

Interim Sustainability Appraisal Report



Serving You

March 2017

Contents

1.	NON-TECHNICAL SUMMARY	1
2.	SUSTAINABILITY APPRAISAL	3
3.	INTERIM SUSTAINABILITY APPRAISAL	8
4.	ASSESSING IMPACT AND DEVELOPING ALTERNATIVES	.14



1. NON-TECHNICAL SUMMARY

- 1.1 This interim Sustainability Appraisal report provides an overview of the assessment work undertaken on the Local Plan to date. The report will provide a clear narrative of the development options and policy approaches and how these have been assessed against the Sustainability Framework and Objectives with the consideration of alternatives.
- 1.2 It is a legal requirement to undertake a Sustainability Appraisal (SA), which is set out in the Compulsory Purchase Act 2004, the National Planning Policy Framework 2012 and The Town and Country Planning (Local Planning)(England) Regulations 2012. Sustainability Appraisals are mechanisms for considering and communication the likely significant effects of a draft plan, reasonable alternatives and the reason for rejecting options. It also seeks to mitigate unavoidable adverse effects and maximise positives.
- 1.3 Medway Council is preparing a Local Plan to provide guidance for future growth in the Authority. Having consulted on the Local Plan Issues & Options in January/February 2016, the Authority is now consulting on the Local Plan Development Options. Comments received during this consultation period will be taken into account in drafting the Pre-Submission Local Plan, which will be consulted upon toward the latter part of 2017/2018, with adoption anticipated in late 2018/19. Once adopted, the Local Plan will form part of Medway's Development Plan. Currently the development plan consists of the saved policies of the 2003 Medway Local Plan.
- 1.4 The SA/SEA process is an iterative process that takes place alongside preparation of the Local Plan and consists of 5 stages:
 - Stage A: Setting the context and objectives, establishing a baseline and deciding on the scope
 - Stage B: Developing and refining options and assessing effects
 - Stage C: Prepare the Sustainability Appraisal Report
 - Stage D: Consult on the draft SA Report and the Local Plan
 - Stage E: Adoption and Monitoring

Where we are in the SA/SEA process

1.5 Medway Council has prepared a Scoping report as the first step, Stage A in the Sustainability Appraisal process in support of the Local Plan preparation. The Council is now consulting on the Regulation 18 'Development Options' Local Plan, which

progresses the Issues & Options document. It is accompanied by this Interim Sustainability Appraisal Report (Stage B).

Findings of the interim Sustainability Appraisal

1.6 In general, without the final input from the outstanding evidence base including the Strategic Transport Assessment, the 'Development Options' perform satisfactorily against a number of the Sustainability objectives and identify areas that require further consideration. The policy approaches also tend to fair well against the sustainability objectives, acknowledging that further detailed work and evidence base will inform the detailed policy creation. The SA usefully identifies areas for improvement, additions to strengthen policy approaches and additional complimentary policies to support the approaches.

Consultation

1.7 The SA Scoping and Interim Appraisal reports are published for consultation between the 14th March and 18th April 2017.



2. SUSTAINABILITY APPRAISAL

Introduction

2.1 Strategic Environmental Assessment (SEA) was introduced through EU Directive 2001/42/EC, transposed into English law via the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations'). The requirements of the Sustainability Appraisal and the SEA Directive are a method for ensuring that the principle of Sustainable Development is integrated into the plan making process. SEA seeks to assess the environmental effects of implementing plans or programmes. The requirements of the SEA Regulations are set out below with links to how the SA process has addressed these to date:

Scoping Report

- Outline of contents, main objectives of the plan and relationship with other relevant plans and programmes
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme
- The environmental characteristics likely to be significantly affected
- Any existing environmental problems which are relevant to the plan or programme
- The environmental protection objectives, established at international, community or member state level which are relevant to the plan or programme

Interim Sustainability Appraisal

- The likely significant effects on the environment. These should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects
- The measure envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme
- An outline for the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken
- A description of the measures envisaged concerning monitoring n accordance with Article 10
- A non-technical summary of the information provided under the above headings



- 2.2 Sustainability Appraisal was introduced through the Planning and Compulsory Purchase Act, 2004. This process seeks to integrate social and economic as well as environmental considerations into the assessment of plans and programmes. Government Guidance requires that SA and SEA are combined to allow for a single appraisal to be carried out.
- 2.3 The Council is legally required to undertake a Sustainability Appraisal of the Local Plan to ensure to that social, economic and environmental considerations are integrated into the plan making process. The Sustainability Appraisal must be prepared in a manner that meets the SEA Directive 2001/42/EC, which was transposed into UK Law via the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.4 There are two main outputs of the SA/SEA a 'Scoping Report' and an 'Environmental Report'. The SA/SEA process comprises a number of stages, with Scoping (the 'information gathering stage') being Stage A and developing and refining options being Stage B.

Where we are in the SA/SEA process

- 2.5 The SA/SEA of the Local Plan began during the preparation and consultation of the Issues & Options Local Plan. The Issues & Options version was consulted upon in January/February 2016. This process helped to invite comment on issues within the Authority and effectively provided verification of the context and baseline to set the SA framework and objectives within the Scoping report. Medway Council has prepared a Scoping report as the first step (*Stage A*) in the Sustainability Appraisal process in support of the Local Plan preparation and can be found on the Council's website (http://www.medway.gov.uk/planningandbuilding/planningpolicy/localplan-futuremedway.aspx). It provides a context and establishes the range and level of detail for the SA. Policies in the Local Plan will be subject to a Sustainability Appraisal at each stage of preparation to ensure the most sustainable approach has been identified and pursued. Medway Council provides the opportunity to comment on the SA scoping report together with the interim SA.
- 2.6 Medway Council is now consulting on the Regulation 18 'Development Options' Local Plan, which progresses the Issues & Options document and is supported by an Interim SA *(Stage B).* It does this by presenting policy approaches to the issues identified and explores the development options for growth in greater detail to understand the appropriate locations for growth with sustainability at the heart of these considerations. At this stage it is imperative to make clear that the consideration of 'development options' is done so at a strategic level. To aid discussion and the exploration of alternatives, officers have provided indicative development

components of the potential strategic locations for development. The development quanta referred to at this stage are indicative and further work and refinement is required. In addition the outstanding evidence base needs to be concluded and the findings used to inform detailed policies and 'development options' in the Pre-Submission version of the Local Plan.



2.7 The Authority has commissioned a Strategic Transport Assessment, which includes the consideration of Air Quality Management Areas (AQMAs). Transport infrastructure and air quality are increasing in importance in the planning agenda and therefore fundamental to the sustainability considerations. Macro level findings have been

provided to the Council with micro level findings anticipated for the spring/summer. These will be fed into the consideration of development options and inform the detailed policies. A refresh of the retail and commercial leisure study, which will respond to the development options, may be required with a further update on the authority's Landscape Character Assessment and preparation of a Green Infrastructure Strategy. The SA process is an iterative piece of work, which together with other processes and requirements will inform the preferred strategy for growth in the Authority. Findings of the outstanding evidence together with comments received on the SA scoping and interim SA will therefore help refine the SA framework and shape the Pre-submission version of the Local Plan.

2.8 The SA process for the Council's growth strategy dates back beyond the Local Plan Issues & Options document. A SA process supported the preparation of a draft Core Strategy that was withdrawn from Examination in 2013. There are some common policy areas and approaches that were considered through the previous SA process. The Core Strategy SA assessment therefore has some context regarding the consideration of policy approaches, policies and locations for growth.

