

Council – Supplementary agenda

A meeting of the Council will be held on:

Date: 12 January 2012

Time: 7.00pm

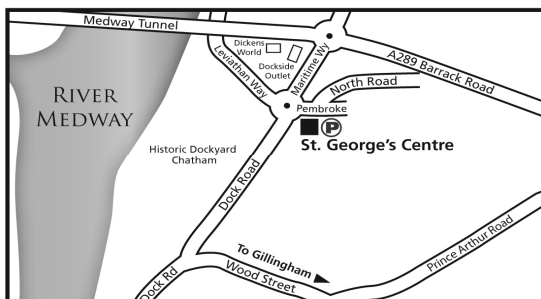
Venue: St George's Centre, Pembroke Road, Chatham Maritime, Chatham
ME4 4UH

Items

- 11 Local Development Framework (Policy Framework) – (Pages 1 - 670)**
Attachments 1-10

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Date: 4 January 2012



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ATTACHMENT 1



**MEDWAY LOCAL DEVELOPMENT
FRAMEWORK**

SUBMISSION DRAFT CORE STRATEGY

[CABINET VERSION]

DECEMBER 2011



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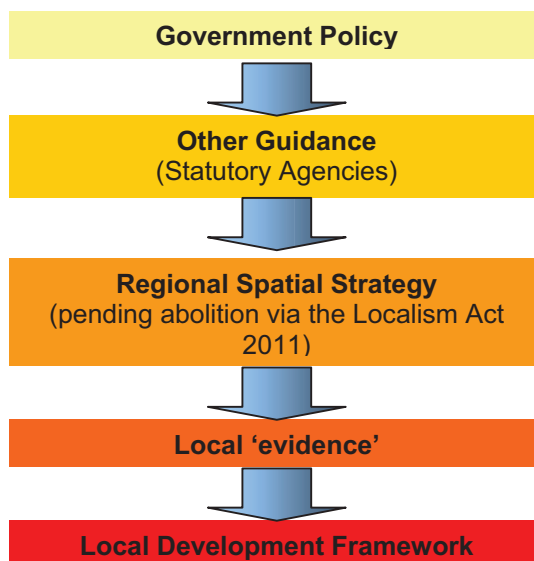
1. Introduction

- 1.1 This is the third draft of a new Core Strategy that will form the major part of what is called the Local Development Framework (LDF) for Medway.
- 1.2 It sets out how the Council sees Medway developing over the period up to 2028 and it will, when adopted, guide all major development decisions and investment plans.
- 1.3 It covers many issues but at its heart it is about fully realising Medway's enormous potential and completing the immense regeneration programme that started over 10 years ago. It sets out how Chatham will develop into a centre of regional significance, how deprivation will be tackled, and how healthier and more sustainable neighbourhoods created and much else.
- 1.4 This is what is known as the "Submission Draft" Core Strategy. Where appropriate, it responds to representations received at the previous 'publication draft' stage and it reflects the most up to date 'evidence' collected to inform the plan.

The Development Plans System

- 1.5 The Planning and Compulsory Purchase Act, 2004 requires each local planning authority (or council) to prepare a Local Development Framework or LDF. This consists of a portfolio of documents rather than a single plan. This is intended to allow it to be kept up to date, as those parts of the plan requiring review or replacement can be changed without the necessity of reviewing the entire plan. The LDF consists of what are called development plan documents, which are subject to public examination by an independent inspector, and supplementary planning documents which are not subject to a formal examination.
- 1.6 The Core Strategy is the main document in this portfolio, setting out an overall vision and strategy for the area and addressing the strategic issues facing it. However it must also be in 'conformity' with national policies and extensive guidance issued by the Government and government agencies such as Natural England, the Environment Agency and the Highways Agency. This is illustrated in the following diagram.

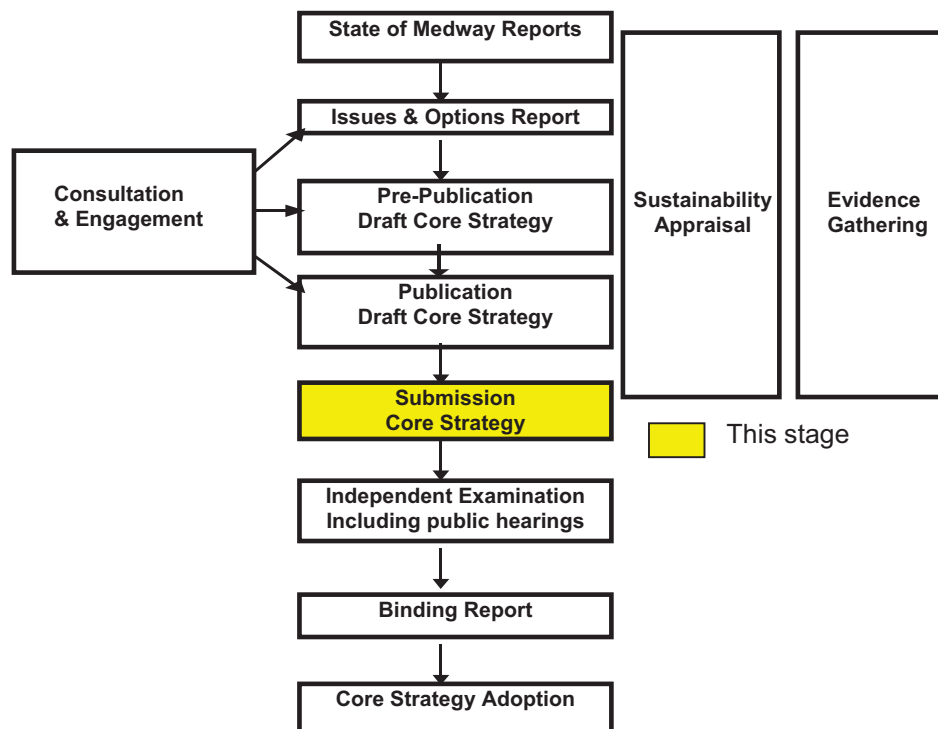
Figure 1-1 The Planning Policy Cascade



The Stage We Have Reached and How We Got There

- 1.7 In getting to this stage a great deal of work has been completed. This has included carrying out a number of surveys, gathering information, preparing what is called the 'evidence base' and engaging with stakeholders and the wider public. A series of State of Medway reports were produced in 2008 (and updated in late 2011) to provide a baseline for subsequent work. In 2009, an Issues and Options report was published.
- 1.8 The Council consulted on the Issues and Options Report during the late summer of 2009. Consideration of all the responses received and continuing evidence gathering led to the 'Pre-Publication' Draft Core Strategy being issued in November 2010. Again all responses received were carefully considered and the 'evidence base' continued to be updated. This was followed by a 'Publication Draft Core Strategy published in August 2011. This was also subject to public consultation. Limited minor changes have been made in response to this, leading to the publication of this 'Submission Draft' Core Strategy.
- 1.9 This will be submitted for an Independent Examination. An Inspector appointed by the Secretary of State for Communities and Local Government will conduct this.
- 1.10 The various stages that we must go through and where we currently are in the process are illustrated in the following diagram.

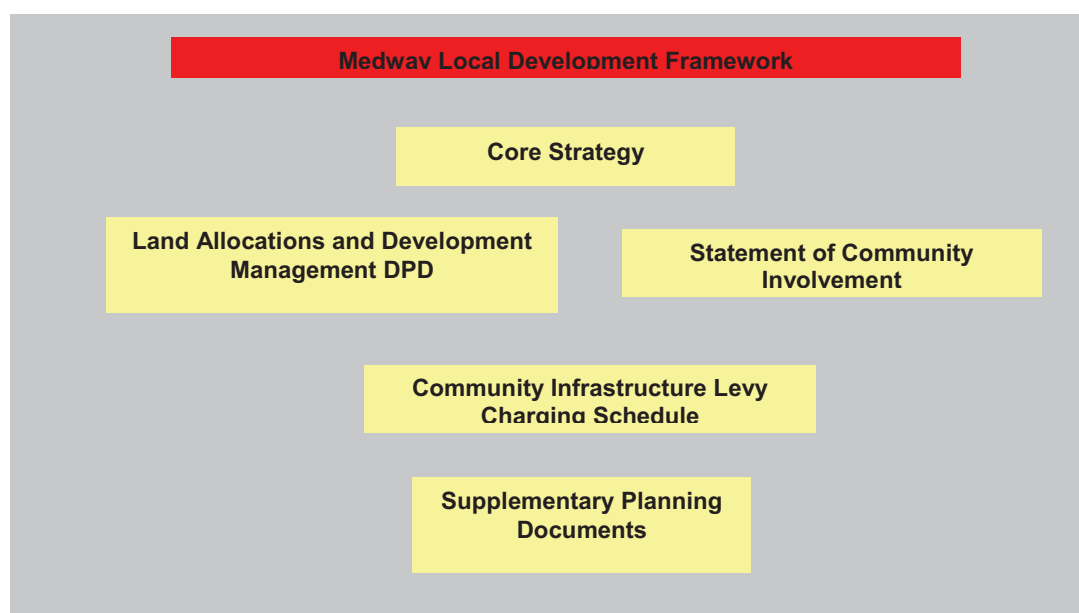
Figure 1-2 Core Strategy Stages



How the Core Strategy Fits Into the LDF

- 1.11 As indicated above the Core Strategy is one of a number of documents that will make up the complete Local Development Framework for Medway. This is illustrated in the diagram below.

Figure 1-3 Medway Local Development Framework



- 1.12 Preparing this new plan for Medway is a considerable undertaking and we are grateful for the help we have received from many organisations and individuals.
- 1.13 The Core Strategy has been prepared at a particularly important time for Medway. It is a time of unprecedented opportunity that, if taken, will unlock Medway's potential. The challenge is to grasp and make the most of these opportunities, while making sure that Medway's renowned natural and historic qualities are nurtured and to help underpin social and economic progress. The current economic climate will undoubtedly make the job more difficult but the opportunities the area presents are becoming ever more widely recognised and there is a collective determination to achieve our full potential.

Structure of the Core Strategy

- 1.14 The document falls into four distinct parts:
- A short analysis of the main issues we need to address and a specific vision and objectives to tackle these together with a 'Key Diagram'
 - Policies covering a range of topics relevant across the area, including housing and the economy
 - A chapter that sets out how these are to be applied at a more local level; and
 - How the policies and proposals are to be implemented, monitored and reviewed.

Sustainability Appraisal

- 1.15 In parallel with the Core Strategy a Sustainability Appraisal (SA), has assessed the likely social, environmental and economic impacts of the strategy. The appraisal tests different approaches to see which might be best when considered against a whole range of sustainability objectives and it helps to choose the best way forward. The Council's approach to SA incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive, which requires strategic environmental appraisal to be undertaken on all plans and programmes with significant impacts.
- 1.16 The final iteration of the Sustainability Appraisal is being published alongside this draft of the Core Strategy and can be accessed via the website: www.medway.gov.uk/ldf.

Habitats Regulation Assessment / Appropriate Assessment

- 1.17 The Core Strategy is also subject to a Habitats Regulation Assessment (HRA), which considers the potential effects on European and Ramsar wildlife sites. A screening and scoping report is available on the website and a full assessment has now been completed.

Timetable for the Core Strategy

- 1.18 The expected timetable leading up to the adoption of the Core Strategy is set out in Table 1-1.

Table 1-1 Core Strategy Timetable

	Stage of Production	Dates
1	Pre-Publication Draft Core Strategy Consultation	November 2010
2	Publication Draft Core Strategy Consultation	August 2011
3	Core Strategy Submission Preparation	January 2012
4	Core Strategy Submission	January 2012
5	Examination Hearings	April 2012
6	Adoption	September 2012

Statement of Community Involvement

- 1.19 The Statement of Community Involvement is part of the Medway Local Development Framework. It sets out how the Council will involve the community in the preparation of local development documents. A first version was prepared in 2006 and this has now been updated. As with all documents relating to the LDF it can be found on the website. This draft of the Core Strategy has been prepared in accordance with that Statement.

Diversity Impact Assessment

- 1.20 In order that everyone should benefit from the regeneration of Medway and to maintain community cohesion it is essential to ensure that all the proposals in this Core Strategy take account of the needs of all communities in Medway particularly the most disadvantaged including the disabled, vulnerable people, ethnic minority communities and carers. A Diversity Impact Assessment has been carried out to ensure that the final document complies with this principle. This determines the impact on residents due to their racial group, gender, disability, sexual orientation, age and religion. The Diversity Impact Assessment builds on the work undertaken for the SEA/SA process and relates to a number of objectives identified through the SA work.
- 1.21 The assessment is available on the website.

Consultation Responses

- 1.22 A statement is being produced setting out those bodies and persons invited to make representations at the various consultation stages, how they were engaged and a summary of the main issues raised and how these have been addressed in the preparation of the Core Strategy. This will be published alongside the Submission Core Strategy. Detailed schedules of all representations received to the Issues and Options report, the Pre-Publication Draft Core Strategy, the 'Publication Draft' Core Strategy and the Council's response to them is also available.

Plan Period

- 1.23 The period covered by a Core Strategy must be at least 15 years from the date it is adopted. This is likely to be in autumn 2012.
- 1.24 Much of the evidence underpinning the Core Strategy is collected annually, beginning on 1 April each year and ending on 31 March. Much national and regional information also relates to 5 year periods: 2001, 2006, 2011, 2016 etc.
- 1.25 Detailed monitoring frequently uses a base date of 2006 and so the plan period chosen for the Core Strategy is 1 April 2006 to 31 March 2028. Going back to 2006 allows recent trends to be fully reflected and 2028 ensures that there will be the required 15 years left to run after adoption. 2028 also broadly corresponds to the anticipated end date for the Thames Gateway project, which is the single most important driver for change in Medway.

Changing Circumstances and Requirements

- 1.26 The Core Strategy is being prepared at a time when changes are being made to the planning system. The Coalition Government intends to abolish Regional Spatial Strategies, the South East Plan in Medway's case, and further changes have been made in the Localism Act 2011. A new National Planning Policy Framework is also being produced and is expected to be issued in April 2012. This will replace a raft of existing guidance but there is uncertainty as to what its final form will be.
- 1.27 Core Strategies have to be in 'conformity' with national policies and the relevant Regional Spatial Strategy. Inevitably this causes some uncertainty but the Council is determined to proceed as quickly as is sensible in taking forward this Core Strategy.
- 1.28 The announcement by the government of its stated intention to abolish Regional Strategies has been ruled by the Courts as a material planning consideration, which could affect the weight attached to the Regional Strategy in underpinning the Core Strategy. Abolition is expected during 2012. Having considered its position, the Council takes the view that a local evidence base has informed the preparation of the Core Strategy, local consultation and sustainability appraisal and that the local context supports the strategy and policies contained in this document. The policies and proposals contained in the Core Strategy are therefore considered to be robust and evidence-based irrespective of the weight to be attached to the South East Plan.
- 1.29 This document contains some references to the South East Plan. Whilst it is likely to be abolished soon references to it are nonetheless retained, since it has been relevant in the preparation of the Plan.

Flexibility and Viability

- 1.30 An important requirement for core strategies is that they are flexible enough to deal with changing circumstances while still providing a clear

strategy to guide development. This is a particular challenge in the current economic climate. In some parts of the country housebuilding has reduced sharply and retail vacancies are increasing, along with unemployment. Medway is faring better than many areas but there is still much uncertainty over what can be delivered over the next few years.

- 1.31 Fortunately we have a healthy supply of identified development opportunities – housing, retail and employment – which should allow Medway to respond in these challenging times and this is a key feature of the proposals in this Core Strategy.

Saved Policies

- 1.32 Policies from old style development plans were ‘saved’ under transitional arrangements when the Planning & Compulsory Purchase Act 2004 came into force. That is, they remain in place until replaced by appropriate policies in local development frameworks.
- 1.33 This Core Strategy supersedes a number of ‘saved’ Medway policies and these are listed in Appendix A. These will fall away when the Core Strategy is adopted. All remaining ‘saved’ policies will be replaced when a subsequent development plan document is prepared as described below.

Other Development Plan Documents

- 1.34 As explained above a local development framework comprises a portfolio of different documents. Following the adoption of this Core Strategy the Council intends to produce two further documents. These will be:
- A Community Infrastructure Levy Charging Schedule – this will introduce a development levy to fund essential infrastructure and facilities, the need for which is generated by new built development. It is intended that this will be progressed as quickly as possible after the independent examination of the Core Strategy
 - A Land Allocations and Development Management Policies development plan document – this will address all other LDF matters, replacing all outstanding ‘saved’ policies and providing a new Proposals Map for Medway. Work on this document will begin as soon as possible after adoption of the Core Strategy.

What Happens Next

- 1.35 This version of the Core Strategy is being submitted to the Secretary of State for Communities and Local Government, who will appoint an inspector to independently examine the ‘soundness’ of the strategy and its ‘conformity’. The appointed inspector will conduct public hearings as considered necessary before submitting a report to the Council. Further details of this process can be accessed at:
<http://www.planningportal.gov.uk/planning/planningsystem/localplans>

2. Context and Issues

Introduction

- 2.1 This chapter briefly describes some of the key facts and statistics that have informed the Core Strategy, it summarises the findings from the Sustainable Community Strategy and lists the issues which the area faces. The remaining chapters consider how these issues should be addressed. This analysis includes what is sometimes referred to as a 'spatial portrait' of the area.

Population Base

- 2.2 Based on Office of National Statistics (ONS) official projections and the level of house building proposed being achieved in this Core Strategy, it is anticipated that Medway's population will grow from 255,400 (in 2010) to 278,200 by 2028. However a number of factors, including a move from an historic net out migration trend to more recently net in migration, could result in an increase in this figure. This is likely to be the case if the graduate retention, economic and regeneration policies proposed are successful. A rounded figure of 280,000 has therefore been used to assess requirements arising from the scale of development proposed in the Core Strategy.

State of Medway Reports (SOMs)

- 2.3 In order to inform the Core Strategy, the Council published a series of State of Medway reports in 2008. These set out the baseline from which the Core Strategy was developed. This information provided stakeholders with a common understanding of the context in which the Local Development Framework is being prepared.

- 2.4 The State of Medway reports cover the following topics:

- Built Environment
- Chattenden (Lodge Hill)
- Climate Change, Renewables and Flooding
- Demography and Social Trends
- Economy and Employment (including Employment Land)
- Education and Skills
- Housing
- Infrastructure
- Minerals
- Natural Assets and Open Space
- Retail, Leisure and Culture
- Policy Framework
- Waste
- Water Supply

- 2.5 The reports can be viewed on the Council's website at <http://www.medway.gov.uk/ldf> . Updated versions were published in January 2012.

Evidence Base Studies

- 2.6 A wide range of key evidence studies has also been produced in order to inform the Core Strategy. The following list identifies some of the main ones. They can be accessed via:
<http://medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase.aspx>
- Strategic Land Availability Assessment (SLAA) November 2010
 - Strategic Housing Market Assessment (SHMA) 2010
 - Infrastructure Plan
 - Medway Economic Development Strategy for 2009 - 2012
 - Employment Land Review Consolidation Study 2010
 - SATURN Transport Model
 - Strategic Flood Risk Assessment (SFRA) 2006 & Addendum 2011
 - Strategic Urban Flood Defence Strategy 2010
 - Regional Waste Management Capacity Study 2007
 - The Gravel Resources of North Kent 1987
 - Medway Retail Needs Study 2009
 - Draft Medway Green Grid Action Plan 2007
 - Medway Landscape Character Assessment 2010
 - Medway Renewables Energy Capacity Study 2010
 - Medway Rural Housing Needs Assessment 2009
 - Lodge Hill Evidence Base Reports
(<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase/lodgehill.aspx>)
- 2.7 The Local Strategic Partnership (LSP) has produced the Medway Sustainable Community Strategy (SCS)¹ alongside the Core Strategy. It is based upon a vast volume of information and input from key community stakeholders. The Medway Sustainable Community Strategy was prepared in the context of the South East Plan, the Regional Economic Strategy, the Thames Gateway Plan and the North Kent Multi-Area Agreement.
- 2.8 The Regional Economic Strategy recognised Medway as a priority area for investment. The North Kent Multi-Area Agreement 2009 was an agreement between Central Government and the 5 local authorities with responsibilities in North Kent (Kent County Council, Medway Council, Dartford Borough Council, Gravesham Borough Council and Swale Borough Council) covering economic development, enterprise, employment, skills, transport, housing and the environment.
- 2.9 The Sustainable Community Strategy document highlights a variety of evidence and issues of particular importance to Medway as summarised below.

¹ <http://medway.gov.uk/pdf/Medway%20Sustainable%20Community%20Strategy%202010-26.pdf>

Economic Profile

- 2.10 Medway has benefited and continues to benefit from considerable investment arising from its strategic location within the Thames Gateway. A major transformation has taken place around the former Pembroke naval buildings in Chatham creating the Medway Campus, home to three universities and Mid Kent College. A new sustainable community has been created in the rest of Chatham Maritime where £400 million of public and private investment has created a showpiece living and working environment attracting large corporate names. Recent infrastructure investment includes the Medway Tunnel and the High Speed Rail Link from the Channel Tunnel to London. This is resulting in a welcome diversification of the economic base towards creative industries, financial and business services, education and environmental and energy technologies. This has added to Medway's long-standing manufacturing strengths. Nationally important energy and port facilities are located on the Hoo Peninsula.
- 2.11 Farming generates significant income as Medway has a larger than average proportion of Grade 1 agricultural land. This sustains numerous permanent and temporary jobs (as recognised in the Medway Agricultural Research 2010 report).
- 2.12 Good progress has been made in raising skill levels, which are growing significantly faster than the regional and national averages. The unique cluster of universities at Chatham Maritime, Mid Kent College and the University for the Creative Arts at Rochester contribute greatly to this.
- 2.13 However, Medway remains a relatively low wage area with high numbers of people commuting out to work and skill shortages particularly at NVQ 3 and 4 levels. The business start up rate remains well below the regional and national rates though evidence for this predates the establishment of the Medway Enterprise Hub and Innovation Centre. External transport links are excellent and improving and the new dynamic bus facility together with investment in a quality public transport network will improve bus services within Medway. However there are issues around fares, off peak services and service penetration, and integration with rail services. There are particular issues on the Hoo Peninsula, due to its relative remoteness. Traffic congestion on key routes during peak periods is a further issue.
- 2.14 Any deficiency in employment space of the right type and in the right place may constrain economic growth. Similarly the potential for further developing Medway as a tourism destination is limited by a lack of hotels, the need for a quality environment, connectivity, its image and its town centre offer, particularly in Chatham. These issues are however being tackled through actions in the Medway Regeneration Framework 2006 - 2016 and by developing Medway as a city break destination.

Social Profile

- 2.15 The population of Medway is younger than the national average but it is ageing faster. The area has higher levels of deprivation than neighbouring local authorities in Kent and the South East. It is ranked as the 132nd most deprived local authority out of 325 in England, though at neighbourhood level, it has some of the most affluent as well as some of the most deprived areas in the country.
- 2.16 The overall attainment of children and young people at school in Medway is better than similar local authorities in England and has improved consistently in recent years. However this conceals significant differences within Medway and underachievement at Key Stage 2. These issues are being tackled through various measures including the Primary Strategy for Change, the development of academies and a focus on vulnerable groups of children.
- 2.17 The recent arrival of people from the EU Accession countries, although generally successfully integrated into the community, has brought challenges of integration in particular areas of Medway and these are likely to continue as new developments attract more incomers to the area.
- 2.18 There is a thriving voluntary and community sector with over 580 organisations across Medway providing a range of services for local people, including engaging with the most hard to reach communities.

Environmental, Cultural and Housing Profile

- 2.19 Medway has a diverse natural environment ranging from the marshlands and wetlands of the Hoo Peninsula to downland in the south and west of the area. There are eight nationally and internationally important designated nature conservation areas and three parks with Green Flag status. In addition to the river that gives the Borough its name, there is also Metropolitan Green Belt land, as well as part of the Kent Downs AONB. Medway also has a significant historic built environment with 26 Conservation Areas, over 600 Listed Buildings and 79 Scheduled Ancient Monuments. Much of this is little known outside the immediate area. Local environments are generally clean and well looked after though satisfaction levels do not always reflect this.
- 2.20 Medway has a strong cultural and heritage offer including, new state of the art sports facilities at Medway Park, a potential World Heritage Site and recognition of the local arts and music scene through the Culture and Design Awards. Potential exists to strengthen this further and increase visitor numbers as well as local engagement, as recognised in the Cultural Strategy.
- 2.21 Medway has a below average carbon footprint due to the relatively low jobs to workforce ratio in the area though there are still challenging targets to meet.
- 2.22 Medway has declared a number of Air Quality Management Areas related to road traffic emissions in the urban area.
- 2.23 DEFRA has recently published details of areas where noise action plans may be required in Medway and this area of work is expected to develop

over the LDF period. First priority locations identified by Noise Maps are areas on the highway network where the noise level (LA10,18h) is at least 76 dB.

- 2.24 Progress against targets for new and affordable houses is good but affordability remains an issue. The quality of some private housing and the environment of some private and public housing areas is poor, particularly in some of the more deprived areas. As a result the Housing Partnership is embarking on a targeted partnership approach to improving housing in All Saints and Luton.

Medway Now

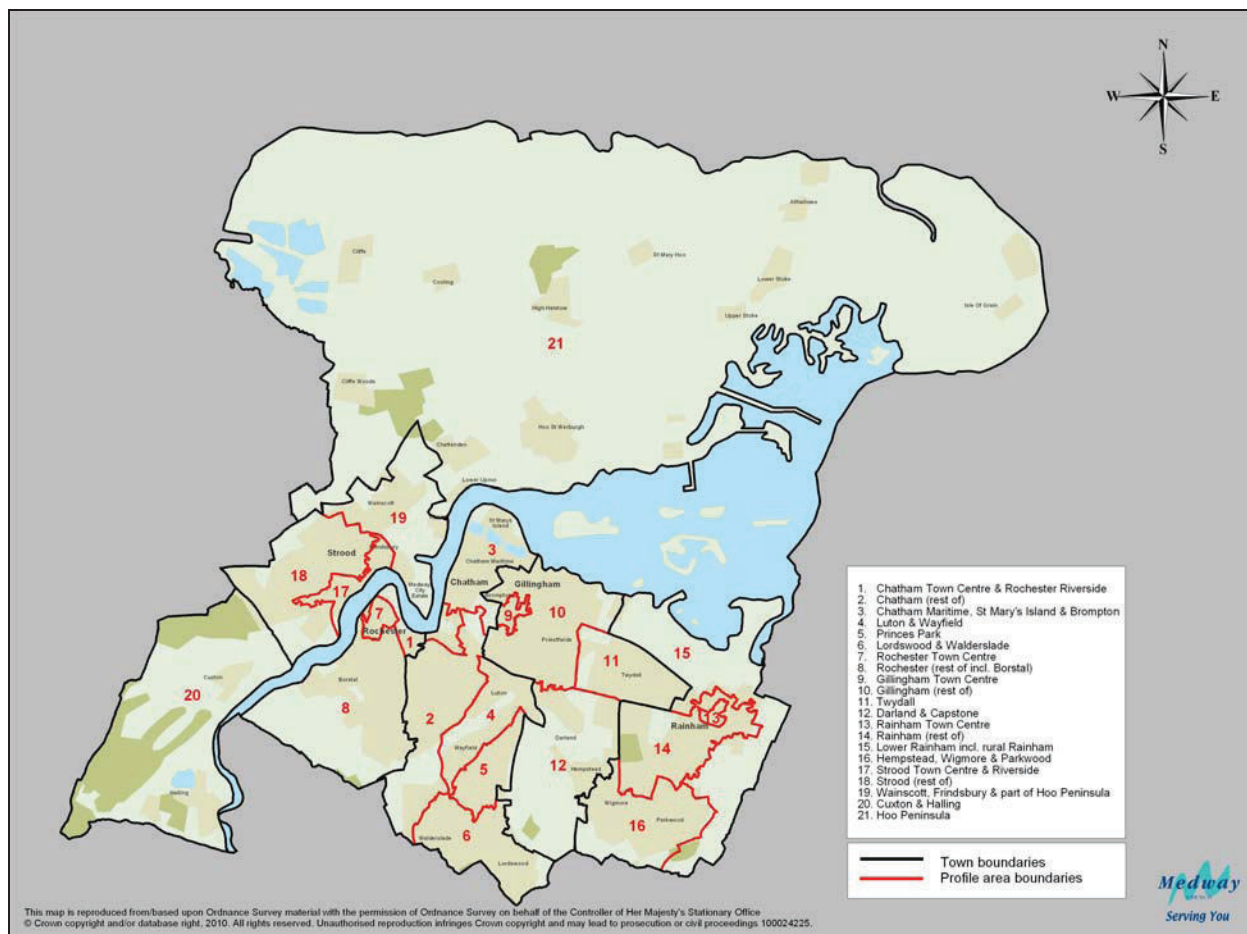
- 2.25 In addition to this analysis individual neighbourhood area profiles² have been produced in order to drill down below the Medway level. They assess the individual needs of each local area and highlight the key issues that they face. The profiles cover the following 21 local areas within Medway, and the relevant areas are shown in Figure 2-1:

- Chatham town centre and Rochester Riverside
- Chatham (rest of)
- Rochester town centre
- Rochester Riverside (rest of, including Borstal)
- Chatham Maritime, St Mary's Island and Brompton
- Gillingham town centre
- Gillingham (rest of)
- Twydall
- Rainham town centre
- Rainham (rest of)
- Lower Rainham (including rural Rainham)
- Hempstead, Wigmore and Parkwood
- Darland and Capstone
- Princes Park
- Luton and Wayfield
- Lordswood and Walderslade
- Cuxton and Halling
- Strood town centre and Riverside
- Strood (rest of)
- Wainscott, Frindsbury and part of Peninsula
- Hoo Peninsula

²

<http://medway.gov.uk/environmentandplanning/developmentplan/factsandfigures/areaprofiles.aspx>

Figure 2-1 Local Areas



2.26 The headline findings from this work are:

- Chatham is the least populated town centre and Gillingham is the most densely populated town centre area in Medway
- The main areas of population growth are in those parts that have seen the most significant residential development – St Mary's Island, Chatham town centre and Rochester Riverside and Wainscott and Frindsbury
- Areas with the youngest average resident age are concentrated in a fairly central grouping in Medway, around central parts of Chatham and Gillingham. 'Older populations' are nearer the periphery of Medway, with a particular concentration around Rainham and adjoining parts of Gillingham
- The 'least dependent' populations in Medway are concentrated in a 'central arc' running from Rochester town centre, through central Chatham, across to include most of Gillingham. These areas have the highest proportional working-age population
- The areas, which have seen the largest decrease in population dependency, are on the whole within the central urban areas. Areas towards the periphery of Medway show the greatest increase in population dependency as a result of the ageing population.

2.27 The findings for more local areas are summarised below.

Chatham

- 'Chatham Maritime, St Mary's Island and Brompton' and 'Chatham Town Centre' have seen significant population growth since 2001
- 'Chatham Maritime, St Mary's Island and Brompton' has the youngest average resident age
- 'Chatham Town Centre and Rochester Riverside' has the highest proportional working-age population and the highest ratio of jobs to working-age residents
- 'Chatham Maritime, St Mary's Island and Brompton' has the second highest proportional working-age population and has the lowest elderly population dependency ratios
- 'Chatham town centre and Rochester' and 'Luton and Wayfield' have high 'out-of-work' benefit claimant rates
- 'Chatham (rest of)' and 'Luton & Wayfield' suffer significant deprivation

Rochester

- 'Rochester Riverside' has seen significant population growth since 2001
- 'Rochester town centre' has the oldest average resident age but it is one of only two areas that have seen a falling average resident age
- 'Worklessness' as measured by claims for Incapacity Benefit is high in 'Rochester town centre'

Gillingham

- 'Twydall' is amongst those areas with the largest decreases in population since 2001
- 'Gillingham town centre' has seen the largest decrease in average resident age - it is one of only two areas that have seen a falling average resident age
- 'Gillingham town centre' saw the largest decrease in population dependency with a declining elderly population and an expanding working-age population
- 'Twydall' has the most 'dependent' population, having the lowest proportional working-age population of all areas in Medway
- 'Gillingham (rest of)' has the highest proportion of employment in service related jobs
- 'Gillingham town centre' has the highest 'out-of-work' benefit claimant rates
- A relatively high number of benefit claims made by disabled residents in Medway are made in 'Gillingham (rest of)'
- Lone-parents account for a high proportion of all benefit claims in 'Gillingham town centre'
- Much of Gillingham suffers significant deprivation, one-in-four working-age residents in 'Gillingham town centre' claim an out-of-work benefit

Rainham

- 'Hempstead, Wigmore and Parkwood' and 'Rainham rest of' are amongst those areas showing the largest decreases in population since 2001
- 'Rainham rest of' has the second oldest average resident age having the highest proportion of residents aged over retirement age
- 'Hempstead, Wigmore and Parkwood' has seen the largest resident age increase since 2001
- 'Lower Rainham' has the fewest jobs per working-age resident
- 'Hempstead, Wigmore and Parkwood' has seen the largest increase in population dependency of all areas in Medway
- A high proportion of benefit claims in 'Lower Rainham' are by disabled claimants
- 'Lower Rainham' has a relatively high proportion of benefit claims by carers

Strood

- 'Strood town centre and Riverside', is amongst those areas showing the largest decreases in population since 2001
- 'Wainscott, Frindsbury and part of Peninsula' has the smallest proportional working-age population
- A high proportion of benefit claims in Wainscott & Frindsbury are by disabled claimants and carers
- Worklessness as measured by claims for Incapacity Benefit is high in 'Strood town centre and riverside' and Wainscott & Frindsbury
- Many parts of Strood suffer significant deprivation.

Key Issues

- 2.28 Taking account of the above, there many important issues affecting Medway that need to be addressed. Many but not all of these are shared with the Sustainable Community Strategy. For convenience they are grouped under a series of sub headings.

Economy and Learning

2.29 There is a need to create a Medway city centre and central business district in Chatham that maximises retail, employment, cultural and housing opportunities. Chatham is the natural heart of the Medway conurbation and it strongly influences the overall image of the area. However it is significantly underperforming economically and large parts suffer from a poor quality townscape.

2,30 There should be a focus on sector development by strengthening inward investment, developing the creative industries sector and exploring the potential for centres of excellence in environmental technology and construction. The current low wage economy needs to further diversify and exploit key sectors if Medway's relative economic performance is to improve.

- 2.31 Boosting cutting edge low-carbon environmental technologies and the development of growth sectors such as creative industries and spin offs, construction, advanced manufacturing, and sub-contractors and services. These are assessed as having the greatest potential to boost local economic performance.
- 2.32 Ensure the availability of employment space by reviewing mixed use allocations, investing in infrastructure and assessing the development potential of existing employment and key derelict sites. There have been significant reductions in employment floorspace in recent years. This has been necessary as redundant waterside locations needed to be cleared for redevelopment and consolidation in the manufacturing sector has taken place. However the time has come to re-build the employment floorspace stock with modern, adaptable premises suited to modern needs.
- 2.33 Develop the Medway image around the growing Higher and Further Education and creative sectors, by promoting Medway as a venue for top sporting and cultural events, supporting the World Heritage bid, raising the profile of the River Medway and improving key gateways and town centres. These are amongst Medway's most important assets and utilised correctly provide the basis for transforming Medway's image and community confidence.
- 2.34 Develop an Enterprise Strategy covering all forms of enterprise including social enterprise. Business start-up rates are not as high as they should be and creating and nurturing an entrepreneurial culture is critical to future economic prospects.
- 2.35 Explore the transformational power of communications infrastructure (WiFi, fibre optics etc) in order to make Medway a "Smart" location for business. High quality 'connectivity' is vital to modern businesses and amply demonstrated by the success of the Medway Innovation Centre, which has this.
- 2.36 Deliver the Primary Strategy for Change bringing in new investment in school buildings and creating 21st century learning environments. In an ever more competitive world educational attainment is vital. Local standards are improving (from a low base) but more needs to be done.
- 2.37 Promote hotel development. Medway attracts large numbers of day visitors to its exceptional attractions but comparatively few short and longer stay visitors. There have been recent, very welcome, increases in the stock of hotel bedrooms but much of these have been at the budget end of the market. There is also potential to expand so called 'business tourism' that demands a broader range of facilities than those provided by budget operators.
- 2.38 Protect the large areas of the Hoo Peninsula and other land to the north and east of the urban area, which are classified as Grade 1 Agricultural Land. As well as being a nationally important asset, this land is also of considerable importance to the Medway economy. With food security a

growing global issue the importance of recognising this valuable natural resource has never been greater.

- 2.39 Address the disparities that exist within Medway, with pockets of considerable affluence and deprivation (often close by one another). Equality of opportunity reduces dependence, improves social cohesion and community confidence. It also leads to higher economic performance and an improved quality of life. However significant sections of the population are classified as 'deprived'.
- 2.40 Promote an environmental technologies cluster. Research has identified the potential of the Hoo Peninsula in particular. There are, in any event, exceptional opportunities to link Medway's strong manufacturing pedigree with its growing higher and further education sector.
- 2.41 Maximize the benefits from the Universities at Medway by broadening the range of opportunities available for local people, raising skill levels and bringing associated benefits to the economy (including knowledge clusters). From no universities in the early 1990's to four now and an undergraduate student population of around 10,000, Medway has a unique opportunity to extract additional value from this investment.
- 2.42 Retain and grow existing businesses and attract new ones to increase economic activity. In particular, the number and quality of jobs in Medway needs to be increased. There are significantly fewer jobs than resident workers in Medway and wage rates are very low. London will always be a strong draw but there is a clear need to reduce the current reliance on out-commuting and to foster higher value employment locally.
- 2.43 Maximise business opportunities arising from the presence of around 10,000 students and staff at the universities. Retaining new graduates and harnessing their entrepreneurial drive will provide an additional opportunity to grow the Medway economy.
- 2.44 Increase the amount of student and visitor accommodation available in Medway. High number of students can distort the private rented housing market and displace vulnerable households. Specialist accommodation will limit this risk and improve Medway's perception as a location of choice for new students.
- 2.45 Work to retain the University for the Creative Arts with a growing presence in Medway. This new and thriving university is looking to consolidate its accommodation and develop a flagship campus. Every effort needs to be made to ensure that this is in Medway, where it has long established roots.
- 2.46 Promote workforce skills development, graduate retention and increases in Gross Value Added levels. Skills attainment levels amongst the existing Medway workforce are lower than the regional norm. Improving these is a critical component of a wider educational attainment and skills programme.

Transport

- 2.47 Invest in public transport infrastructure including a new dynamic bus facility at Chatham, upgraded railway stations at Chatham, Gillingham, Rochester and Strood, strategic bus corridors and park and ride. Good progress has been made over the last three years but further work is needed, particularly in relation to a park & ride network and station upgrades.
- 2.48 Ensure good public transport links to, and within, new developments and improved links to existing neighbourhoods. Much of Medway's network of bus routes can be traced back many years. It needs to adapt to travel patterns that are changing as new development and destinations are developed. Many suburban areas also suffer from poor accessibility to services, particularly in the evenings.
- 2.49 Improve public transport links to the universities and college campuses. These are new destinations well related to the urban core and should be readily accessible by bus in particular.
- 2.50 Make highway improvements including the A228 to Grain and highway capacity improvements including Strood centre. The A228 carries a very high proportion of HGVs accessing the port and energy installations on the Hoo Peninsula and it has a poor safety record. Strood is a particular bottleneck and congestion detracts from the attractiveness of the town centre and results in air pollution.
- 2.51 Provide more opportunities for cycling and walking. Much has been done over the last few years but existing and new improvements should join up to create obvious networks that provide travel alternatives for local people.
- 2.52 Investigate the potential of the River Medway for work and leisure travel and for further river crossings. New opportunities should arise as the regeneration of the urban waterfront progresses and new visitor destinations develop along it.
- 2.53 Provide better transport links and wider transport choices in Medway to support regeneration, increase accessibility and connectivity, and reduce reliance on the car.

Climate Change

- 2.54 Consider extreme weather events (flash flooding, storm surges) that have the potential to significantly affect the Medway area when coupled with sea level rise, as there are significant low-lying areas in the Medway River valley, which are potentially at risk from flood events. A range of studies and plans has been completed to inform the response needed.
- 2.55 Reduce carbon emissions and improve air quality within the Medway area including domestic, business and transport emissions.
- 2.56 Reduce carbon emissions and improve energy efficiency of both new and existing housing by working with the community. Apart from the environmental benefits increasing fuel poverty heightens the importance of this issue.

- 2.57 Increase use of sustainable energy and investigate use of decentralised heating schemes.
- 2.58 Raise awareness of and assist in reducing water wastage, encourage reduction in water consumption and encourage water recycling. This is vital given Medway's low rainfall and tidal river that is not suitable for abstraction.
- 2.59 Realise opportunities to restore and recreate wildlife habitats in association with sustainable flood-risk management. Again a number of plans and strategies have been completed to assist in this.
- 2.60 Address the impacts of coastal squeeze and loss of inter-tidal habitats. The Shoreline Management Plans and Thames Estuary 2100 Plan should guide the response to this.
- 2.61 Recognise that water supply in Medway is largely dependent on ground water abstraction as there are no large reservoirs or any significant abstraction from the River Medway within the Borough. Water resources face increasing demand arising from existing and new development, exacerbated by changes to the climate and rainfall patterns.
- 2.62 Be aware that flood risk is a key environmental issue and therefore flood management issues need to be integrated into planning decisions. Whilst Medway has a significant proportion of previously developed land suitable for redevelopment within areas of higher flood risk. It is not appropriate to prevent all new developments in these areas, as it is needed to avoid social and economic stagnation and blight.

Green Infrastructure

- 2.63 Develop the Green Grid through the implementation of identified priority strategic routes. The Green Grid identifies opportunities to connect urban and rural Medway in ways that are sensitive to the natural environment.
- 2.64 Safeguard and enhance the character and appearance of Medway's diverse landscapes via proactive land management. Medway has some exceptional landscapes but these are sensitive to development and visitor pressures.
- 2.65 Strengthen, protect, conserve and increase the protection and conservation of open spaces. These are vital to everyone's quality of life and are an intrinsic feature of the area.
- 2.66 Conserve and enhance the diversity and abundance of habitats and species and seek to increase the connectivity of existing and new habitats to ensure that development does not result in the isolation of habitats. Biodiversity is a cornerstone of environmental quality but is under pressure, not only from development but also climate change.
- 2.67 Encourage community engagement in conserving and developing open space through, for example, the development of "friends" groups. A number of such groups have been established and been vital to the

development of, for example, the Hillyfields open space and the Great Lines Heritage Park.

- 2.68 Apply Green Infrastructure planning in connecting people and places. The foundations for this are in place through the Green Grid Forum and the North Kent Environmental Planning Group.
- 2.69 Continue to develop and ensure the sustainability of the Great Lines Heritage Park as the metropolitan park for Medway.
- 2.70 Ensure the adequate provision of green space in association with development. This is vital to quality of life, adapting to climate change, biodiversity and more.
- 2.71 Ensure that the nature conservation impacts of riverside development are taken into account. The river and estuary are sensitive eco systems and this must be considered alongside their commercial and leisure potential.
- 2.72 Reduce pollution affecting the Medway Estuary and local wildlife habitats.
- 2.73 Recognise that the majority of sand and gravel reserves in Medway are found on the Hoo Peninsula but there are both economic and environmental constraints regarding their extraction.
- 2.74 Provide additional capacity in recycling, recovery and final disposal to meet the national waste strategy targets for municipal and commercial and industrial wastes and enable all waste streams to be 'pushed' up the waste hierarchy away from landfill.

Built Environment and Neighbourhoods

- 2.75 Promote high quality design. Too much of the town centres and surrounding areas is characterised by insensitive architecture and poor urban design. This detracts from the setting of many fine buildings and the image of the area.
- 2.76 Implement the Public Realm Strategy. Our major streets and limited squares need improving and better connections established between them.
- 2.77 Improve the overall image of Medway. This is vital to economic success and community confidence and pride.
- 2.78 Deliver good quality housing in mixed use developments to contribute to sustainable regeneration.
- 2.79 Be aware that although Medway has a younger age profile than Kent and the national average, over time the structure will get older, placing an added pressure on meeting housing needs.
- 2.80 Ensure that more executive housing is provided. Too few business owners and managers reside in Medway and opportunities need to be identified to encourage them to do so.

- 2.81 Develop a multicultural community centre at the historic dockyard. This is a longstanding ambition and an opportunity to celebrate Medway's cultural diversity.
- 2.82 Develop place based initiatives to improve health in neighbourhoods identified as having the worst health and lowest life expectancy. Parts of Medway have significant health issues compared to other areas.
- 2.83 Develop a waterfront arts complex in Chatham as part of a wider cultural area including the Brook and Central theatres. A clear focus for cultural activity is needed and should form part of the regeneration programme for Chatham.
- 2.84 Implement the Chatham Centre and Waterfront Development Framework.
- 2.85 Implement the Gillingham Town Centre Development Framework.
- 2.86 Implement road improvement and retail improvements in Strood.
- 2.87 Implement and ensure integration of Rochester Riverside with Rochester Centre. This is one of Medway's most important regeneration projects and has the critical mass and visual prominence to enhance the image of Medway as a whole.
- 2.88 Create and deliver a brand new settlement at Lodge Hill, Chattenden that has strong links to the wider Hoo Peninsula. This will be the only freestanding new community in the Thames Gateway and will be a major contributor to the future development needs of the area as a whole.
- 2.89 Areas beyond town centres, large urban regeneration sites and the new settlement at Lodge Hill are not envisaged as being subject to major physical change. This is due to the fact that these areas can provide more than sufficient development capacity to meet all of Medway's needs over the plan period.
- 2.90 The main evidence used to identify these issues can be found in the following documents:
 - Medway Economic Development Strategy 2009-12
 - Medway Regeneration Framework 2006-16
 - Thames Gateway Core Vision 2009 and Delivery Plan
 - Universities at Medway Annual report 2009
 - Local Transport Plan 3 2011
 - North Kent Economic Development Plan 2009
 - North Kent Multi Area Agreement 2009
 - Medway Social Regeneration Strategy 2008 - 2016
 - Medway Learning and Skills Plan 2008
 - Growing Healthier - NHS Medway's Strategic Commissioning Plan 2008/9 to 2012/13
 - Strategic Plan for Older People in Medway 2010 -13
 - Medway Children and Young People's Plan 2009-11
 - Medway Health and Wellbeing Strategy 2010-15
 - Medway Landscape Character Assessment 2011

- Medway Wildlife, Countryside and Open Space Strategy 2008-16
- Medway's Community Safety Partnership Strategy 2008-11
- Medway Green Grid Action Plan 2007
- Greening the Gateway Kent and Medway Green Clusters Studies for Hoo Peninsula 2008 and Bredhurst - Capstone 2008
- Medway Housing Strategy 2008-11
- Medway Cultural Strategy 2009-14
- Kent Downs AONB Management Plan 2009

3. Vision and Strategic Objectives

Introduction

- 3.1 This chapter sets out the 'spatial' vision for Medway, in the context of Medway's Sustainable Community Strategy prepared by the Local Strategic Partnership and the issues identified in Chapter 2. It also explains the overall level of housing and employment growth proposed over the period to 2028.
- 3.2 The critical elements needed to guide development are then set out as a series of 'strategic objectives'. These, along with the spatial vision will form an overall guide for development decisions over the period covered by this Core Strategy and the policies in later chapters flow from them.

Sustainable Community Strategy

- 3.3 The Local Strategic Partnership, or LSP, prepared the overarching Medway Sustainable Community Strategy during 2009 and 2010.
- 3.4 The Partnership has an extensive membership drawn from across the Medway community and over 350 organisations. These include all the major providers of local services and a range of statutory agencies active in the area. Significant stakeholder engagement was an integral feature of the process and the final strategy has a very high level of support.
- 3.5 The Strategy supersedes the More to Medway Community Plan 2007 – 2010 and it takes a longer-term perspective that is deliberately aligned to that of this Core Strategy.
- 3.6 It also reflects many other plans and strategies for the Medway area, including the third Local Transport Plan, a Joint Needs Assessment and many more.

Vision for Medway

- 3.7 In the strategy the vision for Medway to 2026 is summarised in the strap line:

'City of Medway: Rich heritage, great future'.

- 3.8 It consists of four key principles and six ambitions.

- 3.9 The four key principles are:

- *Sustainability: will our actions work for tomorrow as well as today?*
- *Narrowing the gap: will our actions contribute to improving the lives of everyone so reducing the gap between deprived and more affluent areas?*
- *Fairness: do our actions take account of all sections of society thus ensuring that everybody benefits from the regeneration of Medway?*
- *Self-help: will our actions encourage people to take responsibility themselves to make things better?*

- 3.10 The six ambitions are:
- *Medway to have a thriving, diverse and sustainable economy matched by an appropriately skilled workforce and supported by a Higher Education Centre of Excellence*
 - *Every child to have a good start in life*
 - *Medway residents to enjoy good health, well being and care*
 - *Medway to have a safe and high quality environment*
 - *Medway to be a place where people value one another, play an active part and have pride in their community and Medway as a whole*
 - *Medway to be recognised as a Destination for Culture, Heritage, Sport and Tourism*
- 3.11 A wide range of actions is then identified to realise these ambitions and specific plans are in place to take forward delivery.

Overall Levels of Growth

- 3.12 PPS3 requires local planning authorities to determine the local level of housing provision, taking into account current and future levels of need and demand for housing and affordability levels. These should take into account Strategic Housing Market Assessments and the Government's latest published household projections. PPS3 does not require local authorities to identify a range of options for the level of housing provision.
- 3.13 When the South East Plan was being prepared Medway Council supported the proposed housing requirement for the area of an average of 815 dwellings per year for the 2006 to 2026 period. This was considered to represent a realistic balance between meeting local needs and contributing to growth in the Thames Gateway, a national priority area for both growth and regeneration.
- 3.14 This remains the case and it is intended that the 815 per year average be rolled on to the end date for the Core Strategy of 2028.
- 3.15 To put this in context, the previous Kent and Medway Structure Plan 2006 requirement of 766 for Medway was higher than the annual average number of 681 actually delivered over the previous 10 years. A higher figure is unlikely to be deliverable and a lower figure would not meet the future levels of need in Medway and not be compatible with the objectives for the Thames Gateway. The target of 815 new homes per year will be challenging, particularly given the difficult economic climate, but it will also help to deliver essential regeneration and the ambitions for the Thames Gateway.
- 3.16 It is important that adequate provision is made for new employment opportunities, both to match the growing population and to improve Medway's economic performance compared to other areas.
- 3.17 Given current economic uncertainties a job target range was assessed, based on different demographic, economic activity and level of out

commuting assumptions. The effect of these different assumptions on forecast job numbers is shown below.

Table 3-1 Employment Growth to 2028

Factor	Assumption	Effect on Job Requirement
Natural demographic change	Change in numbers of people of working age and increase in post retirement age workers	4,300
Improvement in Employment rate	<i>Either</i> an improved employment rate to SE level (high)	8,700
	<i>Or</i> an improved employment rate to National level (low)	900
Reduced out-commuting	<i>Either</i> a 25% reduction in net out commuting (high)	7,300
	<i>Or</i> 10% reduction in net out commuting (low)	2,900

3.18 This was then assessed using different combinations of these factors – in effect alternative scenarios. The results of four of these are set out below.

Table 3-2 Job Requirements to 2028

Scenario	Job Requirement
Low employment, low commuting reduction (4,300+ 900+ 2,900)	8,200
Low employment, high commuting reduction (4,300+ 900+ 7,300)	12,500
High employment, low commuting reduction (4,300+ 8,700 +2,900)	15,900
High employment, high commuting reduction (4,300+ 8,700+ 7,300)	20,300

3.19 In setting a specific jobs target for the Core Strategy these and a range of other factors were considered including the findings of the Medway Employment Land Review Consolidation Study, 2010. This Study recognised that in Medway a key objective is to increase employment, reduce out-commuting and improve economic activity rates to levels closer to the South East average. The Study concluded that planning for lower economic growth would not deliver these strategic objectives, could undermine sustainability objectives and ultimately would be self fulfilling by limiting supply and undermining potential economic growth.

3.20 Taking these considerations into account the Council has decided to set an ambitious target of 21,500 additional jobs to be created by 2028 and ensure that there is sufficient capacity in terms of floorspace for this to occur. This is a proposed increase from a 2008 base line figure of 94,500. This will ensure that economic activity is not artificially restricted and that sufficient capacity is available to match housing growth.

The Core Strategy 'Spatial' Vision

- 3.21 Taking full account of the overall vision for Medway, the various issues discussed in Chapter 2 and the growth targets explained above, the spatial vision for the Core Strategy is as follows:

By 2028 Medway will have experienced major change.

Chatham will be transformed into a city centre for Medway that is also of regional significance. It will be a focus for shopping, leisure and cultural activity and a growing employment location, founded on its first class accessibility, city scale services and associated Higher and Further Education Centre of Excellence.

The urban waterfront (north bank: Temple Waterfront to Strood Waterfront; south bank: Rochester Riverside to Gillingham Waterfront) will have been similarly transformed, with mixed-use developments of the highest quality linking the town centres and capitalising on the exceptional setting provided by the river Medway.

The established district centres will be the focus for local community life and services, noted for their friendly and high quality environments. Rochester will continue to be recognised as a tourist destination, linked to the many attractions along the urban waterfront.

More widely Medway will be recognised as a year round tourist destination with a wide range of quality accommodation, facilities and attractions that celebrate its many historic and natural assets.

Easy movement within the urban area will have been achieved through intelligent management of the highway network and parking provision, a network of quality bus corridors linked to park and ride services and high quality interchange facilities. Movement into and out of the area will have benefited from radically improved rail stations at Strood, Rochester, Chatham and Gillingham.

Medway's economy will have grown substantially through the provision of higher value activities and jobs. This will have been achieved by:

- a. Closely aligning skills with the needs of employers and improved levels of educational attainment
- b. Capitalising on the centre of excellence created by our four universities and further education college
- c. Being noted as a location for its communications infrastructure (high speed broadband etc.)
- d. The implementation of reinvestment strategies for each of the established employment areas
- e. Grain, Kingsnorth and Lodge Hill as locations for

- environmental technologies and building products/construction, amongst other activities and Rochester Airfield as a technology and knowledge hub
- f. Chatham, Gillingham and Strood, along with the major waterfront regeneration sites, as a focus for cultural industries and new office based employment opportunities.

Around 17,930 new homes will have been provided over the period since 2006 through the successful development of the identified waterfront and other urban area development opportunities, plus the new freestanding community at Lodge Hill.

Medway will be noted for its high standards of design, fully reflecting sustainability principles and the challenge of climate change through active mitigation and adaptation strategies. This will include being recognised for the way in which its rich historic legacy, including the proposed World Heritage Site, founded on the former Dockyard and its defences, is valued and promoted.

Our rural areas will be celebrated for their rich natural assets, their wildlife diversity and distinctive landscapes, together with their contribution to food security and enhanced village environments. The new settlement at Lodge Hill will have been substantially completed and recognised as a beacon of best practice in terms of its design and sustainability. It will provide a new focus for services on the Hoo Peninsula, while retaining the essentially rural and locally distinctive character of the area and relating sensitively to nearby villages.

The extensive and numerous inner urban and suburban communities will be noted for their greenspaces and thriving neighbourhood centres providing local access to services through community hubs.

Deprivation will have been greatly reduced through effective intervention strategies for target neighbourhoods and the development of local opportunities in line with the development of sustainable neighbourhoods.

The area will be recognised for the way in which everyone has benefited from the large-scale physical regeneration and the way in which change has reflected the social, economic and environmental needs of the area.

Healthy lifestyles will have been actively promoted through intelligent design, enhanced opportunities for sport and recreation and the promotion of walking and cycling.

The River will be celebrated as the dominant and unifying geographical feature of the area through enhanced riverside walks and sensitive balancing of its commercial, leisure and environmental potential.

The area will be widely recognised for its contributions to the nation's energy infrastructure, its port capacity and its gateway function for the importation of minerals and other materials.

Strategic Objectives

3.22 In taking this vision forward the following strategic objectives will guide development and other planning decisions

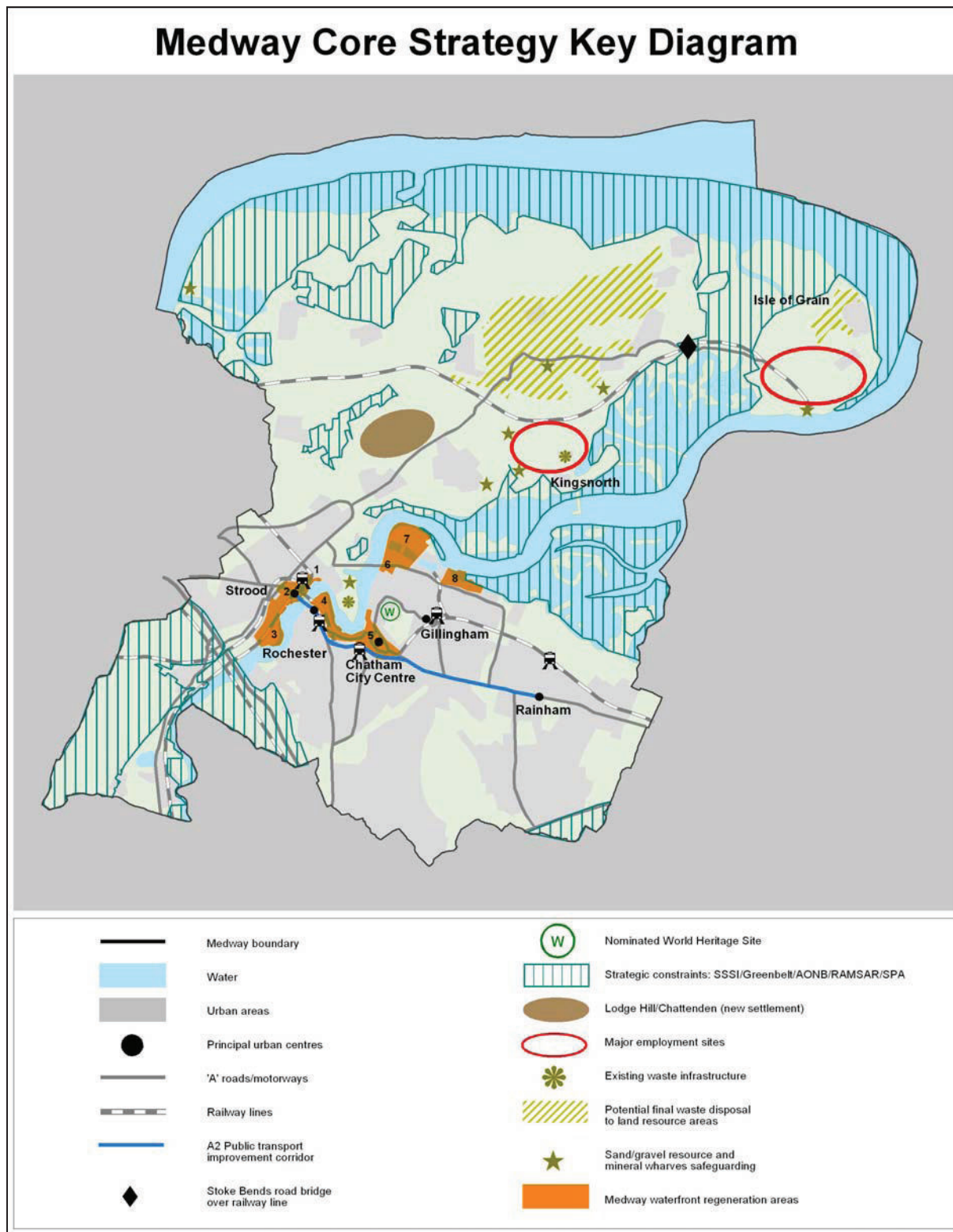
- 1. To effectively realise Medway's role within the Thames Gateway and associated growth requirements primarily through effective physical regeneration, the reuse of previously developed land and the protection and enhancement of the area's many natural and heritage assets.**
- 2. To develop Chatham as a city centre of regional significance with its role complemented by thriving and attractive traditional town centres in Strood, Rochester, Gillingham and Rainham together with a network of strong neighbourhood centres serving local communities.**
- 3. To substantially improve the performance of the local economy, in particular by nurturing higher value activities and reducing the current reliance on out commuting.**
- 4. To focus economic and employment growth in Chatham Centre, within the major mixed use regeneration sites, through re-investment within the established employment areas and at Rochester Airfield, Lodge Hill, Kingsnorth and Grain.**
- 5. To maximise the development opportunities associated with the four Universities and Further Education College to create a centre of excellence of national significance.**
- 6. To radically improve the quality of the townscape and public realm within the central urban area and along the urban waterfront.**
- 7. To boost the range and quality of tourist accommodation and positively promote visitor destinations.**
- 8. To significantly reduce deprivation in Medway, including through the implementation of tailored strategies for target neighbourhoods and the development of a network of strong neighbourhood centres, providing a range of local services and acting as community hubs.**
- 9. To ensure that there is sufficient housing to meet people's needs by providing for a range, mix, type and affordability of housing in locations that contribute to the regeneration and sustainability of the area.**

- 10. To provide for the transport needs of the population through the provision of enhanced public transport facilities, proactive management of the highway network and improved facilities for walking and cycling.**
- 11. To enhance the quality of life of local people through the promotion of healthier lifestyles and the provision of improved cultural, sporting, leisure and tourism facilities, including along the river Medway.**
- 12. To nurture Medway's rural areas and economy, including through village improvement projects, enhanced land management and local access strategies.**
- 13. To make the new settlement at Lodge Hill a model for modern living, exhibiting the highest standards of design and sustainability and complementing existing villages on the Hoo Peninsula.**
- 14. To work proactively to minimise the effects of climate change through efficient resource use, high quality buildings, improved biodiversity, the effective management of open land and other mechanisms.**
- 15. To ensure that there is sufficient minerals and waste management/disposal capacity to meet local requirements and contribute to regional and national needs.**
- 16. To ensure the provision of necessary infrastructure to match the needs of development at the right time and in the right place.**

Key Diagram

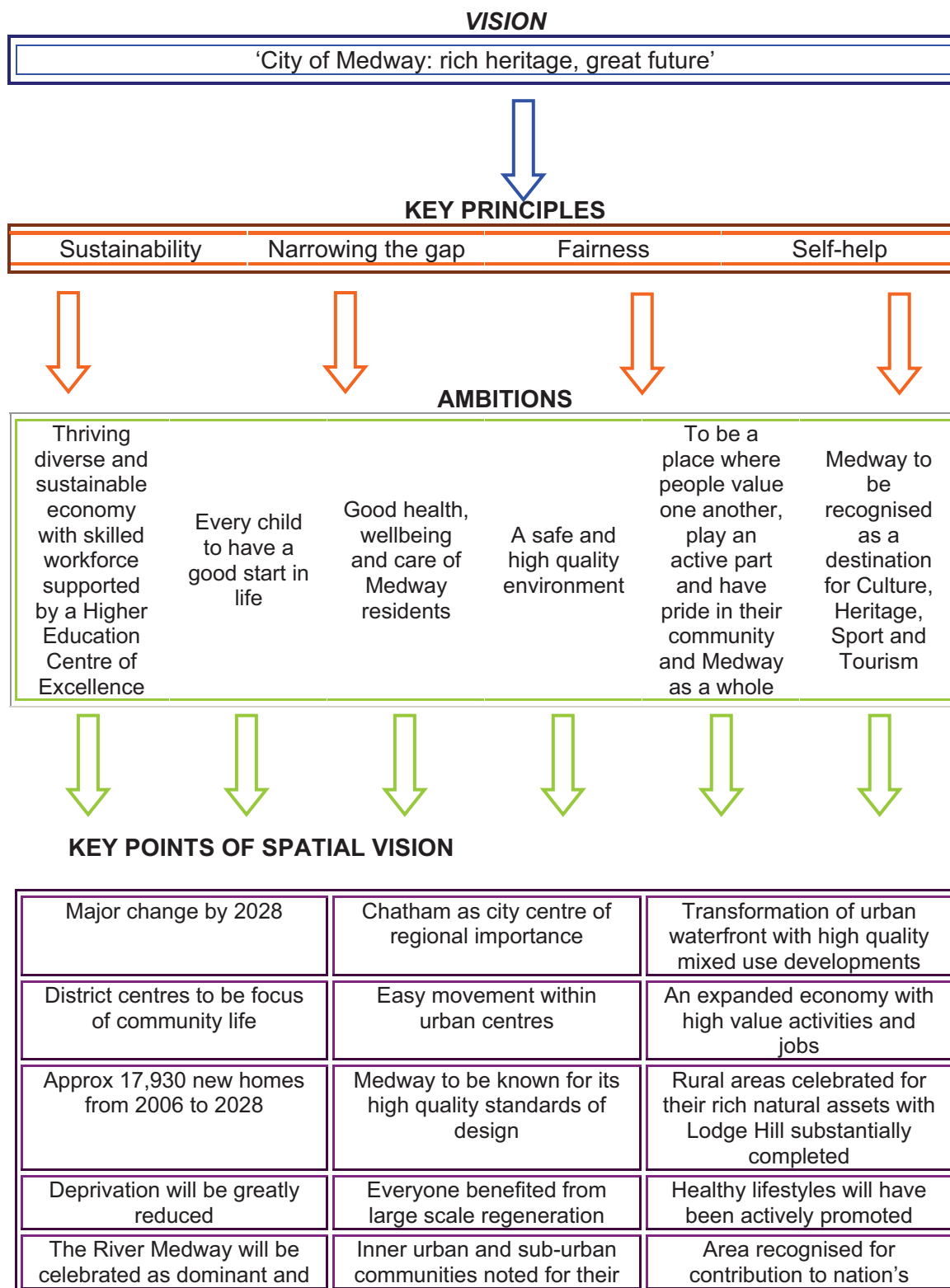
3.23 The main elements of the strategy are illustrated on the Key Diagram below.

Figure 3-1 Medway Core Strategy Key Diagram



3.24 Figure 3-2 below shows the relationship between the spatial vision, the strategic objectives and each policy as set out in the following chapters.

Figure 3-2 Spatial Vision & Strategic Objectives Diagram



unifying geographical feature of area	thriving local or neighbourhood centres	energy infrastructure, its port capacity and gateway function for import of minerals



STRATEGIC OBJECTIVES
(related policies)

(1) Realise Medway's role within Thames Gateway (CS1 Regenerating Medway) (CS6 Preservation & enhancement of Natural Assets) (CS7 Countryside & Landscape) (CS8 Open Space, Green Grid, & Public Realm) (CS9 Health & Social Infrastructure) (CS12 Heritage Assets) (CS17 Economic Strategy) (CS25 The River Medway) (CS26 Strood) (CS27 Rochester) (CS28 Chatham) (CS31 Hoo Peninsula & the Isle of Grain) (CS32 Medway Valley) (CS33 Lodge Hill)	(2) Develop Chatham as a city centre of regional significance (CS1 Regenerating Medway) (CS9 Health & Social Infrastructure) (CS17 Economic Strategy) (CS19 Retail & Town Centres) (CS26 Strood) (CS27 Rochester) (CS28 Chatham) (CS29 Gillingham) (CS30 Rainham) (CS33 Lodge Hill)
(3) Substantially improve the performance of local economy (CS17 Economic Strategy) (CS18 Tourism) (CS20 Education & Personal Development) (CS21 Conventional Energy Generation & Energy Security)	(4) Focus employment growth in Chatham Centre (CS1 Regenerating Medway) (CS17 Economic Strategy) (CS21 Conventional Energy Generation & Energy Security) (CS26 Strood) (CS27 Rochester) (CS28 Chatham) (CS33 Lodge Hill)
(5) Maximise development opportunities of four universities and Further Education College (CS17 Economic Strategy) (CS20 Education & Personal Development) (CS29 Gillingham)	(6) Improve the quality of the townscape and public realm within central urban area and urban waterfront (CS1 Regenerating Medway) (CS2 Quality & Sustainable Design) (CS12 Heritage Assets) (CS18 Tourism) (CS25 The River Medway) (CS26 Strood) (CS27 Rochester) (CS28 Chatham) (CS29 Gillingham)
(7) Significantly reduce deprivation (CS9 Health & Social Infrastructure) (CS26 Strood) (CS27 Rochester)	(8) Sufficient housing to meet people's needs (CS13 Housing provision & Distribution) (CS14 Affordable housing)

(CS28 Chatham) (CS29 Gillingham) (CS30 Rainham) (CS31 Hoo Peninsula & the Isle of Grain) (CS32 Medway Valley)	(CS15 Housing Design & other Housing Requirements) (CS16 Gypsies, Travellers & Travelling Showpeople) (CS33 Lodge Hill)
(9) Provide for transport needs of the population via enhanced public transport facilities (CS1 Regenerating Medway) (CS17 Economic Strategy) (CS24 Transport & Movement) (CS25 The River Medway) (CS26 Strood) (CS31 Hoo Peninsula & the Isle of Grain) (CS32 Medway Valley) (CS33 Lodge Hill)	(10) Enhance the quality of life of local people (CS8 Open Space, Green Grid, & Public Realm) (CS9 Health & Social Infrastructure) (CS10 Sport & Recreation) (CS11 Culture & Leisure) (CS17 Economic Strategy) (CS18 Tourism) (CS19 Retail & Town Centres) (CS20 Education & Personal Development) (CS24 Transport & Movement) (CS25 The River Medway) (CS26 Strood) (CS27 Rochester)
(11) Nurture Medway's rural areas & economy via village improvements and enhanced land management (CS6 Preservation & enhancement of Natural Assets) (CS7 Countryside & Landscape) (CS8 Open Space, Green Grid, & Public Realm) (CS17 Economic Strategy) (CS18 Tourism) (CS19 Retail & Town Centres) (CS24 Transport & Movement) (CS30 Rainham) (CS31 Hoo Peninsula & the Isle of Grain)	(12) To make the new settlement at Lodge Hill a model for modern living with high design and sustainability standards (CS17 Economic Strategy) (CS33 Lodge Hill)
(13) Minimise effects of climate change (CS3 Mitigation & Adaption to Climate Change) (CS4 Energy Efficiency & Renewable Energy) (CS33 Lodge Hill)	(14) Ensure sufficient supply of minerals and adequate waste management/disposal (CS22 Provision of minerals) (CS23 Waste Strategy)

4. Cross Cutting Themes

Introduction

- 4.1 This chapter covers a range of over-arching topics or themes that need to be taken into account if the Core Strategy vision is to be realised and national policy reflected in relation to matters such as climate change and the protection of environmental and heritage assets. The topics covered are:

- Regenerating Medway
- Quality and Sustainable Design
- Mitigation and Adaptation to Climate Change
- Energy Efficiency and Renewable Energy
- Development and Flood Risk
- Natural Environment and Biodiversity
- Sustainable Communities.

Regenerating Medway

- 4.2 Completing the effective regeneration of Medway's town centres and urban waterfront, including making Chatham a centre of regional significance, is the single biggest challenge facing the area and is therefore the priority for this Core Strategy. Medway has embraced the Thames Gateway project and made enormous strides in attracting resources and managing change on the ground but much still remains to be done.
- 4.3 Chatham, as Medway's main centre, needs a much more positive image and to assert itself as a focus for economic, social and cultural activity. Enormous efforts, including major financial investment, have been put into the land assembly of key waterfront sites and a programme of major infrastructure improvements.
- 4.4 A stage has now been reached where market perceptions have improved and community confidence is growing. However there is much still to do if the enormous potential is to be fully realised and Medway is to be recognised as one of the most significant conurbations in the greater South East and a strategic centre within the Thames Gateway area.
- 4.5 A changed focus now could also result in the returns expected from the financial investments already made being reduced or lost altogether. Accordingly, Policy CS1 re-emphasises the importance of this regeneration programme and the key measures that will be applied to take it forward.
- 4.6 A range of development briefs and masterplans are in place to assist in this process and these will be reviewed and updated as necessary over the plan period. A schedule of these is set out at Appendix B. The Council will work proactively with potential development partners, both public and private, to realise opportunities and coordinate activity.

Policy CS1: Regenerating Medway

The development strategy for Medway is to prioritise re-investment in the urban fabric, particularly by the redevelopment and recycling of underused, derelict and previously developed land with a focus on the Medway Riverside and town centres.

To achieve this, priority will continue to be given to the established regeneration programme, namely:

- Major physical change in Chatham centre, including significant new retail floorspace between Best Street and the Brook and the expansion of the Pentagon Centre, mixed use developments at the Brook, the Station Gateway and Waterfront, major improvements to the Waterfront open space and, over the longer term, the development of a new cultural offer in this location
- On the west bank of the River Medway the creation of a dynamic new mixed use waterfront environment stretching from Medway Valley Park through Temple Waterfront, the former Civic Centre site and Strood Riverside. This will include the implementation of the Masterplan for Central Strood and associated access improvements and the creation of a river walk
- On the east bank of the river, the creation of a new community at Rochester Riverside, the sensitive regeneration of the historic area between Star Hill and Sun Pier, the further development of the Chatham Historic Dockyard as a heritage destination and commercial quarter, development of the Interface Land and the completion of the residential communities at St. Mary's Island and Gillingham Waterfront
- Sensitive change within Gillingham town centre to reinforce its role as an important 'District' centre and capitalise on the opportunities provided by the growing student population and new facilities at Medway Park and the Great Lines Heritage Park
- By working with Network Rail and the train operating companies the creation of enhanced station environments and interchange facilities at Strood, Rochester, Chatham and Gillingham
- The creation of a high quality public realm, including new public squares and spaces, new pedestrian routes connecting up the waterfront and town centres and major urban open spaces.

The Council will continue to work in partnership with all relevant bodies and commercial interests in taking forward the programme and all developments will be expected to make a positive contribution to it.

Quality and Sustainable Design

- 4.7 Medway has a unique architectural and historic character, which is enhanced by an outstanding landscape of estuarine flood plain backed by the steep escarpments and hanging valleys of the North Downs. There is a legacy of landscape and townscape views of the escarpments, the river, and key landmarks of national and international importance such as Rochester Cathedral and Castle and Chatham Historic Dockyard.
- 4.8 However, the demise of the Naval Dockyard and the disappearance of traditional industries have also left Medway with large riverside sites in need of regeneration. 1970's traffic and redevelopment schemes have also damaged the once coherent character of the towns. The scale of regeneration presents a significant challenge, but also an incredible opportunity to transform Medway into a city for the 21st Century.
- 4.9 If the regeneration, described above, is to reach its full potential good design will be critical in:
 - Making the most of Medway's character and setting
 - Making Medway a good place to live and work
 - Forging a new and exciting image for Medway as a whole.
- 4.10 It is important that this is achieved both on a building-by-building basis and on the scale of new and existing areas with streets and spaces that have their own distinct character whilst being integrated with the rest of the built environment.
- 4.11 The scale of regeneration is such that it will impact on Medway for generations to come. It is therefore important that new development is designed to ensure long-term viability and to reduce future obsolescence in the face of changing economic, demographic and social trends. Good urban design, by ensuring easy connection to open space, recreational facilities and local services, has an important role to play in enabling sustainable life styles that are less car dependent.
- 4.12 Meeting these challenges can be achieved through an understanding of the principles of urban design that underpin most successful places. These are laid down in the Government publication '*By Design- Urban Design in the Planning System*' www.cabe.org.uk/publications/by-design . The Government's latest '*Building for Life*' standards www.buildingforlife.org also provide a range of criteria for better housing design. To ensure that developments meet the criteria laid down in these, the Council will carry out Building for Life Assessments for all schemes of 25 dwellings or more.
- 4.13 In applying these general criteria and principles, designers should take into account the unique features of each site (including its context). For significant regeneration sites (100 dwellings or more, over 10,000 m² of commercial development, or sensitive sites that will be visible or prominent within the surrounding area or in close proximity to important heritage assets), good design will best be ensured by agreeing basic design principles with the Council. These should normally be set out in a

design statement or brief that, in appropriate cases, is subject to community consultation prior to a planning application being submitted.

- 4.14 Tall and bulky buildings present a particular challenge. The Council's adopted Building Heights Policy (2006) defines riverside areas where tall buildings will, or will not be acceptable. It also lays down a methodology for determining the detailed acceptability of tall buildings and their effect on strategic views and landmarks. The Council will continue to use this in assessing proposals for buildings that are 18m or more in height or which impact on strategic views.

Policy CS2: Quality and Sustainable Design

New buildings in Medway will be expected to meet the highest architectural standards that reflect or generate local distinctiveness through:

- The expression of function and structure
- The use of materials
- Appropriate proportions, visual order and detailing
- The application of environmental criteria.

New development should result in buildings, streets, spaces and neighbourhoods, which are high quality, durable and well integrated with their surroundings by:

- Respecting strategic and local views and settings
- Respecting local context, townscape and landscape - including the character, scale, street and settlement patterns of the surrounding area
- Contributing to the enhancement or creation of local identity
- Creating a pattern of streets and spaces which are well connected to their surroundings and which are attractive and easy to walk through
- Being flexible and adaptable to meet a variety of needs, uses and lifestyles into the future.
- Contributing to a pattern of development, which provides easy access to open space, recreational facilities and local services, and which encourages walking and the use of public transport.

In meeting the above the Council will expect designers to have regard to the objectives for urban design as laid down in the Government's publication 'By Design'. It will also measure the quality of new housing development against the Design Council CABI 'Building for Life' Criteria.

The acceptability of tall buildings (18m or higher) and the protection of strategic views will be determined in accordance with the Council's Building Heights Policy 2006.

Applications for major sites (25 houses or more) should be accompanied by:

- An 'Accessibility Assessment' which demonstrates adequate access for residents to necessary services, integration with existing development and that unnecessary travel demands do not arise
- A design statement outlining how the development accords with:
 - The objectives of 'By Design'
 - Building for Life Standard for housing development; and
 - How the local physical, social, environmental and policy context has been taken into account at the design stage.

Applications for significant regeneration sites, large, or sensitive sites should be accompanied or preceded by a design brief that is subject to a public consultation process.

Mitigation and Adaptation to Climate Change

- 4.15 Climate change and its potential effects is one of the greatest issues affecting humanity. Extreme heat and flooding can threaten human life and flooding can cause major property damage. Higher average temperatures affect both flora and fauna and sea level rise threatens coastal areas. The Government has introduced a number of measures to address the issue, including measures that should be considered in local development frameworks. Through PPS1 and its climate change update, sustainable development, adaptation to climate change and mitigation are now key cornerstones of planning.
- 4.16 A well-known and recognised contributor to climate change is carbon dioxide emissions, sometimes referred to as the carbon footprint of an area. Therefore a critical part of any strategy for tackling climate change needs to deal with this issue.
- 4.17 A detailed explanation of Medway's ecological footprint is contained within the Climate Change, Renewables and Flooding State of Medway Report.
- 4.18 A Local Area Agreement target sought a reduction of emissions by 13.9% by 2011, equating to 4.3 tonnes of CO₂ per capita. Further and more stringent targets are likely to be applied to Medway over the plan period. A related issue is that of air quality and the Council has, and will continue to, support the Kent and Medway Air Quality Network over the plan period. This will include the monitoring of air quality at key locations to determine if air quality is worsening as a result of new development and identifying actions to mitigate this. The Council will also support opportunities for a wider approach to the management of air quality by working in cooperation with adjoining authorities.
- 4.19 In order to improve the sustainability of new homes, the Government has introduced The Code for Sustainable Homes. This rates new homes against nine measures of sustainability: CO₂, pollution, water, health and well being, materials, management, surface water run-off, ecology and waste. The code uses a 6 level rating system, according to the degree to which the homes measure up to the 9 measures. The previous Government set a target for all new homes to achieve a Level 3 rating by 2010, progressing to a Level 6 (or zero carbon) rating by 2016. The

current Government has confirmed a commitment to zero carbon homes by 2016. However the definition of zero carbon is being amended to remove the requirement for Level 6 of the Sustainable Homes Code and replace it with amendments to Part L of the Building Regulations, coupled with off-site 'allowable solutions', for example contributions to carbon reduction projects in the community. Details of the scheme are not yet finalised.

- 4.20 The Building Research Establishment operates a similar system for non-residential development called the BREEAM standard. This rates buildings as either pass, good, very good, excellent or outstanding. The Government has set a timescale for non-domestic buildings to be carbon zero by 2019, with the exception of schools and public sector buildings where the timescale is 2018. No intermediate targets have been set for non-domestic buildings.
- 4.21 It is widely recognised that some climate change is now unavoidable, with a resulting need to start adapting now to the predicted impacts that are likely in the future. For the South East of England predicted impacts include sea level rise, increased flooding, impacts on water supply, agriculture and fragmentation of habitats. One result of increased development and levels of greenhouse gas emissions is what is termed the Urban Heat Island Effect (UHIE). This is the difference between rural and urban temperatures, which has been shown to be up to 7°C. This happens where increased levels of solar absorption and radiation occur and transport, heating and cooling systems as well as industry all add to city heat. In heatwave conditions this can have serious health implications, particularly for the elderly and the infirm. It has been recognised that there are a number of actions that can help mitigate the impact of UHIEs. These include the use of 'green' roofs, urban tree planting, shading through design, passive heating and ventilation systems and preserving urban open spaces and gardens.
- 4.22 Water supply in Medway is largely dependent on ground water abstraction from local sources or imported water from the Medway Water Resource Zone, which extends into mid Kent. There are no large reservoirs or any abstraction from the river within the Medway administrative area. The demand for water is rising from both existing and new development and with increasingly erratic rainfall patterns there is widespread concern over the stability and sustainability of future supplies.
- 4.23 In simple terms Medway is one of the driest parts of the most water 'stressed' region in the country. Some of Medway's highest value ecological areas are along marshland and shorelines and reduced water supply also has implications for the functioning of these areas.
- 4.24 The Southern Water Final Water Resources Management Plan for 2010 to 2035, proposes a number of measures to ensure an adequate water supply to the area. These include universal metering to manage demand, improvement schemes for groundwater sources, optimisation of inter-zonal transfers, renewal of inter-company bulk water transfer schemes, licence variations, leakage reductions, wastewater recycling and raising Bewl Water. The Council supports all of these measures, although many of the required improvements will occur outside the administrative area.

- 4.25 The Water Framework Directive applies to all types of groundwater, including rivers, lakes, estuaries, wetlands, ground and coastal waters. The Directive aims to push the proportion of water bodies in good ecological status (GES) from 26% in 2011 to 32% by 2015 and then to get as many as possible of the UK's water bodies to this status by 2027. The Council will support these objectives by ensuring the timely delivery and capacity of infrastructure to serve new development and the proper integration of Sustainable Urban Drainage systems and/or water neutral developments.

Policy CS3: Mitigation and Adaptation to Climate Change

All development will be expected to take full account of its potential impact in terms of climate change and demonstrate that appropriate mitigation and adaptation strategies have been put in place to limit these impacts.

All residential development will be required to contribute to the progression to sustainable and zero carbon homes by 2016 through meeting the following requirements:

- **Code Level 4 until the end of 2013**
- **Code Level 5 between 2014 and 2016**
- **From the beginning of 2016 Code Level 5 plus any additional requirements needed to meet the Government's definition of Zero Carbon (potentially Part L of the Building regulations) plus 'allowable solutions'.**

In addition all residential developments should achieve water efficiency of no more than 80 litres per person per day.

Commercial buildings over 1,000 sq m will be required to meet the BREEAM "very good" standard until 2016 and thereafter BREEAM 'excellent', progressing to the Government's definition of Zero Carbon by 2019.

Developments will also need to demonstrate that the following measures have been adopted, where appropriate:

- **Limiting the embodied energy of materials used in construction**
- **Maximising thermal efficiency and limiting the need for mechanical heating and cooling systems**
- **Countering urban heat island effects, including through the provision of greenspaces and roofs, planting and intelligent design**
- **The application of National Sustainable Urban Drainage Systems Standards**

The Council will support the proposals in the Final Water Resources Management Plan, 2010-2035 or other measures that have been agreed through cross boundary working to improve the

efficiency of water use and maintain supplies at the level required to meet local needs. It will also support the objectives of the Water Framework Directive for water bodies to reach a Good Ecological Status by 2027.

The Council will continue to support the work of the Kent and Medway Air Quality Network, including through the monitoring of new development and in collaboration with adjoining authorities.

Energy Efficiency and Renewable Energy

- 4.26 Medway has a strategic role in supplying power and heat to the region and the country as a whole (e.g. around 15% of the nation's electricity) but this is currently almost wholly from conventional sources. In order to assess Medway's potential in terms of renewable energy the Renewable Energy Capacity Study 2010 was commissioned³.
- 4.27 This shows that there is potential for the Medway area to generate around 641MW of power or heat equivalent using renewable sources. It indicates that this could be provided through a number of technologies, covering wind (both small and large scale), biomass, solar and district heating. The largest proportion could come from wind developments of varying scales but this would involve the use of locations across the middle of the Hoo Peninsula, which are sensitive both environmentally and visually. Other technologies, especially photovoltaics or solar thermal could be spread across a number of concentrated areas through the main centres.
- 4.28 A number of the available technologies only tend to become viable on larger scale developments. Combined heat and power systems usually need a demand at a community scale to be cost effective. Others such as ground source heat pumps are often constrained due to the land surface that is usually demanded to accommodate them, although this has lessened with vertical systems being introduced as alternatives.
- 4.29 To consider the impact on scheme viability of applying higher sustainable code levels and the impacts of including renewable technologies, the study specifically considers the strategic sites of Rochester Riverside, Chatham Centre and Waterfront and Lodge Hill. It discusses potential mixes of technologies that could be used over the plan period, on the basis that these schemes will all come through during and after the national timetable for zero carbon homes.
- 4.30 If the Government grants permission for the proposed new coal power station at Kingsnorth, it is expected to include Carbon Capture and Storage. In addition the Council has recommended that, if approved, a condition be applied requiring pipes to be laid to the edge of the site, which could be connected for waste heat to be used as part of a district

³ http://medway.gov.uk/pdf/renewable_energy_capacity_study_may_2010.pdf

heating system. This could potentially be of a significant scale due to the volume of waste heat available.

- 4.31 The greatest constraints to a speedy development of a district heating system would be the commitment of the utility companies and current legislation and processes, which are not geared towards large scale district heating schemes. However the study suggests that this is a key element that should be further investigated.
- 4.32 Due to the large size of the existing housing stock and the nature of commercial and industrial activity across the area, simply controlling new development will not, in itself, be enough to result in a significant reduction in CO² emissions. As a large proportion of the building stock is older and of variable quality, there are issues in terms of bringing it up to new thermal standards. Retrofitting will be neither cheap nor easy in many cases and a very high proportion is privately owned, making it difficult to implement area wide improvement programmes.
- 4.33 The ability to implement significant improvements will be heavily influenced by the national picture and the application of consistent standards. Nevertheless the Council will continue to actively seek out opportunities and apply standards that have net benefits but do not endanger the regeneration programme.
- 4.34 It will also positively respond to any opportunities to work with Government to prove the potential for large-scale district heating, including as a national demonstration project area.
- 4.35 Renewable energy provision is a welcome and necessary part of the programme to increase the sustainability of the UK economy and housing market. However the maximum benefits to sustainability come from reducing the demand for energy in the first place, before considering how the remaining requirements are generated and distributed. The energy hierarchy gives the following order of priority:
 - Energy conservation through design
 - Energy efficiency through building fabric
 - Efficient supply of energy
 - Renewable and low carbon energy generation

Policy CS4: Energy Efficiency and Renewable Energy

All new development will be expected to maximise energy efficiency savings through passive design and building fabric improvements. Developments of 10 dwellings or more, or over 1,000 sq m of non-residential floorspace should also meet 20% of the residual on-site energy requirements from decentralised, renewable energy sources. Direction for which technologies would be most appropriate should be taken from the Medway Renewable Energy Capacity Study, although emerging and innovative technologies will also be supported. If it is demonstrated that this target cannot be met economically through on-site measures, equivalent CO² savings will be sought through compensatory off-

site measures including renewable energy schemes and retrofit schemes for existing buildings in the local area.

Should it prove feasible to do so, the Council will promote large-scale district heating schemes that use waste heat from conventional power generation. Subject to there being no significant adverse effects in terms of the natural environment and residential amenity, the Council will support and promote the installation of all forms of renewable energy systems including small scale generation.

Development and Flood Risk

- 4.36 As sea levels rise and extreme weather events become more common it is vital that all developments are appropriately designed to withstand these factors and sufficient space is made for floodwater. Where development is unavoidable next to rivers and the coast, as is the case in much of urban Medway, a range of sustainable flood risk management measures should be incorporated. Depending on the location these could include a mixture of formal flood defences, land raising, flood resilience and flood resistance measures. Outside the main urban area the location and style of coastal defences will need to take account of 'coastal squeeze' so that internationally important habitats are not eroded or lost altogether.
- 4.37 Managing our undeveloped areas appropriately is also essential by maintaining watercourses and flood storage areas and providing sufficient space and protection for flora and fauna to adapt and migrate in the face of rising temperatures.
- 4.38 The Environment Agency produces flood maps, which identify three zones of risk: zone 1, low probability, zone 2, medium probability and zone 3, high probability. These are shown in Figure 4.1. Medway is located at the confluence of the Thames and Medway estuaries and large tracts of marshland to the north of the urban area are at high risk of flooding (Zone 3). These include the low lying land to the north, east and west of Cliffe and most of the land to the east of Allhallows and Stoke. Most of the industrial land at the Isle of Grain and Kingsnorth also lie within flood zone 3 but will need to be actively defended due to the nationally important infrastructure there.
- 4.39 On the south side of the Medway, most of St. Mary's Island, Chatham Dock and the Gillingham waterfront and the lower lying parts of the historic dockyard are in Zone 3. The floodplain continues, to include the Star Hill to Sun Pier area and Rochester riverside. The latter contains a smaller area of low to medium risk (Zone 2). On the north bank, most of the Medway City Estate falls within Zone 3 with small areas in Zone 2. A similar pattern occurs in Strood town centre. The Hogmarsh valley also lies within Zone 3. However as currently defined these flood zones do not take account of existing defence structures, for example as at Rochester Riverside, which now has full flood protection.

- 4.40 To the south of the urban area, the largest area within Zone 3 is on the east bank of the river, on Wouldham Marshes, whilst smaller areas occur on the west bank to the north of Cuxton station and to the north of Halling.
- 4.41 The Medway Estuary and Swale Shoreline Management Plan and the Thames Estuary 2100 Plan set out the constraints to development that need to be accounted for in terms of flooding and coastal erosion. They consider the situation over the next 100 years. The policy is to 'hold the line' along most of the coastline on both sides of the Medway. This applies to all areas where there are either residential properties, industrial or infrastructure installations.
- 4.42 In addition, there are limited lengths of coast where a policy of 'managed realignment' is to be applied. In these areas local strategies will be developed to set back the existing defences to allow more space for flood storage and inter-tidal habitats. However these may not be implemented for 50 years or more. Areas affected include the edge of Allhallows, some of Allhallows Marshes and some of the northern area of Grain Marsh.
- 4.43 There are also very limited sections where it is proposed there should be 'no active intervention', meaning that there will be no investment in coastal defences and natural processes will be allowed to take over.
- 4.44 The Thames Estuary 2100 Plan (TE2100) outlines the recommendations for flood risk management for London and the Thames estuary through to the end of the century. As part of this, models have been developed that outline the expected impact of certain rises in sea level, to ensure the resilience of the Plan to climate change along the estuary. Therefore it puts climate change adaptation at its core. It is expected that this will be given the same weighting as a Shoreline Management Plan (SMP). There are two SMPs that cover the coast around Medway. These are the Medway Estuary and Swale SMP and the Isle of Grain to South Foreland SMP.
- 4.45 It has been calculated that over the next century up to 1200 hectares of designated intertidal habitat in the TE2100 plan area could be lost through the effects of coastal squeeze and which will have to be replaced. The three areas (out of seven in total) identified as potential locations for suitable replacement habitat on the Kent side of the estuary all fall within the Medway area. These are Cliffe Marshes, Cooling Marshes and High Halstow Marshes but the Environment Agency has yet to determine which areas might be selected and may not do so until later in the century.
- 4.46 This is already causing considerable uncertainty and could affect a range of countryside access and improvement projects. Accordingly the Council has and will continue to press the Environment Agency to address this issue as soon as possible. It will also work positively with the Agency to both identify and implement appropriate solutions.
- 4.47 Sustainable drainage solutions for new developments can cover a number of potential design solutions from the positioning of elements within a development and the choice of materials used, through to more engineered solutions such as the inclusion of swales. However, due to the differing geology across the area, it will not always be practicable to

take such approaches. They do not solve all flooding issues but they are seen as having a number of advantages over more established solutions, particularly by reducing the potential for flash flooding. They can also have additional benefits such as the reduced need for water treatment, as they allow a replication of routes for water across the river basin and the overall water system.

