



Strategic Environmental Assessment for The Arches Neighbourhood Plan



Environmental Report to accompany the submission version of The Arches Neighbourhood Plan

The Arches 'Chatham' Neighbourhood Forum

January 2022

Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
Ryan Putt Senior Environmental Planner	Nick Chisholm- Batten Associate Director	Alastair Peattie Associate Director	Alastair Peattie Associate Director

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Prepared for:

The Arches 'Chatham' Neighbourhood Forum

Prepared by:

AECOM Limited
Aldgate Tower
2 Lemn Street
London E1 8FA
United Kingdom
aecom.com

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Front cover: Chatham Railway Bridge (Luton Arches) following the recent refurbishments which were completed in April 2021. Article accessible on [Future Chatham](#) website.

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Non-Technical Summary

What is Strategic Environmental Assessment?

A strategic environmental assessment (SEA) has been undertaken to inform The Arches Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is The Arches Neighbourhood Plan?

The Arches Neighbourhood Plan (hereafter referred to as the “ANP”) has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the ANP, is the latest document to be produced as part of the SEA process. The initial document was the SEA Scoping Report (July 2021), which includes information about the ANP area’s environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the ANP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the ANP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the ANP has been assessed.
- The appraisal of alternative approaches for the ANP.
- The likely significant effects of the ANP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the ANP; and
- The next steps for the ANP and accompanying SEA process.

Assessing reasonable alternatives through the SEA

The SEA Regulations highlight that the Environmental Report ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. For SEAs for Neighbourhood Plans, ‘reasonable alternatives’ are typically considered for alternative approaches to locating development in a Neighbourhood Plan area.

During the preparation of the Neighbourhood Plan, the Neighbourhood Forum sought to consider the various sites which were available in the Neighbourhood Plan area for development. This was with the aim of shaping development at these locations through the introduction of appropriate Neighbourhood Plan planning policies.

A key objective of the Neighbourhood Plan is to support the regeneration of town centre brownfield sites with a view to delivering affordable housing, community provision and public realm enhancements. This includes through the facilitation of improvements in the quality of the townscape, the implementation of high-quality urban design, and the conservation and enhancement of the historic environment.

The current version of the Neighbourhood Plan presents planning policies for nine sites in the Neighbourhood Plan area. The sites included are those where the Neighbourhood Forum view that site policies have the most potential to provide benefits in terms of delivering high quality development which meets the aims of the Neighbourhood Plan.

These site policies were informed by a site assessment process undertaken by the Neighbourhood Forum for the purposes of the Neighbourhood Plan¹. This focussed on the opportunities available through development of the sites.

A total of 15 potential development sites were initially identified by the Neighbourhood Forum. Following initial consideration of these sites, three sites were discontinued for further evaluation based on their current community usage as greenspaces, or potential community usages.

Planning policies for the remaining twelve sites were subsequently presented at Regulation 14 consultation. Following consultation, the list of sites for which planning policies had been proposed were subsequently modified due to the following reasons: land ownership issues, landowner(s) not wishing the site(s) to be included in the Neighbourhood Plan, or given the existing community function of the site(s). As a result, the latest version of the Neighbourhood Plan puts forward planning policies for nine sites.

The SEA has not assessed sites as reasonable alternatives. Whilst the Neighbourhood Plan has presented planning policies for the nine sites, it does not seek to preclude high quality development in other locations in the town centre which meet the policies of the Neighbourhood Plan. In this respect, the ANP is strongly design focused, with the Arches Design Code prepared to support the Neighbourhood Plan. The Design Code sets out parameters for development in the neighbourhood area which covers street design, residential extensions, re-development of alleyways and new developments.

¹ The process for the site assessment is presented in the Site Allocations Report accompanying the ANP.

In light of this, it was not appropriate to undertake an assessment of alternative locations for development through the SEA process for the ANP. This is given the ANP takes a supportive approach to high quality development which meets the vision and objectives of the Neighbourhood Plan, and does not aim to preclude appropriate development in other locations outside of the nine sites for which planning policies are proposed.

Instead, for the purposes of the SEA, the planning policies proposed for the nine sites have been assessed as part of the plan appraisal presented in **Chapter 5** of this Environmental Report.

Assessment of the submission version of The Arches Neighbourhood Plan

The submission version of the ANP presents 25 planning policies for guiding development in the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering. Earlier draft versions of the policies have been revisited and updated in light of the responses which were received at Regulation 14 consultation, and through recommendations and suggestions proposed through the SEA process to date.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the submission version of the ANP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the submission version of the ANP. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

- Air Quality.
- Biodiversity.
- Climate Change.
- Historic Environment and Townscape; and
- Community Wellbeing.

The assessment has concluded that the submission version of the ANP is likely to bring significant positive effects in relation to the Historic Environment and Townscape SEA Theme. These benefits largely relate to the ANP's emphasis on protecting and enhancing townscape character (and features), delivering high-quality design which respects and enhances local distinctiveness and the built environment, facilitating improvements to quality of the public realm, encouraging high-quality design which is informed by a thorough analysis into the potential impact to heritage assets, and increasing awareness, understanding and appreciation of the historic environment. Given the Design Guide accompanying and underpinning the ANP also sets out a comprehensive range of provisions relating to the built environment, this will help provide an appropriate basis for the conservation and enhancement of the heritage assets and townscape features located within the setting of the proposed site allocations.

The Neighbourhood Plan also has the potential to have significant positive effects in relation to the Community Wellbeing SEA theme. This relates to the ANP's focus on delivering housing which meets local needs, maximising accessibility to services,

facilities, and opportunities, promoting health and wellbeing and supporting community and economic vitality and social inclusion.

Additionally, the ANP will bring positive effects in relation to the Biodiversity SEA Theme by supporting net gains for biodiversity within new development proposals, enhancing ecological networks through green infrastructure enhancements (including through supporting proposals which deliver linear parks and ecological corridors), and improving ecological resilience.

Regarding the Climate Change SEA Theme, the ANP will potentially lead to positive effects through supporting proposals which deliver energy efficient designs and layouts, proactively respond to the potential impacts of climate change (e.g. the urban heat island effect, and flood risk concerns from increased storms / rainfall events), and by encouraging active and sustainable travel within the ANP area. However, this is dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.

The ANP will also initiate several beneficial approaches regarding the 'Air Quality' SEA Theme, given its focus on enhancing the active travel network (including public rights of way and cycle routes), supporting healthy streets and low-traffic neighbourhoods, and encouraging a greater use of sustainable modes of transportation in the medium-to-long-term.

Next steps

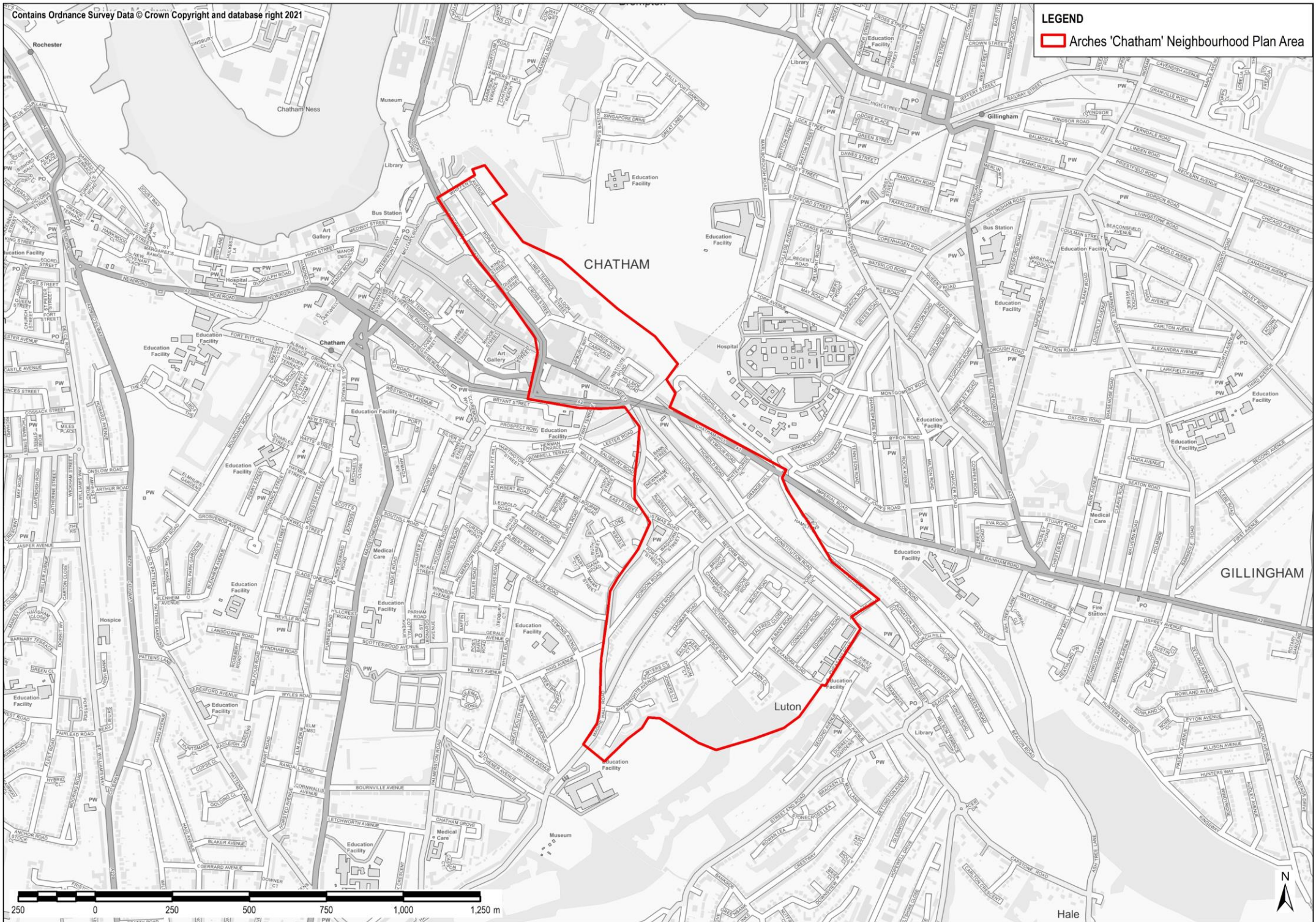
The SEA Environmental Report accompanies the submission version of the ANP to the responsible authority, Medway Council, for Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the ANP will be subject to a referendum, organised by Medway Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the ANP will become part of the development plan for the ANP area.

LEGEND

Arches 'Chatham' Neighbourhood Plan Area



1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Arches Neighbourhood Plan, which, when made, will cover part of Chatham town centre in Kent.
- 1.2 The Arches Neighbourhood Plan is being prepared under the Localism Act (2011) and the Neighbourhood Planning (General) Regulations 2012. It is being prepared to be in general conformity with the Medway Local Plan 2003, with due regard to the emerging Medway Local Plan (2019 to 2037).
- 1.3 Key information relating to The Arches Neighbourhood Plan is presented in **Table 1.1**.

Table 1.1: Key facts relating to The Arches Neighbourhood Plan

Name of Responsible Authority	Arches 'Chatham' Neighbourhood Forum
Title of Plan	Arches Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Arches Neighbourhood Plan (ANP) is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Adopted Medway Local Plan (2003- 2018), with due regard given to the emerging Medway Local Plan (2019- 2037).</p> <p>The ANP will be used to guide and shape development within the Neighbourhood Plan area.</p>
Timescale	To 2037
Area covered by the plan	The Plan area covers part of the town centre of Chatham. The boundary is highlighted in the figure above.
Summary of content	The ANP will set out a vision, strategy, and range of planning policies for the Neighbourhood Plan area.
Plan contact point	Lydia Ogden, Neighbourhood Plan Coordinator Email: lydia@createstreets.com

SEA Screening for The Arches Neighbourhood Plan

- 1.4 The ANP was screened in by Medway Council in April 2021 as requiring a Strategic Environmental Assessment (SEA)².
- 1.5 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, the ANP has been screened in as requiring an SEA process for the following reasons:
 - The Neighbourhood Plan will set the framework for development in environmentally sensitive locations, such as:
 - locations with sensitivity for the historic environment, including nationally designated listed buildings, scheduled monuments, and conservation areas.
 - The ANP area is located within proximity to four Special Protection Areas (and Ramsar sites), upon which there is potential for recreational disturbance impacts associated with new residential developments.
- 1.6 In light of this screening outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

SEA explained

- 1.7 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.
- 1.8 The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the ANP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.9 This is the second document to be produced as part of the SEA process. The first was the SEA Scoping Report (July 2021). This Environmental Report will accompany the submission version of the ANP.

² Medway Council (April 2021): The Arches Neighbourhood Plan SEA and HRA Screening Report, report provided by the Neighbourhood Forum, contributing to the evidence base for the ANP.

Structure of this SEA Environmental Report

1.10 This document is the SEA Environmental Report for the ANP and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the SEA Environmental Report to meet the regulatory³ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁴
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	<ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The relevant environmental protection objectives established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the submission version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making / SEA process.

³ Environmental Assessment of Plans and Programmes Regulations 2004

⁴ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the Neighbourhood Plan

Local Plan context for The Arches Neighbourhood Plan

- 2.1 The Medway Local Plan was adopted in May 2003. This sets out the land use policies to meet Medway's economic, environmental, and social needs and aims for the future and provides the framework for all subsequent documents which form part of the adopted Local Plan.
- 2.2 Medway Council is currently in the process of preparing a new Medway Local Plan for the area which will replace the adopted Medway Local Plan and cover the period between 2019 and 2037. It is anticipated that the emerging Medway Local Plan (2019-2037) will be adopted later in 2022. Regulation 18 consultations to date have included the following:
- Issues an options consultation in February 2016.
 - Development options consultation between January and May 2017; and
 - Development strategy consultation between March and June 2018.
- 2.3 There is an identified housing need in the ANP area (although the Forum have not been provided with a specific target from Medway Council) and several suitable sites have been identified through the Neighbourhood Planning process to date, including through a Site Options and Assessment process. This is further discussed within **Chapter 4** of this Environmental Report.
- 2.4 Neighbourhood plans will form part of the development plan for Medway Council, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Medway, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

Vision, aims, and objectives for the Neighbourhood Plan

- 2.5 Developed during the earlier stages of plan making and via community consultation, the vision for the ANP is as follows:

“

To transform the neighbourhood area into a beautiful, green and prosperous place in which people wish to stay, live and work; a neighbourhood to raise children, help others and grow old; a place in which people can rediscover a sense of community, pride and purpose; a place with a beating heart.

Vision Statement for The Arches Neighbourhood Plan

”

2.6 The vision statement for the ANP is underpinned by the following strategic aims for development during the plan period:

- Revitalise the local economy by reviving the high street along Luton Road, and by making the Arches area a desirable place to do business.
- Creating beautiful, high-quality, and affordable homes that create a cohesive and multi-generational community.
- Providing safe, inclusive, and pleasant streets and public spaces that protect our environment and will be embraced by all.
- Creating a car-lite neighbourhood in which residents reclaim the streets for walking, cycling, playing, and shopping.
- Protecting and improving community facilities and ensuring that no resident is left behind.

3. What is the scope of the SEA?

Summary of SEA Scoping

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.⁵ These authorities were consulted on the scope of the SEA in July 2021.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the ANP.
 - Baseline data against which the ANP can be assessed.
 - The key sustainability issues for the ANP; and
 - An ‘SEA Framework’ of objectives against which the ANP can be assessed.
- 3.3 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Historic England	
<i>Historic Places Adviser (email response received on 29th August 2021)</i>	
We are happy to confirm that the draft document generally provides a good summary of the heritage of the neighbourhood plan area and its surroundings including the heritage assets that could be affected indirectly by change within their setting. Nevertheless, there are a number of amendments that we recommend making.	Comment noted.
The Scoping report is helpful in highlighting the scheduled area of the Chatham Lines just to the north of the plan area as a key receptor of effects. Part of the importance of the lines is their extent and role in defining the military area, which is reflected in the extent of the scheduling designation. Although largely outside the neighbourhood plan area it would be helpful to illustrate this for which an extract from the National Heritage List online map may be acceptable (see attached).	Potential impacts to the setting of heritage assets located within and within proximity to the proposed site allocations is discussed through the appraisal of the Neighbourhood Plan policies. This is presented within Chapter 5 of the Environmental Report, specifically within the Historic Environment and Townscape section of the chapter.

⁵ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme’.