Habitats Regulation Assessment (HRA)

- 2.9 Land use plans, including Local Plans, are subject to a Habitats Regulations Assessment (HRA) article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive). The HRA assesses the impacts of the proposed land use plan against the conservation objectives of a European Site and ascertain whether it would adversely affect the integrity of that site. The HRA for Medway Council has been undertaken alongside the preparation of the Local Plan, the findings of which are set out in the following paragraphs.
- 2.10 Medway has extensive areas of estuarine landscapes designated as Special Protection Areas, around the Medway, Thames and Swale estuary and marshes. The HRA has also considered potential impacts on the Special Areas of Conservation in and close to Medway at the North Downs Woodland, Peters Pit and Queendown Warren. The screening of the draft policy approaches and potential development options identifies that there is the potential for impacts on the features of the SPAs and SACs arising from disturbance from noise and light pollution and water and air resources.

Consultation

2.11 Consultation on the scope and the interim SA Report will be undertaken with the statutory environmental consultation bodies: Natural England, Historic England and

the Environment Agency. As set out in the SEA Regulations responses should be made within five weeks.

- 2.12 Relevant stakeholders and consultees will have an opportunity to comment on the Scoping and Interim SA reports to ensure the scope and level of detail is appropriate and fit for purpose). The Duty to Cooperate Scoping report will be consulted upon concurrently.
- 2.13 The comments received will guide the refinement of both documents in support of the Local Plan. The Sustainability Appraisal Scoping framework is the basis for appraising the Local Plan policy options going forward. The refined Duty to Cooperate Report will evolve and serve as an audit trail and mechanism to facilitate discussion on strategic cross-boundary issues.

Structure of the report

2.14 Having set out the background to the Interim Sustainability Appraisals, the following chapters are structured according to the process for preparing the Interim Sustainability Appraisal report:

- Chapter 3: Interim Sustainability Appraisal
- Chapter 4: Assessing likely impacts and developing alternatives

3. INTERIM SUSTAINABILITY APPRAISAL

3.1 This interim SA report sets out the objectives and potential options for addressing the local issues contained in the Local Plan and SA scoping report. Table 1 provides the overview of the SA objectives compliance with the SEA Directive topics and categories. Table 2 sets out the SA framework with SA objectives, decision-aiding questions and indicators listed.

Category	Торіс	Objectives			
	Education and Skills	1: To improve skill levels and encourage			
	Transportation and Accessibility	suitable employment opportunities in			
Economic	Economy, Enterprise and Employment	accessible locations.			
ouo	Economy, Enterprise and Employment	2: To have a successful economic base able			
Ecc	Transportation and Accessibility	to sustain economic growth and competitiveness			
	Economy, Enterprise and Employment	3: To protect and support the growth, vitality			
	Landscape, Natural Heritage and Open Space	and viability of the Boroughs centres			
	Landscape, Natural Heritage and Open Space	4: Conserve and enhance the existing green			
	Biodiversity, Ecosystems and Designated	network			
	Sites				
	Climate Change	5: To reduce our contribution to the impacts			
	Air Quality and Environmental Pollution	of climate change			
a	Waste Management				
ent	Climate Change	6: To adapt and mitigate the impacts of			
Environmental	Biodiversity, Ecosystems and Designated Sites	climate change			
nvi	Design Quality				
Ē	Water Environment				
	Historic Environment and Archaeology	7: Promoting, enhancing and respecting our			
	Design Quality	historic/cultural heritage assets			
	Material Assets, Minerals and Resources	8: Making the best use of natural assets			
	Water environment				
	Landscape, Natural Heritage and Open Space				
	Healthy and Safe Communities	9: To facilitate the improved health and			
	Landscape, Natural Heritage and Open Space	wellbeing of the Boroughs residents			
_	Social Inclusion and Equality	10: Promote strong and inclusive communities			
Social	Healthy and Safe Communities				
So	Transportation and Accessibility				
	Population and Housing	11: To provide sufficient and affordable housing suitable to peoples lifestyles and needs			

Table 1: SA objectives consistent with national guidance topics and categories



SEA Objective	Decision Aiding Questions	Indicators			
1: To improve skill levels and encourage suitable employment opportunities in accessible locations.	 Will it meet the employment needs of local people? Will it improve physical access to jobs through improved location of sites and proximity to transport links? Will it reduce poverty and unemployment through provision of jobs and business? Will it improve skills? 	 Job density Employment rate JSA claimant rate Adult NVQ level qualifications Employment by occupation The percentage of 16-18 year olds who are not in employment, education or training (Council Plan) ONS data on travel to work 			
2: To have a successful economic base able to sustain economic growth and competitiveness	 Will it improve efficiency, competitiveness, vitality and adaptability of the local economy? Will it enhance the attractiveness of Medway and raise its profile? Increase the number of businesses in the District? Encourage or enable inward investment and promote future prosperity Will it promote investment in future prosperity? 	 Number of businesses employment by sector Amount and type of completed employment floor space GVA per head value of tourism to the economy 			
3: To protect and support the growth, vitality and viability of the Borough's centres	 Will it enhance the vitality and viability of the town centres? Will it create a strong retail circuit across the Medway towns? Will it maintain the Medway town centres role in providing the services required by users and serving their needs effectively?? 	 Retail completions in Town Centres Vacancy rates - discuss with TC managers No. of non town centre retail permissions/refusal Amount of visits to tourist attractions Amount of overnight stays 			
4: Conserve and enhance the existing green network	 Will it protect, conserve or enhance the green infrastructure network? Will it protect and enhance the environmental designations? Will it contribute positively to the green infrastructure network, the Authority's established high quality landscapes and biodiverse habitats? Does it result in the creation of more open space 	 Open space managed to green flag award standard No of pp that secured S106 agreements for the provision of new and enhanced open space, allotments Number of PROW approved PROW improvement plan Satisfaction with open space (Council plan) 			

Table 2: Sustainability Framework



SEA Objective	Decision Aiding Questions	Indicators
	 including allotments, parks, gardens etc.? Does it create opportunities to link to and create a green infrastructure network? Will it improve access to green spaces? 	
5: To reduce our contribution to the impacts of climate change	 Will it encourage reduced waste production and increase recycling? Will it minimise air pollution? Will it minimise noise pollution? Will it minimise pollution/contamination? Does it encourage the use of sustainable modes of transport? Does it reduce the need to travel by car? Will it lead to minimal impacts on the strategic road network? Will it improve accessibility to services, facilities and conveniences for residents 	 BV102 NI 177 Local bus and light rail passenger journeys originating in the authority area TMRS8 To increase walking bus participants in partnership with KM Walk to school charity NI 192 Percentage of household waste sent for reuse, recycling and composting NI 191 Residual household waste - kg per household NO2 measure – air quality indicators Noise pollution indicators Provision and use of walking and cycle ways
6: To adapt and mitigate the impacts of climate change	 Will it reduce water stress in the area? Will the proposed development protect and/or enhance networks of biodiversity? Will it create opportunities for the allocation of allotments Would development increase flood risk elsewhere? If located within an area of flood risk, have appropriate flood mitigation measures been provided without creating impacts further downstream, Has the development been designed to mitigate or adapt to the impacts of climate change (energy efficiency, renewable energy, water stress, code for sustainable homes)? 	 Number of developments incorporating SUDs Amount of grazing marshland affected by rising flood levels/flood zones Amount of open space and allotment provision Quality of biodiverse areas - designated (for consistent information) and undesignated where information is available to demonstrate an increase in biodiverse areas and quality of these areas. Number of renewable energy/energy efficient applications - trend. Solar farms Areas of water stress
7: Promoting, enhancing and respecting our historic/cultural heritage assets	 Will it encourage tourism and enhance the leisure offer Will it protect the Authority's conservation areas, 	 Number of visitors to historic assets and cultural events Heritage assets - number of planning applications