- 4.48 The Flood and Water Management Act 2010 creates SUDs (sustainable urban drainage systems) approval bodies, which will be unitary and county authorities. SUDs approval bodies will be required to approve SUDs in line with new national standards, which are currently being drawn up. Where SUDs drainage systems drain more than one property, the SUDs approval body will be required to adopt and maintain them.
- 4.49 A number of the key regeneration sites are located on the riverside and a strategic approach to their defence is appropriate. Accordingly the Council commissioned a study of the existing defences and the potential works and strategies that should be applied to ensure flood risk is managed sustainably⁴. This will ensure that all flood defences along the waterfront meet a universal standard. It is accepted that, although a large part of the urban waterfront is located within the flood plain, it needs to be defended due to the long established development form and the value of the commercial assets that would otherwise be at risk. Beyond the current urban boundaries however it is important to avoid inappropriate development that would increase flood risk and reduce the capacity to store water.
- 4.50 This approach will allow optimum solutions to be identified that balance the protection of sites with management of the natural environment.

Policy CS5: Development and Flood Risk

Proposals for development within flood zones 2 and 3 and on sites of over 1 hectare in zone 1 must be accompanied by a flood risk assessment. Permission will not be granted unless, following a flood risk assessment, it can be demonstrated that:

- It would not be at an unacceptable risk of flooding itself; and
- The development would not result in any increased risk of flooding elsewhere.

Exceptionally, sites within the Medway urban area, which contribute to the regeneration of the area, need to be redeveloped. In such cases development will only be permitted if:

- The development is designed to be compatible with potential flood conditions, and
- There are no alternative sites in a lower flood risk zone; and

⁴

<http://medway.gov.uk/PDF/Medway%20Flood%20Defence%20Strategy%20High%20Level%20Appraisal%20-%20FINAL%20-3%20Feb%202011.pdf>

- The development would make a significant contribution to the overall sustainable development objectives of the LDF, such that the wider sustainability benefits of the development outweigh the flood risk; and
- It can be demonstrated to the satisfaction of the Council and the Environment Agency that any residual flood risks are adequately mitigated to avoid an increased risk of flooding either on the site or elsewhere; and
- It is only for uses that are not defined as highly vulnerable by PPS25.

Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.

Proposals in areas at risk from flooding must demonstrate that account has been taken of the Medway Strategic Flood Risk Assessment (SFRA) 2006 and its addendum 2011, the resilience of buildings, infrastructure and other important local features.

Options to manage flood risk identified in the High Level Appraisal of the Potential Solutions to Manage Flood Risk in the Urban Medway⁵ should be incorporated where possible.

All developments, which have the potential to affect the ability of land to absorb rainwater, will be required to incorporate and obtain approval for sustainable urban drainage systems (SUDS) in line with national standards, prior to construction.

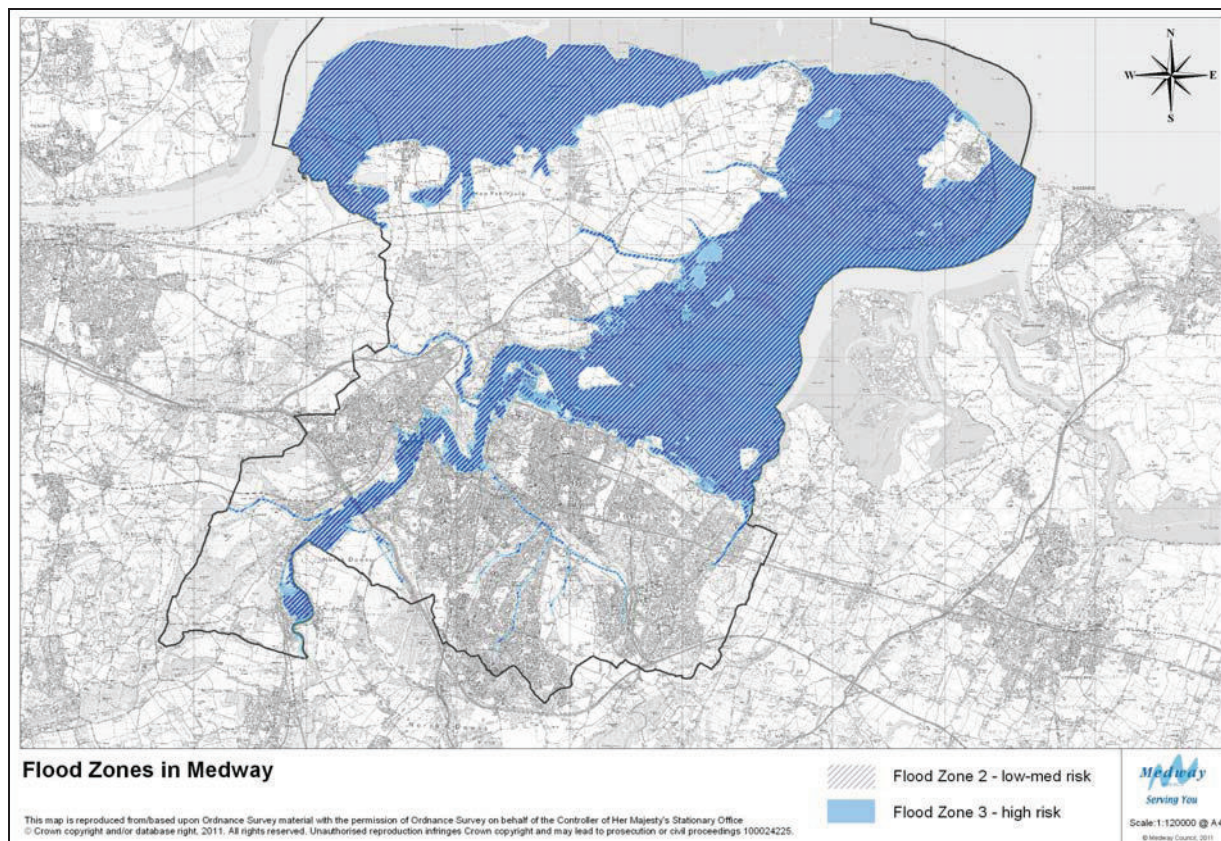
All development within flood zones 2 and 3 will require surface water run-off to be controlled as near to its source as possible.

Development will not be permitted which encroaches onto the natural floodplain beyond the current urban boundaries or which harms the stability or continuity of flood defences. Opportunities will be taken, in consultation with partner agencies such as Natural England and the Environment Agency, to create replacement intertidal habitat and reduce flood risk.

5

<http://www.medway.gov.uk/PDF/Medway%20Flood%20Defence%20Strategy%20High%20Level%20Appraisal%20-%20FINAL%20-3%20Feb%202011.pdf>

Figure 4-1 Flood Zones in Medway



Natural Environment and Biodiversity

Preservation and Enhancement of Natural Assets

- 4.51 Medway is fortunate in having an extraordinarily high proportion of internationally and nationally significant landscapes, including the Thames estuary and River Medway estuary marshes, the chalk grasslands of the Kent Downs and also its ancient woodlands. Highly valued local areas of nature conservation value, many of which are designated nature reserves, complement these. Medway has a relatively large number of parks within the densely built up areas, as well as a series of rural valleys, including Capstone Valley, Horsted Valley and Darland Banks. These extend far into the urban area and as well as providing physical links to the countryside beyond, act as wildlife corridors and informal recreational areas for adjoining neighbourhoods. It follows that Medway's open spaces and countryside have a critical role to play in helping to deliver sustainable development.
- 4.52 The proximity of these valuable sites to the urban area and their visitor potential poses particular challenges. Built development can lead to the fragmentation of habitats and high visitor numbers can damage the quality of designated areas. There is a specific concern that access to the most sensitive sites, including Special Protection Areas and Sites of Special Scientific Interest needs to be actively managed to avoid disturbance to wildlife from visitor numbers. To address this problem the Council is contributing to ongoing research into the effects of disturbance on bird populations being led by the North Kent Environmental Planning Group. This will inform measures to manage access and the development of mitigation strategies that could include the provision of Strategic Alternative Green Spaces and site level visitor management.
- 4.53 Planning Policy Statement PPS9 'Biodiversity and Geological Conservation', recognises that sites of international importance for nature conservation are separately protected by European Habitat Regulations and therefore do not require specific policies in local development frameworks. However, a high degree of protection should be given to Sites of Special Scientific Interest (SSSIs) whilst regionally important geological sites, local nature reserves, local sites, ancient woodlands and single "veteran" trees should be safeguarded from development.
- 4.54 In addition to individual sites, the importance of networks of natural habitats is recognised as they can provide routes or stepping stones for the migration, dispersal and genetic exchange of species. Local authorities are required to protect, strengthen and extend them. This is particularly important as climate change puts pressure on established habitat areas. Many of Medway's habitats also form part of a wider ecological network across North Kent and the greater Thames estuary. Given this there is added value in working at a landscape scale with partners in adjoining areas to manage habitats strategically. The Biodiversity Opportunity Areas developed by the Kent BAP Partnership identify sites for habitat creation schemes based on their potential to extend and connect key landscapes, such as chalk grassland and salt marshes.

- 4.55 A consultation paper on Planning for a Natural and Healthy Environment, published in March, 2010, requires local development frameworks to set out policies for the conservation, restoration, enhancement and enjoyment of the natural environment and include criteria-based policies against which to judge proposals for development on or affecting nature conservation sites. The policies below aim to meet those requirements.
- 4.56 The Medway Estuary and Marshes and the Thames Estuary and Marshes are both Special Protection Areas and Ramsar sites. Both areas form part of the Greater Thames Estuary Natural Area defined by Natural England. They are wetlands of international importance comprising intertidal habitats, saltmarsh, coastal grazing marshes, and saline lagoons and lagoon type habitats.
- 4.57 Special Protection Areas and Special Areas for Conservation (SACs) provide increased protection to a variety of wild animals, plants and habitats and all such sites are also SSSIs. There is only one SAC in Medway in the Medway Valley near Upper Halling. This forms a small part of the North Downs Woodlands SAC, the majority of which lies within Gravesham.
- 4.58 There are eight Sites of Special Scientific Interest (SSSIs) in Medway. These are:
- South Thames Estuary and Marshes;
 - Medway Estuary and Marshes;
 - Cobham Woods;
 - Northward Hill;
 - Dalham Farm;
 - Chattenden Woods;
 - Tower Hill to Cockham Wood;
 - Halling to Trottiscliffe Escarpment.
- 4.59 Regionally Important Geological and Geomorphological Sites (RIGS) were established in 1990 by the Nature Conservancy Council and are selected by local, voluntary RIGS groups.
- 4.60 RIGS do not have the formal, statutory, protection afforded to SSSIs but their importance is recognised in national planning policy PPS9 and criteria based policies are required to be included in local development documents to enable the impact of development upon them to be judged.
- 4.61 The Kent RIGS Group notified Medway Council of four sites in its area at Halling, Cliffe and Fort Amherst in 2006.
- 4.62 Local Authorities designate Local Nature Reserves. They must be in the ownership or otherwise under the control of local authorities. They should be of high natural interest in the local context (SSSI or near equivalent) or of some reasonable natural interest and be of high value for environmental education or research or for the informal enjoyment of nature by the public and capable of being managed with the conservation

of nature and/or the maintenance of special opportunities for study or research as a priority.

- 4.63 There are currently eight Local Nature Reserves in Medway at Baty's Marsh, South Wood, Berengrave Chalk Pit, Rainham Dock (east), Darland/Ambley Wood, Darland Banks, Foxburrow Wood and Levan Strice. Medway Council has identified a further 15 sites which it intends to designate as Local Nature Reserves.
- Chestnut Woods
 - Coney and Daisy Banks
 - Dargets Woods
 - Darland Banks
 - East Hoath Wood
 - Hook Wood
 - Horsted Farm/Ridgeway
 - Mill Hill Wood
 - Rede Common
 - Sindal Shaw
 - Watts Meadow
 - Princes Park
 - Riverside Country Park
 - Capstone Country Park
 - Ranscombe Farm Reserve
- 4.64 In addition to National and Local Nature Reserves, other nature reserves may also be established independently from Natural England and the local authorities. In Medway, the Royal Society for the Protection of Birds purchased Cliffe Pools on the Hoo Peninsula in 2001 and is developing visitor and education facilities. This is a winter roosting site for thousands of birds. The RSPB also manages the national nature reserve at Northward Hill and its management is linked to that for Cliffe Pools.
- 4.65 It is recognised that the protection and conservation of sites of significant nature conservation interest outside the network of statutorily protected sites is essential to the maintenance of the UK's natural heritage. Such sites are identified as local wildlife sites and in Kent they have been known as Sites of Nature Conservation Interest (SNCI).
- 4.66 The Kent Biodiversity Partnership designates local wildlife sites and although the sites are not statutorily protected, they are generally recognised by local authorities, included in development plans and offered protection through policies in those plans.
- 4.67 In Medway there are seventeen local wildlife sites, which are identified as SNCIs in the Medway Local Plan, 2003. These are:
- Ambley and East Hoath Woods
 - Berengrave Pit
 - Bridge Woods, Burham
 - Cuxton Pit
 - Cuxton Wood (Mill Wood)
 - Darland Banks

- Grain Pit
- Great Lines
- Grove Wood
- Hook Wood, Walderslade
- Luton Banks
- Princes Avenue
- River Medway and Marshes, Wouldham
- River Medway between Cuxton and Temple Marsh
- South Hill and Houlder Quarry
- South Wood
- Yaugher Woods

- 4.68 Ancient woodlands are those where there is believed to have been continuous woodland cover since at least 1600 AD. Ancient semi-natural woodland is composed of native trees that have not obviously been planted, although it may have been managed by coppicing or felling and allowed to regenerate naturally. Planted ancient woodland sites are ancient woods in which the former tree cover has been replaced, often with non-native trees. Important features of ancient woodland often survive in many of these woods, including characteristic flora and fauna, and archaeology.
- 4.69 PPS9 requires local planning authorities to identify any areas of ancient woodland that do not have statutory protection and they should not grant planning permission for development which would result in its loss or deterioration unless the need for and benefits of the development outweigh the loss of woodland habitat.
- 4.70 All these areas of nature conservation importance are described in more detail in the Natural Assets and Open Space State of Medway Report and in the Medway Landscape Character Assessment. Wildlife is not restricted to designated and protected sites but it occurs throughout the countryside, coast and built-up areas of England. No parts of the country are without some wildlife interest. Consequently the following policies apply to the whole of the Medway area.

Policy CS6: Preservation and Enhancement of Natural Assets

Wildlife habitats and sites, populations of wild species and other biodiversity features will be protected, maintained and enhanced, especially through long term management and habitat creation schemes that increase connectivity and strengthen ecological resilience. This will be particularly the case where they have been identified as being of international, national and local importance and as priorities in the UK and Kent Biodiversity Action Plans, or where they are protected or designated under relevant legislation.

Development that causes unacceptable harm to important habitats and species through increased atmospheric, noise or light pollution will not be permitted unless it can be demonstrated that measures can be taken to overcome any significant risk.

The management of farming, agricultural land, forestry and woodland so as to conserve and enhance biodiversity will be encouraged.

When development is permitted, opportunities will be pursued and secured for the incorporation, enhancement, re-creation or restoration of wildlife habitat, either on-site, off-site or through contributions to the strategic provision of natural open space. Such strategies should be in place and functioning prior to commencement of the development.

Any negative impact on recognised wildlife habitats or other biodiversity features should be avoided or minimised through the appropriate siting and/or design of development. Where the negative impact cannot be avoided, but the importance of the development is considered to outweigh the impact, then environmental compensation will be provided by the creation by the developer of new habitats or features on other suitable sites and their long term management will need to be secured. Compensation will normally be provided on more than a like-for-like basis, in order to secure both the maintenance and enhancement of biodiversity.

As part of its commitment to ensuring the ongoing protection of SACs, SPAs and Ramsar sites the Council will:

- Implement the findings of the bird population and visitor studies commissioned by the Noth Kent Environmental Planning Group
- Ensure that any proposed strategic avoidance and/or mitigation measures are adopted in all planning documents and in the assessment of planning applications
- Adopt a flexible approach that enables development plan documents to be reviewed in the light of emerging evidence; and
- Deal with development proposals on a case by case basis, taking account of the potential for in combination effects, based on the best available evidence until the full results of the NKEPG studies are available.

It will also use a precautionary approach in requiring Habitats Regulations Assessment to be prepared where effects are uncertain.

Countryside and Landscape

- 4.71 Medway's distinctive sense of place is closely linked to its landscape setting. Its chalk hills and valleys, the Hoo Peninsula with its wooded spine and extensive marshes and the river and its estuary all play their part. Special Landscape Areas and Areas of Local Landscape Importance were designated in the Medway Local Plan, 2003. These reflected countywide and locally recognised areas of importance. PPS7 does not support local designations that may unduly restrict development and economic activity. When drawn up it considered that these designations

should be replaced by criteria based policies. However the Coalition Government has indicated that it will reintroduce a form of local designation. The Core Strategy consequently includes a policy that could replace the designations and applies it to the whole of the rural area rather than specific parts. However this approach may be adapted in light of the Government's proposals when details are available.

- 4.72 Medway adopted a Landscape Character Assessment in March 2011⁶, which is a spatially mapped strategy that supports this approach and provides an evidence base to inform decisions on planning applications in the countryside and urban fringe. It sets out a framework for protecting and enhancing the character and function of the area's distinct landscapes. It recognises that the landscape has been degraded in some places and sets out recommendations to restore and strengthen sites.
- 4.73 There were two special landscape areas. These were first designated in the Kent Structure Plan in the 1990's and incorporated into the Medway Local Plan 2003. The North Downs area coincided with the Kent Downs Area of Outstanding Natural Beauty, which continues in force and provides a high degree of protection. Parts of the North Kent Marshes special landscape area coincided with designated Ramsar sites and special protection areas, which are afforded international protection for their biodiversity.
- 4.74 There were 16 areas of local landscape importance which were not only designated for their landscape interest but also for the following reasons:
- As green lungs and buffers, helping to maintain the individual identity of urban neighbourhoods and rural communities
 - As green corridors (or links) for the community to reach the wider countryside
 - As edge or "fringe" land, needing protection from the pressures of urban sprawl: and
 - As habitats for wildlife and corridors, along which wildlife from the wider countryside can reach the urban environment.
- 4.75 All these functions are recognised in Medway's Landscape Character Assessment document, which in turn is the subject of the countryside and landscape policy. The Council's plans for strengthening green infrastructure networks and specifically the green grid corridors will also contribute to the realisation of the policy.
- 4.76 It is important that the distinctive character of the countryside is retained and enhanced while, at the same time, recognising that it is a living, working rural area. Both PPS4 and PPS7 allow for development in the countryside. PPS4 seeks to raise the quality of life and the environment in rural areas by promoting thriving, inclusive and locally distinctive rural communities, whilst continuing to protect the open countryside.

⁶ http://www.medway.gov.uk/pdf/Medway%20LCA%20Mar11_Main%20report.pdf ;
http://www.medway.gov.uk/pdf/Medway%20LCA%20Mar11_Appendices.pdf ;
http://www.medway.gov.uk/pdf/Medway%20LCA%20Mar11_Map.pdf

- 4.77 PPS7 recognises the role of planning in supporting and facilitating development and land uses which enable those who earn a living from the countryside to continue to do so, whilst continuing to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced. The focus for housing development is at existing settlements and housebuilding in the open countryside should be strictly controlled. The local exception to this is Lodge Hill for the reasons explained in Chapter 10.
- 4.78 PPG 2: 'Green Belts', states that the general policies controlling development in the countryside apply with equal force in Green Belts, but there is, in addition, a general presumption against inappropriate development within them. The guidance then goes on to define inappropriate development. Consequently, the Council will rely upon Policy CS7 and PPG2 to manage development in the Green Belt.
- 4.79 Paragraph 29 of PPS7, Sustainable Development in Rural Areas, allows local planning authorities to include policies in their local development documents to protect specific areas of best and most versatile agricultural land from speculative development. Medway has substantial tracts of this increasingly important resource on the Hoo Peninsula and to the north and east of Rainham in particular. Food security is a growing global issue and these areas are of particular importance for food production. Given that sufficient sites have been identified in Medway to meet development requirements without the need to use the best and most versatile agricultural land, the Council will seek to protect the main tracts from development and fragmentation.
- 4.80 The AONB Management Plan 2009-2014, prepared under the Countryside and Rights of Way Act 2000, contains policies adopted by all the local authorities in the Kent Downs, including Medway. The Council will take these into account when implementing Policy CS7.

Policy CS7: Countryside and Landscape

Sustainable development in the countryside will be permitted in accordance with the objectives and principles of PPG2, PPS4, PPS5 and PPS7 provided that:

- The openness and intrinsic character of the countryside is retained
- There is no significant erosion of the separation of individual settlements
- Urban sprawl is contained
- The highest degree of protection is given to the nationally designated Kent Downs Area of Outstanding Natural Beauty and its setting
- The individual landscape characteristics identified in Medway's Landscape Character Assessment are protected and, where appropriate, repaired, enhanced, extended and connected in accordance with the recommendations of

those assessments

- Access to the countryside and coast is maintained and enhanced and managed appropriately
- Important habitats are protected and the highest degree of protection is afforded to sites of national and international importance
- The objectives and proposals of the green grid strategy, including the maintenance of a network of habitats is not compromised and, where appropriate, enhanced
- The best and most versatile agricultural land, grades 1, 2 and 3a on the Agricultural Land Classification Map, on the Hoo Peninsula outside of the Lodge Hill strategic allocation, in the Capstone and Medway Valleys and to the North and East of Rainham, will be protected.

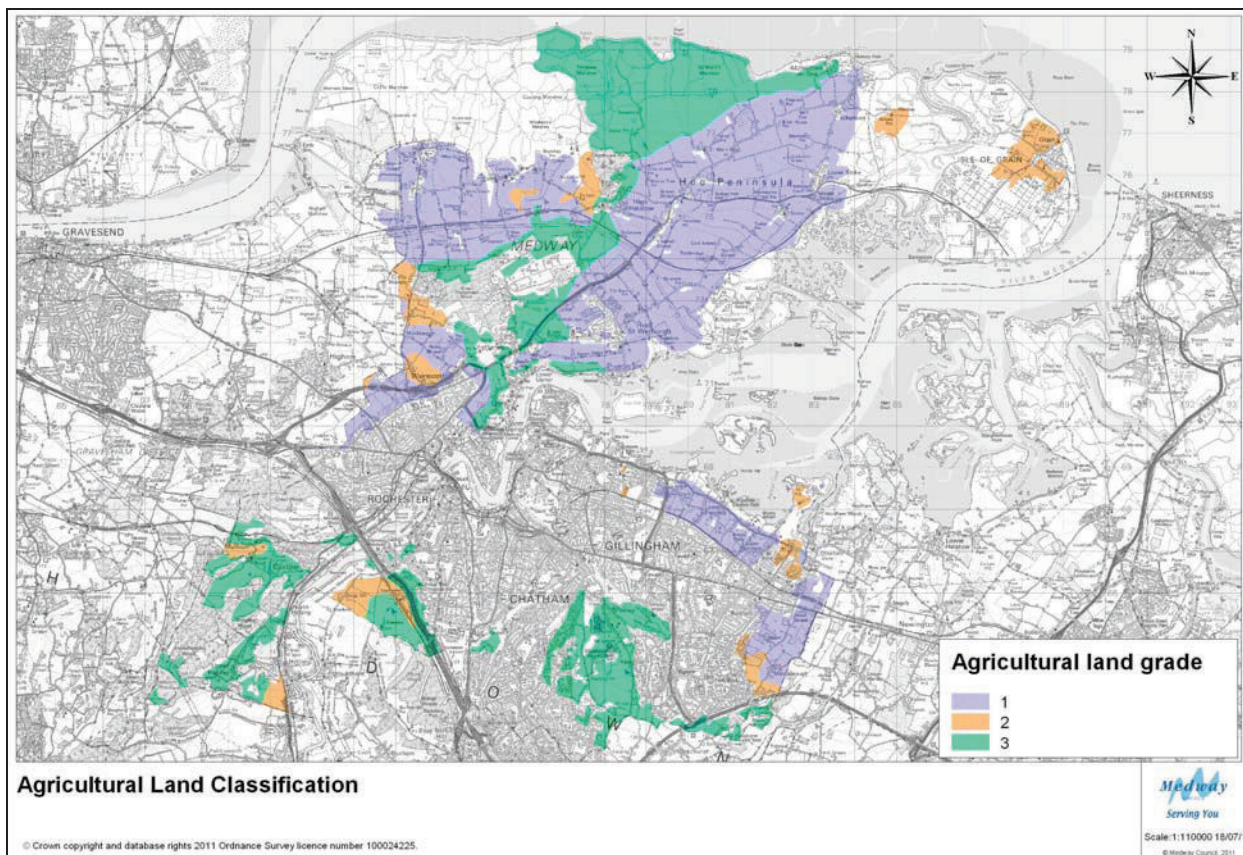
Planning permission will be granted for development provided that its design is appropriate to the character of the landscape. Appropriate designs of development shall accord with the characteristics of the type of landscape within which it is located, including having regard to and conserving:

- The landform and natural patterns of drainage
- The pattern and composition of trees and woodland
- The type and distribution of wildlife habitats
- The pattern and composition of field boundaries
- The pattern and distribution of settlements and roads
- The presence and pattern of historic landscape features
- The scale, layout, design and detailing of vernacular buildings and other traditional man-made features.

Existing features, which are important to the local landscape character, shall be retained, incorporated into the development and protected during construction work.

The Council will take forward the proposals in the Medway Landscape Character Assessment and the Green Cluster Studies when working with partners and developers to identify and implement landscape and habitat enhancement schemes.

Figure 4-2 Agricultural Land Classification



Green Infrastructure

- 4.81 The Government recognises the importance of greenspace to the quality of the environment, the conservation of biodiversity, the image of the Thames Gateway and to quality of life, including opportunities for healthy exercise, sport and recreation. It encourages a holistic approach to the greenspace network in order to provide a cohesive, multi-functional green infrastructure, which will enhance new built development and provide migration routes for wildlife, enabling greater resilience in adapting to climate change.
- 4.82 The term Green infrastructure is used to refer to the totality of urban and rural open space. It recognises the value that individual sites offer to wildlife and people, together with the opportunity for greater gains that derive from coherent, integrated networks of green spaces. Biodiversity and landscape are key features of green infrastructure. This section focuses on the strategic planning and delivery of open spaces. The public realm, such as civic squares and cycle routes in urban areas is a key part of the network in Medway. Green infrastructure planning promotes multi-functional open spaces, but it also recognises areas where there is a need to carefully manage access to avoid damage to the most sensitive environments.
- 4.83 There is a strong basis to the planning and delivery of green infrastructure in Medway. The area has played a major role in progressing key sites, such as the Great Lines Heritage Park and contributing to plans for

'Greening the Gateway' in north Kent. A number of projects have developed guidance and funded schemes to deliver specific elements of green infrastructure. These include the Cluster Study plans carried out by Greening the Gateway Kent and Medway, the Valley of Visions Landscape Partnership, and Kent Wildlife Trust's green infrastructure plans for the Hoo Peninsula and chalk grassland to the south of Medway.

- 4.84 The policy context for green infrastructure encompasses national planning guidance, promotion of best practice through statutory agencies, such as Natural England, and plans for the Thames Gateway that give the environment a prominent role in achieving successful regeneration.
- 4.85 Creating Sustainable Communities; Greening the Gateway, 2004 sets out a vision for the landscape of the Thames Gateway. It is a statement of intent within which more detailed strategies and action plans will fit. It is not a spatial strategy or a prescription for land use development on specific sites but it presents an exciting vision for the future.
- 4.86 The strategy aims to provide a framework for integrating the whole range of urban and rural open spaces into the regeneration process. It applies to formal parks, the grounds of schools and hospitals, the landscape around housing, canal and rail corridors, woodlands, wetlands, inter-tidal areas, wilder landscapes and the wider countryside. Farmland, business parks, development sites and domestic gardens also make a vital contribution to the greenspace network.
- 4.87 In Medway the Wildlife, Countryside and Open Spaces Strategy 2007 sets the framework for green infrastructure planning and promotes the Medway Green Grid. The Green Grid focuses on connectivity on strategic routes aiming to improve links between people, wildlife and green spaces, countryside and towns.
- 4.88 Medway's Green Grid seeks to develop strategic connections linking the key assets of its natural and historic environment with local communities, to promote a distinctive sense of place and underpin healthy, sustainable and vibrant living. Green Grid planning in Medway fits within wider strategic green infrastructure work across north Kent, coordinated through Greening the Gateway Kent & Medway. Strategic routes and projects flow across local authority boundaries into Swale, Gravesham and Tonbridge and Malling, to deliver effective and multi-functional use of natural resources.
- 4.89 Medway's Green Grid is defined under five broad geographical areas that reflect the distinctive characteristics of Medway:
 - Medway Waterfront – there is a strong focus on public realm in the centre of Medway, intrinsic to regeneration ambitions for the area, realising the connections to a riverside city with an enhanced environment and accessibility for pedestrians.
 - Hoo Peninsula – the key aim is to open up access to the high quality environment, characterised by the marshes bordering the Thames and Medway and the wooded ridge and open farmland across the wider peninsula. Green infrastructure planning is linked to plans for

developments, such as Lodge Hill, RSPB's reserves at Cliffe Pools and Northward Hill and work emerging from the Four Parishes Plan on the eastern side of the peninsula. The strategy seeks to protect the important natural environment, whilst enhancing sensitive access to the area, linking local villages and nearby towns with the peninsula, raising recognition of its value.

- Medway Valley – this area focuses on the area to the south of the M2 and follows the river and the landscape of the Kent Downs. Work here reflects the need to manage the protected landscape of the Downs and to improve opportunities for access, particularly along the banks of the river, linking Medway with Maidstone. The Valley of Visions Landscape Partnership is leading in delivering this work.
- Estuary and Orchards – this area in north Gillingham and Rainham reflects the landscape dominated by the estuarine location and traditional fruit growing areas. The strategy here is to restore and promote the landscape character and improve access for neighbouring communities to the natural environment.
- Great Lines to the Downs – this route connects Medway's landmark heritage park based around the Great Lines to the towns' backdrop of the Kent Downs. The aim is to develop and enhance the connections between local communities and the surrounding countryside, valleys and parks.

4.90 Green Grid is supported by a broad based partnership of statutory, voluntary and community organisations and has corporate involvement across the Council to coordinate planning work, funding and the delivery of projects. Delivery is also informed by and progressed through a number of other initiatives such as the Green Cluster studies and the Valley of Visions programme.

4.91 Greening the Gateway Kent and Medway produced a number of 'Green Cluster' studies to promote an ambitious vision for landscape enhancement across north Kent. Those in Medway cover:

- The Hoo Peninsula⁷
- Capstone to Bredhurst⁸

4.92 Two other Cluster studies are concentrated in adjoining authorities but by crossing into Medway, demonstrate the wider connectivity of the schemes. These are the Shorne to Shore Study and the Thames and Medway Canal Study. Both promote improvements to access from Medway to adjoining areas as part of a wider vision for enhanced opportunities to get into the countryside.

4.93 The Valley of Visions project is based in the Medway Valley south of the urban area in the Medway Gap between Medway and Maidstone. It is a

⁷ <http://www.gtgkm.org.uk/documents/hoo-brochure-1265037396.pdf>

⁸ <http://www.gtgkm.org.uk/documents/capstone-brochure-1265039144.pdf>

partnership scheme supported by the Heritage Lottery Fund. Its focus is on enhancing landscape and habitats, improving public access, promoting the area's historic heritage, and establishing strong links with local communities.

- 4.94 Kent Wildlife Trust is managing the Medway Smile Living Landscape Scheme to the south of Medway, together with local landowners and the local community, this aims to extend areas for nature and create a network of good wildlife habitats. The Four Parishes Plan on the eastern side of the Hoo Peninsula also promotes the Living Landscape initiative.
- 4.95 Parks and other open spaces are also a vital element of the green infrastructure resource. The open space network in Medway has been assessed in line with PPG17 guidance for its ability to meet the needs of local communities. The Council has used the findings of this work to develop standards for the provision and quality of a range of green spaces. These will be applied in the planning of new developments, and in progressing green infrastructure ambitions.
- 4.96 A high quality of public realm is essential in reinforcing Medway's assets such as the river and in making it an attractive, liveable and inclusive place. Redevelopment of Medway's large riverside and other brownfield sites offers opportunities to open up hitherto inaccessible areas, create new and attractive destinations for visitors and citizens and to extend access to the rural riverside by foot and cycle routes.

Policy CS8: Open Space, Green Grid and Public Realm

The Council will, subject to Policy CS6, seek to provide equal opportunities for all people to enjoy accessible, high quality, well maintained and affordable open space. It will ensure that:

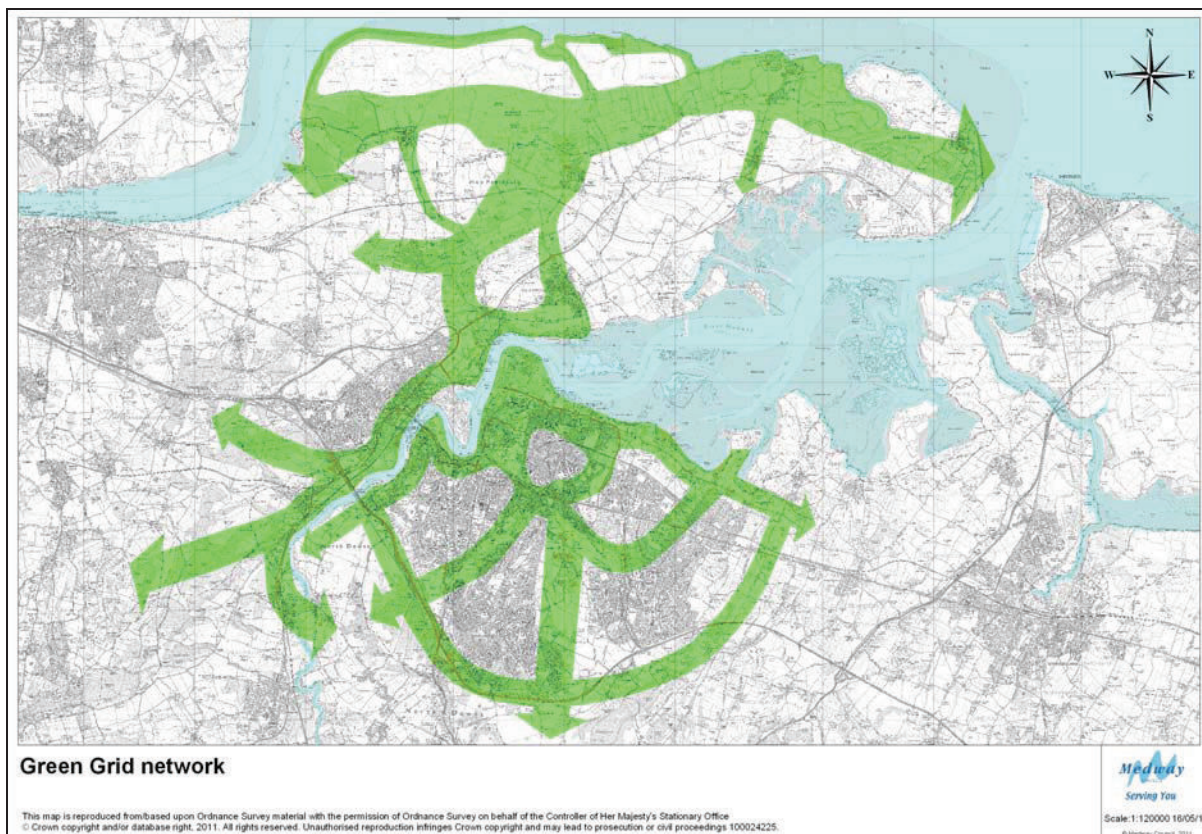
- A multifunctional network of open space will, as far as possible, connect to enhance landscapes and create a system of footpaths, cycle routes, equestrian facilities and wildlife stepping stones and corridors in a green grid which links the urban areas with five broad strategic corridors at Medway Waterfront, across the Hoo Peninsula, Medway Valley, the Estuary and Orchards and Great Lines to the Downs. These will be informed by the proposals in the Green Cluster Studies, Valley of Visions landscape programme and Living Landscapes project
- Opportunities will be taken to provide for open space, including habitats, either directly or in conjunction with development that contributes to the formation of the Green Grid and strengthens the wider green infrastructure network
- Existing open space will be preserved and poor quality open space enhanced unless an improved provision can be made by new development to the benefit of the local population
- A set of consistent open space standards will be established which will apply to new development throughout the council area
- Where open space cannot be provided on-site, alternative

equivalent provision of new open space or the enhancement of existing open space will be required off-site.

New or enhanced urban spaces should be provided as a part of major regeneration proposals. These should:

- **Ensure that all people can easily and comfortably move through and into developments**
- **Provide necessary recreational, amenity, and, where appropriate, civic space**
- **Be fully integrated with the rest of the development as part of an overall design approach**
- **Safeguard and enhance access to the riverside**
- **Create or maintain attractive and safe streets and public spaces.**

Figure 4-3 Green Grid Corridors



Sustainable Communities

Health and Social Infrastructure

- 4.97 One element of the vision of this Core Strategy is to seek better access to community infrastructure, for all residents of Medway. By community infrastructure we mean facilities such as affordable housing and community facilities, including public open space, sport and leisure facilities. The distribution of existing facilities is shown in the Infrastructure State of Medway Report (2009).
- 4.98 The Medway Sustainable Communities Strategy and Medway's Council Plan (2009 - 2012) place emphasis on the need to improve access to housing, jobs, services, transport and facilities for rural residents and disadvantaged groups throughout the area, and consider the needs of young people.
- 4.99 Consequently, the Core Strategy is about providing equal opportunities and access to good quality community infrastructure, sport and recreational facilities, cultural facilities and heritage assets, regardless of geography or personal circumstances, ensuring that actions benefit all sections of the community.

Deprivation

- 4.100 The Medway area has some disadvantaged neighbourhoods where communities are experiencing marginalisation and isolation as well as various social, personal, financial or other barriers, preventing individuals from accessing training, employment or local services. The Index of Multiple Deprivation indicates that 25 neighbourhoods in Medway count amongst the poorest 25% nationally, whilst Medway also has some of the wealthiest areas in the country. Pockets of deprivation are also present in rural communities.
- 4.101 Priority therefore needs to be given to social regeneration if all are to benefit from the scale of physical change envisaged. Accordingly the Social Regeneration Strategy aims to:
- Create a cohesive and inclusive community
 - Improve access to employment opportunities for all
 - Ensure physical improvements are accessible to all
 - Strengthen access to local community services by the most hard to reach communities
 - Improve access by local communities to local employment opportunities; and
 - Undertake a renovation programme of the poorest quality housing stock.
- 4.102 In taking the Strategy forward five priority areas have been targeted for Neighbourhood Action Plans. These areas are: All Saints, Brook Lines, Strood South, Twydall and White Road Estate. The Council proposes to add a further two areas, Luton and Gillingham North. A range of projects are being implemented in these areas, including: Strood Community Project, New Chalk Pit Community Park, refurbishment of the Beechings Way playing fields and many others.

Health

- 4.103 The Sustainable Community Strategy's vision for Medway is that its residents shall enjoy good health, well being and care. To enable this to happen, the strategy seeks to improve lifestyle, reduce health inequalities, improve mental health, and promote independence and quality of life for vulnerable and older people. The NHS Medway Board's 10 year vision is that, through partnership and participation, it will:
- Work to ensure that Medway will be a healthy, safe and exciting place with a good environment and major cultural attractions
 - Support the development of Medway into a city where people want to achieve in all aspects of their life, through work, leisure and learning
 - Deliver a vision of Medway based on sustainability principles with a better quality of life for everyone now and for future generations. This requires the integration of health, social, economic and environmental targets.
- 4.104 In 2007 the NHS Medway Board approved a number of principles around its property estate with the intention of incorporating them into a comprehensive estate strategy. The first is the development of community hubs providing access to health and other services leading to greater

integration. The second is to improve utilisation of accommodation. The final one is to improve training opportunities to impact positively on recruitment and retention. Other NHS Medway strategies have been instrumental in shaping this strategy. They include:

- A Healthier Medway (the 10 year strategy for the PCT)
- Strategic Commissioning Plan 2008 – 2013
- Primary Care Strategy 2009.

4.105 The main issues from the Estate Strategy 2010 – 2020 are:

- Ensuring good coverage for access to services by locating facilities appropriately
- A commitment to sustainable development i.e. maximise estate usage and occupancy and refurbishing unless a new build is the most appropriate option
- Working with local partners to embody the principles of “Total Place” in Medway in terms of asset use
- Ensuring GP practices are fit for purpose
- Working with NHS Medway and its delivery partner Medway Community Estates to enable them to develop and adapt their business.

4.106 At this time, there is considerable uncertainty with regard to developing additional health sites given the difficulties of ensuring sufficient funding is available. Inevitably, the disposal of surplus or redundant sites will be required in order to fund these. Facilities in the following locations may be affected by either enhancement or relocation schemes over the planning period: Canterbury Street, Gillingham, Chatham Town Centre, St Bartholomew’s Hospital, Chattenden/Hoo, Hempstead, Luton, Twydall, Wainscott and the Wayfield/Walderslade area. Other areas for consideration include: Rochester Riverside, Hoo Peninsula, Darland House, Elm House Clinic, New Road, Kings Road Clinic, Luton, Nelson Road, and Balmoral Road.

4.107 Premises are generally located appropriately across Medway but there is need for some development and some rationalisation within them. There is some under utilisation of buildings. There are areas of planned housing regeneration, which are currently under provided. Primary care services are provided from a range of facilities and the standard of GP premises requires significant investment to improve them.

4.108 Over the longer term there may be benefits from relocating services away from St Bartholomew’s Hospital to other local centres, but as yet there is no programme in place for this to happen.

4.109 Medway is served by one major hospital. Medway Maritime Hospital in Gillingham is the largest and busiest hospital in Kent. Some recent developments at the hospital include:

- The start of a major building development programme, which will see some of the hospital’s old blocks replaced with new, modern facilities

- The completion of some 250 new spaces to the car park; and
- The start of £1.5m investment in the emergency department over the next three years, which plans to move the emergency department to a new building on the hospital site as part of the Trust's major redevelopment plan.

4.110 NHS Medway is responsible for 68 GP practices. There are 125 GPs (and 60 part-time / locum GPs) serving the nearly 280,000 people in the NHS area.

4.111 There are also 10 healthy living centres and health centres in Medway. These are the base for a number of integrated health services and some community facilities. Some are also co-located with GP practices. The Medway NHS Foundation Trust provides Medway secondary care. It employs over 3,500 staff in a wide variety of clinical and non-clinical roles.

Adult Social Care

4.112 The adult social care services in Medway are currently undergoing transformation and modernisation. Adults fall into a number of service categories. These services are based on an individual's need; anything that enables that individual to be safe and be well. A revised older people's plan is being produced and has already identified programmes in a number of key areas that will help address the needs of Medway's growing older population.

Places of Worship

4.113 There are places of worship for Buddhists, Christian denominations, Hindus, Jews, Muslims and Sikhs as well as some for smaller independent faiths, but current provision is not thought to be adequate and more will be required. Faith groups are usually self funded but need support to find space for their congregations.

Voluntary Sector

4.114 Medway has in excess of 530 voluntary and community organisations, some of which are faith based. The Medway Council for Voluntary Service is an umbrella organisation, which offers a range of support services to the voluntary and community sector. In 2006 it developed a Local Infrastructure Development Plan for Medway's voluntary and community sector. It identified areas in which the sector needs to develop but recognised that the sector was strong.

Custodial Services

4.115 Amongst other things Medway has two prisons located within the local authority boundary, which are part of the HM Prison Service and a young persons unit managed by Rebound Youth Justice Services. Whilst there has been some refurbishment and minor extension to these facilities there is no identified requirement for major new developments within the Medway area.

Youth Services

4.116 There are approximately 65,500 children and young people aged 0-19-years in Medway, and while this number is expected to reduce marginally during the life of this plan the number of children aged 0-4 will grow by around 5 per cent. Medway's population has a greater proportion of children and young people than the national and regional average. Medway's Youth Service organises activities and courses and provides information, guidance and support for 11 to 25-year-olds. Helping young people to enjoy life and get ahead, the service offers access to sports, leisure and creative art activities.

4.117 Medway has a number of youth centres that provide a wide range of services:

Hempstead Youth Centre;
Lordswood Youth Centre;
Parkwood Youth Centre, Rainham;
Strood Youth Centre;
Woodies Youth Centre, Rochester;
Woodlands Youth Centre, Gillingham.

4.118 A network of Sure Start centres also provides support and facilities to younger families.

Policy CS9: Health and Social Infrastructure

The development of sustainable places in Medway with healthy communities and social infrastructure where residents enjoy a high quality of life will be assisted by:

- **Relevant organisations and communities being supported to promote, protect and improve the health of Medway's population and reduce health inequalities between different population groups and areas**
- **Protecting and enhancing existing facilities, services and amenities that contribute to the quality of life of residents and visitors**
- **The reduction of air pollution and ground and water contamination and the control of noise**
- **Working closely with the Medway Maritime Hospital Trust to bring about the continued redevelopment of the hospital in Windmill Road and to make the hospital a centre of excellence**
- **Preserving and improving access to facilities and services wherever possible. Support will be given to the redevelopment and improvement of primary care facilities through active participation in the Local Improvement Finance Trust (LIFT) Co process**

- **Ensuring effective regeneration and the timely provision of additional, health and social facilities. The identified strategies for the provision of relevant health and social infrastructure, in locations that are appropriate and accessible, will be used to ensure that new development integrates satisfactorily with, and meets the needs of, all communities.**

The Council will continue to implement its Neighbourhood Action Plans at All Saints, Brook Lines, Strood South, Twydall and White Road Estate, and develop two more at Luton and Gillingham North.

Sport and Recreation

- 4.119 Details of the typology, quantity and quality of Medway's outdoor sports facilities can be found in the Medway Wildlife Countryside and Open Space strategy 2008-2016. This is supplemented by a 'PPG17' audit completed in 2011. Sport and leisure is an important means of tackling local issues of poor health, community development and deprivation.
- 4.120 Between 2009 and 2016 the Sports Development Strategy has a Vision for sports development in Medway; which is for it to be a place:
- Where all young people get a good start in sport and recreation
 - Where people of all ages have high quality, enjoyable opportunities to stay involved in sport and recreation throughout their lives
 - In which all sports participants have opportunities to improve and achieve their own personal sports goals
 - Where people are encouraged to adopt a healthy lifestyle through active living and enable the socially disadvantaged to feel socially included
 - In which the Medway Sporting Academy gives every primary school child in Medway the opportunity to fulfil his or her full sporting potential.
- 4.121 Medway Park is the area's new flagship multi-sport facility and has been approved as an Olympic pre-games training camp. The creation of Medway's regional centre of sporting excellence is an £11million project, developed in partnership with the Thames Gateway, Sport England and University of Kent at Medway. If sports provision is considered as a pyramid, Medway Park is at the pinnacle. Below this are what might be termed 'district' sport and leisure centres. Currently these comprise Strood, Lordswood and Stirling leisure centres, supplemented by the Splashes leisure pool. Schools, private and voluntary clubs make up the next tier of provision.
- 4.122 Gillingham Football Club is Kent's only football league club. It supports a range of local sports and community development programmes and boosts visitor numbers to the area – over 100,000 per annum. The current ground at Priestfield has been improved but its future potential is limited. The club has ambitions to relocate to a new purpose built stadium and the Council has been working with it to try to achieve this. However, no site or funding has currently been identified in order for this to take place.

Nevertheless the Council will continue to work closely with the club to identify opportunities.

- 4.123 In terms of outdoor sports pitches, Sport England advice and National Playing Fields Association standards indicate a substantial shortfall in provision. However detailed analysis of existing supply and demand indicates that provision is broadly in balance for cricket, rugby, bowls and hockey, with a limited problem with senior football and a greater need for junior football and tennis. The latter is being addressed by Tennis Together - the creation of a 6 court indoor purpose built tennis centre at Beechings Cross. This difference is attributed to lower participation rates in Medway than the national average.
- 4.124 As part of its leisure, culture, sport and tourism strategy, the Council intends to actively realise the opportunities presented by the award of the Olympic Games to London in 2012 and the easy access to Stratford afforded by Channel Tunnel Rail Link Domestic Services. In the period leading up to the Games themselves a range of strategies have been put in place to increase participation rates in sport and to improve the standard and distribution of facilities. This in turn should provide the basis for a long term and positive local legacy from the Games.

Policy CS10: Sport and Recreation

In order to improve the quality of life of existing and future residents of Medway and promote healthier lifestyles the Council will:

- **Safeguard existing facilities for sport and leisure and seek to extend and supplement these with new facilities where appropriate to meet a broad range of needs**
- **Continue to work with Gillingham Football Club in identifying opportunities for a new stadium and developing its community role within the local area**
- **Continue to implement strategies to maximise the local benefits of the London Olympics in 2012. These include the development of enhanced training facilities, increased participation in sport, provision of a major pre-Games training camp and meeting hotel and other accommodation needs for visitors to the games. All strategies will aim to secure a strong, positive and long lasting legacy from the Games.**

Culture and Leisure

- 4.125 Medway has a strong cultural and heritage offer including the state of the art sports facilities developed at Medway Park, a potential World Heritage site and recognition of the local arts and music scene through the Culture and Design Awards. Potential exists to strengthen this further and

increase visitor numbers as well as local engagement as recognised in the Cultural Strategy.

- 4.126 The Council's Cultural Strategy 2009-2014 will help the Council to promote, encourage and provide opportunities for culture and leisure for all, quality of life and community wellbeing, meeting the needs of young people, community cohesion, contributing to the local economy and providing a clean and green environment. Halls, libraries and clubs fulfil a key role in meeting the needs of local communities.
- 4.127 Within Medway there is a large built and natural heritage offer, encompassing castles, parks and open spaces, museums and archives. These places and spaces provide the setting for a wide range of cultural activity. It is important to care for and develop these assets for current and future generations. Key proposals for this include:
- Developing sustainable cultural uses for Eastgate House and Temple Manor
 - Conservation of and improved visitor facilities for Rochester Castle and Upnor Castle
 - Improvements to Gillingham Park
 - Refurbishment of play areas under the Playbuilder Programme
 - Making open spaces more welcoming, safer, cleaner and greener
 - Delivering the Great Lines Heritage Park
 - Supporting the bid for World Heritage Site Status
 - Ongoing development of the Medway museum offer at the Historic Dockyard and the Guildhall and Royal Engineers Museums.
- 4.128 Medway's Economic Development Strategy emphasises the importance of cultural and creative industries, in contributing to the growth of Medway's tourism and economic prosperity. Arts and Culture are important contributors to Medway's wider economic growth and its growth as a tourist destination. In particular, Chatham's two theatres, free festivals, historic buildings, the Guildhall museum, the increased visitor numbers to Chatham's Historic Dockyard and Dickens World all represent a significant contribution to Medway's economy.
- 4.129 Medway's cultural strategy outlines a number of further aspirations to work with partners to promote and develop the cultural offer.

Policy CS11: Culture and Leisure

In order to realise the significant cultural and leisure potential of the area, to improve the quality of life of existing and future residents, promote healthier lifestyles and a participative and inclusive community the Council will support the implementation of Medway's Cultural Strategy which encompasses a range of cultural provision, including the development of new cultural venues centred on Chatham and extending along the Medway waterfront.

Heritage Assets

- 4.130 Medway's historic environment is an irreplaceable asset. It is an expression of our history, heritage and culture and lies at the heart of local and regional character and sense of place. It helps to maintain varied and attractive places in which to live and work, provides historic places to visit and enjoy and encourages investment in, and re-use of, old buildings. It has the potential to act as a significant draw for inward investment and heritage led regeneration.
- 4.131 The importance of the historic environment in contributing to sustainable development in terms of its potential to support regeneration, tourism and social inclusion as well as conservation can be seen by the revitalisation of The Historic Dockyard, Chatham.
- 4.132 Medway is particularly fortunate in that it has a number of the region's most significant historic environment assets including:
- The historic City of Rochester
 - The potential World Heritage Site of Chatham Dockyard and its Defences
 - Significant defence heritage including– Upnor and Rochester Castles, Fort Amherst and the Chatham Lines, and the Great, Lower and Inner Lines.
- 4.133 Most of these heritage assets are protected to some degree by statute - for instance designation as conservation areas, scheduled ancient monuments or listed buildings. However, the historic environment is much more extensive than this. It includes reference archaeology, historic landscapes and historic development patterns. Important heritage assets include:
- Historic street patterns and forms of development in many parts of Medway, particularly within the major town centres (and not just in conservation areas). An example of this is the long and winding Chatham and Rochester High Streets, which stretch from Rochester Bridge to Luton arches.
 - A unique river and hillside topography. Historically the escarpments and the tops of hills were often left undeveloped for Military purposes. This, together with key landmark buildings of national and international importance such as Rochester and Upnor castles, Fort Amherst, the Dockyard and the Cathedral, has left a legacy of unique views. There are also a number of local landmark buildings within each view. Development over a wide area (and not just within conservation areas) could impact upon this historic environment. Strategic views, together with a management strategy for controlling development that impinges upon these views is laid out in the Building Height Policy for Medway. In addition, the setting of the proposed World Heritage Site is defined by its 'buffer zone' (as laid out in the World Heritage Site Management Plan)
 - Unlisted buildings, which contribute to the character of their localities.
 - Areas of rich archaeological importance dating from the Palaeolithic, Mesolithic and Neolithic periods to the 20th Century.

- 4.134 It is recognised that the historic environment will be subject to change and that it is not possible, or at times desirable, to maintain all aspects. Through the use of conservation area appraisals and management plans (where appropriate), development briefs, the Chatham Dockyard and its Defences World Heritage Site Management Plan, and the Kent Historic Environment Record, the Council will adopt a managed approach to this change based on an understanding of the character and significance of the historic environment.
- 4.135 In applying policy CS12 it is recognised that sensitive modern design which takes into account historic street patterns, scale, plot width, townscape and so on can enhance the historic environment. Conversely 'Historic Style' facadism applied without a thorough understanding of the historic environment may be inappropriate.

Policy CS12: Heritage Assets

Medway's historic environment and heritage assets will be preserved and enhanced by:

- **Supporting the conservation and, where appropriate, the enhancement of the historic environment and the contribution it makes to local and regional distinctiveness and sense of place**
- **Assessing new development within historic areas, within the setting of historic areas and landscapes (including the 'buffer zone' of the identified World Heritage Site) or prominent in key views, in terms of its contribution to the preservation and enhancement of the special qualities of these areas, views and landscapes and, in the case of the World Heritage Site, against its impact on the Site's Outstanding Universal Value**
- **Encouraging proposals that make sensitive use of historic assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use**
- **Requiring design statements which accompany new development proposals to demonstrate an understanding of how the historic environment within which the development will sit, has informed the development of the design**
- **Where appropriate, removing permitted development rights from 'local list' buildings in order to control change**
- **Supporting World Heritage Site status for the Chatham Dockyard and its Defences; supporting the development of the Great Lines Heritage Park and seeking to establish new integrated management arrangements covering enhancement, maintenance and access for Fort Amherst**

and the Chatham Lines (subject to military security, safety and other issues being resolved).

Figure 4-4 Great Lines Heritage Park

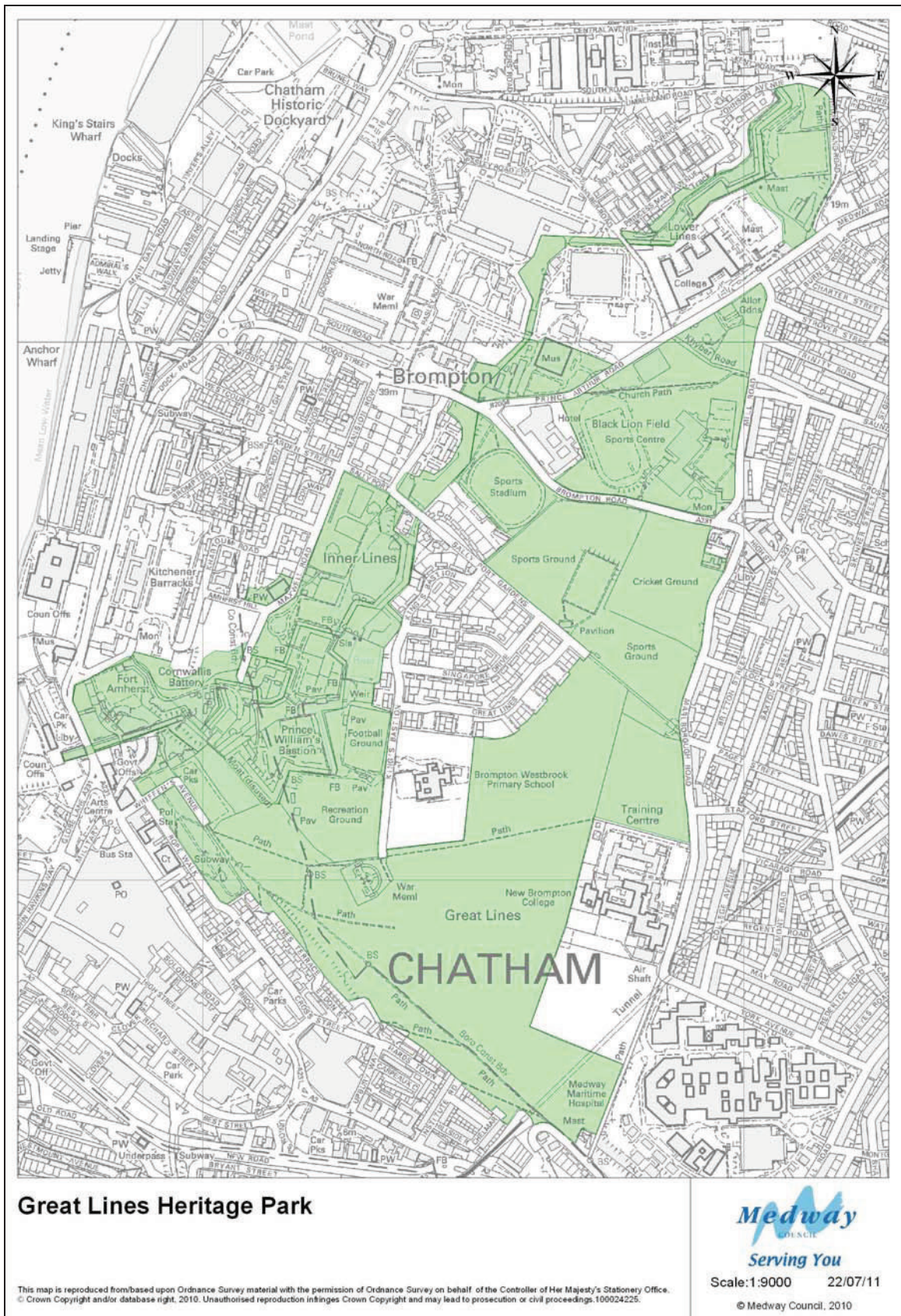
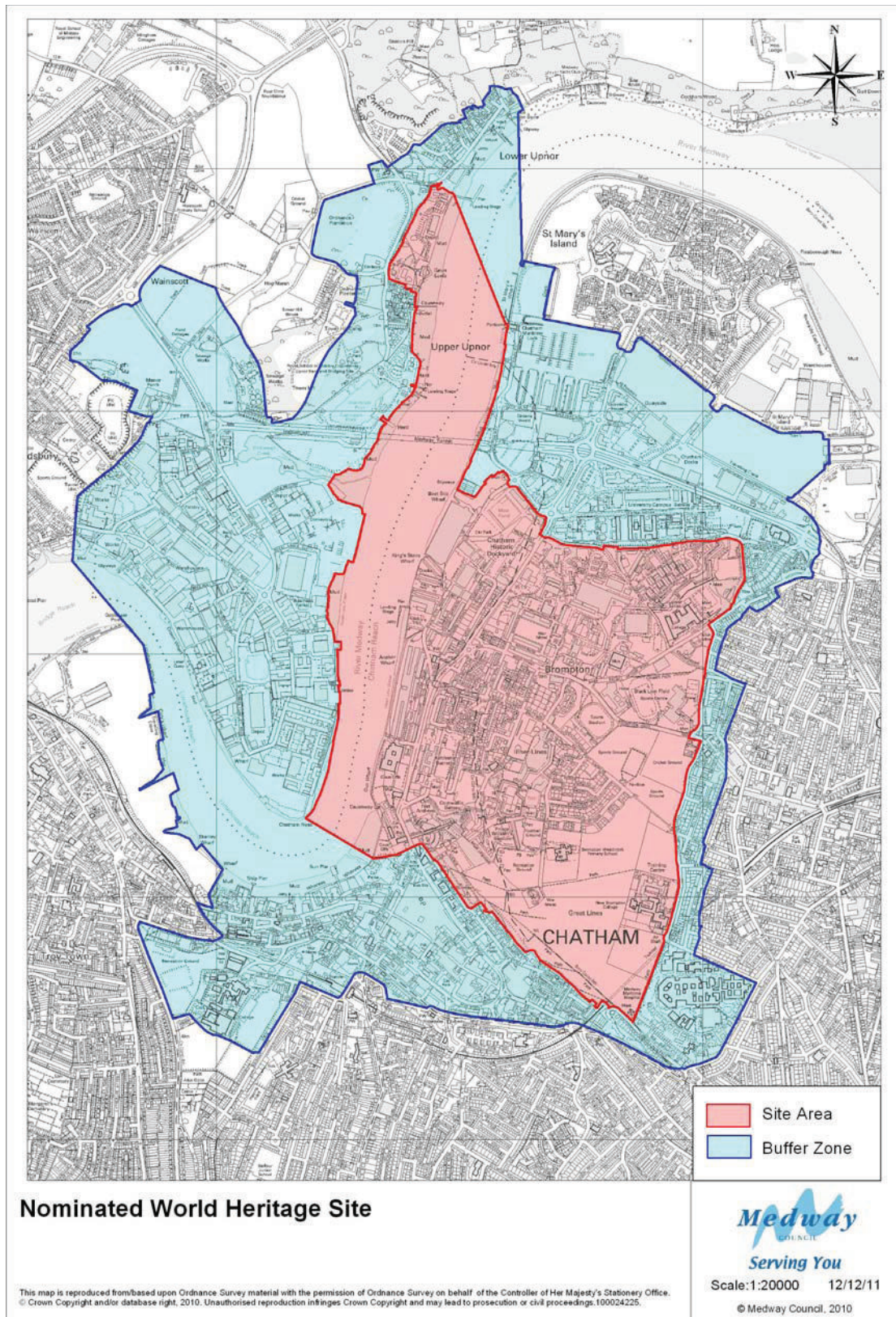


Figure 4-5 Nominated World Heritage Site



5. Housing

Introduction

- 5.1 The majority of Medway is located within the Thames Gateway, which covers the area of the borough north of the M2. The remainder, located to the south of the M2, is deemed to be part of the 'rest of Kent' for planning purposes. There has been longstanding recognition of the need to regenerate Medway and exploit its abundant brownfield land supply, particularly with regard to its numerous waterfront sites, as well as on the Ministry of Defence land at Lodge Hill where a new settlement is proposed. Therefore priority is given in the Strategy to new development taking place on previously developed land. Housing provision is also an important tool to help rejuvenate town centres and their evening economies, especially when it forms part of comprehensive mixed-use developments. This is a particular issue in respect of Chatham, which has so far failed to develop a town centre and evening economy worthy of a sub-regionally important centre and which has a small residential population.
- 5.2 Delivery of sufficient housing of the right types and in the right locations in order to ensure the creation of sufficiently mixed and balanced communities is crucial to the sustainable development of Medway. On the other hand, there is also a need to balance the pressure to redevelop employment land for housing with the need to ensure sustainable economic growth and nurture local businesses.

Housing Provision and Distribution

- 5.3 As explained in Chapter 3 the Council intends to proceed with an overall housing target of an average of 815 dwellings per year over the period to 2028. This equates to a total for the whole plan period of 17,930. This applies to Medway as a whole and represents a balance between the needs of the current population and the aspirations for the Thames Gateway as a growth area.
- 5.4 The great majority of this will occur in the main part of the Borough that is located in the Thames Gateway. Only around 624 units in total are expected to be built in the 'rest of' area, which essentially corresponds to the parishes of Cuxton and Halling (Medway Valley). Here the former Cemex cement plant at Halling is to be redeveloped and this will account for most of this number.
- 5.5 The Core Strategy therefore proposes the delivery of at least 815 dwellings per annum (785 within the Thames Gateway) on average over the plan period up to 2028. Despite adverse economic conditions nationally, recent dwelling completion rates in Medway have been historically high. 761 dwellings were delivered in 2007-2008, 914 in 2008-2009 and 972 in 2009-2010. The delivery rate fell to 657 dwellings for 2010-11 but this still exceeded the forecast. It is therefore considered to be a healthy delivery rate, given the challenges facing the housebuilding sector nationally.

- 5.6 The key components of housing supply will be the large waterfront regeneration sites within the main urban area and the new settlement at Lodge Hill. It is expected to deliver approximately 5,000 dwellings in total (4,275 within the plan period).

Housing Delivery

- 5.7 Medway's established housing delivery strategy will continue with its heavy emphasis upon the regeneration of previously developed land in accordance with the Thames Gateway agenda. Consequently, unnecessary greenfield developments will not be allowed that would jeopardise this overall strategy. The Council has little control over the private market in terms of the timing of actual delivery, particularly given the current uncertainty with regard to the economic recovery. However, it will continue to encourage pre-application discussions and actively engage with Registered Providers and other key stakeholders in order to maintain delivery.
- 5.8 The housing trajectory for Medway anticipates that the peak of housing delivery will come forward between 2015 and 2021. It also suggests that delivery is expected to tail off over the last few years of the plan period. This is based on the availability of sites and the market may, in practice, even-out this trajectory.
- 5.9 A plan, monitor and manage approach to residential land supply will be taken in order to ensure that the positive regeneration agenda is not undermined by potentially harmful environmental effects. The Council has prepared a Housing Trajectory, which identifies the rolling five-year land supply and how the required housing growth will be accommodated over the life of the plan. This shows a more than adequate 15-year housing supply and continuing capacity for development beyond this. A summary of the supply position is shown in the table below.

Table 5-1 Medway Housing Supply Components

Supply Component	Number of dwellings (Thames Gateway)	Number of dwellings (Rest of Kent)	Total
Units completed 2006-2011	3,854	41	3,895
Small Sites with planning permission at April 1, 2011	271	14	285
Large Sites with planning permission at April 1, 2011	6,357	569	6,926
Allocations	396	0	396
Projected Strategic Land Availability Sites (not including large sites and allocations detailed above)	9,441	0	9,441
Total Supply	20,319	624	20,943

Source: 2010/11 Annual Monitoring results and Strategic Land Availability Assessment 2010/11

- 5.10 This shows a housing supply from identified sites for Medway of 20,943 dwellings (19,439 up to 2028). This includes housing completions already achieved of 3,895 dwellings. Importantly it makes no allowance for future 'windfall' developments. That is, sites not currently identified but which may also come forward in future years. Medway has had a significant contribution from such sites in the past but no allowance is being made for the future as this cannot be quantified. A very healthy supply position is therefore indicated for the period up to 2028. This will contribute to the resilience of the strategy and increase market choice.
- 5.11 The following table and map shows where the majority of new housing is planned to come forward (see also Chapter 10 for further details).

Table 5-2 Distribution of New Housing by Sub Areas from 2011/12 to 2028+

Sub-areas	Number of Units
1. Chatham	4,437
2. Rochester	2,940
3. Gillingham	1,363
4. Strood	2,106
5. Rainham	112
6. Medway Valley	569
7. Hoo Peninsula	5,236
Total	16,763

- 5.12 In relation to the proposed allocation at Lodge Hill, the Core Strategy and the Strategic Land Availability Assessment only assumes that approximately 4,275 of the total provision of 5,000 dwellings will be delivered within the plan period. However, the SLAA still demonstrates a healthy surplus with regard to the overall housing supply requirement.
- 5.13 A number of Adopted Local Plan Allocations are being carried over as listed below. All are suitable development sites and the Council has had positive and recent discussions about a number of them.

Table 5-3 Local Plan Allocations

SLAA Ref	Local Plan Ref	Site Name
0013	GL181	Medway House, 277 Gillingham Road
0090	ME254 & ME375	Strood Riverside, Canal Road
0100	ME386	320 - 344 High Street inc. 42 New Road, Rochester
0102	ME407	1-35 High Street, Chatham (Grays Garage)
0516	ME342	Mercury Close, and adj to 62-72 Shorts Way Borstal
0525	ME409	Former Laundry Hilda Road Chatham

0598	ME410	R/O 329 - 337 (Featherstones) High St Rochester
0757	ME383	Between Cross Street & The Brook, Chatham
0844	GL150	Amherst Hill, Brompton

Policy CS13: Housing Provision and Distribution

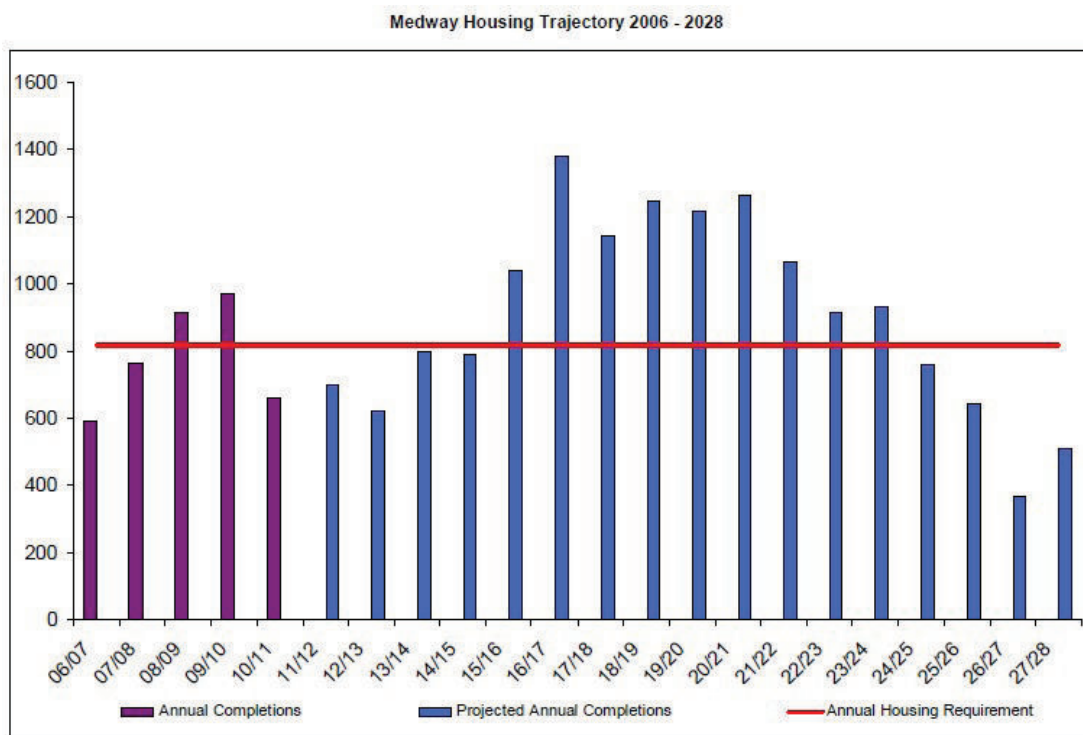
In accordance with Table 5-1 and the schedule set out in Appendix C, provision will be made to ensure at least 17,930 new homes can be delivered between 2006 and 2028, (an average of 815 per year), of which at least 17,500 will be within the Thames Gateway Area.

This will include:

- All sites which are the subject of adopted development briefs or masterplans, including Strood, Chatham and Gillingham town centres
- Sites allocated in the Medway Local Plan 2003 not already having the benefit of a planning permission
- A contribution of 5,000 dwellings (of which approximately 4,275 dwellings will be delivered during the plan period) arising from the Strategic Allocation of land at Lodge Hill (see Policy CS33)
- Sites with planning permission; and
- Other sites amongst those identified in the Medway Strategic Land Availability Assessment.

Further sites will be allocated in the forthcoming Land Allocations and Development Management Development Plan Document, depending on the outstanding requirement at the time it is prepared.

Figure 5-1 Medway Housing Trajectory 2006 - 2028



Affordable Housing

- 5.14 A significant proportion of the population is unable to afford the cost of purchasing, outright, a house or other type of residential accommodation. As such it is critically important to maintain an adequate supply of what is termed 'affordable housing' to ensure that the whole population has a satisfactory place to live. Affordable housing can take a number of forms, including 'social rented', 'affordable rented' and various types of 'intermediate' accommodation and is usually provided through a Registered Provider (RP) or Housing Association approved by Medway Council. Government funding is allocated by the Homes and Communities Agency to RP's but not all sites receive a subsidy and larger private housing developments are asked to make a contribution. In recent years this has been at a rate of 25% on sites of over 25 units in urban Medway and 15 units in rural Medway. PPS3 'Housing' requires Local Planning Authorities to set a target for the number of affordable homes, which they will seek to provide during the plan period.
- 5.15 In order to quantify the need for affordable housing over the period of this plan the Council jointly commissioned a North Kent Strategic Housing Market Assessment (SHMA) in association with Gravesham Borough Council. The North Kent SHMA (2010) found that:
- 70% of future requirements for social rented housing* is for smaller homes (1 and 2 bedrooms); and
 - 65% of future requirements for other tenures is for larger (3+bedroom) homes.
- 5.16 An analysis of house prices in Medway, in a parallel Viability Study, indicates that the area can be divided into seven market value areas: High Value Medway, Medway Rural, Southern Settlements, Chatham West and Rochester, Strood, Gillingham North and West and Chatham South and East.
- 5.17 Assuming a development scenario of schemes being developed at 40 dwellings per hectare, residual values at a 25% affordable housing rate vary from £3.35 million per hectare in High Value Medway, to £0.56 million per hectare in Chatham South and East. The calculations were based upon the assumption of nil grant from the Homes and Communities Agency and assume that the intermediate affordable element of the affordable housing was New Build Home Buy.
- 5.18 The Viability Study suggests three main options for setting affordable housing proportions for planning policy purposes. These are:
- Maintain the current policy target of 25% as set out in the Council's current planning framework. This would provide continuity.
 - Introduce a split target, which seeks a higher level of affordable housing in the high value locations of the local authority area. A broad

* The same assumption should be made for affordable rented need as this is essentially the same client group

indicative split would work between the urban areas including Chatham, Gillingham, Strood and Rochester where 25% affordable housing, supported by grant in the weaker locations would be appropriate; and, on the other hand, the more rural areas of Medway Rural and Southerly Settlements, where a 30% affordable housing target would be viable.

- A 35% target for High Value Medway.

- 5.19 The Study concluded that whilst a 25% target would be a continuation of existing policy, it would rely on grant funding being available in the weaker sub markets. Therefore, a split target, recognising the inherent variation across the area, might be a more appropriate solution.
- 5.20 Having regard to the study's findings it is intended that the current affordable housing policy target of 25% will be maintained within the existing urban area boundaries and at Hoo St. Werburgh, but elsewhere a 30% policy target will apply. These targets will apply to all sites of over 15 units or 0.5 hectares. In all cases the viability of developing a site will be taken into account, including the cost of any other development contributions being sought.
- 5.21 Developers will need to demonstrate and justify, via appropriate evidence, why they are seeking to deviate from specific developer contribution requirements. The Council will require an 'open book' approach. The developer/landowner will be expected to provide all relevant financial and other information behind the appraisal to enable the Council and/or independent valuer on the Council's behalf to assess the nature, extent and impact of the constraints upon the viability of the scheme. It is recommended that this information is submitted as part of any pre-application discussions.
- 5.22 If the Council seeks independent advice regarding such a submission, the developer will be required to pay the Council's costs for this advice. This is standard practice and in line with the advice contained within the Home & Communities Agency's Good Practice Note: Investment and Planning Obligations – Responding to the Downturn (August 2009).
- 5.23 If, following such an appraisal and based upon all available evidence, the Council concludes that the scheme is economically viable, and if the affordable housing requirement is not met, this could result in the application being refused planning permission.
- 5.24 Individual site viability may be affected by the availability (or not) of grant funding. Where viability issues arise, consideration will be given to alternative means of ensuring affordable housing delivery in line with the Council's 'cascade' mechanism. Further guidance in relation to affordable housing provision is set out in the Medway Guide to Developer Contributions. This document will be regularly updated.
- 5.25 The term 'affordable housing' is defined as in PPS3 'Housing' 2011 and this definition applies to Policy CS14 below.
- 5.26 The definition does not exclude homes provided by private sector bodies or provided without grant funding. Steps need to be taken to ensure that, through the drafting of any agreement, homes meet the definition and can be

considered, for planning purposes, as affordable housing. Those homes that do not meet the definition, for example, 'low cost market' housing, may not be considered as affordable housing.

- 5.27 Affordable housing should be provided on-site and secured through a S106 agreement (or equivalent device introduced by Government) as part of the proposed development unless the Council and the applicant both consider that it is preferable for provision to be made on an alternative site or for a financial contribution to be made. The Council's preference is for affordable housing to be provided and managed by a Registered Provider (RP). In order to achieve inclusive and sustainable communities, the provision of on-site affordable housing should be integrated seamlessly into the layout of the whole development.
- 5.28 In negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision. Where viability is an issue, financial support will be sought via public subsidy, such as through the Homes and Communities Agency (HCA). At appropriate rural settlements, sites that would not normally be released for housing will be considered for schemes that specifically meet an identified local need for affordable homes. This is known as an 'Exceptions Policy' and is advocated in PPS3. Such schemes must ensure that the properties are made available in perpetuity for this purpose.

Policy CS14: Affordable Housing

In order to address affordable housing need over the plan period:

- **25% affordable housing provision will be sought on all sites within the existing defined boundary of the main urban area and Hoo St. Werburgh**
- **30% affordable housing provision will be sought on all sites elsewhere within Medway**
- **Provision should be made on all new housing developments capable of accommodating 15 or more dwellings, or on sites of 0.5 ha or more in size, irrespective of the number of dwellings.**

The provision of affordable housing to meet local needs on a qualifying site will be subject to:

- **Its suitability for on-site provision**
- **Site viability**
- **The extent to which the provision of affordable housing would prejudice other planning objectives to be met from the development of the site; and**
- **The mix of units necessary to meet local needs and achieve a successful, sustainable and socially inclusive development.**

On sites of 15 or more (gross) dwellings, on-site provision should be made, which seeks to incorporate a range of different dwelling types and sizes which reflect the site's characteristics, the development as a whole and the types of need identified in the most up-to-date Strategic Housing Market Assessment and Housing Needs Study. Any over-

concentration of any one type of dwelling will be resisted if it would adversely affect community cohesion.

Small- scale affordable housing schemes may be acceptable on an exceptional basis on sites outside of, but adjoining the settlement boundaries of the rural villages.

Housing Design and Other Housing Requirements

5.29 The planning system has traditionally been most concerned with the provision of new housing for occupation by self-contained households. However:

- Despite Medway being located in the Thames Gateway the amount of new housing proposed will still be dwarfed by the existing housing stock
- Significant elements of the population do not live in self-contained accommodation including those in various types of institutions, students and those occupying hostel style accommodation and houses in multiple occupation
- Although higher sustainability standards are being applied to new housing, a consequence is that the existing stock will account for an increasing proportion of our carbon footprint if no action is taken.

5.30 Accordingly the sections below consider these and related issues.

Existing Housing Stock

5.31 A significant proportion of Medway's housing stock dates from before 1919 and is not readily adaptable to modern standards in terms of thermal insulation and fuel efficiency. This presents difficulties in bringing the older stock up to modern standards and adds significantly to the incidence of fuel poverty. Improving the existing stock, most of which is privately owned, is therefore a challenge but also important.

5.32 The Council will seek to develop and promote retrofitting programmes at a neighbourhood level to address this issue but the programming and scale of this will be heavily dependent on the resources available. Programmes are already in place to upgrade the publicly owned stock.

Housing Type and Tenure

5.33 Three specific characteristics mark Medway out from other major settlements in the South East: a very small proportion of what might be called 'executive style' accommodation; a smaller than average private rented sector; and a much smaller proportion of flats and apartments in favour of terraced properties than the norm elsewhere.

5.34 Accordingly very high quality housing schemes will be encouraged in appropriate locations. An expanded and higher quality private rented market will also be encouraged. In other areas there has been a very strong move away from providing flats and apartments, where this was seen as contributing to the collapse in the housing market in 2008-09. However in Medway there is much less justification for this and the various waterfront

regeneration sites provide exceptional opportunities to develop schemes of the highest quality.

5.35 It is also important that new development:

- Provides adequate standards of accommodation to enable occupants to undertake their day-to-day living activities safely, comfortably and efficiently
- Meets future needs by being flexible and generous enough to meet changing demands and lifestyles; and
- Combines efficiency in land use with the environmental benefits of well-designed, well-managed housing, particularly when built to higher densities.

5.36 For these reasons the Council has produced Housing Design Standards alongside this Core Strategy.

Special Care Accommodation

5.37 For many vulnerable older people, having the chance to avoid residential care and live in specially designed housing as tenants or owner-occupiers is the single most important element in retaining independence and dignity in old age. Increasingly, the Extra Care housing model is gaining support as a realistic and viable alternative to 'institutional' care models. Extra Care housing is a flexible concept, but fundamentally refers to "purpose built accommodation in which varying amounts of care and support can be offered and where some services are shared"⁹.

5.38 The Core Strategy addresses this need through the retention of existing viable care homes; by seeking to bring forward new extra care facilities and increasing the stock of suitable new housing that complies with the Lifetime Homes standard and therefore helps a range of residents including older people to live active and independent lives for longer.

Institutional and Student Housing

5.39 Given the rapid expansion of the Universities at Medway and the associated rise in student numbers to 10,000 and further increases envisaged over the next few years, it is important to avoid situations where established residential neighbourhoods are adversely affected by an over concentration of students and existing privately rented accommodation is not 'lost' to tenants with otherwise limited housing options.

5.40 These issues have recently been recognised in a revision to the Use Classes Order, which makes private units in multiple occupation a class in its own right and so requiring express planning consent.

5.41 Equally the Council is committed to positively supporting the expansion of further and higher education and so it will work with the universities and Mid Kent College to help deliver bespoke student accommodation where

⁹ Housing Learning and Improvement Partnership 2006, Extra Care Housing Toolkit)

necessary. To this end, a student accommodation registration scheme will be set up. A recent study¹⁰ analyses student housing requirements in Medway. It looks at the relationship between students and the wider housing market. The report recognises that current economic circumstances make it difficult to predict future student housing requirements with much certainty. Consequently, the council will need to regularly liaise with the universities in order to ensure that student accommodation needs can be properly met.

- 5.42 However, should further planning controls ever be needed in the future, due to the growth of student houses in the area eventually resulting in the creation of imbalanced communities, the Council will make an 'Article 4 Direction' that restricts home owners 'Permitted Development' rights to use their property as houses in multiple occupation (HMOs) within Class C4 of the Use Classes Order.

Health and Education Implications for Housing

- 5.43 Housing developments that encourage and deliver healthy living should be the norm. This can be done by a variety of means including linking new housing to improved sports provision, playing pitches, allotments and children's play spaces, as well as making places more accessible, attractive and safe to use for walking and cycling. One way of achieving this is through the use of Health Impact Assessments (HIA's) and these will be sought in relation to housing proposals of 50 or more dwellings.
- 5.44 Developers will also need to take into account the impact new housing development will have on the need for early years, primary and secondary education provision including provision for special educational needs.

Policy CS15: Housing Design and Other Housing Requirements

Sustainable residential communities will be created by requiring the provision of a mix and balance of good quality housing of different types and tenures and having regard to the North Kent Strategic Housing Market Assessment. This will be achieved by ensuring that:

- **Housing developments help to balance the size, type and tenure and affordability of the local housing stock**
- **All housing developments are well designed and are capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard**
- **Housing complies with space and other standards laid down in the Medway Housing Design Standards**
- **Proposals for developments of 50 or more dwellings are accompanied by a Health Impact Assessment**
- **Support is given to the provision of housing for vulnerable people and specialist housing, including fully wheelchair adapted homes, units for clients with learning disabilities, extra care accommodation and sheltered housing facilities, in**

¹⁰ Understanding the housing needs of students in Medway, ORS – June 2010

- appropriate locations and where there is an identified need
- 'Executive' style housing will be supported as part of housing schemes offering a range of housing types and in other suitable locations
- Land is utilised effectively and higher densities are achieved in locations well served by public transport or which can be made accessible to public transport
- Derelict or brownfield sites in areas affected by historic contamination being addressed in a comprehensive way to ensure the environment is remediated prior to development commencing and then protected from any further contamination
- Student accommodation proposals demonstrate how they will meet a proven need for the development and are compatible with wider social and economic regeneration objectives and are conveniently located for access to the universities and local facilities. Where necessary, Article 4 Directions will be imposed, in order to restrict home owners' 'Permitted Development' rights to use their property as houses in multiple occupation (HMOs) within Class C4 of the Use Classes Order
- Subject to available resources, programmes to improve and renovate the existing housing stock will be advanced to maintain its fitness for purpose and improve sustainability standards.

Gypsies, Travellers and Travelling Showpeople

- 5.45 Government policy requires local development frameworks to make specific provision for the housing needs of gypsies, travellers and travelling showpeople. In Medway there is a long established Council run gypsy and traveller site at Cuxton and a winter quarters site owned by the Showmen's Guild of Great Britain at Station Road in Strood. Elsewhere in Medway some gypsy and traveller families have settled on small private sites or integrated into the general housing market.
- 5.46 A North Kent Gypsy and Traveller Accommodation Assessment (GTAA) undertaken in 2006 identified a requirement for 10 new 'pitches' in Medway over the following 5 years. A 'pitch' in this context is taken to be a plot of land capable of accommodating two caravans. The GTAA found that in Medway 80% of new pitches should be provided on private sites in line with demand.
- 5.47 Given current uncertainties over the direction of national policy in this area the following policy provides an objective basis for the determination of planning applications. This will be revised as necessary if, as expected, further changes in national policy are introduced, subsequent to the 'Planning for Traveller Sites Consultation (April 2011)'.
- 5.48 PPS25 classifies caravans and mobile homes intended for permanent residential use as 'highly vulnerable' and therefore will not be permissible in flood Zone 3 areas. Temporary and seasonal sites are acceptable in flood risk areas but must be subject to the Sequential and Exception tests. All gypsy and traveller sites in flood risk areas will need to have an appropriate flood warning and evacuation plan approved by the Council.

Policy CS16: Gypsies, Travellers and Travelling Showpeople

To meet the identified need for Gypsy, Traveller and Travelling Showpeople pitches within Medway, sufficient sites will be allocated within the Land Allocations and Development Management Development Plan Document. In allocating sites and for the purpose of considering planning applications, the following criteria will need to be satisfied:

- The site is located outside of Flood Zones 2 and 3, or if not, adequate flood defences are, or will be, put in place
- Safe and convenient vehicular and pedestrian access to the site can be provided
- There is easy and safe access to the strategic road network and the site does not generate traffic of an amount or type inappropriate for the roads in the area
- The site is able to accommodate on site facilities for the parking and manoeuvring of vehicles (including exiting in forward gear) and storage, play and residential amenity space
- The site is located within a reasonable distance by foot and/or public transport of local facilities and services, including schools and health facilities; and
- The site is environmentally acceptable, compatible with neighbouring land uses and of limited impact on the local landscape as assessed in the context of the Medway Landscape Character Assessment.

Existing authorised Gypsy, Traveller sites in Medway and the Travelling Showpeople site in Strood will be safeguarded, unless they are no longer required to meet an identified need, or improved replacement facilities are being provided.

6. Economic Development

Introduction

- 6.1 Nurturing and developing the Medway economy goes hand in hand with the physical regeneration of the area and is essential to improve the prospects of local people in an ever more competitive world and keep pace with housing growth.
- 6.2 Traditionally the Medway economy was dominated by the naval dockyard and associated industries but in recent years it has diversified. However it is still characterised by very low local pay rates and significant levels of out commuting to London and the greater Maidstone area.
- 6.3 The challenges for the future are therefore to increase the value of local jobs, to reduce, to a degree, the current reliance on net out commuting and to grow local enterprises – currently the area has a very high proportion of small and micro businesses.

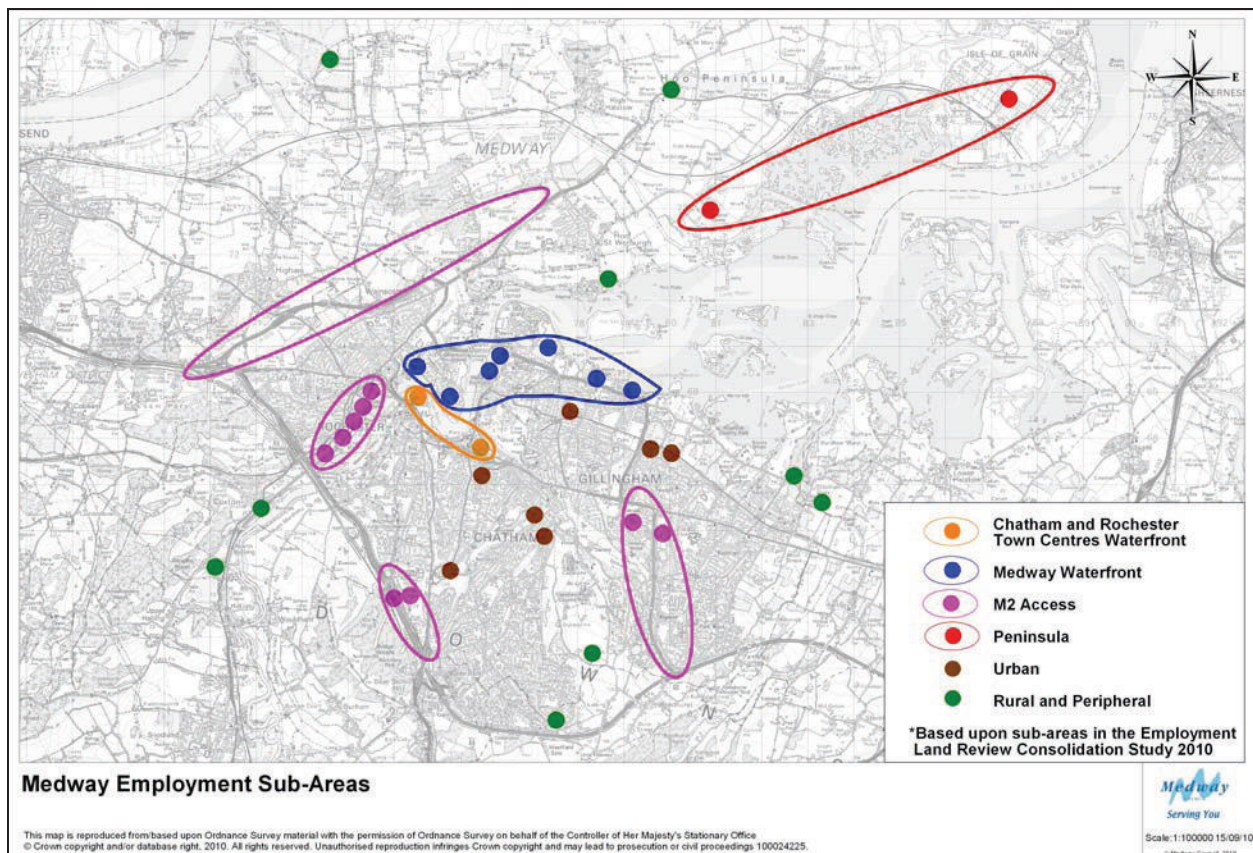
Economic Development

- 6.4 The current economic downturn has made future prospects uncertain, not just in Medway but across the country. The immediate strategy must therefore be about creating the right conditions for future growth and taking advantage of the specific local opportunities on offer.
- 6.5 The latter include:
- BAe Systems at Rochester Airfield. This is by some way the area's largest private sector employer and the company is a global leader in its field. The company itself has identified opportunities for spin-off activities and land is available to develop complementary operations. This could create an economic 'cluster' of considerable significance. Future commercial development should be concentrated on advanced manufacturing and software engineering to foster growth in these sectors
 - The Universities at Medway Campus, Chatham Maritime, as it develops, has obvious opportunities for spin-off activities and value added research. The range of institutions on the site provides an unparalleled opportunity to develop a cluster of at least Thames Gateway, if not national, significance
 - The proposed site for the new settlement at Lodge Hill is highly attractive and the opportunity is available to take advantage of the proposals for a sustainable settlement form. The location is also suitable to accommodate smaller scale, higher and further education functions, for example, satellite operations from the Universities at Medway, Chatham Maritime and higher value activities associated with the developments at Kingsnorth and Grain
 - Isle of Grain: A very large site with a potential focus on low carbon and associated technologies, plus value added port activities

- The large employment area at Kingsnorth is now well connected to the main road network and offers a range of opportunities including logistics and distribution, off-site manufacture for the construction sector, environmental technologies and waste management and processing
 - Central Chatham associated with its development as a centre of regional significance and with a specific focus on fostering development within the creative industries and office sectors.
- 6.6 In 2009, the Council adopted the latest Medway Economic Development Strategy. This contained five strategic priorities, which form the basis for the economic strategy set out here. Those priorities are:
- Sector development
 - Skills development
 - Higher education
 - Employment space; and
 - Image building.
- 6.7 It considered that the most significant opportunities are with the creative industries and tourism but the specific development opportunities described above also point to a range of other opportunities, particularly around construction, environmental technologies, power and energy generation and advanced manufacturing.
- 6.8 Skills development and Medway's expanded further and higher education capacity go hand in hand and the Council and its partners will continue to work very closely with the four universities and Mid Kent College to both improve skills capacity and match it more closely to the needs of employers.
- 6.9 Modern start-up businesses help to create jobs and contribute to Gross Value Added (GVA). The development of more effective and innovative firms, complementing more traditional industries, is an important contributor to productivity growth and a competitive economy. In order to assist these businesses, a range of support measures is essential to ensure sustainable growth.
- 6.10 An effective start-up strategy will be one that seeks to address imbalances by providing services tailored to meet specific needs. Medway is at the forefront of best practice in this field and has been recognised nationally by its Beacon Council award for business support. The Council's "Medway Means Business" programme enables interaction with the business community, aspirant entrepreneurs and new and growing businesses.
- 6.11 Tangible business support initiatives further strengthen the support on offer. Medway offers managed workspace facilities, graduate and apprenticeship work support programmes, financial support services such as start up grants and interest free loans, employment support services and European funded business support projects to facilitate cross-channel trade and business environmental sustainability. Medway is also developing its own entrepreneurial culture, building enterprise into the school curriculum and developing links between schools and the Universities at Medway.