Consultation response	How the response was considered and addressed
<p>The Brook Low Level Pumping Station is a scheduled monument that lies just outside the neighbourhood plan area south west of The Brook, from which it is accessed. The monument's setting has been harmed by the construction of very large structures in its surroundings that reduce its visibility and provide a poor quality of urban environment reducing its appreciation (including the Halford's Auto Parts Store and monolithic mule-storey car park facing The Brook).</p>	<p>Comment noted. Potential impacts to the setting of heritage assets located within and within proximity to the proposed site allocations is discussed through the appraisal of the Neighbourhood Plan policies. This is presented within Chapter 5 of the Environmental Report, specifically within the Historic Environment and Townscape section of the chapter.</p>
<p>We recommend being even plainer about the potential for effects to the views from the Grade I listed Naval Memorial. Some past developments in the town centre have resulted in harm to these views both from the memorial and the wider viewing area of the Great lines Heritage Park through their poor architectural quality and dominating sled-style massing (notably the multi-storey car park. There is potential for cumulative impact from development within the neighbourhood plan area that exacerbates this effect and, as such, care is needed to ensure the plan brings forward development that enhances rather than results in cumulative impacts to these views. The neighbourhood plan group may wish to review the existing Chatham Tall Buildings Supplementary Planning Guidance to determine whether this provides adequate recognition of past impacts and potential additional impacts or whether the neighbourhood plan could provide some revision that would enhance protection of views out from this important heritage asset and public green open space.</p>	<p>Comment noted. The Chatham Tall Buildings Supplementary Planning Guidance has been a useful source of reference.</p> <p>Potential impacts to the setting of heritage assets located within and within proximity to the proposed site allocations is discussed through the appraisal of the Neighbourhood Plan policies. This is presented within Chapter 5 of the Environmental Report, specifically within the Historic Environment and Townscape section of the chapter.</p>
<p>We hope these comments are of assistance but would be pleased to answer any queries that may relate to them.</p>	<p>Comment noted.</p>
<p>Environment Agency <i>Sustainable Places Team Leader, Kent (email response received on 5th August 2021)</i></p>	
<p>We are unable to provide bespoke comments but can offer the attached general advice.</p>	<p>The neighbourhood planning advice for the Kent, South London, and East Sussex area (dated February 2021) as provided by the Environment Agency was shared with the Neighbourhood Forum for their consideration and was a useful source of reference during the subsequent stages of the SEA.</p>

Consultation response	How the response was considered and addressed
<p>Natural England <i>Sustainable Development Adviser: Sussex and Kent Team (email response received on 4th October 2021)</i></p>	
<p>Having reviewed the report in the light of our previous advice (our reference 346766 in relation to SEA screening), we advise that it would be useful to include the specific risk to the internationally designated sites, that is from recreational disturbance resulting from residential development. This could be added into the Key Issues text, for example by adding in a reference in section 3.11, along the lines of:</p> <p>'Medway Estuary & Marshes is an internationally and nationally designated site which may be impacted by future development in the Neighbourhood Plan area. In particular, the likely detrimental impact resulting from any residential development has been identified. The species and habitats designated within these sites should be protected during the planning process wherever possible.'</p>	<p>The key issues for the Biodiversity SEA Theme have been enhanced to include the additional text.</p> <p>The Habitats Regulations Assessment (HRA) accompanying the Neighbourhood Plan recommends the inclusion of an additional policy with a focus on the protection of internationally designated sites. The HRA concludes that if the additional policy wording is included within the ANP, the potential adverse impacts to national site network sites regarding recreational disturbances shall be appropriately mitigated.</p> <p>Potential impacts to the designations located within and within proximity to the proposed site allocations is further discussed through the appraisal of the Neighbourhood Plan policies. This is presented within Chapter 5 of the Environmental Report, specifically within the Biodiversity section of the chapter.</p>
<p>We also refer you to the general advice in the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>	<p>The annex provided by Natural England was shared with the Neighbourhood Forum for their consideration and was also a useful source of reference during the subsequent stages of the SEA.</p>

3.4 Baseline information (including the context review and baseline data) is presented in **Appendix A** of this Environmental Report. The key sustainability issues and SEA Framework are presented below.

Key Sustainability Issues

Air Quality

- The 2020 Annual Status Report (ASR) highlights that there is one Air Quality Management Area (AQMA) within the Plan area: Central Medway AQMA, though levels of nitrogen dioxide (NO₂) exceedances have decreased since its declaration in 2010.
- Medway is noted to suffer significant congestion, which is a key source of air pollution at major roads in the Plan area, particularly the A2.

- There is scope for air quality improvements to be supported within the Plan area through green infrastructure enhancements and improvements to the public realm.

Biodiversity

- Medway Estuary & Marshes is an internationally and nationally designated site which may be impacted by future development in the Neighbourhood Plan area. In particular, the likely detrimental impact resulting from any residential development has been identified. The species and habitats designated within these sites should be protected during the planning process wherever possible.
- Additionally, growth in the ANP area should seek to avoid the loss or fragmentation of Priority Habitats and dispersal of species and seek to protect and enhance these features wherever possible.

Climate Change

- The Arches area is partly affected by areas of high fluvial and surface water flood risk. The Neighbourhood Plan has the potential to support the more effective management of flood risk in the area. In areas of surface water flood risk, development which provides improved drainage could also reduce flood risk in the long-term. Furthermore, it will be important for any development in the vicinity of flood risk areas to ensure that suitable drainage is provided which ensures development will not lead to adverse effects on water quality.
- There are opportunities to maximise local renewable energy and electric vehicle infrastructure development, as well as new green infrastructure and improved ecological links, to complement the existing climate change action plans. Supporting proposals for electric vehicle (EV) charging points will be beneficial to improve access to such infrastructure for residents.

Historic Environment and Townscape

- Designated heritage assets within the Plan area, including listed buildings, the Conservation Area and Scheduled Monuments are afforded protection under existing legislative provisions and strategic level policies. However, it will be important for new development proposals to conserve, and where possible, enhance the historic significance of these features and areas.
- There are also a range of non-designated features recognised for their local importance for the historic environment, but not offered statutory protection. The significance of these should also be conserved and enhanced.
- The townscape character and historic environment of the Plan area is vulnerable to inappropriate development and townscape change. Important townscape features within the Plan area such as the Great Lines and are highly sensitive to potential negative amenity from inappropriate development that undermines the character of the area's unique townscape.

Land, Soil, and Water Resources

- Predictive studies indicate that, without intervention, there will be water scarcity in the Medway Upper Water Resource Zone (WRZ). Water supply

issues in line with the Water Resources Management Plan will be applied through the planning permission process.

3.5 Given the urban nature of the Plan area, with the only opportunities for development being previously developed land, and existing legislative provisions relating to water quality and supply, **the Land, Soil, and Water Resources Theme has been scoped out of the SEA process.**

Community Wellbeing

- Health in the Plan area is generally good, and this trend is likely to continue. However, long term health conditions remain an issue.
- There are several issues relating to the local economy of Chatham.
- There are several barriers to the housing market for residents in Chatham. Supporting affordability requirements in the emerging Local Plan will enable more people to buy homes in Chatham.
- Levels of deprivation in Chatham are high with regards to many indices.
- Crime rates are also notably higher in the two wards in the Plan area than elsewhere in Chatham.

SEA Framework

3.6 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard ‘tests’. Each proposal within the current version (i.e. the submission version) of the ANP will be assessed consistently using the framework.

Table 3.2: SEA Framework of objectives and assessment questions

SEA Objective	Assessment questions to consider for the allocations / proposals within the Arches Neighbourhood Plan
Air Quality	
Support improvements to air quality and reductions of air pollution within the Neighbourhood Plan area.	Will the option/proposal help to: <ul style="list-style-type: none"> • Improve air quality in the Plan area? • Reduce the impact of development at air pollution hotspots? • Support enhancements to the public realm which limit the impacts of poor air quality on residents?

SEA Objective	Assessment questions to consider for the allocations / proposals within the Arches Neighbourhood Plan
Biodiversity	
<p>Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on nationally and locally designated sites, and delivering demonstrable biodiversity net gains.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of internationally, nationally, and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites? • Protect and enhance priority habitats and species and the areas that support them? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate Change	
<p>Reduce the contribution to climate change made by activities within the Neighbourhood Plan area.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Promote the use of sustainable modes of transport including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources? • Support proposals for EV charging infrastructure?
<p>Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water runoff, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?

SEA Objective	Assessment questions to consider for the allocations / proposals within the Arches Neighbourhood Plan
Historic Environment and Townscape	
<p>To protect and enhance the historic character and quality of the immediate and surrounding townscape.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings? • Protect and enhance the historic integrity of the Great Lines? • Conserve and enhance the Brompton Lines Conservation area? • Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Kent Historic Environment Record (HER)? • Protect and/ or enhance local character and quality of place? • Conserve and enhance local identity, diversity, and settlement character? • Identify and protect locally important viewpoints which contribute to character and sense of place? • Protect visual amenity and locally important views? • Retain and enhance features that contribute to the river setting, or rural setting, including trees and hedgerows?
Community Wellbeing	
<p>Ensure growth in the Plan area is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote social cohesion and active involvement of local people in community activities? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing residents?

4. Assessing reasonable alternatives through the SEA

- 4.1 The SEA Regulations highlight that the Environmental Report ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. For SEAs for Neighbourhood Plans, ‘reasonable alternatives’ are typically considered for alternative approaches to locating development in a Neighbourhood Plan area.
- 4.2 During the preparation of the Neighbourhood Plan, the Neighbourhood Forum sought to consider the various sites which were available in the Neighbourhood Plan area for development. This was with the aim of shaping development at these locations through the introduction of appropriate Neighbourhood Plan planning policies.
- 4.3 A key objective of the Neighbourhood Plan is to support the regeneration of town centre brownfield sites with a view to delivering affordable housing, community provision and public realm enhancements. This includes through the facilitation of improvements in the quality of the townscape, the implementation of high-quality urban design, and the conservation and enhancement of the historic environment.
- 4.4 The current version of the Neighbourhood Plan presents planning policies for nine sites in the Neighbourhood Plan area. The sites included are those where the Neighbourhood Forum view that site policies have the most potential to provide benefits in terms of delivering high quality development which meets the aims of the Neighbourhood Plan.
- 4.5 These site policies were informed by a site assessment process undertaken by the Neighbourhood Forum for the purposes of the Neighbourhood Plan⁶. This focussed on the opportunities available through development of the sites.
- 4.6 A total of 15 potential development sites were initially identified by the Neighbourhood Forum. Following initial consideration of these sites, three sites were discontinued for further evaluation based on their current community usage as greenspaces, or potential community usages.
- 4.7 Planning policies for the remaining twelve sites were subsequently presented at Regulation 14 consultation. Following consultation, the list of sites for which planning policies had been proposed were subsequently modified due to the following reasons: land ownership issues, landowner(s) not wishing the site(s) to be included in the Neighbourhood Plan, or given the existing community function of the site(s). As a result, the latest version of the Neighbourhood Plan puts forward planning policies for nine sites.
- 4.8 The SEA has not assessed sites as reasonable alternatives. Whilst the Neighbourhood Plan has presented planning policies for the nine sites, it does not seek to preclude high quality development in other locations in the town centre which meet the policies of the Neighbourhood Plan. In this respect, the ANP is strongly design focused, with the Arches Design Code prepared to support the Neighbourhood Plan. The Design Code sets out parameters for

⁶ The process for the site assessment is presented in the Site Allocations Report accompanying the ANP.

development in the neighbourhood area which covers street design, residential extensions, re-development of alleyways and new developments.

- 4.9 In light of this, it was not appropriate to undertake an assessment of alternative locations for development through the SEA process for the ANP. This is given the ANP takes a supportive approach to high quality development which meets the vision and objectives of the Neighbourhood Plan, and does not aim to preclude appropriate development in other locations outside of the nine sites for which planning policies are proposed.
- 4.10 Instead, for the purposes of the SEA, the planning policies proposed for the nine sites have been assessed as part of the plan appraisal presented in **Chapter 5** of this Environmental Report.

Current approach in the Arches Neighbourhood Plan and the development of policies

Choice of sites taken forward for the purposes of the Arches Neighbourhood Plan

- 4.11 The submission version of the ANP presents planning policy provisions for nine sites in the Neighbourhood Plan area. These are set out through Policy HO4, the 'Site Allocations' section within the ANP (see pages 38 to 47), and the Design Code which accompanies the ANP.

Neighbourhood Plan policies

- 4.12 To support the implementation of the vision statement for the Neighbourhood Plan, the current version (i.e. the submission version) of the ANP puts forward 25 policies to guide development within the ANP area. Earlier draft versions of the policies have been revisited and updated in light of the responses which were received at Regulation 14 consultation, and through recommendations and suggestions proposed the SEA process to date.
- 4.13 Policies were developed following extensive community consultation and evidence gathering and are listed below in **Table 4.1**.

Table 4.1: Neighbourhood Plan policies

Reference	Policy Name
Local Economy	
Policy E1	Encouraging New Business
Policy E2	Mixed-use Development
Policy E3	Retail Frontages
Policy E4	Healthy Businesses
Housing	
Policy HO1	Affordable Housing
Policy HO2	Beautiful Design
Policy HO3	Family Housing
Policy HO4	Site Allocation

Reference	Policy Name
Policy HO5	HMOs
Policy HO6	Outdoor Space
Policy HO7	Historic Environment
Policy HO8	New and Improved Utility Infrastructure
Built and Natural Environment	
Policy BNE1	Public Realm Enhancement
Policy BNE2	Local Green Spaces
Policy BNE3	Open Spaces
Policy BNE4	Street Trees
Sustainable Transport	
Policy ST1	Air Quality
Policy ST2	Safe Routes for Pedestrians
Policy ST3	Humanising Luton Road
Policy ST4	Parking
Policy ST5	Active Transport
Community Spaces	
Policy CS1	Safeguarding Existing Social Infrastructure
Policy CS2	Provision of Sports Facilities and Play Spaces
Policy CS3	Luton Road Shoppers Car Park, Go Outdoors and Bingo Hall
Policy CS4	Enhancing Existing Green Spaces

5. What are the appraisal findings at this current stage?

Introduction

5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the ANP. This chapter presents:

- An appraisal of the current version (i.e. the submission version) of the ANP under the five SEA Theme headings; and
- The overall conclusions at this current stage.

Appraisal of earlier versions of the ANP policies

5.2 Prior to the finalisation of the submission version of the ANP, the SEA team undertook an appraisal of earlier versions of ANP policies. At that stage, the following recommendations were made to plan makers for further improving the sustainability performance of the ANP.

5.3 These recommendations included (organised by SEA theme):

Biodiversity

- Opportunity to strengthen a relevant policy with additional wording regarding biodiversity net gains, for example: *“Development proposals shall be encouraged to deliver measurable, proportionate and appropriate biodiversity net gains through design, where applicable.”* Natural England have recently developed a biodiversity metric tool specifically for smaller sites (accessible [here](#)), which could be appropriate for some of the site allocations.
- Where appropriate, new development proposals could seek to incorporate measures to attract wildlife to the sites. This could include measures such as the use of boxes or bricks for birds, small mammals, bats, bees, or invertebrates. Appreciation that some of these measures may be stated within the Design Code, but perhaps they could also be more readily acknowledged within a relevant policy.
- Consideration of the findings and recommendations of the HRA, with a view to strengthening policy wording where relevant.

Climate Change

- Encouraging initiatives which seek to proactively respond to Medway Council’s declaration of a climate emergency in April 2019. This may include the inclusion of measures which seek to deliver low-carbon solutions within development. For example, via the use of renewables where appropriate and viable, securing energy efficiency levels to the latest standards (i.e. Passiv House Standards), and supporting retrofits to existing buildings wherever practicable (see Historic England’s guidance for retrofitting historic buildings, accessible [here](#)).

- For any site allocations with an identified flood risk, planning applications could be encouraged to complete a site-specific flood risk assessment in line with the requirements of national policy and advice. Otherwise, the existing policy measures relating to the use of appropriate drainage features and permeable materials through design, are appropriate.
- Encouraging proposals to ensure that appropriate drainage infrastructure is available to serve new development areas in order to not overbear the existing network or add to difficulties with local water supplies, sewerage and sewage treatment, and waste disposal.
- Potential to include a statement within a relevant policy which encourages proposals to source construction materials locally and use recyclable materials wherever possible. Whilst this is difficult to enforce, it will demonstrate a positive and proactive response to the climate emergency by supporting proposals which seek to reduce embedded carbon and work towards delivering carbon neutrality through design.

Historic Environment and Townscape

- With reference to the setting of designated and non-designated heritage assets (including views into and out of these features), development proposals could be encouraged to complete a proportionate heritage impact assessment at the planning application stage to help to understand the significance of the heritage features and the potential impacts of new development areas. This will ensure that appropriate mitigation is provided to assuage any concerns by Historic England.
- Sensitive design techniques (in addition to those which are included in Policy HO2 at the moment) could include:
 - Inclusion of high quality and (where possible) locally sourced materials and detailing that contribute positively to the setting of nearby heritage assets and reflect local building traditions.
 - Retention of traditional heritage features through the design of new development areas.
 - Special attention could be given to the design, colour, materials and detailing of new housing.
 - Proposals could reflect the distinctive and historical architectural style and design traditions established in the Neighbourhood Plan area, integrating with the historic topography, settlement form, historic street patterns and street lines.
- For areas of land which have been identified for their archaeological importance, new development proposals could undertake archaeological evaluations prior to construction, with any findings appropriately reported and documented on the local historic environment record in line with best practice guidance.

5.4 Alongside the Regulation 14 responses, these recommendations were subsequently considered by plan makers during updates to the ANP.