SEA Objective	Decision Aiding Questions	Indicators			
	 listed buildings, cultural and heritage assets? Will it protect and enhance the Authority's historic and cultural heritage assets and conservation areas? 	designed around heritage assets 3. Number of planning applications refused or approved with design considerations around heritage assets and listed buildings etc.			
8: Making the best use of natural assets	 Does it bring previously contaminated land back into use? Does it protect and/or improve on the quality of agricultural land? Does it protect and/or improve on land of good quality landscape value? Does it make use best use of previously developed land? Would it affect the ability to extract minerals? Explores the potential of assets to be used for wider benefit without compromising environmental objectives. 	 Amount of planning applications and approvals on PDL and non PDL. Number of developments built on remediated land (environmental health?) Number of applications, approvals and refusals on agricultural land 			
9: To facilitate the improved health and wellbeing of the Boroughs residents	 Will it enable residents to enjoy a better quality of life? Will it improve access to services and facilities? Will it encourage a healthier lifestyle and thereby improve the health of residents? Will it contribute toward the reduction in social inequalities? 	 Provision of sports facilities, gyms, open space, cycle paths Early deaths – heart disease & stroke, cancer Standardised Mortality Rate, Medway JNSA, DfH, ONS 			
10: Promote strong and inclusive communities	 Will it assist in tackling deprivation? Will it provide residents with opportunities to become actively involved in their local community, leading to more socially connected neighbourhoods? Reduce levels of crime Will it ensure high degrees of accessibility reducing the need for car dependency Will it increase access to supply of various housing 	 Population on main out-of-work benefits Economic activity (%) Number/% of recorded offences and type of offences provision of sports provision, open space, cycle paths provision of housing Passenger journeys on local bus services 			



SEA Objective	Decision Aiding Questions	Indicators			
	 types Will it increase levels of economic activity Will it contribute toward improving health and life expectancy 				
11: To provide sufficient and affordable housing suitable to people's lifestyles and needs	 Is it able to contribute toward meeting the development needs of the area Will it provide a sufficient supply of affordable units to meet a growing housing need? Will it provide a variety of housing types to meet varying accommodation needs? Will it provide flexible accommodation for all life stages? Will it support the delivery of housing 	 Delivery of annual net additional dwellings Housing by type - affordable housing as percentage of housing delivery Property prices Housing affordability - Ratio of median house price to median earnings Repossessions Number of people on the housing register VS no of HHs in temp accommodation. 			



Strategic Development Options and Policy Approaches

- 3.2 Each development option or policy approach that is presented in the Local Plan will be considered against each of the SA objectives. This is undertaken by the appraisal team and will be informed by the baseline data and evidence gathered as part of the Scoping Report. It will also be informed by expert judgement from various technical specialists including key stakeholders and consultees. These policies will likely form the key development control policy.
- 3.3 The SA framework methodology will be used for the determination of likely significant effects in relation to the following aspects of the Local Plan:
 - Assessment of Alternatives (Development Options)
 - Development Management Policies

Assessment Framework (table 2)

- 3.4 The SA framework matrix gives an example of how the local authority will assess the alternatives, development management policies and the land allocations in relation to the SEA Objectives. It is important that the framework can be adjusted or flexible to match the requirements. For example the site-specific allocations may have different indicators for wide scale policies or alternatives.
- 3.5 Each development option or policy approach in the local plan will be assessed against each of the SEA objectives. The following scoring matrix indicates the scoring for the assessment.

Кеу	Effect
++	Likely to have significant positive effects
+	Likely to have positive effects
0	Neutral
?	Uncertain/insufficient evidence or information available
-	Likely to have negative effects
	Likely to have significant negative effects



4. ASSESSING IMPACT AND DEVELOPING ALTERNATIVES

Introduction

4.1 Before assessing each development option or policy approach it is necessary to assess the Local Plan objectives against the Sustainability Objectives to ascertain consistency and strength of the framework. The objectives of the Local Plan sets out what the plan aims to achieve by addressing the local issues. These are the objectives with sub-order objectives, all of which will be assessed against the SA framework:

Table 3: Local Plan Objectives

	1. To boost the performance of the local economy by supporting local businesses to grow and attracting inward investment through the provision of good quality employment land that meets
	the needs of businesses, and to secure and extend higher value employment opportunities;
	2. To significantly improve the skills of the local workforce;
	3. To ensure Medway's recognition as a University city and realise economic and place-making
A place that works well	opportunities associated with the learning cluster of higher and further education providers in
works well	Medway;
	4. To deliver the infrastructure needed for business growth, to provide accessible employment
	locations, and excellent high speed broadband services;
	5. To strengthen the transport network providing safe and effective choices for travel, including
	management of the highways network, enhanced public transport systems, and improved
	opportunities for walking and cycling.
	6. To secure a strong green infrastructure network that protects the assets of the natural and
A riverside	historic environments in urban and rural Medway, and informs the design and sustainability of
city connected to	new development. 7. To address the challenges of climate change, seeking opportunities to promote carbon
its natural	reduction and mitigation measures, and reduce the risk of flooding;
surroundings	8. To ensure the effective management of natural resources, including the sustainable supply of
	minerals and appropriate management of waste.
	9. To reduce inequalities in health by promoting opportunities for increasing physical activity,
	through walking, cycling, parks and other recreation facilities, and improving access to healthy
Medway	food choices; and to reduce social isolation by supporting retention and development of local
recognised for	services and dementia friendly environments;
its quality of	10. To provide for the housing needs of Medway's communities, that meets the range of size, type
life	and affordability the area needs; 11. To strengthen the role of Medway's town, neighbourhood and village centres, securing a
	range of accessible services and facilities for local communities, and opportunities for homes and
	jobs.
	12. To deliver sustainable development, meeting the needs of Medway's communities, respecting
	the natural and historic environment, and directing growth to the most suitable locations that can
	enhance Medway's economic, social and environmental characteristics;
Ambitious in attracting	13. To secure the ongoing benefits of Medway's regeneration, making the best use of brownfield
investment	land, and bringing forward the transformation of the waterfront and town centre sites for quality
and successful	mixed use development, a focus for cultural activities;
	14. To establish quality design in all new development, respecting the character of the local
in place	
in place- making	environment and seeking opportunities to boost quality and improve the accessibility and design
	environment and seeking opportunities to boost quality and improve the accessibility and design of the public realm;
-	environment and seeking opportunities to boost quality and improve the accessibility and design