- 6.12 Medway is also well placed to provide the full range of support services and facilities required by established businesses due to the city scale infrastructure and services available. The range of projects highlighted below is intended to unlock this potential and make Medway a destination of choice for businesses.
- 6.13 The Council and its partners will promote:
- Active business support networks
 - Sector specific working groups
 - Apprenticeship and graduate placement schemes
 - Employ Medway (the Council's employment support service)
 - The development of incubator and grow-on spaces for new and expanding businesses
 - The continuing development of innovation sector facilities in conjunction with the Rochester Airfield technology cluster
 - A new creative industries cluster in Chatham in conjunction with the University for the Creative Arts and other partners.
- 6.14 In 2008 there were 94,500 people employed in Medway. As explained in Chapter 3 the Council has developed a range of four alternative job targets or scenarios based on a population projection of 280,000 by 2028. These are:
- Low employment rate and low reduction in out commuting = 8,200
 - Low employment rate and high reduction in out commuting = 12,500
 - High employment rate and low reduction in out commuting = 15,900
 - High employment rate and high reduction in out commuting = 20,300
- 6.15 A number of factors point towards the lower end of the range unless a step change occurs in employment and out commuting patterns. To put this in context, between 1991 and 2001, the number of Medway residents out commuting increased whilst the economic activity rate remained steady and even dropped between 2006 and 2008. However, given the Council's aim of reducing out commuting and growing the local economy, the Core Strategy is making provision to meet a high growth target.
- 6.16 In 2010, the Council commissioned consultants, Baker Associates, to prepare an Employment Land Review Consolidation Study, which identified the amount of land and floorspace required to provide for 21,500 jobs up to 2026. This study was commissioned before the Core Strategy plan period was extended to 2028 and the jobs target is now lower. Given that the Study has yet to be reviewed, the floorspace provision is therefore slightly higher than is required for this lower jobs figure, but sufficient land is already committed to meet this requirement.
- 6.17 The study divided Medway into a number of sub-areas, which reflected the distribution of existing employment areas and the areas where market demand surveys indicated the market would want to locate in the future.

Figure 6-1 Medway Employment Sub Areas



6.18 The overall requirement amounted to 392,610 sq m. on 54.44 hectares of land in the following locations.

Table 6-1 Floorspace Requirements by Sub Areas

Location	Floorspace	Land
	Sq m	Ha
Town Centre/Waterfront	150,352	11.37
M2 Access	183,747	32.25
Peninsula	31,121	4.29
Other Urban Areas	27,389	6.53
Total Requirement	392,610	54.44

6.19 The study drew upon the Medway Employment Land Supply Study of 2006, a number of adopted development briefs and, in the case of two sites, the Medway Strategic Land Availability Assessment (SLAA) 2010, to identify a potential supply of employment land to meet the requirements. Using SLAA floorspace figures for sites where only a hectareage figure is given in the employment land study the current overall supply position in each sub area is indicated.

Table 6-2 Employment Floorspace Supply by Sub Areas

Location	Floorspace Required	Floorspace Supply	Surplus/Deficit
	Sq m	Sq m	Sq m
Town Centre/Waterfront	150,352	76,376	-73,876
M2 Access	183,747	49,505	-134,242
Peninsula	31,121	666,290	+635,169
Other Urban Areas	27, 389	4,827	-22,562
Total	392,610	796,998	+404,388

- 6.20 Details of the anticipated rate of development of B1, B2 and B8 uses are set out in the Employment Land Trajectory in Appendix D.
- 6.21 The study did not identify a requirement for floorspace/sites in the rural area but a further 9,453 sq m of potential floorspace has been identified in the SLAA on sites in the rural area.
- 6.22 These results show that, overall, there is a very healthy supply situation but that there are some mismatches in the sub areas. This is not surprising as the area has not been split down in this way before and the analysis at this level takes no specific account of constraints to land releases.
- 6.23 Taking account of the Economic Strategy, the Employment Land Study and the SLAA, it is intended that priority will be given to the development of sites in the town centres and the redevelopment of existing urban employment areas at higher densities. This will include sites within Strood, at Lodge Hill and adjacent to Rochester Airport, which enjoy good access to the M2 and have the ability to attract growth businesses offering significantly higher-skilled and higher value local employment opportunities. The Employment Land Study emphasises that development on new sites with access to the M2 would undermine reinvestment in more central locations.
- 6.24 Although both Kingsnorth and the Isle of Grain have been allocated for employment development for many years, the latter has not previously been counted towards meeting development plan requirements. However both sites have now been granted planning permission for B1, B2 and B8 uses and new markets are emerging for the development of environmental technologies and other activities. Although these industries may result in development at lower densities than traditional B2 and B8 uses, the scale of the sites is such that a substantial contribution can be made to employment growth and consequently they are included in the employment land supply contributing to the Core Strategy. It is anticipated that the employment generated there will more than offset notional supply deficits elsewhere in Medway.
- 6.25 Retail development is a significant employment generator but the consolidation study does not identify either retail floorspace demand or supply. Instead it defers to the Medway Retail Needs Study carried out by Nathaniel Lichfield and Partners in 2009. The details of this study are set out

in policy CS19. This study identified spare capacity for 111,635 sq m of retail floorspace in Medway up to 2026 based on a high growth option. The Annual Monitoring results and the Strategic Land Availability Assessment (SLAA) 2010/11 Update has identified a potential supply of 124,510 sq m up to 2028.

- 6.26 Not only is there sufficient floorspace overall to meet the employment requirements but there are also a range of locations and types of site to cater for all likely growth sectors over the plan period. A substantial surplus of floorspace in B1, B2 and B8 uses and A1 to A5 uses will provide flexibility to meet all anticipated requirements over the plan period and respond to changing economic conditions.
- 6.27 The final strategic objective from the Economic Strategy is concerned with image building. That is, boosting the overall image of Medway, not only as a business location but also a thriving place in which to live and play. Specific actions to achieve this are set out in Policy CS17.

Policy CS17: Economic Development

The development of the Medway economy will be dynamic and widely based, to provide employment for the community as a whole, to provide greater choice for the workforce, offer an alternative to out-commuting and achieve a balance with housing growth.

Provision will be made for the expansion of the existing economic functions of the area, including the growth of Chatham as a sub-regional employment, retail and service hub and the development of the large Isle of Grain employment site and the Kingsnorth Commercial Park, and associated energy and port related areas.

The development of the following specific sectors, will also be encouraged:

- **Energy and environmental technologies**
- **Engineering and manufacturing**
- **Building products and construction (including off-site manufacture)**
- **Health and social care**
- **Creative industries; and**
- **Tourism.**

There will be new office, manufacturing and service development on a variety of scales, with an emphasis on higher value activity to develop increased GVA and higher skilled employment opportunities. This will include the development of incubator and grow-on space for new and expanding businesses.

The Council and its partners will assist in the development of the work readiness and skills required by existing and potential employers through improved standards of education and skills in the workforce. This will include support for initiatives to expand higher and further education and improve its links with local employers.

Major efforts will be made to improve Medway's image by:

- **Developing Chatham as a centre of regional significance**
- **Development of a diverse and vibrant evening economy**
- **Encouraging the development of comprehensive leisure facilities**
- **Promoting Medway as a venue for top sporting and cultural activities**
- **Continuing to support the bid for World Heritage status**
- **Stimulating a more creative use of the River Medway in conjunction with the development of riverside sites**
- **Improvement to Medway's 'gateways' such as its railway stations**
- **Continuing to promote and develop Medway as a City**
- **Developing Medway as a genuine and connected "city break" tourism destination.**

A supply of around 935,998 sq m of employment floorspace and premises has been identified to provide a range and choice of sites in terms of quality, accessibility, type and size, to meet Medway's requirements up to 2028.

The Council particularly recognises the potential that the new settlement at Lodge Hill presents for creating a high quality environment for the development of employment and the continuing opportunities at, and in close proximity to, Rochester Airfield to develop a technology and knowledge based cluster.

The Council will protect established employment areas from other development and support higher density development where appropriate, and promote reinvestment strategies for each.

The Council will also support the agricultural, horticultural and forestry industries, and rural economic diversification and non-land based business proposals in towns and villages or on farm sites where applications show positive benefits.

Tourism

- 6.28 In 2009, tourism employed over 6,100 people and was worth about £286 million annually to the local economy. Continued growth is projected in the national and international tourism economy and Medway has the potential for further growth.
- 6.29 Tourism helps to raise levels of civic pride, improves the perception of an area, delivers local and sustainable jobs and provides economic incentive for new cultural and leisure facilities. It provides a boost to other sectors of the local economy such as retail, arts and culture, leisure, heritage and transport.
- 6.30 Medway Council is a major stakeholder in the tourism economy. It operates one of the largest and most prestigious Visitor Information Centres in the

South East, Kent's second most visited local authority museum, two castles, five major annual festivals, an award winning coach park, three country parks and several historic green spaces.

- 6.31 The Historic Dockyard now ranks as one of Kent's premier league visitor attractions. The new No.1 Smithery gallery and museum, displaying national collections, should make the Dockyard one of the top attractions in the South East.
- 6.32 Dickens World, which opened in 2007, has secured Chatham Maritime's status as Medway's second major visitor attraction cluster and has complemented the existing Dickensian aspect of Rochester's tourist appeal.
- 6.33 The prospect of World Heritage Site status for Chatham Dockyard and its defences by 2014 will greatly enhance Medway's reputation as a visitor destination of international status.
- 6.34 The 2012 Olympics present Medway with various opportunities and will be a further catalyst to develop Medway as a genuine city break destination.
- 6.35 Rochester Castle and Cathedral are iconic landmarks and significant tourist destinations. Plans to conserve the two monuments will help Rochester to continue to develop as one of the UK's most significant historic destinations.

Policy CS18: Tourism

Medway Council will positively promote sustainable tourism development. A diverse and high quality tourism offer will be encouraged that seeks to lengthen the tourism season, increase the number and length of visits, provide job opportunities and sustain the tourism economy, whilst maintaining and where possible, enhancing Medway's natural and built environment qualities.

In order to successfully develop Medway's tourism 'product', the Council will seek to secure:

- The provision of more internationally branded hotels to allow a shift from the lower spend day trip market towards new markets such as business tourism and city breaks
- Public realm investment in the historic core of Rochester
- The development of the evening economy and cultural offer which are required for all successful city break destinations
- A waterfront theatre and cultural hub which would help to link the tourist offer in Rochester with the Dockyard and Chatham Maritime and assist with the overall destination profile of Medway
- An improvement of the image and 'brand' of Medway to enhance its awareness as a visitor destination beyond the South East
- Development of the leisure use of the river Medway; and
- An increase in skills and quality of the local tourism industry.

Local tourism will be supported by:

- Encouraging tourism and provision for visitors which is appropriate to the character of the area
- Retaining and enhancing existing serviced accommodation and supporting the provision of new serviced accommodation in towns and villages
- Encouraging proposals for new hotel accommodation and conference/exhibition facilities in locations which complement regeneration opportunities, particularly along the urban waterfront
- Maintaining and enhancing existing tourist and visitor facilities
- Supporting new tourist initiatives:
 - In towns and villages and
 - In the countryside through the re-use of existing buildings or as part of farm diversification schemes.

Retail and Town Centres

- 6.36 The Government's key objective for town centres, as set out in PPS4; Planning for Sustainable Economic Growth, is to promote their vitality and viability. It seeks to do this by focusing new economic growth and development in them, and enhancing consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres whilst conserving and enhancing their historic, archaeological and architectural heritage.
- 6.37 The current hierarchy of town centres in Medway is being retained. It consists of:
- Regional Hub and primary centre: Chatham
 - District Centres: Strood, Gillingham, Rainham, Hempstead Valley Shopping Centre, Rochester
 - Villages and Neighbourhood Centres (as identified in Chapter 10)
- 6.38 In addition there are retail Parks at Gillingham Business Park, Horsted Retail Park and Strood Retail Park, free standing food superstores at Courtney Road, Gillingham, Maidstone Road, Chatham and Princes Avenue, Chatham and a factory outlet centre at Chatham Maritime. A further food superstore is being developed at Whitewall Creek.
- 6.39 In 2009, Nathaniel Lichfield and Partners prepared a town centre, retail and leisure study, which included an assessment of all the main centres. The study assessed the future need for additional retail, commercial leisure facilities and other town centre uses, taking full account of the current economic climate.

6.40 Shopping or retail potential is considered in two categories:

- 'Convenience' – goods bought on a day-to-day basis, mainly food
- 'Comparison' – or 'durable' goods. These include clothing, footwear, electricals etc.

6.41 The Study found some potential for new convenience floorspace, as detailed in the following tables.

Table 6-3 Convenience Floorspace Capacities 2008 - 2026

Sales floorspace (sq m net)	2008	2011	2016	2021	2026
Large food stores	2,960	3,760	5,607	6,642	7,298
Small food stores/shops	1,776	2,256	3,364	3,385	4,379
Total	4,736	6,016	8,971	10,027	11,677

Table 6-4 Convenience Floorspace Options 2008 - 2026

Time Period	Large foodstore floorspace	Small store/shop floorspace
2008 – 2011	3,280 – 3,760 sq m	1,968 – 2,256 sq m
2011 – 2016	969 – 1,847 sq m	581 – 1,108 sq m
2008 - 2026	6,439 – 7,298 sq m	3,863 – 4,379 sq m

6.42 To put this in context a large food superstore is usually around 6,000 sq m.

6.43 It concluded that there was no obvious area of deficiency in Medway, that some capacity could be accommodated within existing vacant premises or small redevelopments within the main centres but outside of the main centres the priority should be to serve major new residential developments.

6.44 On the other hand, in relation to comparison spending, the Study identifies scope for a large increase in floorspace as detailed below.

Table 6-5 Comparison Floorspace Options 2008 - 2026

Medway Catchment Sales floorspace (Sq m Net)	2008	2011	2016	2021	2026
Scenario 1: Increased market share – baseline population	N/A	-4,560	34,940	63,103	94,854
Scenario 2: Constant market share – High population growth	N/A	-3,238	23,750	49,702	76,775
Scenario 3: Increased market share – high population growth	N/A	-3,238	41,363	69,981	99,958

6.45 Apart from forecast changes in population this is largely due to the fact that a high proportion of spending on comparison goods currently 'leaks' out of Medway to other shopping centres – indicating that the local town centres, particularly Chatham, are performing well below their potential.

- 6.46 It is therefore intended that the strategy for Medway will be to enhance Chatham's current position in the shopping hierarchy and improve the area's market share of available expenditure.
- 6.47 The retail study points out that the shopping centres within Medway are all located close to each other, particularly Strood, Rochester and Chatham and that their primary catchment areas therefore overlap. The main centres collectively provide what is described as a reasonably good range of comparison shops (393 units with sales floorspace of 86,396 sq m net), including a range of national multiples and independent specialists. However, the choice of shopping could be improved. Existing provision largely caters for the middle and lower end of the market, and has a poor offer for the upper end.
- 6.48 It concludes that Medway is well provided for in terms of retail warehouse facilities. Retail parks provide about 42,000 sq m (net) of comparison floorspace. This accounts for about 28% of all comparison sales floorspace.
- 6.49 The Study provides a sound basis for the future retail strategy and how this should be applied in each centre.
- 6.50 Chatham is, and will, remain the main comparison shopping destination and the main focus for employment, leisure, entertainment and cultural activities. As the main centre, it needs to compete with other large regional/sub-regional centres such as Maidstone, Bromley and Canterbury. To achieve this it needs to be the focus for major retail developments, large-scale leisure and other uses that attract large numbers of people, including major cultural, tourism and community facilities. At least 30,000 sq m of additional floorspace should be brought forward to radically change the perception of the centre and its range of shops and attract larger retailers.
- 6.51 The District Centres will complement Chatham by providing convenience food shopping and a range of comparison shopping facilities and other services catering for their immediate catchments. Opportunities to develop additional small scale shop premises will be encouraged, and the priority will be for additional convenience shopping facilities and lower order comparison shopping. Higher order comparison shopping will be focused in Chatham.
- 6.52 Neighbourhood and Village Centres will be maintained to ensure they provide basic food and grocery shopping facilities, supported by a limited choice and range of comparison shops selling lower order comparison goods (bought on a regular basis) and a range of non-retail services and community uses. Together with local parades they will continue to serve smaller catchment areas focused on their respective local communities.
- 6.53 The Medway Local Plan 2003 sought to protect and enhance a very large number of sometimes very small local and neighbourhood centres. However since it was adopted many have struggled commercially or even disappeared completely. The intention therefore is to now afford protection to those centres that are of sufficient scale and are in locations that readily serve significant residential communities. These are identified in Chapter 10.
- 6.54 The floorspace figures shown in policy CS19 reflect the findings of the Medway Retail Needs Study, 2009 and the Medway Strategic Land

Availability Assessment First Review, May 2011. The figures are indicative only and should not be treated as the maximum floorspace, which will be permitted.

Policy CS19: Retail and Town Centres

Medway Council will maintain and enhance the vitality and viability of its network of urban and rural centres and support the delivery of appropriate comparison and convenience retail, office, leisure, community, entertainment and cultural facilities. Town centres and edge of centre sites will be the preferred location for such development and a sequential test will be applied for development elsewhere in accordance with PPS4.

Chatham, the sub-regional hub, will be the preferred location for major retail development and other uses attracting a large number of people.

Provision will be made for the following retail development:

- **50,000 sq m gross comparison retail floorspace in Chatham, primarily in the Best Street/High Street area, the Pentagon, the Brook and the Waterfront redevelopment area**
- **Smaller scale comparison goods shopping units at the district centres with a cumulative total floorspace of:**
 - **Strood, (9,400sq m)**
 - **Rochester (Riverside) 7,800sq m**
 - **Gillingham (6,200 sq m)**
 - **Lodge Hill (1,500 sq m)**
 - **Hempstead Valley (2,800 sq m)**
- **Two convenience stores of about 3,500 sq m at Corporation Street, Rochester and 3,500 sq m at Lodge Hill, Chattenden.**

The Council will promote its centres and will seek improvements in the range and choice of shops and services, the intensification of retail floorspace use and the reoccupation of vacant retail floorspace.

Education and Personal Development

- 6.55 The Council's overall aim is to enable everyone to realise his or her full potential, regardless of race, gender, disability, sexual orientation, age and religion, and make the best possible contribution to society. The Council is seeking to do this by focusing on the needs of the learner, raising aspirations, promoting the highest standards of teaching and learning and sharing good practice.
- 6.56 Schools have the primary responsibility for raising achievement. The Council recognises the need to strengthen their autonomy and their capacity for self-evaluation. The Local Education Authority's role (LEA) is to provide

leadership and to give schools appropriate challenge and support in order to meet Medway's overall targets.

- 6.57 Medway Council's School Organisation Plan (SOP) for 2007/08 – 2011/12 sets out the policies and principles on which school organisation will be based and how Medway plans to meet its statutory responsibility to provide enough places to promote higher standards of attainment. For example, in response to changing pupil numbers, it proposes amalgamating some infant and junior schools to create all-through primary schools for children aged 4 -11. It also recognises the role of the community in the concept of extended schools which can include childcare and health provision as well as out of school hours and community education opportunities.
- 6.58 According to the 2001 Census, only 12% of residents' aged 16-74 had qualifications at degree level or higher, and this ranked Medway 66th out of 67 authorities in the South East. Therefore increasing the educational achievement of Medway residents and encouraging local people to go to university in Medway rather than elsewhere have been key priorities for the Council and the Local Strategic Partnership. This is now yielding excellent results with attainment levels rising at a greater rate than other areas. Indeed by 2009 just over 20% of working-age residents in Medway had qualifications at degree level or higher.
- 6.59 The University for the Creative Arts has an ambition to develop a new campus to replace that at Fort Pitt and the Council will positively support this. It will also work with the other three universities to further develop the capacity and range of provision on the Chatham Maritime campus and, if necessary in satellite locations.
- 6.60 Mid Kent College has a longstanding association with construction and allied trades and, as part of the Holdfast Consortium, now provides training to the Royal School of Military Engineering at Brompton and Wainscott. With a new campus at Prince Arthur Road the college is exceptionally well placed to promote itself as a regional construction skills hub.
- 6.61 The Council is also determined that the broad education offer available in Medway is aligned as closely as possible to the needs of existing and future employers and a number of actions are ongoing to achieve this.

Policy CS20: Education and Personal Development

The Council will work with all relevant partners to develop a fully integrated educational offer including:

- **All-through primary provision with integrated or associated early years provision**
- **Re-investment in secondary education, including the development of Academies**
- **Management arrangements for schools which fully exploit their potential as community hubs**
- **A distributed adult learning service with a new focus on re-skilling and meeting the identified needs of local employers**
- **The further development of the University for the Creative Arts,**

offering a wide range of foundation and graduate opportunities whilst fully exploiting opportunities for direct spin-off and other creative industry opportunities

- Re-investment in and the further development of Mid Kent College, both as a broad focus for post 16 education and as a regional scale hub for construction and allied skills
- The further development of the Universities at Medway campus at Chatham Maritime as a distinct focus for degree and post degree higher education provision within Thames Gateway
- The establishment of a cross sector high level education forum intended to steer future development and strengthen links with the business sector.

7. Energy, Waste and Minerals

Introduction

- 7.1 As an all purpose unitary council Medway is also a minerals and waste planning authority and, in discharging this role, needs to ensure that effective policies are in place to meet both local and regional requirements. These are set out in this chapter.
- 7.2 Medway is also nationally significant in terms of power generation, electricity distribution and liquefied natural gas storage.

Conventional Energy Generation

- 7.3 Medway generates around 15% of the country's electricity. This was originally founded on coal and oil, with large plants at Kingsnorth and Grain respectively. More recently two gas powered plants were added at Damhead Creek and adjacent to Thamesport. A large combined cycle gas turbine technology station has come on stream at Grain and this will eventually replace the oil fired plant there. Plans for the tripling of output from the Damhead Creek gas powered plant have been approved but a plan to replace the Kingsnorth coal plant with a modern alternative is awaiting a decision by Government. If this proceeds it is likely to be coupled with full Carbon Capture and Storage (CCS) technology.
- 7.4 North Sea natural gas supplies have been depleting whilst UK demand has been increasing. Gas powered energy generation currently stands at 38% of national energy production. To meet the gap Grain has been at the forefront in providing new importation and storage capacity and it now provides one of the largest storage installations in the world.
- 7.5 A two-way electrical inter-connector (BritNed) now links Grain and the Netherlands and aviation fuel is also imported, stored and distributed from Grain.
- 7.6 Although renewable technologies will play a much greater part in energy production in the future, all the indications are that fossil fuel sources will continue to be needed, if a serious energy gap is to be avoided. Medway's strategic contribution to national requirements will therefore continue for the foreseeable future.
- 7.7 Despite this enormous investment in strategically vital infrastructure however, the benefits to the local area and economy have been limited. The operational workforce for each facility is quite small and the construction workforce is drawn from around the world rather than from within Medway.
- 7.8 Despite this there are certain opportunities for the future, which will be vigorously pursued:
- The creation of a maintenance and support services cluster to the local energy sector, building on Medway's traditional manufacturing and support industries strengths

- Long term research and development opportunities if new plants are required to install full scale CCS
- The potential for large-scale district heating utilising waste heat from new power plants. Initial feasibility studies in relation to Kingsnorth indicated a scale of opportunity so far unique in the UK (100,000 homes equivalent)
- Local matching of skills development to the needs of the sector.

Policy CS21: Conventional Energy Generation

Proposals for additional power generation and energy storage capacity on the Hoo Peninsula and the Isle of Grain will be supported, subject to:

- **Their impact on the natural environment, particularly European sites (see Policy CS6) and local settlements being acceptable**
- **Specific efforts being applied to the recruitment and use of local labour, including collaboration with local universities and colleges**
- **The feasibility and viability of proposals being assessed for their potential to re-use waste heat.**

The Council will positively promote the development of local supply chains and a support and maintenance cluster. It will also seek to develop further value added and Research and Development activities in conjunction with the plant operators.

Provision for Minerals

- 7.9 Medway Council is the Mineral Planning Authority (MPA) for the area. It is charged with the responsibility of ensuring a steady supply of minerals to both meet local needs and contribute proportionally to regional requirements.
- 7.10 Details of the available local reserves, past production rates and other information are set out in the Minerals State of Medway Report.
- 7.11 The materials covered by this section are:
- Secondary aggregates – effectively the reuse of materials such as demolition waste in place of virgin aggregates
 - Land won sands and gravels (aggregates)
 - Chalk
 - Clay
 - The importation of aggregates – both marine dredged and land won from outside the region.
- 7.12 Where relevant the Medway apportionments in terms of supply, capacity and safeguarding from the appropriate regional working parties are applied.
- 7.13 The government's overall objectives for minerals supply and safeguarding are:

- A reduction in overall need through increased efficiency of use
- Use of recycled and secondary aggregates to supplant primary sources as far as technically practical; and
- Securing the remainder of the supply need from new primary extraction (terrestrial and marine).

7.14 It also applies the following hierarchy in terms of meeting need:

1. Increased use of alternatives to primary aggregates are to be encouraged where technically practicable
2. Use of imported marine resources, where environmentally sustainable sources are present; and
3. Source land won resources, maintaining at least a seven year landbank of permissions based on the sub-regional apportionments from the evidence base of the South East Plan
4. Make provision at existing cement manufacturing facilities for at least 15 years of production, and 25 years at new sites.

7.15 There is no specific guidance for high purity chalk for whiting purposes or for clay, although both occur in Medway. However it is prudent that resources of high quality engineering clay and chalk should be maintained. Medway has no brick or clay tile industry but has abundant London Clay resources that can be used for certain purposes such as coastal flood defences.

7.16 The likely revocation of the South East Plan will mean that Medway no longer has to make provision to meet a sub-regional apportionment for secondary aggregates of 0.2 million tonnes per annum (mtpa). However it is national policy to seek to substitute primary aggregates with secondary sources and significant amounts of this material are derived from the construction and demolition waste stream. Accordingly it is considered that Medway should make provision for the 0.2 million tonnes per annum previously envisaged.

7.17 Both land won minerals (crushed rock and sand and gravel) and marine dredged materials (sand and gravel) are imported into the South East. Wharves and railheads are essential to this source of supply and it is of growing importance to overall aggregate supply. Some 13.1 million tonnes of sands and gravels and crushed rock were supplied to the region in 2007, while only 8.5 million tonnes came from land won reserves. Medway's regional contribution is in the order of 2 million tonnes so the safeguarding of facilities will be important to maintain this increasingly important source of supply.

7.18 Medway has the following facilities:

Marine Wharves:

- Euro Wharf, Frindsbury, Medway City Estate – Aggregates

Combined Rail Depot and Marine Wharves:

- Ex BP Terminal, Isle of Grain – Aggregates
- North Sea Terminal, Cliffe – Aggregates/Cement Products
- Halling Coal Rail Depot and Wharf, Halling – Coal/Cement Products

Planned but Non Operational Marine Wharves:

- Halling (adjacent to Halling Coal Rail Depot and Wharf) – Aggregates/ Waste Treatment to form Secondary Aggregates.

- 7.19 In terms of native land won aggregates the Government has indicated its support for regional apportionments envisaged in the South East Plan. In Medway's case that is 0.18 mtpa. This equates to 2.7 million tonnes for the period 2010-25 and a land bank of planning permissions at any one time of 1.26 million tonnes (equal to 7 years of production) throughout the life of the plan.
- 7.20 Medway has a long history of cement manufacture but this has now ceased. The Cemex UK owned Halling works has been demolished and significant permitted reserves of chalk in the Dean Valley at Cuxton have been abandoned. There is a significant new cement manufacturing site at Holborough in Tonbridge and Malling, owned by Lafarge UK that borders Medway. Preliminary site works have been implemented here but it is not known if or when the plant itself might be constructed. The associated chalk reserves (in Tonbridge and Malling) are in excess of 35 years.
- 7.21 Given this situation there is no need to identify any additional chalk resources for the cement industry at this stage.
- 7.22 High purity chalk for industrial whiting purposes is not specifically covered by national mineral planning policy but there is an important plant and associated reserves at Cliffe Quarry, owned and operated by Omya UK. The reserves are in excess of 6 million tonnes. Extraction rates are in the order of 20-30,000 tonnes per annum and there is an approved low-level restoration scheme. There is therefore no need to identify additional reserves of high purity chalk.
- 7.23 Medway does not have a clay brick or tile industry but does have abundant deposits of London Clay on the Hoo Peninsula. This material is suitable for engineering clay uses. Again there is no specific national mineral planning policy for engineering clay and it is an abundant material in the region but there is intermittent local demand, primarily for use on flood defences. The sole permitted reserves, at Rose Court Farm near Grain, are time limited to the end of 2011.
- 7.24 Clay is also an important material for lining and capping waste landfill/landraise sites and can also be used for contaminated land remediation. Accordingly it is appropriate to consider this in terms of possible requirements.
- 7.25 In terms of land won aggregates the permitted reserves in Medway are currently 1.2 million tonnes, representing a land bank of 6.6 years. These are at a site close to the east of Hoo St. Werburgh. Although it has planning permission, extraction has not commenced. The remaining reserves at Perry's Farm, Grain have been abandoned as uneconomic and the site is being restored back to agriculture.
- 7.26 Given this situation the overall requirement for the period 2010-2025 is:

- 2.7 million tonnes, minus current permitted reserves of 1.2 million tonnes, giving a residual requirement of 1.5 million tonnes; and
- A rolling land bank of 1.26 million tonnes throughout the life of the plan.

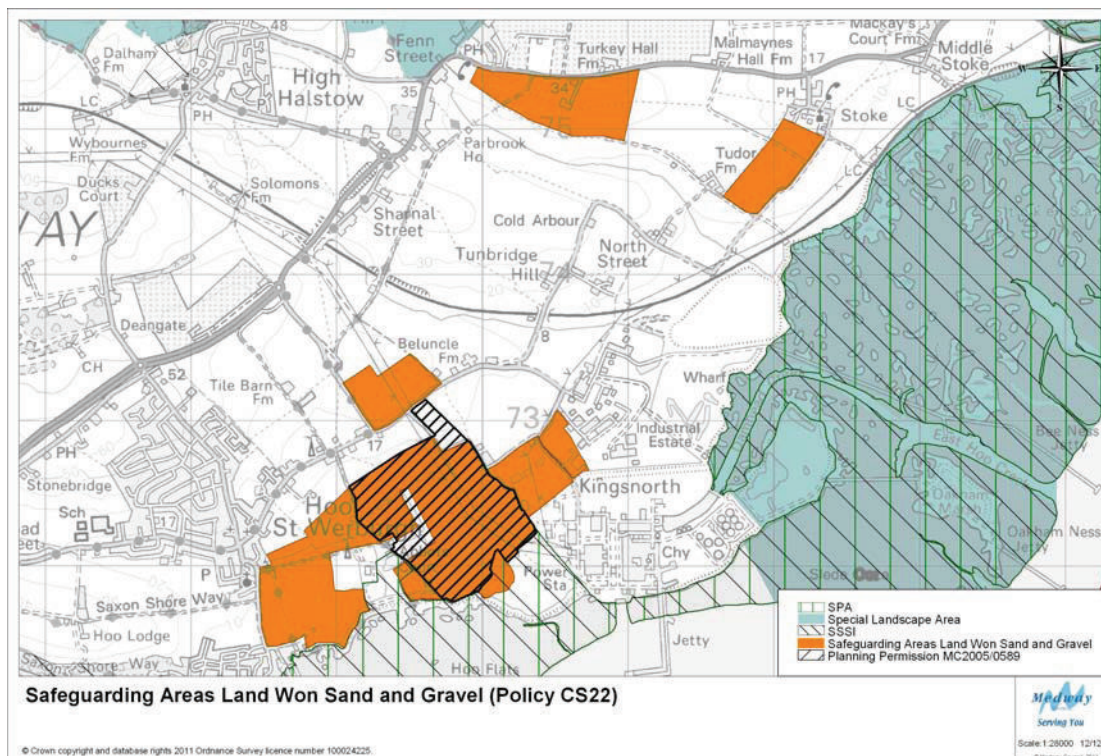
7.27 Resources available have varying degrees of reliability in terms of both quantity and economic viability. The potential reserves at Grain are now considered to be uneconomic. Against this, total proven reserves are 1,640,000 tonnes and total potential (proven and unproven) river terrace sand and gravel reserves in the unconstrained areas of the Hoo Peninsula are assessed as being in a range from 3,345,326 tonnes to 4,547,940 tonnes.

7.28 The available reserves are therefore more than sufficient to provide the 1.5 million tonnes proposed between 2010-2025.

7.29 The current land bank figure is equivalent to 6.6 years. With each successive year this is reduced by the assumed production of 0.18 mtpa. Assuming further reserves are permitted from the unconstrained identified potentially workable sand and gravel reserves on the peninsula these would ensure a 7 year land bank is maintained up to and beyond the end of the plan period. The lower reserve figure of 3.45 million tonnes would provide for a land bank until 2028 and the potentially higher figure of 4.54 million tonnes until 2035.

7.30 The identified mineral bearing areas shown on Figure 7.1 are to be safeguarded as they include reserves of potentially economic land won sands and gravels.

Figure 7-1 Land Won Sand and Gravels



- 7.31 Given the lack of cement production and the large reserve of high quality chalk at Cliffe there is no need to identify additional reserves of chalk over the plan period. It is possible that chalk supply could be sought for agricultural liming purposes or for engineering activity and so provision is proposed to meet this eventuality.

Policy CS22: Provision for Minerals

Provision of a continuous supply of 0.2 million tonnes per annum of Secondary Aggregates will be sought by:

- **Imposing conditions requiring the reclamation and reuse of construction and demolition wastes on redevelopment sites**
- **Allocating sites for the processing, sorting and distribution of secondary aggregate materials in the Land Allocations and Development Management Development Plan Document.**

The Council will make provision for the extraction of at least 0.18 million tonnes per annum of land won aggregates within the area identified to the east of Hoo St. Werburgh, together with at least a 7 year land bank of permitted sand and gravel reserves in the areas of search identified on the Hoo Peninsula over the plan period.

The Land Allocations and Development Management DPD will define the geographical extent of Areas of Search in more detail to identify environmentally acceptable new quarrying areas.

The basis for assessing proposals to meet an identified national, regional or local need for engineering grade clay or chalk will be set out in the Land Allocations and Development Management DPD.

All existing mineral railheads, wharves and associated storage, handling and processing facilities will be safeguarded against proposals that would prejudice their use for the continued importation of marine dredged sand and gravel, crushed rock and associated materials.

Waste Management

- 7.32 More background information on this complex topic can be found in the Waste State of Medway Report.
- 7.33 As a unitary authority Medway is responsible for the contractual arrangements for the collection, treatment and disposal of the municipal solid waste stream and for the sustainable spatial planning of the necessary capacity for this and all the other waste streams represented in the area. These are:
- Commercial and industrial waste
 - Construction, demolition and excavation wastes; and
 - Hazardous waste.

- 7.34 The emphasis is very much on sustainable waste management. That is reduction, reuse and recycling at source to meet national and regional guidance and targets, including an amended EU Waste Directive, now transposed into UK law, which strives for zero waste. This is reflected in a recently amended waste hierarchy issued by the Government.

Figure 7-2 The Waste Hierarchy



- 7.35 Wastes that cannot be recovered and residues from treated waste have to be safely disposed of to land (landfill) but this is increasingly a last resort solution and volumes being dealt with in this way are reducing rapidly.
- 7.36 Councils in the South East have been required to make provision for the disposal of a certain amount of London's waste to landfill. However there has been no recent demand for this in Medway and given the rapid trend towards zero waste it is not expected to apply in the future.
- 7.37 One of the guiding principles of national policy is that waste should be treated in reasonable proximity to where it arises. This is to encourage local responsibility and limit the environmental impact of transporting waste materials over long distances. Any final disposal should also be as close as possible to the place of origin of the waste.
- 7.38 An important consequence of the move towards zero waste is the need for a greater range of facilities to recover reusable materials and treat those capable of subsequent reuse, as opposed to landfill capacity. A wide range of methods and technologies are emerging, making it difficult to determine future requirements. However such facilities can include those for soil treatment, secondary aggregates, waste oil recovery and organic material processing such as composting.
- 7.39 The Council has just let a 25 year waste disposal contract for its municipal waste. After a competitive tender process, it will be taken out of the area for treatment and disposal. As a result there is no need to make provision for this form of waste over this plan period. However provision must still be made for the other waste streams.

Commercial and Industrial Wastes

- 7.40 The quantities of commercial and industrial wastes arising in Medway were calculated in 2009 as follows:

Table 7-1 Average tonnage per Sector per Annum

• Mining and Quarrying	Negligible
• Manufacturing	72,456
• Electricity, Gas and Water	8,765
• Distribution, Hotels and Catering	56,085
• Transport and Communications	3,841
• Financial and Business Services	12,422
• Government and Other Services	19,350
Total all sectors approx.	173,000

- 7.41 Environment Agency data in 2008 showed how this type of waste was dealt with, although this did not necessarily all occur in Medway or comprise exclusively Medway waste. This is shown in Table 7-2.

Table 7-2 Disposal of Commercial and Industrial Waste 2008

• 64,261 tonnes recycled	35.7%
• 2,290 tonnes incinerated	1.3%
• 349 tonnes reprocessed	0.2%
• 24 tonnes otherwise treated	0.01%
• 320 tonnes transferred	0.18%
• 92,090 tonnes unknown	51.2%
• 20,533 tonnes landfilled	11.4%
Total 179,867 Tonnes	

- 7.42 Currently Medway has the following facilities/capacity to deal with these commercial and industrial wastes:
- 0.67mtpa potential recycling capacity over a wide range of wastes but with significant application to the Commercial and Industrial Wastes stream, at Medway City Estate
 - In vessel waste composting at Kingsnorth: 125,000 tpa
 - Abattoir waste in vessel composting at Matts Hill: 40,000 tpa
- 7.43 Although the treatment or disposal of over half the waste identified by the Environment Agency is unknown, it is known that recycling and recovery rates are increasing. Landfill may continue to be the only option for certain types of waste but quantities associated with this can also be expected to decline rapidly as costs increase and new methods of reuse, recycling and recovery are introduced.

Construction, Demolition and Excavation Waste

- 7.44 This is also a difficult waste stream to quantify. The great majority of material is dealt with on site (crushing and reuse of demolition waste for example) and so is not officially classified as waste. Those materials taken off-site may be treated elsewhere or simply sold on, for example, as hardcore. However Table 7-3 shows how quantities recorded by the Environment Agency in 2008 were dealt with.

Table 7-3 Disposal of Construction, Demolition and Excavation Waste, 2008

• 461.86 tonnes recycled	0.97%
• 42,759.55 tonnes reprocessed	89.9%
• 370.46 tonnes transferred	0.78%
• 3,414.5 tonnes unknown	7.1%
• 524.86 tonnes landfilled	1.1%
Total 47,531.23 tonnes	

In addition to this some 6,010.8 tonnes of inert wastes were reprocessed.

- 7.45 It can be assumed that all reprocessed material was reused in one way or another. The proportion needing final disposal was very small.
- 7.46 Most treatment – crushing, washing etc. – is carried out on the site where the waste arises, using mobile plant. Material that cannot be dealt with in this way is normally taken to local depots for sorting, grading and so on and then sold on as construction or recycling material.
- 7.47 Facilities available for this are currently limited in Medway. There is some capacity at Knight Road in Strood but this will need to be relocated as the Temple Waterfront regeneration area comes forward for redevelopment.

Hazardous Wastes

- 7.48 Hazardous waste can arise from all waste sectors. The Environment Agency's Hazardous Waste Interrogator 2008 showed that some 22,245 tonnes of Medway's wastes were recorded as hazardous, of which 12,799 tonnes were managed in Medway. The data shows that hazardous materials were transferred nationally, illustrating the complex nature of this waste stream with relatively small quantities often being taken to a few specialist treatment and disposal facilities nationwide. Medway has a recorded negligible amount of Low Level Radioactive wastes that are part of this stream.
- 7.49 The Medway site operator waste return interrogator 2008 detailed company activity as set out in Table 7-4.

Table 7-4 Disposal of Hazardous Waste, 2008

• Recycled 266.43 tonnes	1.8%
• Reprocessed 5,745.31 tonnes	39.6%
• Treatment (unspecified) 2,509.69 tonnes	17.32%
• Incinerated 813.79 tonnes	5.6%

• Landfilled 248.47 tonnes	1.7%
• Unknown 4,901.45 tonnes	33.8%
Total 14,484.14 tonnes	

7.50 Facilities within Medway catering for hazardous wastes include tyre shredding and waste oils recycling plants at Kingsnorth and metal recovery at Medway City Estate with the following capacities:

- 167,500 tonnes per annum oil/water waste treatment
- 147,125 tonnes per annum metals ferrous/non-ferrous recovery
- 74,740 tonnes per annum photographic and printing waste disposal and recycling, including silver recovery and refining
- 3,650 tonnes per annum asbestos wastes treatment and transfer.

7.51 There are no arisings of low-level nuclear and limited radioactive wastes in Medway and so local provision is not necessary for such material.

7.52 Regional analysis identified priority needs for hazardous waste capacity in the form of:

- Additional hazardous waste landfill capacity in the south and south-east of the region (prior to the new waste hierarchy being introduced)
- Treatment facilities for air pollution control residues (primarily flue residues from controlled processes)
- Treatment facilities for waste electronic and electrical equipment (WEEE); and
- Sub-regional networks of contaminated Construction Demolition and Excavation waste treatment facilities.

7.53 It was suggested that authorities should:

- Identify and safeguard sites for the storage, treatment and remediation of contaminated and demolition waste
- Identify criteria for the determination of large-scale specialist hazardous waste facilities, and a network of landfill cells for stabilised non-reactive hazardous wastes.

London's Waste Exports

7.54 Medway is still technically required to have regard for London's waste exports. However it is increasingly likely to be the case that any materials will be residues from higher order waste management processes. The quantities are unclear and the London authorities and commercial operators have expressed no interest in new landfill capacity.

7.55 It is expected that the Government will clarify its position on this in due course but given the absence of any current demand in Medway it is not intended to make specific provision for London's waste.

The Strive for Overall Self Sufficiency

7.56 Medway has an array of facilities and associated capacity for the management of waste but whether these deal with materials generated in

Medway or they are brought into the area is largely a matter for the operators and their commercial contract arrangements.

7.57 For the future, the priorities are therefore to:

- Ensure there is sufficient capacity for waste handling, recycling and treatment for each of the waste streams, including transfer capacity for municipal waste
- That there is adequate collection infrastructure, given increasing separation of different wastes at source
- Consider whether specific provision should be made for new landfill capacity and, if so, whether this should be for non-inert or hazardous wastes, or a combination of these.

7.58 Medway City Estate and Kingsnorth are already established as centres for waste handling and treatment and, subject to market demand, further expansion would be appropriate provided relevant environmental standards are met.

7.59 With rapid developments in the waste management field it is difficult to forecast what specific collection and transfer facilities will be required over the plan period but these can usually be readily dealt with in conjunction with the planning of new developments and in the established employment areas.

7.60 Landfill capacity across the South East is declining rapidly but that is also the case with the quantity of material that needs to be disposed of in this way. Providing new capacity is almost wholly dependent on having suitable void space and the right geological conditions.

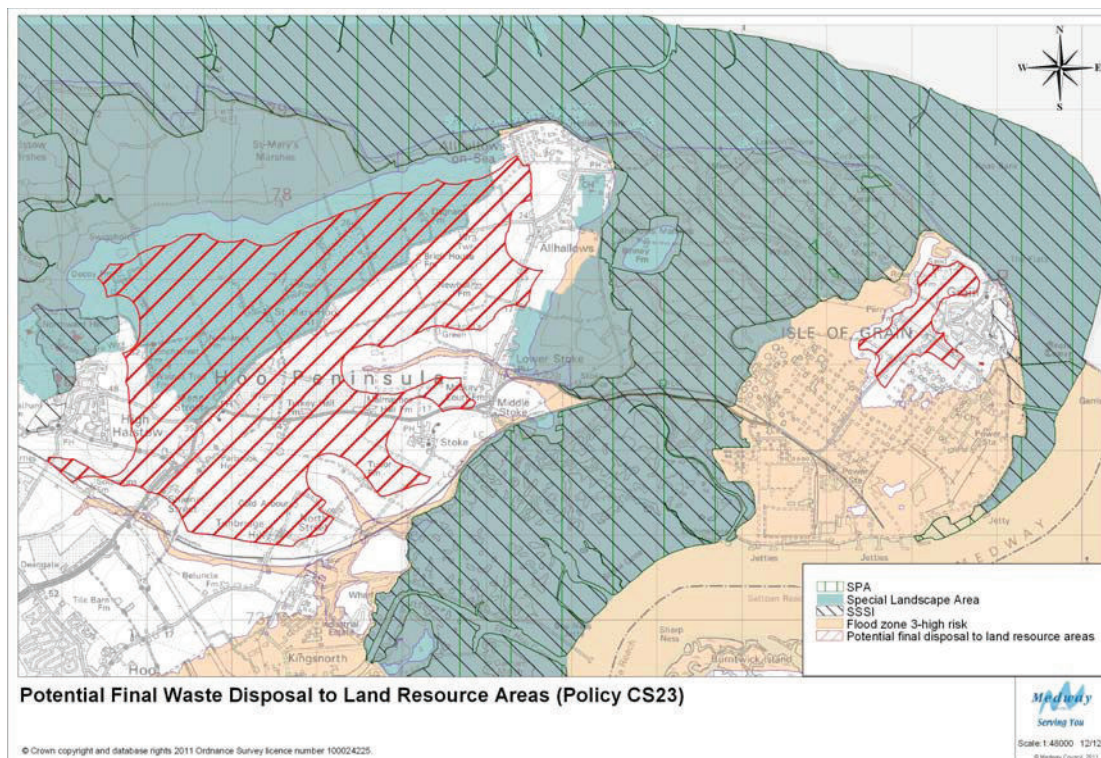
7.61 Much of Medway sits on chalk, a highly permeable rock, unsuitable for non-inert and hazardous waste disposal. However chalk quarries can and have been restored using inert materials. The Hoo Peninsula, on the other hand, is overlain with London Clay and this impermeable material is well suited for the landfilling of non-inert and hazardous materials that cannot be disposed of in any other way. However there are no existing voids so any provision would either involve the creation of new void space by extraction of cover material or re-profiling land by raising its natural contours or a combination of the two approaches.

7.62 It would appear that Medway's arisings from all sectors, including hazardous wastes, are not sufficiently large to justify the investment required to create new void space, though cross boundary flows of wastes historically occur and this may well distort what would otherwise be 'perfect' self-sufficiency in an area's range of waste management capacities including final disposal to land. The Hoo Peninsula is also remote from major markets adding to transport costs and the environmental impact of transporting materials.

7.63 Given these considerations no specific allocations for new landfill/landraise facilities are proposed but Policy CS23 includes appropriate criteria for determining any proposals that might come forward. The potential final waste disposal to land resource areas that are relatively free of strategic constraints are shown in Figure 7-2 below.

- 7.64 A particular characteristic of the Thames Gateway is the number of redevelopment sites where the ground has been contaminated by previous uses. These soils and other materials need to be treated before the sites are reused. Frequently this is done on site using a variety of techniques but some practitioners have called for 'cluster' facilities where material can be brought for treatment where this is not practical on site. The Council has carefully assessed the need for such a facility but has found no evidence of market demand for it. Nevertheless it will carefully consider any proposals that might come forward against the criteria in Policy CS23.

Figure 7-3 Potential Final Waste Disposal to Land Resource Area



Policy CS23: Waste Management

Provision will be made for the collection, reuse, recycling, treatment and disposal of Medway's waste by:

- Ensuring all new built developments make appropriate provision for the separation, storage and collection of waste materials
- Permitting facilities for the reuse, recycling, treatment and transfer of waste materials, subject to their being of an appropriate environmental standard. Medway City Estate and Kingsnorth and, at a lesser scale, the existing established employment areas are the preferred locations for such activities
- Assessing the potential for a soil treatment facility, subject to acceptable local environmental impacts, adequate access arrangements and any impact on residential amenity.

Any proposals for the creation of void space or landraising to facilitate a disposal facility for non-inert or hazardous materials within the areas referred to as the Potential Disposal to Land Resource Areas on the Hoo Peninsula and the Isle of Grain will be assessed against the following criteria:

- Impact of development on rural landscape character and local distinctiveness. To be judged against characteristics and guidelines as set out in the Medway Landscape Character

Assessment

- Other local impacts, including on residential amenity, being acceptable
- The site being well related to the primary road network and with suitable site access and egress arrangements
- It being clearly demonstrated that the materials to be deposited cannot be reasonably disposed of in any other way (that is that they are irreducible residues)
- That the facility will handle a high proportion of such waste arising within Medway and the immediately surrounding area to ensure a sustainable pattern of disposal
- Unless a specific needs case can be demonstrated, that wastes to be deposited do not involve a road haulage distance of more than 50 miles
- That all the reasonable requirements of the Environment Agency can be satisfied
- There being a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site.

8. Transport and Movement

Introduction

- 8.1 As an all-purpose unitary authority Medway Council is also a transport authority, responsible for the local highway network, public rights of way and other transport related infrastructure. This includes 840 km of adopted highway and 293 km of public rights of way, plus the Medway Tunnel.
- 8.2 However the Council has no specific responsibility for the rail network or commercial bus services, although it works closely with all operators and with the Highways Agency, which is responsible for the motorway and trunk road network. There are no trunk roads in Medway but the M2 runs through the area.
- 8.3 In this role the Council is required to prepare a Local Transport Plan, setting out an overall transport strategy for the area. Medway's third Local Transport Plan or LTP3 has recently been adopted and it is purposely aligned to both the Local Development Framework and the Sustainable Community Strategy. It runs to 2026. Its main provisions are summarised below.
- 8.4 It follows that the transport and movement strategy underpinning this Core Strategy closely mirrors and is informed by the third Local Transport Plan but with an emphasis on those aspects that affect the programming of development or have implications for land or property.

Thames Gateway Funding and LTP2

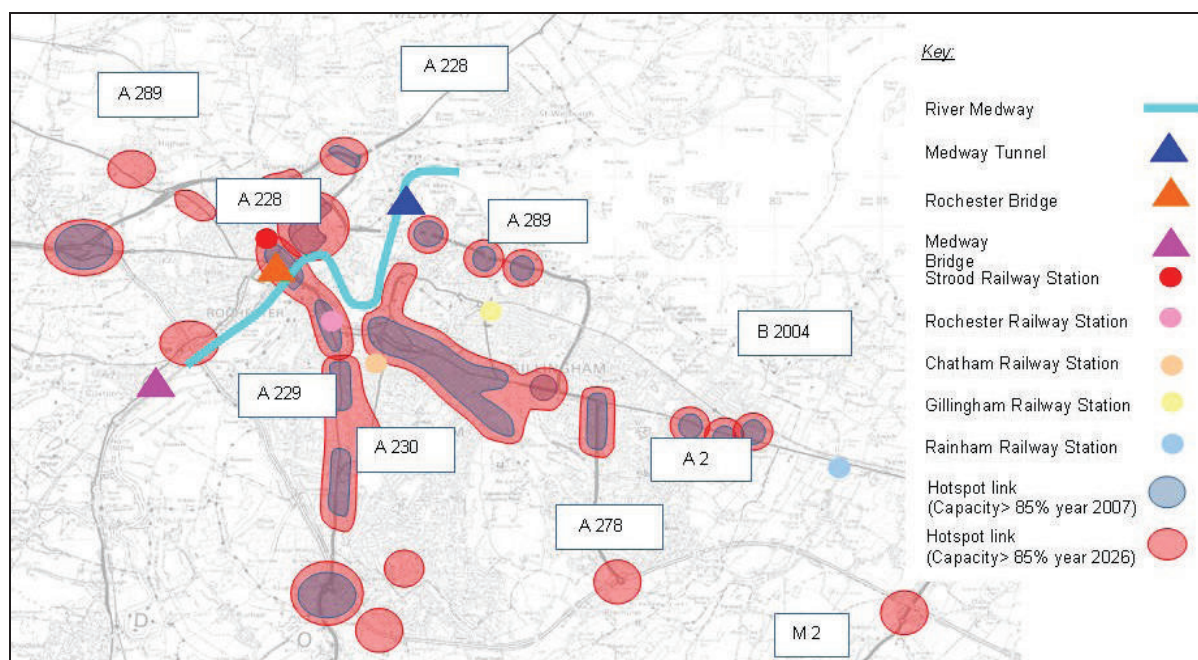
- 8.5 Due to its strategic location within the Thames Gateway, Medway received substantial capital funding from the Department of Communities and Local Government, the Department for Transport and the Homes and Communities Agency for a range of transport initiatives running through to 2011. These included funding to remove the flyover in Chatham, returning the town to a two way traffic system, widening the Brook etc., improvements to Gillingham rail station, construction of a new 'dynamic' bus station in Chatham and over £13 million for bus infrastructure and bus priority measures to begin to create a quality bus network. In 2011 a comprehensive Urban Traffic Management Control (UTMC) system went live. Further improvements to the A228 to Grain were also underway.
- 8.6 This funding addressed longstanding problems and introduced new capacity to the highway network. Significantly it also created capacity to accommodate development on the major regeneration sites in the short term.
- 8.7 Over the longer term however further interventions will be required to offset background traffic growth and these are the focus for LTP3.

Context and Priorities

- 8.8 As indicated, the major challenge is to address the increased demand for travel that will arise over the longer term. At the same time it is recognised that transport influences and adds value to many key priorities including economic growth, the natural environment, connectivity, equality of opportunity and health.

- 8.9 With a development strategy that specifically seeks to accommodate future development within the existing main urban area and at Lodge Hill, new primary transport links are not required to realise development. Local improvements are required in a number of cases but these do not, by themselves, have a strategic impact. Instead the emphasis needs to be on the more effective management of existing networks and selective investment to tackle congestion hotspots and improve public transport options and capacity to offset general traffic growth.
- 8.10 This has been confirmed by intensive analysis, including the development of several transport models, one of which is an area wide SATURN model (Simulation and Assignment of Traffic to Urban Road Networks), which has been developed in partnership with the Highways Agency. The forecast effects without further intervention are illustrated in the following diagram.

Figure 8-1 Main Congestion Hotspots



- 8.11 Further details are contained in a technical report prepared by the Council's modelling consultants, Transport Issue & Preliminary Options Report Phase 1 – 2nd Issue, April 2009.
- 8.12 Consequently five overarching priorities have been set out in the third Local Transport Plan to guide future policies and programmes. These, and the key actions proposed under each are set out below:

Supporting Medway's regeneration, economic competitiveness and growth by securing a reliable and efficient local transport network

Key actions:

- More efficient management of the highway network and car parks
- Improvements to the strategic road network focusing on congestion hotspots
- Improving the quality of bus services, including the development of *Fastrack* style bus links and smart ticketing
- Better management of freight, including improved access to the International Gateway at Grain
- Encouraging walking and cycling for short journeys
- Investigating river transport and additional river crossings.

Supporting a healthier natural environment by contributing to tackling climate change and improving air quality

Key actions:

- Encouraging alternatives to the private car by:
 - Improving the quality of bus services, including the development of *Fastrack* style bus links
 - Encouraging walking and cycling for short journeys
- More efficient management of the highway network including air quality, traffic management schemes and tackling congestion hotspots.

Ensuring Medway has good quality transport connections to key markets and major conurbations in Kent and London

Key actions:

- Improved sub-regional public transport services and facilities to connect Medway with key business centres and labour markets, including improvements to railway stations
- Longer distance trips into Medway captured by park and ride services to reduce town centre traffic
- More coordinated sub-regional highway network management by improved partnership working with the Highways Agency and Kent County Council
- Encouraging commuters to cycle to railway stations as part of their outward journey to work
- Development of sub-regional cycle routes.

Supporting equality of opportunity to employment, education, goods and services for all residents in Medway

Key actions:

- Improving accessibility to bus services for people with mobility difficulties
- Supporting students to access the learning quarter by public transport, walking and cycling
- Supporting independence by maintaining socially necessary bus services and providing transport services to day services
- Revised design guidance for new developments that supports improved accessibility by walking, cycling and public transport
- Community transport schemes.

Supporting a safer, healthier and more secure community in Medway by promoting active lifestyles and by reducing the risk of death, injury or ill health or being the victim of crime

Key actions:

- Road safety interventions incorporating highway schemes, education, publicity, promotion and enforcement
- Safer routes to school initiatives
- Encouraging cycling
- Improved pedestrian access to local facilities
- Development of Green Grid and the Coastal Access initiatives, and improving public rights of way
- Public safety initiatives
- Effective highway maintenance, including footways and cycleways.

8.13 Specific schemes to address these matters are grouped under five transport objectives and programmed as follows:

- Short term: April 2011 to March 2016
- Medium term: April 2016 to March 2021
- Long term: April 2021 to March 2026.

8.14 A full list of schemes and actions can be found in Appendix E.

8.15 Although many actions and schemes are proposed over the life of this plan it is expected that the great majority will not require additional land, other than as an integral feature of new built developments. However some schemes to address congestion hotspots may do so, depending on detailed designs, and these are listed below:

- A289 link between Four Elms roundabout and Medway Tunnel including Sans Pareil and Anthony's Way roundabouts and exit from Medway City Estate
- A2 junctions and link between Chatham Hill and Canterbury Street junctions
- A2/A228 links through Strood town centre
- A2 junction with Mierscourt Road, Rainham

8.16 The M2 through the area was widened and upgraded only a few years ago. Generous carriageway capacity has been provided and most junctions operate satisfactorily. However Junction 3 (Chatham) is an exception. This is a very large and complex junction that caters not only for motorway traffic but also local traffic accessing the A299 (Bluebell Hill) between Medway and Maidstone. The junction is located outside of the Medway boundary but significant amounts of traffic using it originate in Medway.

8.17 The Highways Agency is concerned that further growth would impact on this junction, notwithstanding the fact that there are few significant proposals for

new development close to it. Given this situation the Council will work with the Agency and the adjoining transport authority (Kent County Council) to seek to identify possible measures to divert some local traffic using the junction. However given the short time since the junction was rebuilt it is expected that the Agency will also consider what further investment it should make in improving the junctions performance.

Other Transport Related Issues

- 8.18 LTP3 considers a number of aspects of river transport and the role of the major port facilities. These include identifying the need to protect and possibly supplement existing piers to support possible river bus/taxi services. It does not consider aviation issues as these have very localised impacts and no scheduled services operate from Rochester Airport.
- 8.19 However it is important that the Core Strategy takes full account of the planning implications of these matters.
- 8.20 In the case of both the River Medway and the Thames, “saved” local plan policies give protection to a number of local wharves as well as the larger docks at Chatham and Thamesport. These include a strategically important aggregates importation wharf at Cliffe, wharves on Medway City Estate and a wharf at Halling. All benefit from reasonable landward access and are well established. It is intended that they and their associated facilities and sites should continue to be safeguarded over the longer term in order that the area can continue to contribute to national, regional and local needs for maritime capacity.
- 8.21 Thamesport is an international gateway and is a nationally significant container port with potential for further growth together with the development of ‘value added’ activities on adjoining land (Grain employment area). Both safeguarding it and facilitating its further development is therefore appropriate.
- 8.22 Chatham Docks caters for smaller vessels – up to 8,000 tonnes – with lock gates controlling access from the Medway. The site and associated facilities need reinvestment but there is every indication that it has a long-term commercial role, complementing the larger ports catering for deep-sea traffic and handling vessels too large for local wharves and jetties. Accordingly it is intended that it should continue to be safeguarded although some consolidation within the site may be possible.
- 8.23 Over many years efforts have been made to encourage water taxi style services along the urban waterfront, particularly to cater for visitors during the summer months. Despite a number of piers and landing places being available this has not proved viable but it is considered important to safeguard these facilities for the future. The continuing development of major visitor attractions on or close to the riverbank and the increased population that will result from the redevelopment of the waterfront regeneration sites may well present new opportunities, as may the proposed park and ride site at Whitewall Creek. The relevant locations are:

Piers and Jetties:

- Commodore Hard
- Lower Upnor Pier
- Chatham Maritime Marina
- Thunderbolt Pier
- Sun Pier
- Strood Pier
- Rochester Pier

8.24 In terms of aviation there are two established facilities:

- Rochester Airport – a general aviation facility with two grass runways, catering for leisure flying, flight training and some emergency service uses. It is subject to airspace safeguarding by the Council
- Stoke Microlights – this is a small, unlicensed, facility situated relatively close to the large employment area at Kingsnorth. There is currently no safeguarding regime in place, either for the limited facilities on the ground or the surrounding airspace.

8.25 Facilities at Rochester Airport need reinvestment and upgrading and the current operator is working closely with the Council to see how this might be achieved, while also ensuring that adjacent land can be fully utilised for employment purposes (see Economy chapter). Investigations are ongoing and it is expected that a masterplan covering both the Airport and surrounding land will be agreed in the near future.

8.26 The Stoke facility is limited in scale and constrained by high voltage power lines and other features. Accordingly it is not proposed to afford it long term safeguarding.

Transport and Development

8.27 Although some continuing growth in private car traffic is probable, it is vital that alternatives are available if congestion along many urban routes is not to reach unacceptable levels.

8.28 The urban regeneration areas are exceptionally well located in relation to existing bus routes and the mainline rail stations and so can contribute to the enhancement of these facilities, as opposed to catering solely for the car.

8.29 In the case of Lodge Hill and the larger employment areas some highway improvements will be required but there are still opportunities for public transport solutions that will contribute to meeting the demand for non-commercial movements arising from these developments.

8.30 Accordingly it will be important, in all appropriate cases, to strike a balance between design solutions catering for the car and providing other choices, whether they are public transport, walking or cycling.

8.31 This will also be critically important in the town centres and Chatham in particular. Here adequate and high quality public parking, geared towards the short stay visitor, is important for their commercial viability. However employees and shoppers must also have access to high quality bus (including

park and ride) and rail options if congestion is to be managed and high quality environments created and maintained.

- 8.32 Taking account of the varying factors set out above, and proposals in the Local Transport Plan, Policy CS24 sets out the key planning principles that will be applied over the plan period.

Policy CS24: Transport and Movement

Over the plan period:

- The highway system will be proactively managed to minimise congestion, through the operation of urban traffic management and control systems, the development of a quality bus network and selective junction improvements in congestion/air quality hotspots
- Car growth will be balanced by increasing the capacity, reliability and quality of public transport through:
 - The introduction of Fastrack style services on major urban and inter urban routes, including to and from Lodge Hill
 - Four potential park and ride facilities at Horsted, Whitewall Creek, Strood and between Gillingham and Rainham, plus park and coach facilities
 - Improved interchange facilities associated with the railway stations and in the town centres
 - Improved main line railway stations at Strood, Rochester, Chatham and Gillingham
 - High quality real-time information and cross mode ticketing systems.
- Car parking in the town centres, especially in Chatham, will be rationalised (though not reduced in scale) where appropriate into multi storey facilities available for public use. Contributions will be sought towards new town centre car parking in lieu of reduced provision on individual sites
- Lower car parking standards will be considered in areas with already or potentially good public transport availability to provide a realistic option to private car use
- All significant development proposals will be subject to an agreed transport assessment, which includes an assessment of the potential to encourage modal shift away from private car use
- Walking and cycling networks will be extended, catering particularly for local journeys but also sub-regionally, including in conjunction with new developments
- Existing wharf and port capacity will be safeguarded in order to meet national and regional capacity requirements and to encourage the local transportation of goods by water
- A network of piers and landing places will be safeguarded to facilitate the introduction of water bus/taxi services along the urban waterfront, linking visitor and other attractions and providing capacity for visiting vessels
- The Council will continue to work with the operator of Rochester Airport to objectively consider the future of the general aviation facility, bearing in mind its co-location with a strategic employment opportunity.

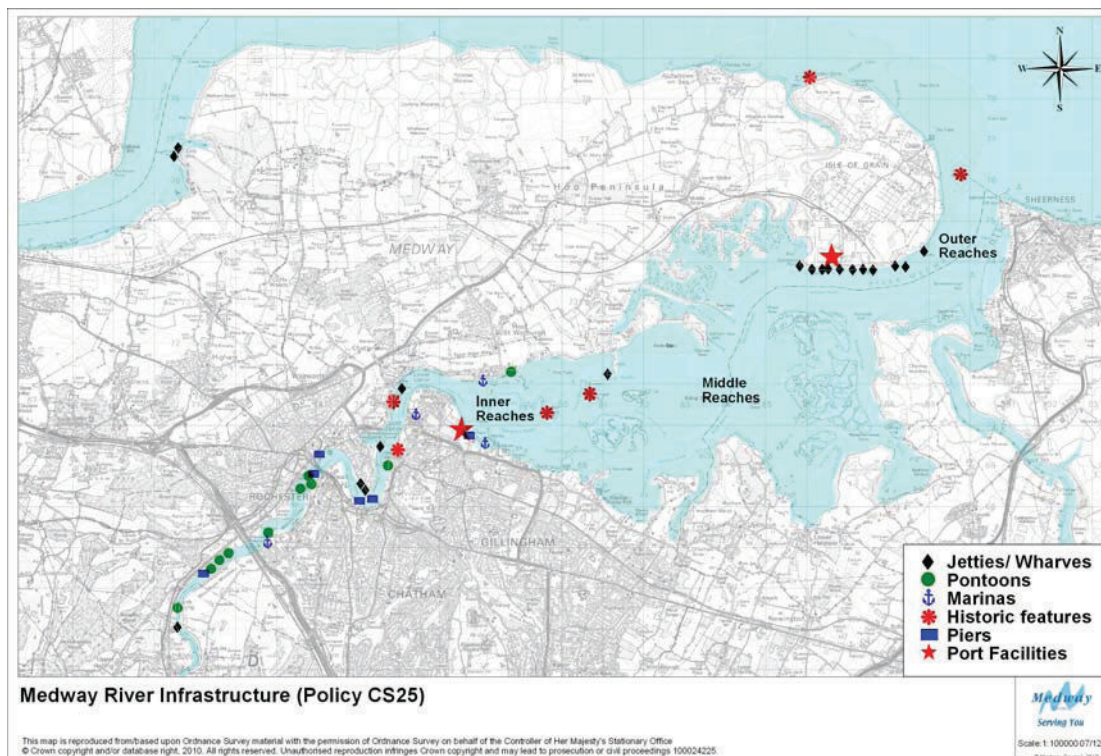
9. The River Medway

Introduction

- 9.1 The Medway is one of the largest rivers in the South East and it is a defining feature of the area. It was made navigable as far as Maidstone in the 17th century and then extended to Tonbridge by 1746. The outer reaches have a naval history dating back to Henry VIII's time. Although the navy has now gone, the Medway is still an important commercial river and is increasingly recognised for its nature conservation value.
- 9.2 The River forms one of the most dramatic and consistent features of the Medway administrative area; providing a strong link as it broadens out from the urban areas towards the marshes and the Thames estuary; weaving together a tapestry that connects a variety of landscapes, settlements and communities. It provides Medway with much of its strong sense of place and it contributes significantly to the identity of the area. The river is also highly visible from many places, providing dramatic views, particularly from strategic points along the waterfront and from areas of higher ground. However it is less accessible in other areas – a legacy from the time when the Navy and industry monopolised the waterfront. The Medway is also home to a significant number of industrial archaeological assets.
- 9.3 The tidal River comprises three reaches – outer (Sheerness to Chetney Marshes), middle (Chetney Marshes to Gillingham) and inner (Gillingham to Allington Lock). The 'Conservator' is the Medway Ports Authority, part of Peel Ports and operator of both Chatham and Sheerness Docks. The conservator has responsibility (below the high water mark) for navigation arrangements, 'trots' or floating berths, associated byelaws and other matters.
- 9.4 The local character of the river and its edges varies along its length. Distinctive natural features within the undeveloped sections of waterfront between Gillingham and Sheerness include extensive areas of inter-tidal habitat, comprising saltmarsh and mudflat. The wooded slopes around Upnor provide particularly dramatic views from the river and from the south bank. Historic military uses are distinctive features along the river, particularly at Chatham Historic Dockyard and at Rochester and Upnor Castles. Developed sections along the north bank include major infrastructure facilities at Grain and Kingsnorth, including power stations and a container port. Within the urban area there is a working port at Gillingham (Chatham Docks). Industrial facilities predominate along the North Bank at Medway City Estate.
- 9.5 The estuary also supports nationally and internationally important populations of breeding and passage birds. It is likely that it will be designated as a Marine Coastal Zone.
- 9.6 Major new housing schemes are replacing former uses at Rochester Riverside and St Mary's Island. There are marinas at various locations, including sites at Upnor, St Mary's Island, Gillingham Waterfront, Strood, Rochester and Cuxton. The rich variety of industrial, historic and leisure uses along the river provides a diverse and varied character with strong local distinctiveness.

- 9.7 Important economic activities along the Medway include the gas terminal and Thamesport container site on the Isle of Grain, coal importation to Kingsnorth Power Station, Chatham Docks and aggregate and other river wharfs. However most of these activities are not major employment generators.

Figure 9-1 River Medway



Management of the Natural Eco-system

- 9.8 Navigation and dredging is an issue. Siltation has increased in the river as dredging activities have reduced following the departure of the Navy and commercial activities have moved downriver to the outer reaches. Over the longer term this has implications for navigation, particularly in the upper stretches.
- 9.9 The extensive inter-tidal habitats bordering the estuary are of international importance for wildlife and designated as both Special Protection Areas and Ramsar sites. However these are under pressure from industrial activity and 'coastal squeeze' whereby the inter-tidal margins are prevented from retreating and re-establishing in the face of sea level rise due to flood defence structures.
- 9.10 New habitat creation opportunities therefore need to be sought in order to mitigate for the loss of inter-tidal habitats (marshes), in accordance with the Environment Agency's Regional Habitat Creation Programme as required by the Marine and Coastal Access Act 2009.
- 9.11 Consultants have completing an update of the Strategic Flood Risk Assessment for the Medway and an associated appraisal of the potential options to manage flood risk in the Urban Medway (providing the basis for a Strategic Urban Flood Defence Strategy). This puts forward options for

managing flood risk for new development which are largely based on flood defence asset replacement and do not consider protection that could be afforded by a combination of flood risk management measures. The Study indicates which approach will be best in different flood cells. Currently, there are different standards and levels due to different land ownerships and engineering works of different ages. It is accepted that, although a large part of the urban waterfront is located within the flood plain, it needs to be defended due to the long established settlement form and the value of the commercial assets that would otherwise be at risk. Beyond the current urban boundaries however it is important to avoid inappropriate development that would increase flood risk and reduce the capacity to store flood water.

- 9.12 In addition to the Green Grid, the Core Strategy also supports the creation of a 'Blue Grid'. This encompasses a network of rivers, ditches, wetlands, ponds and lakes. As well as providing valuable habitat, this network is essential to hydrological functioning. The Blue Grid will assist in reducing flood risk, reducing the impact of pollution, and allowing the free passage of species.

Regeneration

- 9.13 The urban waterfront is the focus for Medway's regeneration activity, with over 900 hectares of brownfield land spanning 11 spectacular kilometres of the River Medway. At its heart is Chatham Centre and waterfront. The Medway Waterfront Strategy (2004) proposed the creation of a new linear waterfront city, composed of a series of urban quarters. Each quarter will contribute its own particular sense of place to the overall character of the waterfront. It identified its unique characteristics as including:
- A series of spectacular meanders of the River, framed by steep escarpments, that create the opportunity for stunning views and visual connections between the urban quarters
 - Substantial areas of green spaces, largely a result of the military fortifications associated with the Chatham Historic Dockyard, forming a distinctive backdrop to the urban areas
 - The River Medway is both a busy working river and an important ecosystem. The intertidal sand and mudflats are particularly important as a food source for migrating birds and as spawning grounds for fish such as sea bass
 - The undeveloped coast and internationally significant wetland further downstream is designated as a Special Protection Area for migrating birds. The North Kent Marshes on both sides of the river provide dramatic landscapes and wildlife habitat as well as being used as grazing land; and
 - The waterfront includes some of the most intact and finest historic features. Rochester Castle and Cathedral are among the oldest in the country and Rochester's historic High Street contributes significantly to the environmental quality of Medway's Waterfront. During the mid-17th century the Historic Dockyard at Chatham became the Royal Navy's pre-eminent shipbuilding and repair yard. Chatham's naval and military heritage is amongst the most important in the world and the

Government has included it on a list of locations to be nominated to the United Nations for World Heritage Site status.

Marine Leisure

- 9.14 Marine leisure activities primarily consist of yachting and motor boating along the middle and upper reaches of the river, largely away from conflict with the bulk of commercial activities elsewhere. Existing marinas operate at or close to full capacity. It is recognised that better co-ordination between marina operators is desirable, in order to improve Medway's leisure boating offer. Residential houseboat moorings occupy areas that could be utilised for additional marina berthing. Many of the houseboats have limited facilities and are often somewhat unsightly. Therefore, proposals for upgraded or new high quality marina facilities and amenities will be supported where there will be no adverse environmental impacts. In particular, impacts upon the SPA.
- 9.15 River access to shore facilities, attractions, shopping areas, restaurants and public houses require improving.
- 9.16 There are also a significant number of marine engineering and boat repair businesses that have an important role within the local economy.

Chatham Docks

- 9.17 Chatham Docks occupies one of three basins of the former naval dockyard. It has a range of commercial and industrial tenants within the 56 hectare dock estate. It can cater for vessels up to 8,000 tonnes and so complements both deep water facilities further down the river and smaller commercial wharves and jetties upstream.

Wharves, Piers and Jetties

- 9.18 A coherent network of piers and landing places exists along the urban stretches of the river but some are in disrepair. There is considered to be real potential to develop tourism based water taxi or other services between these facilities, despite this not being commercially viable in the past. In some measure, this is due to the significant tidal range in the river but, as redevelopment along the waterfront gathers pace, new opportunities should arise. However, there are a very limited number of public launching places on the river. Accordingly the retention and protection of existing and disused wharves, and public piers, and access land to them will be promoted.
- 9.19 The river is also strategically important for the importation of construction aggregates and it is important that adequate capacity is retained.
- 9.20 Facilities for visiting vessels are currently limited but there is significant potential for this, not only small craft but also certain types of cruise ship.
- 9.21 Given not only the great significance and potential of the river but also its vulnerability to flooding and coastal squeeze, it is vital that it is managed effectively and that an appropriate balance is maintained between its commercial, leisure and environmental roles. For this reason the Council has supported the Medway Swale Estuary Partnership since its formation in the 1990's. The Partnership brokers contact between the many interests along

the river and encourages an active management regime that balances different interests.

- 9.22 As with other bodies of this type there is some uncertainty over its future but the Council will always seek to work with relevant organisations to ensure that the river is sensitively managed and that an appropriate balance is achieved between different interests.
- 9.23 Proposals that maximise the potential of the River Medway, as a valuable natural resource, will also be supported. The Council will work with the appropriate bodies in order to implement measures that will result in improvements to water quality and pollution levels in order to ensure that the Core Strategy helps achieve the requirements of the EU Water Framework Directive. Financial contributions will be sought from developers to assist this process in appropriate cases.

Policy CS25: The River Medway

The River Medway is strategically significant in terms of its employment, environmental, transport and leisure importance. Accordingly:

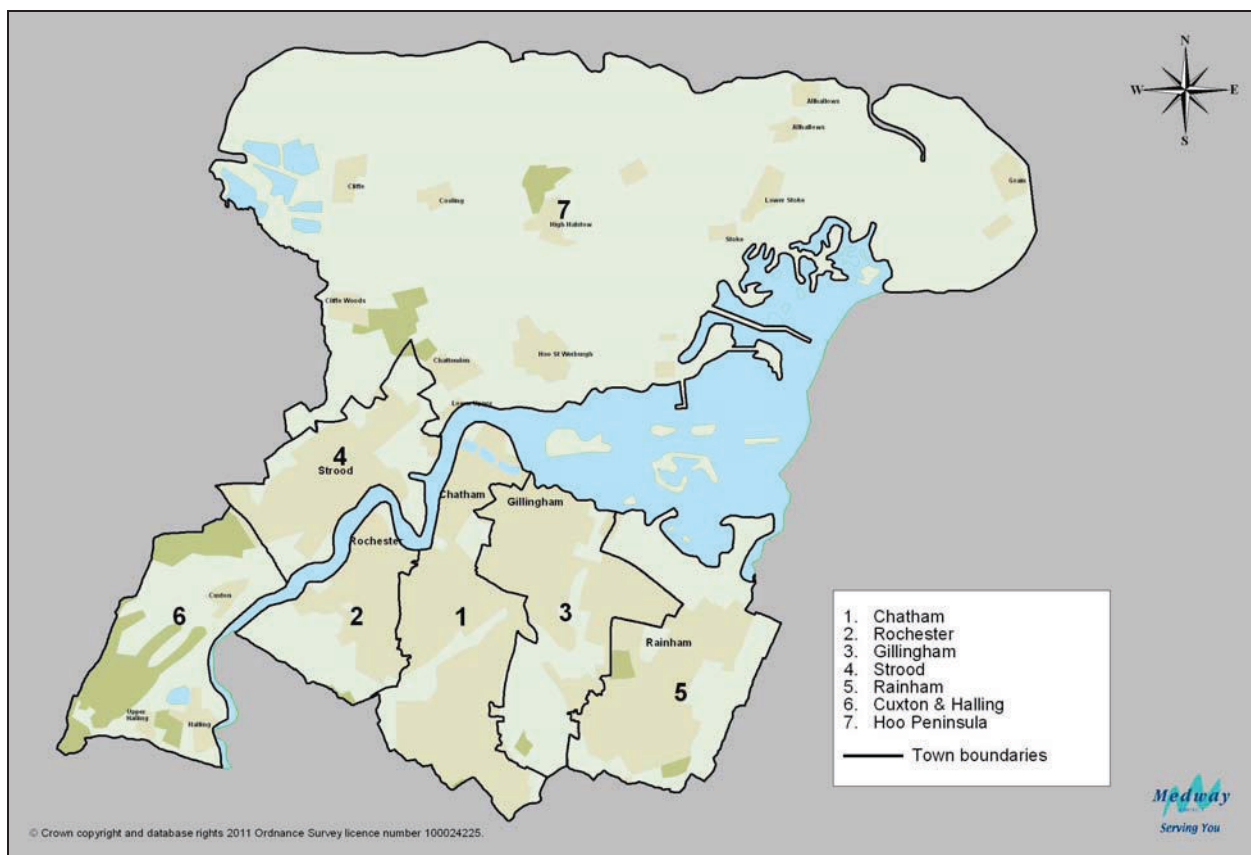
- **Along the urban waterfront mixed use redevelopment will be promoted in order to create safe, high quality environments, provide new homes and jobs, leisure and social infrastructure facilities with public spaces as focal points, a riverside walk and cycle way and increased public access to the river**
- **Greater use will be made of the river. Wharves and port capacity at Chatham Docks and Thamesport will continue to be safeguarded for the transshipment of freight, including waste and aggregates and other materials**
- **Existing infrastructure that provides access to the river and the foreshore, such as piers, jetties, slipways, steps and stairs will be protected unless redevelopment would result in an improvement. New facilities, including piers for river taxis, will be encouraged where appropriate.**
- **Leisure activities on and along the river will be supported as long as they will not harm the environment or natural ecosystems**
- **The river will be protected in its own right, as a key landscape feature of natural beauty.**
- **Proposed development will be expected to either maintain or improve water quality and minimise air, land and water pollution.**
- **The Council will seek contributions from developers for the maintenance and improvement of the river, where appropriate.**

10. Area Policies

Introduction

- 10.1 This section of the Core Strategy sets out how the overall strategy will be applied to specific areas within Medway.
- 10.2 To do this the administrative area has been divided up as follows:
- The five towns – Strood, Rochester, Chatham, Gillingham and Rainham – including their suburban areas and urban/rural fringes
 - The Hoo Peninsula and the Isle of Grain – excluding Lodge Hill
 - Medway Valley – this area needs to be separately considered from the rest of rural Medway as it is located south of the M2 and is therefore outside the Thames Gateway and so falls into what has been termed the “rest of Kent” sub region.
 - Lodge Hill – this is considered separately given the scale of change envisaged for this location.
- 10.3 Figure 10-1 shows the general extent of these areas and context diagrams accompany the sections relating to each area below.

Figure 10-1 Spatial Sub Areas



- 10.4 In these sections the more significant issues facing each area are described and overall policies set out how these will be addressed. Each area has considerable contrasts, such as prosperous and deprived neighbourhoods within it and these are taken into account. The broad scale and location of development that each area is expected to accommodate is also highlighted in table form. The figures in the tables are taken from the Strategic Land Availability Assessment (SLAA) and so indicate what might be termed a baseline capacity for each area. In practice the capacity of some sites and areas may be greater. This is due to the strict rules followed in preparing the SLAA.

Strood

- 10.5 Strood has extensive residential areas bordering the town centre and adjacent rural areas. These vary from pre-1919 terraced streets close to the town centre, to post war estates to the west and modern development, still being completed, at Wainscott and Frindsbury.
- 10.6 The extensive river frontage is of poor visual quality and susceptible to flooding. This reflects its industrial past. The townscape in the central area is also of variable quality and although the town centre is performing well economically it lacks character and suffers from heavy traffic congestion.
- 10.7 Strood is a key employment location with extensive estates at Knight Road/Priory Road and on the Frindsbury Peninsula (Medway City Estate). Despite this much of the town centre and adjoining areas are classified as suffering from deprivation.
- 10.8 Strood station is strategically important, providing mainline services (including High Speed 1) to a number of London termini and acting as the northern terminus for the Medway Valley Line. However it is not welcoming and needs upgrading in terms of longer platforms and access. Links to the town centre are also poor.
- 10.9 The central area has seen a substantial decrease in its resident population since 2001 and it also has a rapidly ageing population. Deprivation factors include 'income' and 'education and skills'. Out of work benefit claims are also high.
- 10.10 The outlying residential areas also have pockets of deprivation related to education, crime and the local living environment.
- 10.11 Wainscott and Frindsbury have the smallest proportion of working age residents in Medway, with more older people and children than the norm. There are relatively high levels of claims for incapacity benefit and carers allowance, indicating underlying health issues associated with older age groups. Deprivation is not significant but the area fares poorly on 'barriers to housing and services'.
- 10.12 Significant steps have been taken to begin the fundamental regeneration of the Town Centre and Riverside with adopted development briefs for Temple Waterfront and Strood Riverside and a masterplan for central Strood that was prepared specifically to inform the Core Strategy. The demolition of the Civic Centre has also started to prepare this prominent site for redevelopment. It is

intended that these sites are taken forward in accordance with the already agreed development briefs and masterplan.

- 10.13 The Strood Town Centre Masterplan has 8 key objectives to guide the future development in the centre of Strood. These are reproduced below as they encapsulate the actions needed to revitalise the central area and improve its image.

1. Capitalise on major developments

To ensure that the planned housing-led development of major sites at Strood Riverside and Temple Waterfront, and future redevelopment of the Civic Centre are all well connected to the heart of the town centre to enable them to support the role and function of the centre.

2. Strengthen the role of Strood's town centre

To improve the retail 'circuit' in the town centre through better connections between the key anchor stores and the High Street, encouraging more linked trips by pedestrians from a single point of access/parking and utilising the redevelopment of the Tesco store to secure an improved retail frontage to the High Street/Commercial Road area. Secure better leisure offer in the heart that will contribute to the vitality of the centre.

3. Improve the appearance of the town centre

To ensure that redevelopment of sites within the Town Centre area contributes to improving the street scene and public realm improvements to key streets and spaces. A number of sites on prominent corners currently make a poor contribution to the street environment, together with key streets that are lined with surface parking. New development should provide buildings that address the street, with parking and servicing located to the rear.

4. Secure Strood as a working town

To protect, enhance and promote employment uses and opportunities in Strood to strengthen and grow the local economy, reduce the need to travel, and promote a sustainable community.

5. Managing the Medway – improving access and flood defences

To ensure that waterfront developments, and other areas affected by flooding contribute to providing broad improvements to the flood defences for the town. New development should also seek to recover and provide physical links to, and along the waterfront, contributing to an accessible and attractive river walk, to improve movement and well-being.

6. Rediscovering heritage assets – promoting distinctiveness

To recover the lost and hidden heritage of Strood and ensure that heritage assets contribute to a high quality townscape and strong sense of place.

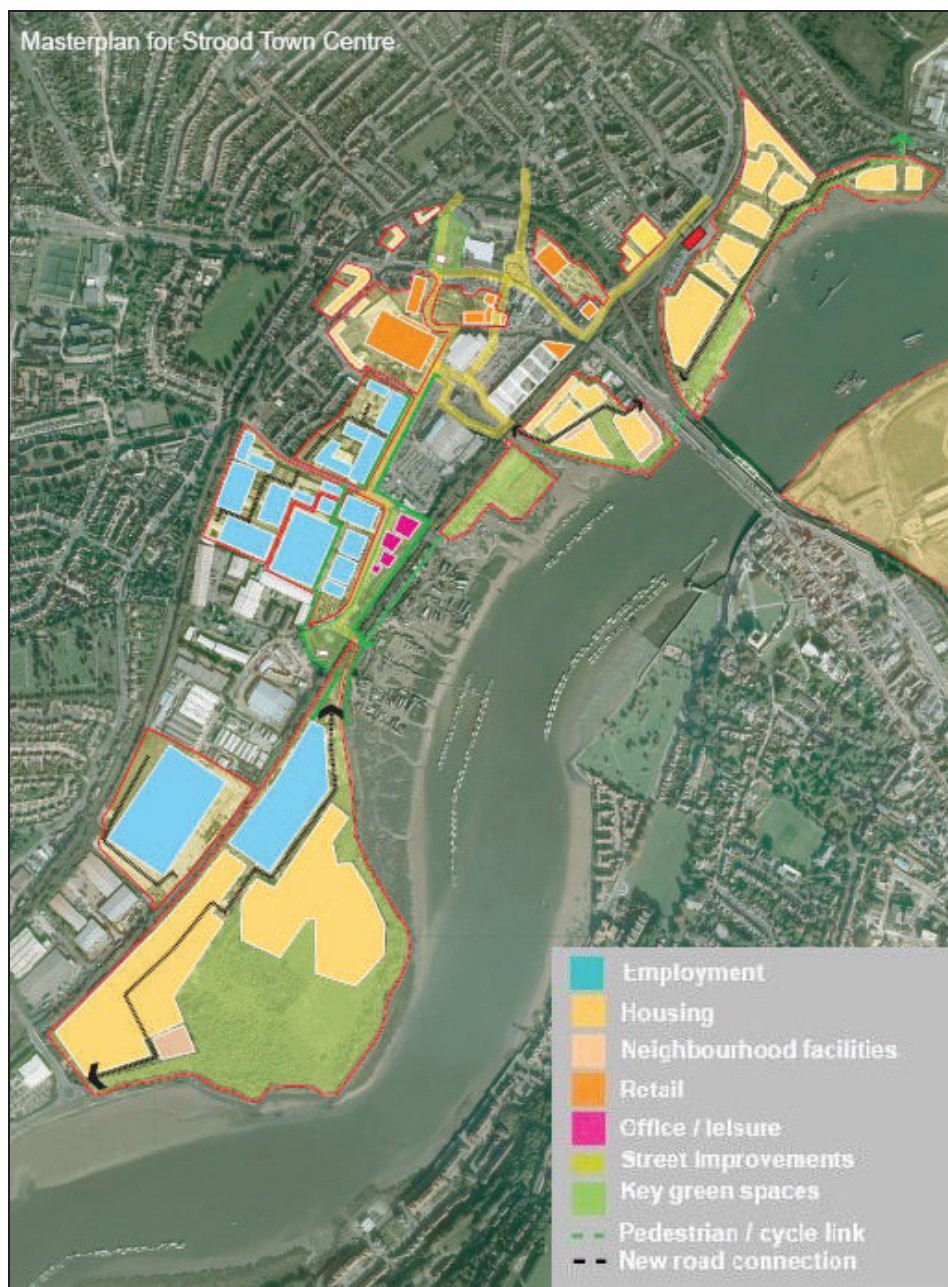
7. Enabling improved access and movement

To ensure that all new development and streetscape improvements contribute to improving safer and more attractive routes for pedestrians and cyclists, facilitate better public transport and minimise the impact of private vehicles on the functioning of the town. Improvements to access for pedestrians to the rail station, and between key shopping facilities, should be prioritised.

8. Promoting open space and urban green space

To ensure that the redevelopment of the waterfront also respects the ecological and recreational benefits of the area and to encourage the waterfront landscape to inform landscape design and new and improved open spaces within the town centre.

Figure 10-2 Strood Town Centre Masterplan



- 10.14 By comparison to some other parts of the conurbation, the outlying residential estates are fairly well served by local centres providing a variable range of services and shopping. The most important of these are:
- Bligh Way, Wells Road and Darnley Road – serving Strood South. These will be supplemented by a new neighbourhood centre at Temple Waterfront, in conjunction with the redevelopment of this key waterfront regeneration site.
 - Bryant Road and Frindsbury Road - serving Strood North. Additional facilities will also be provided in conjunction with the Strood Riverside regeneration scheme and associated improvements to Strood Station.
 - Wainscott Road, Wainscott – serving Wainscott and Hollywood Lane. This will be further improved in conjunction with significant residential development already underway at Hoo Road, Wainscott.
- 10.15 It is intended that these locations will be promoted as designated 'neighbourhood centres' offering suitable locations for the concentration of local services and acting as natural focal points for their surrounding communities.
- 10.16 The quality of housing in the suburban areas is of variable quality, varying from tight streets of small terraced properties to large new neighbourhoods, developed since the 1980's.
- 10.17 Open space areas are very limited in the central area but beyond the town centre Temple Marsh has the potential to be a striking waterfront leisure area. Broom Hill enjoys extensive views over much of urban Medway and the river. The Hogmarsh Valley, Manor Farm and Islingham Farm together perform a vital role in separating Frindsbury and Wainscott from Upper Upnor and Lodge Hill/Chattenden and are very prominent from the A289. Although subject to classic urban/rural fringe pressures they also form a prominent gateway to the urban area and it will be important to progress landscape improvements wherever possible.
- 10.18 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

Table 10-1 Potential Housing Development in Strood

Strood Housing Sites		
SLAA Ref	Site Name	Capacity
0090	Strood Riverside	576
0685	Temple Waterfront	620
0137	Civic Centre	398
0522	East of Higham Road, Wainscott	140
0523	East of Wainscott Road, Wainscott	135
	Main Sites	1869
	Other sites	237
	Housing total	2,106

Table 10-2 Potential Employment Development in Strood

Strood Employment Sites		
SLAA Ref	Site Name	Capacity
0137	Civic Centre	18,060
0653	Land fronting Sir Thomas Longley Road Frindsbury	3,160
0654	Land adjoining Southern House, Anthonys Way	2,062
0685	Temple Waterfront Between Knight Road and Roman Way	7,100
0686	Three Acre site, Roman Way	4,440
0727	Brompton Farm, adj. 66 Brompton Farm Road	1,190
MC102881	Land at Norman Close and Knight Road Strood	16,825
0839	Former Alloy Wheels Site Temple Park Priory Road Strood	16,882
0752	Land at Whitewall Road Medway City Estate Commissioners Road	5,623
	Main developments	75,342
	Other sites	-96
	Employment floorspace total (sq. m)	75,246

Table 10-3 Potential Retail Development in Strood

Strood Retail Sites		
SLAA Ref	Site Name	Capacity
0648	Plot 1 Anthonys Way Medway City Estate Frindsbury	9,354
0843	Land adjacent to and Tesco Store Charles Street	5,774
0685	Temple Waterfront Between Knight Road and Roman Way	1,800
0641	Land at Friary Place High Street	1,510
	Main developments	18,438
	Other sites	1,538
	Retail floorspace total (sq. m)	19,976

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

- 10.19 The town centre will continue to be developed as a 'district' scale centre, complementing Chatham and in accordance with the masterplan as outlined above.