Approach to this appraisal

- 5.5 The appraisal of the submission version of the ANP is presented below and is structured under the five SEA Themes.
- 5.6 For each SEA Theme, 'significant effects' of the submission version of the ANP on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment, as appropriate.
- 5.7 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the ANP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Air Quality

- 5.8 Increased population levels and economic and employment growth in Medway have led to an increased demand for travel that is impacting on traffic levels within the area, particularly on the approaches to the key local centres (including Chatham Town Centre). Increases in traffic flows have led to an emerging pattern of congestion on key corridors, with increasing delays and journey times. These issues have contributed to the designation of four Air Quality Management Areas (AQMAs) in Medway. This includes the Central Medway AQMA which passes through the ANP area and has observed increases in the annual mean concentration objective of $40 \mu\text{g m}^{-3}$ for nitrogen dioxide (NO_2).
- 5.9 With reference to the proposed site allocations (and more widely applied to all development proposals which may come forward during the plan period), Policy ST1 (Air Quality) identifies the importance of delivering measures which seek to improve air quality in the ANP area. Measures listed in the policy include (but is not limited to) the addition of natural buffers within the design of schemes, such as native tree planting and street-level green planting to absorb pollution, and the use of low emission vehicles during construction. Policy ST1 also stipulates that proposals should be accompanied by emissions mitigation assessments to show how they will contribute to local air quality improvements.
- 5.10 One of the main aims of the ANP is to create a car-lite neighbourhood in which residents reclaim the streets for walking, cycling, playing, and shopping. This will also have indirect and positive benefits to air quality through aiming to reduce the reliance on private vehicles and encourage the transition to low-traffic and healthier neighbourhoods. Key policies in this respect include Policy ST2 (Safe Routes for Pedestrians), Policy ST3 (Humanising Luton Road) and Policy ST5 (Active Transport).
- 5.11 More broadly, the provision of enhanced green infrastructure is recognised as an important element of the solution to addressing air pollution in built up areas,

including through removing different types of air pollution (i.e. particulate matter, sulphur dioxide, nitrogen dioxide and ozone). Biodiversity net gain can also deliver air quality benefits at the microscale. Key policies in this respect includes Policy HO2 (Beautiful Design), Policy HO6 (Outdoor Space), Policy BNE1 (Public Realm Enhancements), Policy BNE3 (Open Spaces) and Policy BNE4 (Street Trees), with proposals expected to incorporate resilient green infrastructure and boost biodiversity. The provisions of these policies will also facilitate increased absorption and dissipation of NO₂ and other pollutants. This will positively contribute to one of the key objectives of Medway's Air Quality Action Plan (AQAP) which is to reduce levels of pollution within the AQMAs to below objective levels and improve air quality more widely.

Biodiversity

- 5.12 To ensure the European Directives were operable in the UK after the end of the EU transition period, changes were made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. In this respect, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) in the UK no longer form part of the EU Natura 2000 ecological network. Instead, the 2019 Regulations propose the creation of a national site network within the UK territory⁷. The network comprises the designated sites already designated under the Nature Directives (i.e. 79/409/EEC and 92/43/EEC), along with any additional sites which are designated under the 2019 Regulations. The national site network continues to operate in parallel with other designations and contributes towards the UK's international commitments for protected areas.
- 5.13 With reference to the ANP proposals (including the proposed site allocations through Policy HO4), correspondence from Medway Council and Natural England⁸ in April 2021 advised that the ANP proposals have the potential to adversely impact the integrity of national site network sites within proximity to the ANP area, particularly through increased recreational disturbances. This includes the Medway Estuary and Marshes SPA (and Ramsar), North Kent Marshes SPA (and Ramsar), Thames Estuary and Marshes SPA (and Ramsar), and The Swale SPA (and Ramsar). In this respect, the ANP is accompanied by a Habitats Regulation Assessment (HRA)⁹ which considers the impact pathways and any likely significant effects associated with the ANP proposals.
- 5.14 In the context of the above, the HRA states that increased development within the ANP area could lead to higher numbers of visitors to national site network sites. This has the potential to put increased pressure on the disturbance of birds at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the populations. In this respect, the HRA recommends that the Neighbourhood Plan includes an additional protective policy within its 'Built and Natural Environment' chapter. Specifically:
- 5.15 *"Policy BNE5 (Protection of Internationally Designated Sites): To ensure that recreational pressure effects on sites designated for overwintering and breeding birds are appropriately mitigated, residential development in the 6km and 6-10km core recreational catchment zones will need to contribute to the*

⁷ DEFRA (2021): Policy Paper: Changes to the Habitats Regulations 2017', [online] available to access via [this link](#)

⁸ Medway Council (April 2021): The Arches Neighbourhood Plan SEA and HRA Screening Report, report provided by the Neighbourhood Forum, contributing to the evidence base for the ANP.

⁹ AECOM (July 2021): 'HRA for the Arches Neighbourhood Plan', report prepared on behalf of the Neighbourhood Forum, contributing to the evidence base for the ANP.

recreation mitigation strategy emerging for the North Kent SPA and Ramsar. All residential developments within 6km and larger developments (comprising 100+ dwellings) within 6-10km will need to contribute an agreed per-dwelling tariff towards Strategic Access Management and Monitoring in the European sites. Furthermore, larger developments are required to demonstrate the availability of or provide for alternative greenspace / blue space to help absorb recreation pressure locally.'

- 5.16 Providing the additional protective policy is included within the ANP, the HRA concludes that the likely significant effects on the integrity of national site network sites from recreational disturbances can be excluded.
- 5.17 Whilst the proposed site allocations within Policy HO4 overlap with SSSI Impact Risk Zones (IRZ) for the types of development likely to come forward during the plan period, the total amount of development to be brought forward (based on the indicative capacities listed within the 'Site Allocations' section of the ANP) is not likely to exceed the IRZ thresholds, specifically:
- Residential development of 500 units or more.
 - Any residential development of 500 or more houses outside existing settlements/urban areas.
- 5.18 Nonetheless, one of the key objectives within the ANP is to respect and enhance the natural environment. This is recognised and acknowledged within several policies which will 1) help limit potential effects on features and areas of ecological interest and 2) support the resilience of green and blue infrastructure networks. This is further discussed below.
- 5.19 Published in July 2021, paragraph 174 (d) within the revised NPPF¹⁰ states that planning policies and decisions should contribute to and enhance the natural and local environment by '*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks*', with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan¹¹ (which was published in January 2018) and the Environment Act¹² (which received Royal Assent in November 2021). In this regard, Policy HO2 (Beautiful Design) and Policy BNE3 (Open Spaces) states that new developments should deliver net gains, with Policy BNE1 (Public Realm Enhancement) and Policy BNE4 (Street Trees) encouraging new developments to increase the frequency and quality of greenery in the area.
- 5.20 The nature, scale, timing, and duration of some development activities can result in the disturbance of protected species. This can include effects of poor air quality on designated sites, and severance of ecological networks from new development areas. In this respect, the ANP also sets out a range of provisions which will support and enhance habitats, species, and ecological networks.

¹⁰ DLUHC (2018): 'Revised National Planning Policy Framework', [online] available to access via [this link](#)

¹¹ DEFRA (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via [this link](#)

¹² GOV.UK (2021): 'Environment Act', [online] available to access via [this link](#)

- 5.21 For example, Policy CS4 is supportive of proposals to supplement and enhance existing green spaces with native trees and natural vegetation. Additionally, Policy BNE1 and Policy CS4 seek to improve green corridors within the ANP area and embrace opportunities for nature conservation. Specifically, this includes through enhancing connectivity through the creation of linear parks and ecological corridors to maximise the positive outcomes for wildlife and the local community. These provisions will safeguard and enhance areas which are likely to provide roosting and foraging sites for protected species, maintaining linkages between habitats and reducing fragmentation.
- 5.22 Overall, Neighbourhood Plan policies should ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals which come forward during the plan period, whilst also delivering net gains.

Climate Change

- 5.23 The UK Government has outlined a commitment to secure a ‘green recovery’ from the COVID-19 pandemic. Reflecting the conclusions of the Institute for Government’s ‘Net Zero’ report¹³, a green recovery is only likely to happen if net zero becomes a core part of the Government’s thinking and its economic policy. Within the report, net zero is described as *“decarbonising not just the power sector but much more difficult sectors including transport, housing and agriculture, where progress has long been stalled and the UK is off track”*. In this respect, policies, and proposals within the ANP seek to reduce the reliance on fossil fuels and support the introduction of low carbon technologies. A key policy in this regard is Policy HO2 (Beautiful Design) which encourages carbon neutrality through the design of new residential developments. In terms of tackling the climate crisis, this will help to positively contribute to Medway Council’s ‘net zero’ carbon ambitions¹⁴.
- 5.24 Policy ST4 (Parking) within the ANP also encourages the use of electric vehicles (EV), with an objective to ensure that new developments cater for growths in EV uptake. However, a reduction in transport carbon emissions cannot solely rely on the switch to EV alone, particularly given that for many residents, an electric car will remain unaffordable. In this regard, the ANP also outlines several proposals which seek to further reduce the reliance on fossil fuels. Such proposals include delivering more active travel infrastructure, encouraging a healthy-streets approach to the design of new development areas by enhancing opportunities for walking and cycling, and improving public transport options. Key policies in this respect include Policy BNE1 (Public Realm Enhancements) and Policies ST1 – 5. This will positively contribute to climate change mitigation efforts by encouraging the use of sustainable transport options and active travel.
- 5.25 With reference to the proposed site allocations through Policy HO4, Site 6 ‘Union Place’ is partially within Flood Zone 2 and/or Flood Zone 3. Additionally, the following site allocations are adjacent to areas of land within Flood Zone 2 and/or 3: Site 1 ‘Former Go Outdoors (The Brook)’, Site 2 ‘97-99 The Brook’ and Site 7 ‘The Brook and King Street Land’. The remaining five site

¹³ Institute for Government (2020): ‘Net zero: how government can meet its climate change target’. [online] available to access via [this link](#)

¹⁴ Medway Council (2021): ‘Medway Climate Change Action Plan’, [online] accessible via [this link](#)

allocations are all within Flood Zone 1 and have a low fluvial flood risk. It is useful to note that all the proposed site allocations comprise existing areas brownfield land (i.e. comprising largely non-permeable materials). In this respect, redevelopment and regeneration at these locations has the potential to incorporate adaptation measures through design. This is recognised through Policy BNE1 and Policy ST3 (Humanising Luton Road) which encourages the use of permeable materials and natural features through design (including appropriate drainage solutions) to address any flood risk concerns and increase local resilience to climate change impacts. It is also anticipated that the provisions of the NPPF and Local Plan policy will help to guide development away from the areas at highest risk of flooding.

- 5.26 Additionally, the protection of open spaces and habitats within the ANP area through the provisions of Policy HO6 (Outdoor Space), Policy BNE1, Policy BNE2 (Local Green Spaces), Policy BNE3 (Open Spaces) and Policy BNE4 (Street Trees) will safeguard natural carbon sequestrators located within the townscape (i.e. trees and hedgerows). These policy provisions will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and shelter, reducing the urban heat island effect, and reducing surface water run-off issues.

Historic Environment and Townscape

- 5.27 The ANP area has a rich historic environment, recognised through the diversity of features and areas that are nationally and locally valued for their heritage interest. With reference to the proposed site allocations through Policy HO4 and discussed within the 'Site Allocations' section of the ANP (see pages 38 to 47), the key heritage constraints and considerations for development proposals are identified as follows:

- **Site 1: Former Go Outdoors (The Brook), Site 2: 97-99 The Brook, Site 6: Union Place and Site 7: The Brook and King Street Land** are within the setting of the Brompton Lines Conservation Area, Brompton Lines Scheduled Monument, and the Grade I listed Naval War Memorial. The ANP acknowledges that new development at these locations should (amongst other considerations) *“enhance the significance of the memorial through appropriate signage and consideration of sight lines, site layout, building design and landscaping.”*
- Although the Grade II listed 'Chatham Ragged School' is located within 50m of **Site 2: 97-99 The Brook** (on the opposite side of Rope Walk), this nationally designated heritage asset is relatively screened from view by the surrounding buildings and the flat topography at this location.
- **Site 3: Arches View** is within an approximate 50m distance from the Grade II listed 'Thorney Lodge'. Development at this location is not likely to impact upon the setting of this nationally designated heritage asset given the screening provided by 1) the surrounding buildings along High Street on approach to the roundabout and 2) the height of the Luton Arches railway bridge which provides a visual separation between High Street, Chatham Hill and Luton Road.
- **Site 4: Bright Road and Site 5: Dagmar Road** are not located within or within the setting of any designated heritage assets.

- **Site 7: The Brook and King Street Land** is located approximately 25m to the north of ‘The Brook Low Level Pumping Station’ Scheduled Monument.
- **Site 3: Arches View, Site 8: 393 High Street** and **Site 9: Pembroke Court Car Park** are relatively small sites located along High Street. Although the sites are within proximity to the Brompton Lines Conservation Area, views of the sites from within this designated area are likely to be restricted by the surrounding buildings along High Street, Hardstown, Carpeaux Close, Institute Road, and Meadowbank Road. Additionally, all three sites are currently underutilised brownfield areas as shown below in Figure 5.1. In this respect, regeneration at these locations is likely to positively impact the built environment and character (indirectly benefiting the setting of any nearby heritage assets).



Figure 5.1: Underutilised brownfield site allocations located along High Street¹⁵

5.28 It is important to recognise that all the proposed site allocations through Policy HO4 are brownfield sites within the existing built-up area. Whilst the regeneration and redevelopment of these sites has the potential to impact upon the setting of heritage assets (particularly views from the Naval War Memorial, Brompton Lines Conservation Area, and Brompton Lines Scheduled Monument), in all cases the existing uses (or condition) of the sites detract from the overall character of the views which are experienced from these locations (which look across a relatively urbanised town centre environment).

5.29 The scale of existing developments has also been a large influence on key heritage assets. This is reflected in Historic England’s SEA scoping response, which states that “*some past developments in the town centre have resulted in harm to these views both from the memorial and the wider viewing area of the Great lines Heritage Park through their poor architectural quality and dominating sled-style massing*”. Additionally, Historic England note that the setting of ‘The Brook Low Level Pumping Station’ Scheduled Monument (which

¹⁵ The images of the sites have been taken from the ‘Street View’ tool on Google Maps

is located adjacent to the north western boundary of the ANP area) *“has been harmed by the construction of very large structures in its surroundings that reduce its visibility and provide a poor quality of urban environment reducing its appreciation”*.

- 5.30 These sensitivities and issues are closely reflected by the ANP policies and proposals, which have a strong focus on the conservation and enhancement of both designated and non-designated heritage assets, and their settings.
- 5.31 For example, Policy HO7 (Historic Environment) requires all new developments to conduct a thorough analysis into the potential impact to heritage assets, avoiding harm to both designated and non-designated heritage assets of key importance within the community. The key considerations for the site allocations (as presented in pages 38 to 47 within ANP) also highlight that *“the impacts to non-designated heritage assets should be assessed...to ensure that site allocations do not encourage the loss of sites of archaeological interest”*. Additionally, policies which support the principle of walkable neighbourhoods and healthy streets (including Policies BNE1, ST2, ST3 and ST5) have the potential to facilitate pedestrian accessibility to heritage assets and areas, which in turn can enhance the understanding and appreciation of their special qualities. Another key element is the underpinning of the Neighbourhood Plan by the Design Guide. Given the Design Guide sets out a comprehensive range of provisions relating to the historic environment, this will help provide an appropriate basis for the conservation and enhancement of the historic environment surrounding the proposed site allocations.
- 5.32 Townscape character plays an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Townscape character, which is itself underpinned by the historic environment, can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. The quality and diversity of architecture in Chatham is a defining feature and contributes strongly to the Neighbourhood Plan area’s sense of place and quality of its environment. In this context, proposals within the ANP have a strong focus on protecting the sense of place and special qualities which contribute to its character.
- 5.33 With reference to the proposed site allocations through Policy HO4, the ANP seeks to encourage developments which complement and enhance the character of the surrounding townscape. Specifically, proposals shall be expected to have regard to the key design considerations within the ‘Site Allocations’ section of the ANP and the Design Code which accompanies the ANP. More broadly, Policy HO2 (Beautiful Design) requires new residential development to complement, enhance and positively contribute to local character and identity, including in relation to their scale and appearance. It is anticipated that these provisions will facilitate opportunities for high quality design and layout to be incorporated within new developments, positively contributing to the sense of place and local distinctiveness of the ANP area.
- 5.34 Enhanced habitats (trees, hedgerows, grass, shrub, etc.,) can form important parts of townscape character, enhancing the street scene and providing screening to restrict undesirable views. More broadly, delivering net gains in biodiversity and facilitating green infrastructure enhancements can also have beneficial impacts in terms of the built environment, and by extension, the

setting of the historic environment. Key policies in this regard include Policy HO2 (Beautiful Design), Policy HO6 (Outdoor Space), Policy BNE1 (Public Realm Enhancements) and Policy BNE4 (Street Trees), and are discussed in further detail within the 'Air Quality', 'Biodiversity', and 'Climate Change' appraisal sections presented above.

5.35 In this respect, the ANP, through its close focus on high quality and sensitive design and public realm improvements, and through its close recognition of the historic environment's key role in underpinning these improvements, will support significant enhancements to the townscape character and the fabric and setting of the historic environment in the Neighbourhood Plan area.