4.2 The plan objectives are tested against the SA objectives in the table below:

Table 4: Testing the plan objectives

	SA 1 : To improve skill levels and encourage suitable employment opportunities in accessible locations.	SA 2 : To have a successful economic base able to sustain economic growth and competitiveness	SA 3 : To protect and support the growth, vitality and viability of the Boroughs centres	SA 4: Conserve and enhance the existing green network	SA 5 : To reduce our contribution to the impacts of climate change	SA 6 : To adapt and mitigate the impacts of climate change	SA 7 : Promoting, enhancing and respecting our historic/cultural heritage assets	SA 8: Making the best use of natural assets	SA 9 : To facilitate the improved health and wellbeing of the Boroughs residents	SA 10: Promote strong and inclusive communities	SA 11 : To provide sufficient and affordable housing suitable to peoples lifestyles and needs
1				?	?	?	?	?			
2											
3											
4				?		?		?			
5								?			
6											
7		?									
8											
9											
10				?	?	?	?	?			
11											
12											
13						?	?				
14				2	2						
15				?	?						
Кеу		Positiv relatio			Neutra relatio			Negati relatio		?	Uncertain relationship

4.3 The Local Plan objectives would produce largely positive effects or would have neutral impacts (amber). There are a few uncertainties where development potential could adversely impact or comprising the integrity of the natural and historic environment. The Local Plan objectives provide a strong framework to support sustainable

15

development in the authority with the support of more detailed policies to make clear the overriding objectives.

Development Options and Reasonable Alternatives

Development Options

- 4.4 This section considers how the council has identified initial broad options for Medway's growth, and what potential impacts could result from the different approaches to development.
- 4.5 In preparing the new Local Plan for Medway, the council is seeking to meet the development needed by its communities, whilst protecting and enhancing the area's natural and historic environment. Early stages of this work have included determining the development needs for housing, employment and retail land; and assessing what land may be available and appropriate to contribute positively to Medway's growth up to 2035.
- 4.6 Medway's population has grown rapidly in recent years and this pattern is reflected in the demographic projections that form the basis of the development needs assessment. These show the area growing by c 20% over 20 years, and marked changes in the profile of local communities, such as an increased proportion of older people. The emerging evidence base for the Local Plan identifies a number of weaknesses and inequalities in Medway's economy, environment and communities. The Local Plan aspires to strengthen the area's economy, support strong and healthy communities, and protect and enhance the environment, through providing opportunities to address current weaknesses.
- 4.7 The substantial scale of growth projected up to 2035 and the issues identified for improvement, demand that the council look widely at all possible options to meet development needs.

Identifying development options and approaches

- 4.8 The council commissioned a Strategic Housing and Economic Needs Assessment with Gravesham Borough Council to establish an evidence base for the development needed to meet Medway's growth over the plan period. This established a need over the plan period (2012-2035) for:
 - 29, 463 homes
 - c. 89 hectares of employment land

34,900 m² of comparison retail space and 10,500 m² of convenience retail space (up to 2031)

- 4.9 Work on infrastructure planning to address existing deficiencies and emerging needs from additional development has identified a requirement for a number of new secondary and primary schools, health facilities, transport investments, parks and open spaces, and community facilities.
- 4.10 Work in considering development needs has been carried out in the context of analysing the potential capacity for Medway to accommodate this scale and mix of growth over the plan period. This land assessment process has recognised the complex character of Medway. The borough includes a large urban area of c 250,000 people to the south, and extensive rural areas on the Hoo Peninsula and in the Kent Downs. Much of the undeveloped land is designated of special importance for its environmental features. This is particularly significant in the estuarine landscapes bordering the Medway and Thames, designated as Special Protection Areas, and wider Sites of Special Scientific Interest. Further details on the area's environmental characteristics are set out in the baseline supporting this document. The eastern part of the London Metropolitan Green Belt covers the western edge of Medway, bordering the urban area of Strood. There are also large areas of the best and most versatile agricultural land on the Hoo Peninsula and areas around Rainham. A number of locations lying close to the river and estuary are at high risk of flooding and other areas are prone to surface water flooding. The transport network reflects historic growth around the river and A2, and the topography of valleys and ridges. Much of the urban traffic is routed along the A2, which is subject to congestion and Air Quality Management Areas have been designated along this key corridor. Four junctions on the M2 motorway are located in, or close to Medway, and these are key access points for residents and businesses onto the strategic road network, but often experience issues of congestion.
- 4.11 The council recognises that a number of these characteristics present considerations that may restrict development, in line with national planning policy.

Identifying potential development locations

- 4.12 The council carried out a Strategic Land Availability Assessment (SLAA) to identify what land may be available and suitable for development, as a core component of the Local Plan evidence base. This updated information on land availability, as a number of land owners and developers submitted details of sites that they considered suitable for development.
- 4.13 In assessing the potential of land available for development in preparing the SLAA, the council noted a range of environmental and infrastructure constraints that prevented sites being considered as suitable for development. This assessment is set out in the SLAA documents in 2015 and 2017. There is a significant shortfall between the level of

development needed by Medway's growing communities, and the land currently considered to be suitable and available.

4.14 A central task of the Local Plan is to consider how to balance the need to plan positively for sustainable growth, with protection of the area's environment and avoiding unacceptable pressure on infrastructure and services. The council has referred to information provided on potential land availability together with an assessment of constraints to development to identify broad approaches and locations that could contribute towards meeting the strategic objectives for Medway's growth.

Approaches to meeting development needs

- 4.15 A key consideration in the preparation of development options has been the shortfall between the objectively assessed need for housing and land that is identified in the 'pipeline' for residential development. The SLAA published in February 2017 identifies a 'pipeline' of over 13,500 residential units. Over 2000 homes have been built since the start of the plan period. This means that there is a considerable shortfall in identified sites to meet the scale of development needs for c 29,500 homes over the plan period. In considering further land that may be suitable to allocate for development in the new Local Plan, priority has been given to the use of brownfield land. This is consistent with national planning policy that seeks to make the best use of previously developed land. The council reviewed potential sites in its Brownfield Land Register, development briefs, planning records and sites submitted through the SLAA process. The review of previously developed land provided an indication of potential development capacity and mix.
- 4.16 The council has considered the inclusion of land designated as a SSSI at Lodge Hill in this context. This is based on the extent of Previously Developed Land on the potential development site, and the council's view that a satisfactory mitigation and compensation package could be implemented. The potential development of Lodge Hill is included in all development options. The council acknowledges the uncertainty of the planning status of the site and that the Secretary of State may not support development of the site due to its environmental interests. The status of Lodge Hill is considered further below.
- 4.17 The council is at an early stage of preparing a development strategy for Medway. The scale of projected growth presents challenges for the area in identifying land for homes, jobs and services to meet the needs of the growing and changing population. The decision on a preferred development strategy will have wide ranging impacts for the area and local people and businesses. The council seeks to engage people, organisations and businesses with diverse views and interests in the process of determining the shape of future Medway.