Policy CS26: Strood

The role of Strood as a district centre will be strengthened by;

- **Promoting housing and mixed use developments on sites that will enhance the townscape and cohesion of the centre**
- **Improving the quality of retail provision and links between the retail areas and accessibility to the railway station and waterfront**

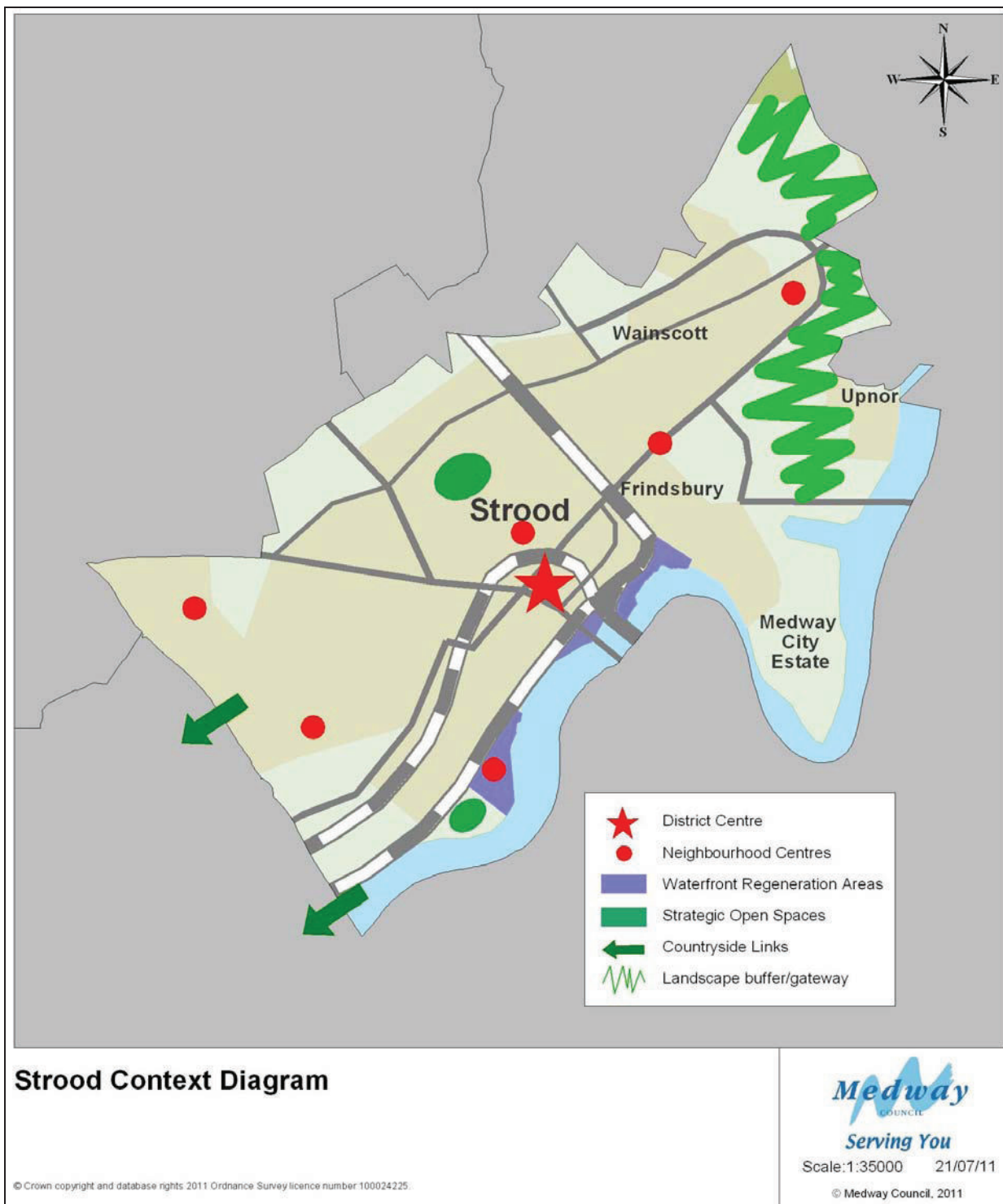
- Safeguarding open spaces and enhancing the public realm, particularly along the waterfront
- Promoting employment opportunities through reinvestment in the existing employment sites and in conjunction with mixed use developments in and adjoining the centre
- Reducing the impact of traffic through improved traffic management and localised junction and other improvements.

Beyond the town centre the following local centres will be safeguarded and promoted as neighbourhood centres:

- Wainscott Road, Wainscott
- Frindsbury Road, Frindsbury
- Bryant Road/Weston Road
- Darnley Road
- Bligh Way
- Wells Road
- Temple Waterfront (new)

Open space areas at Temple Marsh and Broom Hill will be afforded long term protection and, where feasible, landscape improvements will be progressed in the Hogmarsh Valley/Manor Farm/Islingham Farm area to enhance its role as a strategic gateway and in separating settlements.

Figure 10-3 Strood Context Diagram



Rochester

- 10.20 Rochester Town Centre is a nationally renowned historic settlement distinguished by its Norman Castle and Cathedral, which are located on high ground and dominate views from the surrounding area. Its built environment dates from Roman times and the High Street is of the highest architectural importance, containing architectural styles dating back to the medieval period. The Cathedral, Kings School and the Castle are all located in attractive areas of open space and The Vines and the Esplanade complement the open setting of the town centre.
- 10.21 The town centre functions as a district shopping centre for the residential areas to the south, and as a cultural and tourist centre. It contains many specialist shops, restaurants, and other services related to this function. It has a significant evening economy, which can cause tensions with adjoining residential properties. Despite its extensive hinterland it has few convenience shops but it has retained its historic character and avoided damaging, unsympathetic development.
- 10.22 A conservation area appraisal of Rochester together with an area management plan is in place. These documents provide a sound basis for preserving the unique heritage of the centre and managing sensitive change.
- 10.23 During the 1990s, it was recognised that Rochester Riverside exhibited many of the typical hallmarks of dereliction: an out-dated road network; a proliferation of low grade and bad neighbour uses; large tracts of vacant and derelict land and buildings; ground condition problems; a poor local environment; lack of confidence by investors; and fragmented land ownership. The area was in need of comprehensive regeneration.
- 10.24 As a result the site was compulsory purchased and the Rochester Riverside Development Brief adopted. This seeks to achieve a mixed use quarter providing a high quality environment for residential living.
- 10.25 Outline planning permission was granted in 2006, for 2000 dwellings and other uses, including a hotel, and the site was subsequently cleared. The land has been raised, a new river wall constructed, a riverside walk has been laid out and a development partner has been appointed to undertake the first phase of the development, which commenced in 2011.
- 10.26 The historic centre of Rochester and Rochester Riverside are separated by a busy road, Corporation Street and a railway embankment which both have a substantial severance effect. Corporation Street presents an uninspiring, poor quality environment dominated by traffic.
- 10.27 In 2008, the Council adopted the Corporation Street Development Framework, which covers the area from Rochester Bridge to Rochester Station. This proposes a mix of uses including residential, offices, retail, a multi-storey car park and a hotel combined with environmental enhancements, landscaping and improved pedestrian facilities. The intention is to reduce the severance effects of the road, improve the area as a “gateway” to Rochester and to facilitate high quality development that will

complement the historic character of Rochester town centre and the new community at Rochester Riverside.

- 10.28 Beyond the centre lie extensive residential neighbourhoods, extending southwards to Rochester Airport and Borstal. These vary in character and housing quality and a major issue is that those further away from the centre, have few local facilities or obvious community hubs. Limited bus routes and a virtual absence of evening services, results in social isolation for many, particularly the elderly.
- 10.29 The long river frontage from the Esplanade past Shorts Way to Borstal is not exploited to its full potential. In particular there is an absence of local facilities to draw visitors or meet the needs of the extensive adjoining residential areas.
- 10.30 Borstal also lacks a natural centre and further services and facilities are justified given its distance from Rochester centre.
- 10.31 Key open spaces include Watts Meadow, Baty's Marsh and the open slopes around Fort Borstal plus playing field areas at the Alps, Priestfields and Shorts Way. There are few significant employment areas beyond the town centre, with the exception of the BAe Systems site adjoining Rochester Airfield.
- 10.32 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

Table 10-4 Potential Housing Development in Rochester

Rochester Housing Sites		
SLAA Ref	Site Name	Capacity
0598	R/O 329-337 (Featherstones) High Street, Rochester	120
0515	Rochester Riverside	2000
0144	St Bartholomews Hospital, New Road, Rochester	108
	Main development	2,228
	Other sites	712
	Housing total units	2,940

Table 10-5 Potential Employment Development in Rochester

Rochester Employment Sites		
SLAA Ref	Site Name	Capacity
0515*	Rochester Riverside, Corporation Street	12,000
0598	R/O 329 - 377 (Featherstones) High Street	3,600
	Main development	15,600
	Other sites	-1734
	Employment floorspace total (sq m)	13,866

Table 10-6 Potential Retail Development in Rochester

Rochester Retail Sites		
SLAA Ref	Site Name	Capacity
0515*	Rochester Riverside, Corporation Street,	7,800
022	Land at Robins and Day (Peugeot), High St,	2,275
	Main development	10,075
	Other Sites	-632
	Retail floorspace total (sq m)	9,443

**All Rochester Riverside permissions added together as one entry.*

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS27: Rochester

The highest priority will be given to the conservation and enhancement of the historic and architectural character of Rochester Town Centre whilst maintaining its vitality and viability as a district centre and its function and character as a specialist retail, service and tourism centre.

New development will be concentrated in Corporation Street in accordance with the Corporation Street Development Brief and at Rochester Riverside in accordance with the Rochester Riverside Development Brief.

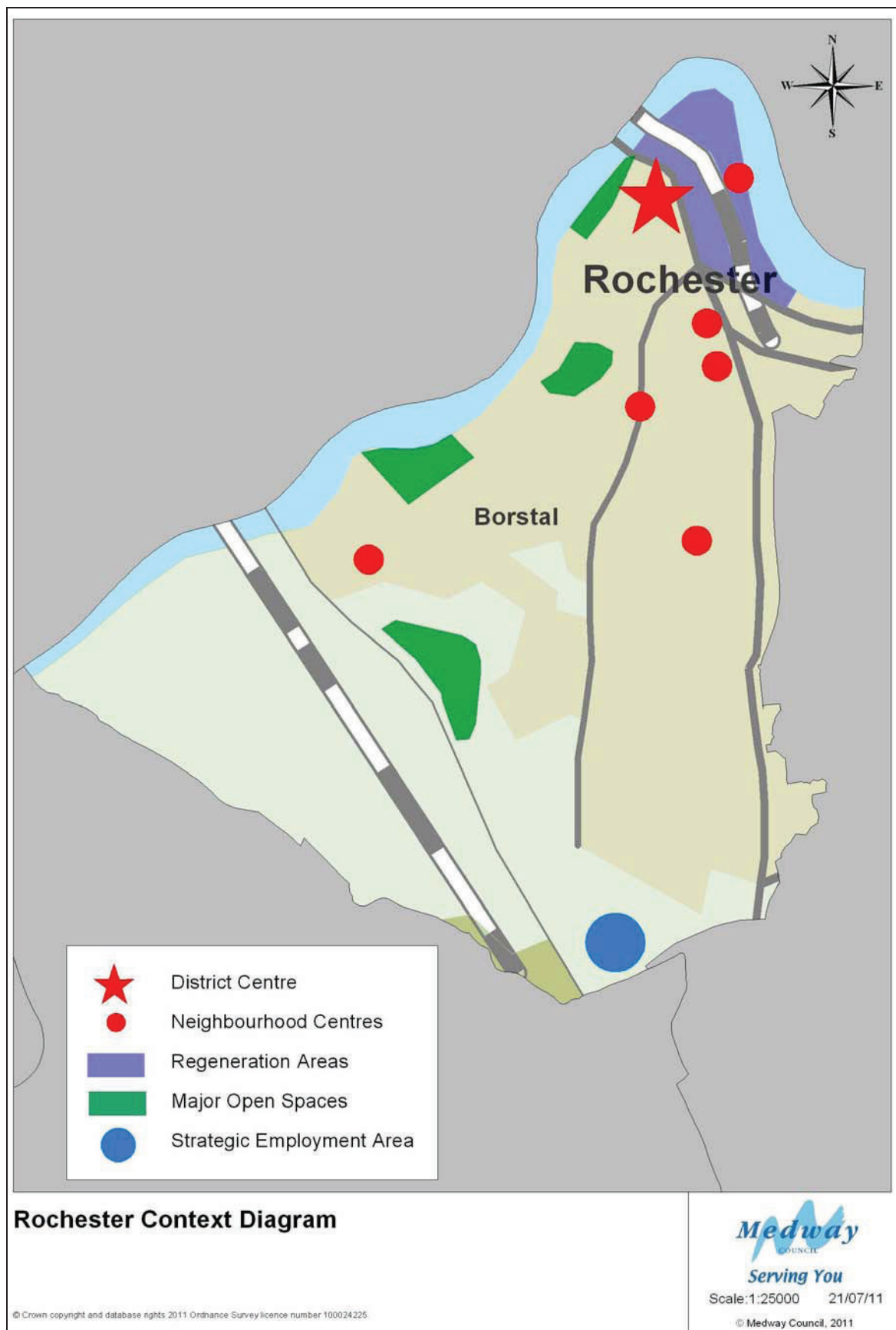
Beyond the town centre the following local centres will be safeguarded and promoted as neighbourhood centres:

- Delce Road
- Maidstone Road
- Marley Way – subject to options and viability testing
- Borstal (new)
- Rochester Riverside (new)

Small-scale opportunities will be sought to provide local employment, particularly in and around the neighbourhood centres.

The Council will work with bus operators to extend access to services in the south of the area.

Figure 10-4 Rochester Context Diagram



Chatham

- 10.33 The Chatham sub area extends from St. Mary's Island and Chatham Maritime in the north to the borders with the Maidstone and Tonbridge and Malling Borough areas north of the M2. It embraces some of Medway's most affluent communities but also its most deprived. The latter include areas to the northeast and south of the town centre and significant parts of Luton and Wayfield, including All Saints. It includes much of the prospective World Heritage Site but also extensive post war suburban neighbourhoods and tight terraced streets of pre-1919 housing.
- 10.34 Chatham town centre is located at the natural heart of the urban area, bisected by major north-south and east-west road links and occupying a potentially exceptional waterfront setting. Other than the river, key landscape features include the scarp slope to the Great Lines and the green dry valley running from Horsted to Luton and incorporating the Coney and Daisy Banks.
- 10.35 The Chatham Centre and Waterfront Development Framework, which was adopted in 2004, addressed a number of long standing problems affecting the centre of Chatham:
- Chatham's role as a sub-regional shopping centre had been undermined by out-of-town developments and competition from other towns
 - The ring road created a hostile environment for pedestrians and severed the centre from its surroundings
 - There were no squares or attractive open spaces within the heart of the town
 - The architecture was barren and unattractive
 - Some of the car parks were unattractive and threatening
 - The railway station was isolated from the centre and dominated by traffic; and
 - The bus station had poor facilities with passengers enduring noise, fumes and cold (in the winter).
- 10.36 The Framework set out the measures necessary to transform the centre of Chatham as summarised below.
- 10.37 Greatly improved shopping and leisure facilities, including:
- Expansion and refurbishment of the Pentagon Centre to increase floorspace by approx. 15,000 sq m
 - A new food store of approx. 8,000 sq m; and
 - Over 8,000 sq m of small-scale employment space and ground floor retail and leisure uses.
- 10.38 A world class cultural waterfront with:
- A major new contemporary performing arts facility on the Waterfront
 - A major new visual arts facility centred on the conversion and re-use of historic buildings at Old Gun Wharf

- A dramatic new Waterfront Park, transforming the quality of the existing green spaces at the waterfront
- Improved visibility and access to historic features, including the Barrier Ditch, and connections to the Great Lines; and
- Hotel development on the waterfront.

10.39 A new central library and learning resource and Civic Office comprising;

- A new central library and learning resource centre (This has now been accommodated in a former military building on the waterfront near Gun Wharf)
- A new Civic Office to meet the changing needs of the Council and to reflect future approaches to integrated service delivery to the community, particularly “First Point of Contact” facilities (This has now been accomplished by the Council occupying the former Lloyds building at Gun Wharf)
- A range of related and complementary facilities, which could include small scale retail and cafes and restaurants; and
- A new public square.

10.40 Major environmental improvements throughout the Centre including;

- New waterfront park and riverside promenade from Old Gun Wharf to Sun Pier
- Greatly improved access to the waterfront by breaking down the severance effect caused by Sir John Hawkins Way and Globe Lane
- Increased use of Sun Pier for boat moorings and related activities
- Greatly enhanced Paddock to provide an attractive and useable civic space; and
- Improvements along the High Street, including the creation of new high quality public spaces within the shopping area.

10.41 Accessibility improvements to, and within, the Centre comprising:

- Returning The Brook and Best Street to two-way streets, with associated environmental improvements (virtually complete)
- Closure of Sir John Hawkins Way and Globe Lane to through traffic and downgrading of Medway Street and Lower High Street (completed)
- Removal of the Sir John Hawkins Way flyover and enhanced streetscape along the route to the flyover (completed)
- Greatly improved public transport access, with new, modern, high technology bus facilities along the route of Sir John Hawkins Way close to the Pentagon Centre and the High Street (virtually completed)
- Enhanced and rationalised car parking, including new, high quality, well located multi-storey car parking to serve the centre
- Improved pedestrian and cycle connections, including links along the waterfront and the possibility of establishing a cross-river link to Medway City Estate.

10.42 Two further supplementary planning documents were also adopted, which provide more detail on specific areas of the town centre. These are the Chatham Pentagon Centre Development Brief, 2005 and the Chatham Centre

and Waterfront Development Brief, 2008. The latter incorporates three masterplans:

- Station Gateway – featuring major improvements to Chatham Station and the creation of a new commercial quarter and pedestrian routes leading down to the Waterfront and High Street
- Waterfront – featuring development of a significant scale near Sun Pier and a radically improved waterfront park
- The Brook – promoting radical improvements to the local townscape and the creation of new residential and commercial uses on the northern side with new connections to the Great Lines and Fort Amherst.

10.43 More recently two further masterplans have also been adopted:

- High Street/Best Street – containing major retail proposals for the shopping heart of the centre, along with radical townscape improvements and new pedestrian links and open spaces
- Gun Wharf – covering the area from the Historic Dockyard to the Waterfront with the objective of bringing to life the rich heritage of this area and linking it to the rest of the town centre.

10.44 All these documents remain relevant to the regeneration of the town centre and the stage has now been reached where private investment will increasingly drive change following the completion of extensive publicly funded infrastructure works.

10.45 Beyond the centre of Chatham are numerous but distinct residential neighbourhoods stretching down to near the M2. Most have well established local centres providing a strong focus for their communities, although they are of varying visual quality. Detailed schemes for their improvement and development should be taken forward in conjunction with local people where resources permit. There are a number of locally important employment areas and retaining these and encouraging reinvestment in them will be important. Initiatives are in place to tackle deprivation in the most disadvantaged neighbourhoods. The emphasis is on improving skills and access to employment. A specific challenge will to sustain and expand these programmes over the longer term.

10.46 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

Table 10-7 Potential Housing Development in Chatham

Chatham Housing Sites		
SLAA Ref	Site Name	Capacity
0033	RSME Kitchener Barracks, Brompton	248
0470	Mid Kent College, Horsted, Maidstone Road, Chatham	414
0472	Land at St Mary's Island, Maritime Way, Chatham Maritime	455

Chatham Housing Sites		
SLAA Ref	Site Name	Capacity
0757	Between Cross Street and The Brook	118
0758	Sir John Hawkins Car Park, Chatham	120
0761	Chatham Waterfront	494
0820	Interface Land	525
0865	2-8 King Street and 1-11 Queen Street, Chatham	158
0867	2-14 Railway Street & 142-146 High Street, Chatham	126
0869	Wickes, New Cut, Chatham	279
0871	Chatham Railway Station	173
	Main Sites	3,110
	Other sites	1,327
	Housing total units	4,437

Table 10-8 Potential Employment Development in Chatham

Chatham Employment Sites		
SLAA Ref	Site Name	Capacity
0243	Chatham Retailing, Clover/Richard/Rhode/High Sts	5,951
0470	Mid Kent College, Horsted Maidstone Road Chatham	2,480
0570	Fort Horsted Primrose Close Chatham	1,139
0724	BAE Systems	11,147
0761*	Chatham Waterfront	5,456
0804	Former Officers Mess, Maidstone Road	4,300
0845	Woolmans Wood Caravan Site	6,160
0862	296-310 High Street	2,040
0869	Wickes, New Cut	30,865
	Main developments	69,538
	Other sites	-2,939
	Employment floorspace total (sq.m)	66,599

Table 10-9 Potential Retail Development in Chatham

Chatham Retail Sites		
SLAA Ref	Site Name	Capacity
0243	Chatham Retailing, Clover/Richard/Rhode/High Sts	28,000
0755	Former Police Station	1,898
0756	Pentagon	15,000
0758	Sir John Hawkins Car Park	3,059
0760	Tesco, The Brook	1,940
0761*	Chatham Waterfront	7,772
0818	J7, Chatham Maritime	5,220
0821	Machine Shop 8, Chatham Maritime	1,200
0834	1 Batchelor Street, off the Brook	1,600
0857	The Brook (r/o High St and Batchelor St)	1,107
0860	Land at High St, Union St and New Road,	9,852
0757	Land at Cross Street Chatham	3,430

Chatham Retail Sites		
SLAA Ref	Site Name	Capacity
0865	2-8 King Street and 1-11 Queen Street	2,531
0866	55-105a The Brook & 1, 5, 11 & 13 King St	4,113
0867	2-14 Railway Street & 142-146 High Street	1,228
0868	19 New Road Avenue and 3 New Cut	1,328
	Main developments	89,278
	Other sites	949
	Retail floorspace total (sq m)	90227

**Chatham Waterfront sites have been combined under one entry*

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS28: Chatham

The centre of Chatham will be developed as a regional hub and as the city centre for Medway in accordance with the principles of the Chatham Centre and Waterfront Development Framework and Development Brief and the regeneration, economic and retail policies of the core strategy. This will include the development of:

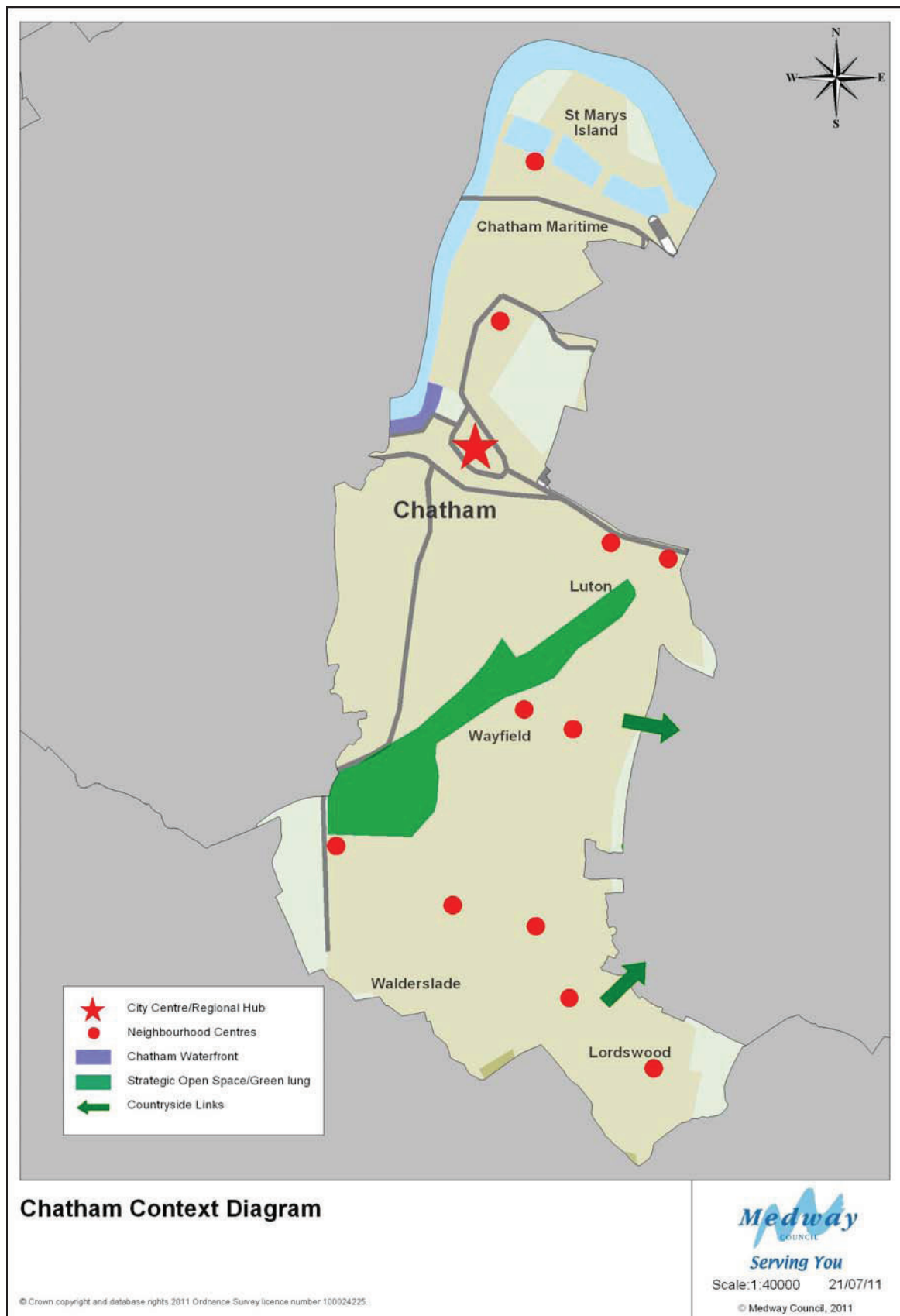
- Greatly improved shopping facilities
- A world class waterfront
- Major environmental improvements
- Accessibility improvements to and within the centre
- New employment floorspace and housing reflecting the five masterplans covering the centre.

Initiatives will continue to reduce deprivation in the more disadvantaged neighbourhoods and beyond the town centre the following local centres will be safeguarded and promoted as neighbourhood centres:

- Chatham Maritime
- Brompton High Street
- Luton Road
- Luton High Street
- Princes Park
- Wayfield
- Shirley Avenue
- Walderslade Village
- Kestral Road
- Admirals Walk
- Silverweed Road

Local employment opportunities will be encouraged, including through reinvestment in established employment areas.

Figure 10-5 Chatham Context Diagram



Gillingham

- 10.47 The Gillingham sub area extends from Gillingham Waterfront through the town centre to Darland and the Capstone Valley beyond. The northern part of the area is characterised by a generally very tight street pattern with pre-1919 terraced properties. These give way to post war and modern suburban developments further south. The town centre is by far the most densely populated in Medway and this and surrounding areas have significant pockets of deprivation. The area also contains the Medway Maritime hospital and Gillingham Business Park.
- 10.48 Gillingham town centre once rivalled Chatham in importance but in recent years has consolidated into a district level centre serving a compact but dense catchment area.
- 10.49 The area has seen much change over the last few years, notably the establishment of the universities at Pembroke, the development of the new Mid Kent College campus at Prince Arthur Road, the Medway Park regional sports facility and new parks at the Lower Lines, Great Lines and Hillyfields. The growing student population in particular presents opportunities for the future and for the town centre to re-position itself.
- 10.50 A Gillingham Town Centre Development Framework was adopted in 2007. It contains a number of measures to revitalise the centre, including:
- Development of a key retail site in a central location for a new food supermarket, retail, employment and residential uses as well as significant new public car parking provision
 - Creation of a series of linked spaces along the High Street to break up its length and make it easier for pedestrians to cross busy junctions
 - Improved connections to wider initiatives such as Medway Park, the Universities and the Great Lines Heritage Park
 - Promoting Gillingham Hub as a landmark cultural/entertainment building at the western end of the High Street;
 - Encouraging regeneration of the railway station and improve public space and reduce traffic conflicts outside the station
 - Improve links to adjoining residential areas
 - Provide a new town square at the junction of High Street and Green Street as a focal point for events and a meeting place/destination; and
 - Introduce more flexible land uses at the western end of the High Street, with opportunities for residential uses on upper floors and a wider range of food, drink and leisure uses.
- 10.51 These should continue to be pursued over the medium and longer terms. Significant improvements to the Station are in hand but other measures will take longer to realise.
- 10.52 Beyond the centre a range of local centres provide a number of services. Some have consolidated in recent years but others are adapting well to an ever more competitive environment. These are listed in Policy CS29.

- 10.53 Elsewhere the Strand Leisure Park and Gillingham Park are highly valued facilities and have significant potential for improvement. However this will be largely dependant on resources being available. The Capstone Valley and associated Darland Banks and Spekes Bottom provide a striking landscape adjoining very extensive and densely populated residential neighbourhoods. This area also forms part of the setting for the Kent Downs AONB. It will therefore be important to maintain and, where possible, enhance its open character, landscape quality and recreational potential.
- 10.54 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

Table 10-10 Potential Housing Development in Gillingham

Gillingham Housing Sites		
SLAA Ref	Site Name	Capacity
0511	Victory Pier, Pier Road (formerly Akzo Nobel), Gillingham	776
0875	Retail Core (High St, Jeffrey St, King St) Gillingham	100
	Main Sites	876
	Other Sites	487
	Housing Total	1,363

Table 10-11 Potential Employment Development in Gillingham

Gillingham Employment Sites		
SLAA Ref	Site Name	Capacity
0564	Land off Bailey Drive (Adjacent to Royal Mail to the east)	12,169
0875	Retail Core (High St, Jeffrey St, King St)	4,750
	Main developments	16,919
	Other sites	-1480
	Employment floorspace total (sq m)	15,439

Table 10-12 Potential Retail Development in Gillingham

Gillingham Retail Sites		
SLAA Ref	Site Name	Capacity
0875	Retail Core (High St, Jeffrey St, King St)	3,750
	Main developments	3,750
	Other sites	961
	Retail floorspace total (sq m)	4,711

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS29: Gillingham

In Gillingham Town Centre, priority will be given to the improvement of the built fabric and public realm through the development of a mix of town centre uses, the provision of open space and the promotion of the evening economy, in accordance with the Town Centre Development Framework, in order to strengthen its role as a district centre.

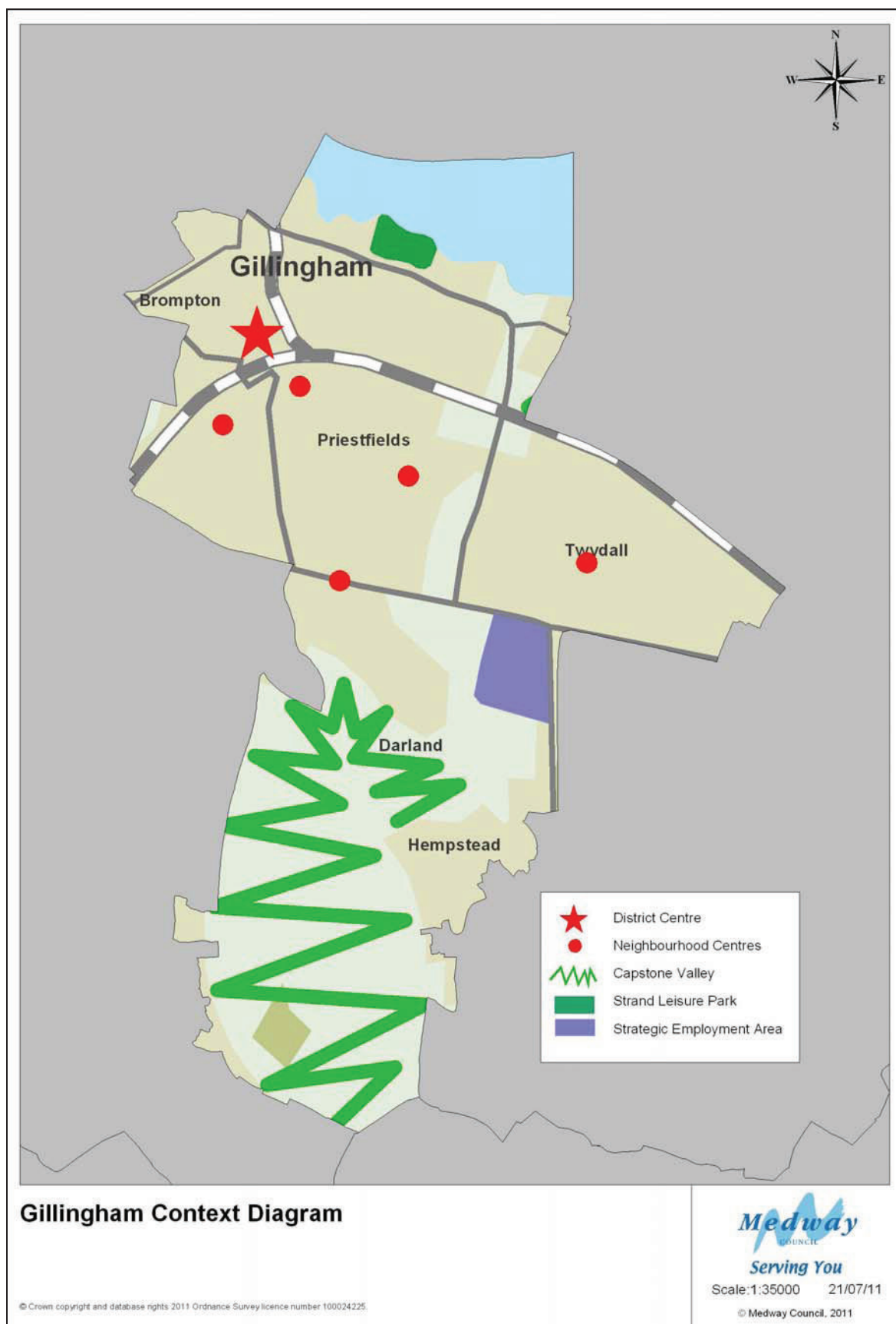
Specific efforts will be made to capitalise on the proximity of the universities at Pembroke and Mid Kent College and to continue measures to reduce deprivation.

The following local centres will be safeguarded and promoted as neighbourhood centres:

- Canterbury Street
- Livingstone Circus
- Sturdee Avenue
- Watling Street
- Twydall Green

Where available, opportunities will be pursued to enhance the recreational potential of the Strand Leisure Park. The Capstone Valley will be afforded long term protection from built development, reflecting its high quality landscape and contribution to the setting of the Kent Downs AONB.

Figure 10-6 Gillingham Context Diagram



Rainham

- 10.55 The Rainham sub area runs from the Riverside Country Park and Motney Hill Peninsula through the town centre and on to the Borough boundary south of the M2.
- 10.56 Rainham is a generally prosperous area characterised by extensive neighbourhoods developed in the post war period. These include Rainham Mark, Parkwood and Hempstead and Wigmore. The town centre was a freestanding village in living memory but has now been surrounded on all sides by development.
- 10.57 Important remnant areas of the North Kent Horticultural Fruit Belt remain to the north and east of the town and land next to the estuary is an important country park. These areas experience classic urban fringe pressures with land fragmentation and trespass putting pressure on farming activity.
- 10.58 There are pockets of deprivation close to the town centre, contrasting strongly with the very prosperous southern neighbourhoods.
- 10.59 Rainham station is one of the busiest commuter stops in the region, while large numbers of London commuters also use daily coach services to the capital from the neighbourhoods closer to the M2.
- 10.60 The town centre is dominated by the 'Precinct' a 1980's pedestrianised shopping centre that is trading reasonably well but warrants reinvestment. A key feature recently has been the growth of the evening economy, which has diversified the centre and brought vacant properties back into use.
- 10.61 The catchment area of the centre overlaps with that of the Hempstead Valley Shopping Centre. This is a very successful purpose built centre, wholly occupied by national multiple retailers and providing an attractive alternative to not only Rainham but also Gillingham and Chatham town centres.
- 10.62 Local centres are well located to serve their residential neighbourhoods but are, in some cases, struggling to compete with the nearby larger centres. This is particularly the case with Parkwood Green but it still provides a diverse range of services to its local area and it is important that it is nurtured.
- 10.63 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables. The low housing numbers reflect the built up nature of the area and absence of previously developed land.

Table 10-13 Potential Housing Development in Rainham

Rainham Housing Sites		
SLAA Ref	Site Name	Capacity
	Main Development	0
	Other Sites	112
	Housing Total	112

Table 10-14 Potential Employment Development in Rainham

Rainham Employment Sites		
SLAA Ref	Site Name	Capacity
0655	Land south of Kent Terrace Canterbury Lane Rainham	2,350
0690	Crest Packaging Site Courteney Road	9,750
	Main developments	12,100
	Other sites	-99
	Employment floorspace total (sq.m)	12,001

Table 10-15 Potential Retail Development in Rainham

Rainham Retail Sites		
SLAA Ref	Site Name	Capacity
0691*	Hempstead Valley Shopping Centre	9,730
	Main developments	9,730
	Other sites	493
	Employment floorspace total (sq.m)	10,223

* Hempstead Valley Shopping Centre sites have been combined under one entry

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS30: Rainham

Rainham town centre will continue to function as an important 'district' level centre and reinvestment in and extensions to the 'Precinct' centre will be encouraged.

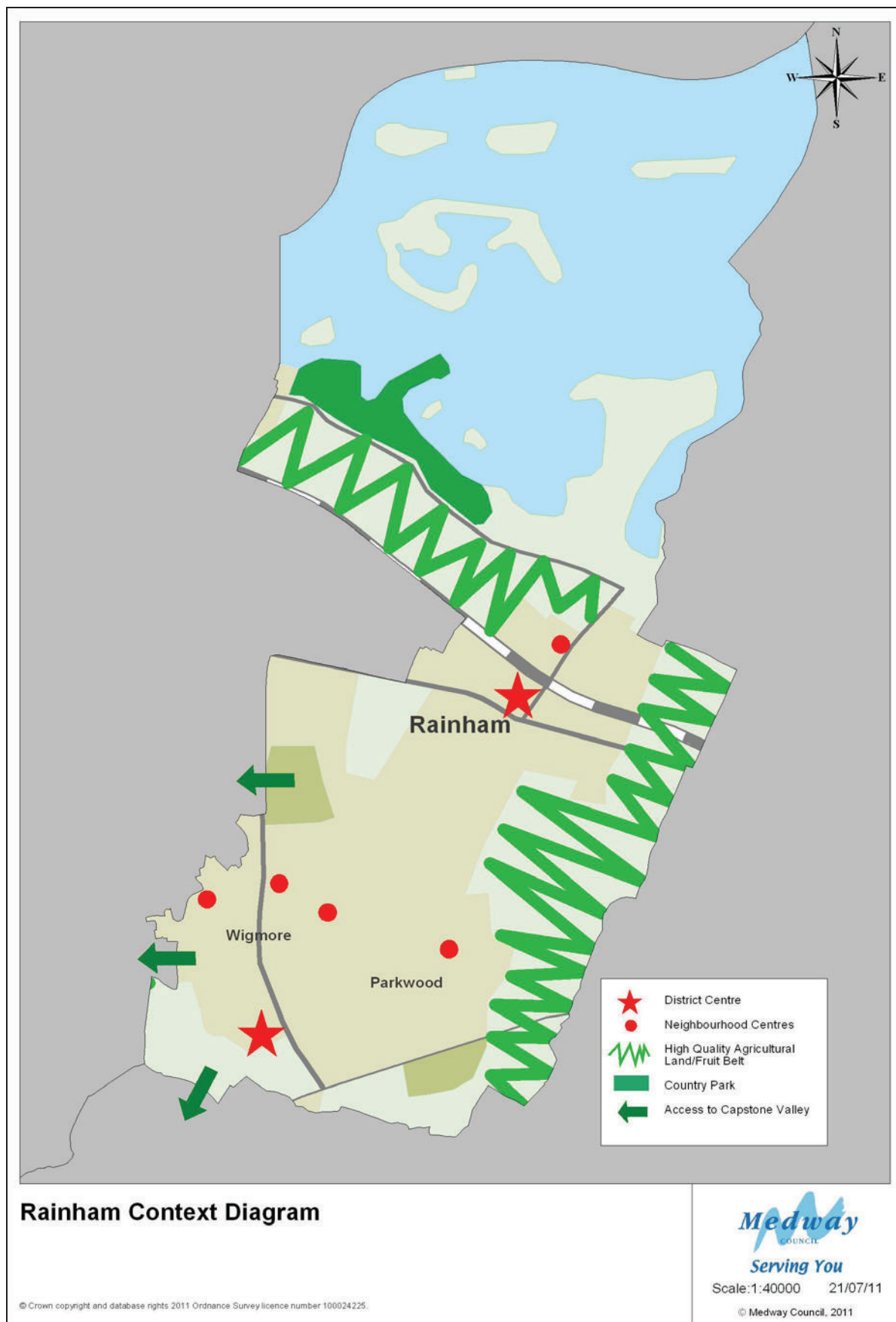
Hempstead Valley Shopping Centre is also classified as a 'district' level centre. New retail investment should focus on maintaining the current competitive position of the centre and not be of a scale that would divert investment from other centres and Chatham in particular. Opportunities to diversify the mainly comparison based shopping offer and provide a wider range of non-retail services typical of a district centre will be encouraged.

The following local centres will be safeguarded and promoted as neighbourhood centres:

- Station Road
- Hoath Lane
- Fairview Avenue
- Hempstead Road
- Parkwood Green

The Council will work with landowners and farmers, the local community and relevant agencies to actively manage urban/rural fringe areas, balancing continued agriculture production with managed public access, open space and biodiversity.

Figure 10-7 Rainham Context Diagram



Hoo Peninsula and Isle of Grain

- 10.64 The Hoo Peninsula makes up the largest part of Medway's extensive rural area. Located between the Thames and Medway estuaries, it has a distinctive character that strongly distinguishes it from other parts of Medway.
- 10.65 The area's character is defined by a sense of remoteness, the openness of the internationally important marshes, and surrounding estuaries, and the wooded ridge running from the south west, contrasted with the dominant industrial installations at Grain and Kingsnorth, and the pattern of villages around the main transport routes. The peninsula's historic environment has been shaped by centuries of industrial activity, and its strategic position on the confluence of the Thames and Medway has given it a significant military heritage.
- 10.66 The area has strategic importance for energy infrastructure, transport and minerals, and also has large tracts of land in use by the military. These activities have strong impacts on the surrounding countryside and villages, resulting from their dominance in the landscape, traffic levels, and particularly freight movements on rural roads.
- 10.67 The area offers potential for managing adaptations to climate change, such as flood water storage and increases in woodland. The north and east of the peninsula could offer sites for new wetland habitat creation in response to the Thames Estuary 2100 plan. There are a number of barriers in accessing the countryside but there is recognition that the area could offer a great open space resource for local people and visitors through appropriate management. An access management strategy, promoting strategic connections and local routes will be developed for the area, ensuring that visitor pressure is drawn away from the most sensitive sites.
- 10.68 There is a distinct rural character to the Hoo Peninsula, with a dispersed pattern of villages. Historically remote from the main centres of population across north Kent, the area's population expanded significantly from the 1960s with the development of the energy sector on the peninsula. The largest settlement of Hoo St Werburgh acts as a service centre for the surrounding rural communities but has a relatively limited range of facilities.
- 10.69 The villages face the pressures of sustaining services and facilities needed to underpin the quality of life for their residents and surrounding countryside. These pressures present a challenge to the retention of the distinctive characteristics of rural life. The peninsula villages vary significantly in size and character, and some are particularly vulnerable to loss of services, that could undermine their sustainability. Rural transport services are critical in preventing isolation. Many villages experienced expansion during the 1960's and 70's and this has detracted from their intrinsic character. In the case of Hoo St. Werburgh and High Halstow expansion has continued to the present day but has not necessarily knitted well into the settlement structure. There are opportunities to promote local landscape enhancements to the peninsula villages. Particularly their edges and the roads connecting them, to better reflect the rural setting.
- 10.70 Agriculture is a key land use on the Hoo Peninsula and the area contains a significant proportion of the highest quality agricultural land. Horticultural

production is on a significant scale, serving markets nationally. In addition to the large industrial sites at Kingsnorth, Grain and Hoo Marina, there are a number of smaller employment sites across the area, providing local employment opportunities.

- 10.71 The area faces change through expansion of industrial activities, the proposed new settlement at Lodge Hill, increasing visitor numbers, and pressures on the sensitive natural environment, including through climate change. The peninsula has also experienced ongoing threats of damaging development, such as proposals for a Thames Estuary airport.
- 10.72 The overarching issue for the Peninsula is the challenge of realising the strategic importance of the area, in line with the protection and enhancement of a sensitive and important natural environment and safeguarding a vibrant and distinctive character of rural life. In summary the Peninsula is an area of exceptional significance for a number of diverse land uses – its energy and transport infrastructure are of national importance, its natural environment is of international importance for wildlife, and its agricultural land is of the highest quality for food production. It contains the largest sites in Medway allocated for residential and employment growth.
- 10.73 These unique circumstances and opportunities demand that development on the peninsula is considered with the utmost sensitivity.
- 10.74 In line with wider national trends, there are increasing pressures on village services and facilities, such as shops, post offices, health facilities, pubs and village halls. Many services have been lost, and much community infrastructure is in need of investment. These services together with good public transport are essential to the well-being of the communities. The provision of broadband is recognised as critical infrastructure to support businesses and communities, and existing services are poor in many parts of the peninsula. The council will support rural communities in developing village or neighbourhood plans to address the needs of their local areas.
- 10.75 Hoo St Werburgh provides a range of services and facilities, such as retail, education, community services and leisure that are not found in the smaller villages. The development of Lodge Hill creates both an opportunity to enhance the services and facilities on the peninsula and a challenge to Hoo's current role. The impact of Lodge Hill on Hoo St Werburgh and the surrounding villages will need to be carefully managed so that existing services and facilities are not undermined. Enhanced rural transport links will be critical to ensuring that people from outlying villages can take advantage of new services at Lodge Hill, including the expanded bus services operating from the new settlement.
- 10.76 The environment of the Hoo Peninsula has gained a higher profile in recent years, through initiatives such as the Thames Gateway Parklands programme. These plans seek to develop a greater role for the Peninsula as a location for visitors to enjoy, particularly through walking and cycling. This will be achieved through the development of key visitor destinations, such as the RSPB reserves at Cliffe Pools and Northward Hill, Upnor Waterfront and Grain Coastal Park, together with improvements to the footpath and cycling networks.

- 10.77 The area to the south-west of the peninsula, between Frindsbury, Upnor and Chattenden, is of significant importance as a 'gateway to the peninsula'. It is the key interface between urban Medway and the rural area of the peninsula. It is an area noted for the richness of its heritage and environment, with Manor Barn, Upnor Castle and Depot, Medway waterfront, and neighbouring woodland. This area needs to be actively managed for landscape enhancements to retain its open setting and to promote improved access for pedestrians and cyclists between urban and rural Medway.
- 10.78 Agriculture is facing a number of changes and there is recognition that businesses may need to diversify or develop more efficient methods of production but this needs to be achieved in a sensitive way.
- 10.79 Villages need local employment to support the life and vibrancy of their communities. Small employment sites are part of the fabric of villages, and these need to be encouraged.
- 10.80 There are extensive residential home parks at Allhallows and Hoo Marina that provide for an important niche within the wider housing market.
- 10.81 Allhallows also has an extensive holiday park and the operator has identified significant opportunities to upgrade the facilities and increase visitor numbers. This, in turn, could put pressure on the surrounding countryside but could also be an opportunity to improve the wider leisure experience for park visitors and others.
- 10.82 Over the plan period, the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

Table 10-16 Potential Housing Development on Hoo Peninsula

Hoo Peninsula and Isle of Grain Housing Sites		
SLAA Ref	Site Name	Capacity
0050	Lodge Hill (Chattenden) Ministry of Defence Estate	5000
0520	Hoo - North East Bells Lane Hoo	158
	Main Sites	5,158
	Other Sites	78
	Housing Total	5,236

Table 10-17 Potential Employment Development on Hoo Peninsula

Hoo Peninsula and Isle of Grain Employment Sites		
SLAA Ref	Site Name	Capacity
0050	Lodge Hill (Chattenden) Ministry of Defence Estate	44,100
0699	National Grid Property Holdings Grain Road	464,750
0730	Land north east of Kingsnorth Industrial Estate Eschol Road	250,992
0952	Land adjacent to Bellwood Cottages Ratcliffe Highway	4,655

	Main Sites	764,497
	Other Sites	1,422
	Employment floorspace total (sq. m)	765,919

Table 10-18 Potential Retail Development on Hoo Peninsula

Hoo Peninsula and Isle of Grain Retail Sites		
SLAA Ref	Site Name	Capacity
0050	Lodge Hill (Chattenden) Ministry of Defence Estate	5,315
0699	National Grid Property Holdings Grain Road	180
	Main Development	5,495
	Other Sites	189
	Retail floorspace total (sq. m)	5,684

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS31: Hoo Peninsula and the Isle of Grain

The Council will seek to achieve the potential of the peninsula's strategic development sites, in line with the protection and enhancement of its important natural environment.

The Council will work to secure the viability of the rural communities on the Hoo Peninsula and Isle of Grain by supporting the retention and development of local services and facilities needed to sustain village life and reduce the need to travel. It will work with local communities to prepare and implement village plans and other initiatives in order that they can become more self-supporting and can respond to local needs and changing circumstances.

This applies to the following settlements:

- Hoo St Werburgh
- Lower Upnor
- Upper Upnor
- Cliffe
- Cliffe Woods
- Chattenden
- Cooling
- High Halstow
- St Mary Hoo
- Lower Stoke
- Stoke
- Allhallows
- Grain

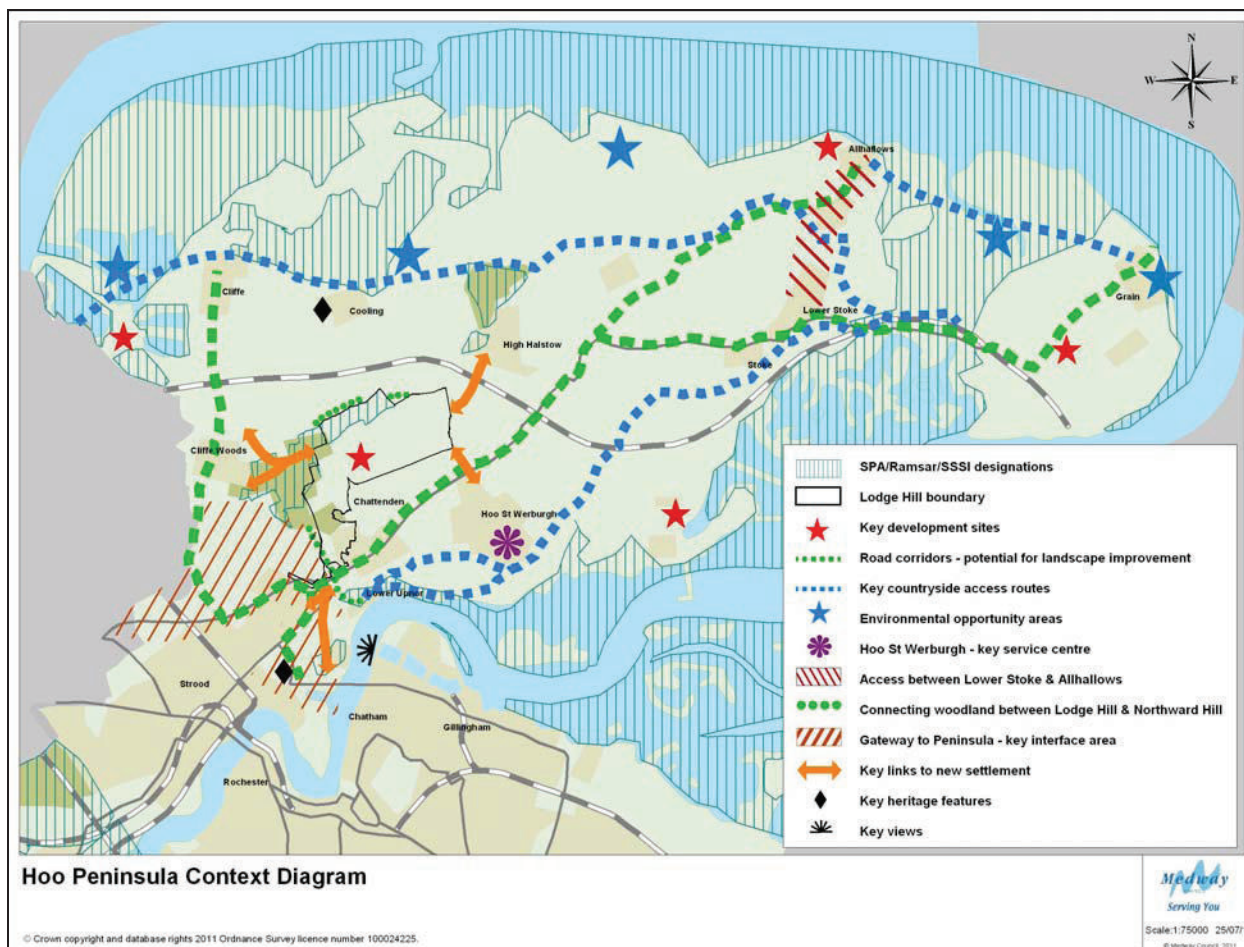
The Council will seek to realise the potential of the Peninsula as a destination for walking and cycling by safeguarding and promoting key access routes, such as the national coastal path, supporting the development of key sites for visitors and developing improved

connections through the Medway Green Grid.

Improvements to the Allhallows holiday park will be supported provided they complement the adjoining settlement and contribute effectively to the sustainable management of the surrounding countryside.

The Council will support the development of a strong economy to sustain local communities and retain the distinctive character of the countryside.

Figure 10-8 Hoo Peninsula Context Diagram



Medway Valley

- 10.83 This rural area covers the Medway Valley and Kent Downs to the south of the M2 and to the east and west of the River Medway. It is characterised by riverside villages set against the backdrop of the woods and grasslands of the Downs and is strongly marked by the transport corridors of the M2 and A228 and the river cutting through the area.
- 10.84 Its downland landscape and the barrier created by the M2 give it a different character to other parts of Medway. Land to the east of the river is particularly isolated.
- 10.85 Much of this area is set within the Kent Downs Area of Outstanding Natural Beauty. On the western side running along the Medway Valley, a prominent transport and development corridor reflecting former industrial uses, contrasts with the upper scarp slopes and wooded ridge of the Kent Downs. To the east of the river, a more open landscape, less damaged by infrastructure, affords generous views. The valley sides, wooded ridges, marshland and river all contribute to a strong sense of visual richness and local distinctiveness.
- 10.86 The area is 'sandwiched' between the M2 and the M20. Transport infrastructure within and adjacent to the area has a significant impact on the landscape and setting of the villages and countryside. The road network will be further extended through a planned bridge over the Medway linking Halling and Wouldham, serving a new development at Peters Pit in Tonbridge and Malling.
- 10.87 There is a strong historic environment, and a legacy of settlement across the centuries from the Neolithic period. The valley villages grew up through their links to the river and saw expansion with the development of the cement industry in the 19th Century. Most of the cement industry has gone but it has defined much of the local landscape, with chalk cuttings and pits, and the 'blue lake' at Halling.
- 10.88 The villages of Cuxton and Lower Halling offer a range of local services and facilities well related to their size. These villages are also connected to the Medway Valley rail line linking Strood, Maidstone and Paddock Wood. Many residents look outside of Medway, particularly to the Tonbridge and Malling and Maidstone areas to access services, such as education and retail. There are local employment sites at Cuxton Marina and in Halling, and farming and forestry are significant. There is scope for limited consolidation of employment land at Cuxton Marina, but only where development realises the opportunity to deliver improvements to the landscape setting of this sensitive area.
- 10.89 Much of the land is Metropolitan Green Belt. The Medway Valley also forms part of an area where it is intended to prevent coalescence between Medway and the Maidstone/Tonbridge and Malling area and maintain the character of the various settlements in between.
- 10.90 The closure of the Cemex plant at Halling is a key site and will accommodate a significant new employment and residential development. It is more than sufficient to meet local requirements and so can also contribute to meeting needs in the surrounding area. It has a particularly important role in providing replacement employment for that lost when the cement works closed. The

amount of land available is such that it will significantly extend the settlement and redefine how services are provided and located. The new development will need to demonstrate sensitive design and knit into the existing development form of the wider village.

- 10.91 Until recently the area has been somewhere to travel through rather than it being a destination in its own right. However that is now changing as the rugged industrial legacy softens and new countryside initiatives improve appreciation of its exceptionally high intrinsic quality.
- 10.92 Recognition of the area's environmental assets, together and promotion of the objectives of the AONB, underline the need for positive management of this sensitive landscape. This will need to focus on strengthening its distinctive character, enhancing connections to the river and wider countryside and improving access from neighbouring urban areas. Work is already well underway through the Valley of Visions programme, and work at Ranscombe Farm and Nashenden Valley. The Valley of Visions programme focuses on improving access, enhancing the quality of the environment and engaging with local communities in sharing the area's heritage.
- 10.93 The Medway Valley is of key importance to strategic green infrastructure networks across north Kent, through its strong connections to adjoining districts. The North Downs Way and the surrounding footpath network provide links to Cobham, Shorne and more widely to the south. Although the area sits within the valley of the Medway, access and views to the river are limited. There is a strong interest in giving greater emphasis to the river. A feasibility study for the creation of a path running along the riverside connecting Medway and Maidstone has been produced by Sustrans to support plans to develop this strategic route.
- 10.94 The special character of the area requires sensitive treatment. This includes road corridors, the marked impact of the M2, improved links to the river and the links to Strood. Halling Marshes should also be developed as a key site for wetland management and improved access.
- 10.95 In line with wider national trends, there are increasing pressures on village services and facilities, such as shops, pubs and village halls but new developments have helped sustain a good range of services in Cuxton and Lower Halling.
- 10.96 Despite this there is need for further investment to ensure that the rural communities are able to continue to meet local needs. Cuxton has a specific issue with the provision of community hall facilities. The council will support local communities in assessing the needs of their village and sustaining services.
- 10.97 Agriculture and woodland are significant land uses in the area but there is a need to improve woodland management in some areas.
- 10.98 Over the plan period, the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

Table 10-19 Potential Housing Development in Medway Valley

Medway Valley Housing Sites		
SLAA Ref	Site Name	Capacity
0352	Former Cement works, Formby Road, Halling	525
	Other Sites	23
	Housing Total	548

Table 10-20 Potential Employment Development in Medway Valley

Medway Valley Employment Sites		
SLAA Ref	Site Name	Capacity
0352	Former Cement works, Formby Road, Halling	3000
	Other Sites	660
	Employment floorspace total (sq. m)	3660

Table 10-21 Potential Retail Development in Medway Valley

Medway Valley Retail Sites		
SLAA Ref	Site Name	Capacity
	Main Development	0
	Other Sites	700
	Retail floorspace total (sq. m)	700

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS32: Medway Valley

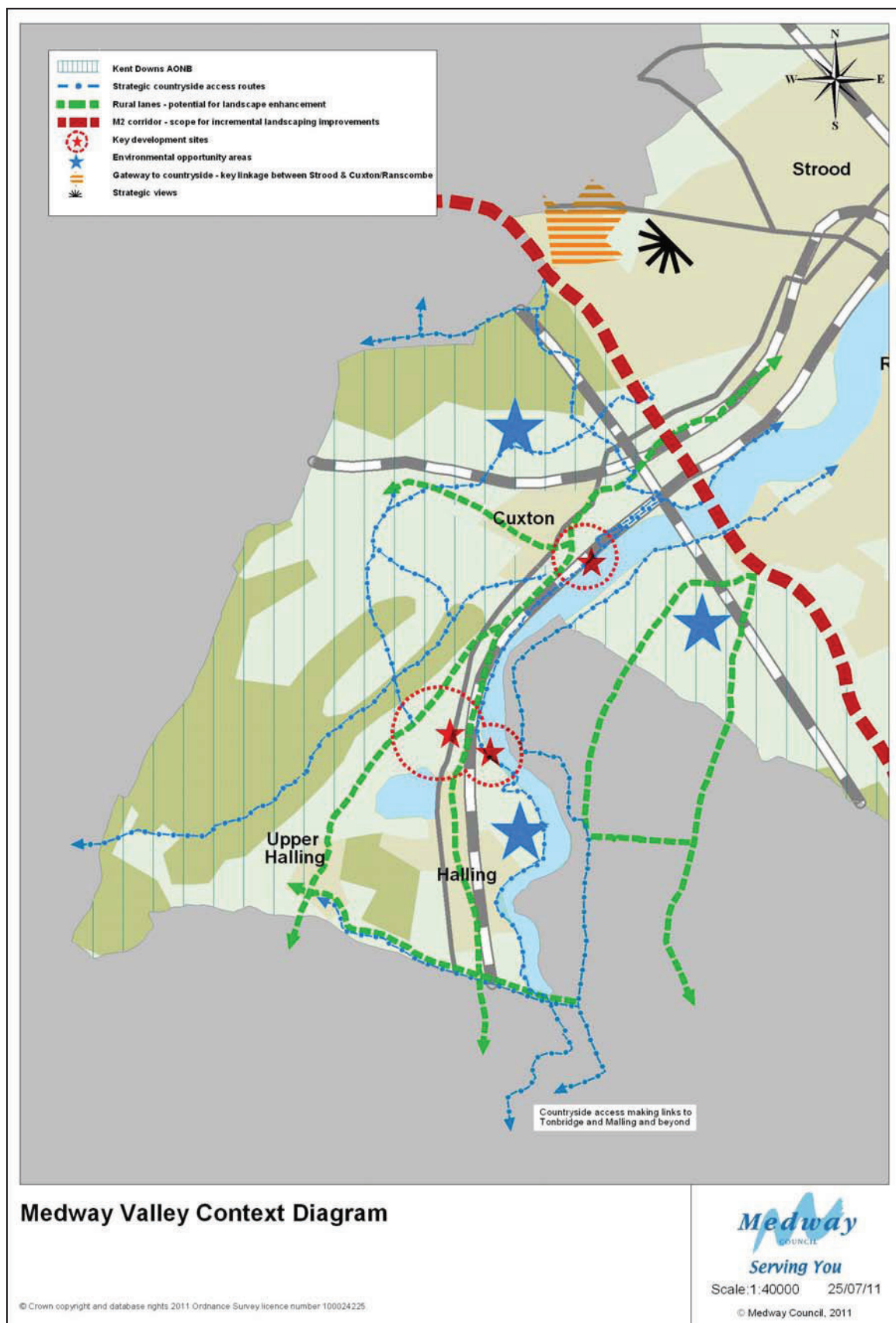
The focus on green infrastructure planning in the Cobham-Shorne-Ranscombe area will be maintained and developed to improve access to and management of the high quality environment.

Cycling and pedestrian routes connecting to adjacent areas will be promoted, including the strategic connection between Medway and Maidstone. Opportunities for landscape enhancement in line with the objectives of the Kent Downs AONB designation will be encouraged.

The Council will support the retention and development of local services and facilities in Cuxton, Lower Halling and Upper Halling and encourage local communities to plan for the needs of their villages.

The Council will support a strong economy in the Medway Valley to sustain local communities. The site of the former cement plant at Lower Halling should be a major contributor to this. The land-based economy will be supported through more active woodland management and the sympathetic diversification of agriculture.

Figure 10-9 Medway Valley Context Diagram



Lodge Hill

- 10.99 Lodge Hill, Chattenden has been identified as a location for a new freestanding settlement since 1995 when the Thames Gateway Planning Framework was published. The principle of development has been consistently restated and reconfirmed in all plans since then.
- 10.100 The site is currently owned by the Ministry of Defence and comprises the Lodge Hill Training Area, Lodge Hill Camp, Chattenden Barracks and the Chattenden Training Area. The site extends to around 320 hectares in total, of which around 256 hectares is considered to be developable. A significant proportion of this can be classed as previously developed land. The site excludes further land in the Ministry's ownership, including the Wainscott Training Area and Camp, which will remain in military use.
- 10.101 Much of the site is set between the Chattenden and Deangate ridges and is largely hidden within the landscape of the Hoo Peninsula. However there are also exceptional views from these ridges and the adjoining rich woodland and countryside creates an outstanding setting for the development area.
- 10.102 Due to its location close to the A228 and its proximity to existing villages on the Peninsula, the development of Lodge Hill provides an opportunity to enhance the range of services available locally. However, it must also respect the character of nearby settlements and the wider Peninsula. Its position between the main urban area and the major employment areas on the Peninsula is a major asset in establishing Lodge Hill as a new centre for employment growth.

Figure 10-10 Lodge Hill Connections



10.103 The site's physical constraints are recognised and understood. Detailed investigations have been undertaken which demonstrate that they can be appropriately addressed to allow the majority of the site to be developed over the period covered by the Core Strategy. There has been extensive engagement with local communities. This will need to continue throughout the planning phase of the new settlement, leading up to the submission of planning application(s) for the redevelopment of the site. The new community as it grows will also need to be involved as the development evolves.

10.104 There is no comparable opportunity in the Thames Gateway for a new settlement of this scale and nature on previously developed land and it is important that every effort is made to create a settlement that meets high standards of design and sustainability while relating sensitively to its exceptional surroundings. The following vision reflects this:

Lodge Hill will be a sustainable and integrated community, capitalising on its exceptional setting, complementing and supporting nearby settlements and the Hoo Peninsula as a whole.

It will be a distinctive place that connects to the surrounding rich countryside, with a land use pattern that minimises the need to travel. It will be an exemplar for the Thames Gateway in the way that it minimises its impact on the environment and provides for an excellent quality of life for all its residents.

It will also become an important focus for higher value economic activities, taking advantage of its location between urban Medway and the existing and emerging industries at Grain and Kingsnorth.

It will be a resilient place that is capable of adapting to environmental, social and other changes over the long term.

10.105 In delivering this vision the following principles will guide all planning and development decisions:

- *Strong character* – making the most of the natural landscape and military heritage to create a distinctive and attractive place with a strong identity and a legible hierarchy of spaces and places.
- *Active community* – a diverse, inclusive, vibrant and creative local culture encouraging pride in the local community and achieving a sense of mutual support and well being
- *Environmentally sensitive* – design, infrastructure, delivery and management that respect and enhance the natural environment, ensure protection of nearby internationally and nationally designated sites, conserve natural resources and support people to lead sustainable lifestyles
- *Well connected* – bringing people together and to jobs, schools and services in an efficient, safe, affordable and uplifting way, both within the new settlement and between Lodge Hill and surrounding communities
- *Thriving economy* – achieving a high quality, prestigious employment offer, unique to Medway and complementary to Medway's economic

vision. Prosperous and diverse, Lodge Hill's economy will provide a range of training, employment and business opportunities

- *Well served* – allowing the community within Lodge Hill and beyond to benefit from public, private and voluntary services that are accessible to all and meet people's needs and aspirations
- *Well run* – effective engagement and participation by local people, groups and businesses in the planning, design and delivery of Lodge Hill, with a sustainable management model and effective leadership, governance and participation of the community in the long-term stewardship of Lodge Hill.

10.106 In this Core Strategy, Lodge Hill is categorised as a 'strategic allocation', which is defined on the Proposals Map. Policy CS33 below will be expanded on by a site-specific Development Brief and a masterplan for the site, which will guide detailed planning decisions. The masterplan will be subject to regular reviews to ensure that proposals for the site remain robust in the face of changing circumstances.

Policy CS33: Lodge Hill

Lodge Hill, as shown on the Proposals Map, will be developed as a freestanding mixed-use settlement providing:

- **Approximately 5,000 new homes, of which around 4,300 will be completed within the plan period. Provision of 30% affordable housing within this total will be sought, in line with the provisions of Policy CS14**
- **Employment opportunities generally in balance with the resident working age population (c. 5,000), not only reflecting the needs of the settlement but creating a new focus for higher value economic activity in Medway**
- **Retail provision of at least 5,000 square metres GEA floorspace.**

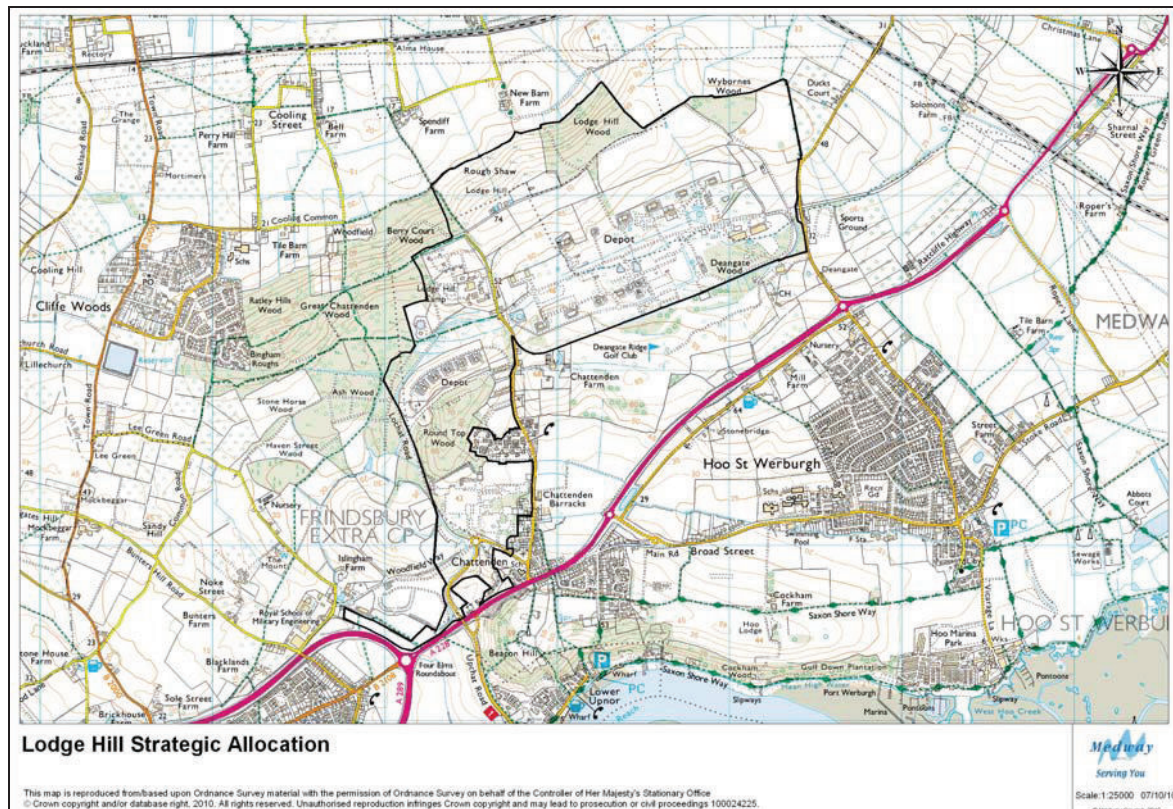
Planning permissions will be granted subject to:

Being consistent with a Development Brief and site-wide masterplan. These should fully reflect the Vision and Objectives for the site as set out above and be in accordance with the design principles and parameters illustrated on the Lodge Hill Concept Plan

- **The provision of supporting infrastructure, including transport links, utilities, green infrastructure and community facilities**
- **Mitigation for any detrimental impact on protected species within the site and internationally and nationally designated ecological sites nearby.**
- **Design solutions having due regard to:**
 - **The military history and heritage of the site**
 - **The proximity of the Chattenden Woods Site of Special Scientific Interest, including the need for appropriate buffers and management arrangements**
 - **The provision of open space and other community facilities**
 - **The benefits of retaining existing trees, hedgerows and other landscape features within the site**

- Measures to protect and enhance biodiversity within the locality, including improvements to ecological connectivity
- The potential for a comprehensive heating grid, neighbourhood power and heat generation, SUDs and other features minimising the carbon footprint of the development as a whole, including a water strategy
- The need to create a well defined 'town centre' and associated neighbourhood centres serving not only the needs of the resident and working community, but also existing smaller settlements on the Hoo Peninsula, and in particular the existing settlement of Chattenden
- The need to create liveable neighbourhoods where the built form, mix of uses and layout of development enables future residents to achieve a good quality of life and encourages healthy and active lifestyles
- The requirements of a comprehensive Access Strategy and associated Transport Assessments, to be phased in accordance with the demands generated by the development, including:
 - Accesses at the eastern and southern ends of the site
 - Contributions to offsite highway and junction improvements directly related to the scale and phasing of the development
 - Early provision of a high quality bus service including priority measures on the highway network, or other comparable public transport facilities connecting the settlement to the main Medway urban area
 - Measures to actively promote sustainable transport, including public transport use, walking and cycling
 - Measures to minimise rat-running on the surrounding rural road network while promoting connectivity for pedestrians and cyclists

Figure 10-11 Lodge Hill Strategic Allocation



Implementation

10.107 Given the scale of the development the precise mix and quantum of uses is likely to vary over time due to, for example, changing technology and market trends. The following broad land use mix is anticipated:

Table 10-22 Proposed Land Uses at Lodge Hill

Housing	Capacity for approximately 5,000 residential dwellings (of which approximately 4,300 to be delivered within the plan period), and with 30% affordable housing. This will include retirement accommodation.
Economic development	
- Retail	At least 5,000 square metres GEA, to include a foodstore
- Employment	At least 43,000 square metres sq m GEA for business uses
- Hotel	Two hotels
Community	Three primary schools (which may include an extension to the existing Chattenden Primary School) and a secondary school. All schools will include dual community use.

	Community centre incorporating uses such as place of worship; emergency service accommodation; library Primary Healthcare Centre <i>The land take for social infrastructure is expected to be approximately 6.5 hectares</i>
Residential institutions	Assisted living and/or extra care accommodation (approximately 60 units) Nursing home accommodation (approximately 60 units)
Leisure	A range of facilities to be provided throughout the site through the provision of open space and through dual use with community and education provision
Landscape and open space	Throughout the site <i>The land take for green infrastructure is expected to be approximately 90 hectares</i>

10.108 The amount of development expected within the Core Strategy period has been calculated based on anticipated market absorption rates for residential dwellings on an annual basis, and an allowance for the provision of affordable residential dwellings. Market absorption rates are based on an analysis of the following:

- The expected size and tenure mix of the residential accommodation anticipated
- The simultaneous marketing of multiple development opportunities to different developers
- The response of the housebuilder industry to predicted changes in industry and economic circumstances; and
- The appeal of Lodge Hill in the short, medium and long term in a local, regional and national context.

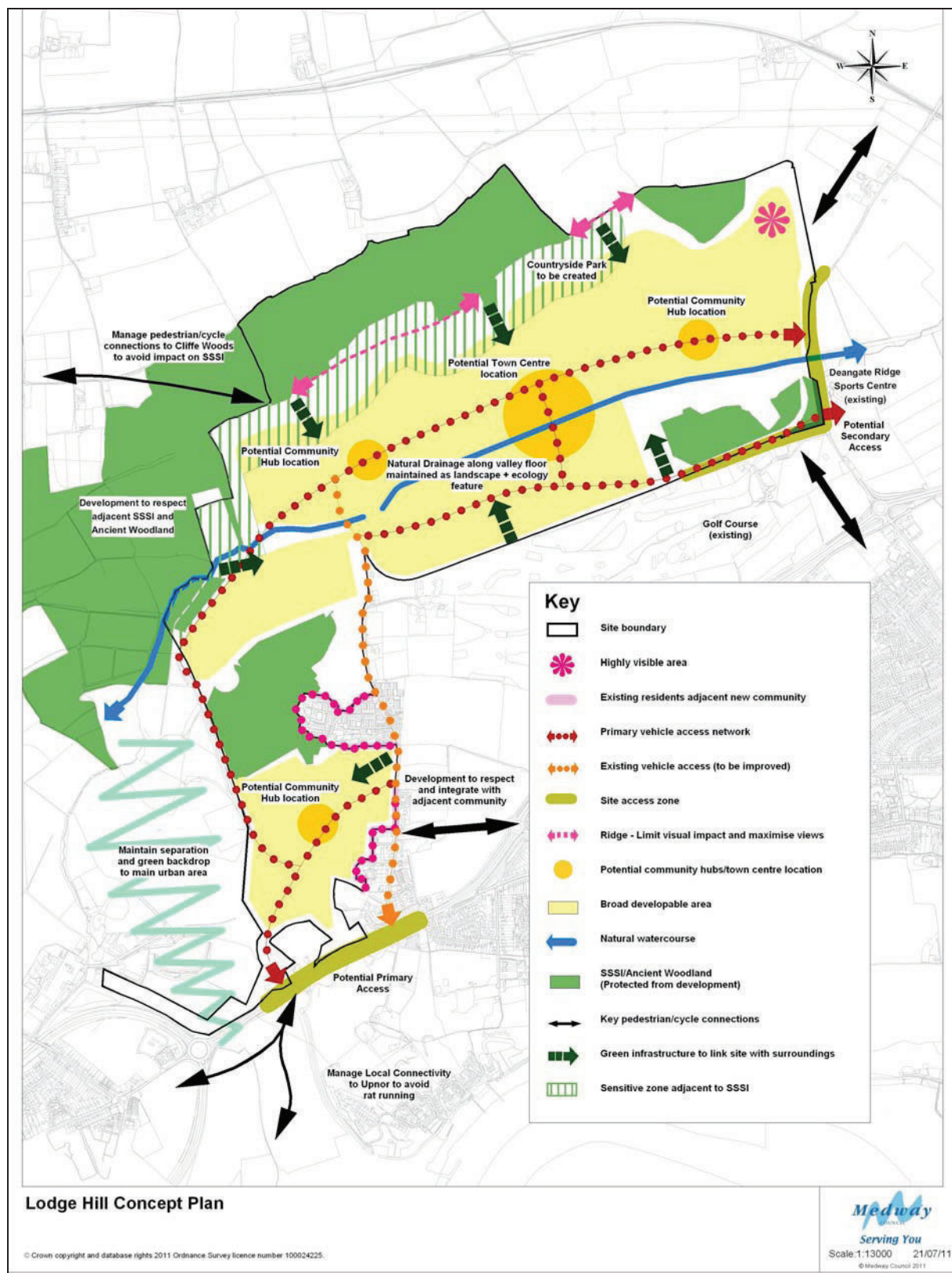
10.109 It is expected that the first residential dwellings would be delivered in 2014. The annual delivery rate of dwellings will step up from the start on site and will fluctuate across the period. It should reach an average of around 300 dwellings (all tenures). This is reflected within the housing trajectory. Lodge Hill is expected to contribute approximately 1,000 dwellings within the first five years after the Core Strategy's adoption.

10.110 In terms of the delivery of economic growth and employment opportunities, there will be a range of employment opportunities across the uses proposed, including business premises, shops and leisure, hotels and public services. As part of the objective of creating sustainable economic growth, the development of the new settlement should also explore opportunities to facilitate new working practices such as live/work and local communications and technology hubs.

10.111 The policy is based on the delivery of a minimum of 43,000 square metres of dedicated space for business uses, which reflects the fact that it will take a certain amount of time to establish Lodge Hill as a high quality business location. However, there is capacity to accommodate significantly more employment floorspace if its full potential is realised. The policy incorporates an ambition for a higher level of provision.

- 10.112 The development is expected to be delivered in phases. There may be strategic infrastructure that will be delivered ahead of the phased sequence. This will assist the delivery of future phases and may also help in meeting some of the objectives for the development. Land remediation may also be undertaken intensively at the beginning of the development process, where this does not conflict with the need to provide suitable mitigation for key habitats prior to their loss.

Figure 10-12 Lodge Hill Concept Diagram



10.113 The evidence base for the Core Strategy includes a number of Lodge Hill-specific documents that assess infrastructure requirements/provision for the development. It sets out the responsibility and funding source for delivery of each element, and the consultation bodies who have a bearing on the delivery. It demonstrates that there are good prospects of this being provided to enable the scale of development expected within the Plan period to be delivered, consistent with the requirement set out in PPS12.

10.114 The landowner's consultant team has been working closely with the Council and other relevant agencies. This early engagement has informed the indicative masterplan and is reflected in the site-specific evidence base. It will continue through the Development Brief process, the initial planning application and over the longer term to ensure that the strategic allocation is delivered in accordance with the policy.

Monitoring

10.115 A number of formal and informal mechanisms are already in place to monitor progress of this strategically important project. An extensive development team is in place, as are arrangements for ongoing community and stakeholder engagement.

10.116 As the project develops progress will be reported formally through the Annual Monitoring Report but this is likely to be supplemented by at least six monthly project reviews and update reports to the Rural Liaison Committee and other relevant bodies.

10.117 The following indicators and targets will be used to monitor the progress of Lodge Hill.

Table 10-23 Monitoring Targets for Lodge Hill

Indicator	Target
Progress through planning process, delivery of related documents	- Adoption of development brief by December 2011 - Outline planning permission granted by mid/late 2012
Dwelling completions at Lodge Hill	- First dwelling completion 2014 - Average annual completions of c. 300 dwellings (after 2014) - Total of approximately 4,300 dwellings completed during plan period
Amount of floorspace developed for employment uses at Lodge Hill	- Minimum of 43,000m² delivered during plan period <i>Amount of floorspace delivered within use classes B1, B2 and B8, annually and cumulatively*</i>
Achievement of sustainability goals	<i>Energy infrastructure operational*</i> <i>Number of dwellings delivered at each Code level*</i> <i>Overall energy, carbon & water</i>

Indicator	Target
	<i>savings against Building Regulation compliant development*</i> • <i>% energy needs met through on site generation*</i> • <i>Number of households and businesses registered members of car club*</i> • <i>% waste recovery and % reduction in waste sent to landfill during construction and operational waste phases*</i>
Amount of off-site wildlife delivered	• <i>Ensure no net loss of key habitats</i>
Delivery of green infrastructure and open space at Lodge Hill	• <i>Delivery of countryside park*</i> • <i>Delivery of a linear park (including ecological areas) and water landscaping*</i> • <i>Area of open space provided within development area*</i> • <i>Length of cycle/footpath connections delivered*</i>
Provision of transport and social infrastructure at Lodge Hill	• <i>Public transport service & interim priority measures (or alternative measures to promote the bus service) in place by end 2013</i> • <i>Final public transport priority measures in place*</i> • <i>Delivery of footbridges at Four Elms Roundabout & over A228 to Hoo by end 2013</i> • <i>Opening of supermarket*</i> • <i>Floorspace of retail & town centre uses delivered*</i> • <i>Delivery of primary & secondary schools, health centre and community centre*</i>

*Where appropriate, targets for these indicators will be set through the development brief and planning application process and will be monitored once in place

11. Implementation, Monitoring and Review

Introduction

- 11.1 To deliver the Core Strategy's spatial vision, objectives and targets, a robust implementation and monitoring framework is needed to ensure that outcomes are realised. This chapter identifies mechanisms for delivery, key milestones and delivery partners and provides a framework to monitor progress. It also sets out the basis for what are often termed 'developer contributions'. The Council, as a Local Planning Authority, is required to publish an Annual Monitoring Report (AMR). This assesses progress against core indicators and policies. Significantly, the AMR should also highlight what actions might be necessary to address core indicators and policies that are not being achieved.
- 11.2 Whilst the Council has produced the spatial strategy, its development has been informed by contributions from a wide range of stakeholders who will also support its delivery. The Core Strategy will be implemented by the Council working with its partners, through the planned investment of private and public resources and by proactively managing development through planning applications and related planning processes.

Delivery Partners

The Private Sector

- 11.3 Implementation will be heavily dependent on investment by the private sector through new build or the redevelopment of key land uses such as housing (including affordable housing) and employment (including retail). Much infrastructure is also dependent upon private sector investment, including some transport improvements, utilities upgrades and green infrastructure.
- 11.4 As new developments are built, developers are expected to contribute towards a range of facilities through Developer Contributions.
- 11.5 This can affect the viability of individual developments, which have varying costs and constraints. The pattern of development proposed in the Core Strategy has been carefully assessed in this respect and three points need to be borne in mind:
- Provision has been made for a greater scale of development than is actually required to deliver the strategy. This is to provide for reasonable flexibility and ensure that the strategy can be progressed in a volatile economic climate
 - Medway's location in the Thames Gateway means that it has some of the most complex and difficult development sites thanks to a legacy of past industrial use, flood risk and contamination. In these complex cases some element of public subsidy is likely to be required to bring them forward and prospects for this are uncertain. This again points to the need for flexibility in delivering the strategy
 - The Council has well developed systems in place to assess the viability of sites and negotiate in a transparent and consistent way with developers.

Other Public Sector Bodies

- 11.6 The Council will work with other public sector bodies, such as the Department for Communities and Local Government, Department for Transport, the Homes and Communities Agency and the Local Economic Partnership to deliver this spatial strategy. A particular focus will be placed on working with these partners to deliver key infrastructure (e.g. transport, green infrastructure and utilities) and development (residential and employment) projects.

Local Strategic Partnership

- 11.7 The LSP is comprised of a number of partners and is a forum for collectively reviewing and steering public resources in Medway to meet the needs of the local communities. Together, these partners have a direct role in developing, delivering and monitoring this spatial strategy. Many 'public' facilities will be provided through Medway Council, their partners and charitable and voluntary organisations working in partnership. The Sustainable Community Strategy 2010 closely reflects this spatial strategy and has the support of these partners.

Implementing Development

- 11.8 Although the Council, as local planning authority, determines planning applications for new development it has little direct control over when these are brought forward or implemented if permission is given. As such it is heavily reliant on private developers voluntarily coming forward with proposals. Even in a strong economic climate this can be unpredictable but prospects are particularly uncertain in the current economic downturn.
- 11.9 In response to the downturn in the market the Council was one of the first in the country to bring in a system of deferred payments for development contributions. It also has a structured process for pre-application discussions and it brokers introductions with affordable housing providers. Progress is monitored by, amongst others, the Medway Strategic Housing Board that reports into the Local Strategic Partnership.
- 11.10 Severe reductions in public funding have impacted on the Council's ability to directly support the regeneration programme but it nevertheless remains a top priority of the authority as set out in the Council Plan.
- 11.11 Policy CS 34 takes account of these factors and sets out the primary mechanisms the Council will use to implement the Core Strategy.

Policy CS34: Implementation of the Core Strategy

The Council will utilise all appropriate measures to ensure the effective implementation of the Core Strategy. These include:

- **Working closely with partners, particularly in delivering supporting infrastructure**
- **Seeking additional resources to bring forward strategic regeneration sites**
- **Ensuring that progress is closely monitored and, where**

necessary, remedial action taken

Intending developers are strongly advised to:

- **Discuss proposals at an early stage using the pre-application process**
- **Ensure significant proposals are subject to consultation with the local community before planning applications are submitted**
- **Be prepared to follow an 'open book' approach where the extent or nature of development contributions are at issue**
- **Seek planning advice from the Council before acquiring land to ensure that appropriate costs are reflected in the land value.**

Service partners should keep the Council informed of progress with and changes to their investment programmes to ensure they can be coordinated and adapted to changing circumstances and the Medway Local Infrastructure Plan is kept up to date.

Implementing Infrastructure

- 11.12 New development within Medway needs to be supported by a level and type of infrastructure that is appropriate to meet the needs of existing and future residents. This may be achieved through the protection and improvement of existing infrastructure and/or requiring new infrastructure to be established alongside new development.
- 11.13 PPS12 states that the Core Strategy is a means for orchestrating the necessary social, physical and green infrastructure to ensure sustainable communities are delivered. In order to ensure that the infrastructure needed to support development in Medway is delivered, the Council needed to establish a comprehensive understanding of the infrastructure requirements of future development and growth, and work with partners to identify how it will be provided.
- 11.14 There are many delivery partners responsible for the delivery of various parts of the Strategy. The key areas relate to housing, employment and retail development. Work undertaken to prepare an Infrastructure Plan has examined what will be needed, where it is to be located, when it will be provided, who is responsible and the means to implement and deliver the development. Further detail can be found in the Infrastructure Delivery Schedule at the end of this chapter.

Monitoring and Implementation Framework

- 11.15 The following Monitoring and Implementation Framework (MIF) has been derived from work undertaken to provide a baseline position for both the Spatial Strategy and the Sustainability Appraisal.
- 11.16 The MIF set out below identifies how Core Strategy Policies are to be implemented, by when and by whom. It also sets out indicators to monitor these policies. As stated above, the Council reports annually on core indicators as well as national indicators in the AMR. The Sustainability Appraisal also includes a monitoring framework to monitor the performance of the Council's spatial strategy against sustainability criteria in order to ensure

more sustainable development is secured. The MIF therefore builds on these existing processes, rather than establishing an additional framework and will likewise be reported in the AMR.

Review

- 11.17 Significant issues or changes in circumstances, which might necessitate a full or partial review of the Core Strategy, will also be considered through the AMR.

Developer Contributions

- 11.18 The Council has powers to enter into planning obligations with those who have an interest in the land concerned. These are set out in S106, 106A and 106B of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004). They are a means of ensuring that the environment is safeguarded and that necessary infrastructure and facilities are provided to serve new development and offset any consequential planning loss to the area.
- 11.19 Regulation 122 of the Community Infrastructure Regulations 2010 (CIL) sets out the tests for such obligations. It is unlawful for a planning obligation to be taken into account when determining a planning application for development that is capable of being charged by CIL if the obligation does not meet the following tests:
- Necessary to make the development acceptable in planning terms
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 11.20 Medway Council's Guide to Developer Contributions, a *Supplementary Planning Document*¹¹, sets out what obligations and contributions will be required for future developments in accordance with Government guidance. Developers are expected to take account of, and meet the requirements of, this document before submitting planning applications to the Council. It is designed to help them know what the Council is likely to require for new developments in Medway.

Community Infrastructure Levy

- 11.21 The Community Infrastructure Levy (CIL) is a new charge that local authorities can choose to introduce to fund infrastructure in their area. The CIL regulations came into force in April 2010. CIL is intended to provide greater certainty, predictability and transparency as to the level of contribution that will be required, as it takes the form of fixed standard charges.
- 11.22 Medway Council will establish an appropriate Charging Schedule for the Community Infrastructure Levy. It will go through a process of public consultation and Independent Examination before becoming operative. Funding from the CIL will then be used to help finance any necessary improvements to infrastructure. The Council has set out, in its revised Local

¹¹ <http://www.medway.gov.uk/environmentandplanning/planning/developercontributions.aspx>

Development Scheme (LDS), its timetable for adopting its CIL. In the meantime, its Developer Contributions Guide SPD will continue to be applied.

- 11.23 The Infrastructure Delivery Plan is intended to provide the evidence to support a Medway Infrastructure Charging Schedule. It will need to be supplemented by an economic viability assessment of the impact of any proposed levy when the charging schedule is submitted for examination.
- 11.24 The accompanying Infrastructure Delivery Schedule identifies infrastructure of importance to the overall delivery of the LDF. Fortunately the scale and location of development proposed in the Core Strategy is not dependent upon critical infrastructure works such as major new road links. However a range of infrastructure will still be required to ensure that new and existing developments are properly integrated, the natural environment is protected and new residents have access to essential services.

Policy CS35: Developer Contributions

Developers will be required to make provision for infrastructure where the need arises directly from development. The Council will seek to enter into a legal agreement with developers to provide for new or improved physical infrastructure, social, recreational and community facilities (including education facilities) and environmental mitigation or compensation measures where mitigation on site is impossible or inadequate on its own. Provision will be sought in proportion to the size and nature of the individual development and will take into account the existing pattern of provision in the locality.

Provision will be made on the site where this can be reasonably achieved. When this is not the case, contributions will be sought for the provision of new or improved infrastructure or facilities and ecological features elsewhere, provided their location can adequately serve the development site or are appropriately related to it.

The Council will produce and implement a Community Infrastructure Levy (CIL) Charging Schedule that will specify the levels of payments required in respect of specific types of development. This will replace legal agreements in appropriate cases to fund necessary infrastructure projects.

This policy will be adapted, as necessary, in the Guide to Developer Contributions to reflect Government guidance and regulations in force at the time.