Community Wellbeing

5.36 The Neighbourhood Plan put forward a range of policies which seek to support and enhance residents' quality of life in the Neighbourhood Plan area.

5.37 The housing policies of the ANP set out provisions which aim to address the key issues associated with housing in the Neighbourhood Plan area. These issues include: a lack of affordable homes and an increase in rental costs; an overconcentration of Houses of Multiple Occupancy (HMOs) of poor quality; a decrease in the supply of family homes due to conversions into flats and temporary or emergency accommodation; and the delivery of low-quality homes through permitted development rights.

5.38 In this respect HO1 (Affordable Housing) seeks to ensure that at least 25% of all dwellings in new developments of 15 homes or more are 'genuinely affordable', with a tenure mix of 60% affordable and 40% intermediate affordable housing to be taken forward, and to be available in perpetuity. Affordable housing should be integrated with market housing, and such provision should meet Building Regulations Standard M4(2) Accessible and Adaptable Dwellings. Policy HO3 (Family Housing) seeks to limit the loss of family housing in the Neighbourhood Plan area, with additional support for the conversion of existing homes into family housing. The quality of residential environments will also be supported by: Policy HO2, which seeks to embed high quality design in residential development (including through the application of the Design Code); Policy HO5 (HMOs), which sets out space standards for HMOs, and seeks to limit the number of HMOs in smaller areas; and Policy HO6, which seeks to deliver appropriate levels of high quality open space alongside new development.

5.39 Accessibility to services and facilities is a key influence on the quality of life of residents and social inclusion. In this regard all of the locations for development are within good proximity to the local services, facilities and public transport networks available in the town centre. Accessibility will be further supported by Policy E2 (Mixed Use Development), which seeks to ensure that new development incorporates a mix of uses where possible, and are within a 15-minute walk of their daily needs, such as grocery stores, banks and leisure space. The policies' focus on community provision will also support accessibility. This includes Policy CS1 (Safeguarding Existing Social Infrastructure), which identifies in the region of 15 sites and buildings for community uses, and seeks to preclude their loss as community spaces, and Policies CS2 to CS4, which seek to enhance existing community provision such as sports and recreational facilities and green spaces. These provisions will be

supported by the Neighbourhood Plan's Community Action Plan, which sets out wider community aspirations that go beyond the planning system but are considered important to the future of Luton Road and the local area.

- 5.40 Accessibility to services and facilities will also be supported by the Sustainable Transport policies (Policies ST1 to ST5). These seek to ensure that new developments and street improvements encourage walking, active transport, and the reduction of car dependency (Policy ST1), deliver safe pedestrian and cycle networks (ST2), deliver enhancements to Luton Road which supports the corridor's use by vulnerable road users (ST3), manage car parking (ST4) and encourage active travel provision (ST5). These provisions will be supported by the Built & Natural Environment policies (Policies BNE1-4) and the implementation of the Design Guide, which will help deliver high quality neighbourhoods which help overcome the barriers to active travel and sustainable transport use, including for vulnerable road users. In addition to supporting accessibility, these provisions will support residents' physical and mental health and wellbeing by promoting active modes of travel, supporting enhancements to air and noise quality, and the improving the quality of neighbourhoods as places to live and work.
- 5.41 The policies discussed above will also support the economic and social vitality of the Neighbourhood Plan area. This will be further reinforced by Policy E1 (Encouraging New Business), which provides support for appropriate new local employment provision, for repurposing existing unused retail space for small businesses, start-ups, and community organisations, and for using planning obligations to secure affordable workspaces at rents below the market rate for a specific social, cultural, or economic development purposes. The policy also seeks to ensure that larger developments provide 10% of their floorspace as affordable workspace for social value enterprises (charities, voluntary and community organisations, or social enterprises), cultural value enterprises (creative and artists' workspace, rehearsal and performance spaces, and makerspaces) and/or disadvantaged groups starting up in any sector. These provisions will support the economic vitality of the area through facilitating the conditions for encouraging start-ups, SMEs, and social enterprises, and for enabling a diverse economic offer to further develop in the area.
- 5.42 The benefits for residents' quality of life outlined above will be supported by the planning provisions presented for the nine identified priority sites for development. These set out a range of site-specific considerations which will support the liveability of neighbourhoods, accessibility, and community vitality.
- 5.43 Overall, therefore, the Neighbourhood Plan has the potential to have significant positive effects in relation to the Community Wellbeing SEA theme. This relates to the ANP's focus on delivering housing which meets local needs, maximising accessibility to services, facilities, and opportunities, promoting health and wellbeing and supporting community and economic vitality and social inclusion.

Conclusions at this current stage

- 5.44 The assessment has concluded that the submission version of the ANP is likely to bring significant positive effects in relation to the Historic Environment and Townscape SEA Theme. These benefits largely relate to the ANP's emphasis on protecting and enhancing townscape character (and features), delivering high-quality design which respects and enhances local distinctiveness and the

built environment, facilitating improvements to quality of the public realm, encouraging high-quality design which is informed by a thorough analysis into the potential impact to heritage assets, and increasing awareness, understanding and appreciation of the historic environment. Given the Design Guide accompanying and underpinning the ANP also sets out a comprehensive range of provisions relating to the built environment, this will help provide an appropriate basis for the conservation and enhancement of the heritage assets and townscape features located within the setting of the proposed site allocations.

- 5.45 The Neighbourhood Plan also has the potential to have significant positive effects in relation to the Community Wellbeing SEA theme. This relates to the ANP's focus on delivering housing which meets local needs, maximising accessibility to services, facilities, and opportunities, promoting health and wellbeing and supporting community and economic vitality and social inclusion.
- 5.46 Additionally, the ANP will bring positive effects in relation to the Biodiversity SEA Theme by supporting net gains for biodiversity within new development proposals, enhancing ecological networks through green infrastructure enhancements (including through supporting proposals which deliver linear parks and ecological corridors), and improving ecological resilience.
- 5.47 Regarding the Climate Change SEA Theme, the ANP will potentially lead to positive effects through supporting proposals which deliver energy efficient designs and layouts, proactively respond to the potential impacts of climate change (e.g. the urban heat island effect, and flood risk concerns from increased storms / rainfall events), and by encouraging active and sustainable travel within the ANP area. However, this is dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.
- 5.48 The ANP will also initiate several beneficial approaches regarding the 'Air Quality' SEA Theme, given its focus on enhancing the active travel network (including public rights of way and cycle routes), supporting healthy streets and low-traffic neighbourhoods, and encouraging a greater use of sustainable modes of transportation in the medium-to-long-term.

6. What are the next steps?

- 6.1 The SEA Environmental Report accompanies the submission version of the ANP to the responsible authority, Medway Council, for Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.3 If the Independent Examination is favourable, the ANP will be subject to a referendum, organised by Medway Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the ANP will become part of the development plan for the ANP area.

Appendix A Context Review and Baseline

A.1 Air Quality

This theme focuses on air pollution, in particular; air quality exceedances (including associated with Air Quality Management Areas) and air quality issues associated with the main road network.

Policy Context

Table A1.1 (below) presents the most relevant documents identified in the policy review for the purposes of The Arches Neighbourhood Plan SEA.

Table A1.1: Plans, policies, and strategies reviewed in relation to air quality

Document Title	Year of publication
<u>National Planning Policy Framework (NPPF)</u>	2021
<u>The Clean Air Strategy</u>	2019
<u>UK plan for tackling roadside nitrogen dioxide concentrations</u>	2017
<u>A Green Future: Our 25 Year Plan to Improve the Environment</u>	2018
<u>Adopted Medway Local Plan (MLP)</u>	2003
<u>Emerging Medway Local Plan (2019- 2037) (EMLP)</u>	Emerging Local Plan
<u>Medway Air Quality Action Plan (AQAP)</u>	2015

The key messages emerging from the review are summarised below:

- The ANP will be required to be in general conformity with the NPPF, which predominantly seeks early planning to reduce/ mitigate air quality impacts in development and to take advantage of opportunities to improve air quality. Measures to improve air quality include traffic and travel management and green infrastructure provision. Strategic development is expected to be focused in locations that have or will be provided with high levels of accessibility; supporting both a reduced need to travel and offering a genuine choice of transport modes. Smaller-scale development should consider the potential for cumulative effects in relation to air quality.
- To improve air quality across the UK, national strategies have, in the last few decades, focused on regulatory frameworks, investment by industry in cleaner processes and a shift in the fuel mix towards cleaner forms of energy (largely at point sources). Whilst there are dedicated strategies to reducing roadside emissions (as a significant source of nitrogen dioxide emissions), recent objectives outlined in the Clean Air Strategy seek to recognise wider sources (including smaller contributors and diffuse sources) that contribute to poor air quality. These include power

generation, heating homes, producing food, manufacturing consumer goods, and powering transport.

- The ANP will also be required to be in general conformity with the adopted Local Plan which contains policies relating to air quality, alongside the policies of the emerging Local Plan.
- Air Quality Management Areas (AQMAs) are declared in areas which exceed national objectives for levels of particulates, nitrogen dioxide, sulphur dioxide, ozone, benzene, polycyclic aromatic hydrocarbons, butadiene, carbon monoxide, lead and/ or nitrogen oxides. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.
- There are four AQMAs in Medway as of 2021. Subsequently, Medway Council's Air Quality Action Plan (AQAP) has identified measures to improve air quality and improve the lives of those living within AQMAs as well as the wider population.
- The Medway Air Quality Communications Strategy is intended to support the goals of the AQAP by increasing awareness regarding the health impacts of air pollution in Medway.

Current Baseline

The main source of air pollution in Medway is road traffic emissions from major roads, notably the A2, which runs through the centre of the Plan area. Other pollution sources, including commercial, industrial, and domestic sources, also contribute to background pollution concentrations.¹⁶

Parts of the Central Medway AQMA are located within the Plan area, shown in **Figure A1.1**, below. The AQMA covers three routes which pass through the Neighbourhood Plan: Chatham Hill/the A2, the High Street and Luton Road.

The Central Medway AQMA was listed in 2010. Since its declaration, pollutant levels in the AQMA has decreased by $10.1 \mu\text{g.m}^{-3}$.

Of the twelve sites at which an exceedance of NO_2 (greater than $40 \mu\text{g.m}^{-3}$) was measured in 2019, seven sites are located adjacent to roads covered by Central Medway AQMA. Of the seven exceeding sites located adjacent to Central Medway AQMA, four have experienced increases in annual mean concentrations (1.9, 2.9, 2.5 and $3.9 \mu\text{g/m}^3$ change respectively) between 2018 and 2019. Those in the Plan area (shown in **Figure A1.2**, below) are:

- DT18 (Lamp post adjacent 4b Luton Road (Luton Arches junction))
- DT28 (Lamp post NDL49 adjacent 9 New Road, Chatham)

As of 2019, there are no exceedances for particulate matter (PM_{10}) for monitoring areas in the Plan area. Concentrations of PM_{10} and $\text{PM}_{2.5}$ decreased when compared with 2018 concentrations. Concentrations of sulphur dioxide (SO_2) were also below necessary thresholds as per the ASR.

¹⁶ Medway Council (2021): 'Air Quality Annual Status Report', [online] available to access via [this link](#)

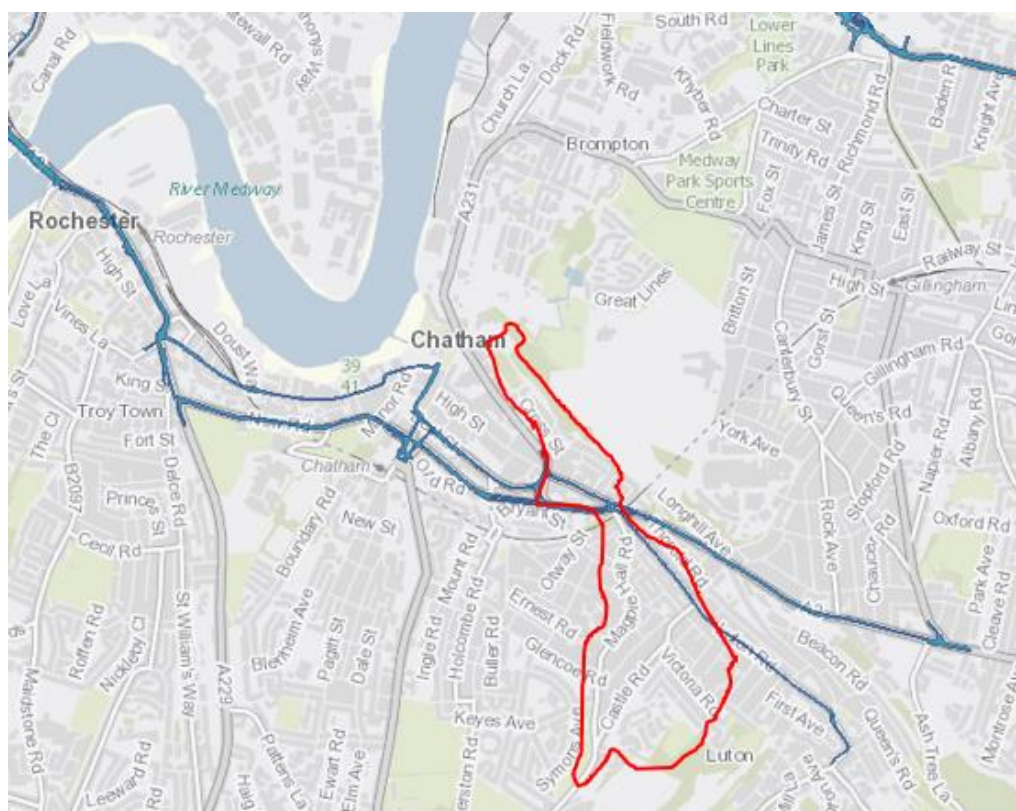


Figure A1.1: Central Medway AQMA (ANP area shown in red)¹⁷



Figure A1.2: NO₂ Monitoring sites in Medway

¹⁷ UK Air (2010): 'Central Medway AQMA' [online] available to access via [this link](#)

Future Baseline

Development has the potential to impact on air quality in the Plan area through increasing traffic flows and associated levels of pollutants such as NO₂, particularly along major roads (including the A2), which are more susceptible to rising emissions from increased private vehicle use from future development.

However, Medway Council will seek to manage local air quality through the implementation of the Medway Air Quality Action Plan (AQAP) and supporting Medway Air Quality Communications Strategy. Medway Council is also working with Public Health colleagues to prioritise action on air quality in its area to help reduce the health burden from air pollution, which will alleviate the impact of future development on air pollution. Similarly, an increase in electric car use has the potential to decrease emissions of key pollutants from transport in the Plan area, with possible benefits for air quality.

A.2 Biodiversity

This theme focuses on nature conservation designations, habitats, and species within and surrounding The Arches Neighbourhood Plan area.

Policy Context

Table A2.1 (below) presents the most relevant documents identified in the policy review for the purposes of The Arches Neighbourhood Plan SEA.

Table A2.1: Plans, policies, and strategies reviewed in relation to biodiversity

Document Title	Year of publication
National Planning Policy Framework (NPPF)	2021
The 25 Year Environment Plan	2018
Biodiversity 2020 Strategy	2011
Environment Act	2021
UK Biodiversity Action Plan	2007
The Natural Environment and Rural Communities Act	2006
Kent Biodiversity Action Plan	1997
Kent Nature Partnership Biodiversity Strategy (2020-2045)	2020
Adopted Medway Local Plan (MLP)	2003
Emerging Medway Local Plan (2019- 2037) (EMLP)	Emerging Local Plan

The key messages emerging from the review are summarised below:

- The ANP will be required to be in general conformity with the NPPF, which provides significant emphasis on improving biodiversity and securing measurable net gains in development, alongside protection and conservation of designated sites and important species and habitats. This includes utilising a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or

landscape scale. Support is given to establishing coherent ecological networks that are more resilient to current and future pressures, particularly in consideration of climate change.

- Over the past decade policy (e.g. The Natural Environment White Paper and Biodiversity 2020) has demonstrated a move away from the traditional approach of protecting biodiversity, to a wider landscape approach to enhancing biodiversity, as part of the overall aims to halt biodiversity loss.
- The 25 Year Environment Plan places emphasis on improvements to the natural environment; identifying the need to “*replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats.*” Working at a landscape scale transformation is expected to connect habitats into larger corridors for wildlife.
- The Environment Act provides further provisions in relation to biodiversity when granted royal assent. The Act sets parameters for biodiversity gain as a condition of planning permission, as well as biodiversity gain site registers and biodiversity credits. The Act also identifies a general duty to conserve and enhance biodiversity, including through biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Furthermore, habitat maps are expected to include recovery and enhancement areas which are (or have the potential to become) important for biodiversity.
- The Kent Biodiversity Action Plan and Nature Partnership Biodiversity Strategy provide guidance to enable the conservation and enhancement of biodiversity in the County.
- The ANP will also be required to be in general conformity with the adopted local plan which contains policies directly relating to biodiversity and geodiversity, and emerging policies in the emerging local plan.