18

- 4.18 The council has given comprehensive consideration to all possible options for the Local Plan development strategy. In assessing potential broad locations and approaches to growth, the council has included some land not currently identified as available for development. These potential components of development reflect:
 - opportunities identified in development briefs and masterplans for regeneration in urban areas, which may not be actively promoted by landowners;
 - development monitoring records held by the council;
 - urban and village boundary reviews;
 - and any further areas with the potential for sustainable development.
- 4.19 The broad locations outlined in the scenarios also include some sites not found to be 'suitable' for development in the latest Strategic Land Availability Assessment. The process reviewed land that had been submitted from the 'Call for Sites' for assessment through the SLAA. It was viewed that some current constraints to sustainable development such as lack of infrastructure could be addressed and mitigated through the design of strategic development options. Other constraints may need to be assessed in the wider context of establishing a balance of planning considerations.
- 4.20 This resulted in a range of broad locations, including SLAA sites, boundary reviews and regeneration areas being identified in urban, suburban and rural locations. Some of these potential locations conflicted with identified development constraints, such as areas of the best and most versatile agricultural land, Green Belt designations, or wider environmental value. Medway is a heavily constrained area, and decisions on the preferred development strategy that will form the basis of the new Local Plan need to be informed by a robust and comprehensive assessment of all options, open to wider stakeholder input. This initial work and consultation on development options will provide evidence to determine where development should be restricted and which areas would be suitable for sustainable growth.

Broad Location Scenarios

- 4.21 Officers assessed the potential broad locations and approaches in the context of the draft Local Plan objectives for sustainable development. This resulted in four different scenarios for how growth could be accommodated in Medway over the plan period. The scenarios are informed by the review of potential development land, as well as alternative approaches that could be taken to Medway's growth. These are shaped around four broad scenarios set out in the Development Options document:
 - Maximising the potential of urban regeneration extending the ambitions of existing programmes to deliver further growth in waterfront and centre sites

- Suburban expansion –using the existing urban pattern to build outwards, reflecting land availability in these areas
- A rural focus –expanding villages, reflecting land availability and scope to improve the range of opportunities in rural areas
- Urban regeneration and a rural town this brings together different components of the first three options to include elements of expanding regeneration plans, some suburban expansion and the growth of Hoo as a small rural town.
- 4.22 Each scenario considers the potential for some development taking place across different localities in the borough, contributing to meeting the mix of development needed. The scenarios represent an early stage of work in assessing the most sustainable strategy for managing Medway's growth, and are therefore presented as strategic level approaches. The Development Options document does not present a 'preferred option', and the council welcomes comments and proposals for additional approaches over the plan period. The four scenarios represent potential broad approaches to planning Medway's growth. They are not specific on development sites or tested in detail at this stage. They form a basis for considering and discussing what development approaches could deliver the most successful and sustainable growth in Medway. They seek to test how different approaches could meet the objectives set for Medway's sustainable growth in the emerging Local Plan. Further work is needed to assess the possible components of these scenarios, including:
 - the availability of land;
 - if development could be delivered within the timescale of the Local Plan;
 - the environmental, social and economic impacts arising from potential development;
 - the scale and mix of development, including associated infrastructure, that could take place;
 - phasing of development and any key infrastructure dependencies;
 - viability of proposals; and

• • • • • • • • •

- implications of wider strategic developments.
- 4.23 Initial work in assessing potential development capacity and infrastructure requirements was carried out for the four scenarios. This allowed a high level assessment of how the broad development locations may contribute to or detract from the economic, social and environmental components of sustainable development. This has informed the findings of the initial Sustainability Appraisal set out in this document.

Lodge Hill

4.24 Lodge Hill has been considered as a potential location that could meet some of Medway's development needs over the plan period. The former military site at Lodge Hill, Chattenden, on the Hoo Peninsula was identified in the mid 1990s as a potential development site in regional planning guidance. Subsequent planning and regeneration policies and programmes have included reference to Lodge Hill in potentially contributing to the development needs of north Kent and Medway. The site was included as a component of Medway's development strategy in the draft Medway Core Strategy. In 2011, Land Securities, working on behalf of the Defence Infrastructure Organisation submitted an outline planning application for a major mixed use free standing settlement, including up to:

- 5000 homes
- 36,750 sqm GEA of B1business floorspace
- 7,350 sqm GEA B2 business floorspace
- 3251 sqm GEA A1 convenience retail floorspace
- 2070 sqm GEA comparison retail floorspace (A1, A2, A3, A4, A5)
- secondary school, 3 primary schools
- community facility, healthcare facility, assisted living facility, nursing home
- garden centre, two hotels

A 1.1 A 11 A 11 A 10 A 10 A 10 A 10 A

- water bodies and associated infrastructure works including access, roads, informal and formal open space,
- pedestrian, cyclist and public transport infrastructure, utilities, car and cycle parking.
- 4.25 During the examination of the draft Medway Core Strategy in 2012, new information was presented on the ecology interest of the site, specifically nightingales and grassland. This resulted in the site being designated as an extended Site of Special Scientific Interest (SSSI) in late 2013. The council then withdrew the draft Core Strategy from Examination.
- 4.26 In 2014, Medway Council's Planning Committee gave its support to the outline planning application. This was on the basis that an effective strategy could be secured and implemented to mitigate and compensate for the potential damage to wildlife features on the site. In considering the planning balance of the proposed development, the council recognised the significant contribution that could be made to the social and economic dimensions of sustainable development, and viewed that the environmental interests could be addressed through the mitigation and compensation strategy. The application was referred to the Secretary of State as a departure from the development plan, and he confirmed his decision to 'Call in' the application for determination through a Public Inquiry. The Public Inquiry has been arranged to start in March 2018.
- 4.27 In advance of the outcome of the Public Inquiry, the planning status of Lodge Hill is unclear. The council has included consideration of the site as a potential location in the four development scenarios to contribute to Medway's development needs over the plan period. This reflects the council's support for Lodge Hill as representing

sustainable development, on the basis of an effective mitigation and compensation strategy for the environmental interests being in place. However, it is acknowledged that there is no planning certainty for Lodge Hill, and the site has been shown in the strategic diagrams for the development scenarios in a distinct hatching, to represent the uncertain planning status. The Public Inquiry will determine if the proposed mitigation and compensation strategy is an appropriate planning approach in assessing development on a designated SSSI.

4.28 In the development scenarios that set out broad approaches to a potential planning strategy, Lodge Hill is considered as a potential location for growth, delivering homes, jobs, services and infrastructure. However development is phased in the latter part of the plan period, from 2025. This reflects the timing for the outcome of the Public Inquiry and subsequent work that would be needed to prepare and secure a detailed planning application, establish initial infrastructure works and the mitigation and compensation strategy, before development comes forward. Therefore it would be anticipated that, if approved by the Secretary of State, the development of Lodge Hill would extend beyond the plan period. The quantum of potential development within the plan period reflects this phasing.

Consideration of alternatives to Lodge Hill

- 4.29 If the proposed development of Lodge Hill is not supported by the Secretary of State, the council must consider its response in planning for Medway's growth needs. Potential responses include:
 - Seek to increase development allocations in other areas of Medway this could seek further development in rural, suburban or urban locations. Given the significant scale of growth being considered across Medway, increased allocations could place unacceptable pressures on the environment, local infrastructure and services. Further work would be needed to assess the capacity of broader locations to accommodate increases in development, and to secure delivery.
 - Reduce the development targets in the Local Plan this could decrease the number of homes and employment land in Medway over the plan period. This would impact on the plan's ability to meet development needs, and could contribute towards pressures in accessing housing, and failing to address the plan's objectives to strengthen the local economy.
 - Following the Duty to Cooperate, to make requests to neighbouring areas to meet unmet housing need outside of the borough boundary.