Table 11-1 Monitoring and Implementation Framework

Policy	Policy summary points	Timescale			Implementation	Monitoring indicators
		Short 1-5 yrs	Medium 5-10 yrs	Long 10-15 yrs		
CS1 Regenerating Medway	Major physical change in Chatham centre	✓	✓	✓	Chatham Historic Dockyard Trust Network Rail Train Operator Companies	Multiple Deprivation Index of Deprivation Completion of retail, mixed use and commercial floor space
	The creation of a dynamic new mixed use waterfront environment on the west bank of the River Medway		✓	✓		
	The creation of a new community at Rochester Riverside	✓	✓			
	Further development of the Chatham Historic Dockyard as a heritage destination and commercial quarter	✓	✓	✓		
	Development of the Interface Land		✓	✓		
	Completion of the residential communities at St. Mary's Island	✓				
	Completion of the residential communities Gillingham Waterfront.	✓				
	Sensitive change within Gillingham town centre to reinforce its role as an important 'District' centre	✓	✓	✓		
	The creation of enhanced station environments and interchange facilities	✓	✓	✓		
	The creation of a high quality public realm	✓	✓	✓		
CS2 Quality & sustainable design	New buildings in Medway will be expected to meet the highest architectural standards that reflect or generate local distinctiveness through: · The expression of function and structure · The use of materials · Appropriate proportions, visual order and detailing · The application of environmental criteria.	✓	✓	✓	Via planning applications	Housing Quality - Building for Life Assessments Number of planning applications which make reference to conditions as listed in policy summary points
	New development should result in buildings, streets, spaces and neighbourhoods, which are high quality, durable and well integrated with their surroundings	✓	✓	✓		
	The acceptability of tall buildings (18m or higher) and the protection of strategic views will be determined in accordance with the Council's Building Heights Policy 2006.*	✓	✓	✓		

CS3 Mitigation & adaptation to climate change	Applications for major sites (25 houses or more) should be accompanied by an 'Accessibility Assessment'	✓	✓	✓	✓
	Applications for significant regeneration sites, large, or sensitive sites should be accompanied or preceded by a design brief that is subject to a public consultation process.	✓	✓	✓	✓
	Residential development will be required to achieve at least level 3 of the Code for Sustainable Homes	✓			Via planning applications
	Commercial buildings over 1,000 sq m will be required to meet the BREEAM "very good" standard.	✓	✓		Via planning applications
CS4 Energy Efficiency and Renewable Energy	The Council will support the proposals in the Final Water Resources Management Plan, 2010-2035 or other measures that have been agreed to improve the efficiency of water use and maintain supplies at the level required to meet local needs.	✓	✓	✓	Southern Water
	All new development will be expected to show reduced energy loads through passive design and the inclusion of energy efficiency measures.	✓	✓	✓	Via planning applications
	In developments of 10 dwellings or more, or over 1,000 sq m of floor space, it will be expected that 20% of the remaining on-site energy loading will be delivered from renewable energy sources.	✓	✓	✓	Energy providers
	Should it prove feasible to do so, the Council will promote large scale district heating schemes that utilise waste heat from conventional power generation	Not known			
	Subject to there being no significant adverse effects in terms of the natural environment and residential amenity the Council will positively promote the installation of all forms of renewable energy systems.	✓	✓	✓	
CS5 Development and Flood Risk	Compensatory measures will be sought and applied to current buildings within the locality	✓	✓	✓	
	Proposals for development within flood zones 2 and 3 and on sites of over 1 hectare in zone 1 must be accompanied by a flood risk assessment.	✓	✓	✓	Via planning applications
		✓	✓	✓	
Number of residential completions achieving at least level 3 of the Code for Sustainable Homes, or the national timescales mentioned.					Number of planning permissions granted contrary to Environment
Percentage of commercial completions over 1,000 sq m meeting the BREEAM "very good" standard.					Number of retrofitting schemes carried out
Monitored by OFWAT					Potentially reflected in number of properties in fuel poverty/high heat loss reducing
Percentage of applications conforming with energy requirement					Relevant planning applications
					Number of retrofitting schemes carried out
					Potentially reflected in number of properties in fuel poverty/high heat loss reducing
					Number of planning permissions granted contrary to Environment

CS6 Preservation and Enhancement of Natural Assets	Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.	✓	✓	✓	✓	Development management	Agency advice on flooding and water quality grounds Number/percent of applications conforming to conditions listed in policy summary points
	Proposals in areas at risk from flooding must demonstrate that account has been taken of the resilience of buildings, infrastructure and other important local features.	✓	✓	✓	✓		
	Relevant flood defence works as identified in the Medway Strategic Urban Flood Defence Strategy should be incorporated, if applicable. All developments which have the potential to affect the ability of land to absorb rainwater will be required to incorporate and obtain approval for sustainable urban drainage systems (SUDS) in line with national standards, prior to construction.	✓	✓	✓	✓		
	All development within flood zones 2 and 3 will require surface water run-off to be controlled as near to its source as possible.	✓	✓	✓	✓		
	Wildlife habitats and sites, populations of wild species and other biodiversity features will be protected, maintained and enhanced, especially through long term management and habitat creation schemes, particularly where they have been identified as being of international, national and local importance and as priorities in the UK and Kent Biodiversity Action Plans, or where they are protected or designated under relevant legislation.	✓	✓	✓	✓		
	The management of farming, agricultural land, forestry and woodland so as to conserve and enhance biodiversity will be encouraged.	✓	✓	✓	✓		
	When development is permitted, opportunities will be pursued and secured for the incorporation, enhancement, re-creation or restoration of wildlife habitat, either on-site, off-site or through contributions to the strategic provision of natural open space. Such strategies should be in place and functioning prior to commencement of the development.	✓	✓	✓	✓		
							Hectarage of land lost Number/area of new habitat created Contributions received towards opens spaces Amounts and actions done on management of sites

	Where the negative impact cannot be avoided, but the importance of the development is considered to outweigh the impact, then environmental compensation will be sought by the creation by the developer of new habitats or features on other suitable sites and their long term management will need to be secured. Compensation will normally be sought on more than a like-for-like basis, in order to secure both the maintenance and enhancement of biodiversity.	✓	✓	✓			
CS7 Countryside and Landscape	Development in the countryside will be permitted in accordance with the objectives and principles of PPS4 and PPS7.	✓	✓	✓	✓	Via planning applications Medway Council Amenity Organisations	Landscape Character Assessments Number of schemes implemented taking account of proposals in listed studies
	Existing features, which are important to the local landscape character, shall be retained, incorporated into the development and protected during construction work	✓	✓	✓	✓		
	The Council will take into account the proposals in the Medway Landscape Character Assessment, the Green Cluster Studies, the Valley of Visions project, the Medway Smile Living Landscape Scheme and the Kent Downs AONB Management Plan when working with its partners to identify and implement landscape and habitat enhancement schemes.	✓	✓	✓	✓		
CS8 Open Space, Green Grid and Public Realm	The Council will seek to provide equal opportunities for all people to enjoy accessible, high quality and affordable open space.	✓	✓	✓	✓	Via planning applications Medway Council	Number of applications observing these guidelines
	New or enhanced urban spaces should be provided as a part of major regeneration proposals.	✓	✓	✓	✓		
CS9 Health and Social	The development of sustainable places in Medway with healthy communities and social infrastructure where residents enjoy a high quality of life	✓	✓	✓	✓	Medway Council & Partner agencies	Health deprivation by – Index of Deprivation

Infrastructure	The Council will continue to implement its Neighbourhood Action Plans at All Saints, Brook Lines, Strood South, Twydall and White Road Estate, and develop two more at Luton and Gillingham North.	✓	✓				Standardised mortality ratio Average life expectancy Early deaths – heart disease & stroke, cancer Teenage pregnancy rate
CS10 Sport and Recreation	Improve the quality of life of existing and future residents of Medway and promote healthier lifestyles	✓	✓	✓		Medway Council NHS (PCT, SHA)	Adults participation in sports Number/type of facilities lost
	Safeguard existing facilities for sport	✓	✓	✓			
	Continue to develop a strategy to maximise the potential local benefits of the London Olympics 2012	✓					
CS11 Culture and Leisure	In order to realise the significant cultural and leisure potential of the area, to improve the quality of life of existing and future residents, promote healthier lifestyles and a participative and inclusive community.	✓	✓	✓	✓	Lead: Medway Council	Via monitoring of Cultural Strategy
	Support the implementation of Medway's Cultural Strategy which encompasses a range of cultural provision	✓	✓	✓	✓		
	The development of new cultural venues centred on Chatham and extending along the Medway waterfront.		✓	✓	✓		
CS12 Heritage Assets	Supporting the conservation/ enhancement of the historic environment and contribution made to local and regional distinctiveness and sense of place	✓	✓	✓	✓	Medway Council English Heritage Planning applications	Heritage Assets Register
	Encouraging proposals that make sensitive use of historic assets through regeneration	✓	✓	✓	✓		
	Supporting World Heritage Site status for the Chatham Dockyard and its Defences	✓	✓	✓	✓		
CS13 Housing Provision and Distribution	Provision will be made to ensure at least 17,930 new homes can be delivered between 2006 and 2028, (an average of 815 per	✓	✓	✓	✓	Planning applications	Net additional dwellings a) in previous years b) for reporting year c) in future years

	year), of which at least 17,500 will be within the Thames Gateway Area.						Number of new and converted dwellings on previously developed land Housing trajectory - 2006-2028
CS14 Affordable Housing	25% affordable housing provision will be sought on all sites within the existing defined boundary of the main urban area and Hoo St. Werburgh	✓	✓	✓	✓	✓	Gross affordable completions (count) Affordable completions as proportion of all completions
		✓	✓	✓	✓	✓	
		✓	✓	✓	✓	✓	
CS15 Housing Design and Other Housing Requirements	Sustainable residential communities will be created by requiring the provision of a mix and balance of good quality housing of different types and tenures and having regard to the North Kent Strategic Housing Market Assessment.	✓	✓	✓	✓	✓	Housing Quality - Building for Life Assessments
CS16 Gypsies, Travellers and Travelling Show people	To meet the identified need for Gypsy, Traveller and Travelling Show people pitches within Medway, sufficient sites will be allocated within the Allocations and Development Management Development Plan Document.	✓	✓	✓	✓	✓	Net additional pitches (Gypsy and Traveller)
CS17 Economic Strategy	The development of the Medway economy will be dynamic and widely based, to provide employment for the community as a whole, to provide greater choice for the workforce, offer an alternative to out-commuting and achieve a balance with housing growth.	✓	✓	✓	✓	✓	Amount and type of completed employment floor space. Amount and type of employment land available

							Job Seekers Allowance claimant count & rate Employment rate GVA per capita Business stock
CS18 Tourism	Medway Council will positively promote sustainable tourism development.	✓	✓	✓		Medway Council Planning applications	Number of visitor stays in Medway Length of season Average length of stays
	A diverse and high quality tourism offer will be encouraged that seeks to lengthen the tourism season, increase the number and length of visits, provide job opportunities and sustain the tourism economy, whilst maintaining and where possible, enhancing Medway's natural and built environment qualities	✓	✓	✓			
CS19 Retail and Town Centres	Medway Council will maintain and enhance the vitality and viability of its network of urban and rural centres and support the delivery of appropriate comparison and convenience retail, office, leisure, community, entertainment and cultural facilities.	✓	✓	✓	✓	Medway Council Planning applications	Net completions A1-A3 Gross completions in town centres
	Town centres and edge of centre sites will be the preferred location for such development and a sequential test will be applied for development elsewhere in accordance with PPS4.	✓	✓	✓	✓		Number of planning applications not according with sequential test GCSE attainment rate NVQ levels
CS20 Education and Personal Development	The Council will work with all relevant partners to develop a fully integrated educational offer	✓	✓	✓	✓	Medway Council	

CS21 Conventional Energy Generation & Energy Security	Support for additional power generation and energy storage capacity on Hoo Peninsula & Isle of Grain;	✓	✓	✓	✓	DECC Power Generators Medway Council	<i>Economic benefits to be monitored by Economic Development team</i>
	Promotion of local supply chain developments and a support & maintenance cluster.	✓	✓	✓	✓		
CS22 Provision of Minerals	Imposing conditions requiring the reclamation and reuse of construction and demolition wastes on redevelopment sites.	✓	✓	✓	✓	Medway Council	Production of primary land won aggregates
	Allocating sites for the processing, sorting and distribution of secondary aggregate materials in the forthcoming Allocation and Development Management Plan Document. All existing mineral wharves will be safeguarded against proposals that would prejudice their use for the continued importation of marine dredged sand and gravel, crushed rock and associated materials.	✓	✓	✓	✓	Planning applications	Primary aggregates imports (marine dredged and land won and crushed rock from outside Medway) Production of secondary/recycled aggregates
CS23 Waste Strategy	Appropriate provision for the separation, storage and collection of waste materials in all new build;	✓	✓	✓	✓	Planning applications	Capacity of new waste management facilities
	Permission for appropriate facilities for the reuse, recycling, treatment and transfer of waste materials	✓	✓	✓	✓	Waste operators	Amount of waste arising, and managed by management type.
CS24 Transport and Movement	Proactive management of highway system to avoid congestion	✓	✓	✓	✓	Lead: Medway Council	UTMC monitoring
	Balancing of car growth and public transport via increased capacity, reliability and quality of public transport	✓	✓	✓	✓		Bus satisfaction
	Rationalisation of parking in town centres – particularly Chatham via use of multi storey facilities	✓	✓	✓	✓		Amount/% of provision achieved

CS25 The River Medway	The River Medway is strategically significant in terms of its employment, environmental, transport and leisure importance.	✓	✓	✓	Lead: Medway Council	Permitted development completed on Waterfront
	Mixed-use development will be promoted along the urban waterfront.	✓	✓	✓	Planning applications	New infrastructure installed
	Greater use will be made of the River with existing infrastructure protected and new facilities encouraged.	✓	✓	✓	Conservator	Water Quality & SPA condition
	Leisure activities on and along the river will be supported as long as they will not harm the natural ecosystems	✓	✓	✓	Nature conservation bodies MSEP Environment Agency	
CS26 Strood	The role of Strood as a district centre will be strengthened by: Promoting housing and mixed use developments on sites that will enhance the townscape and cohesion of the centre	✓	✓	✓	Natural England Lead: Medway Council Planning applications	Progress in implementing Town Centre Master plan
CS27 Rochester	The highest priority will be given to the conservation and enhancement of the historic and architectural character of Rochester Town Centre whilst maintaining its vitality and viability as a district centre and its function and character as a specialist retail, service and tourism centre	✓	✓	✓	Lead: Medway Council Planning applications	Progress measured via: Rochester Conservation Management Plan Corporation Street Development Brief Rochester Riverside Development Brief
CS28 Chatham	The centre of Chatham will be developed as a regional hub and as the city centre for Medway in accordance with the principles of the Chatham Centre and Waterfront Development Framework and Development Brief and the regeneration, economic and retail policies of the core strategy.	✓	✓	✓	Lead: Medway Council Planning applications	Chatham specific development completion monitoring figures

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CS29 Gillingham	In Gillingham Town Centre, priority will be given to the improvement of the built fabric and public realm through the development of a mix of town centre uses, the provision of open space and the promotion of the evening economy, in accordance with the Town Centre Development Framework in order to strengthen its role as a district centre.	✓	✓	✓	✓	Lead: Medway Council Planning applications	Gillingham specific development completion monitoring figures
CS30 Rainham	Rainham town centre will continue to function as an important district level centre and reinvestment in and extensions to the 'Precinct' centre will be encouraged. Hempstead Valley Shopping Centre is also classified as a 'district' level centre.	✓	✓	✓	✓	Lead: Medway Council Planning applications	Rainham specific development completion monitoring figures
	Opportunities to diversify the mainly comparison based shopping offer and provide a wider range of non-retails services typical of a district centre will be encouraged	✓	✓	✓	✓		
CS31 Hoo Peninsula and the Isle of Grain	Supporting retention & development of local services / facilities sustaining village life & reduce travel need;	✓	✓	✓	✓	Lead: Medway Council Planning applications	Progress in implementing approved projects % loss/gain in quality agricultural land
	Promoting access for walking & cycling, developing visitor sites and improved Green Grid connections;	✓	✓	✓	✓		
	Supporting strong economic development sustaining local communities & retaining distinctive character.	✓	✓	✓	✓		
	There will be a presumption against development that would lead to the loss of the highest quality agricultural land	✓	✓	✓	✓		
CS32 Medway Valley	The focus on green infrastructure planning in the Cobham-Shorne-Ranscombe area will be maintained to make provision for access and management of the high quality environment.	✓	✓	✓	✓	Medway Council Planning applications	Medway Valley specific development completion monitoring figures
CS33 Lodge Hill	Lodge Hill will be developed as a freestanding mixed-use settlement.	✓	✓	✓	✓	Medway Council Lead developer	See Table 10.3 Medway Core Strategy for Lodge Hill monitoring measures/milestones
CS35 Developer Contributions	Money received and facilities provided in accordance with the Council's Guidance.	✓	✓	✓	✓	Medway Council	Annual income & expenditure

Table 11-2 Infrastructure Delivery Schedule

	Development Site (plus site source)	Scale	Phasing	Infrastructure Requirement	Development dependent?	Funding Source	Contingency Planning Required?
Hoo/ Chattenden	Lodge Hill (Strategic Allocation)	Phase 1 • Approx. 1684 residential dwellings • Approx. 16,406 sq m of Business floor-space (offices and Knowledge Park). • East Gate village 'hub' provided. • 50% of the central 'core' area inclusive of key service elements. • Food Store delivered	2013-2020	• Widening of Dux Court Road, speed reduction and traffic capacity improvements at the roundabout with the A228. • Site access provided at the eastern edge of the site. • Potential additional eastern access road created. • Footway / cycleway bridge over the A228 provided. • On-site roads installation within Phase 1 area. • Provision of a new bus service. • Central spine road provided as construction haulage road, plus A228 off-slip at Chattenden to provide access for construction traffic. • Provision of appropriate mitigation on the strategic road network. The scale, nature, location and timing to be agreed between the Highways Agency and all relevant parties • First primary school • Installation of Public Realm and GI in proportion to development. • Enabling works (demolition, vegetation clearance, remediation and earthworks) undertaken in Phase 1 area. • On-site utilities provided within the Phase 1 area (Water, LV, Energy infrastructure,	Yes	Developer	Range of homes, employment/retail figures and mix of uses appropriate for flexibility (resilience) over LDF. Infrastructure reliant on phasing of housing (particularly schools and health - level TBC by Medway Council / Medway NHS). Phase (1) Soil Treatment Facility installed. Onsite soil treatment and reinstatement to be undertaken on a phased basis.

				- Gas connection). - Surface water drainage works and attenuation undertaken within Phase 1 area. - Provision of foul drainage infrastructure, including 2 pumping stations - Primary Substation requisition. - Connections to existing LV supply (2MVA) established. - Primary Substation installed. - Initial water bodies formed for aesthetic and attenuation purposes. - Creation of the East Gate and Lodge Hill Wood Neighbourhoods. - Landscaping of Wyborne Wood, Deangate Wood, Lodge Hill Wood, Rough Shaw Wood, Eastern Shelterbelt, Central Shelterbelt, Market Square, Rams Bottom Wood, and creation of the Ridge Beacon Projects and Countryside Park. - All associated landscaping works undertaken to facilitate 'arrival' corridor to East Gate. - Creation of the East Gate Local Hub (convenience retail & village office). - Provision of the Central Hub food-store, and Approx. 50% of town centre convenience retail facilities and town centre village offices. - Initial works to Chattenden East area, likely to include limited residential development, local Hub (approx 20% of mixed use e.g. local convenience shop/offices/community centre/parking) - Off-site habitat creation to mitigate for loss			

				of on-site key habitats.				
Lodge Hill (Strategic Allocation)	Phase 2 ● Approx. 1884 residential dwellings. ● Approx. 22,050 sq m of Business floor-space. ● 50% of Elderly Care Residential Provision. ● West Gate Village 'hub' provided. ● Remaining 50% of the central 'core' (mixed use) hub. Hotel facilities provided at both Lodge Hill and Chattenden.	2019-2026	● Completion of remaining improvements at Four Elms roundabout. ● Works to facilitate access to Chattenden. ● On-site roads installation within Phase 2 area. ● Expansion of bus link service to serve Phase 2. ● Traffic measures as required to address cut-through traffic. ● Enabling works (demolition, vegetation clearance, remediation and earthworks) undertaken in Phase 2 area. ● On-site utilities provided within the Phase 2 area (Water, LV, Energy infrastructure, Gas connection). ● Surface water drainage works and attenuation undertaken within Phase 2 area. ● Potential further works required to attenuation in Valley area to increase capacity. ● Creation of Westgate, Denegate and Chattenden West Neighbourhoods. ● Landscaping of the Western Shelterbelt, Central Park, SSSI buffer Zone, Chattenden Wood Nature Reserve, A228, and provision of (other) Heritage Beacon project.	Yes	Developer	Phase (2) Soil Treatment Facility installed. Onsite soil treatment and reinstatement to be undertaken on a phased basis.		

Lodge Hill (Strategic Allocation)	Phase 3 • Approx. 754 residential dwellings. • Approx. 5,644 sq m of Business floor-space. • Remaining 50% of Residential Elderly Care facilities provided.	2025-2028	• Provision of remaining Central Hub mixed uses and Lodge Hill Hotel. • Provision of Westgate Hub. • Provision of further mixed use (approx 40%) at Chattenden Hub, and provision of Chattenden Hotel / Knowledge Park. • Provision of 50% of Elderly Care residential. • First Stage of Secondary School provision. • Provision of the Community Centre/Library. • Second Primary School delivered. • Potential refurbishment of existing Chattenden Primary School. • Third Primary School delivered (either in Phase 2 or Phase 3, depending on need). • Second Stage of GP surgery provision. • Further provision for public realm and GI commensurate with the quantum of development. • Further water body provision to suit the requirements for the attenuation of the site • Off-site habitat creation to mitigate for loss of on-site key habitats.	Yes	Developer	Phase (3) Soil Treatment Facility installed. Onsite soil treatment and reinstatement to be undertaken on a phased basis.

	• Remaining 40% of Chattenden Hub provided.		• attenuation undertaken within Phase 3 area. • Creation of Chattenden Wood, Chattenden North and Chattenden South Neighbourhoods. • Landscaping of Roundtop Wood. • Provision of remaining mixed use (approx 40%) at Chattenden Hub. • Provision of remaining 50% of Elderly Care residential. • Third Primary School delivered (either in Phase 2 or 3, depending on need). • Second Stage of Secondary School provision. • Third Stage of GP surgery provision. • Final water bodies formed for aesthetic and attenuation purposes. • Further provision for public realm and GI commensurate with the quantum of development • Off-site habitat creation to mitigate for loss of on-site key habitats.			
National Grid Property Holdings, Grain Road (Call for sites)	232465sq/m employment space	2011-2016	• Continuing upgrade of routes to Grain;	Part	Developer / Medway	Improved freight & road routes to Grain TBC.
(MC2009/1628 outline)	464,685sqm (B1, B2, B8) 245 sqm Business park management centre (B1 (a), A1, A3, A5)	2016-2021				
Land NE of Kingsnorth Industrial Estate, Hoo (Call for sites)	Groundwork's commenced 250992sqm	2011-2016	• Continuing upgrade of routes to Grain;	Part	Developer / Medway	Improved freight & road routes to Grain TBC.

	employment space. (20752 sqm B1, 115120 sqm B2, 115120 sqm B8)						
	North East Bells Lane Hoo (plg permission)	295 homes Whole site 540 dwellings 381 completed 46 uncompleted 113 not started.	2011- 2016	- Open space and play area; - Wildlife conservation area within site; - Traffic calming on bells lane; - Off-site pedestrian facilities;	Yes	Developer	
	East of Wainscott Road, Wainscott (plg permission)	96 homes, 300sq/m retail area	2011- 2016	- Public open space facilities; - Improvement works to Four Elms Roundabout; signalisation of Sanspareil roundabout; - Traffic calming on Brompton Farm Road and Hollywood Lane; - Highway improvement to Hoo Road and Wainscott Road, inc pedestrian and cycle links	Yes	Developer	
	East of Higham Road, Wainscott (plg permission)	98 homes	2011- 2016	- And provision of new bus shelters on Wainscott Road; - Improved site accesses; new footways and cycleways on Hoo Road; - Healthcare facility (land given to Medway PCT to deliver); - Expansion/improvement of Frindsbury Extra Parish Council's Hall			
Rochester	Riverside (plg permission)	300-700 homes, 2400- 12000sq/m employment space, 4440-6800sq/m retail area	2011- 2016	Off-site utilities (approx £1m foul sewerage reinforcement & £1.2m electricity connection); (part) Riverside Walk, Phase 1A - £260,000: 2011-2012; (part) Public Space, Phase 1A - £300,000: 2011-2012	Yes	Developer / utilities providers	£4m utilities funding gap (uncertainty regards scale of contributions) Potential substantial burden on developers if external providers

		600-1000 homes, 9600-10000sq/m employment space, 2360sq/m retail area	2016- 2021	- Primary school (need to consider development phasing & impact on pupil numbers); - GP practice (rented out to PCT, so cost issues); - Off-site utilities (including approx £2m for gas provision); - Crescent Park & Riverside Walk (part). - Off-site utilities; - St Clement's Park & Riverside Walk (part).			unwilling to fund off-site utilities.
		300-400 homes, 9000sq/m employment space, 1000sq/m retail area	2021- 2026				
		700 homes (2000 homes not started)	2026+	- Utilities; - Riverside Walk (part). - Financial contributions to off-site provision (education/transport).	Yes	Developer	
	Former Mid Kent College City Way (plg permission)	214 homes (Reduced to 59 not started)	2011- 2016	- Improvements to bus facilities; - Improved cycle links; - Equipped play facilities at Jackson's Recreation Ground.	Yes	Developer	
	Former Rochester Police Station Cazeneuve St (plg permission)	65 homes (Not started New application reduces number of units)	2011- 2016	TBC			
	Land at Robins and Day (Peugeot), High St (Call for Sites)	84 homes, 856sq/m employment space, 2275sq/m retail area	2016- 2021	TBC			
	R/O 329 - 377 (Featherstones) High St (MLP 2003 allocation / Call for Sites)	102 homes, 3600sq/m employment space	2021- 2026	TBC			
	University for the Creative Arts, Fort Pitt (Urban Capacity Study)	77 homes	2021- 2026	TBC			

Strood	320 - 344 High Street inc. 42 New Road (MLP 2003 allocation)	66 homes	2021-2026	TBC	Yes	Developers (Outline S106)	Exact cost of flood defence measures unknown at outline stage. S106 yet to be signed (August 2010)
	Temple Waterfront, Roman Way (plg permission)	450 homes, 4500sq/m employment space, 1620sq/m retail area	2011-2016	- Public realm: Temple Manor & Knight Road; - Highway improvements: Cuxton Road/Roman Way junction; - Off-site Doctors Surgery provision. - Flood Defence Strategy measures (Scott Wilson's August 2010 report).	Yes	Developer (Outline S106)	Exact cost of flood defence measures unknown at outline stage. S106 yet to be signed (August 2010)
		(620 units not started) 170 homes, 5800sq/m employment	2016-2021		Part		
	Former Alloy Wheels, Priory Rd (plg permission)	16100sq/m employment space (Not started)	2011-2016	TBC			
	Cuxton Pit No. 3 Cuxton Road (plg permission)	Total 487 dwellings 420 completed 67 under construction	2011-2016	- Improvements to junction between site access and A228/Cuxton Road; - Footway/cycleway connection; - Scheme for retail shop and healthcare facilities.	Yes	Developer	
	Ancaster Garage, Station Rd (plg permission)	68 homes (Not started)	2011-2016	Provision/improvement of equipped play and open space at Broomhill Park.	Yes	Developer	
	North side of Commissioners Rd (Call for Sites)	6000 sq/m employment space	2011-2016	TBC			
	Three Acre site, Roman Way (Call for Sites)	4440 sq/m employment space	2011-2016	TBC			
	Friary Place, r/o 46-98 High St (plg permission)	Retail area New application reduced to 1510 sqm (Not started)	2011-2016	Town centre improvements	Yes	Developer	

	Tesco, Strood (Call for Sites) (With planning permission)	New development of 10200sqm retail area	2011- 2016	• TBC			
	Civic Centre (Masterplan)	398 homes, 2000sq/m employment, 2000sq/m retail	2016- 2021	• Flood Defence Strategy measures (Scott Wilson's August 2010 report).	Part	Developer	Yes, given high Flood Defence costs
	Riverside, Canal Road (Masterplan)	256 homes 320 homes, 860sq/m retail area	2016- 2021 2021- 2026	• Flood Defence Strategy measures (Scott Wilson's August 2010 report).	Part	Developer	Yes, given high Flood Defence costs
	Victory Pier, Pier Road (Akzo) (plg permission)	250 homes, 625sq/m employment space, 850sq/m retail area Including student accommodation hotel shops etc 375 homes, 885sq/m employment space Total 776 549 Not started 227 under construction 151 homes	2011- 2016 2016- 2021 2021- 2026	• Pedestrian & cycle accessibility improvements to Gillingham railway station & wider area; • Pier improvement works.	Yes	Developer	
Gillingham	South Thames Regional Health Authority Land, Gillingham Business Park (plg permission)	12169sq/m employment space	2011- 2016	• Improvements to bus infrastructure on A2; • Improvements to cycle infrastructure on A2 and at junction of Ambley Road. • Access road only constructed so far no other works commenced.			

Crest Packaging Site, Courteney Road (plg permission) MC11069	9750sq/m employment space for garden centre development (undecided) 60 homes (38 Not started 5 under construction 17 completed.)	2011- 2016	- Town centre public realm improvements; - Bus stop improvements.	Yes	Developer	
Howlands Nursery Christmas St (plg permission)	2475sq/m retail area (completed) 1250 sqm B8 completed 2301 sqm other completed	2011- 2016	- Open space/formal play provision at either Grange Road or Strand, Gillingham; - Junction improvements, traffic calming & speed signage at Christmas Street & Church St	Yes	Developer	
Tesco (plg permission)	2475sq/m retail area (completed)	2011- 2016	TBC			
Astra Site, Courteney Rd (plg permission)	1250 sqm B8 completed 2301 sqm other completed	2011- 2016	Air Quality Management / Monitoring improvements	Yes	Developer	No – s106 received
Rainham Mark Grammar School Pump Lane (plg permission)	35 homes 37 under construction	2011- 2016	Open space improvements / sports facilities	Yes	Developer	
Rear of 9-25 Birling Avenue (Call for Sites) Planning permission for 46 refused.	32 homes Not started	2011- 2016	TBC			
Retail Core(High St,Jeffrey St,King St) Gillingham (Development Framework) Outline pp MC10/1095 - 82 Jeffrey St. 12 units not started.	100 homes, 4750sq/m employment space, 3750sq/m retail area	2021- 2026	TBC			

Horsted	Former Mid Kent College, Maidstone Road (plg permission) New application to reduce numbers.	150 homes, 2480 sq/m employment space, 200 sq/m retail area Not started 264 homes	2011-2016 2016-2021	- Improved bus and pedestrian facilities; - Horsted Gyratory system (financial contributions towards).	Yes	Developer				
	BAE Systems (Call for Sites)	11147 sq/m employment space	2011-2016	TBC						
	Woolmans Wood Caravan Site (Withdrawn H&MU DPD)	6160 sq/m employment space	2016-2021	TBC						
	Land between Vanguard Way and George Summers Close (plg permission) New application Sainsbury	14430 sq/m retail area Not started 9354sqm	2011-2016	- Park and Ride facility; - Alteration of Anthony's Way / A289 roundabout; signalisation schemes within vicinity; - Footway widening on Anthony's Way; - River walk; - Improvement / creation of estuarine habitat lost.	Yes	Developer	New application submitted for a different range of goods includes Park & Ride facility.			
Medway City Estate										
Chatham	Sir John Hawkins Car Park (Call for Sites)	120 homes, 3059sq/m retail area	2011-2016	TBC						
	Between Cross Street & The Brook (MLP 2003 allocation)	110 homes, 3680sq/m retail area	2011-2016	TBC						
	1-35 High Street (Grays Garage) (MLP 2003 allocation)	54 homes, 800sq/m employment space, 800sq/m retail area	2011-2016	TBC						
	2 Ash Tree Lane (plg permission)	55 homes 8 not started 47 under construction	2011-2016	Traffic calming measures.	Yes	Developer				

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	Chatham Retailing, Clover/Richard/Rhode/High Sits (MLP 2003 allocation)	28000sq/m retail area, 11440sq/m employment space	2021-2026	• TBC			
	Chatham Railway Station (Development brief)	279 homes	2026+	• TBC			
	West of Maidstone Road, adj Chatham Rail Station (Development brief)	173 homes	2026+	• TBC			
	Wickes, New Cut (Development brief)	79 homes	2026+	• TBC			
	55-105a The Brook & 1, 5, 11 & 13 King St (Development brief)	50 homes, 4113sq/m retail area	2026+	• TBC			
	2-14 Railway Street & 142-146 High Street (Development brief)	51 homes, 1228sq/m retail area	2026+	• TBC			
	Land at High St, Union St and New Road (Development brief)	9852sq/m retail area, 590sq/m employment space	2026+	• TBC			
Maritime & Brompton	Land at St Mary's Island Maritime Way Chatham Maritime (plg permission)	Phased delivery of 1700 homes, inc: 280 homes (Part) 1263 completed 20 under construction 417 not started 117 homes (Part)	2011-2016 2016-2021	- Landscaping/recreational areas throughout phasing; - Roads and footways throughout phasing; - Healthcare facility (upon completion of 100th home – see right) - Primary school (upon completion of 300th home); - Secondary access (upon completion of 300th homes); - Community building (upon completion of 500th home).	Yes	Developer	Pharmacy

	Interface Land, Chatham Maritime (SLAA) Updated alternative option:	(approx) 25000sq/m University development & 500 student bed-spaces 525 homes, 44,500 sq/m employment space + university 34 homes	2011-2026	- Flood Defence Strategy measures (Scott Wilson's August 2010 report). - On-site and off-site utilities (unknown at present, depends on mix and quantum).	Yes	Developer	Approx University cost of £75m+. Exact mix of uses yet to be established by landowner/developer.
	Amherst Hill, Brompton (MLP 2003 allocation)	248 homes	2011-2016	TBC			
	RSME Kitchener Barracks, Brompton (Withdrawn H&MU DPD)	75 homes, 5220sq/m retail area	2016-2021	TBC			
	J7, Chatham Maritime (Call for Sites)	175 homes, 3000sq/m employment space, 700sq/m retail area 550 Not started 250 homes 100 homes	2011-2016 2016-2021 2021-2026	- Improvement Junction 4 (M20) overbridge; - Capacity & safety improvement at A228/Bush Road/Station Road junction; - Bus service improvements (new shelters on A228 etc); - New community centre	Yes	Developer	
Halling/Cuxton	Former Cement Works, Formby Road, Halling (plg permission)	69 homes Not started	2011-2016	Improvements to pedestrian / cycle facilities.	Yes	Developer	
Luton	Southern Water, Capstone Rd (plg permission)	40 homes	2011-2016	TBC			
Rainham & Wigmore	Queens Court, Chichester Cl, Rainham (Call for Sites)						

	Hempstead Valley Shopping Centre (Call for Sites)	2774sq/m retail area	2011-2016	• TBC			
	Planning permission	9730sqm retail					
		845 D1					

Appendix A. Schedule of Superseded (Replaced) Policies

Superseded Policies:

Local Plan Policy No.	Policy	Core Strategy Policy No.
S1	Development Strategy	CS1, 17, 24, 6, 7, 8, 12
S2	Strategic Principles	CS2, 32, 4, 19, 26 To 32
S4	Landscape And Urban Design Guidance	CS2, 7
S5	Medway's "City" Centre	CS1, 24,28,19, 8
S6	Planning Obligations	CS34
S7	Rochester Riverside Action Area	CS1, 2,12, 24,27
S9	Chatham Historic Dockyard	CS2, 12
S10	Strood Waterfront Action Area	CS1, 8, 9, 2, 24, 6, 26, 12, 17
S12	Kingsnorth	CS17, 21
S13	Isle Of Grain	CS17, 21
S14	Ministry Of Defence Estate, Chattenden	CS33, 13, 17,19, 24
BNE1	General Principles For Built Development	CS2, 8
BNE4	Energy Efficiency	CS4
BNE12	Conservation Areas	CS12
BNE14	Development In Conservation Areas	CS12, 7, 8, 2
BNE25	Development in the Countryside	CS7
BNE26	Business Development in rural Settlements	CS7
BNE28	Farm Diversification	CS7
BNE29	Farm Shops	CS7
BNE31	Strategic Gap	CS7
BNE32	Areas of Outstanding Natural Beauty	CS7
BNE33	Special Landscape Areas	CS7
BNE35	International and National Nature Conservation Sites	CS6, 7
BNE36	Strategic and Local Nature Conservation Sites	CS6, 7
BNE37	Wildlife Habitats	CS6, 7, 8
BNE38	Wildlife Corridors and Stepping Stones	CS6, 7, 8
BNE39	Protected Species	CS6
BNE40	Cliffe Conservation Park	CS6, 7
BNE44	Community Woodlands	CS6, 7, 8
BNE45	Undeveloped Coast	CS5, 6, 7, 8
BNE48	Agricultural Land	CS7
ED9	Chatham Port	CS24, 25
ED11	Existing Tourist Facilities	CS18
ED14	Bed & Breakfast Accommodation and Guest Houses	CS18
H3	Affordable Housing	CS14
H5	High Density Housing	CS15

Local Plan Policy No.	Policy	Core Strategy Policy No.
H10	Housing Mix	CS15
H11	Residential Development in rural Settlements	CS7
H13	Gypsy Caravan Sites and Travelling Showpeople's Quarters	CS16
R10	Local Centres, Village Shops and Neighbourhood Centres	CS19, 26 To 32
R11	Town Centre Uses and the Sequential Approach	CS19
R13	Retail uses and the Sequential Approach	CS19
L13	Water Based Leisure	CS25
T5	Bus Preference Measures	CS24
T6	Provision for Public Transport	CS24
T9	River Buses and Piers	CS24, 25
T10	Wharves	CS24, 25
T11	Development Funded Transport Improvements	CS34
CF1	Community Facilities	CS9, 10, 11
CF2	New Community Facilities	CS9, 10, 11
CF4	Primary Healthcare Facilities	CS9
CF5	Nursing and Special Care	CS15
CF7	Further, Higher and Adult Education	CS17, 20
CF9	Power Stations	CS21
CF11	Renewable Energy	CS4
CF13	Tidal Flood Areas	CS5

Appendix B. Schedule of Current Supplementary Planning Documents

Item	Type*	Title	Date Adopted	Remarks
Adopted Development Briefs and Masterplans				
1	SPG	Rochester Riverside Development Brief Rochester Riverside Development Brief (pdf 2,800KB)	2004	Conforms with Policy S7 of Medway Local Plan. Supplemented by the Rochester Riverside Green Charter Green Charter (pdf 263KB)
2	SPG	Wainscott Development Brief Wainscott Development Brief (pdf 906KB)	2004	Conforms with Policy H1 of Medway Local Plan
3	SPG	Grange Farm Development Brief Grange Farm Development Brief (pdf 685KB)	2004	Conforms with Policy H1 of Medway Local Plan. Will be revoked in the near future as the development is nearing completion
4	SPG	Chatham Town Centre and Waterfront Development Framework Chatham Centre and Waterfront Development Framework (pdf 6,985KB)	2004	Conforms with Policy S5 of Medway Local Plan. Provides an overall context for development in Chatham town centre and the subsequent more detailed masterplans listed below
5	SPG	Star Hill to Sun Pier Planning and Design Strategy Star Hill to Sun Pier Planning and Design Strategy (pdf 6,918KB)	2004	Conforms with Policy BNE12 of Medway Local Plan. Covers the Townscape Heritage Initiative area (THI) and complements that scheme
6	Special	Gillingham Waterfront Development Brief Gillingham Waterfront Development Brief (pdf 1,923KB)	2004	Adopted as a development brief but as a departure from the Medway Local Plan given it was not known at the time the local plan was adopted that the site would become available for redevelopment. Relates to the former Akzo Nobel site
7	SPD	Pentagon Development Brief Pentagon Development Brief (pdf 1,769KB)	2006	Complementary to Chatham Centre and Waterfront Development Framework and conforms with Policy S5 of Medway Local Plan
8	SPD	Temple Waterfront Development Brief Temple Waterfront Development Brief (pdf 3,465KB)	2006	Conforms with Policy S10 of Medway Local Plan and covers the area from Roman Way to Knight

Item	Type*	Title	Date Adopted	Remarks
				Road
9	SPD	Strood Riverside Development Brief Strood Riverside Development Brief (pdf 4,079KB)	2006	Conforms with Policy H1 of Medway Local Plan and covers the waterfront between Rochester Bridge and the Medway City estate, including Canal Road
10	SPD	Gillingham Town Centre Planning Framework Gillingham Town Centre Planning Framework (pdf 9,957KB)	2007	Conforms with Policies BNE22 and R5 of the Medway Local Plan and covers the main town centre area
11	SPD	Chatham Centre and Waterfront Development Brief Chatham Centre and Waterfront Development Brief (pdf 15,907KB)	2008	Conforms with Policy S5 of the Medway Local Plan and complementary to Chatham Centre and Waterfront Development Framework. Incorporates three masterplans – for the Brook, the Station Gateway and the Waterfront
12	SPD	Corporation Street Development Framework Corporation Street Adopted Framework (pdf 6,848KB)	2008	Conforms with Policy S7 of the Medway Local Plan and complementary to the Rochester Riverside Development Brief. Covers the area from Rochester Station to Rochester Bridge
13	SPD	Gun Wharf Masterplan http://www.medway.gov.uk/pdf/Chatham%20High%20St%20Best%20St%20masterplan%20report.pdf	2010	Conforms with a number of local plan policies. Covers the area from the Historic Dockyard boundary to the Waterfront open space. The final document is currently being readied for publication following its adoption by Cabinet
14	SPD	Best Street/High Street Chatham Masterplan http://www.medway.gov.uk/pdf/Gun%20Wharf%20Masterplan%20SPD.pdf	2010	Conforms with a number of local plan policies. Covers the area from Best Street to the Brook and from Union Street to Railway Street/Military Road. The final document is currently being readied for publication following its adoption by Cabinet
15	SPD	Interface Land Development Brief http://www.medway.gov.uk/pdf/The%20	2010	Conforms with a number of local plan policies. Relates

Item	Type*	Title	Date Adopted	Remarks
		Interface%20Land%20SPD%20October%202010.pdf		to a site between the Chatham Historic Dockyard and Chatham Maritime
16	Other	Strood Town Centre Masterplan http://www.medway.gov.uk/strood_town_centre_masterplan_report_final.pdf	2009	Endorsed by the Cabinet to inform the Local Development Framework Core Strategy and planning decisions in the area
17	SPD	Amherst Hill Design Brief http://www.medway.gov.uk/PDF/Amherst%20Hill%20Design%20Brief%20Oct%202010.pdf	2010	Conforms to local plan policy H1 and relates to a site to the rear of Kitchener Barracks
Other Adopted Supplementary Planning Documents				
18	SPD	A Building Heights Policy for Medway A Building Heights Policy for Medway Part 1 (pdf 4,075 KB), Part 2 (pdf 3,968KB), Appendix (6,275KB)	2006	Prepared in accordance with CABE/English Heritage guidance. Covers central Medway
19	SPD	Development Contributions Guide Developer Contributions Guide (pdf 2,438KB)	2008	Conforms with Policy S6 of the Medway Local Plan. Covers the whole of the administrative area
Conservation Area Appraisals				
20	CA	Brompton Lines Conservation Area Appraisal, 2006 http://www.medway.gov.uk/brompton_lines_ca_appraisal_all-2.pdf	2006	Not prepared under planning legislation but material considerations in the areas covered
21	CA	Upper Upnor Conservation Area Appraisal, 2004 http://www.medway.gov.uk/upnor_ca_appraisal_publication_1105.pdf	2004	
22	CA	Upper Bush Conservation Area Appraisal, 2004 http://www.medway.gov.uk/upper_bush_conservation_area_appraisal_rev.pdf	2004	
23	CA	New Road, Chatham, Conservation Area Appraisal, 2004 http://www.medway.gov.uk/new_road_chatham_adopted_version.pdf	2004	
24	CA	Maidstone Road, Chatham, Conservation Area Appraisal, 2004 http://www.medway.gov.uk/maidstone_road_chatham_adopted_version.pdf	2004	
25	CA	Historic Rochester Conservation Area Appraisal http://www.medway.gov.uk/index/environment/9984.html/conservedareas/102816.htmwill	2010	
Conservation Guides				

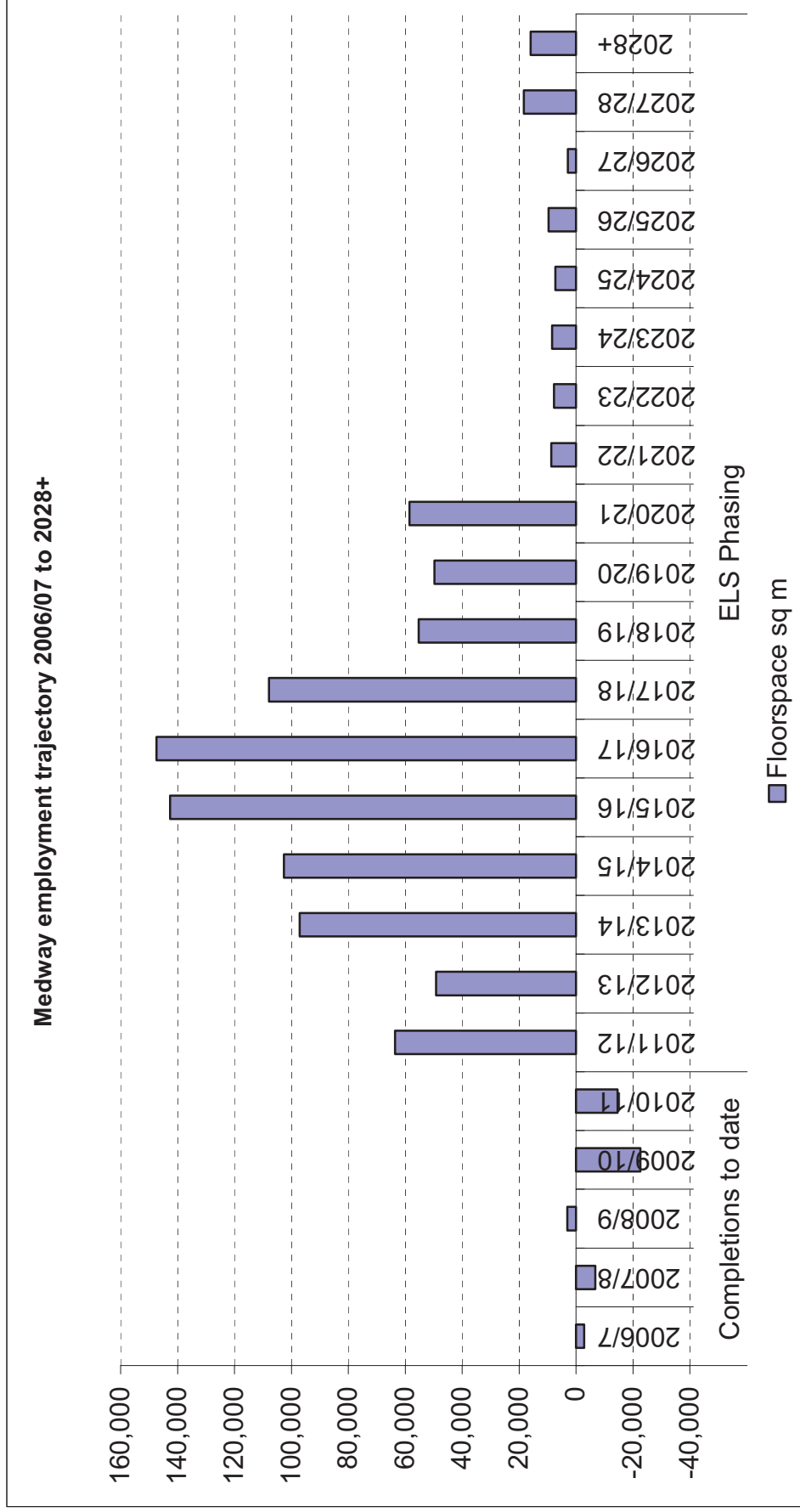
Item	Type*	Title	Date Adopted	Remarks
26	Other	Conservation Areas in Medway http://www.medway.gov.uk/conservation_areas_jan_07.pdf	2007	General guides
27	Other	Listed Buildings in Medway http://www.medway.gov.uk/listed_buildings_leaflet.pdf		
28	Other	Watts Avenue/ Roebuck Road design guidance http://www.medway.gov.uk/watts_ave_booklet.pdf		
29	Other	Gillingham Park design guidance http://www.medway.gov.uk/gillingham_park_bklt-5.pdf		

Appendix C. Housing Trajectory and Sources of Supply 2006 - 2028+

	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	Totals
Past completions	591	761	914	972	657																		3895
Projected Completions Identified Sites						631	572	713	750	997	1379	1144	1246	1217	1260	1062	917	932	759	645	364	508	15096
Projected Completions Small Sites with Planning Permission						69	49	86	40	39	2												285
Total Projected Completions						700	621	799	790	1036	1381	1144	1246	1217	1260	1062	917	932	759	645	364	508	15381
Cumulative Completions	591	1352	2266	3238	3895	4595	5216	6015	6805	7841	9222	10366	11612	12829	14089	15151	16068	17000	17759	18404	18768	19276	
Cumulative Requirements	815	1630	2445	3260	4075	4890	5705	6520	7335	8150	8965	9780	10595	11410	12225	13040	13855	14670	15485	16300	17115	17930	
Cumulative Surplus/Deficit	-224	-278	-179	-22	-180	-295	-489	-505	-530	-309	257	586	1017	1419	1864	2111	2213	2330	2274	2104	1653	1346	
Draft Core Strategy Requirements	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	17930

Source: Housing Phasing Estimates as at June 2011. This data will be incorporated into the next review of the SLAA and the Annual Monitoring Report at the end of 2011.

Appendix D. Employment Trajectory



Data source Employment Phasing Estimates as at June 2011. This data will be incorporated into the next review of the SLAA and the Annual Monitoring Report at the end of 2011.

Appendix E. Transport Objectives, Schemes And Actions In The Third Local Transport Plan (LTP3)

Transport objective 1: Highway maintenance

Schemes/actions:

- Maintenance of highway assets including improvements to street lighting, traffic signals and highway drainage
- Medway Tunnel upgrade including operating and control systems
- Structural infrastructure maintenance including to bridges retaining walls etc.
- Carriageway maintenance
- Footway and cycle track maintenance
- Public rights of way maintenance.

Transport objective 2: Improving Infrastructure Capacity

Schemes/actions:

- Network management, guided by the Network Management Plan
- Operation of Urban Traffic Management and Control. This is currently being implemented and is expected to
 - Improve the operational efficiency of the highway network;
 - Provide real time travel and parking information to drivers;
 - Respond to incidents on the network;
 - Enable bus routes to be more punctual and reliable with improved journey times;
 - Measure traffic related air quality and mitigate pollution episodes where possible;
 - Link to neighbouring local authorities and the Highway Agency to enable sub regional traffic management.
- Tackling congestion hotspots. These are listed below, along with the intended programming of schemes designed to achieve improvements. Normally this will be in the form of capacity improvements to junctions to relieve bottlenecks and aid free flowing. They are also intended to improve air quality.

Location of existing and predicted congestion hotspots on key strategic corridors		
Location (link or junction)	Programme period	Justification of programme position
A229 gyratory junction with former Mid Kent College, Horsted	Short	To be delivered as part of the upgrading of the existing Park & Ride site
A289 link between Four Elms roundabout and Medway Tunnel including Sans Pareil and Anthony's Way roundabouts and exit from Medway City Estate.	Short / medium	Phased intervention to link to the development of Lodge Hill, Chattenden development to improve capacity and junction operation. Currently under investigation

A2 Corporation Street junctions with The Esplanade & Gas House Road	Short / medium	Works to be delivered as part of the current bus priority scheme
A2 junction with Canal Road	Short / medium	Delivery timeframe dependant on the completion of the A2 Corporation street works
A2 junctions and link between Chatham Hill and Canterbury Street junctions	Medium	Significant localised congestion. Major intervention required to tackle problem and increase capacity
A2/A228 links through Strood town centre	Medium	Delivery timeframe dependant on the completion of the Darnley Arch bridge widening. Scheme to be developed
A228 junction at Darnley Arch Bridge, Strood	Medium	Delivery timeframe dependant on the completion of the Darnley Arch bridge widening
A2 Star Hill junction with A229 City Way roundabout	Medium	Delivery timeframe linked to the development of Rochester Riverside and the completion of the A2 Corporation street bus priority and public realm works
A231 Dock Road junction with Wood Street roundabout	Medium	Transport modelling indicates increasing congestion hence this position in programme
A278 junction with Sharsted Way/Wigmore Road	Medium	Transport model results indicate increasing congestion hence this level of priority
A2 junction with Mierscourt Road, Rainham	Medium	Significant localised congestion. Major intervention required
A2 junctions with A278 Hoath Way & A289 Ito Way	Long	Transport modelling indicates this position in programme
B2004 link through Lower Rainham	Long	Transport modelling indicates this position in programme

- Strategic car park management. Actions will focus on:
 - The rationalisation of existing spaces in Chatham and the development of three strategically located car parks
 - A review of parking charges to discourage long stay parking in identified locations (this action to be delivered in conjunction with the expansion of Park and Ride facilities)
 - Review the overall parking provision in centres of regeneration
 - A robust process to secure developer contributions towards the provision and operation of town centre parking and Park and Ride sites
 - Operation of real-time monitoring and display of car parking availability.
 - A temporary additional car park at Strood Civic Centre
- Management of freight, including through:
 - Further improvements to the A228 to Grain

- Improvements to the Thamesport freight line, including Hoo junction (in Gravesham)
- Directing HGV traffic away from unsuitable roads
- Ensuring major freight traffic generating developments provide access to the rail network for freight movements
- Encouraging freight operators to use rail and river transport options
- Monitoring growth in freight movements originating from International Gateways throughout Kent and working sub-regionally to mitigate negative consequences
- Investigating the provision of faster and more reliable highway linkages from business, storage and distribution sites to the strategic highway network.

Transport objective 3: Improving public transport

Schemes/actions:

- Improving travel by bus and taxi, including through:
 - Development of *Fastrack* style bus links to Chattenden and other major development sites
 - The development of new Park & Ride sites together with supporting routes and infrastructure
 - Expansion of Quality Public Transport Corridors routes to support service improvements
 - Development of traffic management schemes that contribute to more reliable bus journey times
 - Expansion of the real-time information system and/or text messaging service to all stops across the bus network
 - Development of sub-regional bus services in partnership with operators and neighbouring authorities
 - Improved ticketing and fares initiatives, including investigating the introduction of Smartcard technology potentially in partnerships with neighbouring authorities
 - Continued support for initiatives that encourage young people to use bus services.
 - Improved promotion of bus services, in particular through workplace and residential travel plans and personalised travel planning
 - Enhanced promotion of bus services through all forms of media.
 - Review of taxi rank locations and waiting facilities for accessibility and personnel safety
 - Investigating the provision of CCTV in all taxis operating in Medway
 - Investigating the opportunities for concessions to use travel credits in taxis or buses using a smartcard based system
 - Investigating the potential for a new river crossing to support public transport, walking and cycling between the Medway City Estate and Chatham
 - Improved partnership working with operators to identify opportunities to improve the operational environment for public transport
 - Improved customer care training for front line staff, including considerate driving skills and supporting vulnerable user groups
 - The introduction of bus stop improvements, which aid accessibility for passengers whilst assisting in reducing layover times at bus stops
 - The use of on-bus CCTV parking enforcement to ensure bus priority routes remain congestion free.
- Developing park and ride, including:
 - Expansion of the existing Park & Ride site at Horsted
 - New Park & Ride site at Whitewall Creek (developer funded)

- New Park & Ride sites to be identified near Strood
- New Park & Ride site to be identified to the east of Gillingham, possibly located on or close to Gillingham Business Park
- Quality Public Transport Corridors linking Park & Ride sites to key destinations
- Operation of bus services between Park & Ride sites and key destinations
- Implementation of town centre parking strategy to reduce long stay car parking spaces in town centres.
- Improving travel by train, including through:
 - Major station improvements, including:
 - Reconstruction and possible relocation of Rochester station (identified in Kent RUS, 2010);
 - Reconstruction of Strood station
 - Reconstruction and reconfiguration of Chatham station to support regeneration and improve the gateway to the town centre
 - Delivery of accessibility improvements to stations, including forecourt improvements at Rainham station
 - Capacity improvements at Rochester bridge junction as part of East Kent resignalling (identified in Kent RUS, 2010)
 - Improved transport interchange opportunities at key mainline stations
 - Encouragement of cycling to stations by improved cycle links and more secure cycle parking.
- Coach travel, focussing on coach park and ride
- Community transport, focussing on the further development of the Villager service
- River transport and river crossings, focussing on:
 - Maintaining and developing a comprehensive network of piers that could support a river taxi and other leisure related services
 - Seeking a partner to operate a river taxi or possibly an amphibious vehicle
 - Investigate the potential for a new river crossing for pedestrians, cyclists and public transport.

Transport objective 4: Encouraging active travel and improving health

Schemes/actions:

- Accessibility to bus services by:
 - A programme of bus stop improvements, building on a network where 60% of the high frequency bus stops are accessible
 - Alterations to bus stops to increase patron's feelings of safety whilst waiting for services including the introduction of CCTV
 - Investigation of measures to allow those with learning disabilities to undertake independent travel
 - Partnership working with operators to investigate opportunities to reduce costs and utilise savings in the reduction of fares and /or increased frequency of services.
- Encouraging walking, including through:
 - The development of schemes that allow easy access to local shopping facilities and amenities with priority given to those in areas of socio-economic deprivation
 - Improving accessibility to public rights of way through network and waymarking improvements, including making more of the network accessible to people with mobility difficulties

- Participation in the regional Coastal Access project and sub-regional Valley of Visions project
 - Ensuring new development provides adequate facilities to access facilities by foot
 - Expanding the walking bus initiative.
 - Increasing opportunities to access play and park facilities as a pedestrian
 - Develop schemes that remove barriers to pedestrian movement including a programme of installing drop kerbs at junctions.
- Encouraging cycling, including through:
 - Participation in the development of a sub-regional cycle network and enhancement of the National Cycle Routes
 - Promotion of cycle facilities and the health benefits of cycling
 - Organised cycling activities
 - Ensuring new development provides adequate facilities for cyclists, including off-site cycle links
 - Supporting the Sustrans cycle ranger scheme
 - Enhancing existing routes by improved maintenance and minor improvements
 - Increasing and improving secure cycle parking
 - Creating new opportunities for recreational cycling, by developing more facilities off-road and on quiet roads
 - Expanding the existing utility cycle network by infilling gaps and making linkages to key destinations.
- Green Grid through the delivery of the transport elements of the strategy and ensuring major developments are linked to the Grid where this is practical
- Improving air quality, including through:
 - Development of air quality management area (AQMA) traffic management schemes with the key objective of improving local air quality
 - Development of operational protocols, to enable UTMC to respond to episodes of poor air quality
 - Supporting interventions that contribute to tackling poor local air quality
 - Working with Network Rail to widen Darnley Arches, which have been identified as a significant point of constriction on the network associated to poor air quality
 - Investigate opportunities to disseminate high-resolution air quality data to hospitals and doctors surgeries to assist patients with respiratory illnesses
- Design guidance for developments by:
 - Taking account of new design guidance when considering estate layouts, for example *Manual for Streets*
 - Updating current design standards and parking standards
 - Reviewing and publishing a highways adoption manual
 - The use of shared space at selected locations
- Travel Plans, with outcomes focussing on:
 - Increasing active travel by encouraging walking and cycling
 - Promoting public transport use
 - Improving accessibility to goods, services and employment for people without access to a car
 - Reducing the need to travel, particularly during peak periods

- Proactively monitoring the success of travel plans associated with new development and seeking additional measures if targets are not achieved

Targeting travel plans for:

- Existing and new schools without an active travel plan (developed in conjunction with the Safer Routes to School initiative in objective 5)
- Significant employers or areas of employment
- Major new residential developments
- Further and Higher education establishments

Transport objective 5: Improving travel safety

Schemes/actions:

- Road safety schemes, including:
 - Alterations to the road environment to modify road user behaviour
 - Alterations to the road layout (on a varying scale) to control vehicle movements
 - Additional on-street parking restrictions in locations where road safety is compromised
- Road safety education and training, with actions including;
 - Continuing *Bikeability* cycle training for school students
 - Practical pedestrian training
 - Monitoring and training school crossing patrols
 - Working with schools to deliver the correct road safety message to the correct age group
 - Educational Resources loaned to schools
 - Working with partners to focus on vulnerable road users including young drivers and moped riders
 - Extend the Junior Road Safety Officer scheme
- Road safety publicity and promotion, with campaigns and promotion focussing on:
 - Drink and drug driving
 - Distractions in collision causation
 - Being visible on the highway network
 - Walk to School schemes throughout the year
- Road safety enforcement
- Safer routes to school, including through;
 - Improvements to key pedestrian routes from key catchment areas to schools
 - Expanding the existing walking bus initiative
 - Appropriate highway infrastructure and focused parking enforcement in the vicinity of school entrances
 - Campaigns and initiatives
 - Information and education on safer walking
 - Providing bus safety education
 - Encouraging schools to work with neighbouring schools so that joint initiatives can reflect any wider issues within the area
- Community safety initiatives.

Glossary of Terms

Affordable Housing	Housing provided for those people who need to be in an area but who are unable to afford open market prices or rents.
Ancient Semi Natural Woodland	Woodland likely to have existed prior to 1600 and containing trees and shrubs that are predominantly native. All stands of ancient woodland, which does not obviously originate from planting.
Annual Monitoring Report (AMR)	Authorities are required to prepare annual monitoring reports to assess the implementation of the local development scheme and the extent to which policies in local development documents are being achieved.
Appropriate Assessment	Appropriate Assessment is a requirement of the EC Habitats Directive 92/43/EEC and EC Birds Directive 79/409/EEC and is used to assess the impacts of a land use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.
Area Action Plan (AAP)	Planning frameworks for areas of change and areas of conservation.
Biodiversity	The number and variety of species found within a specified geographical area
Brownfield sites/Land (Derelict land, Recycled land)	Previously developed land that is, or was, occupied by a permanent (non-agricultural) structure and associated fixed surface infrastructure. The definition covers the curtilage of the development (except housing). It may occur in both built up and rural settings.
Call for Sites	The process of asking landowners and developers, to put forward sites to Medway Council to consider for development for the period up to 2026 and beyond. Sites should be able to accommodate 5 or more dwellings or are 0.15 hectares or greater in size
Carbon Capture and Storage	This is a means of mitigating the contribution of fossil fuel emissions to global warming, based on capturing carbon dioxide and storing it away from the atmosphere by different.
Category A Trees	Trees that are particularly good examples of their species, especially if rare or unusual, of significant conservation, historical, commemorative or other value or those of particular visual importance.
Climate Change	Rising global temperatures which will result in changes in weather patterns, rising sea levels and increased frequency and intensity of extreme

	weather
Cluster	A geographical concentration of inter-connected businesses
Coastal squeeze	Areas of mudflat or salt marsh that are reducing in area as a result of rising sea levels against increasingly defended land.
Combined heat and power (CHP)	Technology for energy recovery systems, which provides both electricity and heat and can be linked to community heating schemes or to individual premises.
Commitment	A development proposal which is allocated in a development plan or for which planning permission has been granted.
Comparison Shopping/Goods	Higher value non-food goods (consumer durables such as clothing, footwear, jewellery, books, etc) – purchases tend to be less frequent than everyday items, and often involve comparison between different items and brands. Traditionally associated with High Street shopping.
Conservation Area	An area designated under the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 on account of its special architectural or historic interest where its character and appearance should be preserved and enhanced.
Convenience Shopping/Goods	Food, drink and other frequently purchased lower value items e.g. household cleaning materials, newspapers, and confectionary.
Core Strategy	A development plan document, forming part of the local development framework that sets out the long term spatial vision for an area with strategic policies and proposals to deliver that vision
dB	A decibel is a unit for measuring the intensity of a sound.
Derelict land	Land so damaged by industrial or other development that it is incapable of beneficial use without treatment.
Development	The carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.
Development Brief	A supplementary planning document prepared in support of policies and proposals within the Development Plan. They inform developers and other interested parties of the constraints and opportunities presented by a site and the type of development expected or encouraged by local planning policies.

Development Plan Document (DPD)	Spatial planning documents covering a range of policy areas that will undergo a process of consultation and are subject to alteration following independent examination.
District Centre	Shops, separate from the town centre, usually are containing at least one food supermarket or superstore, and non-retail services such as banks, building societies and restaurants.
Ecological Footprint	An ecological footprint is a concept based on how much land and water area a human population needs to produce the resources required to sustain itself and to absorb its wastes, given prevailing technology.
Ecosystems	A complex set of relationships between species and habitats of an area. Ecosystems vary in size with each species dependant on one another
Edge of centre	A location that is well connected to and within easy walking distance of the primary shopping centre.
Environmental Compensation/Mitigation	Mechanisms whereby the loss of environmental resources can be mitigated or compensated for where an environmental feature is lost, with a feature of at least equivalent value.
Green Belt	Green Belts are specifically established through development plans and consist of predominantly open land around urban areas and other settlements with the strategic role of preventing the outward expansion of built up areas, safeguarding the surrounding countryside from encroachment, assisting urban regeneration and providing areas for outdoor recreation.
Green Corridors/Green Grid	A network of open spaces, often linear in nature, possibly linked and providing connections between town and country.
Greenfield land/sites	Previously undeveloped land within or beyond the confines of built up areas. National definition of this (PPG3) includes former mineral working which has been the subject of an agreed restoration programme.
Greenhouse Gas	A gas in the Earth's atmosphere (such as carbon dioxide) that absorbs infra-red radiation emitted by the Earth's surface as a result of exposure to solar ultra-violet radiation, thus increasing the mean temperature of the planet.
Green Infrastructure	Sustainable Drainage systems (SUD's), flood risk management water resource management, tackling of heat island effect e.t.c.
GEA	Gross External Area
Gross Value Added	Measures the contribution to the economy of each individual producer, industry or sector in the United

	Kingdom and is used for the estimation of Gross Domestic Product (GDP)
Household	One person living alone or a family or group of people living at the same address and sharing domestic facilities and housekeeping arrangements.
Landbank	A supply of land intended for a particular purpose. For minerals it relates to the mineral reserves associated with land that has planning permission.
Landfill	The deposition of waste onto hollow or void space in the land, usually below the level of the surrounding land in such a way that pollution or harm to the environment is prevented
Listed Building	A Building of special historic or architectural interest. Listing gives a building statutory protection against unauthorised demolition, alteration and extension.
Local Centre	A small group of retail and services outlets usually comprising a newsagent, a general grocery store, a sub post office and occasionally a pharmacy, a hairdresser and other small shops of a local nature.
Local Development Documents (LDDs)	Introduced in the Planning and Compulsory Purchase Act 2004, they comprise both statutory development plan documents (DPD's) and non-statutory Supplementary Planning Documents (SPDs). LDDs include core policies, area action plans, proposals map, site-specific policies and a Statement of Community Involvement.
Local Development Framework (LDF)	Introduced in the Planning and Compulsory Purchase Act 2004, they comprise a 'folder' of Local Development Documents (LDDs). They have replaced the former framework of District Local Plans, Minerals and Waste Local Plans and Supplementary Planning Guidance. They form the framework for delivering the spatial planning strategy for the area. The series of documents, which when adopted will replace the adopted Local Plan
Local Development Scheme (LDS)	The LDS is a public statement identifying which local development documents will be produced, in what order and when.
Local Plans	The lower tier of the former statutory development plan setting out detailed policies and proposals for a local authority's area, or for a particular subject (e.g. the Kent Waste and Minerals Local Plans were prepared for the Kent & Medway area). Local Plans were required to be in general conformity with the adopted Structure Plan for the area.
Local Strategic Partnership	A single body that brings together at a local level the different parts of the public sector as well as the

	private, business, community and voluntary sectors so that different initiatives and services support each other and work together. They are responsible for developing and driving the implementation of Community Strategies and Local Area Agreements (LAAs)
Low Cost Market Housing	Housing provided at a purchase price significantly below prevailing open market prices in the locality. Does not mean either smaller housing or housing built to a lower standard.
Mixed Use Development	Areas/Buildings where a mixture of commercial, retail and residential uses predominate thereby meeting social, economic and cultural needs in one area and contributing to communities with good access to a full range of services and reduced need to travel.
Multi Area Agreement	A voluntary agreement between two or more authorities, their partners and the government working collectively to improve local economic prosperity
National Nature Reserves	Areas defined by English Nature and considered to be of such national importance as to require preservation and management. Designated under section 19 of the National Parks and Access to the Countryside Act 1949 or section 35 of the Wildlife and Countryside Act 1981.
Permitted Development Rights (PD)	Small scale developments, which do not require planning permission from the Local Planning Authority.
Planning and Compulsory Purchase Act 2004	An act to make provision relating to spatial development, town and country planning and the compulsory acquisition of land
Planning Policy Statement (PPS)	Subject specific national Government policies, on national land use in England that replaced Planning Policy Guidance (PPGs) notes.
Previously Developed Land	Land in urban or rural areas, which is, or was, occupied by a permanent (non agricultural) structure and associated fixed surface infrastructure, including the curtilage of the development (except housing). It includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made.
Primary Road Network	Those inter-urban routes, which provide access to within five miles of the larger urban centres. These roads include motorways, trunk roads and primary "A" roads.
Quality Bus Corridors	Quality bus corridors are uncongested, have real time bus information at bus stops and easy access

	onto and off the buses.
RAMSAR Site	Sites designated under the RAMSAR Convention on the Conservation of Wetlands of International Importance Especially Waterfowl Habitat, ratified by the British Government in 1976. Natural England has the responsibility of identifying RAMSAR sites.
Regional Spatial Strategy (RSS)	Identification and definition of policies relating to the development and use of land in the region that were prepared by the regional planning body and approved by the Secretary of State.
Regionally Important Geological and Geomorphological Sites	Designated by locally developed criteria to cover the most important places for geology and geomorphology outside statutorily protected land such as Sites of Special Scientific Interest (SSSI).
Registered Provider	Any organisation registered with the Tenants Services Authority as a provider of social housing. This can include Housing Associations Local Authorities and Private Companies.
Retail Park	Groups of retail warehouses formed into "Centres" generally with shared car parking
Retail Warehousing/Warehouses	Stores specialising in an aspect of comparison goods retailing, frequently trading in bulky goods such as home improvement products, major electrical items, motor accessories, furniture, carpets and garden products and bulky DIY items, catering mainly for car-borne customers and often in out-of-town locations.
Rural Service Centre	Settlements within rural areas that provide an important service role (e.g. employment, shops, community facilities) to their local population and their immediate rural hinterland.
Scheduled Ancient Monument	An archaeological site of national importance (buildings or other structures) included within a schedule compiled by the Secretary of State for Culture, Media and Sport under the Ancient Monuments and Archaeological Areas Act 1979 (as amended by the National Heritage Act 1983), as being of significant archaeological importance. Consent is required from the Secretary of State for works affecting a Scheduled Ancient Monument.
Semi-Natural Areas	An area of native flora and/or fauna species that is apparently natural but has been significantly modified by human activities.
Shoreline Management Plans (SMPs)	Prepared by a group of agencies including local maritime authorities and the Environment Agency. SMPs provide a large scale assessment of the risks associated with coastal processes and present a framework to reduce these risks to

	people, property and the environment.
Sites of Nature Conservation Interest (SNCI)	Identified by the Kent Wildlife Trust (KWT) and considered to be of countywide importance.
Sites of Special Scientific Interest (SSSI)	Nationally important areas for the conservation of wildlife habitats, geological features and landforms. SSSI's are areas of land that have been notified by English Nature as being of special interest under the Wildlife and Countryside Act 1981 or the National Parks and Access to the Countryside Act 1949.
Social rented properties	A form of housing tenure owned and managed by the state or not-for-profit organisations, usually with the aim of providing affordable housing
South East Plan	The South East Plan is the Regional Spatial Strategy (RSS) that set out a vision for the future of the South East Region until 2026, outlining how to respond to challenges facing the region such as housing, the economy, transport and protecting the environment
Spatial Planning	Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.
Spatial Portrait	A description of the main social and economic characteristics which sets out the context for the LDF
Special Areas for Conservation (SAC)	Areas designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna. They contribute to the conservation of biodiversity.
Special Protection Area (SPA)	Areas designated under European Community Directive 79/409 on the Conservation of Wild Birds, to conserve the habitat of rare or vulnerable birds and all regularly occurring migratory birds.
State of Medway Report	One of a series of factual reports produced to inform the preparation of Medway's LDF
Statement of Community Involvement (SCI)	The statement of community involvement explains to local communities and stakeholders how they will be involved in the preparation of local development documents, and the steps that authorities will take to facilitate this involvement.
Strategic Land Availability Assessment	An assessment to identify sites that are available or could become available for housing, employment or other developments in the period up to 2026 and beyond. Sites should be able to accommodate 5 or more dwellings or are 0.15 hectares or greater in size
Strategic Gap	An area of predominantly open land between

	existing urban areas which serves to maintain their separate identity and prevent their coalescence with each other or with smaller nearby settlements.
Sustainable Urban Drainage (SUD)	A sequence of management practice and control structures designed to drain surface water in a more sustainable fashion than some conventional techniques.
Superstores	Self-service stores selling mainly food or food and non-food goods, usually more than 2,500 square metres trading floor space, with supporting car parking.
Supplementary Planning Document (SPD)	Issues and sites for which the local planning authority wishes to provide detailed policy guidance, which will supplement policies and proposals in the development plan documents.
Sustainability Appraisal (SA)	Assessment of the environmental, economic and social impact of policies, to ensure that all policies and proposals reflect sustainable development principles.
Sustainable Community Strategy (SCS)	A document prepared by a local strategic partnership which sets out a vision and plans for agencies, organisations and communities who work together to improve the quality of life in an area
Sustainable Development	Commonly defined as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs” (World Commission on Environment and Development, 1987).
Sustainable Urban Drainage System (SUDS)	SUDS provide for more environmentally sustainable urban drainage through systems designed to reduce run off, slow its rate or provide for filtering, sedimentation and biological degradation of the water.
Thames Gateway	The regional growth area on both sides of the Thames Estuary within North Kent, South Essex and East London which is of national and regional importance for economic regeneration, redevelopment of brownfield sites and the promotion of sustainable development.
Town Centre	City, town and traditional suburban centres, which provide a range of facilities and services and which fulfil a function as a focus for both the community and for public transport. It excludes small parades of shops of purely local significance.
Traffic calming	Measures to reduce vehicle speeds to improve safety and enhance an area’s quality of life.
Thames Gateway Planning Framework	A planning framework that established a set of principles to guide the consideration of future proposals for the development and environmental

	enhancement of the Thames Gateway.
Travel Plans	A package of practical measures to encourage staff and/or visitors to a development to choose alternatives to single occupancy car use and to reduce the need to travel.
Urban Capacity	An estimate of the potential for additional development that can be accommodated within an urban area.
Urban Extension	A large expansion of a town or city
Urban Fringe	Countryside on the periphery of urban areas often subject to development pressures or activities that threaten the appearance/management of the countryside.
Use Classes	A classification of land uses for development control purposes defined by the Town and Country Planning (Use Classes) Order 1987 and subsequent amendment orders. Changes of use of buildings or other land between uses within a single 'use class' are excluded from the definition of development in the Town and Country Planning Act 1990, thus making planning permission unnecessary i.e. A Statutory Instrument which defines broad categories of use of land and buildings.
Waste	Refers to all types of waste including trade, commercial, industrial, construction and demolition, agricultural, mineral, quarrying and household waste.
Windfall sites	Sites, which become available for development, which were not previously identified as allocations or identified as commitments through previous planning permissions.
World Heritage Site	Cultural and natural sites of outstanding world-wide value designated by the World Heritage Committee for inclusion on UNESCO's World Heritage Site list

ATTACHMENT 2

Medway Local Development Framework Submission Core Strategy Schedule of Proposed Minor Amendments to Publication Draft (December 2011)

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
CHANGES MADE IN RESPONSE TO REPRESENTATIONS RECEIVED				
Chapter 1- Introduction				
1	15. CPRE Protect Kent	Paragraph 1.26	Include references to National Planning Policy Framework (NPPF), Localism Bill and the role of Neighbourhood Plans	Localism Act now in force and draft NPPF issued. Factual changes to paras 1.26 and 1.28
Chapter 2 – Context and Issues				
2	40. Land Securities	Paragraph 2.2	Amend text to reflect the most up to date ONS Projections by changing from: “..It is anticipated that Medway’s population will grow from 256, 700 (in 2010) to 278,200 by 2028.....” “..It is anticipated that Medway’s population will grow from 255,400 (in 2010) to 279,600 by 2028....”	Reflects stakeholder comments. New release ONS forecast. Issued since last draft. Para 2.2 updated but local forecast not altered
	40. Land	Paragraph 2.3	Add additional text:	Provides a more up to date

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
	Securities		"In order to inform the Core Strategy, the Council published a series of State of Medway reports in 2008. These set out the baseline from which the Core Strategy was developed. This information provided stakeholders with a common understanding of the context in which the Local Development Framework is being prepared. <u>Updated versions of these State of Medway Reports have now been published (dated January 2012)</u>".	picture. Change to para 2.5
3	34. Kent County Council	Paragraph 2.65	Minor amendment to text from: 2.65 <i>Strengthen the protection and conservation of open spaces. These are vital to everyone's quality of life and are an intrinsic feature of the area.</i> To: 2.65 <i>Strengthen, <u>protect, conserve and increase</u> open spaces. These are vital to everyone's quality of life and are an intrinsic feature of the area.</i>	Reflects change recommended by stakeholder. Change to para. 2.65 as proposed
4	34. Kent County Council	Paragraph 2.66	Insert additional text: "Conserve and enhance the diversity and abundance of habitats and species and seek	Reflects change recommended by stakeholder. Change to

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			to <u>increase the connectivity of existing and new habitats to ensure that development does not result in the isolation of habitats.</u> <i>Biodiversity is a cornerstone of environmental quality but is under pressure, not only from development but also climate change”.</i>	para 2.66 as proposed
Chapter 3 – Vision and Strategic Objectives				
5	15. CPRE Protect Kent	Spatial Vision 3.21	Seek greater recognition of Medway’s countryside in the spatial vision. Suggest amending the first sentence in paragraph 10 (starting Our rural areas...) <i>Our rural areas will continue to be celebrated for their rich natural assets – the quality of their wildlife diversity and their distinctive landscapes – and the contribution that they make to the nation’s food security. The tranquillity of the countryside will be valued by residents and visitors as an important contributor to health and well-being. Rural services and facilities and the environment of the villages will have been enhanced.</i> Create new paragraph from sentence starting The new settlement at Lodge Hill.	Reflects stakeholder comments. Partial change to spatial vision reflecting first part of proposal by CPRE

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
Chapter 4 – Cross Cutting Themes				
6	20. Environment Agency	CS5	Change second paragraph of policy from: <i>“Exceptionally sites within the Medway urban area, which contribute to the regeneration of the area, need to be redeveloped. In such cases and where the tests above cannot be met, development will only be permitted if:”</i> to: <u>“Exceptionally, sites within the Medway urban area, which contribute to the regeneration of the area, need to be redeveloped. In such cases, development will only be permitted if: “</u>	To reflect stakeholder comments. Change to policy CS5 as proposed
7	20. Environment Agency	CS5	Add the following on the end of paragraph 4 of policy, so it reads as: “Proposals in areas at risk from flooding must demonstrate that account has been taken of <u>the Medway Strategic Flood Risk Assessment (SFRA) 2006 and its Addendum 2011</u>, the resilience of buildings, infrastructure and other important local features	To reflect stakeholder comments. Change to policy CS5 as proposed
8	34. KCC	CS7	Include strengthened reference to historic landscape. Suggest adding:	Reflects stakeholder comments. Change to

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			PPS5 to the list of planning guidance in the first sentence of the policy.	policy CS7 as proposed
9	54. Natural England	Para 4.21	Existing paragraph be replaced by following: <i>“It is widely recognised that some climate change is now unavoidable, with a resulting need to start adapting now to the predicted impacts that are likely in the future. For the South East of England predicted impacts include sea level rise, increased flooding, impacts on water supply, agriculture and biodiversity-<u>fragmentation of habitats.</u> One result of increased development and levels of greenhouse gas emissions is what is termed the Urban Heat Island Effect (UHIE). This is the difference between rural and urban temperatures, which has been shown to be up to 7°C. This happens where increased levels of solar absorption and radiation occur and transport, heating and cooling systems as well as industry all add to city heat. In heatwave conditions this can have serious health implications, particularly for the elderly and infirm. It has been recognised that there are a number of</i>	Reflects stakeholder comments. Change to para 4.21 as proposed

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			<i>actions that can help mitigate the impact of UHIEs. These include the use of 'green' roofs, urban tree planting, shading through design, passive heating and ventilation systems and preserving urban open spaces and gardens."</i>	
10	26. Gillingham Football Club	Para 4.122 and CS10	Amend text to reflect club's ambitions for new stadium: <i>Gillingham Football Club is Kent's only football league club. It supports a range of local sports and community development programmes and boosts visitor numbers to the area – over 100,000 per annum. The current ground at Priestfield has been improved but its future potential is limited. The club has ambitions to relocate to a new purpose built stadium and the Council has been working with it to try to achieve this. However, no site or funding has currently been identified in order for this to take place. Nevertheless the Council will continue to work closely with the club to identify opportunities.</i>	Reflects stakeholder comments. Para 4.122 expanded to emphasise the significance of the Club. Additional bulletpoint added to policy CS10

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
11	40. Land Securities	Policy CS12	Add line to Policy CS10: <i>Continue to work with Gillingham Football Club in identifying opportunities for a new stadium and developing its community role within the local area.</i> Suggest rewording to policy: <i>"Medway's historic environment and heritage assets will be persevered and..."</i> Amend Map suggested to improve clarity.	Reflects stakeholder comments. Change to policy CS12 as proposed Reflects stakeholder comments. Revised map included (Fig 4-5)
Chapter 5 - Housing				
12	40. Land Securities	Paragraph 5.12	Amend text in order to tie in with the most recent Strategic Land Availability Assessment update, and the wording of policy CS13: "In relation to the proposed allocation at Lodge Hill, the Core Strategy differs from and the Strategic Land Availability Assessment ~~in that it~~ only assumes that approximately 4,275 of the total provision of 5,000 dwellings will be delivered within the plan period. However, the SLAA still demonstrates a healthy surplus with regard	Recommended change by stakeholder. Change to para 5.12 as proposed

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
13	40. Land Securities	Policy CS13	to the overall housing supply requirement". Amend 5 th bullet point by addition of further wording to acknowledge that not all SLAA sites ultimately may be granted planning permission or be capable of coming forward for development: "Other sites <i>amongst those identified in the Medway Strategic Land Availability Assessment</i> ".	Reflects stakeholder comments. Change to policy CS13 as proposed
14	20. Environment Agency	Policy CS15: Housing Design and Other Housing Requirements	Insert additional paragraph before paragraph entitled "student accommodation proposals.....": "Derelict or brownfield sites on areas affected by historic contamination should be addressed in a comprehensive way to ensure the environment is remediated prior to development commencing and then protected from any future contamination".	Recommended change by stakeholder. Change to policy CS15 as proposed
15	20. Environment Agency	Policy CS16	Amend first paragraph of policy from: "The site is located outside of Flood Zones 2 and 3, or if not, adequate flood defences are, or will be, put in place" to: "The site is located within Flood Zones 1 or	Reflects stakeholder comments. Note: change not yet made to text but recommended as proposed

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			2, and adequate flood defences are, or will be, put in place”	
	20. Environment Agency	Insert new paragraph (after 5.47)	Insert a new paragraph after 5.47: <i>“Planning Policy Statement 25 classifies caravans and mobile homes intended for permanent residential use as Highly Vulnerable and therefore will not be permissible in Zone 3. Temporary and seasonal sites are acceptable in flood risk areas but must be subject to both the Sequential and Exception Tests. All gypsy and traveller sites in flood risk areas will need to have an appropriate flood warning and evacuation plan approved by the Council”.</i>	Reflects change recommended by stakeholder. New para. 5.48 added as proposed
Chapter 6 – Economic Development				
16	26. Gillingham Football Club	Policy CS19	Page 77, Policy CS19: Tourism Retail and Town Centres. Delete the word ‘Tourism’ from policy title	Error correction.
17	40. CBRE for Land Securities	Para 6.23	Give recognition to Lodge Hill as strategic economic priority. Add reference to Lodge Hill.	Reflects stakeholder comments. Lodge Hill added to list of ‘M2 access sites’ in para. 6.23
Chapter 7 – Energy, Waste and Minerals				
18	34. Kent County	Policy CS22	<i>“The Land Allocations and Development</i>	Reflects stakeholder

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
	Council		DPD will define the geographical extent of [remove "the"] Areas of Search in more detail, <i>thereby identifying the potentially environmentally acceptable new quarrying areas.</i>" KCC make the point that its not only wharves that will require to be safeguarded as required by MPS1. Policy CS22 should reflect this; the fifth paragraph should be amended: <i>" All existing, planned and potential mineral railheads, wharfage and associated storage, handling and processing facilities will be safeguarded...."</i>	comments. First change as proposed. Second change as proposed but minus reference to "planned and potential" as too speculative
19	34. Kent County Council	Para 7.30	para. 7.30 should be revised as follows: <i>"The identified mineral bearing areas shown on Fig 7.1 are to be safeguarded as they compose reserves of potentially economic land won sands and gravels."</i>	Reflects stakeholder comments. Change to para. 7.30 but substituting "include" for "compose"
20	34. Kent County Council	Para 7.51	Para 7.51 should be amended to read as follows: <i>"There are no arisings of low-level nuclear and limited radio active wastes in Medway and so local provision is not necessary for such material."</i>	Reflects stakeholder comments. Change to para 7.51 as proposed

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
Chapter 8 – Transport and Movement				
21	8. Brett Group (Davis Jarvis)	Paragraph 8.20	Minor amendment: “In the case of both the River Medway and the Thames, “saved” local plan policies give protection to a number of local wharves as well as the larger docks at Chatham and Thamesport. These include a strategically important aggregates importation wharf at Cliffe, wharves on Medway City Estate and a wharf at Halling. All benefit from reasonable landward access and are well established. It is intended that they, <u>and their associated facilities and sites</u> should continue to be safeguarded over the longer term in order that the area can continue to contribute to national, regional and local needs for maritime capacity”.	Reflects stakeholder comments. Change to para 8.20 as proposed
Chapter 9 – The River Medway				
Chapter 10 – Area Policies				
22	15. CPRE Protect Kent	CS31/para 10.74	Make reference to neighbourhood plans. Suggest change to para 10.74 to include reference to <i>neighbourhood plans</i> in last sentence.	Reflects stakeholder comments. Change to para 10.74 as proposed
23	15. CPRE Kent	Lodge Hill	Change target date in table 10-23 to have	Updated information.

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
		Monitoring table 10.23	Brief adopted December 2011	Change data as proposed
25	37. Kent Wildlife Trust	Lodge Hill Area Policy	Reference should be made within the policy text to mitigation for ecological impact. Add to policy (before "design solutions?") "mitigation for any detrimental impact on protected species within the site and internationally and nationally designated ecological sites nearby"	Reflects stakeholder comments. Change to policy CS33 as proposed
26	37. Kent Wildlife Trust	Lodge Hill Area Policy Off-site mitigation should be included in monitoring table (10-23) and in Infrastructure Delivery Schedule	Add to Table 10-23 (under "sustainability goals") Indicator: Amount of off-site wildlife habitat delivered Target: Ensure no net loss of key habitats Add to IDS (all phases) "off-site habitat creation to mitigate for loss of on-site key habitats"	Reflects stakeholder comments. Change to monitoring table and delivery schedule as proposed
27	54. Natural England	Lodge Hill Area Policy	Given the greater understanding of the level of biodiversity present within the site the policy aim to enhance this will not be achievable so should be worded to reflect an aim for the overall area	Reflects stakeholder comments. Change to policy CS33 as proposed

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			Change policy wording to read "Measures to protect and enhance biodiversity within the locality, including improvements to ecological connectivity "	
28	54. Natural England	Lodge Hill Area Policy	Reference to potential for intensive remediation ahead of development conflicts with principle of establishing replacement habitat before it is lost (para 10.112). Amend text to read "Land remediation may also be undertaken intensively at the beginning of the development process, where this does not conflict with the need to provide suitable mitigation for key habitats prior to their loss."	Reflects stakeholder comments. Change to para 10.112 as proposed
29	69. Southern Water	Lodge Hill Area Policy Policy needs to ensure that water supply and wastewater treatment infrastructure is a requirement of any planning	Add to policy wording "...supporting infrastructure including transport links, utilities , green infrastructure..."	Reflects stakeholder comments. Change to policy CS33 as proposed

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
30	40. Land Securities	permission. Lodge Hill Area Policy GI indicators are duplicated in table 10-23	Remove duplicated section of table	Reflects stakeholder comments. Change as proposed to table 10-23
31	74. Tonbridge & Malling Council	Paragraphs 10.88 & 10.89	Insert minor amendments: <i>“The villages of Cuxton and Lower Halling offer a range of local services and facilities well related to their size. These villages are also connected to the Medway Valley rail line linking Strood, Maidstone and Paddock Wood. Many residents look outside of Medway, particularly to the <u>Tonbridge & Malling</u> and Maidstone areas to access services, such as education and retail. There are local employment sites at Cuxton Marina and in Halling, and farming and forestry are significant. There is scope for limited consolidation of employment land at Cuxton Marina, but only where development realises the opportunity to deliver improvements to the landscape setting of this sensitive area.</i>	Reflects stakeholder comments. Changes as proposed to paras 10.88 and 10.89

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			<i>Much of the land is Metropolitan Green Belt. The Medway Valley also forms part of an area where it is intended to prevent coalescence between Medway and the Maidstone/Tonbridge & Malling area and maintain the character of the various settlements in between”.</i>	
Chapter 11 – Implementation, Monitoring and Review				
32	31. Highways Agency	Table 11.2	Reference to M2 improvement works (J1) in IDS is unclear. Clarify wording in line with HA comments to add: Provision of appropriate mitigation on the strategic road network. The scale, nature, location and timing to be agreed between the Highways Agency and all relevant parties	Reflects stakeholder comments. Change to table 11-2 as proposed
33	20. Environment Agency	Policy CS35	Minor amendments to policy wording: <i>“Developers will be required to make provision for infrastructure where the need arises directly from development. The Council will seek to enter into a legal agreement with developers to provide for</i>	Recommended change by stakeholder. Changes to policy CS35 as proposed

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			<i>new <u>or improved</u> physical infrastructure, social, recreational and community facilities (including education facilities) and environmental mitigation or compensation measures where mitigation on site is impossible or inadequate on its own. Provision will be sought in proportion to the size and nature of the individual development and will take into account the existing pattern of provision in the locality.</i> <i>Provision will be made on the site where this can be reasonably achieved. When this is not the case, contributions will be sought for the provision of <u>new or improved infrastructure or</u> facilities and ecological features elsewhere, provided their location can adequately serve the development site or are appropriately related to it.....”</i>	
34	15. CPRE Protect Kent	Policy CS35	Insert the following text after the 2nd paragraph of the policy: <i>“The Council will produce and implement a Community Infrastructure Levy (CIL) Charging Schedule which will specify the</i>	Reflects stakeholder comments. Amend policy CS35 as proposed

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			<i>levels of payments required in respect of specific types of development in order to fund and deliver necessary infrastructure requirements”.</i>	
35	9. Chatham Maritime Trust	Table 11 02 Infrastructure Delivery Schedule - Maritime & Brompton	Delete reference to a ‘dental surgery’ and replace with ‘pharmacy (now open)”.	Recommended change by stakeholder. Change table 11-02 as proposed
36	40. Land Securities	Table 11 02 Infrastructure Delivery Schedule – Lodge Hill	Insert omitted reference to the delivery of the first primary school which is scheduled to be delivered in phase 1.	Recommended change by stakeholder. Amend table 11-02 as proposed
37	36. Kent Downs AONB	Table 11.01	Add reference: The Council will take into account the proposals in the Medway Landscape Character Assessment, the Green Cluster Studies, the Valley of Visions project, the Medway Smile Living Landscape Scheme and the <i>Kent Downs AONB Management Plan</i> when working with its partners to identify and implement landscape and habitat enhancement schemes.	Recommended change by stakeholder. Change table 11-01 (policy CS7) as proposed

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
38	74. Tonbridge & Malling Borough Council	Figs 2 1, 10 1 & 10 7	Amend, as there are features shown on the maps that do not appear in their Keys.	Reflects stakeholder comments. Insert amended figures
39	40. Land Securities (CBRE)	Fig 10 1: Spatial Sub-Areas	The Figure illustrates the spatial sub-areas discussed in more detail through the remainder of Chapter 10 of the Core Strategy. Within paragraph 10.2 it is made clear that Lodge Hill is considered separately to the rest of the Hoo Peninsular given the scale of change envisaged. Land Sec considers that Fig 10.1 should show the general extent of the Lodge Hill site.	Reflects stakeholder comments. Amended figure to be inserted
CHANGES MADE IN RESPONSE TO RECOMMENDATIONS IN HABITATS REGULATIONS ASSESSMENT				
40	N/A	Para 4.18	It is recommended that the supporting text of Policy CS3 (Mitigation and Adaptation to Climate Change) should include wording to ensure that the Council will support the Kent and Medway Air Quality Network during the life of the plan. It is recommended that the Council requires the monitoring of air quality at key locations within or close to the proposed strategic sites to determine if air quality is worsening	Additional text added to para 4.18 and policy CS3 covering points 1 and 3. Points 2 and 4 can be dealt with separately from the Core Strategy

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			as a result of new development (this is also a recommendation of the Sustainability Appraisal). This information can then inform the Council and County Council's wider approach to air quality management. The Council should support and seek opportunities for a wider approach to the management of Air Quality in North Kent in co-operation with surrounding Authorities. In preparing the Allocations and Other Development Management Policies DPD, the Council should consider opportunities for the phasing and management of construction to minimise any impacts on air quality (especially from vehicular movement).	
41	N/A		It is recommended that the following text should then be inserted at the end of Policy CS6: <i>As part of its commitment to ensuring the ongoing protection of SACs, SPAs and Ramsar sites, the Council will:</i> <i>implement the findings of the bird</i>	Additional text added to policy CS6 as recommended

¹ Sites with outline planning permission should be re-assessed at the reserved matters stage to take account of available evidence at the time.