Current Baseline

Designated Sites

There are no internationally designated sites within the Plan area. However, Medway Estuary & Marshes Ramsar site is situated 1.9km from the northern boundary of the Plan area, and wildlife within the site could be influenced by future development in the Medway area. The Ramsar site is a complex of rain-fed, brackish, floodplain grazing marsh with ditches and intertidal marsh and mudflat. It is of international importance for its diverse assemblage of wetland plants and invertebrates (12 British Red Data Book species). Over the winter, it provides habitat for *Tringa totanus* (2.1% of the population), *Pluvialis squatarola* (2% of the population), and *Calidris alpina alpina* (1.9% of the population). The area is also used for recreation, fishing, grazing, and hunting.¹⁸

⁴ Ramsar Sites Information Service (1999): 'Medway Estuary & Marshes' [online] available via [this link](#)

Medway Estuary & Marshes is also designated as an Special Protection Area (SPA). The SPA designation highlights a number of qualifying species¹⁹ within the site, including:

- *Branta bernicla bernicla*; Dark-bellied brent goose
- *Tadorna tadorna*; Common shelduck
- *Anas acuta*; Northern pintail
- *Recurvirostra avosetta*; Pied avocet
- *Recurvirostra avosetta*; Pied avocet
- *Charadrius hiaticula*; Ringed plover
- *Pluvialis squatarola*; Grey plover

Medway Estuary and Marshes is also designated as a Site of Special Scientific Interest (SSSI). In addition to the habitats already described, the site includes smaller areas of scrub, reedbeds and sand dune which add to the variety of interest. 45.6% of the site is in an 'unfavourable-declining' condition.²⁰

Priority Habitats and Species

The River Medway is an important ecological feature which is located close to the north of the Plan area. The river supports many important species including arable wildflowers, orchids, dormouse, water vole, adder, great crested newt, breeding waders and other bird species.²¹

There are a number of small areas of deciduous and broadleaved woodland in the Plan area, particularly in the north at Town Hall Gardens Park.

Future Baseline

Habitats and species will potentially face increasing pressures from future development within the area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be important to effectively coordinate the delivery of housing, employment, and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised both within the Neighbourhood Plan area and in the surrounding areas.

¹⁹ Natural England (2014): 'European Site Conservation Objectives for Medway Estuary & Marshes SPA' [online] available via [this link](#)

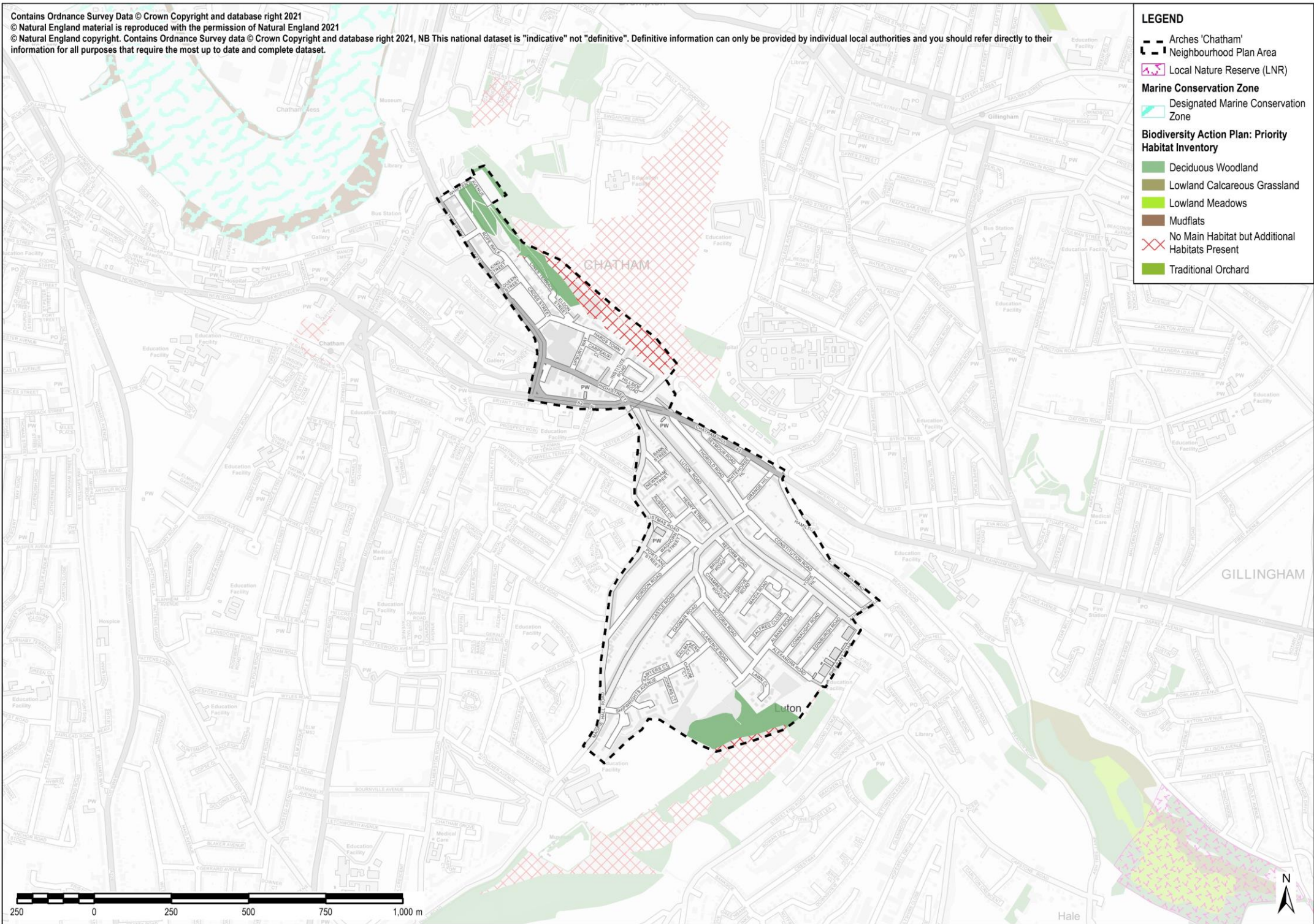
²⁰ Natural England (2021): 'Medway Estuary and Marshes SSSI' [online] available at [this link](#)

²¹ Explore Kent (n.d.): 'Rivers and riverside land in the Kent Downs landscape' [online] available at [this link](#)

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LEGEND

-  Arches 'Chatham'
-  Neighbourhood Plan Area
-  Local Nature Reserve (LNR)
- Marine Conservation Zone**
-  Designated Marine Conservation Zone
- Biodiversity Action Plan: Priority Habitat Inventory**
-  Deciduous Woodland
-  Lowland Calcareous Grassland
-  Lowland Meadows
-  Mudflats
-  No Main Habitat but Additional Habitats Present
-  Traditional Orchard



A.3 Climate Change

This theme focuses on existing and future flood risk and the wider impacts of climate change, activities which contribute to climate change, and measures to mitigate the effects of climate change and increase resilience.

Policy Context

Table A3.1 below presents the most relevant documents identified in the policy review for the purposes of The Arches Neighbourhood Plan SEA.

Table A3.1: Plans, policies, and strategies reviewed in relation to climate change

Document Title	Year of publication
<u>National Planning Policy Framework (NPPF)</u>	2021
<u>UK Climate Change Act</u>	2008
<u>UK (second) National Adaptation Programme 2018 to 2023</u>	2018
<u>The Clean Air Strategy</u>	2019
<u>Clean Growth Strategy</u>	2019
<u>UK Sixth Carbon Budget</u>	2020
<u>25-Year Environment Plan</u>	2019
<u>National Infrastructure Assessment</u>	2018
<u>UK Climate Change Risk Assessment</u>	2017
<u>Flood and Water Management Act</u>	2010
<u>National Flood and Coastal Erosion Risk Management Strategy</u>	2020
<u>How Local Authorities Can Reduce Emissions and Manage Climate Change Risk</u>	2012
<u>The National Design Guide</u>	2021
<u>Heat Networks: Building a Market Framework</u>	2020
<u>Summary of Climate Change Risks for England Report</u>	2017
<u>Interim Climate Change Planning Policy</u>	2021
<u>Kent and Medway Energy and Low Emissions Strategy</u>	2020
<u>Medway Climate Change Action Plan (2021)</u>	2021
<u>Adopted Medway Local Plan (MLP)</u>	2003
<u>Emerging Medway Local Plan (2019- 2037) (EMLP)</u>	Emerging Local Plan

The key messages emerging from the review are summarised below:

- The ANP will be required to be in general conformity with the NPPF, which requires proactive planning to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that contribute to radical reductions in greenhouse gas emissions, and deliver long-term resilience, including through reuse, regeneration, and conversion.
- The Clean Growth Strategy, Clean Air Strategy and the 25-year Environment Plan are a suite of documents which seek to progress the government's commitment under the UK Climate Change Act to becoming net zero by 2050. The documents set out detailed proposals on how the government will tackle all sources of air pollution, whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25-year Environment Plan, which further seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents also interlink with the government's commitment to decarbonising transport, a recognised challenge that needs more work in a timely manner if government are to achieve net zero targets. Furthermore, the decarbonisation plan recognises the twinned need to undertake action to adapt the transport sector and increase resilience to climate change risks; and this challenge is more directly addressed through the UK's National Adaptation Programme.
- The ANP will also be required to be in general conformity with the adopted local plan which contains policies relating to climate change mitigation and adaptation, including flood risk, green infrastructure (GI) development, resource efficiency, air quality, water quality, sustainable transport and accessibility. The ANP will also need to acknowledge the emerging policies in the emerging local plan.

Current Baseline

Contribution to Climate Change

Medway Council declared a climate change emergency in April 2019. Following this, the Council have formulated a Climate Change Action Plan (2021) which will be used to guide decision making alongside the emerging Local Plan.²²

CO₂ emissions from the built environment are monitored and recorded at Local Authority level.²³ **Figure A3.1** below shows that emissions per km²/t for Medway are lower than emissions for the South East of England and England as a whole. Emissions in Medway have decreased over the period of 2005- 2018 (by 34.6%), in line with national emissions (34.9%). Medway has the second highest level of total emissions of all the districts in Kent, although it has the smallest per capita footprint.

²² Medway Council (2021): 'Medway Climate Change Action Plan' [online] available via [this link](#)

²³ Department of Energy and Climate Change (2011) '2005 to 2018 UK local and regional CO₂ emissions: Per capital local CO₂ emissions estimates; industry, domestic, and transport sectors' [online] available via [this link](#)

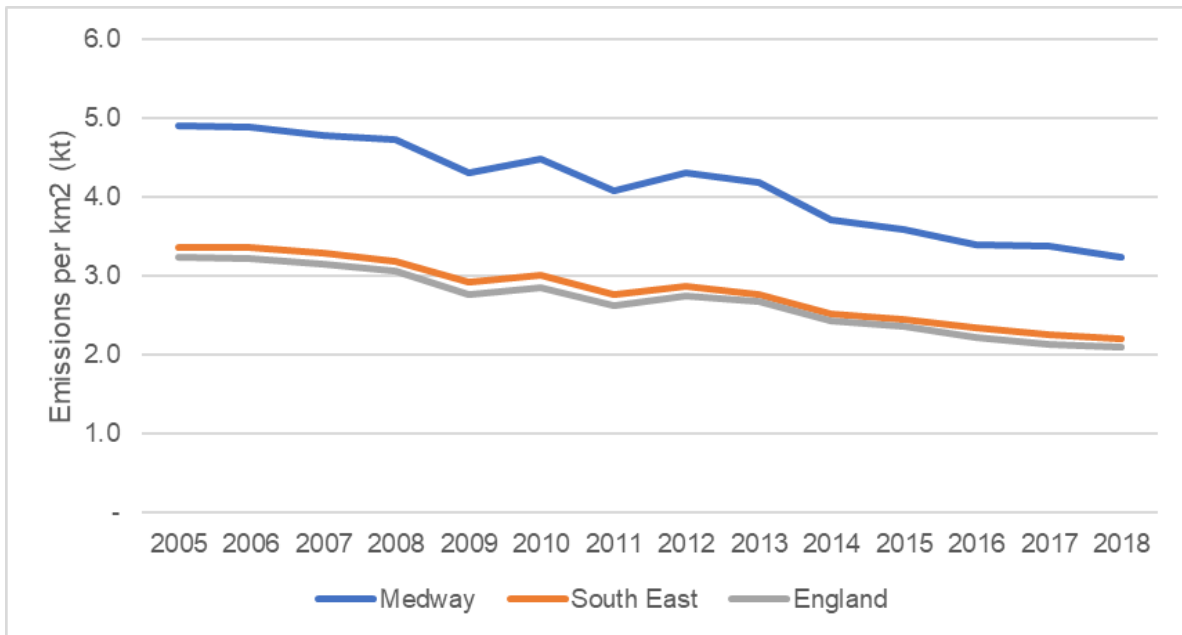


Figure A3.1: Carbon dioxide emissions (CO₂)

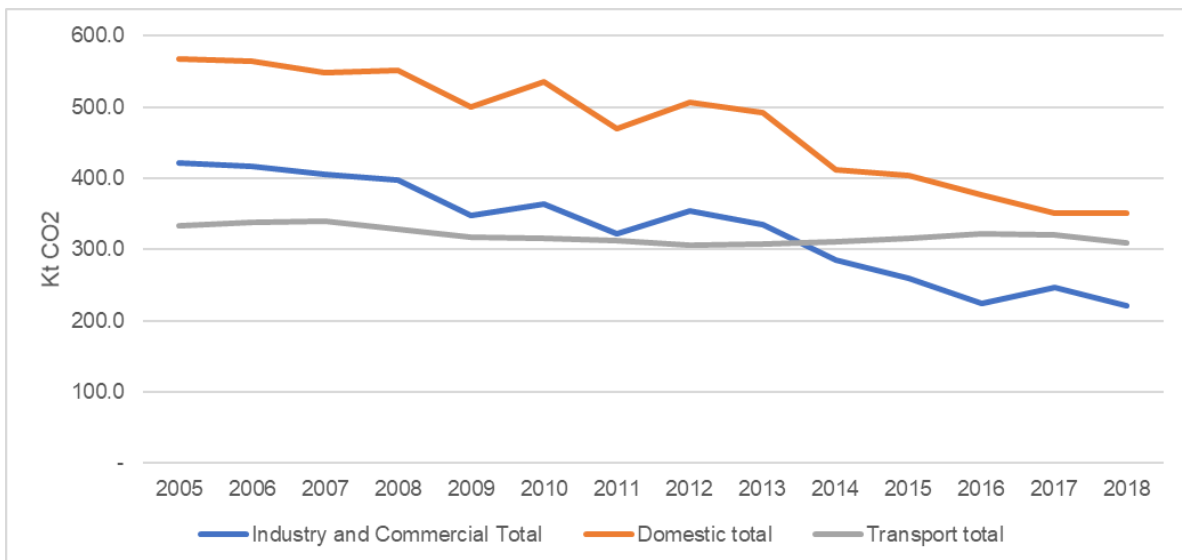


Figure A3.2: Emissions by sector (2005- 2018), Medway

A technical study conducted by the Council indicated that the main sources of emissions in Medway are operational buildings (heating and electricity) which account for 58% of total emissions, street lighting at 23% and emissions from Council fleet vehicles at 11%.²⁴

As shown in **Figure A3.2** above, the largest source of emissions in the Plan area as of 2018 was from the domestic sector. However, this total has decreased by 38.1% since the beginning of the monitoring period (2005). In this sector, the largest contributor is domestic gas.

The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport’s ‘Road to Zero’ report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all

²⁴ Medway Council (2021): ‘Medway Climate Change Action Plan’ [online] available via [this link](#)

vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030. As shown in **Figure A3.3** below, there are several fast chargers approximately 1km (~10 minutes' drive) from the Plan area, in the south at Capstone Farm and in the north at the University of Greenwich.



Figure A3.3: EV charging points, Chatham²⁵

²⁵ ZapMap (2020) Zap Map [online] available via [this link](#)

Table A3.2 Renewable energy capacity (MW), Medway²⁶

	Photo-voltaic	Onshore Wind	Hydro	Anaerobic Digestion	Offshore Wind	Wave /Tidal	Sewage Gas	Landfill Gas	Municipal Solid	Biomass	Animal biomass	Plant biomass	Cofiring	Total
2014	10.4	0.0	-	-	-	-	0.8	1.5	-	-	-	-	-	12.7
2019	28.9	0.1	-	-	-	-	0.8	1.5	-	-	3.4	-	34.6	

The Department for Business, Energy and Industrial Strategy publishes annual statistics on renewable energy generation, disaggregated by Local Authority. The most recent available data available is for 2019, presented in **Table A3.2** above. Photovoltaics contribute towards 83.5% of total renewable energy capacity in Medway and have increased by 18.5 MW between 2014 - 2019.

Flood Risks

Fluvial flood risk is shown in **Figure A3.4** below. Areas within Flood Zone 3 (>1% annual chance of fluvial flooding) follow a narrow ribbon at the north eastern part of the Plan area at the Brook, as well as the centre of the Plan area.