Consideration of development options

1 12 HARA

4.30 This is an early stage of developing a strategy for Medway's growth up to 2035. Using information on land availability, supporting information on development needs and

environmental designations, the council has set out a number of growth scenarios for consultation. These set out broad locations that could be considered under different approaches to development. In shaping these strategic options, the council has considered the potential capacity to deliver land for housing, employment and retail. It has also looked broadly at what infrastructure and services would be needed to address current pressures, as well as the needs of Medway's growing communities. This has allowed an initial assessment to be made on how the development options could contribute towards meeting the social, economic and environmental objectives set for the emerging Local Plan.

- 4.31 The Development Options consultation seeks to gather further information on how the broad locations and approaches could make a positive contribution to growth needs, and where negative impacts would mean that the areas are not suitable for development. The growth scenarios are set out in more detail below.
- 4.32 The options are based on estimates of development capacity of broad locations and sites considered through the Strategic Land Availability Assessment, together with infrastructure requirements. These inform strategic diagrams that illustrate the development approach promoted in the four scenarios. As broad approaches to potential development, the locations and quantum are indicative. At this stage of the Local Plan process, the purpose of the options consultation is to engage a range of stakeholders in considering what would represent the most successful strategy to secure Medway's sustainable growth.



Scenario 1 Maximising the potential of urban regeneration



- 4.33 This approach seeks to achieve the greatest potential from brownfield sites to deliver the development needed in Medway over the plan period. This extends the authority's ambitions for regeneration and aligns with ongoing policy to realise economic and social opportunities in the Thames Estuary growth corridor. The focus of this option is the delivery of a transformed central urban area, linking new waterfront development with revitalised town centres.
- 4.34 Much land, in riverside areas such as Rochester, Strood, Chatham and Gillingham Pier, is at the core of Medway's regeneration plans and form part of the current development pipeline. The currently identified pipeline does not meet the scale of development needed over the plan period. A more radical approach to regeneration would be required to deliver substantial increases in development.
- 4.35 Consideration is therefore given to building at higher densities in sites that do not yet have approved schemes, as well as bringing forward new areas for development. These include the redevelopment of employment sites at Medway City Estate and Chatham Docks for mixed use schemes, opportunities for land assembly in central areas that could support new development, and renewal of residential estates to deliver modern quality housing at higher densities. The regeneration area could extend to a new site at Mill Hill for a modern stadium for Gillingham Football Club, with supporting residential, leisure and retail services. This approach would increase investment in Medway, revitalising the central area, boosting the vitality of the town

24

centres, and supporting new employment activities around town centres, together with purpose designed employment land provision through an extension at Kingsnorth business park on the Hoo Peninsula.

- 4.36 It is recognised that urban regeneration may not deliver the range and mix of development needed by Medway's communities. Therefore it is considered that a proportion of development would also be delivered in suburban and rural areas to complement the urban regeneration offer. This could include development at Lodge Hill, rural villages, or in locations bordering current suburbs.
- 4.37 Key components of this development scenario include:
 - Redevelopment of Medway City Estate and Chatham Docks to mixed uses to deliver new residential quarters, integrated with leisure, retail and employment uses, and supported by provision of community facilities, such as schools, community and health centres, and open spaces. The scale of the sites could offer potential for significant resident development, indicatively 5000 homes within the plan period, in addition to existing plans in these areas. There is capacity for increasing the scale of development to over 8000 homes, should this be supported by a positive development approach, land assembly and infrastructure planning processes.
 - Investments in upgrading access across the central urban area, with a new link or links across the river from the Medway City Estate, and opening up public access to the waterfront areas, and significantly improving public transport links through urban areas. These would form intrinsic components of the masterplanning for new developments, and the wider development strategy promoted by the Local Plan, facilitating movement around Medway and providing a focus to establish a new urban quarter, linked to surrounding historic neighbourhoods.
 - Development at higher density in central and waterfront sites in Chatham and Strood, and using land assembly to achieve further development land in centres. This would extend the scale of development set out in existing plans and development briefs and make use of urban land identified as suitable in land availability assessments carried out by the council. This would involve consideration of development in peripheral areas of town centres, and seek to boost the supply of residential properties in these areas, supported by community services, including schools, community and health facilities. This could deliver up to 4500 homes, including schemes already identified in the development pipeline. Peripheral town centres locations would be promoted as new sites for businesses.
 - Development of a mixed use scheme at Mill Hill, led by Gillingham Football Club, for a new stadium with associated leisure, retail and residential development. This could bring up to 850 new homes in this area. Estate renewal of older properties in Twydall could have the potential for up to 150 new homes, in bringing forward redevelopment over the plan period.

25

- Development at rural and suburban locations in Medway would provide a smaller proportion of the growth needed to support Medway's communities, and offer a wider range and mix of development approaches. Lodge Hill is considered as a potential development site, subject to the outcome of the Public Inquiry, providing land for up to 3000 homes, with supporting infrastructure and services, employment and retail land. Land around Rainham and Capstone, and existing villages could also be considered to meet development needs, of up to 4000 homes, employment and retail land and provision for infrastructure, including transport, community services and open space.
- The large sites at Grain and Kingsnorth are continued to be promoted for employment uses. The potential loss of employment land at Medway City Estate and Chatham Docks would be addressed through the provision of a new business park at Kingsnorth to attract inward investment and make provision for relocating and expanding firms. Further employment land would be integrated into mixed use schemes to provide for a broad offer of sites to meet business needs.
- The scale of growth proposed in the area calls for great care in planning the integration of new development, managing impacts on the wider area, and investing in infrastructure upgrades. Green infrastructure planning is central to this, in considering how to maintain and enhance networks that support wildlife and human health and wellbeing. Green infrastructure planning for wildlife corridors, green travel and landscape quality will be intrinsic to development proposals, particularly in areas that may experience the greatest changes.
- 4.38 This focus on urban regeneration has potential benefits in attracting investment that can boost the local economy and meet social needs and address degraded environments. The transformation of the urban and waterfront areas meets the draft vision and strategic objectives set for Medway's development. There would be good opportunities to provide development in proximity to public transport hubs, and enhanced walking and cycling routes, offering alternatives to car based travel.
- 4.39 However it is recognised that there are challenges associated with the delivery of large scale regeneration schemes, including land assembly, site preparation works and costs, managing the impact on transport networks and the provision of infrastructure and services. This may impact on the viability of some schemes, and reduce the potential to deliver within the plan period. There are existing issues of air quality and congestion in central areas, with a designated central Medway Air Quality Management Area. Concentrating much of the area's growth in the central area could lead to an exacerbation of pollution issues. The potential urban development approaches would need to be managed carefully to avoid a detrimental impact on the historic environment.

Scenario 2 Suburban expansion



- 4.40 This approach considers the potential of the suburban areas to meet the shortfall between development needs and the identified pipeline of sites. It responds to the availability of land being promoted in these locations. This scenario retains a core component of urban regeneration as represented in the development pipeline as part of a balanced planning strategy. However it presents a significant scale of growth being directed to more peripheral suburban locations. There is strong market demand in such locations, and the development sector has indicated the availability of sites across the broad locations lying to the east and north of Rainham, Capstone Valley and around Strood and Frindsbury.
- 4.41 Consideration is given to the potential of sustainable urban extensions around Rainham, Capstone and Strood to complement the urban regeneration taking place in central Medway. These new suburban communities would be planned to coordinate the growth of housing with transport improvements, services and infrastructure, jobs and shops, sensitively designed to strengthen links with existing neighbourhoods and to respond to the distinctive characteristics of the local environment.