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			population and visitor studies commissioned by the North Kent Environmental Planning Group; • ensure that any proposed strategic avoidance and/or mitigation measures are adopted, as appropriate in all planning documents and in the assessment of planning applications¹; • adopt a flexible approach that enables development plan documents to be reviewed in the light of emerging evidence; and • deal with developments on a case by case basis - also taking into consideration the potential for in combination effects - based on best available evidence until the full results of the NKEPG studies are available- using a precautionary approach to require HRA where effects are uncertain.	
42	N/A		To address identified issues with regard to the potential for increased access (Policy CS8) to European sites: • It is recommended that Policy CS8 (Open Space, Green Grid and Public Realm)	Cross reference to policy CS6 added to policy CS8 and policy CS21 but further cross references not considered appropriate as

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			should make reference to Policy CS6 and the protection of European designated sites to ensure that changes to the Green Infrastructure network and increased access to coastal areas has no adverse effect on European sites. It is recommended that Policies CS13 (Housing Provision and Distribution) and CS33 (Lodge Hill) cross refer to Policy CS8 (Open Space, Green Grid and Public Realm) to ensure that changes to the Green Infrastructure network and increased access to coastal areas has no adverse effect on European sites. It is also recommended that Policy CS21 makes reference to Policy CS6 and the protection of European designated sites.	the plan should be read as a whole and in the light of other changes proposed as detailed above.
43	N/A		It is recommended that Policy CS6 (Preservation and Enhancement of Natural Assets) incorporates wording to ensure that supporting habitats are protected, maintained and enhanced and that the Council does not permit development that could lead to the loss or	See change 41 above in relation to first recommendation. Revised figures included to cover the second and third recommendations. The last two recommendations can

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			fragmentation of these habitats unless it can be demonstrated that appropriate mitigation is available. Further detail on the types of supporting habitat could be clarified in the supporting text of the policy. • It is recommended that Figure 7 1 (Land won sand and gravels) is amended to illustrate the relationship between the search areas and the European designated site boundaries. The boundary of the search area should be outside of the European site boundaries. Additional text should also be included to ensure no significant adverse effects on European sites. • It is recommended that Figure 7 3 (Potential final Waste Disposal to Land resource Area) is amended to illustrate the relationship between the search area and the European designated site boundaries. The boundary of the search area should be outside of the European site boundaries. Additional text should also be included to ensure no significant	be dealt with separately from the Core Strategy

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason and details of proposed Change
			adverse effects on European sites. - The HRA undertaken for the Allocations and Development Management DPD will be required to include consideration of the potential impacts of waste and minerals allocations and the recommendations of this HRA will need to be incorporated into the DPD. - It is recommended that any future employment development at the Isle of Grain employment site and the Kingsnorth commercial park should remain within the existing boundaries of the employment areas, unless it can be shown that there will be no loss of designated and/ or supporting habitats.	
OTHER PROPOSED CHANGES				
44	N/A	Chapter 1	Various factual changes to reflect the 'submission' status of this version of the Core Strategy and changes in national policy since the previous version was prepared	To ensure the text is relevant
43	N/A	Appendix C	Updated housing and employment trajectories to reflect latest update of Strategic Land Availability Assessment	To ensure the content is up to date



Medway Council Core Strategy



Sustainability Appraisal (incorporating SEA)



Medway Core Strategy Submission Draft



December 2011

enfusion



Sustainability Appraisal (incorporating SEA) - Medway Core Strategy Submission Draft

Medway Council Core Strategy

<i>date:</i>	05 December 2011 FINAL DRAFT FOR CABINET	
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(Available separately)

1. Compliance with SEA Directive and Regulations
2. Summary of Responses to Consultation
3. SA Scoping Report 2009
4. SA of Alternatives

Sustainability Appraisal (incorporating SEA) - Medway Core Strategy Submission Draft

Non- Technical Summary

INTRODUCTION

- 0.1 This is the summary of the Sustainability Appraisal Report for Medway's Local Development Framework (LDF) Core Strategy (draft Submission Document). It describes how the Sustainability Appraisal (SA) process was used to assist in planning for the development and the use of land, as required by planning legislation and Government guidance. The SA assists sustainable development through an ongoing dialogue and assessment during the preparation of LDF Development Planning Documents (DPDs), and considers the implications of social, economic and environmental demands on land use planning.

THE LOCAL DEVELOPMENT FRAMEWORK

- 0.2 The LDF is the planning system introduced by the Planning & Compulsory Purchase Act (2004) and it takes the form of a portfolio of documents including DPDs (Core Strategy, Site Specific Allocations and Area Action Plans), the Statement of Community Involvement, and an Annual Monitoring Report. The Core Strategy sets the LDF's long-term Vision and Strategic Objectives for development planning and it considers the options available through the planning system to the Council and communities in the Medway area. The draft Submission Document sets out the Council's approach, intended to guide future change and development in the area. The Council is also preparing a Site Allocations and Development Management DPD, and a Development Brief for Lodge Hill, Chattenden.

SUSTAINABILITY APPRAISAL & STRATEGIC ENVIRONMENTAL ASSESSMENT

- 0.3 Planning legislation requires that the LDF is subject to a SA, a systematic process that is designed to evaluate the predicted social, economic and environmental effects of development planning. European and UK legislation require that the LDF is also subject to a Strategic Environmental Assessment (SEA), a process that considers the effects of development planning on the environment. Government guidance advises that these two processes should be carried out together and outlines a number of stages of SA work that need to be carried out as the LDF is being prepared:

Stage A: Setting Context & Scope

Stage B: Developing Options & Assessing Effects

Stage C: Preparing the SA Report

Stage D: Consulting on the Plan & the SA

Stage E: Monitoring Implementation of the Plan

- 0.4 The SA/SEA of the Medway Core Strategy Draft Submission Document has been prepared in accordance with these requirements for SA/SEA.

THE CHARACTER OF MEDWAY

- 0.5 Medway is located 30 miles outside of London along the North Kent coast, formed of the five main town centres of Rainham, Gillingham, Chatham, Rochester and Strood, along with the rural Hoo Peninsula and Isle of Grain. It is located within the growth area of the Thames Gateway and also has a number of sites of nature conservation importance, as well as having sites of strategic importance for aggregate importation and power generation.

SA SCOPING & ISSUES FOR SUSTAINABILITY

- 0.6 During 2008 a scoping process for Medway was carried out by Council Officers to help ensure that the SA covered key sustainability issues relevant to Medway. Plans and programmes were reviewed and information was collated relating to the current and predicted social, environmental and economic characteristics of the areas. From these studies, the key sustainability issues and opportunities for the LDF and the SA were identified.

SA Framework

- 0.7 An SA Framework was compiled and included SA Objectives that aim to resolve the issues and problems identified; these are used to test the draft DPDs as they are being prepared. This was included in the SA Scoping Report that was sent to statutory consultees and was refined in accordance with comments received. The SA objectives are listed in the framework below:

Table 0.1: The SA Framework

1	Environment	Conserve and enhance the diversity and abundance of habitats and species
2	Air	Reduce air pollution and improve air quality, including reduction of greenhouse gas emissions
3	Water	Maintain and improve quality of ground and surface waters and security of supply
4	Flooding	Reduce risk of flooding and ensure flood resilience of buildings and minimise the effect on public services and infrastructure
5	Ecological Footprint	Reduce ecological footprint through prudent use of natural resources, reduction in waste and use of sustainable waste management practices
6	Housing	Provide opportunity for everyone to live in a decent, sustainably constructed, affordable home suitable to their needs
7	Previously developed Land	Maximise land use efficiency through appropriate use of previously developed land and existing buildings
8	Health	Improve the health and well-being of the population and reduce health inequalities

9	Poverty/ Social Exclusion	Reduce inequalities in poverty and social exclusion
10	Crime	Reduce crime and the perception of crime
11	Accessibility	Improve accessibility to key services and facilities (inc. countryside, leisure/recreation and historic environment)
12	Material assets, heritage and culture	Conserve and enhance historic buildings, archaeological site and culturally important features and increase engagement by all sections of community
13	Renewable energy	Increase energy efficiency; the proportion of energy generated from renewable sources and the diversity and security of energy supplies
14	Transport	Reduce traffic and congestion by reducing need to travel and improving travel choice
15	Education and workforce	Raise educational achievements through developing opportunities to acquire skills, to develop and maintain workforce
16	Employment	Support and improve employment and economic competitiveness in town centres and deprived areas

SA OF THE CORE STRATEGY

- 0.8 Each stage of the preparation of the Core Strategy was appraised systematically using the SA Objectives. Where significant adverse effects, including environmental effects, have been predicted, the SA sought where possible to identify means of offsetting these effects. Where it was considered that there were opportunities to enhance the sustainability of the proposals, recommendations were made. The appraisal recognised 5 categories of predicted effects, as illustrated in the following key.

Table 0.2: The Appraisal key

✓	Significant benefits
+	Potentially some benefits
0	No effect; benefits/harm will be balanced
-	Potentially some negative effects
x	Not compatible

Appraisal of the Options (SEA Alternatives)

- 0.9 The SEA Directive requires the plan-making body to identify, describe and evaluate the reasonable alternatives to the plan, taking into account the objectives and the geographical scope of the plan or programme. To accompany the July 2009 Core Strategy Issues and Options Report published by the Council, an Initial Sustainability Appraisal was undertaken by Council Officers that considered the sustainability of 5 strategic options.

Appraisal of the LDF Core Strategy Pre-Publication Document November 2010

- 0.10 The development of the Issues and Options, and the subsequent appraisals undertaken, informed the development of the Pre-Publication Core Strategy. This, in turn was subject to detailed SA by Council Officers, and an Interim SA Report was published for consultation in November 2010.

Appraisal of the LDF Core Strategy Publication Document October 2011

- 0.11 Enfusion was contracted to undertake and update the Interim Sustainability Appraisal to accompany the Publication Document on consultation in October 2010. This appraisal updated the previous Interim SA to account for changes made to the document as a result of consultation, the SA and the Habitats Regulations Assessment (HRA) being undertaken by Enfusion in consultation with the North Kent Environment and Planning Group.

Production of the SA Report to accompany the LDF Core Strategy Draft Submission Document

- 0.12 The emerging draft Submission Document was developed in late 2011 to account for changes as a result of consultation, Sustainability Appraisal and the HRA. This final SA report was produced to document the SA process and provide a summary of the SA findings.

Uncertainties

- 0.13 Throughout the development of the draft Submission Document and the Sustainability Appraisal process, data gaps and uncertainties were uncovered. It is not always possible to accurately predict sustainability effects when considering plans at such a strategic scale. Impacts on biodiversity and cultural heritage, for example, will depend on more detailed information and studies at a site-level. And whilst climate change science is becoming more accurate, it is difficult to predict impacts likely to result from climate change, including synergistic effects. These uncertainties have been acknowledged in the appraisal matrices, where applicable.

Significant effects identified

- 0.14 The majority of policies were found to have significant positive sustainability benefits. The following table summarises the key positive effects identified:

Table 0.3: Significant positive effects of the emerging Core Strategy

Key relevant indicator:	Positive effects identified:
Housing	The plan will have significant positive effects through meeting the housing needs of Medway, particularly affordable housing needs, and in locations where housing is most needed.
Economy and employment	The plan will have positive effects for the economic regeneration of existing centres. Development at Lodge Hill will provide additional employment space for higher value jobs to be accommodated.

Water and Soil	The plan maximises the efficient use of land through focussing re-investment/ development on underused, derelict and/ or previously developed land.
Community (equalities)	The plan recognises the needs of Medway's disabled and ageing population and seeks to accommodate those needs, ensuring that housing developments are well designed and are capable of adaptation to accommodate lifestyle changes and to achieve the Lifetime Homes Standard.
Community (crime, income and deprivation)	The plan will have significant positive effects on community cohesion, social inclusion and poverty reduction through the redevelopment of disused areas, which includes the provision of local employment as well as community services and facilities.
Biodiversity, open space and landscape	Redevelopment of underused, derelict and/ or previously developed land will have positive effects on townscape. There is a strong emphasis on the preservation and enhancement of natural assets and the provision of green infrastructure.

Significant negative cumulative effects of plan policies (Intra-plan effects)

- 0.15 Alongside the many positive effects of the plan, significant negative sustainability effects were also identified. These primarily relate to the increased residential and employment development proposed in the plan. Negative effects identified are summarised below:

Table 9.3: Significant negative effects of the emerging Core Strategy

Key relevant SA Objective:	Negative Effects identified:
Air Quality; Biodiversity, open space and landscape; Water and soil and Waste	The cumulative effects of increased development, including housing and employment development include: ■ increased air pollution (local and regional); ■ direct land-take; ■ pressures on biodiversity from increased recreational disturbance & urbanisation; ■ pressures on water resources and water quality; ■ increased noise and light pollution, particularly from traffic; ■ increased waste production; ■ loss of tranquillity ; ■ implications for human health (e.g. from increased pollution); and ■ incremental effects on landscape and townscapes.
Climate Change mitigation and adaptation	An increase in Medway's contribution to greenhouse gas production- this is inevitable given the amount of new development proposed, and includes factors such as increased transportation costs, embodied energy in construction materials and increased energy use from new housing and employment development.

Mitigation and enhancement recommendations

- 0.16 An important role of the SA process is to provide recommendations for the mitigation of negative effects and enhancement of the positive effects identified in the appraisal process. These can then be carried forward in the remainder of the plan-making process and can include further recommendations for other development plan documents (for example Area Action Plans) and for processes including development control and site master planning.
- 0.17 Medway Council has sought, throughout the plan-making process to mitigate the negative effects of development and maximise the opportunities presented, and the draft Submission DPD reflects that commitment. The SA and HRA processes made recommendations throughout the plan's development, which have been considered and where possible, incorporated by the Council.

Monitoring the Implementation of the LDF

- 0.18 Local planning authorities are required to produce Annual Monitoring Reports including indicators and targets against which the progress of the Local Development Framework can be measured. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a Monitoring Strategy that incorporates the needs of the LDF and the SA. Medway Council is preparing a monitoring strategy that will incorporate the recommendations from this SA.

CONCLUSIONS AND NEXT STEPS

- 0.19 The SA of the Core Strategy Submission Document has appraised the effects of individual policies, as well as the overall effect of the plan, including cumulative and incremental effects. The SA has found that the emerging Medway LDF will make a significant contribution to sustainability in the District, with a particularly strong focus on regeneration to meet social and affordable housing needs, enhancing accessibility and protecting the natural environment. The key negative effects identified relate to increased housing and employment development overall, with uncertainty around effects on air quality and increased pressures on water resources and biodiversity. The SA has sought to make further recommendations to assist Council in mitigating the negative effects and enhancing the positive opportunities of this development for the Medway. These recommendations have been considered by the Council and incorporated in the final document, where possible.
- 0.20 This SA report, alongside consultation responses received will form part of the evidence base during the Examination of the Core Strategy and will accompany the adopted DPD when it is published. If any further significant changes are made to the plan the SA Report will be updated accordingly.

1. Introduction

Purpose of the SA and the SA Report

- 1.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Development Documents (LDDs). This requirement is set out in Section 39 (2) of the Planning and Compulsory Purchase Act, 2004 and Planning Policy Statement 12: Local Spatial Planning. Local Development Documents must also be subject to Strategic Environmental Assessment¹² (SEA) and Government advises that an integrated approach is adopted so that the SA process incorporates the SEA requirements.
- 1.2 This is the SA Report that documents the Sustainability Appraisal/Strategic Environmental Assessment processes for the Medway Council Core Strategy Development Planning Document (DPD): Submission Document. The Sustainability Appraisal Framework discussed in Section 3 of this SA Report indicates the relationship between the SA and the SEA; and compliance with the SEA Regulations is signposted below in this section and detailed in Appendix I. This SA Report is being published for consultation with the Core Strategy DPD: Submission Document in accordance with SEA Regulations and SA Guidance.

Sustainability Appraisal

- 1.3 The SA work has been undertaken alongside the development of the Local Development Document (LDD), allowing the SA process to be integrated into the plan-making process and improving the sustainability of the plan throughout the process. Stakeholders and experts are involved throughout the SA process, helping to develop a robust and fully integrated appraisal. This integration will ensure that future development meets the needs of people living and working in an area, whilst at the same time ensuring that it is sited in such a way as to protect the environment.
- 1.4 Previous SA work on the Core Strategy includes:
- In December 2008 a draft Scoping Report was published as a consultation draft. Taking account of all the responses received, a Final Scoping Report was published in April 2009.
 - An initial Sustainability Appraisal was published in July 2009. This assessed the Issues and Options report published at the same time and considered the matters to be covered in the Core Strategy and SA.
 - An Interim Sustainability Appraisal of the Pre-Publication Draft document was published in November 2010, appraising the first full draft of the DPD.
 - An Update to the Sustainability Appraisal was published in August 2011, alongside the Publication Draft Core Strategy.

¹ EU Directive 2001/42/EC

² Environmental Assessment of Plans and Programmes Regulations 2004

- 1.5 These past reports are available on Medway Council's website at:
<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/sustainabilityappraisal.aspx>
- 1.6 This report is structured as follows:
- Section 1: Introduction.
 - Section 2: Short background section summarises the SA process.
 - Section 3: The methodology used throughout the process is described.
 - Section 4: Summarises the approach taken to the assessment of alternatives.
 - Section 5: Provides a summary of the SA findings, incorporating changes made since the publication draft Core Strategy.
 - Section 6-8: Provides a summary of the SA findings to date, considers changes made through the process and summarise the effects for Environmental (section 6), Social (section 7) and Economic (Section 8) topics.
 - Section 9: Includes a summary of transboundary and cumulative effects.
 - Section 10: Discusses the proposed monitoring of the Core Strategy.
 - Section 11: Provides a summary and conclusions.

2. Background

Medway Core Strategy

- 2.1 Medway is located 30 miles outside of London along the North Kent coast, formed of the five main town centres of Rainham, Gillingham, Chatham, Rochester and Strood, along with the rural Hoo Peninsula and Isle of Grain. It is located within the growth area of the Thames Gateway and also has a number of sites of nature conservation importance, as well as having sites of strategic importance for aggregate importation and power generation.
- 2.2 The Medway Core Strategy sets out how the Council sees Medway developing over the period up to 2028. When adopted, the Core Strategy will guide all major development decisions and investment plans. It sets out the overall vision and strategy for the area and will guide the development of further documents in Medway's Local Development Framework, including Allocations and Other Development Management Policies Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).
- 2.3 The Core Strategy sets out the context, options considered, vision and objectives and draft policies based around the following themes:
- Cross Cutting Themes;
 - Housing;
 - Economic Development;
 - Energy Waste and Minerals;
 - Transport and Movement;
 - The River Medway, and
 - Area policies.
- 2.4 The spatial Vision for Medway, as set out in the Core Strategy is provided below:

Spatial Vision for Medway:

By 2028 Medway will have experienced major change. Chatham will be transformed into a city centre for Medway that is also of regional significance. It will be a focus for shopping, leisure and cultural activity and a growing employment location, founded on its first class accessibility, city scale services and associated Higher and Further Education Centre of Excellence. The urban waterfront (north bank: Temple Waterfront to Strood Waterfront; south bank: Rochester Riverside to Gillingham Waterfront) will have been similarly transformed, with mixed-use developments of the highest quality linking the town centres and capitalising on the exceptional setting provided by the river Medway. The established district centres will be the focus for local community life and services, noted for their friendly and high quality environments. Rochester will continue to be recognised as a tourist destination, linked to the many attractions along the urban waterfront. More widely Medway will be recognised as a year round tourist destination with a wide range of quality accommodation, facilities and attractions that celebrate its many historic and natural assets. Easy movement within the urban area will have been achieved through intelligent management of the highway network and parking provision, a network of quality bus corridors linked to park and ride services and high quality

interchange facilities. Movement into and out of the area will have benefited from radically improved rail stations at Strood, Rochester, Chatham and Gillingham. Medway's economy will have grown substantially through the provision of higher value activities and jobs. This will have been achieved by:

- a. Closely aligning skills with the needs of employers and improved levels of educational attainment
- b. Capitalising on the centre of excellence created by our four universities and further education college
- c. Being noted as a location for its communications infrastructure (high speed broadband etc.)
- d. The implementation of reinvestment strategies for each of the established employment areas
- e. Grain, Kingsnorth and Lodge Hill as locations for environmental technologies and building products/construction, amongst other activities and Rochester Airfield as a technology and knowledge hub
- f. Chatham, Gillingham and Strood, along with the major waterfront regeneration sites, as a focus for cultural industries and new office based employment opportunities.

Around 17,930 new homes will have been provided over the period since 2006 through the successful development of the identified waterfront and other urban area development opportunities, plus the new freestanding community at Lodge Hill. Medway will be noted for its high standards of design, fully reflecting sustainability principles and the challenge of climate change through active mitigation and adaptation strategies. This will include being recognised for the way in which its rich historic legacy, including the proposed World Heritage Site, founded on the former Dockyard and its defences, is valued and promoted. Our rural areas will be celebrated for their rich natural assets, contribution to food security and enhanced village environments. The new settlement at Lodge Hill will have been substantially completed and recognised as a beacon of best practice in terms of its design and sustainability. It will provide a new focus for services on the Hoo Peninsula, while retaining the essentially rural and locally distinctive character of the area and relating sensitively to nearby villages. The extensive and numerous inner urban and suburban communities will be noted for their greenspaces and thriving neighbourhood centres providing local access to services through community hubs. Deprivation will have been greatly reduced through effective intervention strategies for target neighbourhoods and the development of local opportunities in line with the development of sustainable neighbourhoods. The area will be recognised for the way in which everyone has benefited from the large-scale physical regeneration and the way in which change has reflected the social, economic and environmental needs of the area. Healthy lifestyles will have been actively promoted through intelligent design, enhanced opportunities for sport and recreation and the promotion of walking and cycling. The River will be celebrated as the dominant and unifying geographical feature of the area through enhanced riverside walks and sensitive balancing of its commercial, leisure and environmental potential. The area will be widely recognised for its contributions to the nation's energy infrastructure, its port capacity and its gateway function for the importation of minerals and other materials.

- 2.5 In taking this vision forward the Core Strategy outlines the following strategic objectives to guide development and other planning decisions:

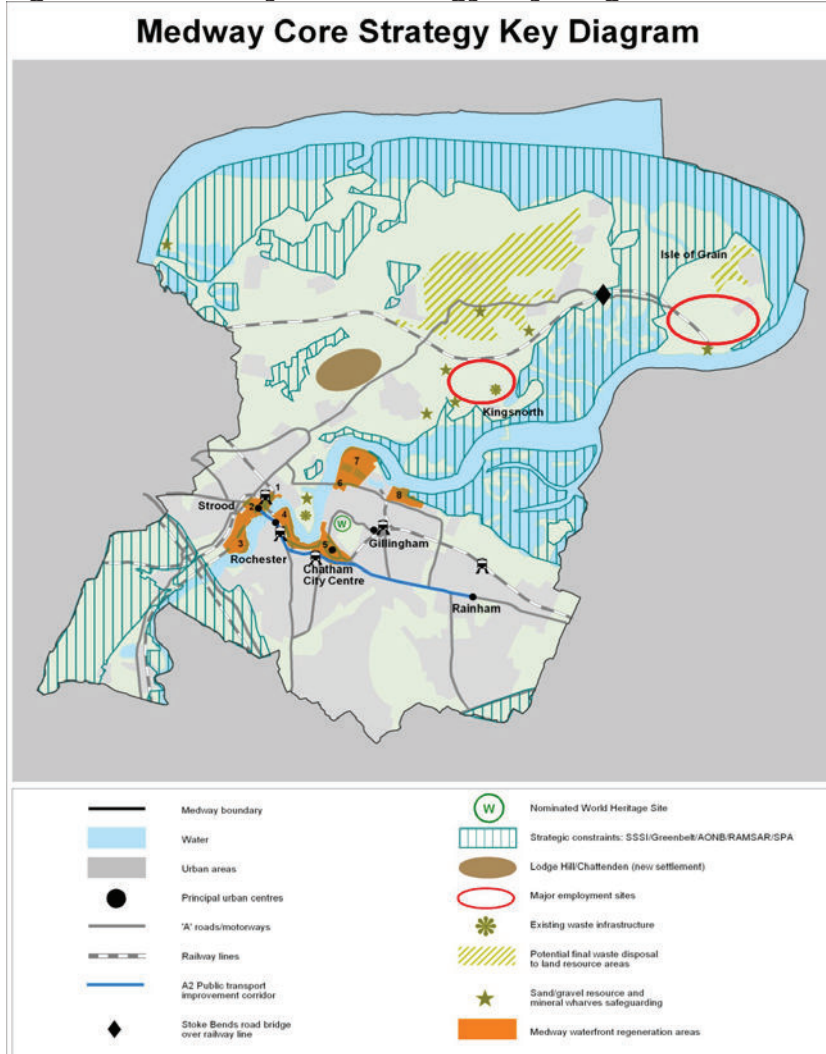
Core Strategy Strategic Objectives

1. To effectively realise Medway's role within the Thames Gateway and associated growth requirements primarily through effective physical regeneration, the reuse of previously developed land and the protection and enhancement of the area's many natural and heritage assets.
2. To develop Chatham as a city centre of regional significance with its role complemented by thriving and attractive traditional town centres in Strood, Rochester, Gillingham and Rainham together with a network of strong neighbourhood centres serving local communities.
3. To substantially improve the performance of the local economy, in particular by nurturing higher value activities and reducing the current reliance on out commuting.
4. To focus economic and employment growth in Chatham Centre, within the major mixed use regeneration sites, through re-investment within the established employment areas and at Rochester Airfield, Lodge Hill, Kingsnorth and Grain.
5. To maximise the development opportunities associated with the four Universities and Further Education College to create a centre of excellence of national significance.
6. To radically improve the quality of the townscape and public realm within the central urban area and along the urban waterfront.
7. To boost the range and quality of tourist accommodation and positively promote visitor destinations.
8. To significantly reduce deprivation in Medway, including through the implementation of tailored strategies for target neighbourhoods and the development of a network of strong neighbourhood centres, providing a range of local services and acting as community hubs.
9. To ensure that there is sufficient housing to meet people's needs by providing for a range, mix, type and affordability of housing in locations that contribute to the regeneration and sustainability of the area.
10. To provide for the transport needs of the population through the provision of enhanced public transport facilities, proactive management of the highway network and improved facilities for walking and cycling.
11. To enhance the quality of life of local people through the promotion of healthier lifestyles and the provision of improved cultural, sporting, leisure and tourism facilities, including along the river Medway.
12. To nurture Medway's rural areas and economy, including through village improvement projects, enhanced land management and local access strategies.
13. To make the new settlement at Lodge Hill a model for modern living, exhibiting the highest standards of design and sustainability and complementing existing villages on the Hoo Peninsula.
14. To work proactively to minimise the effects of climate change through efficient resource use, high quality buildings, improved biodiversity, the effective management of open land and other mechanisms.

15. To ensure that there is sufficient minerals and waste management/disposal capacity to meet local requirements and contribute to regional and national needs.
16. To ensure the provision of necessary infrastructure to match the needs of development at the right time and in the right place.

- 2.6 The Core Strategy proposes the construction of approximately 17,930 new homes and 935,995 sq m of employment floorspace (accommodating up to 21,500 additional jobs) up to the year 2028. A key component of housing supply will be the large waterfront regeneration sites within the main urban area and a new settlement at Lodge Hill. The development strategy is summarised in the Core Strategy Key Diagram provided below:

Figure 2.1: Medway Core Strategy Key Diagram



Summary of Compliance with the SEA Directive & Regulations

- 2.7 The SEA Regulations set out certain requirements for reporting the SEA process, and specify that if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process, as for the SA of the Medway LDF), then the sections of the SA Report that meet the requirements set out for reporting the SEA process

must be clearly signposted. The requirements for reporting the SEA process are set out in Appendix I.

Habitats Regulations Assessment

- 2.8 The Conservation of Habitats and Species Regulations 2010 (as amended 2011) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance.
- 2.9 There are three European sites with the plan area and three further sites in the surrounding area that lie within the potential influence of the plan.

European Sites within the Medway area

- Medway Estuary & Marshes SPA/Ramsar
- North Downs Woodlands SAC
- Thames Estuary & Marshes SPA/Ramsar

European Sites outside the Medway area

- Peters Pit SAC
- Queendown Warren SAC
- The Swale SPA/Ramsar

- 2.10 The first stage of the HRA process (screening) considered the likely significant effects of the Pre-Publication Draft Core Strategy on the six European sites. The screening concluded that the potential effects of the Plan on the six European sites was uncertain through reduced air quality; reduced water levels and quality; increased disturbance and habitat fragmentation and loss. Based on the precautionary approach these issues were progressed through to the Appropriate Assessment (AA) stage to be considered in more detail.
- 2.11 The AA considered the potential for the Core Strategy (both alone and in combination) to have adverse effects on the integrity of European sites through the issues identified above. The AA concluded that the Core Strategy would not have adverse effects on the integrity of European sites either alone or in combination provided that the recommendations made by the AA are incorporated into the Plan. The detailed findings of the assessment process, including recommendations for avoidance and mitigation measures are set out in the separate HRA (AA) Report for the Submission Draft Core Strategy.

3. Appraisal methodology

- 3.1 This section provides an explanation of the SA method followed in the preparation of the Medway Core Strategy. Government guidance outlines a number of stages of SA work that need to be carried out as the LDF is being prepared:

Stage A: Setting Context & Scope (Scoping)
Stage B: Developing Options & Assessing Effects
Stage C: Preparing the SA Report
Stage D: Consulting on the Plan & the SA
Stage E: Monitoring Implementation of the Plan

SA Scoping

- 3.2 SA Scoping involves the following tasks:

- Task A1: Identifying other relevant plans, programmes and sustainability objectives;
- Task A2: Collecting baseline information;
- Task A3: Identifying sustainability issues;
- Task A4: Developing the SA framework; and
- Task A5: Consulting on the scope of the SA.

- 3.3 An SA Scoping process was undertaken by Medway Council Officers in 2008 to help ensure that the SA covers the key sustainability issues that are relevant to spatial and development planning in Medway. This included: the identification of relevant plans, programmes and sustainability objectives; the collation of relevant baseline information; the identification of sustainability issues and the development of an SA Framework of objectives (presented later in this section of the SA Report) to comprise the basis for appraisal. An SA Scoping Report was prepared to summarise the findings of the scoping process and this was published in 2008 for consultation. Responses to this scoping consultation, and how they were taken into account, are reported in this SA Report. The scoping report, provided at Appendix 3 includes a detailed summary of the methodology and results of this process.

- 3.4 The baseline information in the scoping report is arranged under the following topics:

- Community (population, crime, deprivation, health)
- Economy and employment
- Cultural Heritage and Material Assets
- Housing
- Biodiversity and open space
- Air quality
- Water and Soil
- Waste

- Transport and accessibility
 - Climate adaptation and mitigation
- 3.5 Additional information collected since then and an explanation of how development in the area would progress without the Core Strategy is provided in Sections 6, 7, and 8 of this SA report.

Alternatives assessment

- 3.6 Alongside the Issues and Options Report, which was consulted on in July 2009, an Initial Sustainability Appraisal was undertaken by Council Officers that considered the sustainability of 5 strategic options. This work meets the requirements of the following SA tasks:
- B1: Testing the DPD objectives against the SA framework; and
 - B2: Developing the DPD options.
- 3.7 The method and results of this assessment are explained in Section 4 of this report, with further information included at Appendix 4. The full Interim Sustainability Appraisal Report is available at:
<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/sustainabilityappraisal.aspx>

SA of Pre-Publication Draft Core Strategy

- 3.8 The assessment of issues and options was followed by Council Officers undertaking a Sustainability Appraisal of the Pre-Publication Draft Core Strategy in November 2010, which appraised the first full draft of the DPD. The assessment of the SA of the Pre-publication Draft Core Strategy has contributed to the overall assessment included within sections 5-8 of this report. The full Sustainability Appraisal is available at:
<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/sustainabilityappraisal.aspx>

SA Review

- 3.9 In June 2011 Enfusion prepared a Critical Friend/Compliance review of the previous SA work undertaken by Medway. The review found that overall the three SA Reports are well written and presented in an understandable style that is engaging for both the professional and public. The review included a number of suggestions for improvement that could be incorporated into the remainder of the SA work to ensure compliance with the SEA Directive and to uphold good SA practice. In particular it recommended a more detailed approach to the assessment of cumulative effects arising from the Core Strategy.

SA Workshop

- 3.10 On 29 June, Enfusion held a workshop with Officers of Council's Planning Policy service to discuss the sustainability implications of the Medway Core Strategy. At the workshop, staff explored some of the key issues facing

Medway including climate change/energy efficiency, health and transport and considered further opportunities for mitigation of the plan's negative effects. Following the workshop further follow-up advice was provided in relation to improving particular policies.

SA of Publication Core Strategy

- 3.11 Enfusion undertook an updated Sustainability Appraisal. This report considered the Publication draft Core Strategy, published in October 2010 and provided an updated appraisal where circumstances or policies have changed. A detailed Cumulative Effects appraisal was undertaken, considering both effects from within the plan (intra-plan) and in-combination with other plans (inter-plan). It also considers in more detail consultation responses received on the SA of the Pre-publication Draft Core Strategy. The appraisal is included in Sections 5-8 of this report, and updated, as appropriate to account for consultation comments and minor changes to Core Strategy policies since the SA was undertaken.

SA of draft Submission Core Strategy

- 3.12 Further minor changes were proposed to the Core Strategy (as a result of consultation and the SA and HRA processes). This final SA report updates the previous appraisal and documents the overall SA process. It will accompany the Submission version of the Core Strategy on consultation and will be submitted to the Planning Inspectorate as part of the evidence base for the Core Strategy.

Appraisal Methods:

The Sustainability Appraisal Framework

- 3.13 The appraisal was undertaken using professional judgement, supported by the baseline information contained in the SA Scoping report and additional information sources available. . The SA Framework used throughout the Sustainability Appraisal work is reproduced below:

Table 3.1: The SA Framework

1	Environment	Conserve and enhance the diversity and abundance of habitats and species
2	Air	Reduce air pollution and improve air quality, including reduction of greenhouse gas emissions
3	Water	Maintain and improve quality of ground and surface waters and security of supply
4	Flooding	Reduce risk of flooding and ensure flood resilience of buildings and minimise the effect on public services and infrastructure
5	Ecological Footprint	Reduce ecological footprint through prudent use of natural resources, reduction in waste and use of sustainable waste management practices

6	Housing	Provide opportunity for everyone to live in a decent, sustainably constructed, affordable home suitable to their needs
7	Previously developed Land	Maximise land use efficiency through appropriate use of previously developed land and existing buildings
8	Health	Improve the health and well-being of the population and reduce health inequalities
9	Poverty/ Social Exclusion	Reduce inequalities in poverty and social exclusion
10	Crime	Reduce crime and the perception of crime
11	Accessibility	Improve accessibility to key services and facilities (inc. countryside, leisure/recreation and historic environment)
12	Material assets, heritage and culture	Conserve and enhance historic buildings, archaeological site and culturally important features and increase engagement by all sections of community
13	Renewable energy	Increase energy efficiency; the proportion of energy generated from renewable sources and the diversity and security of energy supplies
14	Transport	Reduce traffic and congestion by reducing need to travel and improving travel choice
15	Education and workforce	Raise educational achievements through developing opportunities to acquire skills, to develop and maintain workforce
16	Employment	Support and improve employment and economic competitiveness in town centres and deprived areas

The Appraisal Key:

- 3.14 The definitions used to categorise the impacts identified in the appraisal are explained in the following key:

✓	Significant benefits
+	Potentially some benefits
0	No effect; benefits/harm will be balanced
-	Potentially some negative effects
x	Not compatible

- 3.15 In addition it was considered whether the potential impacts were likely to occur in the short, medium or long term. Due to the length of the plan period, at 15 years, these correlated to the following 5-year bandings:

- Short-term 0-5 years
- Medium term 5-10 years
- Long term 10-15 years

Assumptions, data gaps and uncertainties

- 3.16 Throughout the development of the Core Strategy and the SA process, data gaps and uncertainties were uncovered. It is not always possible to accurately predict sustainability effects when considering plans at such a strategic scale. Impacts on biodiversity and cultural heritage, for example, will depend on more detailed information and studies at a site-level. And whilst climate change science is becoming more accurate, it is difficult to predict impacts likely to result from climate change, including synergistic effects. These uncertainties have been acknowledged where applicable through the appraisal.

Discussion Categories

- 3.17 Many of the sustainability issues identified are cross-cutting in nature. To take account of this they have been grouped under the following categories:

Environmental:

- Air quality
- Water and Soil
- Waste
- Biodiversity and open space
- Climate adaptation and mitigation

Social:

- Community (population, crime, deprivation, health)
- Cultural Heritage and Material Assets
- Transport and accessibility
- Housing

Economic:

- Economy, education and employment

Consultation

- 3.18 Throughout the SA process, consultation with stakeholders and the wider public has helped to inform the appraisal.
- 3.19 The key sustainability issues were identified through the SA scoping process that was placed on consultation in 2008. The consultation comments received on the SA Scoping report then helped to inform the continuing appraisal work, including the Issues and Options, which in turn was published for consultation in July 2009.
- 3.20 The SA and the consultation helped to determine the preferred overall spatial strategy and preferred options, which were published in the Pre-Publication Draft Core Strategy, placed on public consultation with an Interim Sustainability Appraisal in November 2010. Responses received to both the

Core Strategy and SA consultation were then considered further in the Update to the Interim Sustainability Appraisal, which notably included an analysis of cumulative effects.

- 3.21 Further consultation comments received on the Update to the Interim Sustainability Appraisal were considered in the production of this current SA report. A detailed account of the consultation responses received throughout the process SA has been prepared, including how the SA has taken into consideration these comments. This can be found at Appendix 2.
- 3.22 This Sustainability Appraisal Report is being published alongside the Core Strategy Submission Document, in accordance with SEA Regulations and SA Guidance. It will be published on the Council's website www.medway.gov.uk and sent to statutory consultees and other relevant stakeholders.

Compatibility of Core Strategy Spatial Vision and Strategic Objectives

- 3.23 A compatibility analysis of the Core Strategy vision and objectives was undertaken in the Interim SA. The Vision and each Core Strategy objective were considered for their compatibility with the full SA Framework of objectives. This was then updated to account for the 2 new objectives added to the Core Strategy Publication Core Strategy:
- New objective 7: To boost the range and quality of tourist accommodation and positively promote visitor destinations
 - New objective 16: To ensure the provision of necessary infrastructure to match the needs of development at the right time and in the right place.
- 3.24 The Core Strategy 'Spatial' Vision has been found to positively progress the majority of SA objectives, particularly against those relating to housing, communities and the economy. Given the level of development proposed (17,930 new homes), the 'Spatial' Vision is considered to not be compatible with SA objectives relating to biodiversity, air and water, due to the potential for increasing pressure on these resources. The SA has made recommendations for changes to the more detailed policies to minimise the this pressure through appropriate mitigations.
- 3.25 The matrix overleaf shows the updated compatibility matrices between the Core Strategy strategic objectives and the SA framework.

Table 3.2: Compatibility Matrix of the Strategic and Sustainability Objectives

Strategic Objectives	SA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	biodiversity	air	water	flooding	Environmental footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable Energy	transport	Education and workforce	Economy
2																
3																
4																
5																
6																
7																
8																
9																
10																
11																
12																
13																
14																
15																
16																

Key to matrix

	Compatible
	Slightly compatible, expected more benefits
	No effect; benefits may balance harm
	Slightly compatible, but expected more harm
	Not compatible

- 3.26 The majority of strategic objectives are assessed as either having no effect (neutral) or being compatible against SA objectives. Strategic objectives that propose the regeneration of Medway are compatible with SA objectives relating to housing, employment, communities and use of previously developed land. However these strategic objectives are also considered to not be compatible with SA objectives relating to biodiversity, air quality and water.

4. Appraisal of the alternatives

- 4.1 The EU SEA Directive requires that a report shall be prepared "*...in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*" (Article 5 (1)). Information to be included in the report includes "*an outline of the reasons for selecting the alternatives dealt with*" (Annex I (h)). Whilst the SEA Directive does not define what a reasonable alternative is, UK practical guidance on SEA³ and SA/SEA⁴ advises that "realistic" alternatives should be considered.
- 4.2 This section of the SA Report therefore seeks to provide a clear summary of the alternatives considered throughout the SA process and the reasons for selecting/rejecting those alternatives. The original SA of the alternatives can be found in the SA of the Issues and Options Report (July 2009) and is reproduced at Appendix 4.
- 4.3 The appraisal of alternatives focused on the potential for 5 broad locations to accommodate growth outside of the existing urban boundaries. A 'Call for sites' was carried out from December 2008 till January 2009, as part of the Medway Strategic Land Availability Assessment (SLAA) and as a result of this a number of sites were put forward. These tended to fall within a number of broad locations and were considered accordingly. This also allowed an objective assessment to be made by comparison with the proposed settlement at Lodge Hill, Chattenden. This was both to see whether another location may be more suitable than Lodge Hill and also to test whether the same scale of development could be achieved elsewhere.
- 4.4 The key spatial alternatives in relation to the location of new development (primarily housing and employment development) are described below:

Option 1: New settlement at Lodge Hill, Chattenden

The new settlement at Lodge Hill would be freestanding and use mainly previously developed land with circa 5,000 homes and a full range of associated services being provided. This option would not require any extension to existing urban boundaries.

Option 2: Expanded Hoo

This option reflects the fact that a number of landowners/developers have proposed sites for development on the edge of each of the settlements referred to below. This option would effectively substitute Lodge Hill with further expansion at Hoo St. Werburgh and at the nearby villages of High Halstow and Cliffe Woods.

³ ODPM 2005 A Practical Guide to the SEA Directive
<http://www.communities.gov.uk/publications/planningandbuilding/practicalguidesea>
⁴ PAS 2010 Sustainability Appraisal Advice Note <http://www.pas.gov.uk/pas/aio/627078>

Option 3: Capstone Urban Extension

This option involves a major urban extension into the Capstone Valley between Hempstead and Lordwood. For this options appraisal an area wholly within the Medway boundary was considered, bridging the valley in a 'U' shaped configuration. This would generally be to the south of the Capstone Country Park. However, were it to proceed, development would be likely to extend further southwards into Maidstone, resulting in development on a scale that would be substantially larger than that proposed at Lodge Hill.

Option 4: East of Rainham Urban Extension

This option would involve development between the existing urban boundary and the administrative boundary with Swale Borough. It envisages the majority of any development area being to the south of the A2 but with some development, around Moor Street, to the north.

Option 5: North of Rainham Urban Extension

This option envisages the release of land between the current urban boundary and the B2004 Lower Rainham Road. It would potentially extend from the Gillingham Link Road (A289) in the west to the administrative boundary with Swale in the east.

Reasons for selecting or rejecting the alternatives & consideration of other alternatives

- 4.5 The reasons for selecting or rejecting the spatial alternatives are detailed in Appendix 4 and summarised as follows.
- 4.6 The new settlement at Lodge Hill, Chattenden was considered to be the most sustainable of the 5 options as it would make the greatest contribution overall to sustainability. Other reasons given by the Council for selecting this site are that it has been identified previously as an area with the potential for development (The Medway Local Plan, South East Plan), and that it is located on Previously Developed Land.
- 4.7 Whilst the other spatial options (apart from Capstone) were considered to make a reasonable contribution towards achieving the sustainability objectives (at least in the short term), Lodge Hill was considered to make the greatest contribution to sustainability in the long term.
- 4.8 Consideration of spatial options beyond those outlined above was considered to be limited due to the number of decisions on the location of development that had already been made, including planning permissions that have already been granted and where the way forward had been set in other plans. This includes the imperative for development on previously developed land, as set by central government policy. The focus on regeneration of existing areas (outside of the development of one new major growth area at Lodge Hill) also reflects the area's location within the Thames Gateway and its associated regeneration strategy.

The Council considered that not proceeding with the development of a new settlement (or sizeable urban extension) outside of the earmarked regeneration sites was not a realistic or reasonable option. This is because the development of the new settlement is considered vital to the economic and social development of Medway through helping to meet affordable and market housing needs and providing housing choice, improving its 5 year land supply and providing opportunities for employment and economic development in the district. Again, the identification of the new settlement in the South East Plan and Local Plan and location on Previously Developed Land were driving factors.

- 4.9 It was identified that there were other alternatives available to Council in the consideration of plan options that relate to other non-residential development types: namely the location of waste and minerals development, retail and community facilities. The consideration of alternatives for these development types are detailed in Appendix 4.

Other alternatives considered and why they were discounted

- 4.10 In preparing the Core Strategy, the Council has considered the implications of both higher and lower targets than the 815 per annum proposed. The annual target of 815 completions (net) over the whole plan period (2006 – 2028) equates to 17,930 over the period, a figure that is in conformity to the SE Plan.
- 4.11 A small number of respondents to the Publication Draft Core Strategy and its SA have queried why the Council has not sought to undertake an appraisal of options relating to the level of growth proposed in the Core Strategy. The following text explains why neither a higher or lower target are considered to be reasonable or realistic options:
- The identified pipeline of sites is greater than the target (20,943 [19,439 up to 2028] v 17,930) but some key regeneration sites are difficult in terms of delivery. To meet the 815 dwellings per annum, as proposed will require a sustained level of delivery greatly exceeding the historic trend in Medway. Therefore a higher target is not realistic on delivery grounds, particularly given current economic conditions.
 - For similar reasons a lower target is also considered unrealistic. Apart from the sheer size of the pipeline a high proportion of this capacity already has planning permission or an adopted development brief in place. The only practical option for reducing housing figures would be to remove Lodge Hill from the Core Strategy. However, this development is of such a scale that it would, by itself result in a reduction in housing of around a third over the plan period. This is not considered reasonable given Government exhortations to increase house building and the fact that Lodge Hill has been endorsed in every plan prepared since 1995. It would also be contrary to the regeneration objectives for the Thames Gateway and would result in the delivery of less affordable and social homes and would mean that the plan would no longer be in conformity with the housing targets set out in the South East Plan.

5. Appraisal Summary

- 5.1 This section includes the appraisal of individual policies within the Core Strategy. Originally undertaken for the SA of the pre-publication draft, the table has been updated to incorporate changes made to the policies for the Publication and Submission DPDs (highlighted in **RED**) and changes made as an update to the appraisal (e.g. resulting from further consideration of cumulative effects) (changes in **BLUE**).
- 5.2 As mentioned within the earlier section on methodology, the following symbols have been used within the matrices.

✓	Significant benefits
+	Potentially some benefits
0	No effect; benefits/harm will be balanced
-	Potentially some harm
x	Not compatible

- 5.3 The matrices summarise the appraisal provided in chapters 6-8, where the effects of the plan are considered in detail against environmental, social and economic topics.

Cross-cutting Matrix

Policy	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
biodiversity		air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	transport	Education and workforce	Economy
CS1: Regenerating Medway	0	-	-	0	0	✓	✓	+	+	0	+	0	0	-	✓	✓
CS2: Quality and Sustainable Design	0	0	+	0	+	✓	✓	0	+	0	0	+	0	+	✓	✓
CS3: Mitigation and Adaptation to Climate Change	+	0	+	0	✓	+	0	0	0	0	✓	0	0	0	0	0
CS4: Energy Efficiency and Renewable Energy	0	0	0	0	✓	0	0	0	+	0	+	0	✓	0	✓	✓
CS5: Development and Flood Risk	-	0	0	✓	0	+	0	+	+	0	+	0	+	0	0	0
CS6: Preservation and enhancement of Natural Assets	✓	0	0	+	✓	0	0	+	0	0	0	✓	0	0	0	0
CS7: Countryside and Landscape	+	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0
CS8: Open Space, Green Grid and Public Realm	0	0	0	0	0	0	0	✓	✓	✓	✓	+	0	+	0	0
CS9: Health and Social Infrastructure	0	+	+	0	0	0	+	✓	✓	0	✓	✓	0	0	0	+
CS10: Sport and Recreation	-	0	0	0	0	0	✓	✓	0	0	✓	✓	0	0	+	+
CS11: Culture and Leisure	0	0	0	0	0	+	✓	0	+	0	0	✓	0	0	✓	✓
CS12: Heritage Assets	0	0	0	0	0	+	✓	0	+	0	0	✓	0	0	✓	✓

Housing Chapter Matrix

Policy	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
CS13: Housing Provision and Distribution	-	-	-	0	-	✓	✓	+	✓	+	✓	0	+	-	+	+
CS14: Affordable Housing	0	0	0	0	-	✓	✓	+	✓	+	✓	0	0	0	+	+
CS15: Housing and Other Housing Requirements	0	0	0	0	-	✓	✓	✓	✓	+	✓	0	✓	0	+	+
CS16: Gypsies, Travellers and Travelling Showpeople	0	0	0	0	-	✓	✓	0	✓	0	✓	0	0	0	+	+

Economy Chapter Matrix

Policy	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
CS17: Economic Strategy	-	-	-	0	-	✓	✓	✓	✓	0	✓	+	✓	-	✓	✓
CS18: Tourism	0	0	0	0	0	+	✓	0	+	0	0	+	+	-	✓	✓

		SA Objective															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Policy		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
CS19: Retail and Town Centres	biodiversity	0	0	0	0	0	+	✓	0	✓	0	✓	0	0	transport	Education and workforce	Economy
CS20: Education and Personal Development		+	0	0	0	0	+	✓	+	✓	0	0	+	+	-	✓	✓

Energy, Waste and Minerals Chapter Matrix

		SA Objective															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Policy		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
CS21: Conventional Energy	biodiversity	0	-	0	0	0	✓	✓	0	✓	0	✓	0	✓	-	✓	✓
CS22: Minerals Provision		-	0	-	0	0	+	0	0	✓	0	0	0	+	-	✓	✓
CS23: Waste Management		0	0	0	0	✓	+	✓	0	+	0	+	0	✓	-	✓	✓

Transport and Movement Chapter Matrix

Policy	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	transport	Education and workforce	Economy
CS24: The River Medway	-	-	0	0	0	+	✓	+	+	0	✓	+	0	✓	+	+

River Medway Chapter Matrix

Policy	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	transport	Education and workforce	Economy
CS25: The River Medway	✓	0	✓	0	✓	0	0	+	0	0	+	✓	0	+	+	+

Area Policies Chapter Matrix

Policy	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	transport	Education and workforce	Economy
CS26: Strood	-	-	-	0	-	✓	✓	0	+	+	0	+	0	0	✓	✓
CS 27: Rochester	-	-	-	0	0	+	✓	0	0	0	0	+	0	+	✓	✓
CS28: Chatham	-	-	-	0	+	+	✓	0	✓	✓	✓	0	0	0	✓	✓
CS29: Gillingham	-	-	-	0	+	0	✓	0	+	0	0	+	0	0	✓	✓
CS30: Rainham	-	-	-	0	+	0	✓	+	+	0	+	0	0	0	0	✓
CS31: Hoo Peninsula and the Isle of Grain	-	-	-	0	0	+	✓	+	+	+	✓	0	0	0	✓	✓
CS32: Medway Valley	-	-	-	0	0	+	✓	+	+	0	✓	+	0	0	+	✓
CS33: Lodge Hill	-	-	-	+	+	✓	✓	0	✓	0	+	✓	✓	+	✓	✓

Monitoring, Implementation and Review Chapter Matrix

Policy	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
CS34: Implementation of the Core Strategy	0	0	0	0	0	✓	0	0	0	0	✓	0	0	0	0	✓
	0	0	0	0	0	0	0	0	0	0	✓	0	0	0	0	0

6. Appraisal of the Publication Draft Core Strategy policies against the Environmental Indicators

- 6.1 This section provides a summary of the SA findings presented in section 5, ordered in accordance with environmental, social and economic topics. For each topic, the findings of previous SA work are summarised, followed by an appraisal of significant changes made since the SA of the Pre-Publication Draft took place in November 2010. A commentary on the overall effects of the plan on each topic is then provided. This commentary helps to illustrate the iterative nature of plan-making and SA, and how the SA has assisted in improving the sustainability of the Core Strategy.

Air quality

Updated context & situation without the Core Strategy

- 6.2 Background air quality⁵, namely nitrogen dioxide (NO₂) concentrations have remained relatively stable in Kent since the mid-2000's. In 2010 the general trend at the background monitoring sites across the survey area was an overall reduction in NO₂ concentrations. A number of monitoring sites showed a slight increase at the end of 2010 reflecting an increase in NO₂ concentration seen during the cold weather experienced across the UK in December.
- 6.3 A proportion of the particulate matter present in Kent is from non-local sources, most significantly London and mainland Europe. This results in relatively high background and rural concentrations of particulate matter (PM₁₀) across Kent. The non-local origins of this particulate matter mean that it is difficult to achieve a significant reduction in ambient concentrations at a local level. The Annual report for the Kent and Medway Air Quality Monitoring Network identified that the PM₁₀ concentrations at the automatic monitoring sites remained relatively constant over the period 1998 to 2007. Between 2008 and 2010 there was some variation in the rolling annual mean concentration however there is a general downward trend in concentrations at almost all of the monitoring sites.
- 6.4 Locally, nitrogen dioxide (NO₂) is the only pollutant that exceeds national air quality objectives within Medway⁶. For Medway Local Authority, the SA Scoping report (Appendix 3) refers to 6 Air Quality Management Areas where exceedances occur; however these were revoked in 2010 and replaced with 3 consolidated AQMAs⁷. The new AQMAs are:

⁵ As reported in The Annual Report (2010) for the Kent and Medway Air Quality Monitoring Network

⁶ The Environment Act, 1995 places a statutory duty on local authorities to periodically undertake an air quality review and assessment of their area against health based air quality objectives set out in the Government's Air Quality Strategy. In areas where air quality objectives are not likely to be met, local authorities must declare an Air Quality Management Area (AQMA) and develop an action plan in pursuit of the air quality objectives.

⁷ For further information and maps refer to 2010 Air Quality Progress Report for Medway Council
<http://www.medway.gov.uk/environmentandplanning/environmentalhealth/airquality.aspx>

- A large central Medway AQMA which includes the existing AQMAs of Frindsbury Road, Cuxton Road, Strood Centre, Rochester Centre and Chatham Centre but also includes the new areas of Luton Road, Chatham, High Street, Chatham and Chatham Hill, Chatham
- A smaller AQMA along High Street, Rainham
- A smaller AQMA at Pier Road, Gillingham

Findings of the SA (Pre-Publication Draft)

- 6.5 The SA of the Pre-Publication Draft noted that the main areas likely to be affected by increased emissions will be the key areas for new development; i.e. the urban waterfront and in/around the town centres. The proposed development at Lodge Hill, alongside economic development at the Hoo Peninsula will also lead to increased traffic on the peninsula.

What has changed and how does this affect the SA?

- 6.6 There have been minor changes to Core Strategy Policies with regard to air quality, which includes some additional references with regard to minimising air pollution (e.g. in Policy CS 25: The River Medway) and increasing bus services which will help towards mitigation. Mitigation is proposed in CS policies, in particular CS 24: Transport and Movement, although it is recommended that the approach to lower parking standards could be strengthened, provision made for electric vehicles and a requirement for green travel plans included. The HRA has also considered the cumulative effects of possible increased emissions on designated biodiversity sites, which has been raised as a possible area of concern.

Updated overall assessment and cumulative effects

- 6.7 Overall, the growth proposed in the Core Strategy will lead to increased atmospheric pollution (local and regional) as a result of increased traffic, embodied energy in construction materials and increased energy use from new housing and employment development. The construction of new development can also lead to direct effects on air quality (dust, equipment and vehicular emissions), although these are carefully regulated through development controls/ site management measures. The development of the Medway Waterfront Regeneration Areas and Lodge Hill has the potential for cumulative negative effects on air quality and consequently impacts on human health and biodiversity (although the HRA determined that significant effects on designated sites was unlikely). These developments are likely to increase traffic on key A- roads, including the A289 (which incorporates part of the Gillingham AQMA and the High Street Rainham AQMA), the A2 (incorporating the Central Medway AQMA) and through the District and into neighbouring Districts, especially Garvesham. The implications for these Air Quality Management Areas will need to be closely monitored.
- 6.8 The Core Strategy contains mitigation measures - including Policies CS3 (Mitigation and Adaptation to Climate Change), CS4 (Energy Efficiency and Renewable Energy) & CS24 (Transport and movement) - which will help to minimise this effect through balancing car travel with greater use of public

transport. This includes measures to proactively manage the highway system to minimise congestion, improving public transport services (fast track style services, improved transport interchanges and main line rail and real time transport information and integrated ticketing. Other measures include rationalisation of car parking, the introduction of park and ride facilities and the expansion of walking and cycling networks and water based transport). The area-based policies for Strood (CS26), the Hoo Peninsula (CS 31), the Medway Valley (CS 32) and Lodge Hill (CS 33) all seek to encourage public transport or walking/cycling- Lodge Hill has particularly strong requirements for minimising vehicular transport.

- 6.9 Notwithstanding these policy measures, the Council will need to maintain a firm approach to transport for new development throughout the preparation of further plans (Site Allocations and Development Management DPD, Development briefs) and in the assessment of individual development applications. Air quality will require ongoing monitoring, with aversive action required should acceptable standards be exceeded.

Water and Soil

Updated context & situation without the Core Strategy

- 6.10 At present 76% of the water to the Medway area is supplied from local groundwater sources with the remainder (24%) from surface water sources outside the area. There are 34 groundwater sources and 1 surface water source within the local area. Average annual demand within the Kent Medway Water Resource Zone⁸ (WRZ) will increase given the level of growth proposed within the Kent Medway WRZ itself and surrounding areas.
- 6.11 River water quality in Medway is currently assessed as having moderate ecological quality. Groundwater is assessed having good chemical quality with poor chemical quality in certain areas. The Medway and Thames Estuaries are both assessed as having moderate ecological quality and poor chemical quality.
- 6.12 The soil quality throughout the Medway area varies widely, with pollution on old industrial sites that are no longer in use and also areas of Grade I agricultural land.

Findings of the SA (Pre-Publication Draft)

- 6.13 The SA of the Pre-Publication Draft identified the potential for negative effects on soil through minerals workings, especially in the area to the east of Hoo St. Werburgh. Policy CS7: Countryside and Landscape seeks to protect the best and most versatile agricultural land on the Hoo Peninsula, outside of the Lodge Hill strategic allocation, in the Capstone and Medway Valleys and to the North and East of Rainham. The key sustainability issues relating to water

⁸ According to Southern Water's figures average annual demand within the Kent Medway Water Resource Zone (WRZ) is 111.97 Megalitres per day (ML/d), which can rise to 148.95 ML/d during peak times in dry years. Source: Southern Water's Water Resources Management Plan (WRMP).

were identified by the Interim SA as the quality, amount and distribution of water supplies and the physical water environments.

What has changed and how does this affect the SA?

- 6.14 The changes made to the Core Strategy are positive, though not considered significant in terms of changing the overall appraisal for water and soils.
- 6.15 The SA and HRA processes recommended that:
- The PPDCS contain a separate policy on the water environment that also incorporates the water-related aspects of Policy CS2 and CS3.
 - The policy includes wording to ensure that development proposals that pose unacceptable risk or harm to the quality and/or quantity of ground waters, surface waters, wetlands or coastal water systems will not be permitted.
 - It should also require that major proposals for new development should be able to demonstrate that there are, or will be, adequate water supply and waste-water treatment facilities in place to serve the whole development.
 - It is also recommended that more aspirational targets are set for the Code for Sustainable Homes and BREEAM.
 - The policy should require Sustainable Drainage Systems to be incorporated into all new development.
- 6.16 The Core Strategy has been updated to accommodate most of the above changes, although this has occurred by making additions to existing policies (rather than through a new policy). The Core Strategy also now makes reference to the Water Framework Directive.

Updated overall assessment and cumulative effects

- 6.17 On the whole, the cumulative effect of the CS on Water Resources and Quality is likely to be an adverse one, given the level of development proposed, however the Council has adopted strong policy mitigation to minimise this. The significance of this effect is likely to be exacerbated through the effects of climate change, which include a drier climate and higher temperatures. Increased abstraction has the potential to lead to reduced water levels, which can have adverse effects on the integrity of water dependent biodiversity. Changes to water levels can impact river flow and water quality, which can also adversely affect water dependent habitats and the species that rely upon them. Increased waste water discharges (consented) and surface water run-off (which can transfer pollutants to water bodies) have the potential to reduce water quality, which can also have adverse effects on habitats and species. Further stringent requirements should be included in Development Management policies to further minimise any adverse effects.
- 6.18 There is the potential for positive effects on soils as the CS maximises the efficient use of land through focussing re-investment/ development on underused, derelict and/ or previously developed land. This may also include the remediation of contaminated sites. Negative effects are also likely (e.g.

through increased mineral workings and soil loss and disturbance from development). This could be further addressed through development management policies within the Site Allocations and Development Management DPD.

Waste

Updated context & situation without the Core Strategy

- 6.19 The new municipal waste contract for Medway means that no new provision will be required for treatment/processing of household municipal solid waste within the area, as it will be dealt with elsewhere. There is capacity to deal with most other waste streams at established facilities, at least in the short term.
- 6.20 Growth in the area will mean that there will be an increase in the amount of waste generated. However, a large proportion of this will be going out of the area due to the recent waste contract that will apply throughout the whole of the plan period. In addition, fiscal and national policy measures are strongly encouraging the reuse and recycling of materials, notably in construction. This will help to offset increases generated by growth in the area.
- 6.21 There is already significant capacity to deal with certain types, notably industrial and commercial materials but a complete lack of landfill capacity would be likely to cause increasing quantities of materials to be diverted elsewhere, contrary to the proximity principle that is intended to apply to waste. If this occurred there would be increasing negative impacts both within and beyond Medway as a result of the need to transport materials.

Findings of the SA (Pre-Publication Draft)

- 6.22 The SA work to date notes the key issues in terms of waste are in waste reduction, increased provision for treatment/processing and striving for waste self-sufficiency.

What has changed and how does this affect the SA?

- 6.23 The key relevant policy in this instance is Policy CS23: Waste Management, which aims to reduce waste through provision of facilities in new development and addressing the required provision (in an environmentally- sensitive way). The policy was amended for the Publication Draft to consider the potential for a soil treatment facility, which has been identified as a need due to the volumes of contaminated soil resulting from large-scale regeneration in the area. This change will help to further address the issues around waste self-sufficiency. The policy also now includes further references to rural landscape and character (addressed under heading: Biodiversity, Open Space and Landscape).

Updated overall assessment and cumulative effects

- 6.24 Due to the level of new housing and employment development proposed overall, the Core Strategy is likely to lead cumulatively to an increased level of waste production in Medway, however the measures proposed in Policy CS23, alongside a wider societal drive towards zero waste will help to minimise this impact, especially in the long term.

Biodiversity, open space and landscape

Updated context & situation without the Core Strategy

- 6.25 Medway has a high proportion of internationally and nationally significant landscapes and nature conservation areas, including the Thames estuary and River Medway estuary marshes, the chalk grasslands of the Kent Downs and also its ancient woodlands.
- 6.26 Medway has played a major role in progressing key Green Infrastructure sites, such as the Great Lines Heritage Park and contributing to plans for 'Greening the Gateway' in north Kent. This includes a number of projects that have funded schemes to deliver specific elements of green infrastructure, such as the Cluster Study plans carried out by Greening the Gateway Kent and Medway, the Valley of Visions Landscape Partnership, and Kent Wildlife Trust's green infrastructure plans for the Hoo Peninsula and chalk grassland to the south of Medway, known as 'Living Landscapes'.
- 6.27 The findings of the first phase of a study commissioned by the North Kent Environment and Planning Group (NKEPG) on bird disturbance has suggested that there may be a correlation between recreational disturbance and a decline of designated bird populations in North Kent and that recreational visitors tend to be from within the local area. This has implications for European designated sites in and near to Medway and is further considered in the Habitats Regulations Assessment undertaken for the Core Strategy.

Findings of the SA (Pre-Publication Draft)

- 6.28 The Interim SA of the Pre-Publication Draft noted that the proposed level of growth will have negative effects on biodiversity, open space and landscape but that the protection provided by CS policies would be sufficient to ensure that these effects would not be significant.

What has changed and how does this affect the SA?

- 6.29 The SA of the Pre-Publication Draft did not identify increased recreational activity as potentially having a significant negative effect on biodiversity. This was primarily due to a lack of evidence, which has now been addressed through the North Kent Visitor and bird disturbance studies commissioned by NKEPG. The appraisal of individual policies has been updated to reflect this. Enfusion has recommended (and Officers have included) new policy wording (in Policy CS6: Preservation and Enhancement of Natural Assets)) that seeks to

support the findings and recommendations of the NKEPG work. This issue is considered in detail through the Habitats Regulations Assessment (HRA) of the Core Strategy - see separate report.

- 6.30 There have been no additional changes to the Publication Draft that significantly alter the findings of the Interim SA in relation to open space. With regard to landscape there have been a number of additions to the Publication Draft that will help to enhance the benefits of the Core Strategy. This includes the protection of the River Medway as a key landscape feature of natural beauty in its own right (Policy CS8) and encouraging opportunities for landscape enhancement in line with the objectives of the Kent Downs AONB designation (Policy CS32). The Publication Draft also ensures that waste management proposals take account of impacts on the rural landscape.

Updated overall assessment and cumulative effects

- 6.31 There is the potential for significant cumulative/ incremental negative effects for biodiversity across the region [particularly for sensitive estuarine environments]. The CS seeks to protect, maintain and enhance populations of wild species and other biodiversity features, which will help to minimise effects. The CS focuses development on underused, derelict and/ or previously developed land, which has the potential for significant positive effects on the townscape of settlements.
- 6.32 The HRA of the Core Strategy concluded that the Plan would not have adverse effects on the integrity of European sites either alone or in combination, provided that the recommendations made by the AA are incorporated into the Plan. The detailed findings of the assessment process, including recommendations for avoidance and mitigation measures are set out in the separate HRA (AA) Report for the Submission Draft Core Strategy.
- 6.33 Concerns have been raised through the consultation on the Plan and SA in relation to the impacts of the Lodge Hill development on biodiversity. The proposed development is set within an area of sensitive ecological sites with Chattenden Woods SSSI partially within the development boundary; Tower Hill to Cockham Woods SSSI located approximately 500m to the south and Medway Estuary and Marshes SSSI, SPA and Ramsar Site within 2km. There are a number of protected species present on the site, which includes a nationally important population of nightingales supported by habitat within the site boundary and Chattenden Woods SSSI, part of the reason for its designation.
- 6.34 Development at Lodge Hill is likely to have some adverse effects on landscape, however much of the site is previously developed land (a military training area) and the site is largely hidden within the landscape of the Hoo Peninsula.
- 6.35 There is also the potential for the Core Strategy to have positive effects on open space through the use of previously developed land and the provision of open space as part of major regeneration proposals. The CS not only seeks to protect existing open spaces but also seeks to improve accessibility through

the creation of footpaths, cycle routes, equestrian facilities and wildlife stepping stones to provide a multifunctional network of open space.

Climate adaptation and mitigation

Updated context & situation without the Core Strategy

- 6.36 Climate change is a serious issue facing society, with global average temperatures having risen by nearly 0.8 °C since the late 19th century, and rising at about 0.2 °C/decade over the past 25 years. Current projections for the UK suggest that in addition to the temperature increases and changes in rainfall, with wetter winters and longer, drier summers, there is likely to be more flooding⁹ as dry soils are unable to absorb the heavier downpours.
- 6.37 Changing climate patterns have the potential to increase incidences of flooding, increase coastal squeeze and will increase the importance of wildlife corridors and buffers to allow species to migrate and adapt.
- 6.38 The introduction of zero carbon buildings and increasing use of renewables has the potential to offset these effects, however changes are not occurring at the level required to avoid what experts have termed 'dangerous climate change'¹⁰.

Findings of the SA (Pre-Publication Draft)

- 6.39 The Interim SA of the Pre-Publication Draft noted the steps taken in the CS to mitigate climate change (through reduced emissions) and adapt to climate change (for example through better flood defences).

What has changed and how does this affect the SA?

- 6.40 Measures outlined in policies included requirements for meeting the Code for Sustainable Homes for residential buildings and BREEAM ratings for commercial buildings. These requirements reflected the national situation at the time, however that situation has now changed and Enfusion recommended further changes to the policy to reflect this (Policy CS4: Energy Efficiency and Renewable Energy)- these changes have been incorporated into the Submission Draft Core Strategy.

Updated overall assessment and cumulative effects

- 6.41 As a cross-cutting issue, climate change is related to many of the policies in the plan; from CS4: Energy Efficiency and Renewable Energy to CS24: Transport and Movement. The area policies, retail and economic development policies also relate to climate change, as the location and

⁹ See Chapter 10 Water and Soil for further information on flooding

¹⁰ Dangerous Climate is commonly referred to as a 2 °C (3.6 °F) ceiling on global warming thought necessary to avoid the most serious effects of global warming.

nature of development can have a significant impact on emissions through reducing the need to travel.

- 6.42 On the whole, the cumulative effect of the CS on Climate Change (emissions) is likely to be an adverse one; mostly due to the sheer volume of new development proposed. However, with the inclusion of Policies CS2, CS3 and CS4, and the strategic approach to development and transport, the SA has found that the CS includes some good measures to mitigate this effect. The suggestions (made through the SA workshop and subsequent advice) for amendments to Policy CS3 have been adopted in the current draft policy and are seen to be important in further mitigating greenhouse gas emissions in the Medway.
- 6.43 In terms of adaptation to climate change, the SA work found that various mitigation measures, included in policies on flood risk (Policy CS5) and natural assets (Policy CS6) will help the Medway to adapt to the impacts of climate change (including increased flooding, habitat fragmentation and increased temperature extremes).

7. Appraisal of the Publication Draft Core Strategy policies Against the Social Indicators

Community (population, crime, deprivation, health)

Updated context & situation without the Core Strategy

- 7.1 The key change to the baseline since the Final Scoping Report has been in terms of population growth, which has been slightly less than that predicted. In the middle of 2009 the population estimate was 254,800. Population growth in Medway has grown at a slower rate than England & Wales since 2001. It is expected that under existing population growth estimations, growth would continue, increasing to 275,200 by 2026 and then potentially reaching a rounded figure of 280,000 in 2028.
- 7.2 It would be expected without the Core Strategy that although the population of the area is younger than both regional and national rates, there would be a growth in the older population through the plan period. This has been identified both through work nationally by the Office of National Statistics (ONS), regional work and most recently area profiles published in 2010. Currently the older population is concentrated around Rainham; adjoining parts of Gillingham; Rochester town centre and parts of Cuxton and Halling.
- 7.3 The largest proportion of population change has occurred in those areas where there has been significant regeneration and this would be expected to continue over the plan period. The changes in the demographic make up of the area are crucial to ensuring that the right services are accommodated in the right places, as well as being a key role in ensuring sustainable communities both in the present and future.
- 7.4 The recent trend of a falling average age in Rochester and Gillingham town centres would be expected to continue, as well as the reduced number of dependents as a result of the increased number of the working age population across the central arc of the towns from Chatham to Gillingham.

Findings of the SA (Pre-Publication Draft)

- 7.5 SA work undertaken to date has shown that the overall effects of the CS on the community will be very positive, through enhanced prosperity, increased average earnings and much improved public spaces, community facilities and services. Other positive effects are likely through better transport services, safer neighbourhoods and centres and health benefits due to access to green spaces.

What has changed and how does this affect the SA?

- 7.6 Changes made to the Core Strategy that are relevant to this issue are as follows:

- Policy CS15 (Housing Design and other housing requirements): Strengthened policy on student accommodation to restrict Houses of Multiple Occupation and inclusion of space standards.
- Policy CS27 (Rochester) and CS28 (Chatham): Additional text to seek local employment opportunities.
- Policy CS28: Includes retention and development of services and facilities at Upper Halling and encourages communities to plan for village needs.

7.7 These amendments to the plan will ensure that the already significant community benefits from the CS will be further enhanced, with positive effects for community cohesion, social inclusion and poverty reduction.

Updated overall assessment and cumulative effects

- 7.8 As a whole, the CS will have long-term positive cumulative effects on communities. The plan recognises the needs of Medway's disabled and ageing population and seeks to accommodate those needs. Policy CS15 ensures housing developments are well designed and are capable of adaptation to accommodate lifestyle changes and to achieve the Lifetime Homes Standard. The redevelopment of disused areas - including the provision of local employment and community services and facilities will have significant positive effects on community cohesion, social inclusion and poverty reduction and should help to minimise crime.
- 7.9 The effects for health are overwhelmingly positive in the long term for the District's residents: indirectly through enhanced economy and employment opportunities, poverty reduction and increased social inclusion; but also directly through enhanced community and health facilities and increased recreational spaces and opportunities.
- 7.10 The area will be expected to be more prosperous with more people working locally and enjoying average earnings closer to the regional average of £33,500 in 2009. The town centres will have better quality open spaces and services and feel safer to transit through, particularly at night. There will be more cultural facilities and people will have greater access to a number of historic assets. The changes to the transport system and the town centres will allow greater access to services and facilities for the population as a whole.
- 7.11 There will be a greater number of multi-functional green spaces in a network across the area, especially connecting across the urban area. These will improve quality of life, as well as the cultural offering and provide greater access to the wider countryside.
- 7.12 However, potential negative effects on air quality, (as considered in section 6 under air quality) may have subsequent effects on resident's health, particularly those with respiratory conditions. As discussed in section 6, this is an area that will need ongoing monitoring.

Cultural Heritage and Material Assets

Updated context & situation without the Core Strategy

- 7.13 There are many heritage assets in the District, but often these lack visibility or are adversely affected by neighbouring development of low visual quality. The town centres are not as vibrant or welcoming as they could be and, excepting Rochester, have poorly developed night time economies.
- 7.14 Without the Core Strategy, it is not expected that there would be any substantial change to heritage and cultural assets in the District. With regard to material assets, some reinvestment could be expected in the town centres but not on the scale envisaged in the Core Strategy.

Findings of the SA (Pre-Publication Draft)

- 7.15 The SA of the Pre-Publication Draft found that the CS will give a high level of protection to heritage assets and will expand the existing cultural offer in Medway. It notes the high level of protection afforded to heritage and culture through Policies CS11: Culture and Leisure and CS12: Heritage assets. Other policies that contribute positively to heritage are CS18: Tourism and CS10: Sport and recreation.

What has changed and how does this affect the SA?

- 7.16 There have been no additional changes to the Publication Draft that enhance or detract from the benefits stated. However, one further observation is the overall cumulative effect of development on the maritime character of the Medway and the need to ensure this character is not lost to new development, but enhanced. Policy CS25: The River Medway partially recognises this, but it may be possible to include reference to the distinct maritime heritage and character of the Medway in the CS or in future DPDs.

Updated overall assessment and cumulative effects

- 7.17 Overall, the CS has the potential for positive effects through the preservation and enhancement of cultural heritage. This includes supporting World Heritage Site status for the Chatham Dockyard and its Defences and the development of the Great Lines Heritage Park. Further reference to the distinct maritime heritage and character of the Medway and opportunities for development to enhance this character should be explored through the Development Management DPD.

Transport and accessibility

Updated context & situation without the Core Strategy

- 7.18 A combination of changes undertaken to the road system in and around Chatham and construction of the new Chatham waterfront bus interchange will result in an improvement to the traffic flow and bus services through

Chatham. This combined with the Urban Traffic Management Control (UTMC) system will help to reduce the levels of congestion and journey times in the urban area in the short term at least.

- 7.19 Without the Core Strategy, many of the planned schemes and measures would be expected to take place through the mechanism of the third Local Transport Plan (although there is some uncertainty around future funding). This is unlikely to apply to schemes requiring third party land or improvements associated with new built developments. Planned improvements to rail/bus interchanges, the introduction of park & ride sites and the development of a quality bus network should help create a shift to bus use for urban journeys. Schemes dealing with congestion 'hotspots' should also result in freer flowing traffic, with associated air quality benefits.

Findings of the SA (Pre-Publication Draft)

- 7.20 Previous SA work has found that the CS will help to facilitate significant rail improvements, park and ride facilities, and rationalisation of parking and junction improvements, whilst also increasing water-based transport. Policy CS24: Transport and Movement was seen to be of particular benefit. However the appraisal also cautioned that increased economic activity in the area may offset those benefits, resulting in an overall increase in traffic.

What has changed and how does this affect the SA?

- 7.21 Few amendments have been made to the CS that will affect transport. Those changes that have been made include amendments to Policy CS27: Rochester to state that the Council will work with bus operators to extend access to services in the south of the area. Further changes have been made to Policy CS33: Lodge Hill, with less specificity given as to which transport improvements will be provided by developers. Overall the effect of these changes is not of major significance.

Updated overall assessment and cumulative effects

- 7.22 The overall effect of the CS on transport and accessibility is difficult to predict at a strategic level of SA. The transportation effects of the proposed increased development in Medway (congestion, noise and air quality effects) will be difficult to mitigate; the CS policy mitigations will go some way, however this must be seen in conjunction with the Local Transport Plan (LTP 3) and closely monitored in the future, with aversive action taken as required. The SA makes a number of further recommendations (see also Air Quality topic), in particular a policy in support of electric cars and electric car infrastructure would be a positive step. Whilst this has not been taken up in the CS, it may be something that can be explored further by the Council in future planning documents and for particular developments.

Housing

Updated context & situation without the Core Strategy

- 7.23 Demographic trends point to a gradually ageing population and a continuing decline in the average size of households, plus a move towards net in-migration (out-migration has offset positive natural change over recent years). Though the recession has reduced house prices slightly in the area, a decline or stagnation of salaries and rising living costs mean that house prices are still unaffordable for many.
- 7.24 Without the Core Strategy, regeneration would continue but at a slower rate. However this would be likely to fall short of meeting local needs from new and smaller households over time and would not reflect Medway's location within the Thames Gateway growth area.

Findings of the SA (Pre-Publication Draft)

- 7.25 The SA of the Pre-Publication Draft identified that the Core Strategy would have significant benefits for the delivery and accessibility of housing. Housing development in general would continue to be driven by developers and the market. The general standards of housing would be expected to improve both in terms of flexibility and overall sustainability.
- 7.26 Sites in and around the town centres and along the urban waterfront are likely to have a high proportion of smaller units, with family sized units being located in the more suburban locations. Provision would be expected for students and people needing various forms of supported accommodation.
- 7.27 Beyond the urban area the new settlement at Lodge Hill would be expected to have a broad range of house types and tenures but with an overall bias towards family sized accommodation. The use of previously developed land and sustainable forms of construction should limit its impact and its good relationship with other settlements on the Hoo Peninsula should improve the sustainability of these rural settlements.
- 7.28 As such it would be expected that it would be easier for all sections of the community to find a suitable, affordable and sustainable home. The Core Strategy also allows for provision for Gypsy and Traveller communities housing needs through provisions outlined in Policy CS 16.

What has changed and how does this affect the SA?

- 7.29 There have been no significant changes to the Publication Draft to alter the findings of the Interim SA.

Updated overall assessment and cumulative effects

- 7.30 The effect of the Core Strategy on housing will be one of the most significant and long-lasting of the plan's effects on sustainability through meeting Medway's housing demand and increasing the stock of affordable housing.

Through creating the policy framework for the development of a settlement at Lodge Hill, the Core Strategy will help to ensure that a mix of housing types and tenures are provided to meet housing demand in the Medway and wider Gateway.

8. Appraisal of the Publication Draft Core Strategy policies Against the Economic Indicators

Economy and employment

Updated context & situation without the Core Strategy

- 8.1 Medway is currently faring reasonably well in terms of the impact of the recession on the wider area. According to the latest data available, it has seen a significant fall in the overall unemployment rate, compared with the regional or national average. However overall Medway's unemployment rate is still slightly above the average at 4.2% rather than the GB average of 3.8%.
- 8.2 The number of Job Search Allowance claimants in Medway has increased by over 17% in the last year. This is the fifth highest increase compared to Kent's boroughs and districts with Gravesham experiencing a 21.9% increase. Youth unemployment has increased 18% compared to June, but again it is apparent that this is still low when compared against similar authorities in the South East and though below the regional average still marginally above the national average. The number of Medway's working population on 'out of work benefits' has remained static compared to small reductions at regional and national level.
- 8.3 In addition, the number of local residents in employment in Medway has risen markedly from 67.7% to 69.3% for the period April 2010 - March 2011. This compares to an unchanged national average. Therefore Medway's lag behind the national average has narrowed markedly.
- 8.4 The recession is clearly impacting on local businesses, with a decline in the number of PAYE and VAT registered businesses since 2008. This figure remains higher than the SE average and only fractionally below the national average. The proportion of the working age population with a degree qualification is increasing more rapidly than the regional and national average.

Findings of the SA (Pre-Publication Draft)

- 8.1 SA work undertake to date has shown that the overall effects of the CS on the economy will be very positive, with significant improvement in overall economic performance and much more activity in and around the town centres and particular benefits for Chatham town centre through new retail development. Benefits would be distributed throughout Medway, however, with employment provision at Lodge Hill, Grain, Kingsnorth and Rochester Airfield. Policy CS17: Economic Development was seen as instrumental in achieving these benefits and this policy remains little changed.

What has changed and how does this affect the SA?

- 8.2 The key change to the Publication Draft relates to encouraging development of a business incubator and grow-on space for new and expanding businesses

- this will further enhance the economic benefits of the CS. Another change is a small drop in the provision of employment floorspace by approximately 60,000 sqm to reflect the current economic situation, which could be argued to be a more realistic scenario. A range of other policies (in particular the Area Policies) will all help to increase the economic benefits facilitated by the CS - this has been improved by the addition of wording to Policy CS27: Rochester and CS28: Chatham that further encourages local employment opportunities.

Updated overall assessment and cumulative effects

- 8.3 On the whole, the CS will have major significant cumulative effects for the economy and employment in Medway. A cautionary note from the previous SA still applies: that the employment provision at Lodge Hill should be carefully considered in terms of its linkages to existing businesses and to ensure that it does not draw people from the other nearby settlements on the Peninsula, which would be harmful to their vitality. Ongoing monitoring of economic and employment indicators will be important (especially in consideration of the current global financial situation), such that future planning can respond and adapt to any change in circumstances.

9. Appraisal of Cross-boundary Issues and Cumulative Effects

Cross-boundary Effects

- 9.1 The Medway Core Strategy has the potential to cause cross-boundary effects on surrounding Boroughs. Mostly it is considered that there will be limited direct impact upon neighbouring areas due to the fact that no significant developments are proposed close to or straddling administrative boundaries.
- 9.2 However there is the potential for indirect effects, both positive (through the increased regeneration and employment opportunities created in Medway), and negative effects, especially from increased traffic leading to congestion or air quality issues. Gravesham was the Borough seen as most likely to be affected by the Medway Core Strategy, primarily due to the location of Lodge Hill nearer to its administrative boundary.
- 9.3 The main developments (Lodge Hill and Riverside regeneration sites) are likely to increase traffic on key A- roads, including the A289 (which incorporates part of the Gillingham AQMA and the High Street Rainham AQMA), the A2 (incorporating the Central Medway AQMA) and through the District and into neighbouring Districts, especially Gravesham.
- 9.4 A noticeable impact will also be an increased level of traffic across the Peninsula, including increased use of Higham station by commuters to London, bus services and a general increase in traffic and congestion from this area. However it is noted that mitigation measures are proposed for Lodge Hill to address this.
- 9.5 The other noticeable impact described in the SA was a draw of people from nearby settlements travelling to the shops and employment at Lodge Hill, however it is noted that a retail report prepared by Land Securities has shown that the quantum of retail floorspace proposed would not create an unacceptable impact.
- 9.6 The SA has included further suggestions for how any impacts may be minimised, including through a continuation of good cross-boundary working that is already underway, for example on green infrastructure and biodiversity.

Cumulative Effects

- 9.7 In addition to the appraisal of individual policies undertaken in SA/SEA, the SEA Directive requires consideration of the overall effects of the plan, including the secondary, synergistic and cumulative effects of plan policies. This may include incremental effects that can have a small effect individually, but can accrue to have significant environmental effects.
- 9.8 In good practice SA/SEA, the analysis of cumulative effects should also consider the significant effects of the plan in-combination with the effects of other plans, policies and proposals.

- 9.9 This section summarises the key effects, including the cumulative effects of the plan policies (known as the intra-plan effects) and the combined effects with other relevant plans and projects (known as the inter-plan effects).

Cumulative Effect of Plan Policies (Intra-Plan Effects)

- 9.10 To assist in considering the overall effects of policies within the plan when assessed against the different SA Framework objectives, a summary has been prepared, illustrating how each policy has performed against each SA Objective. This is provided in the following table:

Table 9.1: Intra-plan effects: Cumulative summary of Core Strategy policies

SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Policy	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	transport	Education and workforce	Economy	
CS1: Regenerating Medway	0	-	-	0	0	✓	✓	+	+	0	+	0	0	-	✓	✓	
CS2: Quality and Sustainable Design	0	0	+	0	+	✓	✓	0	+	0	0	+	0	+	✓	✓	
CS3: Mitigation and Adaptation to Climate Change	+	0	+	0	✓	+	0	0	0	0	✓	0	0	0	0	0	
CS4: Energy Efficiency and Renewable Energy	0	0	0	0	✓	0	0	0	+	0	+	0	✓	0	✓	✓	
CS5: Development and Flood Risk	✓	0	0	✓	✓	+	0	0	+	0	+	0	+	0	0	0	
CS6: Preservation and enhancement of Natural Assets	✓	0	0	+	✓	0	0	+	0	0	0	✓	0	0	0	0	
CS7: Countryside and Landscape	+	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0	
CS8: Open Space, Green Grid and Public Realm	0	0	0	0	0	0	0	✓	✓	✓	✓	+	0	+	0	0	
CS9: Health and Social Infrastructure	0	+	+	0	0	0	+	✓	✓	0	✓	✓	0	0	0	+	
CS10: Sport and Recreation	-	0	0	0	0	0	✓	✓	0	0	✓	✓	0	0	+	+	
CS11: Culture and Leisure	0	0	0	0	0	+	✓	0	+	0	0	✓	0	0	✓	✓	
CS12: Heritage Assets	0	0	0	0	0	+	✓	0	+	0	0	✓	0	0	✓	✓	
CS13: Housing Provision and Distribution	-	-	-	0	-	✓	✓	+	✓	+	✓	0	+	-	+	+	
CS14: Affordable Housing	0	0	0	0	-	✓	✓	+	✓	+	✓	0	0	0	+	+	
CS15: Housing and Other Housing Requirements	0	0	0	0	-	✓	✓	✓	✓	+	✓	0	✓	0	+	+	
CS16: Gypsies, Travellers and Travelling Showpeople	0	0	0	0	-	✓	✓	0	✓	0	✓	0	0	0	+	+	
CS17: Economic Strategy	-	-	-	0	-	✓	✓	✓	✓	0	✓	+	✓	-	✓	✓	

Policy	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	transport	Education and workforce	Economy
CS18: Tourism	0	0	0	0	0	+	✓	0	+	0	0	+	+	-	✓	✓
CS19: Retail and Town Centres	0	0	0	0	0	+	✓	0	✓	0	✓	0	0	-	✓	✓
CS20: Education and Personal Development	+	0	0	0	0	+	✓	+	✓	0	0	+	+	-	✓	✓
CS21: Conventional Energy	0	-	0	0	0	✓	✓	0	✓	0	✓	0	✓	-	✓	✓
CS22: Minerals Provision	-	0	-	0	0	+	0	0	✓	0	0	0	+	-	✓	✓
CS23: Waste Management	0	0	0	0	✓	+	✓	0	+	0	+	0	✓	-	✓	✓
CS25: The River Medway	✓	0	✓	0	✓	0	0	+	0	0	+	✓	0	+	+	+
CS26: Strood	-	-	-	0	-	✓	✓	0	+	+	0	+	0	0	✓	✓
CS 27: Rochester	-	-	-	0	0	+	✓	0	0	0	0	+	0	+	✓	✓
CS28: Chatham	-	-	-	0	+	+	✓	0	✓	✓	✓	0	0	0	✓	✓
CS29: Gillingham	-	-	-	0	+	0	✓	0	+	0	0	+	0	0	✓	✓
CS30: Rainham	-	-	-	0	+	0	✓	+	+	0	+	0	0	0	0	✓
CS31: Hoo Peninsula and the Isle of Grain	-	-	-	0	0	+	✓	+	+	+	✓	0	0	0	✓	✓
CS32: Medway Valley	-	-	-	0	0	+	✓	+	+	0	✓	+	0	0	+	✓
CS33: Lodge Hill	-	-	-	+	+	✓	✓	0	✓	0	+	✓	✓	+	✓	✓
CS34: Implementation of the Core Strategy	0	0	0	0	0	✓	0	0	0	0	✓	0	0	0	0	✓
CS35: Developer Contributions	0	0	0	0	0	0	0	0	0	0	✓	0	0	0	0	0

Significant Positive Cumulative Effects of Plan Policies (Intra-Plan Effects)

- 9.11 The SA found that the majority of policies were found to have significant positive sustainability benefits for Medway. The following table summarises the significant positive effects identified:

Table 9.2: Significant positive effects of the emerging Core Strategy

Key relevant indicator:	Positive effects identified:
Housing	The plan will have significant positive effects through meeting the housing needs of Medway, particularly affordable housing needs, and in locations where housing is most needed.
Economy and employment	The plan will have positive effects for the economic regeneration of existing centres. Development at Lodge Hill will provide additional employment space for higher value jobs to be accommodated.
Water and Soil	The plan maximises the efficient use of land through focussing re-investment/ development on underused, derelict and/ or previously developed land.
Community (equalities)	The plan recognises the needs of Medway's disabled and ageing population and seeks to accommodate those needs, ensuring that housing developments are well designed and are capable of adaptation to accommodate lifestyle changes and to achieve the Lifetime Homes Standard.
Community (crime, income and deprivation)	The plan will have significant positive effects on community cohesion, social inclusion and poverty reduction through the redevelopment of disused areas, which includes the provision of local employment as well as community services and facilities.
Biodiversity, open space and landscape	Redevelopment of underused, derelict and/ or previously developed land will have positive effects on townscape. There is a strong emphasis on the preservation and enhancement of natural assets and the provision of green infrastructure.

Significant negative cumulative effects of plan policies (Intra-plan effects)

- 9.12 Alongside the many positive effects of the plan, significant negative sustainability effects were also identified. These primarily relate to the increased residential and employment development proposed in the plan. Negative effects identified are summarised below:

Table 9.3: Significant negative effects of the emerging Core Strategy

Key relevant SA Objective:	Negative Effects identified:
Air Quality; Biodiversity, open space and landscape; Water and soil and Waste	The cumulative effects of increased development, including housing and employment development include: ■ increased air pollution (local and regional); ■ direct land-take; ■ pressures on biodiversity from increased recreational disturbance & urbanisation; ■ pressures on water resources and water quality; ■ increased noise and light pollution, particularly from traffic; ■ increased waste production; ■ loss of tranquillity ; ■ implications for human health (e.g. from increased pollution); and ■ incremental effects on landscape and townscapes.
Climate Change mitigation and adaptation	An increase in Medway's contribution to greenhouse gas production- this is inevitable given the amount of new development proposed, and includes factors such as increased transportation costs, embodied energy in construction materials and increased energy use from new housing and employment development.

Interactions with other relevant plans and projects (Inter-plan effects)

- 9.13 In considering the in-combination effects of other plans and projects, priority has been given to key documents that affect planning and development in Medway and neighbouring authorities. Documents considered included neighbouring authorities LDFs, transport and waste and minerals plans. Projects considered included significant proposals such as the Thames Estuary 2100 Proposal. It is noted that this is not an exhaustive list of policies or projects; however its focus on the most influential documents has allowed a strategic level appraisal of Inter-Plan effects.
- 9.14 The results of this analysis illustrate a range of positive and negative effects for Medway and the wider environment. Positive effects relate primarily to social and economic benefits: an increase in affordable housing, enhanced infrastructure, including community facilities, enhanced employment and economic opportunities, and improved access to services, employment and facilities.
- 9.15 Negative effects identified from the inter-plan analysis relate to the cumulative and incremental effects of development: noise, air, light and water pollution, incremental effects on biodiversity, increased waste production and an increase in greenhouse gas emissions.

