example Home Upgrade Grant (HUG) 2, Green homes grant, LOCASE (Low Carbon Across the South East) grant support programme for local businesses (now closed).

- Establish a public sector building retrofit programme in partnership with Kent County Council - focus on identifying joint initiatives that maximise economies of scale, determine scope for a cross-sector location-based approach, identifying quick wins and how the Councils can work with private investors to scale up retrofit across Kent and Medway, and look to scale up to support housing retrofits.
- Consider expansion of Medway's Smoke Control Area - parts of Medway Council's district are within a Smoke Control Area but could consider expanding the SCA to the whole of Medway Council's District.
- Solid fuel burning public information campaign – including public information campaign to raise awareness and highlight the impacts of open burning on air pollution (focus on health impacts), and highlight Defra's "Burn Better" Solid Fuel Burning Campaign.
- Develop a bonfire policy - the Council has a responsibility to investigate complaints of smoke and fumes that could be classed as a 'statutory nuisance'; however, development of an educational Bonfire Policy could help reduce such incidents; consider developing a Bonfire Policy to provide guidance for residents to make better decisions around when, where, and how to have their bonfires; inform residents about the human and environmental health impacts of bonfires.

Discussion: Domestic Emissions and $PM_{2.5}$

Promote and support the Kent and Medway Warm Homes Scheme and other domestic energy efficiency and fuel poverty projects

Vicki Emrit – Provided a contact for the housing strategy. Housing strategy consultation closed to comments recently but may still be able to have discussion with the team.

Promote and support the Kent and Medway Warm Homes Scheme and other domestic energy efficiency and fuel poverty projects

Vicki Emrit – Potential to reframe around buildings and ventilation, not just energy.

Stuart Steed - Grants to improve heating systems, thermal insulation and ventilation.

Establish a public sector building retrofit programme in partnership with KCC

No comments.

Consider expansion of Medway's Smoke Control Area

Stuart Steed - FPN can now be used and got a Defra grant for this.

Solid fuel burning public information campaign

Stuart Steed - Easy to achieve and ties into comms strategy and work on seasonal pollution episodes.

James Flower - Add to comms campaign. Also add in indoor AQ and link these - partners want to focus on this.

Develop a bonfire policy

Stuart Steed - Bit more difficult, needs input from the noise and nuisance team

Recommendations for air quality modelling

[Patrick Harland, Ricardo]

- There are a variety of measures that would be suitable for modelling/further assessment.
- Bus electrification
    - Potential to model air quality improvements within the AQMAs as a result of an agreed % of the fleet upgrading to EVs
    - Potential to support in acquiring funding for bus upgrades / replacements
- Deliver the vision in Medway's Electric Vehicle Strategy
    - Modelling could demonstrate potential air quality improvements achieved by EV uptake as a result of the EV Strategy actions
- Moving Council Fleet away from petrol/diesel vehicles to alternative, low-emission fuels (e.g., electric)
    - Potential to model the emissions reduction that could be achieved by upgrading vehicles due for replacement (providing there is information available on the Council's fleet)
    - A good measure to show the Council is 'leading by example'
- Increased uptake in active travel
    - Modelling could demonstrate potential air quality improvements achieved by removing vehicles from the roads

Discussion: Recommendations for air quality modelling

Stuart Steed – We have committed to replacing our refuse collection fleet. This could be a scenario that we model. There should be data available on what and Vicky might be able to help point us in the right direction of the data, but that would be potentially one to take forward or it will be the HGV scenario. Happy with the other two measures. Increase uptake in active travel would be challenging.

Next steps [Charlotte Day, Ricardo]

- Meeting minutes and copy of slides will be distributed. Please provide further feedback on measures by email by Tuesday 13th February.
- Development of a draft Action Plan will follow, including refining the longlist of measures to a shortlist based on workshop outcomes, completing the detailed measures table, and assessment of the impact on air quality of specific measures (air quality modelling).
- Public consultation on the draft Action Plan will be supported by Ricardo.
- Finalisation of the Action Plan will follow the consultation and comments from Defra.

Glossary of Terms

Abbreviation	Description
AADT	Annual Average Daily Traffic
ANPR	Automatic Number Plate Recognition
AQAP	Air Quality Action Plan – A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQO	Air Quality Objective
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
BSIP	Bus Service Improvement Plan
Defra	Department for Environment, Food and Rural Affairs
DT	Diffusion Tube
EFT	Emissions Factors Toolkit
EU	European Union
HGV	Heavy Goods Vehicle
HUG	Home Upgrade Grant
KEEP	Kent Energy Efficiency Partnership

Abbreviation	Description
LAQM	Local Air Quality Management
LCWIP	Local Cycling and Walking Infrastructure Plan
LGV	Light Goods Vehicle
LOCASE	Low Carbon Across the South East
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
PM	Particulate Matter
PM_{10}	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
$PM_{2.5}$	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
RCV	Refuse Collection Vehicle
RMSE	Root Mean Square Error
SO_2	Sulphur Dioxide
UTMC	Urban Traffic Management Control
WHO	World Health Organization