- 4.42 A significant issue in this option is the consideration of the review of the Green Belt boundary to bring forward development land. The consultation and ongoing preparation work on the Local Plan will determine if there are the exceptional circumstances that require the release of land in the Green Belt, or if provision for development needs can be met in other areas.
- 4.43 In addition to the suburban expansion and specific urban regeneration opportunities in town centres, waterfront areas and estate renewal, consideration is also given to the potential of development at Lodge Hill, and growth of Hoo St Werburgh and smaller developments in villages.
- 4.44 Key components of this development scenario include:
 - Suburban development around Rainham, Capstone and Strood to deliver sustainable urban extensions. These offer the potential for planning high quality modern suburbs, addressing the needs of Medway's growing and diverse communities. In considering broad locations for growth, the Local Plan could promote new attractive neighbourhoods, well served with services within easy reach, designed to promote walking and cycling as part of healthy and sustainable lifestyles, and supporting new employment opportunities. The scope of development in these broad locations could deliver up to a maximum of 10,700 homes, but the quantum would need to be assessed against environmental and infrastructure capacity, viability testing in addressing infrastructure dependencies and the feasibility of delivery rates onto the market.
 - Given the potential scale of growth that could be allocated in these areas, this
 approach is explicit in achieving a balanced development, where new housing is
 supported by significant investment in infrastructure. This would include upgrades
 to the capacity of transport networks and services; a range of community facilities,
 such as new/extended secondary and primary schools, health care and community
 centres; and enhanced green infrastructure providing quality development and links
 to existing neighbourhoods.
 - New employment and retail land integrated into new developments, as well as investments in Rainham town centre and peripheral sites near Strood and Hempstead that would provide accessible employment sites. In consideration of the development approach, land with good connections to transport networks could offer new employment sites, such as to the west of Strood. The large sites at Grain and Kingsnorth are continued to be promoted for employment uses.
 - Regeneration in waterfront and central urban areas in line with the identified development pipeline and estate renewal of older properties in Twydall for redevelopment over the plan period.
 - Some development in rural locations in Medway would provide a smaller proportion of the growth needed to support Medway's communities. Lodge Hill is considered as

28

a potential development site, subject to the outcome of the Public Inquiry, providing land for up to 3000 homes, with supporting infrastructure and services, employment, retail land and open spaces. The expansion of Hoo St Werburgh is also considered to potentially deliver up to a maximum of 2000 homes, with supporting services, including schools, health and community centres, retail and employment land. Some incremental growth around existing villages could also be considered to meet development needs, with scope to deliver up to 900 homes, but requiring investments in transport, services and open spaces.

- 4.45 This potential development approach offers the opportunity to establish new and expanded neighbourhoods in suburban areas noted for quality design, landscaping and connectivity, promoting residential development integrated with effective and timely delivery of infrastructure. These new neighbourhoods could help meet the needs for retail, services and employment land as part of a balanced development.
- 4.46 However particular care is required to achieve quality development at a scale that could be supported by infrastructure upgrades and the capacity of the local environment, and which does not create an unacceptable negative impact on existing communities. Much of the potential development land in the suburban locations coincides with the distribution of the best and most versatile agricultural land, and therefore this scenario would involve the loss of an important asset and impact upon the farming industry in Medway.
- 4.47 There is a risk that development in peripheral locations in Medway could promote unsustainable travel patterns and detract investment from regeneration of central areas. Such outcomes would undermine the strategic objectives set for the Local Plan and fail to deliver on the ambitions set in the vision for Medway's growth.



Scenario 3 A rural focus



4.48 This scenario considers the potential to direct a higher proportion of growth to the Hoo Peninsula, recognising the potential availability of land, as identified through the Strategic Land Availability Assessment process. The regeneration of urban and waterfront sites is again promoted as a core component of the growth strategy, but consideration is given to the potential of the rural area in contributing to meeting development needs. This approach would represent a significant change to Medway's development pattern, and would require specific actions to upgrade infrastructure in line with growth. The rural area is complex and has a range of landscapes and habitats designated of environmental importance, tracts of the best and most versatile agricultural land, and deposits of minerals. In considering further development in the rural area, great sensitivity is required to address the balance across the social, economic and environmental aspects of sustainable development. The scenario recognises that a proportion of growth beyond the identified development pipeline would be directed to suburban areas and urban sites with the potential for redevelopment.

4.49 Key components of this development scenario include:

- The potential expansion of Hoo St Werburgh into a small rural town, supporting a range of enhanced services, including secondary, primary and nursery schools and health care, jobs and parks. This small town could serve the wider peninsula. The scale of potential development, up to a maximum of 6500 homes would require significant investment in infrastructure and services to meet the needs of an increased population. However such a significant level of growth would also need investment in higher level services, retail and employment offers, to establish the effective function of a town. Specific provision would be made for countryside and open space resources within the context of a planned rural town. A rural town based around Hoo St Werburgh, could deliver:
 - 6500 homes
 - Investment in transport

- A new retail centre and employment land
- A secondary school , nursery school and 5 primary schools
- Community facilities, including a Healthy Living Centre, library and community centre
- Open space including play areas and local amenity greenspaces, and two country parks around the Saxon Shore Way and Deangate.
- Lodge Hill is recognised as a potential development location, subject to the outcome
 of the Public Inquiry scheduled for 2018. If the development of the site is supported
 by the Secretary of State, planning would be coordinated with the growth of Hoo St
 Werburgh to achieve complementary and sustainable growth. Lodge Hill is considered
 to have the potential to provide land for up to 3000 homes, with supporting
 infrastructure and services, including schools, health and community facilities, retail
 land and open spaces and country park, within the plan period.
- Consideration is given to further growth of villages on the Hoo Peninsula with a range
 of services and facilities that could support an increased population. There is the
 potential supply of available land to deliver more than 2500 homes, but more specific
 assessment of the capacity and sustainability of villages is required to establish the
 potential for residential growth, infrastructure needs, and the distribution of potential
 growth. There is an opportunity to strengthen the sustainability of villages, through
 boosting the provision of services and facilities and increasing the supply of homes in
 these areas. Particular attention would be required to the resourcing of new schools,
 health and community facilities, parks and extending opportunities for retail and
 employment land.
- Development at such a significant scale in the rural area would change the character of existing villages. The planning of green infrastructure is central to this potential development approach. Care is needed to retain a distinct rural character, and to prevent coalescence of expanded villages on the Hoo Peninsula with urban Medway.

Strategic landscape buffers performing strong multi-functional environmental functions are core elements of this scenario. The provision of country parks and open space, and the sensitive treatment of village boundaries are key components.

- It is recognised that the scale of growth considered in this scenario would require significant investment in infrastructure, critically transport, such as increased capacity at the Four Elms roundabout, key routes, and the public transport network, provision for walking and cycling; together with wider social and environmental services, including utilities.
- Suburban and wider rural development could also provide for a choice of sites, at a smaller scale than potentially considered on the Hoo Peninsula. This could include some development around Rainham and the Capstone Valley areas to deliver up to 2280 homes, a new secondary school at Hempstead, and primary schools, community facilities including health services, community centre and library provision; parks and open spaces. The construction of a new stadium for Gillingham Football Club could provide associated development for up to 850 homes, retail and leisure facilities. There may be modest scope for further development in the Medway Valley for up to 180 homes, with investment in education, health and community services, transport, and open space.
- 4.50 Development at such a scale in the rural area would offer the potential to improve access to services, facilities and employment opportunities, as well as contributing to the supply of housing. However such development would involve the loss of agricultural land, including potentially some of the best and most versatile resources. Managing development within the context of the wider environment, including landscapes and habitats designated for their ecological interests presents challenges.