- 9.16 In preparing plan polices, Medway Council has already sought to mitigate many of these negative effects and is commended for the work undertaken to date. It is also recognised that some mitigation measures are more appropriately dealt with at lower tiers of plan-making, for example in Development Management Policies. Such matters should be addressed within other Development Plan Documents, through the development management process, or future iterations of the Core Strategy, as appropriate.

Table 9.4: Significant Inter-Plan Cumulative Effects

Plans, programmes or projects	Significant combined effects of Medway's Core Strategy with other plans, projects or policies
Neighbouring LDFs (Dartford, Gravesham, Swale, Maidstone and Tonbridge and Malling).	Positive The housing allocations for Medway when combined with those in neighbouring authorities will have a positive cumulative effect in meeting housing demand, particularly for affordable housing. There is also the potential for positive cumulative effects for the economy and employment through regeneration of existing centres and provision of new employment space. This along with the provision of community services and facilities will have the potential for indirect positive cumulative effects on communities through increased employment opportunities and social inclusion.
	Negative When combined with that in neighbouring authorities the development proposed in Medway will have a negative cumulative effect on air quality and water through increased atmospheric emissions, water abstraction and water pollution (surface water runoff and consented discharges). These effects along with increased levels of disturbance (recreational activity, noise and light pollution) have the potential for cumulative negative effects on biodiversity. Given the level of development proposed, it is inevitable that there will also be cumulative negative effects on climate change through an increase in greenhouse gas emissions from increased transportation costs, embodied energy in construction materials and additional energy use from new housing and employment. The level of proposed development will also lead to increased production of household and commercial waste from demolition and construction.
Local Transport Plans (Kent County Council and Medway Council)	Positive Positive cumulative effects through enhancing accessibility in the area as a result of improvements to local roads and support for sustainable transport, walking and cycling.
Minerals and Waste Development Frameworks (Kent County Council)	Positive Potential for cumulative positive effects through increased use of sustainable waste management practices in the region, moving waste up the waste hierarchy.
Thames Estuary	Positive

2100 Plan (TE2100)	The Thames Estuary 2100 Plan proposes the creation of intertidal and freshwater habitats in Medway to compensate for the valuable habitats being lost elsewhere due to flood defences. This has the potential for positive effects on biodiversity within Medway and could help to mitigate the negative effects identified with regard to the Core Strategy. There is also the potential for positive effects on climate change, human health and the economy as the CS (Policy CS5) and TE2100 seek to reduce the risk of flooding in the area.
The Medway Estuary and Swale Shoreline Management Plan (SMP) and Isle of Grain to South Foreland SMP	Positive Potential for positive effects on climate change, human health and the economy through managing flood risk in the area.
	Negative Potential for negative effects on biodiversity as a result of Managed Realignment and Hold the Line Policies, which will result in freshwater habitat displacement and intertidal habitat growth.
Medway Draft Cultural Strategy	Positive Together the CS combined with the Culture Strategy seek to protect and improve accessibility to cultural heritage as well as contribute to economic prosperity. Potential for positive effects on cultural heritage, accessibility and the economy.

10. SA Monitoring

10.1 The aim of SA monitoring is to set a framework to show whether progress is being made towards sustainable development throughout the Core Strategy's plan period. This section discusses indicators and targets to help monitor the sustainability effects of the LDF. Targets and/or indicators for each sustainability objective have been identified (from the SA Framework) to provide a suggested list for discussion, and considered further to ensure they measure the significant sustainability effects of the plan, as required by the SEA Directive.

10.2 Monitoring arrangements should be designed to:

- highlight significant effects;
- highlight effects which differ from those that were predicted; and
- provide a useful source of baseline information for the future.

SA monitoring proposals for the Medway Core Strategy

10.3 Government requires local planning authorities to produce Annual Monitoring Reports (AMRs). According to government these should include the findings of SA monitoring. Accordingly, the monitoring strategy for the SA should be integrated with the LDF AMR. When preparing the LDF AMR, Medway Council will consider this SA chapter to ensure recommended monitoring proposals are included, where practicable.

10.4 The proposed LDF monitoring strategy should:

- Clearly set out who is responsible for the monitoring, as well as it's timing, frequency and format for presenting results;
- By collecting new information, update and strengthen original baseline data, rectifying any deficiencies, and thereby provide an improved basis for the formulation of future plans
- Establish a mechanism for action to enhance positive effects of the plan, mitigate any negative ones and assess any areas that were originally identified as containing uncertainty. The aim should be to keep the LDF working at maximum effectiveness for the benefit of the community; and
- Empower all of the community by providing a clear and easily understandable picture of how actual implementation of the LDF is affecting the District. Is it moving the area towards or away from the more sustainable future we intended? Are any significant effects identified actually happening? Are any unforeseen consequences being felt? Are any mitigation measures that were proposed operating effectively?

10.5 Indicators aim to measure all relevant aspects of life: social and economic as well as environmental. These are drawn from:

- Objectives and targets set out in the LDF - these will mostly be quantitative and may be expressed as maps, graphs, diagrams or percentages (e.g. Percentage of new housing built on brownfield land, target of 10% of energy on major new developments to be provided by renewables etc.);
- Indicators already identified and used in the SA process, again mostly likely to be quantitative;
- Measures drawn from the baseline data collected during the early stages of the LDF or from the previous Local Plan (e.g. air quality, extent of wildlife habitats, need for affordable housing); and,
- Any other measures suggested by the community. These might be more qualitative (e.g. quality of life) and could be useful in enriching understanding and giving people a sense of ownership of the LDF.

10.6 The table below contains a list of proposed SA indicators and targets to be incorporated into the AMR as considered appropriate by Council.

Figure 10.1: Monitoring Framework

	SA Objective	Framework Indicators
1	Conserve and enhance the diversity and abundance of habitats and species	• Extent and condition of key habitats • Condition of SSSI's • Reported levels of damage to designated sites • Achievement of Biodiversity Action Plan targets • Number/area of Local Nature Reserves • Population of wild birds and farmland birds • Area of land covered by agri-environment schemes
2	Reduce air pollution and improve air quality, including reduction of greenhouse gas emissions	• Achievement of Emission Limit Values • Population living in Air Quality Management Areas • Number of days of air pollution exceedances • Emission of greenhouse gases from energy consumption, transport, and land and sea waste management
3	Maintain an improve quality of ground water and surface waters and security of supply	• Quality (biology and chemistry) of rivers, canals and freshwater bodies • Rivers of good or fair chemical and biological water quality • Compliance with EC Bathing Waters Directive • Water use (by sector, including leakage) and availability • Per capita consumption of water • Incidents of major and significant water pollution
4	Reduce risk of flooding and ensure resilience of buildings and minimise the effect on public services and infrastructure	• Properties at risk from flooding • Number of additional houses where flood risk has been reduced • New development with sustainable drainage installed
5	Reduce ecological footprint through prudent use of natural resources, reduction in waste management and sustainable waste management practices	• Waste disposal in landfill. • Percentage of the total tonnage of all types of waste that has been recycled; composted; used to recover heat, power and other energy solutions; and land filled • Number of new buildings reaching Code for Sustainable Homes Level 4 or above by 2013.
6	Provide opportunity for everyone to live in a decent, sustainably constructed, affordable	• Percentage of new and retrofit homes reaching Sustainable Homes Level 4 or above

	home suitable to their needs	• Housing completions compared with regional guidance. • Affordable homes within the total housing stock. • Homelessness. • Number of unfit homes per 1,000 dwellings.
7	Maximise land use efficiency through appropriate use of previously developed land and existing buildings	• Housing density • Percentage of development on previously developed land
8	Improve the health and well-being of the population and reduce health inequalities	• Death rates from circulatory disease, cancer, and accidents, and suicide. • Infant mortality rates. • Conceptions among girls under 18. • Life expectancy. • Obesity
9	Reduce inequalities in poverty and social exclusion	• Proportion of children under 16 who live in low- income households. • Percentage of population of working age who are claiming key benefits. • Number of households in fuel poverty • Proportion of population who live in wards that rank within the most deprived 10% and/or 25% of wards in the country. • Access to services for disabled people
10	Reduce crime and the perception of crime	• Recorded crimes per 1,000 population • Fear of crime surveys • Number of transport accidents • Level of domestic burglaries, violent offences and vehicle crimes per 1,000 population
11	Improve accessibility to key services and facilities (inc. countryside, leisure/recreation and historic environment)	• Percentage of development within 10 minutes or 500m walk of a frequent bus route/rail service. • Access to services for disabled people • Distance to nearest leisure or cultural facility • Percentage of land designated for particular quality or amenity value, including publicly accessible land and greenways. • Proportion of population within 200m of parks and open space • The proportion of Medway residents meeting the Accessible Greenspace Standards: - live no further than 300m away from nearest area of natural green space

		of 2ha in size - at least one accessible 20ha site within 2km of home - one accessible 100ha site within 5km of home - one accessible 500ha site within 10km of home • Participation in sports, outdoor and volunteer activities • Percentage of Listed Buildings and archaeological sites 'at risk.' • Buildings of Grade I and Grade II* at risk of decay. • Additional listed building or conservation area designations per annum • Participation in Cultural activities
12	Conserve and enhance historic buildings, archaeological sites and culturally important features and increase engagement by all sections of community	• Electricity generated from renewable energy sources and CHP located in the area. • Energy consumption per building and per occupant. • CO₂ emissions. • Number of households in fuel poverty
13	Increase energy efficiency; the proportion of energy generated from renewable sources and the diversity and security of energy supplies	• Distances travelled per person per year by mode of transport. • Traffic volumes. • Growth in road traffic. • Average vehicle speeds. • Proportion of travel by car. • Investment in public transport, walking and cycling
14	Reduce traffic and congestion by reducing need to travel and improving travel choice	• Proportion of 19 year olds with Level 2 qualifications (% GCSEs A*-C or NVQ equivalent) • Percentage of population of working age qualified to NVQ Level 3 or equivalent. • Proportion of adults with above or below average literacy and numeracy skills.
15	Raise educational achievements through developing opportunities to acquire skills, to develop and maintain workforce	• Business start-ups net of closures. • Inward investment. • Social and community enterprises. • GVA per capita
16	Support and improve employment and economic competitiveness in town centres and deprived areas	

11. Conclusion and Summary

- 11.1 This SA report (including the accompanying appendices) has summarised the process and findings of the Sustainability Appraisal process to date, from the SA Scoping through to the identification of issues and options and various stages of policy refinement. This report updates the previous findings to account for changes made between the Pre-Publication Core Strategy and the current Submission Strategy. It has also included additional information in relation to cumulative effects arising from the plan.
- 11.2 The SA has found that the Medway Core Strategy will make a significant contribution to sustainability in Medway, with a particularly strong focus on meeting housing, community and economic needs and on enhancing and preserving Medway's unique environment.
- 11.3 The key negative effects arising from the Core Strategy are due to the environmental effects resulting from the increased housing and employment development in Medway, including when considered alongside neighbouring plans and in the wider Gateway. Throughout the process the SA has made recommendations that have been incorporated within the plan to mitigate these negative effects and enhance the positive effects.
- 11.4 This SA Report will form part of the evidence base during the Examination of the Core Strategy, accompanying the adopted DPD when it is published.

APPENDICES:

- 1 Compliance with SEA Directive and Regulations
- 2 Responses to Consultations
- 3 SA Scoping Report (April 2009)
- 4 SA of Alternatives (Medway Initial SA July 2009)



Appendix 1



Appendix 1: Compliance and good practice review ¹ for SA/SEA of Medway LDF Pre-Publication Draft Core Strategy

		Requirements of SEA Directive	Compliance	Reference to Final SA Report, including appendices 3 (SA Scoping and 4 (SA of Alternatives) Commentary
	Objectives and Context			
1	The plan's or programme's purpose and objectives are made clear.	Directive 2001/42/EC Article 5(1)a	Yes	The purpose of the Core Strategy is set out at the beginning of Section 2 of the Scoping Report together with the vision and objectives for the plan.
2	Sustainability/environmental issues and constraints, including international and EC protection objectives, are considered in developing objectives and targets.	Directive 2001/42/EC Article 5(1)e	Yes	The sustainability/environmental protection objectives considered are listed in Appendix 3: The Scoping Report (in Table 2 and detailed in Appendix 1 of that report setting out key aims/objectives and implications for the SA; and relevant plans & programmes, including international and European. A topic-based approach to identifying sustainability issues is reported in s4 of the Scoping report e.g. for biodiversity 4.10.1; and considered in developing objectives and targets as reported in s5 and Table 10: SA Framework
3	SA/SEA objectives, where used, are		Yes	Each sustainability/environmental objective is clearly set out in

¹ Adapted from ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive Appendix 9 Quality Assurance <http://www.communities.gov.uk/publications/planningandbuilding/practicalguideseg>

	clearly set out and linked to indicators and targets where appropriate.			Scoping Report Table 10: SA Framework and linked clearly to suggested indicators; and targets where appropriate to this level of plan (Core Strategy) e.g. BAP targets, accessible greenspace standards. This is also included in the main body of the SA report at tables 3.1 and 10.1.
4	Links with other related plans, programmes and policies are identified and explained.	Directive 2001/42/EC Article 5(1)a	Yes	Section 2 of Appendix 3: The Scoping Report (explains the links with other plans, programmes and strategies. Appendix 1 of SA Scoping Report lists the implications for the SA (and thus the LDF) of related PPs demonstrating that links with other plans and programmes have been identified and explained. Links with other plans are also made in the cumulative effects analysis undertaken in section 9 of the SA Report.
5	Conflicts that exist between SA/SEA objectives, between SA/SEA and plan objectives, and between SA/SEA and other plan objectives are identified and described.		Yes	Introduced in 2.3 Scoping Report. Conflicts between the plan objectives and SA objectives are considered in section 3 of the SA report in the compatibility analysis undertaken.
	Scoping			
6	Consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.	Directive 2001/42/EC Article 6.1 & 6.2	Yes	SA Scoping Report sent to the three statutory bodies – Environment Agency, English Heritage & Natural England –for SEA statutory period of 5 weeks until 23 Jan 2009. Also sent to key stakeholders of other LAs, SEERA and GOSE. Available on website for public consultation. Presentation to LSP in Dec 2008.
7	The assessment focuses on significant issues.		Yes	2.5 Scoping Report explains the assessment framework is focused on “the main local issues”; s3 & s4 explain how sustainability issues developed from PP review and baseline analyses are organised into topic areas that are significant.
8	Technical, procedural and other		Yes	Assumptions made (e.g. that potential options would receive all

	difficulties encountered are discussed; assumptions and uncertainties are made explicit.			relevant permissions from regulators) are well set out and explicitly recorded in the Initial SA Report – section on assumptions for each category of options. Further section on assumptions and un in section 3.16 of the SA report an 0.13 of the NTS.
9	Reasons are given for eliminating issues from further consideration.		N/A	No issues have been eliminated which is typical for SAs of spatial plans as all issues are generally considered to be relevant.
	Alternatives			
10	Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	Directive 2001/42/EC Article 5(1)h	Yes	The approach take to alternatives, including reasons for choosing realistic alternatives is documented in section 4: Appraisal of alternatives and detailed appraisal is included in Appendix 4: SA of alternatives.
11	Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.		Yes	Clearly documented in the SA Report with sections on "situation without the Core Strategy" and "situation with the Core Strategy" for each topic area.
12	The sustainability/ environmental effects (both adverse and beneficial) of each alternative are identified and compared.	Directive 2001/42/EC Article 5(1)b	Yes	Appendix 3: SA of alternatives describes effects (temporal, spatial and character) of each category of alternatives and in comparison, where relevant. Summary including comparative considerations clearly laid out in coloured boxes in report. Details for each alternative appraised against the SA objectives are presented in this appendix. Further discussion on how alternatives have been considered is presented in s4 of the SA Report. Limitations on realistic alternatives explained section 4.10-4.11.
13	Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.		Yes	Para 4.10-4.11 discuss issues relating to the need for alternatives to be consistent with the wider policy context, including the Regional Spatial Strategy.
14	Reasons are given for selection or elimination of alternatives.	Directive 2001/42/EC	Yes	The reasoning for selection and elimination of strategic alternatives is explained in the text of s4 of the SA Report.

		Article 5(1)h		
	Baseline information			
15	Relevant aspects of the current state of the environment/sustainability and their likely evolution without the plan are described.	Directive 2001/42/EC Article 5(1)b	Yes	Condition and character of relevant topics described in s4 of SA Scoping Report (attached at Appendix 3 of the SA report), including indirect and inter-relationships e.g. box SA Objective 1 biodiversity and recreation; 4.12.8 water and soils. Comparators cited e.g. 4.7.3 employment in Medway and SE/UK. Trends and evolution without the plan explained for each topic in the SA Report, Sections 6,7 and 8 under the heading: Updated context & situation without the Core Strategy.
16	Environmental/sustainability characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.	Directive 2001/42/EC Article 5(1)c & Article 5(1)d	Yes	Characteristics of areas described in s3&4 of SA Scoping Report at Appendix 3, including e.g. wider environmental boundaries for water (4.12) and e.g. wider sustainability boundaries for employment (4.7) and transport (4.14.4). Significant issues with regard to wider administrative boundaries explicitly described in s9 of SA Report (para 9.1)
17	Difficulties such as deficiencies in information or methods are explained.		Yes	Difficulties of strategic assessment generally set out in 2.5 of Initial SA Report. Section 0.13 and 3.16 describe difficulties in relation to uncertainties and data. Other difficulties (e.g. in predicting air quality impacts are described in sections 6-8 of the SA Report.
	Prediction and evaluation of likely significant environmental effects			
18	Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental/sustainability effects are also covered, as appropriate.	Directive 2001/42/EC Article 5(1)f	Yes	Relevant sustainability topics addressed and clearly presented including correlation with SEA topics e.g. Table 10 SA Scoping Report; and these relevant SA topics carried through into the SA reports.

19	Both positive and negative effects are considered, the duration of effects (short, medium or long-term), and temporary/permanent effects are addressed.	Directive 2001/42/EC Article 5(1)f	Yes	Appropriate categories of effects are considered as set out in SA method Table 2 in 3.10 of SA Scoping Report, and subsequently in SA Report in para 3.14. Duration of effects is also considered e.g. short, medium and longer term (defined in 3.15) & in discussion on appraisals.
20	Likely secondary, cumulative and synergistic effects are identified where practicable.	Directive 2001/42/EC Article 5(1)f	Yes	"Secondary" and "indirect" may be used interchangeably when describing effects. Where relevant, indirect effects are considered e.g. air quality & biodiversity with regard to waste alternatives and indirect effects of water on biodiversity (section 6). Cumulative effects (incorporating synergistic effects) are assessed and described in section 6-8 of the SA report under each topic and further described and summarised in section 9 of the SA report.
21	Inter-relationships between effects are considered where practicable.	Directive 2001/42/EC Article 5(1)f	Yes	Interactions or inter-relationships between effects are reported throughout, e.g. between biodiversity and water (section 6).
22	The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds.		Yes	The SA framework of objectives is specifically linked to quantitative indicators including relevant, accepted limits e.g. emission limit values for air quality, and thresholds e.g. accessible greenspace standards.
23	Methods used to evaluate the effects are described.		Yes	Methods are set out in 3 of the Scoping Report (appendix 3 of SA report) and section 3 of the SA report.
Mitigation measures				
24	Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	Directive 2001/42/EC Article 5(1)g	Yes	Throughout the process, the SA has recommended measures to prevent, reduce and offset significant adverse effects. In particular these included recommendations for changes to policy (especially to mitigate the effects on water, climate change and biodiversity). This is explained in sections 6-8 of the SA Report.
25	Issues to be taken into account in		Yes	In the SA Report, recommendations were made from the SA findings

	project consents are identified.			to improve the sustainability of policies including taking into account project consents (as appropriate to this level of plan-making). CS policies address strategic issues and further details will be considered in subsequent DPD on Development Management policies.
	The Environmental Report (SA Report)			
25	Is clear and concise in its layout and presentation.		Yes	The SA Report is clear and concise in layout and presentation.
26	Uses simple, clear language and avoids or explains technical terms.		Yes	The SA Report uses clear language and technical terms are explained.
27	Uses maps and other illustrations where appropriate.		Yes	Appropriate maps are presented in the Scoping Report (appendix 3) and the SA report (including tables and figures).
28	Explains the methodology used.		Yes	Methods clearly set out for scoping in s3 (appendix 3) and Section 3 of SA Report.
29	Explains who was consulted and what methods of consultation were used.		Yes	Scoping consultation clearly set out in s6 of Scoping Report and section 3 of the SA Report.
30	Identifies sources of information, including expert judgement and matters of opinion.	Directive 2001/42/EC Article 5.2	Yes	S5 of SA Scoping Report sets out the baseline information against which the appraisals have been made. Para 3.13 of SA Report explains how expert judgement was used.
31	Contains a non-technical summary (NTS) covering the overall approach to the SA/SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.	Directive 2001/42/EC Article 5 (1) j	Yes	Provided at beginning of SA report.
	Consultation			
32	The SA/SEA is consulted on as an integral part of the plan-making process.		Yes	The SA has been consulted on as an iterative and ongoing process – and integral to the plan-making process. Progression with the Draft Plan (the Core Strategy) has been consulted on at the same time as the SA findings.

33	Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.	Directive 2001/42/EC Article 6.1 & 6.2	Yes	Statutory and public consultation has been undertaken according to statutory timeframes i.e. 5 weeks for SA scoping; 6 weeks for the I&O and pre-publication draft CS. Details provided in the SA Report (section 3).
Decision-making and information on the decision				
34	The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.	Directive 2001/42/EC Article 8	Yes	Summarised in Section 3 of the report (and where, relevant in Appendix 3: Scoping). Consultation reps on the SA are set out in a table explaining and with Council's response. This is provided at Appendix 2.
35	An explanation is given of how they have been taken into account.	Directive 2001/42/EC Article 9 (1) b	Yes	As above, refer Appendix 2.
36	Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	Directive 2001/42/EC Article 9 (1) b	Yes	Refer section 4 of SA Report.
Monitoring measures				
37	Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	Directive 2001/42/EC Article 5 (1) i	Yes	Monitoring proposals are clearly set out in the Scoping Report and in s10 of the SA Report. They are practicable (correlated with AMR where possible) and linked clearly to the SA objectives – as set out in the SA Framework.
38	Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	Directive 2001/42/EC Article 10	Yes	Possibilities are indicated e.g. monitoring impacts of water demand and supply.
39	Monitoring enables unforeseen adverse		Yes	The annual AMR monitoring (incorporating SA) will allow for

	effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)			identification of any unforeseen adverse effects.
40	Proposals are made for action in response to significant adverse effects.		Yes	Throughout the SA report proposals are made for action in response to significant adverse effects (e.g. in sections 6-8).

Appendix 2



Appendix 2: Responses to Consultation

Scoping Report	Consultee Comments	Response
CB Richard Ellis on behalf of Land Securities Group Plc (23/01/09)		
General	Land Securities considers that the methodology set out in the draft Sustainability Appraisal Scoping Report should recognise the factors outlined in these representations so as to ensure that the Sustainability Appraisal reflects an approach which is consistent with National, Regional and Local policy, is sufficiently flexible and is cognisant of commercial and market imperatives and emerging methods of delivering energy to sites of the scale, mix and longevity of Lodge Hill/Chattenden.	The framework was based on the regional framework and had a large scope due to the lack of local data for monitoring purposes but were specifically tailored to try and address characteristics of the area
General	It is considered imperative that individual sustainability appraisals are wholly consistent with Government policies and do not seek to establish measures and parameters that are unique to a locality.	The framework was based on the regional framework and had a large scope due to the lack of local data for monitoring purposes but were specifically tailored to address issues specific to the area, recognising the need to take account of local characteristics
To accommodate physical differences between developments	Whilst there needs to be consistency of legislation and policy, they do need to recognize that every development has its own individual parameters where a rigid set of compliance requirements may not be suitable. It is considered necessary for a pragmatic approach to be established that enables 'best fit' solutions to be bespoke for each individual development, balancing possibly competing objectives.	The scoping report is outlining data on the area and producing a framework that is strategic and could be applied to all developments across the area.
To accommodate inconsistencies in legislation	It can be envisaged that inconsistencies between the legislation and statutory requirements that govern sustainability may not be resolved, particularly in their practical and commercial implications. Some flexibility will be required to the formal approval process to resolve such inconsistencies	Noted.

Scoping Report	Consultee Comments	Response
To accommodate phasing and timing	Lodge Hill/Chattenden and other large scale developments will be realized over a considerable period of time and it can be envisaged that the interim stages will require interim evaluation with the recognition that some required parameters will only be able to be achieved at full build out.	The framework set out within the scoping report is strategic and within the Interim Sustainability Appraisal the monitoring system is outlined
Market compatibility	Sustainability parameters are likely to lead to very different products to those which have historically been presented to the market. Whilst the parameters may be seen at a theoretical level to be beneficial to social, environmental and economic sustainability, if the products are not compatible with market demand, in practice the developments will not proceed	Noted but due to the national timescales laid out for zero carbon homes this is not considered to be an issue in terms of overall deliverability
Commercial Viability	Lodge Hill/Chattenden and other large scale developments will be delivered by the private sector where shareholder returns are a corporate mandate. If sustainability parameters cannot be delivered within a framework of commercial viability, developments again will not proceed. This applies equally to building product and utility provisions, water, power, heat, waste services, telecommunications etc	Noted but on balance not considered to be significant enough issue in terms of deliverability as there are more and more sustainably designed developments on the market
Code for Sustainable Homes	Lodge Hill/Chattenden will see the introduction of the Code for Sustainable Homes (CfSH) as one of the key drivers for sustainability to residential developments. Whilst fully supporting the underlying drive for 'carbon responsibility' and actively addressing climate change it is acknowledged that there is a general industry concern on the practical and cost effective measures to achieve Code for Sustainable Homes Levels 5 and 6 targets on a mass scale. Our own analysis has concluded that the achievement of CfSH Level 6 (zero net emission of carbon dioxide from all energy uses in the home) with either existing statutory provision for energy or in any combination of micro solutions is not currently practical or economic. The conclusion Land Securities has reached is that a macro solution involving distributed energy (DE) and distributed heat (DH) holds the greatest potential for delivering the energy demands of the new settlement and achieving a low/zero carbon development by viable and practical means.	Though the discussions within the industry are known the Scoping Report has made no suggestions as to what may be a preferred approach at 'Lodge Hill', it has simply outlined the main sustainability issues to the area and created a framework for all developments to be assessed in terms of their contribution to the sustainability of the area
Distributed Energy/District Heating	The possibility of DE/DH in conjunction with CfSH illustrates the challenges highlighted above, principally: Can the site accommodate a DE centre;	These issues are not for the scoping report to address.

Scoping Report	Consultee Comments	Response
	Is the fuel supply available and deliverable to the site by acceptable means; Is the investment in DE/DH commercially viable; DE/DJ cannot be funded out of land value and requires secured sales of power and heat. How can this be delivered; How are 'private wire' legislative conflicts to be resolved; DE/DH requires heat use to comply with 'good quality' CHP. CfSH requires limitations on heat requirements which will detract from DE/DH viability and legislative compliance; Are the air permeability/circulation requirements and implied fenestration levels in CfSH acceptable to the market? Can these be relaxed where DE/DH can supply heat loads to support openable windows and higher fenestration levels	
Environment Agency (23/01/2009)		
Links to other Plans, Programmes and Strategies	In the Regional Legislation/Local Documents reference should be made to the Regional Biodiversity Strategy produced by the South East England Biodiversity Forum. This strategy aims to identify Biodiversity Opportunity Areas across the south east and streamline the regional Biodiversity Action Plan (BAP) targets for habitats. This strategy should also be considered for Sustainability Issue – Objective 1 (page 22).	Noted
Relevant plans and programmes	Other documents that will be of use to the Council in their production of the LDF include the following: • Thames Draft River Basin Management Plan. • TE2100 reports Stage One, 2006: Early Conceptual Options (ECO) Consultation. We consulted on our objectives and how the measures to reduce flood risk could affect people or their environment. Stage Two, 2007-08: This High Level Options (HLO) Consultation. We asked for peoples views on: • the future direction for flood risk management in the Thames Estuary • what needs to be done to achieve this direction in their local area. Stage Three, We will publish a draft TE2100 plan in spring 2009 with the final plan	Noted

Scoping Report	Consultee Comments	Response
	submitted to Government in 2010. • The Eco Region Prospectus. See P13 for a summary of all the following issues. See P39 for a chapter on Eco Quarter: the Emerging Concept Thames Gateway. Eco Region: a prospectus, November 2008, Communities and Local Government http://www.communities.gov.uk/publications/thamesgateway/ecoregion • Towards Water Neutrality in the Thames Gateway, November 2007, The Environment Agency www.environment-agency.gov.uk/subjects/waterres/287169/1917628/?lang=_e • The Parklands Vision, October 2008, Communities and Local Government www.communities.gov.uk/publications/thamesgateway/parklandsvision • The Climate Change Bill, became law on 26th November 2008 (Climate Change Act 2008) www.defra.gov.uk/environment/climatechange/uk/legislation/ It sets out targets for dramatic reductions in greenhouse gas emissions – by 80% by 2050 from a 1990 baseline • Sustainable Energy, the 2007 Energy White Paper www.berr.gov.uk/whatwedo/energy/sources/renewables/strategy/page43356.html • In December 2008 the Government published Definition of Zero Carbon Homes and Non-Domestic Buildings: Consultation www.communities.gov.uk/planningandbuilding/theenvironment/zerocarbonhomes/ The Government is consulting on the target for all new homes to be zero carbon from 2016 • Zero Waste Places, October 2008, DEFRA launched an initiative with local authorities to pilot the concept of Zero Waste Places. Objectives and visions set out in the emerging North Kent Multi Area Agreement should be considered as a supporting document for policies for Medway. Through this document there is the potential to address key transport and air quality challenges (section 4.11 of this document). In addition Medway Council's "State of Medway Report: Water Supply" (November 2008) provides a good breakdown of the requirements relating specifically to water resources from several policy documents. This document	Noted

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Scoping Report	Consultee Comments	Response
13 & 7	construction waste (commercial industrial waste) and hazardous waste. In terms of demolition and construction, we would wish to see a commitment to high rates of recycling of demolition materials and measures to incorporate recycled materials within the construction. Some developers and construction companies are already achieving levels of recycled material of 20% in their projects. It is noted that Medway has not considered Hazardous Waste within this scoping document.	the Final Version of the Scoping Report issued April 2009
Prudent use of natural resources	Further suggested indicators should be: The percentage of recycled material used in construction or the number of developments using over 20% recycled materials in construction. Within Objective 5 the Code for Sustainable Homes (CFSH) Indicator should be more ambitious. High Levels of the Code are readily achievable and Building to a high level will assist in demonstrating high standards of design and sustainability. Objective 5 should set the bar higher and record the Number of new buildings reaching CF5H 4 or above. Within the emerging LDF we would like to see that as a minimum, a commitment is made to the glide path specified in 'Building a Greener Future' (that is code level 4 by 2013 and code level 6 by 2016). Objective 5 could be expanded to measure percentage or number of commercial developments that meets BREEAM 'excellent'. Also within Objective 5 a further indicator would be the number of other waste treatment/recovery facilities.	Noted and the reference to the CfSH amended in the Final Version of the Scoping Report issued April 2009
Water Resources	Water resources are already under stress in the Thames Gateway and further growth in Medway Council could worsen this problem. The Southern Water final business plan application to OFWAT expected April 09 will not provide all of the answers alone. We recommend a water cycle strategy that will assess the capacity of the environment and existing infrastructure to respond to increased demand from new development, and identify a programme and timing of new water supply and waste water infrastructure measures. This will address concerns raised in Paragraph 4.12.2 that over abstraction is a problem and provide recommendations about how Medway can achieve Water Neutrality addressing section 4.15. The Thames Gateway Eco Region Prospectus November 2008 commits CLG and partners to the following action: As a next step towards water neutrality, we are conducting a follow on study to determine in more detail costs and benefits for	Noted & acknowledged in the SA

Scoping Report	Consultee Comments	Response
	achieving water neutrality in the eco-region. The Water Resources section of 4.15 would benefit from acknowledging the range of mechanisms to improve water efficiency. We would like to see a commitment to high levels of the Code for Sustainable Homes and BREEAM within the document. The Water Framework river basin classifications identified in the River Basin Management Plans should be incorporated into any assessment of river quality. Sustainability issue – Objective 3 (page 25) should make reference to the EU standards of the Water Framework Directive (WFD). The Water Framework Directive sets a target of aiming to achieve at least 'good status' in all waters by 2015 or, where justified, by 2021 or 2027. Further suggested indicators would be the number of properties retrofitted/No of businesses retrofitted and the number of new dwelling benefiting from rainwater harvesting.	Noted & acknowledged in the SA The suggestion is noted but it has not been included within the framework as currently there are no statistics collated on this or any intentions to
Flood Risk	The term "worst effects" is not defined. As such rather than use this term we would suggest that it is stated that "parts of Medway area vulnerable to flooding from a number of sources i.e. tidal, fluvial, surface water and sewer flooding". It isn't clear where these figures have come from. Assuming they are correct we would suggest to make it clearer the text should read "1551 properties at risk from a "in 1000 year event and 1363 properties at risk from a 1 in 100 year event". Is the Council absolutely certain that this flooding is just as a result of fluvial flooding? It should also be stated within this section that a sequential approach to building in the floodplain will be used and that areas of little or no risk of flooding will be developed in preference to those at highest risk. We support your proposed sustainable drainage (SUDS) indicator in objective 4. SUDS should be employed as primary means of managing surface water from all	Noted and para 14.5.7 amended within the Final Version of the Scoping Report issued April 2009 Noted and amendment incorporated into text of the Final Version of the Scoping Report issued April 2009 Noted

Scoping Report	Consultee Comments	Response
	new developments. This would not only ensure reduction in surface water run-off but would also improve the water quality. There may be biodiversity benefits as well, depending on the type of SUDS selected, e.g. swales and attenuation ponds. It should be stated within this Objective (3&4) that "A sequential approach will be applied to development and flood risk at all stages of the planning process. Where, exceptionally, development in flood risk areas does go ahead, the development itself must be made safe whilst making the most of all opportunities to reduce flood risk overall."	Noted and incorporated in suggested objectives on page 28 of Final Version of Scoping Report issued April 2009.
Energy	In order to ensure that energy use and carbon dioxide emissions are reduced, development should seek to reduce the inefficiencies in energy supply and use the lowest carbon producing energy technologies. Community energy systems for heating and cooling allow primary energy resources to be processed, distributed and used more efficiently than generation at either a centralised or micro scale. However it is possible that power may be most efficiently produced from a centralised location. Industrial symbiosis should be encouraged between neighbouring developments in order to improve resource efficiency. This may include the trade of materials, energy, heat, water and other by-products, maximising the embodied energy therein. E.g. Barking Riverside.	Noted
Housing	Requirements for new development will not purely be sufficient to reduce water and energy consumption in Medway. Retrofitting existing building is essential for future adaptation for both houses and businesses. Retrofitting could also decrease the costs of household and business bills and help to reduce the impact of the current economic strain. This should be included as part of the LDF.	Noted
John Sharkey on behalf of the University for the Creative Arts (23/01/2009)		
Objective 15,16 & 9	The University looks forward to continuing to work with the Council, and others, to	Noted

Scoping Report	Consultee Comments	Response
	improve the skills of the area's residents, and to increase the level and value of jobs in the area, particularly in the creative and cultural industries.	
Objective 13, 5 & 2	The University looks forward to working with the local planning authority to ensure that emerging planning policy documents encourage the improvement of energy efficiency in existing and new buildings.	Noted
Sustainability Framework	It is disappointing that there is no Sustainable Development Principle dealing with (higher and further) education, particularly bearing in mind the importance attached to (higher and further) education in the emerging South East Plan, in the Kent and Medway Structure Plan 2006, in the Council's Community Plan 2007–2010, and in the Council's Medway Regeneration Framework.	Objective 15 includes suggested indicators covering the proportion of the working age population with qualifications
Appendix 1	It is disappointing that no regard has been had to the plans of the various higher and further education institutions referred to in the main body of the document.	Medway's Community Plan and its references to training for all ages are mentioned within this.
Natural England (20/01/2009)		
Section 4.10	Whilst many of the Ramsar Sites are of importance for their waterfowl, Ramsar sites are important wetlands for other species including their plant and invertebrate communities. The network of Natura 2000 sites across member states of the European Union comprises the Special Protection Areas and Special Areas of Conservation. Whilst Government Policy treats Ramsar Sites as if they were European sites in terms of their protection and management, they do not form part of the Natura 2000 network.	Noted and amended
Map 1	For ease of reference, it may be better to amend the shading of the various designated nature conservation sites on Map 1 as it is difficult to see the individual Sites of Special Scientific Interest, Ramsar Sites, Special Protection Areas and Special Areas of Conservation.	Noted and considered but unfortunately no alternate way found which was significantly clearer
Table 4	As the undertaking of condition assessments for Sites of Special Scientific Interest (SSSI) is a rolling programme, it would be sensible to insert the date at which the figures for the percentage of the SSSIs meeting the public service agreement target were downloaded.	Current at the time of the original publication and checked before the final version of the scoping report went out in April 2009
Other biodiversity features	In addition to the internationally, nationally and locally important nature conservation sites within Medway Unitary Authorities jurisdiction, the area supports a number of habitats of principal importance ¹ and Biodiversity Action Plan (BAP)	These other designations and non-designated sites in terms of biodiversity were mentioned within

Scoping Report	Consultee Comments	Response
	priority habitats (both at the National and County level). Similarly, Medway supports populations of a number of protected species, species of principal importance1 and BAP species (both at the National and County level). We are fortunate in Kent and Medway that significant amounts of baseline data are currently available without the need to undertake specific surveys. For example the Kent Habitat Survey data includes details of the various different habitats covering the County and the Kent and Medway Biological Records Centre2 should be able to provide you with records for protected species, species of principal importance and BAP priority species. Consequently Natural England recommends the baseline data is amended to incorporate reference to these biodiversity assets within Medway. Natural England welcomes the inclusion of the condition of the key landscape characteristics of Kent landscape characters within Medway. However it is disappointing that more emphasis is not placed on the nationally important landscape of the Kent Downs Area of Outstanding Natural Beauty (AONB), part of which lies within the boundary of the Unitary Authority. Consequently we recommend the baseline is amended to incorporate further information on the Kent Downs AONB.	the original Scoping document and carried forward into the final version of the Scoping Report issued in April 2009 Para 4.10.9 of the Scoping Report is specifically in relation to the Kent Downs AONB
Objective 1	We welcome the recognition that indirect pressures on biodiversity habitats need to be considered, but the direct effects also need to be fully considered. Natural England welcomes the need to consider biodiversity outside of international, national or local nature conservation or landscape designations in Objective 1. One additional challenge, however, that should be included within this section is the need to provide measures to allow biodiversity to adapt to the effects of climate change. We also recommend that Objective 1 is modified to include reference to the direct and indirect impacts upon the nationally important landscape within Medway.	Noted and amended within the Final Version of the Scoping Report issued April 2009
Sustainability Framework – biodiversity, flora and fauna	Protection of the Natural Environment – Biodiversity, Flora and Fauna Additional indicators that Natural England would recommend for inclusion in this section are as follows: - o The area of land within Medway covered by agri-environment schemes - o Populations of protected species, species of principal importance and BAP priority species	Noted and indicator included in Final Version of the Scoping Report issued in April 2009

Scoping Report	Consultee Comments	Response
Framework – climatic factors	o The area of accessible natural greenspace within Medway Natural England recommends that the target for buildings to meet Level 3 of the Code for Sustainable Homes should apply to both new and retrofit homes (as is the case for Objective number 6)	Noted and incorporated in the Final Version of the Scoping Report issued in April 2009
Framework – material assets	Natural England generally welcomes the proposed indicators in this section but would recommend that an additional one is included relating to the provision of accessible natural greenspace. An example of such an indicator could be „The proportion of Medway residential properties meeting the Accessible Natural Greenspace Standards. These standards state that: - o All residents should live no more than 300m from their nearest area of natural greenspace of at least 2ha in size. - o That there should be at least one accessible 20ha site within 2km of home. - o That there should be one accessible 100ha site within 5km of home - o That there should be one accessible 500ha site within 10km of home.	Noted and indicator incorporated in framework of the Final Version of the Scoping Report issued in April 2009
Framework – culture, heritage and landscape	It is disappointing that no indicators have been included in this section regarding landscape, either at the local level or for nationally important areas such as the Kent Downs Area of Outstanding Natural Beauty (AONB). Consequently we recommend an indicator is included against which the effectiveness of the sustainability appraisal can be measured.	This objective within the framework was focused on the built heritage of the area
SEERA (20/01/2009)		
	The relevant regional plans, policies programmes and strategies are referenced in table 2. However you may wish to include the South East Plan Implementation Plan and the Regional Economic Strategy Implementation Plan in the table. Implementation/delivery may become more important during stage B and C of the appraisal.	Noted
	The use of the Regional Sustainability Framework as the basis for developing the SA objectives is commendable.	Noted
Theatres Trust (23/01/2009)		
General	The Theatres Trust wishes to be assured that the Local Development Documents are robust enough to include specific guidance on protecting and encouraging arts and cultural provision. We are therefore pleased to note that in Appendix 1	Noted; the importance of cultural and recreational activities is incorporated in the Core Strategy

Scoping Report	Consultee Comments	Response
	on page 56 the Medway Regeneration Framework has been quoted for the provision of outstanding cultural facilities alongside celebrating existing heritage and identity. Increased and sustainable participation in cultural and recreational activities should be encouraged by local authorities, public agencies and their partners through Local Development Documents and other measures to improve the overall standard of fitness, enhance cultural diversity and enrich the overall quality of life. Likewise the Medway Economic Development Statement is quoted on page 58 to firmly establishing Chatham as a city centre of cultural and leisure activities.... The encouragement of these facilities in town centres will help deliver sustainable development by promoting economic growth, improving accessibility and offering genuine choice for consumers through high density and mixed-use development that recognises the importance of high quality design. Planning Policy Statement : Delivering Sustainable Development (PPS1), repeats these themes for achieving sustainable development.	

Initial SA	Consultee Comments	Response
CB Richard Ellis on behalf of Land Securities Group Plc (July 2009)		
General	General comment relates the need for the next version of the document to articulate in a greater level of detail – based on robust and credible evidence – the rigorous assessment of its spatial options for accommodating growth, to ensure that the statutory requirements of the Sustainability Appraisal process are met.	This was incorporated through the introduction of a chapter called Appraisal of Alternatives, within the Interim Sustainability Appraisal and also section 4 of the final document, which also covers this.
Lodge Hill, Chattenden	We also consider that the reference to 70,000 sqm of employment within the Sustainability Appraisal is arbitrary; the approach to the quantum of employment floorspace should be based on the approach expressed elsewhere within these representations	Noted.
Paragraph 4.456	Paragraph 4.456 relates to sustainability standards. We consider that the Core Strategy should reflect the Code for Sustainable Homes national timetable more fully, to include that relating to the period up to 2016 (i.e. 2010 onwards – Code 3, and 2013 onwards – Code 4).	The question being asked was to gauge whether these were applied or more ambitious targets were applied.
Question 90	Question 90 asks what headline sustainability principles should be applied in planning the settlement. We consider that the approach should reflect that set out in PPS1: Delivering Sustainable Development and Planning Policy Statement: Planning and Climate Change – Supplement to PPS1. We consider that given the anticipated 'life' of the Core Strategy, the emerging policies need to be sufficiently flexible to ensure delivery in the medium and long term, to respond to changing standards and emerging technologies.	The question being asked was to gauge whether these were applied or more ambitious targets were applied.
Paragraph 5.18	In the context of the parameters for assessing the alternative options for accommodating growth, the final bullet point of Paragraph 5.18 states that other than the base option, each option is of a size that could be a substitute for the proposed new settlement at Lodge Hill. We have significant reservations about the validity of this assumption. It would appear to us from a review of the relevant SLAA submissions that the scale (hectares) of the four alternative options for accommodating growth are not sufficient to substitute the scale of development that could be accommodated at Lodge Hill, and to accommodate Medway	Noted. The alternatives are considered strategically- issues around land acquisition are not entered into at this strategic level of appraisal.

Initial SA	Consultee Comments	Response
Paragraph 5.26, 5.27 and 5.40	Council's growth requirements. This also applies to Paragraph 5.23 , which states that around 200 hectares of land would be required to make up for the 'loss' of Lodge Hill, and other references made to substitution (e.g. Paragraph 5.36) within this section of the Issues and Options report, for the reasons set out above. We consider that the Council should liaise with Maidstone Borough Council to understand its position in terms of housing land supply (with reference to Paragraphs 5.26 and 5.27). With reference to paragraph 5.27, for the purpose of clarity, if a development at Capstone Valley was increased in size by virtue of extending further southwards into Maidstone, this would not contribute towards Medway Council's housing requirements. We assume that the numerical points set out under Paragraph 5.40 are in no order of preference. However, in the context of the requirement for the Core Strategy to be in general conformity with the RSS, and a number of key principles enshrined within national planning policy, in our view there are a number which should be afforded greater weight. These are 1 (general conformity with the SEP); 7 (greenfield or previously developed land); and 9 (impact on regeneration strategy for the urban area). It may also be appropriate for the Council to consider including a criterion relating to deliverability within the Plan period.	The Capstone option was assessed within the Initial SA Report on the basis of the area that was within Medway Authority's boundary. Additionally discussions were had with Maidstone Borough Council, where a submission had been made for one of their documents relating to the other side of the site. Their future plans and approach to the area was that they wished it to remain as a green lung to Maidstone and a strategic gap between the towns.
Natural England (17/09/2009)		
HRA	We are not aware that any assessment under the Conservation (Natural Habitats &c.) Regulations 1994 (as amended) has taken place for the Issues and Options consultation. The Habitats Regulations assessment of the Council's Core Strategy should be started as early as possible in the Core Strategy process and should be used to inform the Council's preferred options. Natural England would be happy to provide help and assistance to the Council in all stages of the assessment process.	Ongoing conversations have occurred during with Natural England through the production of the accompanying HRA report, as well as consultations with interested stakeholders.
Housing	Natural England would expect any housing or regeneration to be of the highest standards in environmental sustainability terms, appropriately located to avoid impacts on the natural environment (in particular, statutory nature conservation sites and the Kent Downs AONB), and contribute to the provision within Medway of multi-functional green infrastructure in accordance with the South East Green	The options appraised were prioritised to focus on those type of developments which were likely to have the greatest impact and where locational issues could be

Initial SA	Consultee Comments	Response
Economy	Infrastructure Framework. Natural England would expect any economic development to be of the highest standards in environmental sustainability terms, appropriately located to avoid impacts on the natural environment (in particular, statutory nature conservation sites and the Kent Downs AONB), and contribute where possible to the provision of multi-functional green infrastructure in accordance with the South East Green Infrastructure Framework.	taken into account The options appraised were prioritised to focus on those type of developments which were likely to have the greatest impact and where locational issues could be taken into account
Leisure, Culture and Tourism	Natural England is pleased to see the recognition of tourism opportunities afforded by environmental assets, including the internationally designated nature conservation sites of the Thames and Medway Estuary and Marshes. Although we are glad to see recognition of potential human pressures on designated nature conservation sites, we would like to see greater recognition of the potential sensitivity to disturbance of nature conservation interests and the consequent need for nature conservation sites to be well managed in order to ensure that their special interest is not damaged. Preservation and enhancements of landscapes (by reference to landscape character assessment) is important to promoting and sustaining tourism in Medway. Preservation and enhancement of landscape character and biodiversity resources in the Thames and Medway Estuary and Marshes could make a vital contribution to tourism in Medway as long as visitor pressure on these internationally important nature conservation resources is sensitively and sustainably managed.	Noted. This is a matter that is given further attention in the HRA report accompanying the draft Core Strategy Submission.
Climate Change	Natural England would support an emphasis on designing in environmentally sustainable building techniques in new developments as a proportionate response to assist climate change adaption strategies.	Noted, this is also a matter for the Development Management DPD.
Lodge Hill	Development at Lodge Hill, as presently envisaged, would involve the provision of 4,500 new dwellings in close proximity to the nearby internationally protected Thames and Medway Estuary and Marshes SPA and Ramsar Sites and the SSSI at Chattenden Woods. This number of dwellings could have the potential for significant recreational and other human pressures on the vulnerable nature conservation interests. Achievable delivery of this number of houses would need to show that there would not be an adverse effect on the conservation integrity of the nearby internationally protected sites and that the interest features of the Chattenden	The impact of the development on international habitats is considered through the HRA of the Core Strategy and the capacity of the site specifically will be considered through the application process. The impact on biodiversity more generally are considered in the SA under the Biodiversity indicator and

Initial SA	Consultee Comments	Response
	Woods would not be damaged. As the Issues and Options report indicates at paragraph 4.21, the projected total of houses for the South East Plan period is in excess of 3,000 over the plan period's required provision. We would request the Council give careful consideration to whether the proposed Lodge Hill redevelopment area can sustain the number of projected dwellings considering the nearby vulnerable nationally and internationally protected nature conservation sites. We would also request that the Council gives careful consideration as to whether the landscape could absorb a development of a size and scale that 4,500 dwellings would entail without a significant detrimental effect on the local landscape character and resource.	in section 5 of eth SA Report.
	The Council should use any Lodge Hill development as an exemplar for sustainable development considering its location in the Thames Gateway Eco region. In light of Natural England's concerns over the ability for species, habitats and landscapes to adapt to the effects of climate change, we would urge the Council to consider requiring energy saving and reduction technologies and measures incorporated to a standard over and above the usual required planning and building regulation control standards. We would also suggest that the Council requires a significant proportion of on-site renewable energy generation for the same reasons. In order to promote a sustainable balanced mixed community, Natural England would like to see sufficient retail and employment services provided on site to reduce use of the private car and thereby contribute to carbon reduction. With a development of anything like the scale proposed, Natural England would wish to see extensive on-site provision of high quality, multi-functional green infrastructure as a guiding sustainable development principle. We would refer the Council to the South East Green Infrastructure Framework for guiding principles. Considering the nearby designated nature conservation sites and their vulnerability to recreational and other human disturbance, the nature and extent of on-site green infrastructure planning and provision would be a vital tool in reducing the potential for significant effects to be caused to protected nature conservation interests.	Noted. The more detailed matters are also considered in Council's Development brief for Lodge Hill, which has been considered in undertaking this SA.

Initial SA	Consultee Comments	Response
RSPB (17/09/2009)		
Housing	The RSPB considers that the economic downturn provides Medway Council with an opportunity to reconsider the environmental appropriateness of the current urban regeneration emphasis. We are particularly concerned with proposals to focus housing delivery within the Medway urban area at riverside sites. The number and scale of waterfront developments are likely to have a negative impact on the Medway Estuary and Marshes SPA. Of particular concern is the Chatham Docks site, which is located adjacent to Medway Estuary and Marshes SPA. The development has the potential to result in a number of impacts that could potential damage the SPA, including from land and/or water-based recreational activities. We strongly recommend that the riverside sites be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	Concerns noted, however the majority of the riverside regeneration sites within the Core Strategy have already been granted planning permission. Notwithstanding, these sites are considered in further detail in the HRA report.
Options	We recognise that the Sustainability Appraisal of the Core Strategy has evaluated the housing options and has concluded that "In terms of the spatial options being used to accommodate housing, there are similarities between Lodge Hill, Chattenden and the Extended Hoo options in that they would have a beneficial effect on social, economic and also environmental objectives". This statement is of significant concern given that Hoo is presently less than 500 metres from the Medway Estuary & Marshes SPA and the Lodge Hill, Chattenden site is potentially within 3km. The introduction of up to 5000 additional homes in either of these locations could significantly increase recreational pressure on the European Sites. Without having undertaken technical studies to investigate the existing and potential future recreational pressure on the European Sites, it is not clear how the conclusion of the SA/SEA has been reached. We recommend that as part of the appraisal of housing options, Medway should liaise with Natural England in respect of the specialist work that is being undertaken to investigate the existing and predicted recreational pressures on the internationally designated sites. We also strongly recommend that the above matters be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	Concerns noted. The HRA has considered in detail the effects of the Lodge Hill site on the European sites, considering potential air quality, water quality and recreational disturbance impacts. Consideration has also been given to the development brief for the site and the proposed master plan for the site. The HRA (in consultation with RSPB, Natural England and KWT) and the SA has sought to make recommendations to various policies with the Core Strategy to ensure there are no significant impacts on the European sites. Please refer to the HRA report for further detail.

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Scottish Power (17/09/2009)		
Economy - Question 30	The principle of this initiative is supported. However, where mixed uses are proposed they shouldn't prejudice existing or future expansion of industry. The scope of such an initiative should not only be concerned with raising capacity, it should also be needs based, properly focused and support employment uses at locations that are sustainable. It should also recognize that certain areas offer greater sustainability advantages than others.	Noted.
Economy - Question 31	The principle of this initiative is supported. However, the emphasis should not only be on raising capacity, it should also be needs based, properly focused and support employment uses at locations that are sustainable. It should also recognize that certain areas offer greater sustainability advantages than others.	Noted.
Barratt strategic (18/09/2009)		
	As indicated in our response to question 96, we feel there is an alternative option that should be tested. This would comprise a reduced scale of development at Chattenden, as we only believe it can deliver 3000 units maximum during the current plan period. The residual 2000 should be carried over to the next plan period. In addition to the above a reduced scale of development equivalent to a mini extended Hoo should be assessed. This could provide for 1500 units in and around Hoo, St Werburgh, High Halstow and Cliffe Woods.	Concerns noted. Please refer to section 4 of the SA report that explains why a lower level of development was not considered reasonable or realistic. To reduce the scale of the development at Lodge hill would reduce the viability of the site in terms of meeting the infrastructure requirements (especially public transport) needed to serve a sustainable development in this location. The dispersion of this development to other areas in the Hoo would also reduce the regeneration opportunities provided y 1 large strategic development.
Question 95	The initial sustainability appraisal (July 2009) also indicates that this solution would make a positive contribution to the economic competitiveness of the area,	Noted, however the Council has selected its preferred option in

Initial SA	Consultee Comments	Response
	maintaining and developing the workforce, as well as improving educational achievements, beginning in the short term and continuing into the medium and longer term. There may also be some potential for some benefit from this solution to conserving and enhancing the historic environment and other material assets of the area. Furthermore we note that the initial sustainability appraisal indicates at para 3.51 that the development of an extended Hoo would still preserve the space between the villages that would make up the extended Hoo area. To conclude Barratt Strategic feel that the councils assessment of the extended Hoo site is flawed. We do not feel the impacts upon the area are as severe or negative as proposed by the council. Many of the issues are capable of being addressed during the course of design process and thus are capable of mitigation. The initial sustainability appraisal is a lot less critical of the effects of development in this area, and we would suggest the council review their position having regard to the above.	accordance with other factors, not only the results of the Sustainability Appraisal. Notwithstanding, the findings of the SA of alternatives hold.
Trenport (18/09/2009)		
	The right options have not all been considered. A further option which should be considered is the option of expansion of the village of Cliffe, as proposed by Trenport. This could be either on its own or as part of a strategy to locate additional housing at key rural service centres, such as Cliffe, to maintain the level of shops and other rural services in the villages and maintain their relative levels of sustainability (see comments on Question 52). This could possibly form part of a variation to Option 2 Expanded Hoo (village 'cluster') to include Cliffe. For the reasons set out in the response to Question 52 the option of effectively stopping any further development at village such as Cliffe would mean that the level of rural services will decline making them less sustainable.	This option is not considered to be a reasonable or realistic alternative to the development of Lodge Hill. Any significant expansion of the village of Cliffe would require development of greenbelt land and would overwhelm the existing village.

Interim SA	Consultee Comments	Response
CB Richard Ellis on behalf of Land Securities Group Plc (09/12/10)		
General	Land Securities seeks clarification on the status of the consultation document - is the intention for it to be a combined Sustainability Appraisal and Strategic Environmental Assessment? If so, the title of the document and its content should be amended as appropriate. Furthermore, it is considered that where relevant, compliance with the SEA Directive should be highlighted at appropriate points within the document so that it is clear that the requirements of the SEA Directive have been adequately addressed.	The title of this Report now identifies that the SA incorporates SEA. Paragraph 2.4 in this Report provides clarification on the incorporation of SEA. Compliance with requirements of the SEA Directive will be highlighted in the final SA Report that will accompany the draft submission Core Strategy.
Chapter 2	Chapter 2 of the ISA sets out, amongst other things, the consultation that has already taken place leading up to the publication of this iteration of the ISA for consultation. It is considered that, for reasons of best practice and transparency, the consultation process should be fully documented within the ISA, together with a summary of/commentary on the consultation comments that have been taken into account in producing this consultation document.	Consultation responses to the Interim SA are included in this Report and will be summarised in the final SA Report.
Para 3.1	The appraisal methodology in paragraph 3.1 identifies the guidance followed for the assessment. It is noted that the guidance referred to is the ODPM (2005) "A Practical Guide to the Strategic Assessment Directive". We understand more recent guidance has been prepared by the Planning Advisory Service on managing the SA process for Local Development Frameworks (LDFs) (available at www.pas.gov.uk), which may be useful as the ISA evolves (dependent on whether it is to be progressed as a joint SA/SEA and therefore which regulations the document must comply with).	The updated guidance is now referred to in this Report.
Para 3.32	Paragraph 3.32 of the ISA notes that many town centre areas and main urban routes are now covered by Air Quality Management Areas (AQMAs) and that as the town centres are to be the focus of much future development a higher proportion of the resident population could consequently be living within areas of	Noted, good air quality should be aspiration for all new development. Further information is provided in section 5 of the SA report to give

Interim SA	Consultee Comments	Response
	poor air quality. The text then goes on to note that all development will therefore need to take this fully into account to avoid a worsening situation. Land Securities queries whether this is an issue for all [our emphasis] development, given that the spatial vision within the Core Strategy seeks, inter alia, to allocate land for development outside existing town centres (for example the creation of a new settlement at Lodge Hill).	further attention to this issue.
Para 3.38	The importance of the preservation and appropriate management of designated biodiversity sites is the subject of paragraph 3.38. Land Securities agrees with the principle of preserving and managing areas that are important for biodiversity, however considers that this paragraph would benefit from being amended to recognise the approach within Draft Core Strategy Policy CS6, which provides the caveat that where a negative impact on recognised wildlife habitats or other biodiversity features cannot be avoided, environmental compensation should be sought.	Noted.
Para 3.45	Paragraph 3.45 and Paragraph 3.46 note that consideration has not yet been given to whether the Core Strategy objectives and the SA objectives are compatible in the context of implementation. Land Securities considers that it would be worth clarifying that this is something that will be included in the next iteration of the ISA, and that this exercise should be undertaken at this time. This would be prudent given PPS12's emphasis on deliverability in the Plan-making process, and having regard to the comment within Paragraph 3.46 that because no consideration has been given so far to the exact implementation possibilities none of the strategic objectives are currently entirely complementary in terms of the SA objectives. Land Securities is also of the view that it would be helpful to provide a full definition of "implementation possibilities" within the ISA, so that it is clear exactly what is meant by this term.	Disagree - Appraisal of strategic objectives is purposely high-level. Implementation is dealt with where appropriate in the policy appraisal.
Para 4.22	Paragraph 4.22 of the ISA confirms that the main emphasis in terms of any potential alternative locations is their ability to meet additional [housing] requirements, not to replace urban sites. Land Securities considers this text would benefit from being re-worded so that it is aligned with the spatial strategy the Council is pursuing within Medway, and the importance placed on the redevelopment of the Lodge Hill site as part of the Council's strategic vision to deliver the necessary level of growth.	Noted, further detail on alternatives is provided in the Final SA Report.
Para 4.24	Paragraph 4.24 confirms that over the longer term, Lodge Hill would make the	Noted and amended.

Interim SA	Consultee Comments	Response
	greatest contribution overall towards achieving the sustainability objectives. The text then goes on to note specific harmful impacts that "could be anticipated" from the Lodge Hill development to air quality through biomass boilers, and an increased demand on water supplies. Land Securities does not consider that the text regarding the "anticipated" harmful effects is necessary, as it is based on assumptions rather than evidence. With regard to air quality, the text assumes that biomass boilers would be incorporated into homes, whereas this is not the preferred heat energy strategy. Furthermore, in response to the assumption that an increased demand on water supplies will constitute a harmful impact, it is worthy of note that any growth will incur increased demand but with the concentration of the growth in one location the ability to improve the delivery network and primary infrastructure would be both contained and manageable. It is considered that dispersed growth would be much harder to support.	
Paras 4.27 and 4.30	We note there are a number of references to Lodge Hill as Chattenden within the text of Paragraphs 4.27 and 4.30 of the ISA. Land Securities considers, for consistency, that the site should be referred to as Lodge Hill throughout the document.	Noted and amended.
Chapter 5	Land Securities welcomes the introduction of a summary matrix of the Core Strategy policies, and considers this to be a helpful aid. However, it is noted that the Transport and Movement Chapter Matrix (Policy CS24) is missing from the summary matrix. Furthermore, the title of the matrix on page 21 reads "River Medway Chapter Matrix" however the policies relate to the Area Policies Chapter (which is then duplicated on page 22).	Noted and amended.
Chapter 5	Within the Area Policies Chapter Matrix on page 22, it is noted that the numbering of the policies is inconsistent with the Draft Core Strategy. Most notably, Lodge Hill is referred to as Policy CS31, when in fact it is Policy CS33 within the Pre-Publication Draft Core Strategy to which this ISA relates. It is therefore not possible to accurately interpret the matrix "scores" in relation to the Lodge Hill site, as it is unclear whether reference should be made to where Lodge Hill is noted within the matrix, or to Policy CS33.	Noted and amended.
Paras 6.5 & 6.8	Paragraph 6.5 of the consultation document discusses the air quality situation without the Core Strategy, however references a number of initiatives in the Third Local Transport Plan "which the Core Strategy will help implement". It is considered that this text would benefit from being revised to ensure it refers to the	Noted, addressed in final SA Report.

Interim SA	Consultee Comments	Response
	situation without the Core Strategy only. Paragraph 6.8 states that "Though Lodge Hill is intended as an exemplar of sustainability, it will intensify the use of the existing site and could increase substantially the number of people and cars located on and attracted to the Peninsula." Land Securities considers that as currently drafted, this text provides an unbalanced view. To rectify this, it is considered that reference to the sustainable transport measures required by the Lodge Hill Core Strategy Policy (CS33) could usefully be made here, including commentary on the policy requirement within CS33 for early provision of high quality and high frequency bus services, and measures to actively promote sustainable transport.	Noted, however the development of Lodge Hill will undoubtedly increase the number of people and cars on the peninsula. The SA makes note of the mitigation measures proposed.
Para 6.56	It is noted that Paragraph 6.56 states that Lodge Hill would place "some pressure on biodiversity", and that "recreational pressures from the new population will have an effect on biodiversity". It is considered that these references should be omitted from the document on the basis that they are unsubstantiated. Paragraph 6.66 of the draft SA explicitly recognises that "there is no strong evidence to suggest that there will be significantly greater recreational pressures on the area". In the context of LDFs having to be fundamentally underpinned by a robust and credible evidence base, it is considered that assumptions such as the ones made with regard to recreational pressures should be removed from the text of the ISA.	There have been reported declines in the numbers of important bird species in the three north Kent Special Protection Areas (Thames Estuary and Marshes SPA, Medway Estuary and Marshes SPA and The Swale SPA), in particular Medway Estuary and Marshes SPA. Studies have been commissioned by the North Kent Environmental Planning Group to identify the causes of these declines, which may include recreational disturbance. Early findings of this work suggest that there may be a correlation between recreational disturbance and bird decline and that recreational visitors tend to be from within the local area. Please refer to the HRA for further information.
Chapter 6	The first bullet point of Paragraph 6.58 confirms that protecting and conserving existing designated sites is one of a series of critical sustainability issues in terms of biodiversity, open space and landscape. It is considered that where reference is	Noted.

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	made to "existing designated sites" there is a need to define the level of designation, in recognition of the statement within Paragraph 5.67 of the Draft Core Strategy which confirms that "In PPS7, the Government no longer accepts the need for local designations that may unduly restrict development and economic activity". Draft Core Strategy Policy CS7 is also consistent with this approach, insofar as it states that the highest degree of protection should be afforded to sites of national and international importance. Paragraph 6.66 of the ISA notes that within Policies CS7, CS30, CS32 and CS33 there is a "mention of the fact that relevant schemes with partners will only be allowed if they show that a balance will be reached between access and the other uses of the countryside". Land Securities would like to understand the reference to "partners" within the text, as it is not clear who is meant by this as currently drafted. Furthermore, Land Securities is of the view that the reference to only being allowed if a balance can be reached does not take sufficient account of all the other policy requirements and criteria. Finally, with regard to Paragraph 6.66, Land Securities considers that there may be a discrepancy with the Core Strategy policy references quoted. As identified in representations to Chapter 5 (Appraisal Summary) of the ISA, Lodge Hill has been included within the appraisal summary matrix in the ISA as Core Strategy Policy CS31 (when in fact it is CS33 in the Pre-Publication Draft Core Strategy) and it appears that this has filtered into the accompanying explanatory text. Land Securities considers that the Core Strategy policy references should be updated accordingly. The recommendation for the climate change mitigation and adaptation section of Chapter 6, set out in Paragraph 6.81, seeks the potential "tightening up" of some of the policy wording so that firmer weight is given to these elements when they are applied. Land Securities considers it to be vital that an appropriate level of flexibility is maintained within the wording of Core Strategy policies, in line with guidance in PPS12. It is particularly important in the evolving world of new technologies that sufficient flexibility is maintained to enable appropriate responses to climate change issues over the 15 year+ time horizon of the Core Strategy Plan period, as well as to take account of site-specific circumstances.	Noted, and references amended in the final SA Report. Noted- this is a matter for the plan, rather than the SA.
Chapter 7	Paragraph 7.15 of the ISA relates to the Area Policies covering the 5 towns (CS26,	Noted, comment no longer

Interim SA	Consultee Comments	Response
	CS27, CS28, CS29 and CS30), stating, amongst other things, that the importance of these towns is for access to services within the local population. It is considered that reference should also be made to the Lodge Hill site in this context, in its role as a new settlement. Draft Core Strategy Policy CS33 confirms that design solutions for Lodge Hill should have due regard to, inter alia, the need to create a well-defined "town centre" and associated neighbourhood centres serving not only the needs of the resident and working community, but also existing smaller settlements on the Hoo Peninsula, and in particular the existing settlement of Chattenden. Paragraph 7.54 explicitly recognises that a large proportion of the expected housing delivery will come from the Lodge Hill development, and that "given its importance there would be substantial concerns if there were any hindrances to it coming forward". Furthermore, Paragraph 7.55 notes that Lodge Hill will "make up the single greatest proportion of the expected housing of the area in the future." Land Securities welcomes this recognition of Lodge Hill's importance to the Council's growth agenda. The recommendation within the ISA for the housing section of Chapter 7 (as set out in Paragraph 7.57) is that confirmation should be sought as early as possible as to the number of dwellings that will be delivered on the Lodge Hill site during the whole Plan period. In response to this, we note that Draft Core Strategy Policy CS33 states that approximately 5,000 new homes will be developed at Lodge Hill, of which around 4,600 will be completed within the Plan period. Land Securities supports the inclusion of these quanta of development within Policy CS33, as they have been informed by a thorough evidence base. By way of context, Land Securities appointed a consultant team to prepare a comprehensive suite of site-specific technical reports in respect of the Lodge Hill site. This body of information was informed by (inter alia) site investigation works and engagement with key stakeholders, to inform the identification of Lodge Hill as a Strategic Allocation within the Core Strategy, and consequently forms a component part of the evidence base that underpins the Pre-Publication Draft Core Strategy. The Lodge Hill-specific information reports are the result of fact-finding/research	relevant to final SA Report. Noted. Noted. Noted.

Interim SA	Consultee Comments	Response
Chapter 8	undertaken by Land Securities and its consultant team, to establish the "baseline" position with regard to each specialist topic area, which has then been fed into and informed the indicative masterplan for the site. This transparent process has enabled a realistic and achievable quantum of development to be planned for the site (i.e. approximately 5,000 dwellings in total; around 4,600 of which are expected to be completed within the Core Strategy Plan period). Paragraph 8.11 of the ISA refers to "some small convenience and district centre scale possibilities" at Lodge Hill. It is considered that, if reference is being made to the fact that Lodge Hill will be a district centre (in PPS4 terms), this phrase could more appropriately be re-worded to read "convenience and comparison retail floorspace of a scale appropriate to the district centre". Paragraph 8.19 notes that Core Strategy Policies CS31-CS33 refer to strong vibrant economies for local people being supported, and that these would be expected to be in the rural-based sectors, such as agriculture, horticulture and woodland management or farm diversification. Land Securities queries whether it is the Council's intention to refer to the Lodge Hill site (Draft Core Strategy Policy CS33) as part of the discussion on rural-based sectors, or whether the policy numbering discrepancy issue previously identified in these representations has meant that the Lodge Hill site (Policy CS33 in the Pre-Publication Draft Core Strategy) has been erroneously included within this discussion. If it is the Council's intention to refer to Lodge Hill in this context, it is considered that Paragraph 8.19 of the ISA should also reflect Policy CS33's aspiration to create a new focus on the Lodge Hill site for higher value economic activity in a Medway context, in order to be consistent with the wording of Draft Policy CS33. Draft Core Strategy Policy CS19 is discussed in Paragraph 8.20 of the ISA. This paragraph makes reference to "two smaller scale food stores". Please refer to Land Securities' response to Policy CS19 of the Pre-Publication Draft Core Strategy for detailed comments on the scale of foodstores proposed (i.e. that they should be of a scale appropriate to their status in the retail hierarchy). Paragraph 8.25 of the ISA recommends that the employment provision at Lodge Hill should be carefully considered to, amongst other things, "ensure that it does	Noted, comment no longer relevant to final SA Report. Noted, comment no longer relevant to final SA Report. Noted. Noted, however existing comment still stands.

Interim SA	Consultee Comments	Response
	not draw people from the other nearby settlements on the Peninsula, which would be harmful to their vitality." Land Securities is of the view that this phrase should be omitted from the ISA, on the basis that Draft Core Strategy Policy CS33 makes it clear that the employment opportunities sought on Lodge Hill are to create a new focus for higher value economic activity in a Medway-wide [our emphasis] context.	
Chapter 9	Chapter 9 of the ISA summarises that the main impacts will, to a greater and lesser extent, mainly affect Gravesham, due to the location of Lodge Hill nearer to its administrative boundary. Paragraph 9.2 speculates that an increased level of traffic and congestion (and an associated slight effect on air quality) may be expected. Land Securities considers that that these statements do not sufficiently take into account the sustainable transport initiatives embedded into the text of Draft Core Strategy Policy CS33, including the early provision of high quality and high frequency bus services including bus priority measures on the highway network, and considers that Paragraph 9.2 of the ISA should be amended to reflect these.	Noted, however, as per previous comment, the scale of the development is likely to increase traffic and congestion and it would be remiss of the SA not to point this out. The situation should be closely monitored.
Chapter 9	Paragraph 9.3 states that the other noticeable impact "will be" a draw of people from nearby settlements travelling to the shops at Lodge Hill. In response to this, Land Securities firstly considers that "will be" should be replaced with "could" as there is no certainty this will happen. In addition, Land Securities notes that the wording of Draft Policy CS33 specifically includes a policy requirement that there is a need to create a well defined town centre and associated centres at Lodge Hill to serve not only the needs of the residents and workers, but also existing smaller settlements. In addition, one of the principles for delivering the vision of the site, as noted within Paragraph 11.94 of the Draft Core Strategy, is that it is "well-connected", both within the new settlement and between Lodge Hill and surrounding communities. Furthermore, a Retail Report was undertaken as part of the comprehensive suite of draft site-specific information reports prepared by Land Securities and its consultant team to inform and underpin the emerging Core Strategy. This report confirms that the quantum of retail floorspace that has fed into the indicative masterplan for the site is a response to an identified leakage of expenditure from the catchment area, and demonstrates that the quantum tested would not create an unacceptable impact upon existing designated centres. Land Securities consequently considers that the level of retail	Noted and amended.

Interim SA	Consultee Comments	Response
	floorpace identified is based on robust and credible evidence and is therefore appropriate. For all of these reasons, it is considered that the next iteration of the ISA should recognise the wider objectives for the Lodge Hill site, and deal with any potential impact in this context.	
Chapter 9	Paragraph 9.3 of the ISA goes on to note that the level of employment provision at Lodge Hill is only expected to accommodate workers from within the settlement and immediate locality, and that the employment opportunities it creates could draw people from elsewhere. As part of creating a sustainable community, Land Securities considers it is important to provide employment opportunities for local residents, however the text of Draft Core Strategy Policy CS33 seeks the use of the site for higher value economic activity for the whole of Medway. It is therefore considered that the employment opportunities at Lodge Hill are responding to an identified need for higher value economic activities and Paragraph 9.3 of the ISA should be amended to recognise this.	Noted.
Chapter 9	Land Securities welcomes the inclusion within Chapter 9 of the ISA of the written outline within Paragraphs 9.4-9.8 of the way the impacts identified may be minimised and lessened. With regard to Paragraph 9.6, which states that any impact (in a retail sense) should reduce if Lodge Hill develops as a new service centre, Land Securities notes that the inclusion of retail floorspace is critical to the proper functioning of the centre and the creation of a sustainable community, and is of the view that this should be incorporated within the text of Paragraph 9.6.	Noted.
Chapter 9	Paragraph 9.8 details a number of actions to minimise potential increases in traffic. It is considered that reference to the sustainable transport measures required by Draft Policy CS33 (Lodge Hill) could usefully be added here.	Noted.
Chapter 10	Paragraph 10.5 of the ISA confirms that the length of the Core Strategy's post-adoption Plan period is 15 years. It is our understanding that it will be slightly longer, if the Core Strategy is adopted in 2012 (as currently planned) and the Plan period runs to 2028, and that this should be reflected within the text of Paragraph 10.5.	Noted.
Chapter 11	Paragraph 11.3 refers to the fact that "The Core Strategy will ensure that a reduction of demand occurs from physical building that would not occur elsewhere". The nature of the demand is not clear from this text, and therefore Land Securities considers Paragraph 11.3 should be updated to provide	Noted & updated.

Interim SA	Consultee Comments	Response
Chapter 11	clarification. In line with comments elsewhere within these representations, Land Securities is of the view that the ISA should not refer to the occurrence of an increase in recreational pressure without sufficient evidence to substantiate such comments. For this reason, Land Securities considers that the reference within Paragraph 11.4 to the increase in recreational pressure that "will occur" should be replaced by "may occur" until such time as robust evidence indicates to the contrary.	Refer to previous response on this issue.
Chapter 11	By way of a general observation on the ISA, it is noted that there is at present no section dealing with the cumulative effects of development. Land Securities considers that this should be included within the next iteration of the ISA.	Agreed and included within Chapter 9 of this Report.

Update to Interim SA (incorporating SEA)	Consultee Comments	Response
CB Richard Ellis on behalf of Land Securities Group Plc (14/10/11)		
General	It is noted that this iteration of the ISA updates the findings of the previous version to account for any changes made to the Core Strategy between the Pre-Publication and Publication Drafts as well as including information in relation to cumulative effects. Therefore, the representations Land Securities submitted to the ISA that accompanied the Pre-Publication Draft Core Strategy remain valid.	Noted and addressed in Final SA Report
Introduction	The introductory text in paragraph 3.1 confirms that section 3 of the report provides an overview of the SA process followed. Given that the remit of the document is for an SA incorporating SEA, it is considered that detail on the process undertaken to date in respect of how the SEA Directive has been complied with should also be included.	Noted and included in Final SA Report
	The compatibility matrix following paragraph 3.16 shows the updated compatibility matrices between the Core Strategy strategic objectives and the SA framework. However, both these categories are not clearly defined. It would be helpful for text to be included alongside the table to confirm what the Core Strategy strategic objectives are, and to set out in detail the SA framework.	Noted, these are now explained in earlier sections of the SA Report.
Appraisal Summary	Land Securities welcomes the continued inclusion of a summary matrix of the Core Strategy policies, and considers this to be a helpful aid. Paragraph 5.2 sets out the key to the symbols used within the accompanying tables. It is noted that two of the categories are labelled "Potentially some benefits" and queries whether this should be amended.	Noted and corrected for Final SA Report.
Appraisal against the Environmental Indicators – Para 6.2 & 6.4	Paragraph 6.2 states that "The proposed development at Lodge Hill, alongside economic development at the Hoo Peninsula will also lead to increased traffic on the peninsula." Land Securities considers that as currently drafted, this text provides an unbalanced view. To rectify this, it is considered that reference to the sustainable transport measures required by the Lodge Hill Core Strategy Policy (CS33) could usefully be made here, including commentary on the policy requirement within CS33 for early provision of high quality and high frequency bus services, and measures to actively promote sustainable transport. Reference to air	Refer previous comments on this matter.

Update to Interim SA (incorporating SEA)	Consultee Comments	Response
	quality mitigation measures within paragraph 6.4 could also therefore usefully make reference to Core Strategy Policy CS33.	
Appraisal against Environmental Indicators – Para 6.7	Paragraph 6.7 includes a recommendation that more aspirational targets are set within the Core Strategy for the Code for Sustainable Homes and BREEAM. It is considered that this approach is not justified, on the basis that these standards are national targets.	Noted, however there is still some uncertainty around national targets and suggestion provides some certainty for Medway.
Appraisal against Environmental Indicators – Para 6.15	Paragraph 6.15 explicitly states that “Development at Lodge Hill will clearly have some adverse effects on landscape...” Land Securities considers this statement should be removed from the text of the ISA on the basis that it is not qualified by any justification. As a minimum, ‘will clearly’ should be removed, and replaced with ‘could’ to reflect the subjectivity of this statement.	Amended to ‘likely to have some adverse effects’.
Appraisal against the Social Indicators – Para 7.9	Paragraph 7.9 of the draft ISA relates to transport and accessibility, and notes that ‘Further changes have been made to Policy CS33: Lodge Hill, with less specificity given as to which transport improvements will be provided by developers.’ It is noted that, for clarity, the text should confirm that the remainder of the necessary transport improvements will be provided by alternative parties.	Noted, however comments are based on policy text.
Appraisal against the Economic Indicators – Para 8.3	Paragraph 8.3 of the ISA states that ‘A cautionary note from the previous SA still applies: that the employment provision at Lodge Hill should be carefully considered in terms of its linkages to existing businesses and to ensure that it does not draw people from the other nearby settlements on the Peninsula, which would be harmful to their vitality.’ Land Securities remains of the view that this text should be omitted from the ISA, on the basis that Draft Core Strategy Policy CS33 makes it clear that the employment opportunities sought at Lodge Hill are to create a new focus for higher value economic activity in a Medway-wide [our emphasis] context.	Noted, however this is still considered to be a potential issue .
Appendix 1	Land Securities welcomes the detailed response provided to its previous representations submitted in respect of the ISA that accompanied the Pre-Publication Draft Core Strategy. The amendments made as a consequence are welcomed, and Land Securities looks forward to the opportunity to comment on the final SA report where Appendix 1 confirms a number of its previous representations will be addressed.	Noted.
Para 1.16 of	This paragraph recognizes that the latest iteration of the Sustainability Appraisal	Please refer to Appendix 1 in

Update to Interim SA (incorporating SEA)	Consultee Comments	Response
Publication Draft Core Strategy	(SA) is being published alongside this draft version of the Core Strategy, but that a final version will assess the Submission Draft. Guidance from the Planning Advisory Service in the Plan Making Manual (September 2009) advises that 'the sustainability appraisal is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. It should be transparent and open to public participation. The sustainability appraisal should inform the decision making process to facilitate the evaluation of alternatives. It should also help demonstrate that the plan is the most appropriate given the reasonable alternatives.' Given that a further iteration of the SA is expected to be published when the Core Strategy is submitted to the Secretary of State (which will not be subject to public consultation), it is considered that the Core Strategy is not 'justified' insofar as it is will not be possible to comment on the extent to which the final SA has influenced the content of the DPD.	relation to the compliance of the SA report with regulations and legislation.
Barratt strategic (13/10/2011)		
General	The Sustainability Appraisal highlights the shortfall in affordable housing as a key sustainability issue in the district. It also indicates that the first SA objective is 'to ensure that the residents of Maidstone have the opportunity to live in a well designed , sustainable, decent and affordable home'	Believe this is a confusion due to the fact that Maidstone Borough Council also had a consultation on related to their LDF for part of the time and its closing date corresponded with that related to the Medway Core Strategy and accompanying documents.
Housing figures	Given the above (5 specific points) and having regard to the findings of the North Kent SHMA we are surprised that the SA does not assess the implications of alternative levels of housing growth	Noted. Please refer to section 4 of this SA Report.
Soundness of CS	Whilst we accept that the changes we are suggesting would require publication and consultation on a revised CS and associated changes to the Sustainability Appraisal, without these changes we believe the CS to be fundamentally unsound, and the only recourse for MC to be to withdraw the plan and for a full SA to be undertaken to test a higher level of growth	Noted. Please refer to section 4 of this SA Report as to why a higher level of growth is not considered to be a reasonable option.

Update to Interim SA (incorporating SEA)	Consultee Comments	Response
Deliverability of Lodge Hill Strategic Allocation	Whilst we accept.....(same as soundness)...and the only recourse for MC to be to withdraw the plan and for a full SA to be undertaken to a lower level of growth at Chattenden, a new strategic allocation (1500) dwellings on an extended Hoo site (encompassing Hoo, St Werburgh, and the nearby villages of High Halstow and Cliffe Woods)and/or identification of a series of reserve sites to be brought forward on a phased basis if Lodge Hill Chattenden does not deliver	Noted. Please refer to section 4 of this SA Report as to why a higher level of growth is not considered to be a reasonable option. Refer to earlier comments as to why an expanded Hoo is not considered to be a strategic option.
CS31 – Hoo Peninsula and Isle of Grain	Whilst the initial sustainability appraisal undertaken by the Council in July 2009 on the merits of the alternative strategic allocations being considered at that time indicated at Para 3.56 that the main impact of an extended Hoo would be in terms of encroachment onto greenfield land, this would, in our opinion be inevitable with any strategic development. This matter aside we note that as far as highway impact is concerned the initial sustainability appraisal indicates at Para 3.54 that an extended Hoo would have 'limited impact on traffic congestion and travel choice due to the proximity to the existing road network'. The initial sustainability appraisal also indicates that an extended Hoo "would make a positive contribution to the economic competitiveness of the area, maintaining and developing the workforce, as well as improving educational achievements, beginning in the short term and continuing into the medium and longer term. There may also be some potential for some benefit from this solution to conserving and enhancing the historic environment and other material assets of the area". Furthermore we note that the initial sustainability appraisal indicates at Para 3.51 that the development of an extended Hoo would still preserve the space between the villages that would make up the extended Hoo area. To date, despite our reps no SA has been undertaken of the effect of a reduced Chattenden and new strategic allocation of 1500 dwellings at an extended Hoo. We believe this should occur in order to demonstrate whether what is proposed in the CS is the most sound approach to development i.e. the most appropriate strategy when considered against the reasonable alternatives and thus sound.	Noted. Please refer to section 4 of this SA Report as to why a higher level of growth is not considered to be a reasonable option. Refer to earlier comments as to why an expanded Hoo is not considered to be a strategic option.
Church Commissioners (12/10/2011)		
General	It is inappropriate to fix the size of the new settlement at Lodge Hill until the	Noted, the figures are based on the

Update to Interim SA (incorporating SEA)	Consultee Comments	Response
	sustainability (including the balance of land uses) has been tested. The Church Commissioners therefore reiterate the need to take a flexible approach to the provision of sites to deliver sustainable development.	deliverability of the site and initial sustainability work, including work undertaken for the preparation of the development brief for Lodge Hill. The sustainability of the site will also need to be proven through the application/Environmental assessment process.
Cliffe and Cliffe Woods Parish Council (14/10/2011)		
Housing figure	The impact of house building of this number is likely to be underestimated and only refers to a growth of c. 22,000 (increased to c. 24,000 due to additional factors). The sustainability of this figure (impact on services and infrastructure and provision of local employment) is, in our view, not adequately covered by proposed policies.	Refer to section 4 as to why a lower figure is not considered a reasonable or realistic option. The SA process has considered the overall sustainability of the chosen figure.
Campaign for the Protection of Rural England (14/10/2011)		
Environmental capacity	Given the proposed over provision we do not consider that 5,000 dwellings at Lodge Hill is as critical as is being made out. We consider that the development potential at Lodge Hill should be reduced, given its sensitive environmental setting.	Refer to section 4 as to why a lower figure is not considered a reasonable or realistic option. The SA process has considered the overall sustainability of the chosen figure.
Dickens Country Protection Society (25/09/2011)		
Housing figure	The impact of house building on this number is likely to be underestimated and only refers to a growth of c. 22,000 (increased to c. 24,000 due to additional factors). The sustainability of this figure (impact on services and infrastructure and provision of local employment) is, in our view, not adequately covered by proposed policies.	Refer to section 4 as to why a lower figure is not considered a reasonable or realistic option. The SA process has considered the overall sustainability of the chosen figure.

Update to Interim SA (incorporating SEA)	Consultee Comments	Response
		figure.

Appendix 3





Medway Sustainability Appraisal Scoping Report (Final Version April 2009)



Amendments incorporated following the consultation period are identified in blue italics for ease of comparison with the consultation version

Sustainability Appraisal Scoping Report

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1. Introduction

- 1.1 Medway Council is undertaking production of its Local Development Framework (LDF), which is a series of Local Development Documents (LDDs) and Supplementary Planning Documents (SPDs). These will guide the development of the area until 2026, through a Core Strategy, an Area Action Plan for Chattenden, a Land Allocations and Development Control DPD and a variety of SPDs covering different areas and topics.
- 1.2 Under the requirements of the Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12, the Local Planning Authority is required to carry out a Sustainability Appraisal of its LDF to fulfil the aim of contributing towards the achievement of sustainable development through preparation of its plans.
- 1.3 European Directive 2001/42/EC 'on the Assessment of the Effects of Certain Plans and Programmes on the Environment' defines plans and programmes which require environmental assessment (article 3). It is clear from this definition that, given the scope of the proposed Local Development Documents (LDD's), an environmental assessment is required.
- 1.4 The government's approach is that these appraisals should also incorporate the requirements of and be in accordance with EU Directive 2001/42/EC on the 'assessment of the Effects of Certain Plans and Programmes on the Environment' (the 'Strategic Environmental Assessment' or SEA Directive). However, SA extends the concept of SEA to fully encompass all social and economic concerns as well.
- 1.5 There are many definitions of sustainable development, however the most commonly used and widely accepted is that within the Brundtland Report of 1987:

'Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.'

- 1.6 The aim of sustainable development is to fully integrate social, economic and environmental factors, so that we do not take resources that may be needed for future generations to survive. The UK Sustainable Development Strategy 'Securing a Better Future' (2005) and its accompanying strategic framework breaks down the definition into four key objectives, to be integrated and delivered simultaneously to achieve sustainable development:
 - Social Progress which recognised the needs of everyone;
 - Effective protection of the environment;
 - Prudent use of natural resources; and
 - Maintenance of high and stable levels of economic growth and employment.

This integration will ensure that future development meets the needs of people living and working in an area, whilst at the same time ensuring that it is sited in such a way as to protect the environment.

- 1.7 In addition, to be in accordance with the Habitats (92/43/EC) Directive, an Appropriate Assessment is required for any plan not related to management, that could affect, either on its own or in combination with any other plans or programmes, a European site. This will be considered in greater detail later during the assessment of options proposed for the Core Strategy.
- 1.8 The Scoping Report is a consultation document, the purpose of which is to describe the scope and timetable for the sustainability appraisal of the Medway Development Plan Documents.
- 1.9 The work on each appraisal runs simultaneously to the development of the LDD so it becomes integrated into the plan-making process as a way of improving the document as it develops and producing sustainable policies on the ground. By involving stakeholders and experts along the way, a robust and fully integrated appraisal should develop.
- 1.10 Consultation at this stage helps to ensure that the sustainability appraisal will be comprehensive and robust enough to support the Development Plan Documents during the later stages of full public consultation and examination. This allows stakeholders to verify that all the relevant plans have been reviewed, that the baseline information is the most up to date and that all the sustainability issues have been identified.
- 1.11 The SEA Directive and Environmental Assessment of Plans & Programmes Regulations set out a statutory process that must be followed. To show compliance with this, checklists are used. Table 1 shows which sections of this document cover the relevant requirements of the legislation, or where this is likely to be covered during the process.

Table 1: SEA Requirement Checklist

<i>Environmental Report Requirement</i>	<i>Section of Report</i>
<i>(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes</i>	Section 1 & 2 and Appendix 1.
<i>(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme</i>	Section 4
<i>(c) the environmental characteristics of areas likely to be affected</i>	Section 4
<i>(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC</i>	Section 2 & 4 and in the Appropriate Assessment to be carried out during appraisal of the options. ¹
<i>(e) the environmental objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation</i>	Appendix 1 and through the appraisal and refinement of options during the process.

¹ This will be continually reviewed throughout the process and updated as necessary.

<i>(f) the likely significant effects² on the environment, including issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archeological heritage, landscape and the interrelationship between the above factors</i>	Section 4 and throughout the appraisal and refinement of options through the process to be reported in future documents.
<i>(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme</i>	To be considered during the process and reported in future documents.
<i>(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information</i>	Section 2 and in future documents.
<i>(i) a description of the measures envisaged concerning monitoring in accordance with Article 10</i>	Suggested within Section 8 and to be developed and refined during the process.
<i>(j) a non-technical summary of the information provided under the above headings</i>	Within future documents.

1.12 The report has been prepared for consultation, pursuant to:

- Regulation 25 of the Town and Country Planning (Local Development) (England) 2004 Regulations, and
- Regulation 12 (5) of the Environmental assessment of Plans and Programmes Regulations 2004.

² These effects should be secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

2. Links to other Plans, Programmes and Strategies

- 2.1 The Directive states that the environmental statement should take account of the environmental objectives of other plans by considering:

‘the plan’s ‘relationship with other plans and programmes’ and ‘the environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan.., and the ways those objectives and any environmental considerations have been taken into account during its preparation.’
(Annex 1(a), (e))

- 2.2 All Local Development Documents and the SA / SEA Scoping Report should be framed in the context of: national, regional and local objectives. Therefore a comprehensive review of all relevant Policies, Plans and Programmes (PPPs) was carried out as part of the SA / SEA process.
- 2.3 This ensures that the sustainability objectives in the Scoping Report are not in conflict with those in other PPPs and also highlights other areas of potential conflict which may need to be addressed, for example meeting development needs whilst achieving other objectives such as for biodiversity and heritage. The compatibility of the SA framework objectives are laid out within Table 9 in section 5, later in this report.
- 2.4 Table 2 below outlines the main plans and programmes of importance to the LDF. This has been expanded within Appendix 1 to show the main aims of the plans and their relevance to the SA. The identification of these plans was done through an internal process.
- 2.5 Initially this focused on higher level policies because all Development Plan Documents are bound by tests of soundness and one of these tests is to ensure general conformity and compliance with the Regional Spatial Strategy (RSS). This has also included as many local plans as possible to ensure that the framework is targeted towards and covers the main local issues.