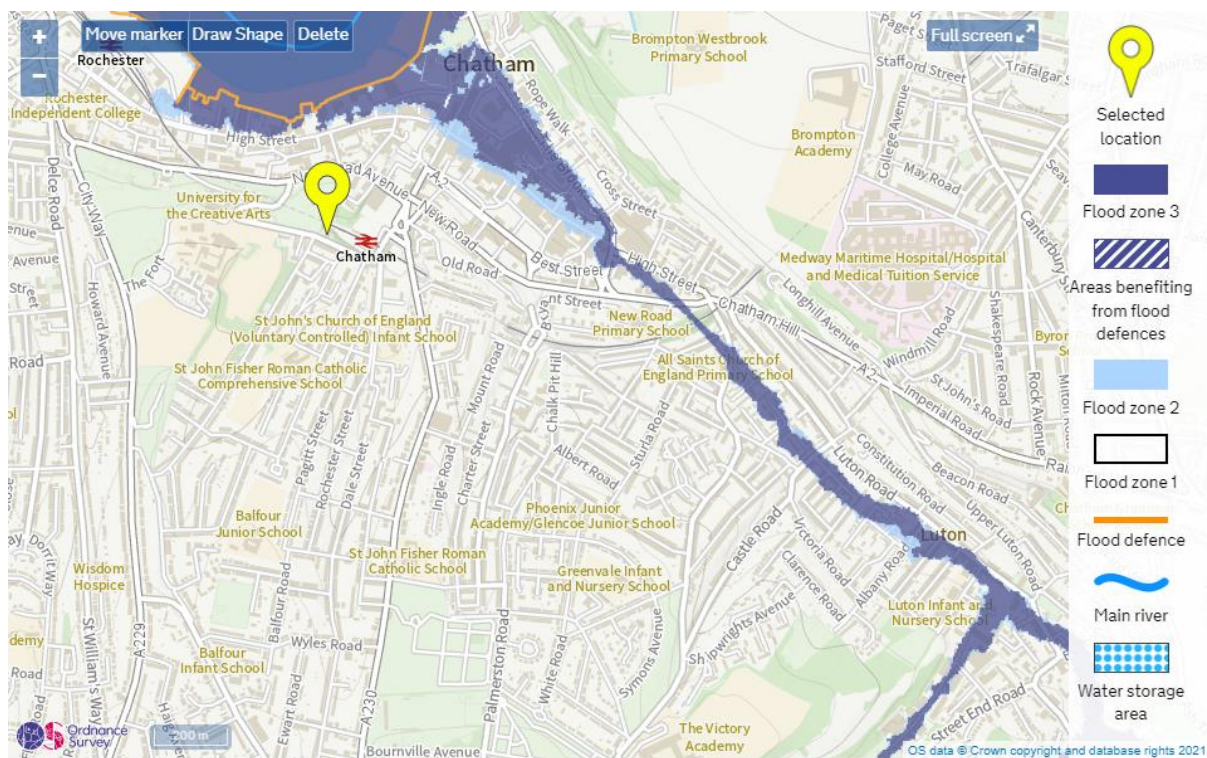


Figure A3.4: Fluvial flood risks within the ANP area²⁷

Surface water flood risk is shown in **Figure A3.5** below. Areas of highest surface water flood risk (>3.3% annual flood risk) are localised at the residential part of Luton Road and at parts of Chatham Hill. Some areas of medium risk (between 1- 3.3%) are also present at the Arches ‘residential area’.

²⁶ GOV.UK (2019), Regional Renewable Statistics [online] available via [this link](#)

²⁷ GOV.UK (2022): ‘Flood Map for Planning’, [online] available to access via [this link](#)



Figure A3.5: Surface water flood risks within the ANP area²⁸

Future Baseline

In line with UK trends and national commitments, emissions are likely to continue to fall as energy efficiency measures, renewable energy take-up and new technologies, such as EVs and solar PV, become more widely adopted. Notably, the Government has consulted on changes to England’s Building Regulations introducing a ‘Future Homes Standard’ and the Department for Transport recently published ‘Decarbonising Transport, setting the challenge’ a first step towards publishing a full transport decarbonisation plan.

In the future, new development could have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk. It is further recognised that climate change has the potential to increase the occurrence of extreme weather events. This has the potential to put residents, property, and development at increased risk of flood exposure. However, in line with the NPPF (2019) sequential testing is likely to ensure that development within areas at highest risk of flooding is largely avoided, and development is likely to deliver mitigation such as Sustainable Drainage Systems (SuDS).

²⁸ GOV.UK (2022): ‘Long term flood risk map for England’, [online] available to access via [this link](#)

A.4 Historic Environment and Townscape

This theme focuses on designated and non-designated heritage assets (including archaeology) and their setting as well as townscape character and visual amenity.

Policy Context

Table A4.1 presents the most relevant documents identified in the policy review for the purposes of The Arches Neighbourhood Plan SEA.

Table A4.1: Plans, policies, and strategies reviewed in relation to historic environment and townscape

Document Title	Year of publication
<u>National Planning Policy Framework (NPPF)</u>	2021
<u>The 25 Year Environment Plan</u>	2018
<u>The National Design Guide</u>	2019
<u>Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management</u>	2019
<u>Historic England Advice Note 3: The Setting of Heritage Assets</u>	2017
<u>Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)</u>	2016
<u>Chatham Town Centre Masterplan (2019)</u>	2019
<u>Chatham Centre and Waterfront Development Framework - Supplementary Planning Document</u>	2004
<u>Brompton Lines Conservation Area Appraisal</u>	2006
<u>Adopted Medway Local Plan (MLP)</u>	2003
<u>Emerging Medway Local Plan (2019- 2037) (EMLP)</u>	Emerging Local Plan

The key messages emerging from the review are summarised below:

- The key high-level principles for the conservation and enhancement of the historic environment are as follows:
 - The historic environment is a shared resource
 - Everyone should be able to participate in sustaining the historic environment
 - Understanding the significance of places is vital
 - Significant places should be managed to sustain their values
 - Decisions about change must be reasonable, transparent, and consistent
 - Documenting and learning from decisions is essential.

- The significance of places is the key element which underpins the conservation and enhancement of the historic environment as well as gives conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building an archaeological site or a larger historic area such as a whole village or landscape.
- The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring, and successful places, which respond to local character and provide a network of high quality green open spaces.
- The ANP will be required to be in general conformity with the NPPF, which ultimately seeks to conserve and enhance historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. Planning Practice Guidance expands on the NPPF recognising the proactive rather than passive nature of conservation.
- The role of the historic environment, as part of healthy and thriving ecosystems, landscapes, and cultural values, including settlement identity, is reiterated through the key messages of the 25 Year Environment Plan and National Design Guide.
- Historic England's Advice Notes provide further guidance in relation to the conservation and enhancement of the historic environment. Of relevance for the ANP is the emphasis on the importance of:
 - Understanding the different types of special architectural and historic interest which underpin designations, as well as how settings and/ or views contribute to the significance of heritage assets.
 - Recognising the value of implementing controls through neighbourhood plans, conservation area appraisals and management plans; and
 - Appropriate evidence gathering, including clearly identifying those issues that threaten an area or assets character or appearance and that merit the introduction of management measures.
- The ANP will also be required to be in general conformity with the MLP which contains policies directly relating to the historic environment, townscape, and landscape. The ANP will also need to acknowledge the emerging policies in the emerging local plan.
- In addition to conserving the historic environment, the ANP should seek to identify opportunities to enhance the fabric and setting of the historic environment. It should also seek to rejuvenate features and areas which are at risk of neglect and decay.

Current Baseline

Historic setting

The following summary has been presented from information provided within the Chatham Town Centre Masterplan and the Brompton Lines Conservation Area Appraisal, with both documents referenced in **Table A4.1** presented above.

Chatham developed as an urban settlement in later 17th and 18th centuries. Its origins lie in a medieval village based around the area of the parish church.

The town is within the setting of several important designated heritage assets including the scheduled Fort Amherst, the Grade I listed War Memorial (which was designed to be visible from across Medway and to offer views across Chatham to Rochester and Strood), the Brompton Lines Conservation Area which encapsulates the scheduled Chatham Lines and Fort Amherst (a substantial set of defences to protect the Dockyard), and their 'fields of fire' which survives as a largely open and undeveloped area now used as a park.

A major factor that shaped the current form of the area today was the construction of major fortifications on the high ground around the town. Other land such as the hill on which now stands Fort Pitt was similarly earmarked for military use. This forced the town of Chatham, which was then growing rapidly as a consequence of its dockyard, to develop in the low ground of the valley bottom in The Brook and at the river edge, linking from the Gun Wharf back towards Rochester.

Additionally, Chatham historic townscape mainly consists of mostly unlisted good quality Victorian buildings with some early 20th century buildings of merit, many of which are considered as non-designated heritage assets.

Designated Heritage Assets and Areas

Listed Buildings

According to the National Heritage List for England²⁹, there are five listed buildings located within or within proximity to the ANP area, as detailed below:

- **Chatham Naval War Memorial (Grade I)** – unveiled in the 1920s, the memorial has historic interest as an eloquent tribute to those who served in the Navy.
- **Pheasant House and Attached Front Garden Walls (Grade II)** – a 17th century house, refurbished in the mid-19th century.
- **Thorney Lodge (Grade II)** – 19th century house, with 20th century machined tiles.
- **Chatham Ragged School (Grade II)** – listed due its surviving principal elevations and open character and rarity as a surviving example of a purpose-built ragged school.
- **Former Town Hall and Medway Arts Centre (Grade II)** – originally built in the 19th century and lined with Bath limestone ashlar, ragstone rock-faced plinth and slate roof.

²⁹ Historic England (2022): 'National Heritage List for England', [online] available to access via [this link](#)

Scheduled Monuments

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England¹, whilst there are no scheduled monuments within the Plan area, two significant scheduled monuments are located just to the north, as follows:

- **Chatham Lines, section at Chatham Gun Wharf:** The Chatham Lines were first constructed in 1755 as a defensive fortification to protect the landward side of Chatham Dockyard and the subsequently associated barracks. The section of The Lines at Chatham Gun Wharf is a critical component of the early 19th century defences and represents the southern terminal of the circuit. The monument survives in good condition and includes archaeological evidence of the earlier 1750s defence and of one of the defended gateways into the militarised zone. The relationship of The Lines and the Gun Wharf is also of considerable importance to our understanding of Chatham's military function. The monument comprises a section of Chatham Lines at Chatham Gun Wharf known as the Barrier Ditch. It represents the early 19th century modification of the most southerly section of the defences on the Gun Wharf, and includes the terminal end adjoining the eastern bank of the River Medway.
- **Brompton Lines:** Landward defences to dockyard at Chatham, subsequently used in part as a pleasure ground for officers. Defences cross Ministry of Defence owned land, housing, and Brompton Barracks.

Conservation Areas

The northern part of the Plan area falls within the Brompton Lines Conservation Area, bordering the residential area at Lines Terrace. A Conservation Area appraisal for the area was prepared in 2006. The Conservation Area was designated due to its historically significant parts of the former defences of the Dockyard.

The part of the Conservation Area influencing the setting of the Plan area contains 'The Chatham Lines', a system of linear defences (ditches and ramparts known as '*the Lines*') which were constructed rising up the scarp of the hill above the dockyard and continuing north down the dip slope to re-join the estuary at St Mary's Island (which was marshland until reclaimed in Victorian times). The Lines is a high valued and distinctive landscape designated as an area of local landscape importance within the current local plan.³⁰

The defences still overlook the Dockyard and constitute a near intact military landscape, which is well preserved (see **Figure A4.1**). As shown in **Figure A4.2** below, the Plan area falls within the setting of the 'Great Lines' area of the Chatham Lines. Most of the Great Lines survives today in its open state, with some minor encroachment by modern army housing and enclosed playing fields.

³⁰ Medway Council (2011): 'Medway landscape Character Assessment' [online] available to access via [this link](#)



Figure A4.1: An aerial view of the Chatham Lines and the Dockyard³¹

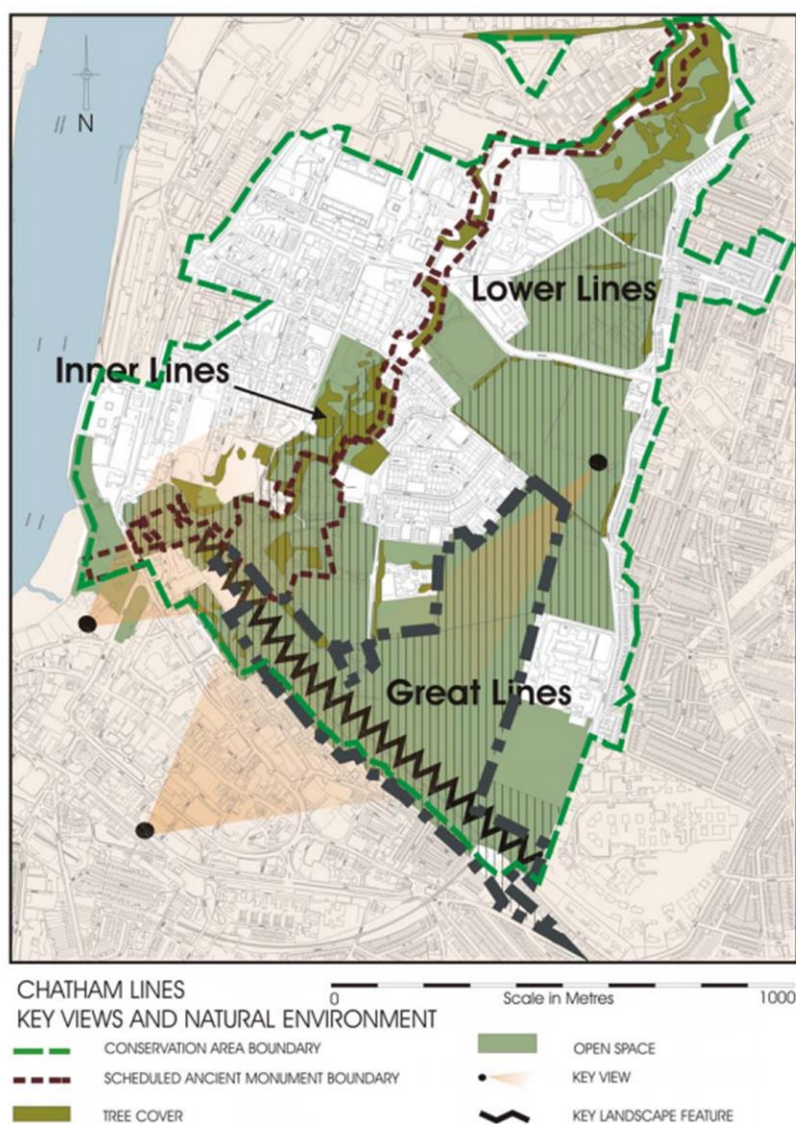


Figure A4.2: The Chatham Lines

³¹ The Historic Dockyard (n.d.): 'Chatham Lines' [online] available via [this link](#)

The topography of Brompton Lines Conservation Area is central to the development and character of the area. Currently, the Lines is a largely open and undeveloped area now used as a park. The Lines themselves were sited to take maximum advantage of the hillside above the dockyard to protect this high ground from seizure and hence prevent the landward bombardment and attack of the dockyard. The southern part of the Great Lines remains largely undeveloped and covered with a mix of dense scrub and semi-improved grassland. The southern edge forms a steep scarp that overlooks Chatham and dominates the skyline. Attention is focused on the Grade I listed Naval Memorial, a striking landmark that commemorates those who lost their lives in the First World War, overlooked by the Plan area.