Urban regeneration and rural town

- 4.51 This approach brings together components of the urban regeneration, suburban expansion and rural development scenarios. It includes elements of building at higher densities in waterfront and urban centre sites in Chatham and Strood, and seeking opportunities to consolidate development sites in these urban areas and for estate renewal schemes. It acknowledges that land at Medway City Estate and Chatham Docks may take time to come forward for mixed use redevelopment schemes within the plan period, given the complexity of land assembly, relocation of existing business uses, land preparation and infrastructure works and costs.
- 4.52 Suburban expansion is supported to a level that could deliver sustainable and healthy urban extensions, but restricted in scale to manage the risk of urban sprawl and unsustainable travel patterns. In this approach, sufficient land is identified in urban and greenfield sites to avoid the release of land in the Green Belt to the west of Strood.

- 4.53 The development of Hoo St Werburgh into a small rural town and the potential for development at Lodge Hill, subject to the outcome of the Public Inquiry, are supported to deliver homes, in coordination with transport upgrades, improvements in services and facilities, and the delivery of new employment and retail space. Significant green infrastructure investments through new country parks could contribute to securing the distinct character of the peninsula and enhancing public access to the countryside.
- 4.54 The key components of this option include:
 - Urban regeneration including development at Chatham Docks, Medway City Estate, Chatham and Strood waterfront and central areas, Mill Hill, and estate renewal in Tywdall, could deliver up to 6500 homes; new sites for employment, retail and leisure uses; a strengthened role for town centres; and significant investments in transport networks, and wider infrastructure, including secondary and primary schools, health and community centres, and open spaces and public realm.
 - Development in the rural area of the Hoo Peninsula could support the growth of Hoo St Werburgh as a small rural town providing up to a maximum of 6500 homes, supported by transport investment, a new retail centre and employment land, schools, community facilities, including health and community centres, and open space and country parks. Incremental scale of growth in villages could deliver up to 650 homes with supporting services.
 - Lodge Hill, if supported by the outcome of the Public Inquiry, could provide land for up to 3000 homes, schools, community facilities, including health and community centre provision, employment space, retail, leisure and open space and a country park.
 - A smaller scale of suburban expansion could deliver up to 2000 homes at locations near Rainham and Capstone, supported by investments in transport, services and green infrastructure
 - Land for employment and key services, including schools and health. These include the development of the key employment sites at Grain and Kingsnorth, and new sites around the periphery of town centres, in conjunction with development areas, and other accessible locations.
 - Planning for a strong network of green infrastructure, securing corridors and habitats for wildlife and supporting Medway's communities to live healthily.
- 4.55 This scenario offers the potential for growth in urban, rural and suburban areas to provide for a range of development needs. The range of broad locations and sites may help to manage risks in achieving a viable delivery strategy, providing land that could meet short term needs, as well as provision for strategic sites that would be built out over a longer time period. Investment in services, jobs, infrastructure and open spaces would help to address current deficiencies and mitigate the impacts of development.



.

4.56 However the scale of development and the broad locations considered would involve the loss of some of the best and most versatile agricultural land, and potentially impact on designated air quality management areas. The change of character in the rural area with the growth of Hoo St Werburgh would need particular care. All sites would require significant investments in improved infrastructure, notably transport. The scale of investment may impact upon viability and therefore reduce the development potential.

Consideration of reasonable alternatives

- 4.57 The council considers that the four scenarios set out above represent reasonable alternative approaches to meeting Medway's development needs. They consider use of land identified as potentially available for development, an assessment of where there may be opportunities for additional development on brownfield land, and seek to provide the mix of development needed for housing, employment, retail, services and infrastructure, whilst respecting the area's natural and historic environment.
- 4.58 Further alternatives for the development strategy in the Local Plan could include setting a reduced development target, recognising the range of significant constraints, including environmental designations, viability and land assembly issues and infrastructure costs and dependencies. The council acknowledges that setting a lower growth target would fail to meet the objectively assessed development needs of Medway's growing and changing communities. This shortfall could create pressures on surrounding areas, where Medway may seek to meet development needs through use of the Duty to Cooperate in progressing negotiations with neighbouring local planning authorities.
- 4.59 Similarly the Local Plan could seek to deliver a greater quantum of development than identified in baseline evidence. Such a strategy could seek to advance Medway's regeneration and growth ambitions, and contribute to a strengthened economic and retail role. However given the significant constraints to development identified, it is likely that an even greater scale of development could create unacceptable impacts on the environment and infrastructure. The development sector's ability to deliver a higher rate of growth over the plan period within the Medway area is also questioned.

Appraisal of Development Options

4.60 The four scenarios have been assessed against the SA framework and the findings are set out in the tables in the subsequent chapter. Broadly all options are considered to make positive contributions to meeting development needs, specifically for addressing housing needs. However the scale of development, particularly as set out in broad locations is identified as potentially presenting negative impacts upon the

environment, that would need to be carefully managed and mitigated in progressing the Local Plan's selection of development locations. Key concerns relate to achieving sustainable travel, and the potential risks of increasing more car based journeys, contributing to climate change and deterioration of air quality. The findings of the Strategic Transport Assessment will be critical to informing further analysis of development options and determining the most sustainable development strategy in the Medway Local Plan.

Further work on Development Options

- 4.61 The council recognises that further work is required to assess the detailed impact of potential development in the broad locations. A Strategic Transport model will be used to assess the impacts on the highway network of potential development locations. The analysis will consider the capacity of the transport network to accommodate growth at different scales, and any mitigation or development work required. The work will also assess the impact on air quality.
- 4.62 In testing the broad locations and approaches for potential growth, consideration will be given to the capacity of areas to accommodate additional development, if Lodge Hill should not be supported through the Public Inquiry process.
- 4.63 The council will carry out a further review of the potential development sites to provide an updated Sustainability Appraisal of how sites have been assessed, and identify effective mitigation measures to achieve sustainable development.

Policy Approaches

- 4.64 In general, the policy approaches fare well against the SA objectives. It is acknowledged that outstanding evidence base is yet to be concluded, which will inform the development options and detailed policy approaches. The assessment recognises the potential negative impact should the identified issues not be addressed. The exercise was therefore useful in identifying areas for improvement and issues to consider when incorporating the final results of the evidence base in policy development. The assessment also identified how policy approaches could be strengthened and where complementary policies could be off benefit.
- 4.65 The main issue for consideration is the balance that needs to be achieved between environmental conservation and protection and the development (housing, employment) need. The policy approaches need to be very clear going forward.

Monitoring

4.66 Monitoring is important in determining whether the Local Plan is achieving what it set out to through its objectives. The Council produces an annual Authority Monitoring Report (AMR), which reports on the current Local Plan. As part of the new Local Plan, the Council will produce a framework closely aligned to the sustainability Framework where appropriate to ensure that the main objective of achieving sustainable development is achieved. Results of the monitoring will form part of the AMR.

Conclusion

4.67 The Sustainability Appraisal process is an iterative one. Comments received to the Local Plan, SA scoping and Interim SA will be used to further refine the framework and policy and development approaches.