Kent Historic Environment Record

As shown in **Figure A4.3** below, there is one HER record within the Plan area: 'Palaeolithic hand axes and other finds from general Chatham area', specifically:

- A hand axe (dated to the Lower Palaeolithic to Middle Palaeolithic - 500000 BC to 40001 BC)
- A retouched flake (dated to the Lower Palaeolithic to Middle Palaeolithic - 500000 BC to 40001 BC)

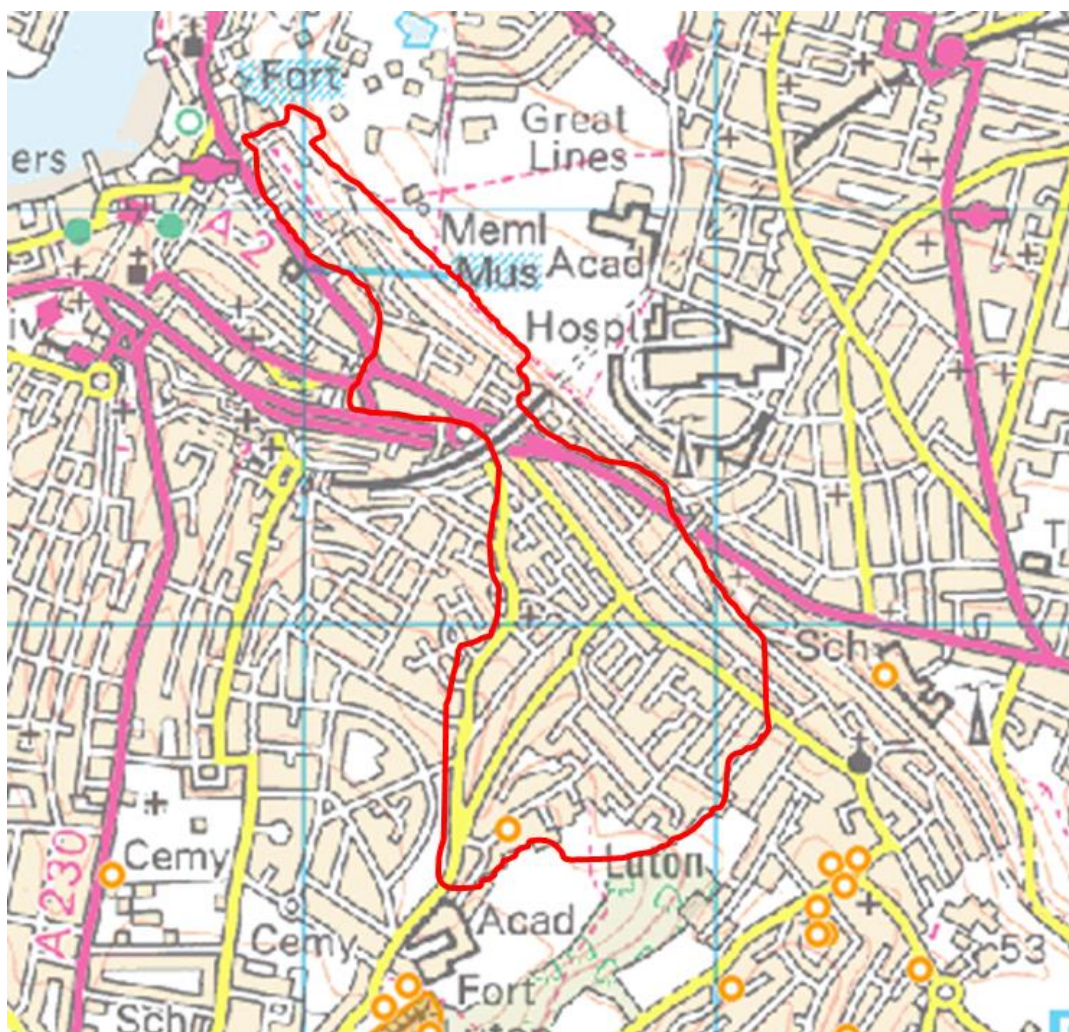


Figure A4.3: Kent HER entries within and surrounding the ANP area³²

³² Kent County Council (2019): 'HER record search' [online] available via [this link](#)

Heritage at Risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. As of July 2021, the Heritage at Risk Register, does not identify any designated heritage asset in the Plan area at risk.³³ Though there are no assets at risk within the Plan area, a section of the Brompton Lines, which is adjacent, is designated as being 'at risk'. The Lines are currently in 'poor' condition (slow decay).

Townscape Character

The Brook

The Chatham Town Centre Masterplan (2019) details a number of landscape character areas in Chatham, known as 'Urban Quarters'. 'The Brook' urban quarter comprises the northern part of the Plan area (see **Figures A4.4 and A4.5**). The Chatham Centre & Waterfront Development Framework (2004) details further information regarding the Brook. The Brook was once a green inlet to the Medway but is now a busy highway (the A231) which forms part of a one-way system in Chatham. The northern part of the Brook includes the distinctive nineteenth century Town Hall, and now hosts the Brook theatre. The theatre, along with the adjacent public house and Territorial Army Building, provides a highly distinctive local character to the northern end of the Brook. The central part of the Brook is noted to have 'poor' landscape quality, with the Bus Station frontage and Pentagon Centre, Brook Streetcar Park, and overhead access road dominating the streetscape. The townscape quality is further diminished by the less sightly architecture of Police and Security centre buildings. However, the southern part of the Brook has a 'dramatic' change in scale and composition with limited built frontage onto the street. The Great Lines is visible over the northeast side of the Brook with a line of trees along the bottom edge of the Lines, providing a green backdrop to the area.

The Brook is also noted to have the following key constraints:

- Areas around The Brook impacted by difficult topography, busy roads, and infrastructure - hindering connectivity to the Great Lines Heritage Park.
- Entries to Fort Amherst and the Great Lines Heritage Park are often in 'out of the way' locations, with limited signage to aid in wayfinding; and
- Previously cleared areas are left with no function or clear uses.

³³ Historic England (2021): 'Heritage at Risk Registers' [online] available via [this link](#)



Figure A4.4: The Brook (A231), facing south east³⁴



Figure A4.5: The Brook (A231), facing north west

The Arches Residential Area

In comparison, the southern part of the Plan area is primarily residential, with linear roads of small houses overlooking the varying landform of the area, known as 'The Arches residential area'. Fort Pitt is lower in the landscape and provides pleasant views of raised features such as Rochester residential area to the south (see **Figures A4.6 and A4.7**). The Arches residential area is a historic part of Chatham, first developed in 1858. Its architectural character reflects this history. The area mainly has Edwardian, Victorian and post-war buildings era, as well as more contemporary

³⁴ Google Maps (2021): 'Google Street view' [online] available via [this link](#)

architecture. The Arches' character can be described as 'eclectic', with a range of different styles that complement one another.

The Brook and Arches residential area are separated by the main A2 road (Chatham Road) which provides a strong boundary between the retail and residential parts of the Plan area (shown in **Figure A4.8**).



Figure A4.6: Victoria road, facing south-east



Figure A4.7: Luton Road, facing south



Figure A4.8: Chatham road, facing north-west towards Chatham town centre

Future Baseline




Though it is acknowledged that Chatham's designated and non-designated assets will continue to be afforded protection under the provisions of the NPPF, adopted Local Plan, and emerging Local Plan, it is recognised that future development has the potential to negatively affect historic character and settings, detract from historic settlement qualities and disrupt valued viewpoints; being susceptible to insensitive design and layout in new development.

Additionally, development has the potential to lead to incremental changes in landscape quality in and around the Neighbourhood Plan area, including the wider setting of the Great Lines, Dockyard, and the historic Arches Neighbourhood. In the absence of the Neighbourhood Plan more speculative development may come forward within the open countryside or countryside setting, which could place increased pressure on local settings.




However, locally distinctive landscape and townscape features, characteristics and special qualities can be protected, managed, and enhanced through the Neighbourhood Plan. New development that is appropriately designed/ master planned, and landscape-led, has the potential to support and improve the area's inherent landscape character and quality such as the Brook and Arches residential area. Additionally, despite its urban location, the open part of the Great Lines has great historic and landscape value and potential for improvement as part of a 'green lung' linking the countryside to the south into Medway.

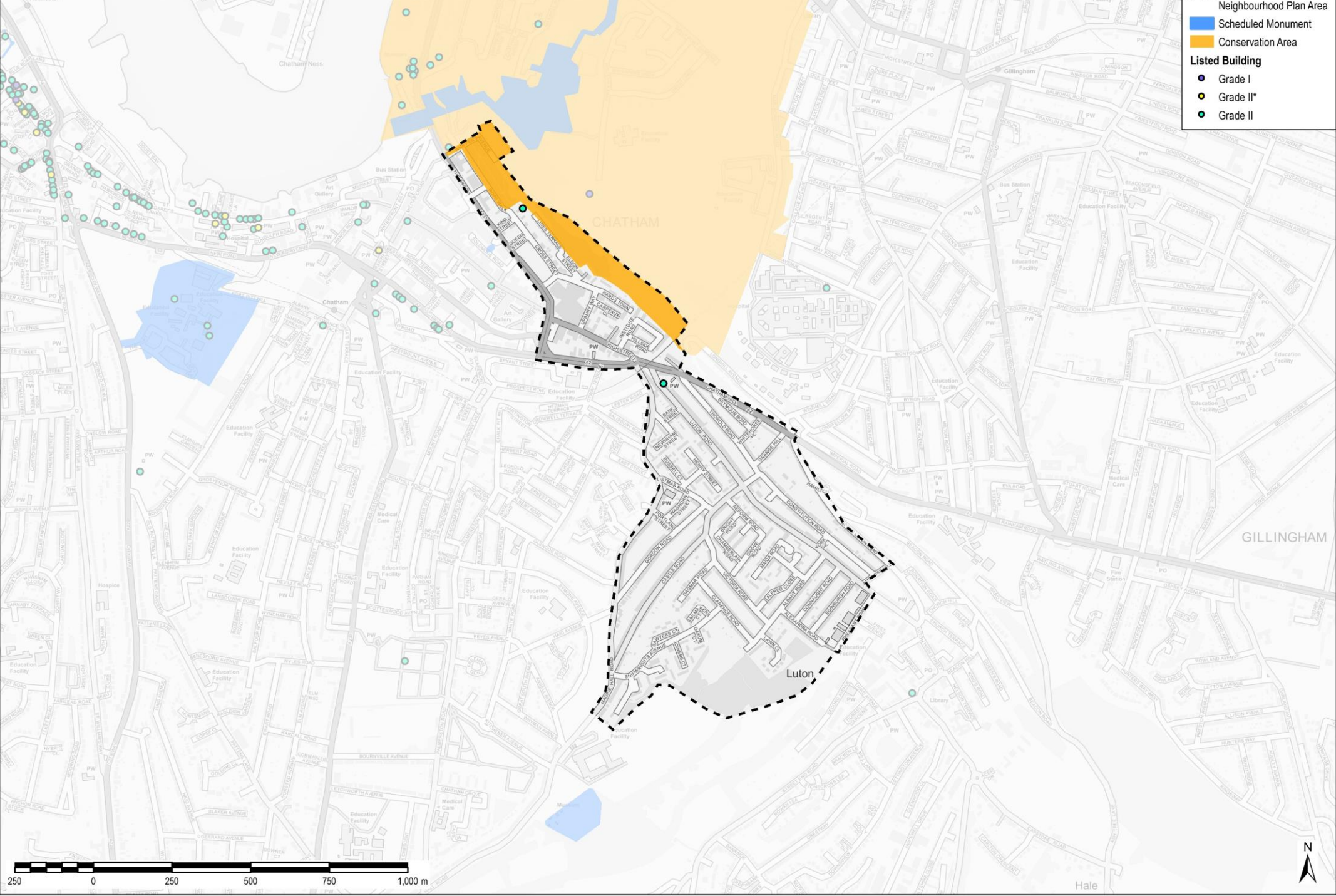
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LEGEND

-  Arches 'Chatham' Neighbourhood Plan Area
-  Scheduled Monument
-  Conservation Area

Listed Building

-  Grade I
-  Grade II*
-  Grade II



A.5 Land, Soil, and Water Resources

This theme focuses on the quality of soil resources, water supply and water quality in The Arches Neighbourhood Plan area.

Policy Context

Table A5.1 presents the most relevant documents identified in the policy review for the purposes of The Arches Neighbourhood Plan SEA.

Table A5.1: Plans, policies, and strategies reviewed in relation to land, soil, and water resources

Document Title	Year of publication
<u>National Planning Policy Framework (NPPF)</u>	2021
<u>The 25 Year Environment Plan</u>	2018
<u>Safeguarding our Soils: A strategy for England</u>	2009
<u>Future Water: The government's water strategy for England</u>	2011
<u>Water for Life</u>	2011
<u>The National Waste Management Plan</u>	2013
<u>Southern Water: Water Resources Management Plan (2020–70)</u>	2020
<u>Minerals and Waste Local Plan (Kent)</u>	2013
<u>Adopted Medway Local Plan (MLP)</u>	2003
<u>Emerging Medway Local Plan (2019- 2037)</u> (EMLP)	Emerging Local Plan

The key messages emerging from the review are summarised below:

- The ANP will be required to be in general conformity with the NPPF, which seeks to protect high quality soil resources, and improve the water environment; recognising the wider benefits of natural capital and derived from ecosystem services. Furthermore, the NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.
- The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, clean and plentiful water, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our soils) which seeks to ensure that all England's soils will be managed sustainably and degradation threats tackled successfully by 2030, as well as the national water strategies which seek to secure sustainable and resilient

water resources and improve the quality of waterbodies, and the national waste plan which seeks to identify measures being taken to move towards a zero waste economy.

- Southern Water's WRMP further highlights the acute stresses that the catchment faces in the coming years and the challenges faced by the WRZ for Chatham, in terms of securing water resources into the future in one of the driest regions in England. The Plan outlines how Southern Water aim to confront and manage these issues to ensure the timely provision of clean water to all residents in the period up to 2070.
- The ANP will also be required to be in general conformity with the Kent Minerals and Waste Plan, which form part of the Local Development Frameworks for the area. The Plan sets out the vision and strategy for waste management and mineral provision up until the year 2030. It also contains a few development management policies for evaluating minerals and waste planning applications.
- Furthermore, the ANP will also be required to take note of and be in general conformity with the adopted local plan, which contains policies specifically relating to efficient land use, water resources and the sustainable use of resources. It will also be necessary for the ANP to be in general conformity with the emerging local plan.

Current Baseline

Soil Resources and Geology

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. In this regard, the entirety of the Plan area is brownfield land, classified as 'urban'.

With regards to bedrock geology, Chatham is primarily underlain by Lewes Nodular Chalk formation and London Clay - Claygate Member, as depicted in **Figure A5.1** (on the next page).

Water Resources and Quality

The Plan area falls within the Thames River Basin District, the Medway Management catchment and Medway Lower Operational catchment. There are no significant water bodies running through the Plan area.

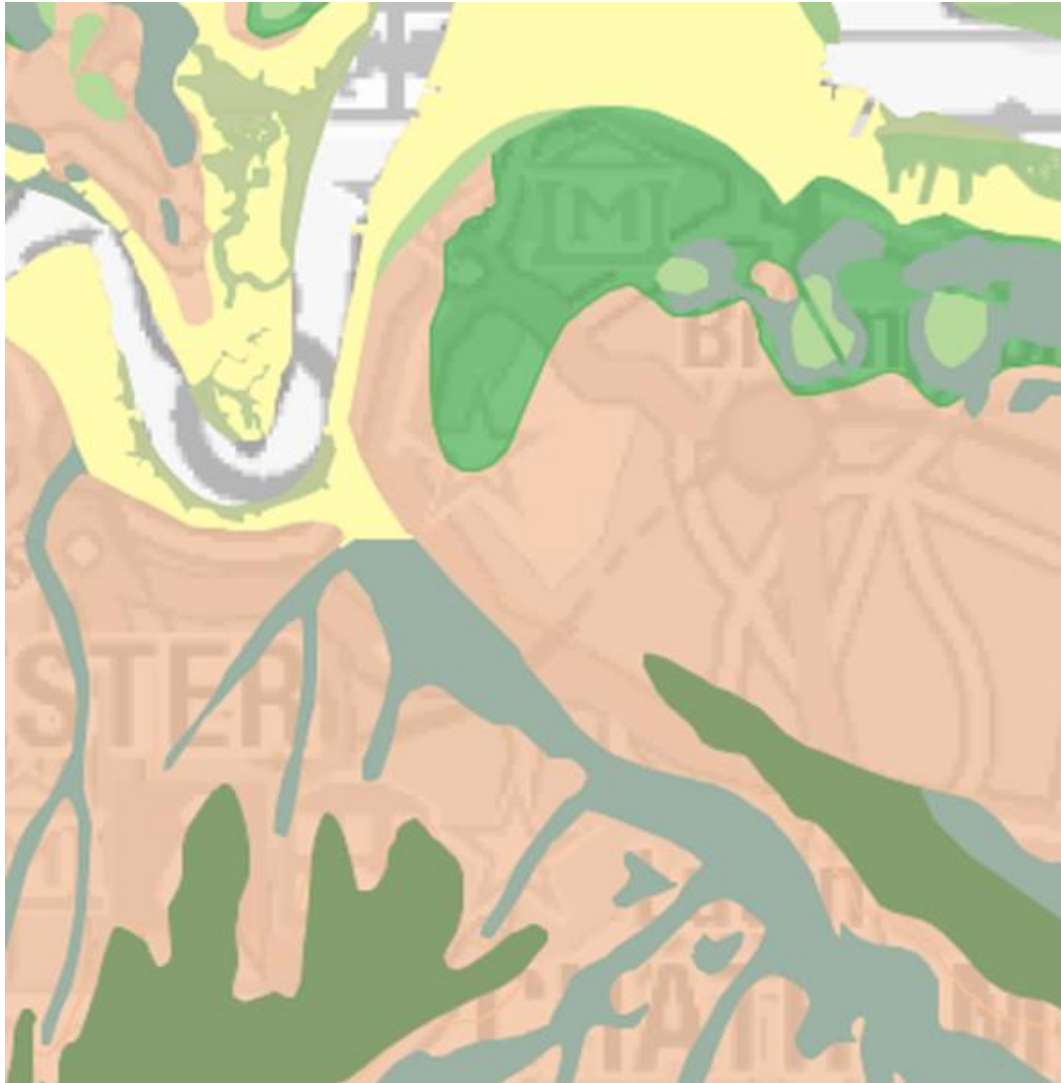
Medway District is served by Southern Water and falls within the 'Eastern' area. Within their Water Resource Management Plans (WRMPs) water companies refer to their Water Resource Zones (WRZs). A WRZ is the largest possible zone in which all resources, including external transfers, can be shared and hence the zone in which all customers experience the same risk of supply failure from a resource failure. In this respect, the Plan area falls within the Medway Upper WRZ. Most of the water in the area is sourced from groundwater and the rest from the River Medway.³⁵ The Kent Water Sustainable Growth Study (2017)³⁶ indicated that the predicted supply-demand deficit for the Medway WRZ with no interventions in 2030-

³⁵ Southern Water (2019): 'Securing a resilient future for water in the South East' [online] available via [this link](#)

³⁶ Kent County Council (2017): 'Kent Water Sustainable Growth Study' [online] available via [this link](#)

1 is between -35 to -25 MI/d, one of the highest deficits out of the Kent WRZs. This indicates future water scarcity in the Plan area.

The Plan area does not fall within any Nitrate Vulnerable Zones (NVZs); however, the southern part of the Plan area falls within a Source Protection Zone SPZs for Zone II and III, indicating the vulnerability of groundwater resources in the area.



Bedrock geology

- | | |
|--|---|
| Thanet Sand Formation | Bagshot formation |
| Thanet Sand - Bullhead Bed | Lambeth Group |
| Harwich formation | Folkestone formation |
| London Clay formation | Lewes Nodular Chalk formation |
| Lewes Nodular Chalk formation | West Melbury Marly Chalk Formation |
| London Clay - Claygate Member | Zig Zag Chalk Formation |
| Gault formation | |
| Chalk | |
| Melbourne Rock | |
| Lenham formation | |

Figure A5.1: Geological resources within and surrounding the ANP area³⁷

³⁷ Medway District Council (2016): 'Local Aggregate Assessment' [online] available via [this link](#)

Future Baseline

Future development has the potential to affect water quality through increased consumption, diffuse pollution, waste-water discharges, water run-off, and modification, particularly considering deficits predicted by the Kent Water Sustainable Growth Study. It is considered that the Local Plan will seek to address any water supply and wastewater management issues over the plan period in line with the WRMP; and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Plan area and wider area. It will be important for new development to avoid impacts on water quality and to contribute to reducing consumption and improving efficiency.

It is anticipated that development will be built within the existing urban area of Chatham Town, and therefore is unlikely to displace BMV land. Any development within the Plan area will take place on previously developed land.

It is considered unlikely that the small-scale development likely to come through the Neighbourhood Plan will have a significant impact on SPZs.

A.6 Community Wellbeing

This theme focuses on the demographics and households of the population in the Arches Neighbourhood Plan area, as well as access to services and facilities, and the health of residents.

Policy Context

Table A6.1 presents the most relevant documents identified in the policy review for the purposes of The Arches Neighbourhood Plan SEA.

Table A6.1: Plans, policies, and strategies reviewed in relation to community wellbeing

Document Title	Year of publication
National Planning Policy Framework (NPPF)	2021
Medway Housing Strategy (2018)	2018
Adopted Medway Local Plan (MLP)	2003
Emerging Medway Local Plan (2019- 2037) (EMLP)	Emerging Local Plan
Medway Council Playing Pitch Strategy (2012)	2012
Medway Joint Health and Wellbeing Strategy (2018-2023)	2018
Medway Community Safety Plan (2016)	2016

The key messages emerging from the review are summarised below:

- The Arches Neighbourhood Plan will be required to be in general conformity with the NPPF, which overall seeks to retain and enhance access to community services and facilities, including health facilities, educational facilities, and open space. The NPPF recognises the benefits of a range of local provisions supporting community needs, including in rural areas. The framework seeks to protect settlement and community identities. Furthermore, the NPPF recognises the benefits of creating

cohesive communities, in safe environments where crime and the fear of crime do not undermine the quality of life of residents.

- The district housing, homelessness, and community strategies each seek to support the appropriate delivery of housing and community infrastructure. The strategies recognise the importance of targeting resources at those most at risk/ most vulnerable and supporting all residents needs for affordable, safe, and good quality housing in the right places. Furthermore, the strategies recognise the need to create choice in terms of securing a long-term stable home and create adaptable homes supported by high levels of accessibility.
- In addition, the Arches Neighbourhood Plan will be required to be in general conformity with the adopted Local Plan which include policies relating to the provision and type of housing, supply of employment land, retail provision, residential amenity, and tourism services.
- The 2020 Health Equity in England Report identifies that the health gap between less and more deprived areas has grown in the last decade, where more people can expect to spend more of their lives in poor health, and where improvements to life expectancy have stalled, or even declined for the poorest 10% of women.
- The Planning for Sport Guidance seeks to help the planning system provide formal and informal opportunities for everyone to take part in sport and be physically active. The Guidance outlines 12 'planning-for-sport' principles.
- The ANP will also be required to be in general conformity with the MLP which contains policies directly relating to town uses, the economy and community facilities. The ANP will also need to acknowledge the emerging policies in the emerging local plan.

Current Baseline

Local Economy

Chatham is the largest retail centre in Medway. The Draft Plan notes several key challenges with regards to the local economy of Chatham, detailed below.

- Chatham High Street has high levels of pedestrian activity, but Luton Road, has a poorer quality streetscape. There is a notable loss of retail and commercial spaces along Luton Road.
- The look of the area and the poor management of the buildings is affecting the relocation of new businesses.
- There is a lack of services and providers such as superfast broadband.
- There are few SMEs in Chatham, and few services that provide skills training.
- The lack of commercial and retail options available within walking distance to residents of the area is a large issue considering that nearly 50% of people do not own a car.
- There are no low-cost supermarkets to purchase groceries after 7pm.
- There is poor connectivity to the high street due to the roundabout and dual carriageway which make pedestrian movement unsafe.

- Existing retail and commercial spaces are expensive to rent for independent businesses, and in some cases are intentionally left vacant for land banking.
- Connectivity between residential areas and commercial streets is poorly designed and of poor quality.
- The perceived reputation of the area discourages new business.
- Only 55% of those living in the Arches work within Medway.
- Operational issues created by congestion from the city estate in Chatham impede economic growth.

The Plan area falls within the River and Chatham Central electoral council wards.³⁸ With regards to employment, of the economically active population which live in the River ward, 67.9% of them are in employment. This area includes the waterfront and some of the main town centre areas. In comparison, of the economically active residents which live in the Chatham Central ward, 64.2% of them are in employment.

Housing

With regards to housing, the Draft Plan notes that there is a decrease in the supply of family homes and a further decrease in existing supply due to the conversion into flats and temporary or emergency accommodation. There is also a rise in empty and derelict housing.

Affordability is also an issue in Chatham due to an influx of people from various London boroughs, which has increased rental prices significantly. An assessment of average house prices against local incomes for the neighbourhood area, noted in the Draft Plan, has indicated a significant gap between income and the cost of homes. Additionally, little outdoor amenities effect resident's desire to move into properties in certain areas. Finally, an overconcentration of Housing of Multiple Occupancy (HMOs) has impacted community balance and amenities.

Deprivation

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible. The Neighbourhood Plan area falls within six LSOAs: Medway 015D, Medway 015E, Medway 020A, Medway 020D, Medway 020B and Medway 022D.

The Index of Multiple Deprivation 2019 (IMD)³⁹ is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights. As shown in **Table A6.2**, several parts of the Plan area are heavily deprived with regards to a number of deprivation indices detailed below:

- Income deprivation- a high proportion of residents' experience deprivation relating to low income in the Plan area.
- Employment deprivation- a high proportion of residents in Chatham in the working age population are involuntarily excluded from the labour market.

³⁸ Medway Council (2021): 'Medway Elects' [online] available via [this link](#)

³⁹ Gov UK (2019): 'Indices of Deprivation' [online] available via [this link](#)

- Education, Skills and Training- a high proportion of students in Chatham have a lack of attainment and skills in the local population.
- Health Deprivation and Disability- residents in Chatham have a high risk of premature death and impairment of quality of life through poor physical and mental health.
- Crime- there is a high risk of personal and physical victimisation at the local level.
- Living Environment deprivation- there a poor local living environment in the Plan area.
- Income deprivation affecting children- there is a high proportion of children living in income deprived families in the Plan area.
- Income deprivation affecting older people- a high proportion of those aged over 60 who are living in income deprivation in the Plan area.

Overall, LSOAs within the Plan area are highly deprived in comparison to other areas in the UK. LSOAs within the Plan area with the highest levels of Deprivation (10% most deprived) are Medway 015E, 020D, 020B and 022D.

Table A6.2: LSOAs in the Arches Plan area

LSOA						
Indices	015D	015E	020A	020D	020B	022D
Income deprivation	40% most deprived	10% most deprived	10% most deprived	10% most deprived	10% most deprived	10% most deprived
Employment deprivation	40% most deprived	10% most deprived	30% most deprived	10% most deprived	10% most deprived	20% most deprived
Education, Skills and Training	30% most deprived	10% most deprived	10% most deprived	10% most deprived	10% most deprived	10% most deprived
Health Deprivation and Disability	30% most deprived	10% most deprived	40% most deprived	20% most deprived	10% most deprived	40% most deprived
Crime	10% most deprived	10% most deprived	10% most deprived	10% most deprived	10% most deprived	10% most deprived
Barriers to Housing and Services	40% most deprived	50% most deprived	50% least deprived	40% least deprived	50% most deprived	50% least deprived

Living Environment deprivation	20% most deprived	20% most deprived	10% most deprived	10% most deprived	20% most deprived	20% most deprived
Income deprivation affecting children	30% most deprived	10% most deprived	10% most deprived	10% most deprived	10% most deprived	10% most deprived
Income deprivation affecting older people	30% most deprived	10% most deprived	20% most deprived	20% most deprived	10% most deprived	40% most deprived
Overall	20% most deprived	10% most deprived	20% most deprived	10% most deprived	10% most deprived	10% most deprived

Population

As of 2019, the total population across these two wards is 29,157. The age distribution for these wards are shown below in **Figure A6.1**. The average age of residents in this area is 34. The largest age groups are 25-29-year olds, 20-24-year olds and 35-39-year olds. In comparison to figures for Medway and England as a whole, the proportion of residents aged over the age of 60 is lower in the ward areas.

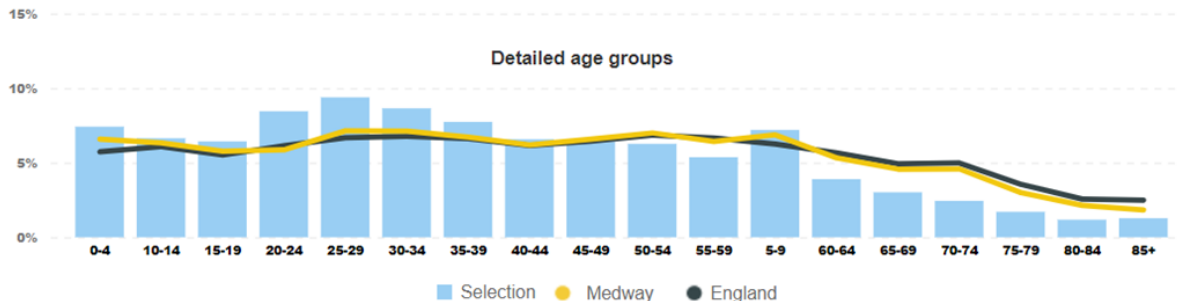


Figure A6.1: Age distribution within the River and Chatham wards

Education and skills

With regards to educational attainment, a smaller proportion of residents have no qualifications when compared to figures for Medway and England as a whole. However, a lower proportion of residents have achieved level 4 qualifications and above in comparison to statistics for England as a whole, though not for Medway.

In terms of schools, there are a number of educational facilities in Chatham. There are three primary schools in Chatham: New Road, All Saints C of E and Luton Primary. The closest secondary school to the Plan area is the Victory Academy, located just south of the Plan boundary.

Key services and facilities

Chatham is the main retail and town centre within Medway and is well serviced by rail and bus transport, via the Chatham Waterfront Bus Station and Chatham Rail Station.

Chatham town centre has good shopping facilities within Medway and from Bluewater shopping centre which is in proximity. Chatham has a few national chain retailers and smaller independent shops and businesses in the town centre. Additionally, the three universities in Medway contribute more than £143.6m and support over 1,200 jobs within the local economy, these are:

- Canterbury Christ Church University
- University of Greenwich
- University of Kent including Medway School of Pharmacy and UTC

With regards to outdoor facilities, there are a few play spaces noted in the Playing Pitch Strategy⁴⁰ listed below:

- Barnfield Playing Fields
- Brompton Westbrook Primary School
- Fort Pitt Grammar School
- Great Lines Heritage Park
- Green acre Academy
- Greenvale Infant School
- Holecombe Grammar School
- Hook Meadow
- Kingfisher Community Primary School
- Lordswood School
- Lordswood Sport and Social Club
- Luton Rec
- Maidstone Road Sports Ground
- Oaklands Junior School
- Snodhurst Bottom
- St John Fisher Catholic School Sports Field
- St Marys Island Ce Primary School
- Swingate Primary School
- The Garrison Ground
- The Victory Academy

General Health

As shown in **Figure A6.2 (a and b)** below, the majority of residents in the wards have 'very good' or 'good' health (86%). The River ward has the highest proportion of residents in this category when compared to other wards in Medway (86%). Chatham Central has a lower proportion of residents in this category (81%), though is in line with overall averages for Medway.

⁴⁰ Medway Council (2019): 'Medway Council Playing Pitch Strategy' [online] available via [this link](#)

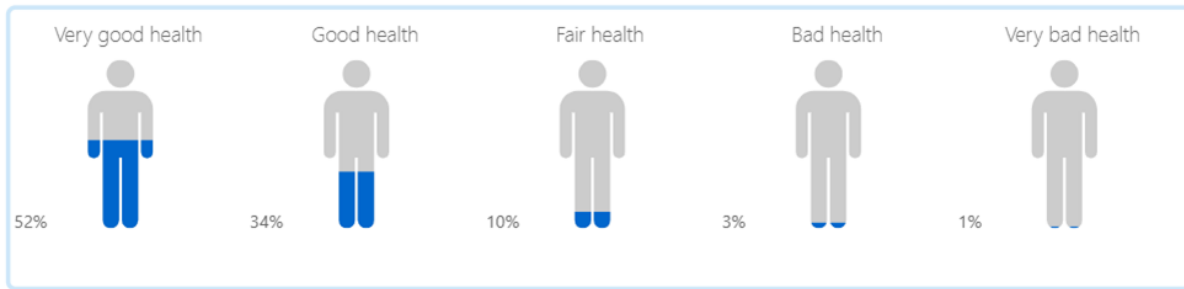


Figure A6.2a: General Health (2011), The River and Chatham Central⁴¹

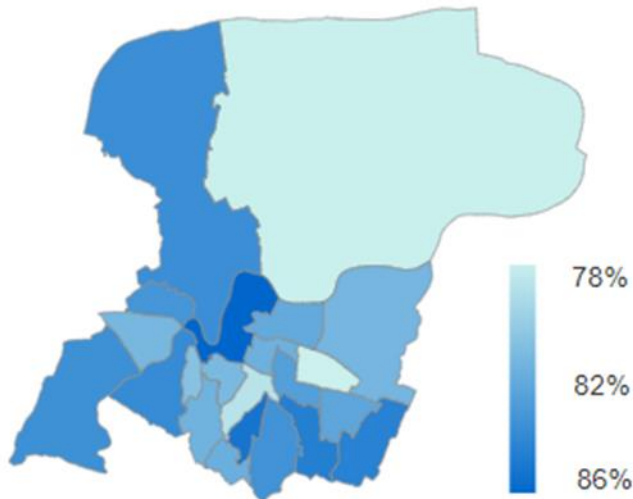


Figure A6.2b: Residents with 'good' or 'very good health' in Medway (2011)

In comparison to other wards in Medway, there is a higher proportion of residents with long term health conditions in the Chatham Central ward (14%) (16% in Medway). Additionally, life expectancy in Chatham Central is 3% lower for males and females in comparison to averages for Medway.

In terms of child health indicators, childhood obesity in Year 6 is also higher in the Chatham Central ward (by 6%) than the Medway average.

With regards to medical services, Medway Maritime Hospital is situated 50m from the east border of the Plan area, offering GP and emergency services.

Crime

Crime in Medway is notably higher in the central wards. Chatham Central recorded 3,705 crimes between April 2020- 2021. The River ward recorded 4,485 crimes during this same period.

Future Baseline

Levels of deprivation in the Plan area are high in relation to a number of indices. Deprivation is a complex issue, with many factors at play. However, plan making offers an opportunity for future development to reduce deprivation by better connecting residential areas to services and educational opportunities, meeting necessary building performance standards and creating better community cohesion.

⁴¹ Medway Council (2011): "Ward profiles- Health" [online] available via [this link](#)

The suitability (e.g. size and design) and affordability of housing to meet local needs will depend on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of delivering the right mix of housing types, tenures, and sizes in suitably connected places.

Although many residents in the Plan area are likely to continue to have good health, given the proportion of residents with long-term health conditions, it will be useful for development to support access to key healthcare services and recreational opportunities wherever possible.

Considering the recovery from the Covid-19 pandemic, homeworking is likely to become a more prevalent trend, and this is likely to alter the commuting patterns and access trends of residents into the future. Whilst uncertainty remains, the ANP provides opportunities to guide development which accommodates for changing working patterns and lifestyles, and places greater emphasis on access to local services, facilities, employment options and strategic connectivity. New strategic development sites nearby may also increase accessibility for residents to some degree in the future.

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