Table 2: Relevant Plans and Programmes

International Legislation
EEC Landfill Directive
EU Waste Framework Directive
EU Water Framework Directive (2000/60/EC)
EU Habitats Directive (92/43/EEC)
EU Strategic Environmental Assessment Directive (2001/42/EC)
RAMSAR Convention
National Legislation
Securing the Future: delivering UK sustainable development strategy
Sustainable Communities: Building for the Future
Urban White Paper: our Towns & Cities: the Future
Rural White Paper: Our Countryside: the Future.
UK Biodiversity Action Plan (UK BAP)
Bringing Britain together: A national strategy for neighbourhood renewal
A new commitment to neighbourhood renewal — national strategy action

plan
Heritage White Paper: Heritage Protection for the 21 st Century (Consultation)
UK Waste Strategy
Future Water
PPS1: Delivering Sustainable Development
PPG2: Green Belts
PPS3: Housing
PPG4: Industrial & Commercial Development & small firms
Draft PPS4
PPS6: Planning for Town Centres
PPS7: Sustainable Development in Rural Areas
PPG8: Telecommunications
PPS9: Biodiversity and Geological Conservation
PPS10: Planning for Sustainable Waste Management
PPS12: Local Spatial Planning
PPG13: Transport
PPG15: Planning and the Historic Environment
PPG16: Archeology and Planning
PPG17: Planning for Open Space, Sport and Recreation
PPG20: Coastal Planning
PPS22: Renewable Energy
PPS23: Planning and Pollution Control
PPG24: Planning and Noise
PPS25: Development and Flood Risk
Good Practice Guide on Planning for Tourism (replaced PPG21)
Minerals Planning Statement (MPS) 1
Our Coasts and Seas – making space for people, industry <i>and</i> wildlife
Marine Programme Plan 08-09 (Defra)
Climate Change Act 2008
UK Renewable Energy Strategy (Consultation)
TE2100 Consultations (upto and including Draft TE2100 Strategy)
Definition of Zero Carbon Homes and Non-Domestic Buildings (Consultation)
Regional Legislation
RPG9a: Regional Planning Guidance for Thames Gateway
RPG9: Regional Planning Guidance for the South East
Draft South East Plan
The South East Regional Sustainability Framework
Creating Sustainable Communities: Greening the Gateway
Regional Economic Strategy
Regional Housing Strategy
Regional Transport Strategy
“The Cultural Cornerstone” A strategy for the development of cultural activity and its benefits in the South East.
South East Region Social Inclusion Statement
A partnership framework for tourism in Kent & Medway:2005-2015

"Destination South East" Regional Spatial Planning Strategy for Tourism (Proposed Alterations to Regional Planning Guidance – Tourism and Related Sport and Recreation)
Climate Change Mitigation and Adaptation Implementation Plan for Draft South East Plan
Kent Biodiversity Action Plan
Catchment Abstraction Management Strategies (CAMS) in Southern Region: Medway CAMS
Medway and Swale Shoreline Management Plan
Thames River Basin Management Plan
Kent Downs AONB Management Plan
Kent Design Guide
Local Documents
"More to Medway" Medway's Community Plan 2007-2010
Kent and Medway Structure Plan 2006
Medway Local Plan 2003
Local Transport Plan 2 (2005-2010)
Medway Regeneration Framework 2006-2016
Medway Wildlife, Countryside and Open Space Strategy 2008-2016
Medway Rural Action Plan
Medway Housing Strategy 2008-2011
Kent Minerals Local Plan
Kent Waste Local Plan
Medway Council's Municipal Waste Management Strategy 2005-2020
Medway Economic Development Statement 2006
Draft Economic Development Strategy (Consultation)
Medway and Medway NHS: 2008 Joint Strategic Needs Assessment
Opportunity in the Third Age: Improving Life for Older People in Medway 2008-2011
Medway Children and Young People's Plan 2006-2009
Medway Council's Sports Development Strategy 2005-2010
Medway's Community Safety Partnership Plan 2008-2011
Kent BAP
Kent AONB Management Plan SPD (& associated SA and AA)

3. Methodology

- 3.1 This Scoping Report documents Stage A of the SA process, as set out within 'A Practical Guide to the Strategic Environmental Assessment Directive' published by the ODPM in 2005. Stage A consists of a number of tasks, which include:
- Task A1: Identifying other relevant plans, programmes and sustainability objectives;
 - Task A2: Collecting baseline information;
 - Task A3: Identifying sustainability issues;
 - Task A4: Developing the SA framework; and
 - Task A5: Consulting on the scope of the SA.
- 3.2 The other relevant plans and programmes that relate to the Development Plan and need to be considered through the SA process have been outlined within the previous section of this report.
- 3.3 The baseline situation and identified sustainability issues are covered within the following sections that have been separated into the topic areas below. This is to make the consultation process easier and to ensure that the process is fully integrated into the production of the plan.
- Community (population, crime, deprivation, health)
 - Economy and employment
 - Cultural Heritage and Material Assets
 - Housing
 - Biodiversity and open space
 - Air quality
 - Water and Soil
 - Waste
 - Transport and accessibility
 - Climate adaptation and mitigation
- 3.4 Section 4 lays out the baseline information in relation to the identified topic areas and highlights the sustainability issues that arise from these.
- 3.5 The framework objectives and indicators are then laid out within Section 5 along with modifications that were made to ensure they were of most relevance to the Medway area.
- 3.6 Section 6 then outlines the next steps in the consultation process, up until production of the final report to be submitted alongside the Core Strategy and the final section outlines issues in respect to a suggested regime for monitoring, as this needs to be considered throughout the plan production process.

4. Baseline Information and sustainability issues

- 4.1 The SEA Directive requires that *"the relevant aspects of the state of the environment and the likely evolution thereof without implementation of the plan or programme"* and *"the environmental characteristics of the areas likely to be significantly affected"* be included into the Environmental Report.

Furthermore, as stated within the government guidance on Sustainability Appraisals of Local Development Documents³ *"baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them"*.

- 4.2 Collection of baseline information forms an essential part of the SA process. It is vital to obtain sufficient baseline information on the current and likely future state of the area in order to enable the LDF's effects to be adequately predicted and evaluated. This chapter provides a summary of the current situation in the Medway Area in relation to the sustainability topics listed in 3.3.
- 4.3 For each indicator, quantified baseline data was collected which was applicable to the issues to be assessed by the SEA/SA and at a relevant geographical scale. The main sources used were official websites on the Internet, Medway Council reports and data, Kent County Council Reports and the Census. These formed a number of detailed papers titled 'State of Medway Reports', which are to be published at the beginning of the regulation 25 stage of the Core Strategy production.
- 4.4 From this baseline data a number of sustainability issues arose which are detailed at the end of each section. As stated within the government guidance on Sustainability Appraisals of Local Development Documents *"the identification of sustainability problems is an opportunity to define key issues for the DPD and develop sustainable plan alternatives and options..."*
- 4.5 It should be noted that many of the issues are cross-cutting and could have been placed under a number of headings. However, for ease of discussion, and to link in with the sustainability objectives, they have been placed under one section only. This is by no means a full list of all the issues but it attempts to acknowledge those, which are priorities for Medway.

4.6 Community (population, health, crime and deprivation)

Population

- 4.6.1 Medway has the largest population of a unitary authority in the South East at 249,488 in 2001 and at this point 88% of the population lived within the urban area and 12% in the rural area. The mid-year estimates from the Office of National Statistics (ONS) for 2007 estimate the population of Medway at 252,200, which reflects a very slow upward trend. It is expected that the population will be 268,800 by 2021 and 275,000 by 2026.
- 4.6.2 Medway is considered a 'young' borough compared to the UK due to the large number of younger people, with the 25-44 age range being the highest

³ Sustainability Appraisals of Regional Spatial Strategies and Local Development Documents (2005), ODPM

across all wards. The average age in Medway has been calculated by the ONS as 36.5, which is the 7th youngest in the region and below the national average. The largest numbers of older people live within the areas of Chatham and Rainham.

- 4.6.3 The ethnic breakdown within Medway is predominantly white Christian (96.4%), with only 2% Asian, 1.1% from a mixed race background and 0.7% considering themselves black, Chinese or other. In addition to the white Christian group, Sikhs and Muslims form the two other largest religions in the area. The % of the population from the ethnic minority groups has steadily increased and this has mainly been based within the Asian sub-group.

Health

- 4.6.4 Overall, health in Medway is worse than the average for the South East. Life expectancy is lower for both sexes, although the gap with the regional average has narrowed over the last 5 years, particularly for males.
- 4.6.5 Birth and fertility rates for Medway were above both the regional and national averages and the teenage pregnancy rate has remained stubbornly high. The mortality rate was also above the national average.
- 4.6.6 Healthy eating and physical activity rates in children and adults are worse than the national average. Medway has the sixth highest percentage of people who are obese and the third lowest percentage of people who consume 5 or more fruit or vegetables per day.
- 4.6.7 Over the last 10 years the number of deaths from all causes has lowered but still remained above the national average. There has been a reduction in deaths from stroke and heart disease but this has not been as dramatic as the national fall. The highest number of deaths comes from smoking, with 400 deaths per year related to this.
- 4.6.8 Therefore the main sustainability issue in respect to health is improving the overall life expectancy.

Sustainability Issue – Objective 8

Health in Medway is average, following trends for increasing life expectancy, though this is not as dramatic as nationally. The biggest killer in Medway is smoking, it has the sixth highest percentage of obesity and is the third lowest of those consuming 5 fruit and vegetables a day. There are also high levels of teenage pregnancy.

(Medway's Joint Strategic Needs Assessment; Medway's Children and Young People's Plan; Medway Sports Development Plan)

Deprivation

- 4.6.9 Medway is included within the 43% most deprived areas in the country. However this masks the fact that there are areas of extreme deprivation sited close by areas that are considered to be 'well-off'. In particular income deprivation affects 37,000 people and employment deprivation affects 13,000 people.

- 4.6.10 There are 5 Super Output Areas that are within the 10% most deprived areas in the country and the River ward falls within the 4% of the most deprived areas. 16% of the population live in the 20% most deprived areas, with 22% of children and 17% of older people living in low-income households.

Sustainability Issue – Objective 9 & 16

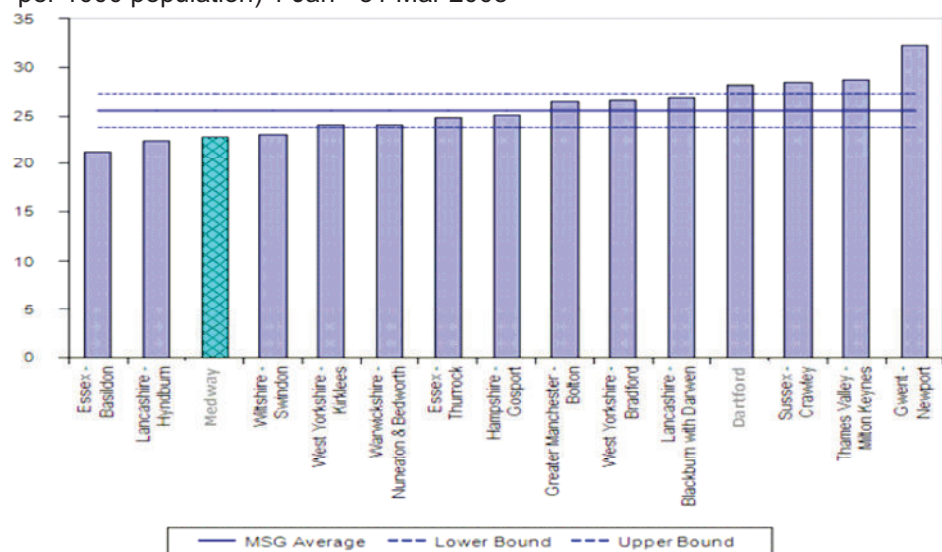
Though the area is not generally deprived, this masks areas of moderate and extreme deprivation. Deprivation occurs both in terms of income and employment. These have consequent impacts on other areas such as health.

(Medway Economic Development Statement; Medway Community Plan; SE Social Inclusion Plan; PPS1)

Crime

- 4.6.11 Medway has an average of 22.9 crimes per 1,000 people, which is below that for authorities with similar characteristics (e.g. population size) and is third lowest of similar authorities, as shown in the chart below.

Chart 1: Bar graph showing similar crime and disorder reduction partnerships (Crimes per 1000 population) 1 Jan - 31 Mar 2008



- 4.6.12 The Community Safety Plan has identified 4 key priorities in relation to crime. These are to reduce violence in the night-time economy, youth-related violence, incidents of serious violence and increasing feelings of safety within the Community.

Sustainability Issue – Objective 10

There are issues in relation to serious crimes and those related to youth-crime and the nighttime economy. These can be linked to a number of other areas within this and other sections.

(Medway Community Safety Plan; Medway Children and Young People's Plan)

4.7 Economy and Employment

- 4.7.1 Medway's working age population is 157,500 with 126,200 in employment.
- 4.7.2 A higher proportion of the population is of working age than the national average.
- 4.7.3 In general employment has risen by 25% over the past 10yrs along with an increase in the number of business units, although the area has a lower growth rate than the South East or nationally.
- 4.7.4 There have also been a number of changes in the characteristics of the workforce with a decrease in the number of male workers and an increase in the number of female workers.
- 4.7.5 The levels in employment when broken down into the broad classifications of industry give the following proportions:
- 1.9% in the primary sector;
 - 23.3% in the construction and manufacturing sector; and
 - 74.8% in the service sector.
- 4.7.6 Though the number within the service sector is high, with 30% of people working in public services, administration education and health, this is still lower than the national and regional averages. However, a characteristic of the Medway labour market is the high proportion of unskilled and lower skilled workers.
- 4.7.7 Average earnings within the Medway area are higher than the national average but lower than that of the South East.
- 4.7.8 Within the South East, Medway has the 6th highest level of unemployed and the 9th highest level of long-term unemployed. 21,000 people are claiming key benefits, which equates to 13% of the working age population. This is higher than the national and regional averages. 15% of those claiming unemployment benefits are under 20.
- 4.7.9 There are 92 schools within Medway, comprising of 69 primary schools, 19 secondary schools and 4 special needs schools reflecting the young age of the population.
- 4.7.10 The level of passes in GCSE English recently exceeded the national rate and continues an upward trend. Maths GCSE passes have also improved but are still below the national average. The number of children passing 5 GCSEs or more has improved and exceeded the target for 2007-08. In addition, the level of truancy fell below the national and regional levels in 2006/07.
- 4.7.11 Just 12% of the working age population in Medway has a degree or higher-level qualification, which is much lower than the national average of 19.8%. Just under 30% of the workforce have no qualifications or qualifications concentrated at NVQ2+ (equivalent of GCSEs), which is higher than the national average.
- 4.7.12 There are however a higher proportion of young adults in full-time education within Medway than in the rest of Kent, although there are still fewer places available locally to accommodate these.

- 4.7.13 Medway does however have a growing presence of Universities with an alliance between Christ Church University, Canterbury; the University of Greenwich and the University of Kent plus Mid-Kent College on the Pembroke site. These are growing their own academic specialisms including Pharmacology and Sport, as well as student societies and art groups. In addition the University College for the Creative Arts has recently been awarded a university charter.
- 4.7.14 These universities have the potential to add £10 million pounds to the economy with 600 jobs and also increasing the potential for adult learners and retraining to occur locally.

Sustainability Issue – objective 15, 16 & 9

Medway has suffered economically since closure of the Dockyard and although it has followed the national trend with the largest employment sector being in services and administration, this still remains below other areas in the region. Furthermore there are a large number of jobs within lower paid sectors. There is a large working age population but also high levels of out-commuting to London and moderately high unemployment.

There is a need for skills to be improved and to increase the level and value of jobs in the area.

(Medway Economic Development Statement; Regional Economic Strategy; PPS6; PPG4 & Draft PPS4)

4.8 Cultural Heritage and Material Assets

- 4.8.1 Due to its location along the River and its estuary, Medway has a rich maritime and military history that has resulted in an extensive number of material assets, many of which have important cultural and historical ties. The most prominent, well known and large scale of these is Rochester Castle and Rochester Cathedral, dating from Roman times and the Rochester Bridge that was built later. Associated with the castle are the main castle grounds that are important as a large area of open space for recreation and also for the staging of various cultural and music events throughout the year.
- 4.8.2 Also sited within Rochester, is the private King's School, which is an important part of the cultural heritage of the town, with connections to the neighbouring Cathedral. The school itself provides a mix of public and private open space to the inhabitants of the town, that connect with an important area of open space at The Vines Park and to St Margaret's Street that links to a path by the river and the eastern rising valley of the Medway.
- 4.8.3 In addition, there are other remaining castles at both Cooling and Upnor that were originally built as part of a network of forts for defence of the towns, as well as the large area and structures that make up the Historic Dockyard. These are crucially important to the cultural heritage and subsequent development of the towns. The buildings of the Dockyard are in the process of being reused and where necessary restored back to their former state, as a 'Living Museum', for use by members of the public.
- 4.8.4 There are also a number of other buildings that are linked to the naval presence within the towns or their historic development, such as The Brook,

which is the old town hall and associated gardens. Overall there are 954 Listed Structures, of which 55 are classed as Grade I, 154 Grade II* and 744 Grade II.

- 4.8.5 There are also 77 Scheduled Ancient Monuments (SAMs) within the area, including the fortifications at Fort Amherst, Chatham Lines and the field of fire at the Great Lines. There are also 26 Conservation Areas. In addition, the area covering the Great Lines and others connected with the development of the dockyard are being put forward for consideration as a UNESCO world heritage site, which it is hoped will allow for greater management of these assets.
- 4.8.6 As well as the most prominent physical features mentioned above, Medway is known for buildings and features that had connections to Charles Dickens or influenced his writing. These links are celebrated each year in a 4 day festival based around Rochester.
- 4.8.7 Other important material assets include 3 hospitals and 81 GP practices including health centres; 92 schools; 24 community halls; 8 sport and leisure centres; 3 theatres; 16 libraries and 5 council contact points sited in the town centres or in close proximity.

Sustainability Issues – Objectives 11 & 12

Medway has a rich maritime and military history that has provided a number of assets (listed buildings and larger parks and open spaces) of cultural significance.

There are also a wide range of assets for the community that in general are well-positioned, though there are some smaller rural areas which are not served as well.

There may be the potential for conservation of historic and culturally important buildings and sites to conflict with other objectives, such as housing or energy.

(PPS1; PPG15; PPG16; Heritage White Paper Consultation; SEA Directive)

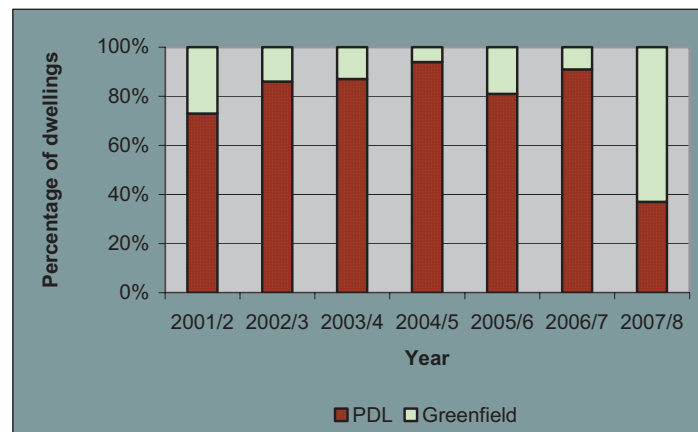
4.9 Housing

- 4.9.1 Medway along with the other North Kent authorities has a relatively self-contained local market, exhibiting limited connectivity to its surrounding districts. Nevertheless there is in-migration, particularly from Gravesham to the west and the highest levels of out-migration are to Swale, showing a clear movement from west to east. There are also movements from Maidstone and Tonbridge and Malling, although little reverse movement. This is likely to be down to the a higher level of affordable housing in Medway compared to areas to the south of the A2.
- 4.9.2 Medway's 2006 Housing Strategy Statistical Appendix states that at April 2006, there were an estimated 106,394 dwellings in Medway, of which 3161 were in Council ownership. Of the overall stock, 76% are owner-occupied and the greatest proportion (42%) are terraced properties, which is higher than either the regional or national averages.
- 4.9.3 A third of households privately rent and there are also a high number of households in caravans or temporary accommodation. The age of the building stock is younger in Rainham and the rural areas and the oldest is in the Gillingham area, which has an impact on housing conditions with older

buildings generally being connected to worst conditions. The overall household size is 2.48, which is larger than the national average.

- 4.9.4 Within the 2008 survey year, there were 45.7% of new and converted dwellings on previously developed land (gross). This is shown against previous years completions in the bar graph below. This was due to a higher number of Greenfield developments occurring and the commencement of larger regeneration schemes on previously developed land, not having started. This is expected to be a short term trend.

Chart 2: Bar graph showing proportion of completions on previously developed land



- 4.9.5 During the 2008 survey period, 230 affordable homes were completed. This equates to just over a quarter of gross completions (892) being affordable units.
- 4.9.6 The Annual Monitoring Report, 2007, found that while house prices in the Medway Towns have doubled since 1999, resident earnings have increased by less than 50%. The consequence has been that overall affordability as measured by the ratio of average resident earnings to house prices has fallen by 50%. Table 3 below shows the average house prices by type using 2008 prices. This trend is however less pronounced than in other parts of the region.

Table 3: Average house price by type, March 2008

	Medway	Kent	South East	Eng & Wales
Flats/Maisonettes	113,175	120,144	140,935	172,282
Terraced	135,317	159,171	177,983	144,589
Semi-detached	190,157	205,977	225,720	172,713
Detached	317,646	353,371	397,009	278,168

- 4.9.7 Access to the housing market is restricted by price. 42.6% of all new forming households can afford to pay no more than £300 pcm rent. Access rents are £353 pcm. The ability of concealed households to access the market is very limited. Only 29.8% of concealed households have incomes above £27,500; only 15.9% have incomes above £40,000. The cheapest 2 bed terraced property in the District require an income threshold of £28,000
- 4.9.8 The latest figures for empty properties in Medway, recorded in April 2007, for the Housing Strategy Statistical Appendix show that the percentage of empty

properties in the private sector in Medway is currently 1.6%. This percentage is lower than the national overall position of around 3.0%.

- 4.9.9 The conclusion of the Stock Condition Survey regarding empty homes was that it did not identify a serious problem with vacant dwellings in Medway but did recognise that it is an issue that the Council may wish to address, due to clusters in some areas.

Sustainability Issues – objective 6 & 7

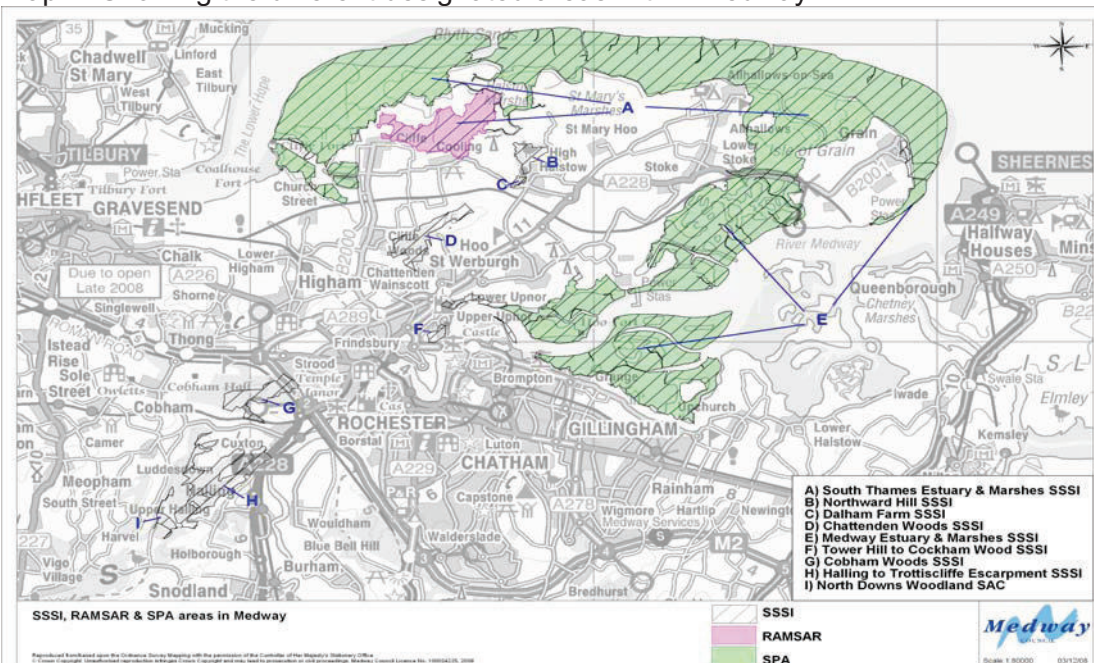
The majority of properties are owner-occupied and household sizes are above the national average. This and the gap between house price increases and wage increases means that more affordable housing provision will be required. Furthermore the Draft SE Plan requires 16,300 houses to be accommodated in the area during the Plan period. This should be accommodated as far as possible within existing or previously developed sites to minimise possible conflicts with other objectives, such as biodiversity.

(Medway Community Plan; Medway Housing Strategy; Regional Housing Plan; PPS1; PPS3; PPS7; Sustainable Communities; Urban and Rural White Papers)

4.10 Biodiversity and Open Space

- 4.10.1 The position of Medway on the North Kent Coast and the large open areas on the Peninsula, mean that it has a wide variety of habitats and a rich diversity of species. Many of these have been recognized nationally and internationally, mainly through being designated as Special Protection Areas (SPAs) under the Habitats Directive (79/409/EEC). In coincidence with this, through membership of the European Union, Britain is also a signatory of the RAMSAR Convention that is a voluntary agreement to protect areas that are particularly important for migrating wildfowl. Together these areas are collectively known as 'Natura 2000' sites and form part of an overall network across Europe of areas important for their conservation importance. Map 1 shows the different designations within the Medway area.

Map 1: Showing the different designated areas within Medway.



- 4.10.2 As shown on the map there are a number of areas where Special Protection Areas (SPAs) are overlaid by Sites of Special Scientific Interest (SSSIs) designations.
- 4.10.3 There is one Special Area of Conservation (SAC) near Upper Halling, which is a small part of the North Downs SAC that is important for its beech and yew forest, as it is one of the best in the country. In close proximity to this there are a number of semi-natural dry grasslands, other woodlands and scrubland.
- 4.10.4 There are also 8 SSSIs in the area. Table 4 below outlines the reasons for their designations and their current condition. DEFRA within it's Public Service Agreement has set a target for all SSSIs to achieve 95% by area to be in a favourable or recovering condition by 2010.

Table 4: Description and Condition of SSSIs

Name of SSSI	Description	Condition	Required Action
South Thames Estuary and Marshes	Wetlands of international importance comprising intertidal habitats, saltmarsh, coastal grazing marshes, and saline lagoons and lagoon type habitats, providing wintering and breeding habitats for important groups of wetland bird species, particularly wildfowl and waders as well as supporting migratory birds in passage. Each regularly support over 20,000 waterfowl birds respectively, including over 30 different species of national or international importance.	96% favourable or recovering. 3% unfavourable because of inappropriate weed control, effects of undergrazing, agricultural practices, inappropriate ditch management, scrubland control and coastal squeeze.	Agricultural operations before mid-June should be avoided. Careful management of existing ditches and drains should be introduced and maintained. This should include periodic removal of sediment and vegetation, and should be done on a rotational basis, including the creation of shelving margins rather than steep sides.
Medway Estuary and Marshes	Wetlands of international importance comprising intertidal habitats, saltmarsh, coastal grazing marshes, and saline lagoons and lagoon type habitats, providing wintering and breeding habitats for important groups of wetland bird species, particularly wildfowl and waders as well as supporting migratory birds in passage. Each regularly support over 20,000 waterfowl birds respectively, including over 30 different species of national or international importance.	Over 99% is in a favourable or recovering condition. Remaining small area is unfavourable due to inappropriate ditch management and cutting or moving and undergrazing.	Careful management of existing ditches and drains should be introduced and maintained. This should include periodic removal of sediment and vegetation, and should be done on a rotational basis, including the creation of shelving margins rather than steep sides.
Cobham Woods	Woodland and old parkland representative of woods in North Kent that occur in part on acidic Thanet Sands and in part on chalk soils. One nationally rare plant species occurs in the arable land close to the woods and an outstanding assemblage of plants is present. The site is also important for its breeding birds.	Only 67% favourable or recovering. Remaining 33% unfavourable/no change is due to lack of appropriate forestry and woodland management.	Felling, thinning or coppicing can help to create or maintain variation and at the same time non-native trees and shrubs be removed. This should be spread throughout the woodland and done at beginning of Aug or end Feb.
Northward Hill	This contains a heronry with over 200 pairs and is the largest in Britain. There is a diverse breeding bird community and the insect fauna is of interest, particularly moths and butterflies. The site consists of mixed	100% favourable or recovering.	

	deciduous woodland and scrub with some areas of open grassland and bracken. A number of small ponds are present and a few open ditches. Overall, the wood has a diverse flora with over 200 plants recorded, including the trees and shrubs. The site has been a National Nature Reserve since 1951 and is managed by the RSPB.		
Dalham Farm	One of the very few undisturbed areas which show mass movement on low-angled, inland slopes of London Clay. The effects of landslipping are visible as a series of ridges and small scarps crossing the slope. The site illustrates what is possibly the lowest angled slope failure in Great Britain and is important in demonstrating slope degradation in the absence of coastal erosion and removal of material from the base.	100% unfavourable or no change due to inappropriate scrub control.	
Chattenden Woods	Woodland is representative of coppice with standards woodland on the London Clay, which is a scarce habitat in Kent away from the Blean Woods. The site is also of importance for its breeding birds. Rough Shaw, which is an area of neutral grassland with scattered scrub forms a valuable addition to the woodland and contains several uncommon plant species which are not found in more improved grassland.	100% favourable or recovering.	
Towerhill to Cockham Wood	Contains woodland representative of that on Tertiary deposits in Kent and supports a rich insect fauna. About a third of all British species of bees and wasps are found here, including seven nationally rare species. In addition, Upnor Quarry exposes a complete tertiary stratigraphic sequence and is a vital site to be viewed in comparison with other Palaeogene localities in the eastern London Basin.	100% favourable or recovering.	
Halling to Trottscliffe Escarpment	Consists of an extensive area of the North Downs west of the Medway Gap. It is representative of chalk grassland in west Kent and beech woodlands on the chalk. Outstanding assemblages of plant and invertebrates are present. It is the only location in Britain for one type of moth and several other very scarce moths, beetles and grasshoppers also occur. The site supports a wide variety of birds, particularly woodland birds.	80% favourable or recovering. Rest unfavourable due to undergrazing, inappropriate scrub control, game management, inappropriate woodland and forestry management and some limited overgrazing.	The best way of managing scrub is through rotational cutting, as well as cutting in small patches.

4.10.5 In addition to these designated sites there are also a number of other important features in respect to biodiversity and open space in Medway. The first of these are Regionally Important Geological and Geomorphological Sites (RIGS). These are selected in accordance with the following criteria:

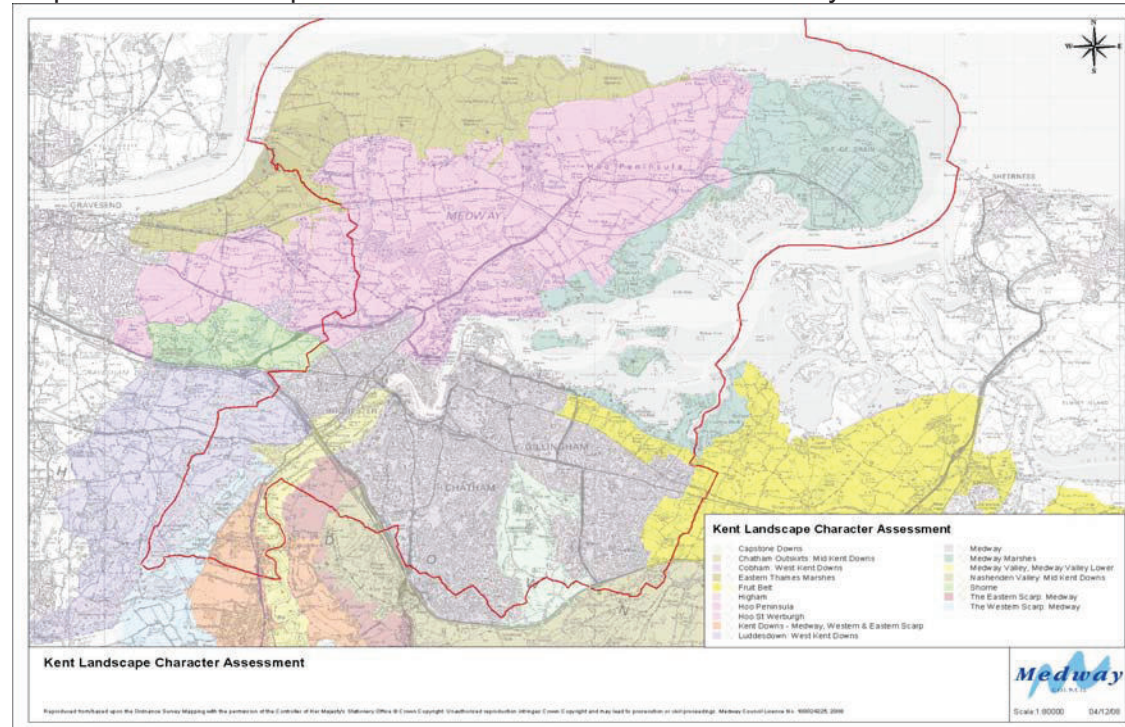
- The value of the site for educational purposes in life long learning.
- The value of a site for study by both amateur and professional earth scientists.
- The historical value of a site from an earth science perspective.
- The aesthetic value of a site from an earth science perspective.

Although these sites do not have the same official protection as those mentioned before, they are recognised in PPS9, which states that tests should be fulfilled to ensure that policies or development will not affect them.

- 4.10.6 There are also 8 Local Nature Reserves that help contribute towards conserving and increasing the levels of biodiversity in Medway. These, similarly to RIGS, should have an element of educational, teaching or learning associated with them. Alongside these there are also a number of voluntary organisations, such as the RSPB who own and run reserves, as well as two Country Parks.
- 4.10.7 In addition to the above, sites may be designated as Local Wildlife Sites outside the network of those statutorily protected. The purpose of these sites is to help secure the protection of nationally and locally threatened habitats and species, identify sites of substantive nature conservation value which should be protected from damaging development, provide a framework for the targeting of management work, advice, grant aid and other activities; and provide a clearer understanding of the nature and importance of Kent's wildlife habitats. These sites are generally recognised by local authorities and given protection through policies in local development plans.
- 4.10.8 As well as the designated habitats forming part of the Natura 2000 Network and local wildlife sites, there are a number of important landscape areas in Medway and the surrounding areas that are important for both wildlife and as an important resource for helping to improve human health.
- 4.10.9 The Kent Downs Area of Outstanding Natural Beauty lies mainly in the South West corner of the Medway area, although there is also a small area in the extreme southeastern corner, just below junction 4 of the M2. Additionally, Kent County Council commissioned a landscape character assessment⁴ in 2004 that identified nine character areas in Medway, some of which have been sub-divided, as shown in Map 2 below.

⁴ [http://extranet7.kent.gov.uk/klis/resources/landscape-assessment/Landscape Assessment of Kent October 2004.pdf](http://extranet7.kent.gov.uk/klis/resources/landscape-assessment/Landscape%20Assessment%20of%20Kent%20October%202004.pdf)

Map 2: Kent Landscape Character Assessments within Medway



4.10.10 Within this study are descriptions of the landscapes and a landscape strategy reflecting the condition and sensitivity of each. The key characteristics of these landscape areas are outlined within Table 5 below.

4.10.11 Finally, *two cluster studies have been produced by Greening the Gateway Kent & Medway in conjunction with Communities and Local Government covering the Hoo Peninsula and Capstone-Bredhurst. As well as this* there are a large number of protected open spaces that are spread throughout the urban areas.

Table 5: Condition and Key characteristics of Kent Landscape Characters within Medway

Site name	Condition and Key characteristics
<i>Eastern Thames Marshes</i>	The area forms part of the wider North Kent Marshes area of international importance for nature conservation which is designated as a Special Protection Area and RAMSAR site. Part of the area is also an Environmentally Sensitive Area. The area is considered to be in moderate condition. The ditches are of varying condition and there are many visual detractors ranging from small structures such as tipping, post and wire fences and bird hides, to urban and industrial developments.
<i>Medway Marshes</i>	This area is typically low lying and flat with huge open skies and extensive views. To the north of the river, the massive industrial complexes of Grain and Kingsnorth dominate the marshes. The southern marshes are much smaller and fragmented and have a much less coherent character. The majority of the marshland is reclaimed and protected from tidal inundation by coastal walls, although fragments of saltmarsh persist within the estuary and as islands. The traditional land cover is coastal grazing marsh and low lying pasture with a characteristic patterning of creeks and dykes still remaining to the west of the Isle of Grain.

<i>Hoo Peninsula</i>	The condition of the area is considered to be poor. The industrial complexes cause fragmentation and there are many visual detractors, including industrial lighting and residential development. The potential for semi-natural habitats is reduced in areas of arable cultivation and the ecological integrity is therefore thought to be moderate. The most important features of nature conservation importance are the areas of broadleaved woodlands, which include four SSSIs at Chattenden, Northward Hill, Beacon Hill and Tower Hill.
	Overall the condition of the area is considered to be poor. There is very little consistent landscape pattern, and visual detractors occur on both a large and detailed scale. Isolated patches of woodland provide clusters of semi-natural habitat but there is very little opportunity for ecological interest within the open arable fields.
<i>Fruit Belt</i>	Woodlands are the main ecological resource. Yaugher Woods and Fox Burrow Woods are listed in the Ancient Woodlands Inventory. Other elements of potential ecological and wildlife value are the shelterbelts that provide a more consistent framework of wildlife corridors than the patchy hedgerow cover.
	Overall, the condition of the area is very poor. There is an incoherent landscape pattern which has many detracting suburban and industrial influences and transport corridors. There are isolated shelterbelts and remnants of old orchards. Woodland cover is limited and the ecological integrity of the area is considered to be weak.
<i>Mid Kent Downs – A: Outskirts of Chatham</i>	Overall the condition of the area is poor. There are many detracting features, which are associated with unsympathetic land uses. The areas of intense arable farming reduce the ecological interest of the area. There is a strong influence from the urban area, built form has a negative impact on views and the condition of heritage features is poor.
<i>Mid Kent Downs – B: Nashenden Valley</i>	This area lies within the wider character area of the Mid Kent Downs. the lack of hedges or shaws to provide screening, makes it vulnerable to the visual impact of development.
<i>Capstone Valley</i>	The overall condition is considered to be good, although wooded edges to arable areas are felt to be vulnerable. The majority of the existing woodland is listed in the Ancient Woodlands Inventory and has considerable ecological value. Darland Banks is a local nature reserve and a local wildlife site (LWS). South Wood is a candidate for LNR designation and is also a LWS, as are Ambley, Hook and Holt Woods. The remnant chalk grasslands are also of ecological value.
<i>West Kent Downs</i>	The condition of the landscape is considered to be very poor due to visual detractors such as urban and industrial development and busy traffic routes. Only fragments of hedged field boundaries are occasionally visible in the areas of intense arable cultivation and semi-natural habitats are limited to woodland areas, often close to the urban edges. The ecological integrity is therefore considered to be weak. Large areas of mixed woodland dominate the skyline and form thick walls around fields, giving them a strong definition. Extensive hedgerow removal, for arable cultivation, has increased the importance of these woodlands, giving structure to the landscape.
<i>Kent Downs Medway</i>	The condition of the area is considered to be good. There are very few visual detractors, and the woodlands provide a strong and extensive ecological base. The eastern scarp is considered to be in very poor condition. Field boundaries have declined, there are many visual detractors and longer views are interrupted by industrial development in the lower valley. The ecological interest is very weak and built development has a negative impact. The western scarp, which is more extensive within the Medway administrative area, is considered to be of moderate condition although visual detractors include tipping, quarries and views of the motorway and industry beyond. Intensive arable cultivation and the few and variable field boundaries limit the ecological integrity of the area.

<i>Medway Valley</i>	On the lower slopes, the condition is considered to be very poor due to visual detractors, a weak network of semi-natural habitats, intensive arable coverage, fragmented hedgerows and limited tree cover. Characteristic historic settlements on the river are mostly overwhelmed by 19th and 20th century development. Within Medway the river forms part of a Site of Nature Conservation Interest, which extends into the Wouldham Marshes, which lie within Tonbridge and Malling. At the river's margins areas of reeds, other common emergents, mudflats and wading birds at low tide, contrast strongly with the more industrialised areas to the south. The overall condition of the area is considered to be poor due to fragmentation of the landscape and ecological interest by industrial works, floodplain management structures, new riverside residential developments and valley side quarries.

Sustainability Issue – Objective 1

Overall, Medway has a rich and diverse range of habitats and species, which are important to biodiversity and connections between habitats. The majority of SSSIs are favourable although some sites need better management. All sites and connections between them need to be conserved.

It is important for indirect pressures on biodiversity and habitats to be considered, such as fragmentation of habitats, impacts of recreational use and water usage and loss of non-designated wildlife and landscape areas.

(Medway Wildlife, Open Space and Countryside Plan 2008-16; Kent BAP; Kent Environment Strategy; Kent Landscape Character Assessment, Draft SE Plan; PPS1; PPS7; PPS9; PPG20; SEA Directive; Habitats Directive)

4.11 Air Quality

4.11.1 The Environment Act 1995 placed a statutory duty on Local Authorities to undertake periodic reviews and assessments of air quality within their boundaries. This should give consideration to the current and future air quality against health based objectives set out in the Government's Air Quality Strategy. Where objectives are not likely to be met by the relevant date Local Authorities must declare an Air Quality Management Area (AQMA) and develop an action plan.

4.11.2 Medway has declared six AQMAs, originally in 2002 and then updated in 2004. These are:

- Chatham Centre;
- Cuxton Road;
- Frindsbury Road;
- Maidstone Road (between Greenway and the Asda store traffic lights);
- Rochester Centre; and
- Strood Centre

These have been specifically identified in relation to missing the NO₂ objectives.

4.11.3 Within tables 6 & 7 below there are monitoring results for 2007 and the beginning half of 2008 for comparison.

Table 6: Monitoring results from NO2 diffusion tubes for 2007-08

Site Location	AQMA	2007	Jan to Aug 2008
	Air Quality Objective	40	40
High Street, Strood (Southern Heating)	Strood Centre	53	60
Star Hill No 18	Rochester Centre Star Hill	59	57
Corporation Street	Rochester Centre Corporation St	36	36
Cuxton road No 92	Cuxton Road, Strood	45	45
Railway Street	Chatham Centre	49	50
Highview Road No 2	Maidstone Road, Chatham	28	26
Frindsbury Road No 28	Frindsbury Road, Strood	45	45

Table 7: Additional monitoring NO2 diffusion tube results

Site Location	AQMA	2007	Jan to Aug 2008
	Air Quality Objective	40	40
High Street, Rainham K	Rainham Centre NEW	53	49
High Street, Strood (Tanning Shop)	Strood Centre (extension)	50	48
Luton Road (Funeral Directors)	Luton Road NEW	43	44
Luton High Street No 27	Luton Road NEW	40	37
Gibraltar Hill	Chatham Centre (extension)	45	42
Chatham High Street (Orbit Housing)	Chatham High Street NEW	47	49
Pier Road	Pier Road NEW	48	49

All monitoring results are bias corrected

As can be seen from these results some areas are a long way from the target and others are only just over the required levels. These results also reflect changes proposed for next year, such as the removal of the Maidstone Road AQMA and the extension of other areas such as Chatham Centre.

- 4.11.4 Revisions are expected early next year following a more detailed study for the inclusion of 4 new testing areas and some adjustments to existing areas. Although, the NO2 targets have been missed, those for sulphur dioxide, carbon monoxide and PM10 have not been exceeded.

Sustainability Issue – Objective 2

Although there is not a significant risk to human health, 6 AQMAs have been declared due to the impact of NO2 levels and 4 more are going to be included. NO2 is generally associated with transport, therefore journey times need to be reduced, through traffic needs to be moved away from the town centres and there needs to be greater incorporation of other forms of transport. However, improving accessibility of services is likely to create an increase in road traffic.

(Medway Air Quality Action Plan; LTP2; UK Air Quality Strategy; SEA Directive)

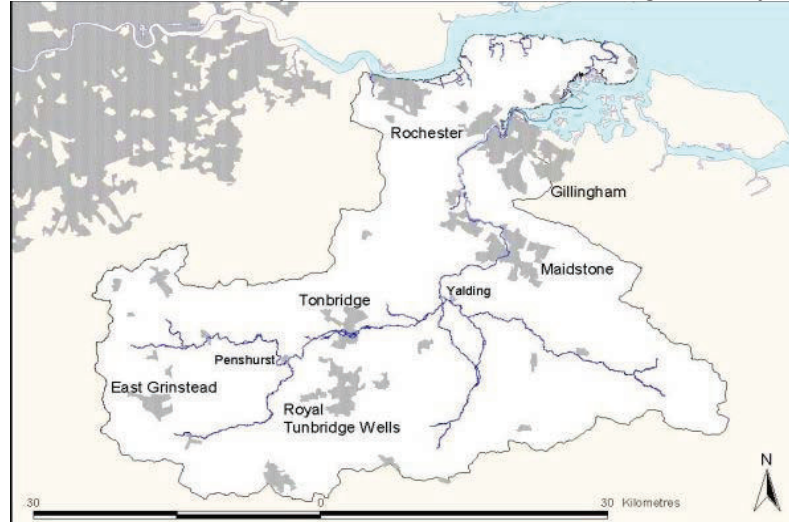
4.12 Water and Soil

- 4.12.1 There has always been a close link between the River, water quality and the towns in Medway. In general Medway has always had a supply of water, however during the recent drought periods of 2005/6, some water restrictions were applied and the water companies applied for drought orders, although due to improvements on the supply side these were not required.

- 4.12.2 Medway, along with the South East, is classed as an area where there is an over abstraction of water; meaning abstraction is causing unacceptable

damage to the environment at low flows. The map below shows the rivers contained within the Medway Catchment Abstraction Management System, which provides strategic direction as to the amount of water that should be taken across the catchment, outlining where greater or lesser abstraction would be possible to maintain existing stocks.

Map 3: Rivers within the Medway Catchment Abstraction Management System



4.12.3 Water quality within the South East has been improving since 1990, mainly due to better control of potentially polluting activities and also significant investment by the water companies in treatment. This rate of improvement has however slowed in recent years.

4.12.4 The Environment Agency classifies river quality into 5 groups ranging from A (very good) to F (bad). None of the streams within the Medway area are tested so no direct comparisons can be made on water quality. However, testing in the River Medway at the Allington Lock in 2007 gave the following results.

Table 8: Water quality recorded on River Medway at Allington Lock

River: R. Medway				
Chemistry: C	Biology: C	Nitrates: 4	Phosphates: 5	Year: 2007
Chemistry: C	Biology: C	Nitrates: 4	Phosphates: 5	Year: 2007
Chemistry: B	Biology: C	Nitrates: 4	Phosphates: 5	Year: 2007
Chemistry: B	Biology: C	Nitrates: 4	Phosphates: 5	Year: 2007
Chemistry: B	Biology: C	Nitrates: 4	Phosphates: 5	Year: 2007
Chemistry: C	Biology: A	Nitrates: 4	Phosphates: 6	Year: 2007
Chemistry: C	Biology: A	Nitrates: 3	Phosphates: 5	Year: 2007

4.12.5 As can be seen from these results the general water quality is good, although there is some room for improvement across both the chemical and biological results, as well as higher levels of both nitrates and phosphates present within the water content.

4.12.6 Groundwater quality needs to be protected from pollution and the Environment Agency set Groundwater Source Protection Zones, containing both Inner and Outer Zones. The impact on water quality needs to be

considered and addressed through both the SA process and production of the LDF. Diffuse and point source pollution are possible in Medway with a number of commercial businesses located along or in close proximity to the river.

- 4.12.7 The soil quality throughout the Medway area varies widely, with pollution on old industrial sites that are no longer in use and also areas of Grade I agricultural land. However, the Council are generally aware of those polluted sites and where there has been containment.
- 4.12.8 In addition, it is also recognised that water abstraction and water quality can affect designated sites, through potentially decreasing water levels and flows and affecting soil quality.

Sustainability Issue – objective 3 & 7

Medway is largely supplied from local groundwater or surface water from outside the area, therefore protection of groundwater is essential. In general water quality is reasonable although there is room for improvement of both biological and chemical indicators, as well as a need to reduce levels of pollutants. Furthermore water flows can be important for designated sites and soil quality. Water usage and efficiency need to be considered and incorporated, to ensure development is sited so as not to affect or strain supplies.

(Southern Water, Water Resource Management Plan; Draft SE Plan; PPS1; PPS9; SEA Directive; Habitats Directive, Water Framework Directive)

4.13 Waste

- 4.13.1 Medway has a variety of waste streams that need to be treated, from traditional household Municipal Solid Waste through to Hazardous and Agricultural waste. Organic, or putrescible wastes, are the largest fraction at some 40%, paper at 28% and plastics are some 10% of the total according to a Medway analysis carried out in 2000. At Civic Amenity sites, the volumes are significantly smaller at only 22% putrescibles, 6% paper, 2-3% plastics and combustibles of mixed origins being largest at 40%.
- 4.13.2 In 1999 MEL Research Ltd carried out an audit of Medway's waste streams and found that 117,300 tonnes of Municipal Solid Waste was being produced per year. At this point the majority was in kerbside collections, some through civic amenity sites, with the residual left over from recycling activity amounting to 23,000 tonnes.
- 4.13.3 The total municipal waste arisings, including all sectors of collection and treatment, in Medway for 2007/8 were 138,364 tonnes and 41,587 tonnes of this were recycled, equating to 30%. In England as a whole the aim is to achieve a combined recycling and composting rate of 33% of household waste by 2010 (Statutory Recycling and Composting Standards). Against this target it can be seen that Medway is doing well and this would be expected to increase with a recent planning approval for an in-vessel composting facility.
- 4.13.4 Hazardous waste due to its nature and economic market constraints mean it needs to be dealt with at a regional scale. In addition to this due to changes

in terms of classification of waste, the information in relation to trends is maturing. As yet it is still to be determined what role Medway might need in relation to hazardous waste.

Sustainability Issue – objective 5, 13 & 7

Medway currently meets the target for recycling, with 30% municipal waste being recycled and there have been recent approvals that should increase capacity. There are a number of other waste streams in the area and there is little data for these. However provision needs to be made for increasing all forms of treatment, recovery and reuse of waste materials.

(Medway Municipal Waste Strategy; Kent Waste Plan; Draft SE Plan; PPS10; UK Waste Strategy)

4.14 Transport and Accessibility

- 4.14.1 Medway is only 30 miles from London to the west and 40 miles from Dover to the east, with the five historic towns of Strood, Rochester, Chatham, Gillingham and Rainham forming the urban core. Larger villages in the more rural parts of Medway include Cuxton, Halling and the Isle of Grain. This combined with the young age demographic of the area and the higher number of older people living longer and more independently, mean there are a wide variety of needs to be catered for.
- 4.14.2 The area has excellent transport links to the national motorway and rail networks, as well as those throughout Kent. Access to the Channel Tunnel Rail Link is also in close proximity and faster services will be introduced serving Rochester from 2009 onwards.
- 4.14.3 The main issues for the road system around Medway are related to congestion and a resultant perception of inaccessibility. Though there are good links to the main road network, there are particular problems on the M25 around the A2 junction, junctions 3-5 of the M20 and its knock-on effects on the A228 and junction 5 of the M2. There is currently little distinction between the role of town centres and the crossroad functions of the main towns of Chatham and Strood.
- 4.14.4 It should not be forgotten that the River Medway is also an important transport link for the area. However, there is a need to ensure adequate landside capacity for onward movement of freight from deepwater ports and local berths. The exact amount of expansion and increase in transport here will depend on the impacts of other regional ports, such as Shell Haven and where proposals can be linked to tourism and urban renewal strategies. Environmental impacts on the river system also need to be considered.

Sustainability Issue – objective 14, 11 & 16

There are severe congestion issues in the town centres making them unwelcoming to both road users and pedestrians, as well as impacting on air quality. Transport routes need to be moved away from the town centres to help reduce congestion and help improve air quality. However transport will be necessary for improving economic performance and ensuring services are accessible.

(Medway Community Plan; LTP2; SE Plan; PPS1; PPG13; Sustainable Communities)

4.15 Climate adaptation and mitigation

4.15.1 Although there is uncertainty in climate change predictions, some climatic changes where there is greater agreement of predicted effects in the South East include:

- An increase in annual average daily temperature of 4.5 degrees;
- A 30-40% decrease in summer precipitation;
- A 15-20% increase in winter precipitation; and
- Sea level rise of 36cm.

4.15.2 This means that the South East is likely to experience, in the future, a warmer climate, with drier summers and wetter winters, which means that extreme events such as floods and droughts are likely to become less predictable and possibly more frequent. In addition, there is concern about sea-level changes leading to inundation of low-lying coastal areas.

Water Resources

4.15.3 The South East is the driest region in the country. The combination of low rainfall and growing demand has resulted in high demand for water resources. There are very few reservoirs and 76% of water comes from local groundwater sources and 24% from surface water sources outside the area.

4.15.4 In the South East metered and un-metered household per capita consumption of water increased on average by 9% between the early 1990s to 2003/04. But there are signs that average consumption is now decreasing. The average annual demand within Medway is 119.5MI/d, rising to a maximum of 151.8MI/d during dry periods. Taking the higher amount this is slightly above the national average of 148 litres per person per day in 2006. There is no underlying trend of increasing water usage, so it should be expected that this will remain about the same and then reduce over time as efficiency measures take effect.

4.15.5 Good quality data is available for the domestic use of water in Medway but only a very limited amount is available for non-domestic use. However, both industry and agriculture can demand large quantities of water and both can have an impact on the quality of the water supply due to the potential for pollution.

4.15.6 Commercial development (offices etc.) and leisure facilities (particularly swimming pools) can be substantial water users. There are various technologies available to improve water efficiency but significant benefits will only be achieved if these are retrofitted in existing developments on a large scale, in addition to efficiency measures in new buildings.

Flood Risk

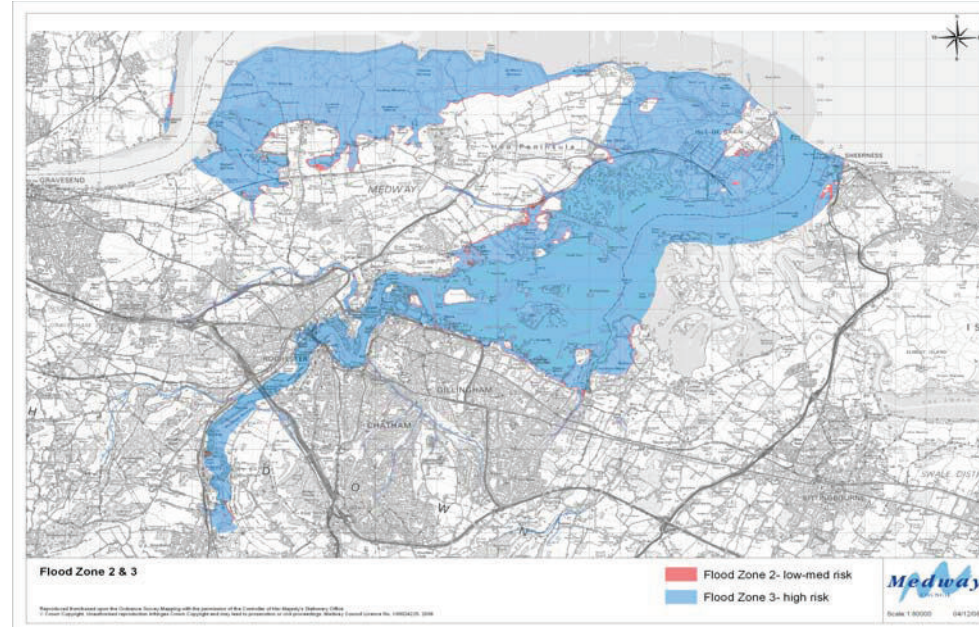
4.15.7 Flooding impacts can be both direct and indirect, with the worst effects often coming from surface water flooding flowing into inland streams higher up the catchment and flows into sewers, causing systems to be overwhelmed.

4.15.8 There have been a number of flooding incidents in Medway within the last century where water levels rose to a maximum of 4.6m AoD. The most recent event was in December 2005 when a tidal surge caused low level

flooding of Strood affecting Cuxton Marina, Janes Creek and Canal Road. The recorded level at Strood pier some 200m downstream of the A2 bridge was 4.22m AoD.

- 4.15.9 Within the Medway area there are 1551 properties at risk from the likelihood of fluvial flooding at some point during 1000 years and 1363 properties at risk of a flooding in a 100 year timescale. Buildings can be made more resilient through their design, positioning and the choice of materials used. A common practice in respect to the external areas is through soft landscaping or choosing a material for driveways that allows percolation. Map 4 below shows that there is a reasonable area of Medway within Flood Zone 3 and a smaller amount within Flood Zone 2.

Maps 4: Areas within Flood Zones 2 & 3



Sustainability Issue – objective 3 & 4

Water quality is not currently an issue, however this needs to be monitored both due to the requirements of the WFD and also to see whether it is affected by climate changes, such as increased incursion of saline water. Flood risk is a pertinent risk to particular areas and a considerable constraint to be considered for some developments. A sequential approach and all design aspects, including indirect impacts as well as mitigation with multiple benefits, should be considered for all proposals.

(Medway & Swale SFRA; Medway Shoreline Management Plan; Draft SE Plan; PPS25; PPS20; PPS1 Supplement; Climate Change Bill; Making Space for Water)

Energy

- 4.15.10 The release of greenhouse gases into the atmosphere through the combustion of fossil fuels from anthropogenic causes, results in an enhanced warming effect. There are a number of indicators related to energy consumption, efficiency and the levels of greenhouse gases being emitted.

- 4.15.11 Carbon Dioxide emissions for the Medway area have decreased slightly, falling from 1,231kt CO₂ in 2005 to 1,223kt CO₂ in 2006. However, due to rounding of the figures involved and a minimal increase in population, the per capita emissions have stayed the same at 4.9t CO₂.
- 4.15.12 Interestingly Medway's highest sector for emissions is from the domestic market, with the Industrial and Commercial sector contributing a large amount and the lowest emissions coming from the road transport sector. This reflects the larger proportion of older buildings within the housing stock.
- 4.15.13 Currently Medway creates a significant amount of energy for the National Grid through the Kingsnorth Power Station and some other smaller installations located nearby and at the Isle of Grain. It is expected that there will be a coal-fired carbon capture and storage (CCS) plant to be sited near to the existing E.ON station and Medway Council raised no objection to a combined cycle gas turbine (CCGT) power station to be sited not far from the existing gas power station. Both these technologies would fall within the definition of renewable resources, defined by the government⁵. Due to the area of land on the Peninsula there may be scope for a low carbon research and development hub to be created.
- 4.15.14 However, greater emphasis is being placed on how and where renewable technologies can be achieved both at the macro and micro scale. The 2006 and 2007 Annual Monitoring Reports, report that permission has been granted for the developments described above and also for six wind developments of varying scales; a couple of smaller scale CHP schemes; and four smaller scale photovoltaic schemes. The provision of a stand alone settlement to be sited at Chattenden allows for the potential of including sustainability principles and renewable technologies on a larger scale.
- 4.15.15 Medway's Stock Condition Survey in 2007 highlighted that the average SAP rating for Medway (56) was higher than the national average of 51.8 (taken from the English House Condition Survey update report 2004). The energy efficiency of a property is an important factor in both home energy conservation and fuel poverty.
- 4.15.16 12,343 of the properties in Medway have a SAP rating of less than 40 and the lower the rating the less energy efficient a property is. Energy inefficient properties are more expensive to heat adequately therefore household income is also an important factor to consider in determining what impact fuel poverty is having on the residents of Medway. The average fuel bill in Medway is £804 per annum and 8% of households have no central heating.

Sustainability Issue – objective 13, 5, & 2

There is a pertinent need for energy efficiency in the existing building stock to be increased as well as all new developments needing to include low carbon solutions. Medway is in a reasonable position in respect to energy generation from renewable or low carbon technologies, due to recently raising no objection to 2 new power stations including carbon capture processes. However, it must be recognised that renewable technologies can be intermittent and supplies must be ensured to ensure people come out of fuel poverty. Due to binding targets set by government and the acknowledged impacts on supply and climate of current generation, there is an ever growing need for renewable technologies.

(Sustainable Communities; PPS1 Supplement; PPS22; Energy Paper; UK Renewable Energy Strategy Consultation)

5. Framework, objectives and indicators

- 5.1 The Sustainability Appraisal Framework provides a way in which sustainability effects can be described, analysed and compared. The starting point for determining the objectives for the sustainability framework came from those within the Regional Sustainability Framework for the South East, adopted in June 2008. This was established to help ensure plans are in conformity with the higher level Regional Spatial Strategy (RSS).
- 5.2 To make the process more manageable the aim was to limit the number of objectives to no more than 18. These were identified by reviewing relevant policy documents at international, national, regional, county and local level and those put forward in the SEA Guidance and from the baseline information. The draft objectives have been refined through subsequent consultation with internal officers. The achievement of these objectives should be measurable using identified indicators.
- 5.3 The indicators were identified through a scoping of indicators already collected by officers in the Local Authority. As this scoping was very broad, the objectives were used to focus and refine the range of indicators. The following framework consists of draft indicators for comment and will need to be developed into a well-defined and cost effective monitoring programme in the next stage of the SEA.
- 5.4 The objectives and indicators are sometimes considered to cover more than one SEA topic. As such the list of objectives and indicators set out in Table 10, beginning on page 32, also shows these against the aims of the Sustainable Development Strategy.
- 5.5 The Medway Council objectives were tested for internal compatibility. This is a subjective exercise and the outcomes are shown in Table 9. These highlight where there may be the potential for conflicts with what they aim to achieve. For example, the objectives associated with providing housing and those aiming to conserve biodiversity and the natural and cultural environment may not be compatible. There is also potential conflict between ensuring high and stable economic growth and the issues associated with traffic, specifically air quality, health and climate change.
- 5.6 The objectives should not be removed because of this potential conflict but highlighting this at an early stage allows the framework to be aware of and therefore balance these issues. Simply because the objectives are compatible or incompatible, does not mean that the outcomes also have to be. This exercise has therefore identified the areas where the objectives need to be carefully balanced to ensure the outcomes are consistent and where possible achieve a win-win situation.

Table 9: SA Compatibility Matrix

Objective Number	15																Compatible
	14															Potentially incompatible	Potentially compatible
	13															Potentially compatible	Compatible
	12												Potentially incompatible	Potentially incompatible		Compatible	Potentially compatible
	11											Potentially incompatible		Incompatible		Compatible	Compatible
	10										Compatible	Compatible					Compatible
	9									Compatible		Potentially compatible				Compatible	Compatible
	8								Compatible			Potentially compatible	Incompatible			Compatible	Compatible
	7							Compatible	Compatible	Potentially compatible	Potentially compatible	Potentially compatible	Potentially compatible	Compatible	Compatible	Compatible	Compatible
	6						Compatible	Compatible	Compatible			Potentially incompatible					Compatible
	5					Potentially incompatible	Compatible		Potentially incompatible				Potentially compatible	Potentially compatible			Potentially compatible
	4					Potentially incompatible	Potentially incompatible	Compatible	Compatible		Potentially incompatible		Potentially incompatible			Potentially compatible	Potentially compatible
	3						Potentially incompatible	Compatible	Compatible		Potentially incompatible		Potentially incompatible			Potentially compatible	Potentially compatible
	2			Potentially compatible				Compatible					Potentially incompatible	Potentially incompatible		Potentially compatible	Potentially compatible
	1	Compatible	Compatible	Potentially incompatible	Potentially compatible	Incompatible	Incompatible	Compatible		Compatible	Potentially incompatible		Compatible			Potentially compatible	Potentially compatible
		2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Objective Number																	

Compatible	Compatible
Potentially compatible	Potentially compatible
Potentially incompatible	Potentially incompatible
Incompatible	Incompatible
No relationship	No relationship

Note: All potentials are subject to implementation and a cautious approach has been taken in terms of expected impacts.

Table 10: Sustainability framework – objectives and indicators

Sustainable Development Principle	Directive Topic	Number	Objective	Suggested Indicators
Protection of the Environment	Biodiversity, Flora and Fauna	1	Conserve and enhance the diversity and abundance of habitats and species	• Extent and condition of key habitats. • Condition of SSSI's • Reported levels of damage to designated sites. • Achievement of Biodiversity Action Plan targets. • Number/area of Local Nature Reserves • Population of wild birds <i>and farmland birds</i> • <i>Area of land covered by agri-environment schemes</i>
Protection of the Environment	Air	2	Reduce air pollution and improve air quality, including reduction of greenhouse gas emissions	• Achievement of Emission Limit Values. • Population living in Air Quality Management Area • Number of days of air pollution. • Emissions of greenhouse gases from energy consumption, transport and land and sea waste management.
Protection of the environment; and Prudent use of Natural Resources	Water and Soil	3	Maintain and improve quality of ground and surface waters and security of supply	• Quality (biology and chemistry) of rivers, canals and freshwater bodies. • Quality and quantity of groundwater. • Rivers of good or fair chemical and biological water quality. • Compliance with EC Bathing Waters Directive. • Water use (by sector, including leakage) and availability. • Per capita consumption of water. • Incidents of major and significant water pollution

Sustainable Development Principle	Directive Topic	Number	Objective	Suggested Indicators
				Water availability of water-dependent habitats, especially designated wetlands
Protection of the environment; and Social Progress	Climatic Factors	4	Reduce risk of flooding and ensure flood resilience of buildings and minimise the effect on public services and infrastructure	- Flood risk. - Properties at risk from flooding - Number of additional houses where flood risk has been reduced - New development with sustainable drainage installed
Protection of the environment; Prudent use of Natural Resources and Social Progress	Climatic Factors	5	Reduce ecological footprint through prudent use of natural resources, reduction in waste management and sustainable waste management practices	- Waste disposal in landfill. - Percentage of the total tonnage of all types of waste that has been recycled; composted; used to recover heat, power and other energy solutions; and landfilled - Number of new buildings reaching Code for Sustainable Homes Level 4 or above by 2013.
Prudent use of natural resources; and Social Progress		6	Provide opportunity for everyone to live in a decent, sustainably constructed, affordable home suitable to their needs	- Percentage of new and retrofit homes reaching Sustainable Homes Level 4 or above - Housing completions compared with regional guidance. - Affordable homes within the total housing stock. - Homelessness. - Number of unfit homes per 1,000 dwellings.
Prudent use of natural resources		7	Maximise land use efficiency through appropriate use of previously developed land and existing buildings	- Housing density - Percentage of development on previously developed land

Sustainable Development Principle	Directive Topic	Number	Objective	Suggested Indicators
Social progress	Human Health	8	Improve the health and well-being of the population and reduce health inequalities	• Years of healthy life expectancy • Mortality by cause • Death rates from circulatory disease, cancer, and accidents, and suicide. • Infant mortality rates. • Conceptions among girls under 18. • Life expectancy. • Obesity
Social Progress	Population	9	Reduce inequalities in poverty and social exclusion	• Proportion of children under 16 who live in low income households. • Percentage of population of working age who are claiming key benefits. • Number of households in fuel poverty • Proportion of population who live in wards that rank within the most deprived 10% and/or 25% of wards in the country. • Access to services for disabled people
Social Progress	Population	10	Reduce crime and the perception of crime	• Recorded crimes per 1,000 population • Fear of crime surveys • Number of transport accidents • Level of domestic burglaries, violent offences and vehicle crimes per 1,000 population

Sustainable Development Principle	Directive Topic	Number	Objective	Suggested Indicators
Social Progress	Material Assets	11	Improve accessibility to key services and facilities (inc. countryside, leisure/recreation and historic environment)	- Percentage of development within 10 minutes or 500m walk of a frequent bus route/rail service. - Access to services for disabled people - Distance to nearest leisure or cultural facility - Percentage of land designated for particularly quality or amenity value, including publicly accessible land and greenways. - Proportion of population within 200m of parks and open space <i>The proportion of Medway residents meeting the Accessible Greenspace Standards:</i> - live no further than 300m away from nearest area of natural green space of 2ha in size - at least one accessible 20ha site within 2km of home - one accessible 100ha site within 5km of home - one accessible 500ha site within 10km of home - Participation in sports, outdoor and volunteer activities
Protection of the environment	Cultural Heritage & Landscape	12	Conserve and enhance historic buildings, archaeological sites and culturally important features and increase engagement by all sections of community	- Percentage of Listed Buildings and archaeological sites 'at risk.' - Buildings of Grade I and Grade II* at risk of decay. - Additional listed building or conservation area designations per annum

Sustainable Development Principle	Directive Topic	Number	Objective	Suggested Indicators
				Participation in Cultural activities
Prudent use of Natural Resources; and Protection of the Environment	Material Assets & Climatic	13	Increase energy efficiency; the proportion of energy generated from renewable sources and the diversity and security of energy supplies	- Electricity generated from renewable energy sources and CHP located in the area. - Energy consumption per building and per occupant. - CO² emissions. - Number of households in fuel poverty
Protection of the environment; and Social Progress		14	Reduce traffic and congestion by reducing need to travel and improving travel choice	- Distances travelled per person per year by mode of transport. - Traffic volumes. - Growth in road traffic. - Average vehicle speeds. - Proportion of travel by car. - Investment in public transport, walking and cycling
Economic growth and employment		15	Raise educational achievements through developing opportunities to acquire skills, to develop and maintain workforce	- Proportion of 19 year olds with Level 2 qualifications (% GCSEs A*-C or NVQ equivalent) - Percentage of population of working age qualified to NVQ Level 3 or equivalent. - Proportion of adults with above or below average literacy and numeracy skills.

Sustainable Development Principle	Directive Topic	Number	Objective	Suggested Indicators
Economic growth and employment		16	Support and improve employment and economic competitiveness in town centres and deprived areas	• Business start-ups net of closures. • Inward investment. • Social and community enterprises. • GVA per capita • Labour productivity performance of the South East against other high performing regions in Europe and the world.

6. Next Steps/Consultation

- 6.1 This is considered to be stage A5 following the government guidance⁶, which involves the consultation on the scope of the SA. This first statutory consultation period *ran* for 5 weeks until the 23rd JANUARY 2009.
- 6.2 This report *was* been sent to the 3 statutory stakeholders (the Environment Agency, English Heritage and Natural England), as well as being published on the Council's website and sent separately to the following stakeholders:
- Neighbouring Authorities – Kent County Council, Gravesham, Swale, Maidstone and Tonbridge and Malling Borough Councils
 - Regional Assembly – SEERA
 - Government Office for the South East (GOSE)
- 6.3 In addition, to the above consultations there *was* also a presentation to the Local Strategic Partnership in December 2008.
- 6.4 At this Scoping Stage the broad options for the Core Strategy *were* not yet available, so these will be produced in tandem with the Initial Sustainability Report (Stage B of the SA process). Therefore at Stage B the SA framework will help identify appropriate options by assessing then highlighting the sustainability implications of each and suggesting recommendations for improvement.
- 6.5 The relative merits of the objectives, policies and proposals put forward will be considered against the SEA/SA objectives and associated baseline information at each appropriate stage, where there are significant changes.
- 6.6 In accordance with the Directive, in assessing the alternatives, the likely significant effects on the environment should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects.
- 6.7 It is the Council's intention that following this report, an Initial Sustainability Appraisal will be published alongside an Issues and Options paper in April 2009 and then subsequent documents at each appropriate stage, most likely to be called an Interim Sustainability Appraisal and Final Sustainability Appraisal.
- 6.8 If you wish to discuss this report call 01634 334321 or make representation please use the details below. All responses should make reference to the section/paragraph number to which the representation is being made.

Development Plans & Research
Medway Council
Gun Wharf
Dock Road
Chatham, Kent
ME4 4TR
localdevelopmentframework@medway.gov.uk.

⁶ A practical guide to the Strategic Environmental Assessment Directive (2005), ODPM

Appendix 1: List of the relevant plans and programmes,
expanded to show their main aims and relationship to the SA
framework

Plan	Key aims and objectives	Implications for SA
International		
European directives, including the Birds, Habitats and the RAMSAR Convention	The Birds Directive requires Member States to take measures to preserve a sufficient diversity of habitats for all species of wild birds and that special measures are taken to conserve the habitat of certain particularly rare species and of migratory birds. The Habitats Directive requires Member States to take measures to maintain or restore natural habitats and wild species at a favourable conservation status. RAMSAR requires the conservation of wetlands.	SA should aim to protect and enhance the diversity and abundance of species and to monitor the condition and any loss or gain of habitats.
EU Water Framework Directive	The WFD requires member states to protect aquatic ecology, unique and valuable habitats, quality of drinking water and bathing waters	SA should aim to protect aquatic ecology and habitats, drinking water quality and if applicable, bathing water quality, then monitor there is no deterioration
EEC Waste Framework Directive	This laid out the principle of moving from the traditional disposal to landfill towards increased resource use and recovery.	The SA objectives should refer to waste minimisation and management and several promote this e.g. to minimise pollution levels and to maximise land use efficiency. This should be monitored to ensure that the levels of waste going to landfill are reduced and there is an increase in reuse and recovery.
EC Landfill Directive	This sets out the following targets for amounts of waste to be diverted from landfill: • 40% by 2010 • 45% by 2015 and • 50% by 2020.	The SA objectives should refer to waste minimisation and practice.

Plan	Key aims and objectives	Implications for SA
National		
Securing the Future: delivering the UK Sustainable Development Strategy	This sets out 4 principles of sustainable development to be used as a basis for integrating sustainable development into plans and strategies. These are: • Social Progress which recognised the needs of everyone; • Effective protection of the environment; • Prudent use of natural resources; and • Maintenance of high and stable levels of economic growth and employment	Policies aimed at sustainable development should meet all of the SA objectives.
Sustainable Communities: Building for the Future	• To ensure all social tenants have a decent home by 2010. • To improve conditions for vulnerable people in private accommodation. • To ensure all tenants get an excellent service form their landlord. • To ensure all communities have a clean, safe and attractive environment. • To bring back into use, homes which have been abandoned. • To recreate sustainable communities and ensure high quality design. • To tackle the housing shortage. • To create a better balance in the housing market. • To promote development, whilst protecting and enhancing the countryside. • To ensure economic competitiveness.	A key objective for the SA must be to provide the opportunity for people to meet their housing needs. The SA should aim to maintain and enhance the character of the townscape and landscape.

Plan	Key aims and objectives	Implications for SA
Draft Climate Change Bill	Commits the UK to cutting CO2 emissions by 60% from 1990 levels by 2050, with significant change to be achieved by 2010. This is accompanied by the Climate Change Programme setting out a timetable as to how to achieve this. This 60% target is likely to be revised up to 'at least 80%' to include commercial shipping and aviation, which are currently excluded.	An SA objective should be included that considers the effects of climate change and the environment is a key theme of the SA.
UK Renewable Energy Strategy (Consultation)	This lays out a suggested framework of how and where renewable energy technologies could help to provide energy in the future. This sets an overall target of 15% of total energy demand to come from renewable sources by 2020, with a suggested breakdown of 10% being in the transport sector; 14% in the heat sector and 32% in terms of electricity generation. • People shaping the future of their community. • People living in attractive, well-kept towns and cities. • Good design and planning which makes it practical to live in more environmentally sustainable way. • Towns and cities able to create and share prosperity. • Good quality services.	An SA objective is required in relation to renewable energy and renewable energy covers all SA themes.
Urban White Paper: our Towns & Cities: The Future	• People shaping the future of their community. • People living in attractive, well-kept towns and cities. • Good design and planning which makes it practical to live in more environmentally sustainable way. • Towns and cities able to create and share prosperity. • Good quality services.	Policies aimed at sustainable development should meet all of the SA objectives.

Plan	Key aims and objectives	Implications for SA
Rural White Paper: Our Countryside: the Future	- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas. - To maintain and stimulate communities, and secure access to services which is equitable in all circumstances, for those who live or work in the countryside. - To conserve and enhance rural landscapes and the diversity and abundance of wildlife. - To increase opportunities for people to get enjoyment from the countryside. - To promote government responsiveness to rural communities through better working together between departments.	Policies aimed at sustainable development should meet all of the SA objectives.
Bringing Britain Together: A national strategy for neighbourhood renewal	This strategy is to be built on the concepts of: - - investing in people, not just buildings; - involving communities, not parachuting in solutions; - developing integrated approaches with clear leadership; - ensuring mainstream policies really work for the poorest neighbourhoods; - making a long-term commitment with sustained political priority.	Policies aimed at sustainable development should meet all of the SA objectives.
A New Commitment to Neighbourhood Renewal — national strategy action plan	The vision is reflected in two long-term goals: - In all the poorest neighbourhoods, to have common goals of lower worklessness and crime, and better health, skills, housing and physical environment; - To narrow the gap on these measures between the most deprived neighbourhoods and the rest of the country.	Accessibility and equality are key themes of the SA and policies aimed at sustainable development should meet all SA objectives.

Plan	Key aims and objectives	Implications for SA
Heritage White Paper: Heritage Protection for the 21st Century (Consultation)	Sets out intentions to include Scheduled Ancient Monuments (SAMs) and their management and protection within the planning system, as well as Conservation Areas and World Heritage Sites.	SA should have an objective in relation to the historic environment and accessibility is a key theme of the SA.
UK Waste Strategy	Promotes best practicable environmental option (BPEO), the waste hierarchy and the proximity principle. Sets the following targets for amounts of the waste stream to be composted and recycled: • 40% by 2010 • 45% by 2015 and • 50% by 2020 and for the following proportions to be recovered from the remaining waste stream: • 53% by 2010 • 67% by 2015 • 75% by 2020	The SA objectives should refer to waste minimisation and practice.
Future Water	Sets out a vision for how the water sector should look by 2030. Rivers, canals, lakes and seas are improved for people and wildlife and where excellent quality drinking water is provided. A sector where water resources are valued and protected, water is delivered to customers through fair, affordable and cost-reflective charges, flood risk is addressed with greater understanding and good surface water management and the water industry has cut its greenhouse gas emissions.	The SA should include objectives covering water resources and both water resources and impacts from climate change are key themes in the SA

Plan	Key aims and objectives	Implications for SA
PPS1: Creating Sustainable Communities	Promote sustainable patterns of urban and rural development by: • Making suitable land available for development to improve the quality of life. • Contributing to sustainable economic growth. • Protecting and enhancing the natural and historic environment and the quality and character of the countryside, and existing communities. • Ensuring high quality development through good design. • Ensuring development supports existing communities.	Policies aimed at sustainable development should meet all of the SA objectives.
Planning and Climate Change – Supplement to PPS1	Sets out how planning should minimise impacts on climate change through increased resource and energy efficiency, sustainable transportation and maximises resilience to the effects of climate change. This document is currently in draft form. Key objective is trying to ensure all new house building moves towards the highest level of sustainability.	Policies aimed at sustainable development should meet all of the SA objectives.
PPG2: Green Belts	Aim to prevent urban sprawl by keeping land permanently open. To assist in safeguarding the countryside from encroachment and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	SA objectives need to incorporate natural environment and landscape protection and protection of the environment is a key aim of sustainability.

Plan	Key aims and objectives	Implications for SA
PPS3: Housing	Local planning authorities should • Meet the housing needs of the whole community; • Provide a wider choice of housing and seek to create mixed communities; • Prioritise previously-developed land for development, bringing empty homes back into use and convert existing buildings, over development of greenfield sites; • Sustainable patterns of development; • Efficient use of land; • Reduce car dependence; • Promote good design. • Where appropriate, include a policy seeking affordable housing in suitable locations.	The requirement to meet the housing needs of the entire community should be reflected in an SA objective, as housing will be a key focus of the SA.
PPG4: Industrial & Commercial Development & small firms	Encourage continued economic development in a way that is compatible with its stated environmental objectives.	SA/SEA objectives should include measures to encourage economic competitiveness, to promote the vitality of urban centres, to reduce health inequalities and reduce the need to travel by private car.
Draft PPS4	Anticipated that a greater use of market, economic, environmental and social information will be required to support planning applications.	SA/SEA objectives should include measures to encourage economic competitiveness, to promote the vitality of urban centres, to reduce health inequalities and reduce the need to travel by private car.
PPS6: Planning for Town Centres	Promote vital and viable city, town and other centres.	SA should take account of the sequential approach.

Plan	Key aims and objectives	Implications for SA
PPS7: Sustainable Development in Rural Areas	- To raise the quality of life and the environment in rural areas. - To promote more sustainable patterns of development. - Promoting the development of the English regions by improving their economic performance so that all are able to reach their full potential. - To promote sustainable, diverse and adaptable agricultural centres.	SA objectives should reflect the need to protect and enhance rural areas.
PPG8: Telecommunications	To facilitate growth of new and exciting telecommunications systems whilst keeping the environmental impact to a minimum and protecting public health.	Encouraging telecommunication can be met through the SA objective to improve accessibility to services. However conflict may arise from SA objectives relating to health and conserving biodiversity and protecting the quality of the landscape unless clear restrictions are included.
PPS9: Biodiversity and Geological Conservation	Promote sustainable development by - Conserving and enhancing biodiversity as an integral part of economic, social and environmental development; - Improving the quality and extent of natural habitats and geological sites; - Contributing to urban renaissance by enhancing biodiversity in green spaces and on urban development sites; and - Contributing to rural renewal by taking account of biodiversity in supporting economic development and contributing to a high quality environment.	SA includes an objective to conserve and enhance biodiversity and habitats in Medway. This is a key theme for the SA/SEA.

Plan	Key aims and objectives	Implications for SA
PPS10: Planning for Sustainable Waste Management	• Delivering of sustainable development through driving waste up the hierarchy with final disposal as the last option. • Enable a timely provision of waste management facilities to meet the needs of the community. • Help implement the national waste strategy to be consistent with the European legislation namely the Landfill Directive. • Respect the proximity principle for waste management without endangering human health or the wider environment. • Reflect the concerns and interests of local communities and the needs of waste collection, waste disposal authorities and business and encourage competitiveness. • While there is a need to protect green belt designation land there will need to be recognition of the particular locational needs of certain types of waste management systems. • Layout and design of new development supports sustainable waste management	Several SA objectives promote this e.g. to minimise pollution levels and to maximise land use efficiency.
PPG13: Transport	• Promote more sustainable transport choices. • Promote accessibility. • Reduce the need to travel, especially by car. Provides an opportunity for managing social inclusion by ensuring services and accessible by public transport.	Reducing the need to travel by private car will promote social inclusion and help achieve sustainability objectives.
PPG15: Planning & the Historic Environment	Effective protection for all aspects of the historic environment. To reconcile the need for economic growth with the need to protect the natural and historic environment and ensure the conservation of the natural beauty and amenity of the land.	An SA/SEA objective should aim to protect or enhance the historic environment.

Plan	Key aims and objectives	Implications for SA
PPG16: Archaeology & Planning	The protection, enhancement and preservation of sites or archaeological interest and of their settings.	The SA/SEA objectives should aim to protect or enhance the historic environment.
PPG17: Planning for Open Space, sport & recreation	• Support urban renaissance; • Support rural renewal; • Promotion of social inclusion and community cohesion; • Promote health and well-being; • Promote sustainable development.	SA objectives could include conserve and enhance biodiversity, to improve health and well being, to improve accessibility to services and to maintain or enhance the character of the landscape.
PPG20: Coastal Planning	Protect, conserve and, where appropriate, improve the landscape, environmental quality, wildlife habitats and recreational opportunities of the coast.	Objectives relating to flooding and biodiversity will be applicable.
PPS22: Renewable Energy	Increase development of renewable energy and contribute to sustainable development.	SA objectives should reflect the need for energy efficiency.
PPS23: Planning and Pollution Control	Guidance on determining the location of development that may result in pollution, and ensure that other developments are not affected by major or existing sources of pollution.	SA objectives should reflect the need to minimise pollution, and maintain and enhance air and water quality.
PPS25: Development & Flood Risk.	Ensure that new development is safe and not exposed unnecessarily to flooding. Where possible reduce and certainly not increase flood risk and ensure that flood plains are used for their natural purposes, continue to function effectively and are protected from inappropriate development.	SA objectives may include reference to reducing the flooding risk.

Plan	Key aims and objectives	Implications for SA
Regional		
Creating Sustainable Communities: Greening the Gateway	Key principles: • Planning in advance • Developing an environmental evidence base • Encouraging inclusiveness and integration • Protecting local character and distinctiveness • Protecting designated sites • Habitat restoration and creation • A dynamic landscape • Community involvement	The synergies between the two strategies should be incorporated in the SA objectives.
South East Regional Spatial Strategy (draft)	This sets out the Regional Policy framework in relation to the economy, tourism, housing, transport, communications and natural resources.	The level of housing, economic growth and resource use, such as water will be key issue for the SA.
Regional Transport Plan	• Facilitate urban renaissance and foster social inclusion. • Reduce the wider environment, health and community impact associated with the transport system. • To improve strategic road and rail links. • To take forward transport infrastructure proposals required to support development in the growth areas. • To develop road and rail links that improve inter and intra-regional connectivity. • To improve and develop more sustainable transport connections to the region's key ports, airports and international rail stations.	SA objectives could include reference to reducing need to travel, sustainable transport and improved accessibility. Could also help to tackle air quality

Plan	Key aims and objectives	Implications for SA
Regional Housing Strategy 2008-2011	This sets out the framework for how housing will be provided and funded across the South East until 2011. Development, except in extreme cases, should include 35% affordable properties to rent or part rent/part buy. There should be greater choice, more sustainable patterns of development and more efficient use of land, focusing on existing towns and cities, ensuring that all housing is well-designed to improved quality of life and promoting urban revival and prosperity. Ensure affordable homes come in a range of sizes to suit families, couples and singles and meet high levels of energy efficiency and building standards in new and existing stock	The objective that there should be a mix of housing with good efficiencies and design, which meet the need of communities and are affordable should be reflected in the SA.
Regional Economic Strategy 2006-2016	Set out the framework for achieving sustainable economic growth across the South East until 2016. This emphasises principles of smart growth and increasing enterprise, innovation and skills to achieve higher productivity and bring more of the resident population into economic activity.	Economic objectives form a core of the SA framework and the importance of combating economic issues should be a key theme.
South East Region Social Inclusion Statement	A region in which we achieve social progress which recognises the need of everyone with string communities free from high levels of crime and discrimination; with ready access to jobs, education, homes, services and amenities; diverse opportunities for everyone to live fulfilled and health lives and to realise their full potential.	Social objectives form a core of the SA and the importance of combating social exclusion should be a key theme.

Plan	Key aims and objectives	Implications for SA
"The Cultural Cornerstone" A strategy for the development of cultural activity and its benefits in the South East	Despite its substantial achievements much of the region's cultural potential goes untapped. This report seeks to point the way towards unlocking some of those unrealised possibilities, in the interests of greater health, happiness and prosperity for all. • Deliver a high quality and rewarding experience for all visitors. • Provide a greater variety of jobs over a wide range of skills levels. • Provide stronger support for urban renaissance and regeneration, especially in the priority sub-regions. • Help to diversify and develop further the rural economy. • Underpin and promote environmental quality and local distinctiveness in town and country. • Generate community benefits to enhance quality of life.	An SA objective should be the improvement of accessibility of key services and facilities to local communities.
"Destination South East" Regional Spatial Planning Strategy for Tourism (Proposed Alterations to Regional Planning Guidance - Tourism and Related Sport and Recreation	• Deliver a high quality and rewarding experience for all visitors. • Provide a greater variety of jobs over a wide range of skills levels. • Provide stronger support for urban renaissance and regeneration, especially in the priority sub-regions. • Help to diversify and develop further the rural economy. • Underpin and promote environmental quality and local distinctiveness in town and country. • Generate community benefits to enhance quality of life.	The promotion of tourism should inform the appraisal.
Kent Biodiversity Action Plan (BAP)	To maintain and where practicable, to enhance: • The overall populations and natural ranges of native species and the quality and range of wildlife habitats and ecosystems; • Internationally and nationally important species, habitats and ecosystems; • Species, habitats and natural and managed ecosystems that are characteristic of Kent; • The biodiversity of natural and semi-natural habitats, where this has diminished over recent decades. • To increase public awareness of, and involvement in, conserving biodiversity. • To identify priorities for habitat and species conservation in Kent and set realistic targets and time-scales for these.	The SA/SEA should include objectives relating to the conservation and enhancement of biodiversity and habitats with a range of species indicators.

Plan	Key aims and objectives	Implications for SA
Catchment Abstraction Management Strategies (CAMS) in Southern Region: Medway CAMS	The CAMS gives more information on the current status of water resource availability in the catchment and proposes a management/licensing policy to improve the sustainability of water for the future.	The SA should include objectives covering water resources and both water resources and impacts from climate change are key themes in the SA
Medway and Swale Shoreline Management Plan	This lays out the overall strategic defence of the coastline to ensure movement towards sustainable development	The SA should include objectives covering water resources and both water resources and impacts from climate change are key themes in the SA
Kent Downs AONB Management Plan	• Protect, enhance and managed the diversity of landscape character to the highest standards; • Priority habitats and sites of biodiversity will be managed in favourable condition and target species will flourish; • Conserve and enhance the network of ancient and new woodland; • Maintain and enhance the historic and cultural fabric in favourable conditions to reflect local character; • Manage the natural resources of the environment; • Promotion of sustainable development and transport; • To promote access for all.	SA objectives should include the protection of habitats, biodiversity and the landscape. Potential us of AONB as an indicator.
Kent Design Guide	Promote sustainable and good design to encourage development which safeguards what is of value whilst enriching the environment for future generations.	The SA objectives should reflect the aims of the Kent Design Guide.

Plan	Key aims and objectives	Implications for SA
Local		
Medway Local Plan 2003	- New development should follow sustainable development principles. - Urban renaissance. - Upgrade the environmental quality and image of the area. - Enhance the economic base. - Widen transport choices and accessibility. - Develop Chatham as the 'city centre'. - Invest in the River Medway. - Protection of the greenbelt. - Identifying the built heritage as an important asset. - Reduce social deficiencies.	
Kent & Medway Structure Plan 2006	- Strong cohesive communities. - Excellence in learning opportunities and in skills development. - Centre of excellence for high quality leisure and tourism. - High standards or health and social care. - Helping people to become more independent. - Safe environment where people live free from the fear of crime. - Business growth builds on existing strengths and grasps new opportunities.	The SA should take in consideration the regeneration of the waterfront sites, housing development and the expansion of the higher and Further Education sectors.
Kent Minerals Local Plan	This sets the framework for future mineral extractions in Kent. The main sections relating to Medway are - Construction Aggregates - Chalk & Clay/Oil & Gas	SA objectives relating to minerals can include transport, protection of landscape, job creation and sustainable development.

Plan	Key aims and objectives	Implications for SA
Kent Waste Local Plan	This details policies in respect of development, which involves disposal of refuse, or waste and its treatment. It identified specific sites for waste management and disposal facilities.	The SA objectives should refer to waste minimisation and management.
Medway Council's Municipal Waste Management Strategy 2005-2020	This sets out a framework for the management of Medway's municipal waste over the next 15 years, through an integrated action plan focusing on minimisation, recycling and composting.	The SA objectives should refer to waste minimisation and management.
Local Transport Plan 2	This sets out an overview of policies with the following aims: • To tackle congestion; • To deliver improved accessibility; • To make our roads safer; • To improve air quality; • To deliver sustainable regeneration; • To contribute to improving the health of Medway's residents.	SA objective required that relates to travel and the need to reduce need to travel and traffic and congestion

Plan	Key aims and objectives	Implications for SA
Medway Regeneration Framework 2006-2016	This lays out the framework for developing Medway into a city of learning, culture, tourism and enterprise. This means: • A quality, accessible service of learning and skills provision for all sectors of community, to allow local people and the economy to flourish • Provision of outstanding cultural facilities alongside celebrating existing heritage and identity • Exciting and varied choice of destinations and facilities, focusing on assets such as the castles, cathedral and historic dockyard and area of outstanding natural beauty • Growth and success of specialist manufacturing sectors, the knowledge economy based around Higher and further education, environmental technologies, creative industries, and innovation and growth within existing businesses. Allowing local people to secure better-paid jobs locally and unemployed people getting back into the workforce	The synergies between the two strategies should be incorporated in the SA objectives.

Plan	Key aims and objectives	Implications for SA
"More to Medway": Medway's Community Plan 2007-2010	This sets out the Local Strategic Partnerships key priorities for the area incorporating sustainability issues throughout. These wish to ensure the safety of children, reduce the fear of crime through reducing anti-social behaviour, increase and improve employment opportunities for local people through vocational training for all ages and realising Medway's cultural ambitions. It wishes to do this through delivery of accessible and integrated transport system supporting regeneration, enabling people to remain healthy and independent (particularly the old and vulnerable groups), cherishing and enhancing Medway's urban and rural heritage and it's important resources. It is intended that this will be done by improving the quality of life for existing and new communities by ensuring development and regeneration are matched to the natural resources and infrastructure available and empowering local people to have greater participation and influence.	The synergies between the two strategies should be fostered and promoted in the SA objectives.
Medway Community Safety Plan	To reduce crime, improve the quality of life of communities and help young people, in particular, who may have drifted into a life of crime and involvement with the criminal justice system, lead useful and satisfying lives.	An SA objective is needed in terms of crime and social objectives are key to the SA.

Plan	Key aims and objectives	Implications for SA
Medway Economic Development Statement	This gives an overview of the strategic direction of Medway's economy, setting out key aims and objectives. This includes a target growth rate of twice the national average and aims to create 40,000 jobs by 2026, planning for long-term growth and opportunities, such as the 2012 Olympics with flexibility and targeted actions. Also a short-term aim of 26,710 jobs by 2016. These will be achieved through firmly establishing Chatham as a city centre of cultural and leisure activities, work with partners to develop up-skilling, re-skilling and preparing a flexible workforce, to create suitable new employment space bringing forward brownfield sites and establishing a programme of development and support activity.	The SA should have objectives reflecting the need for improving skills and economics are a key theme of the SA.
Medway Housing Strategy 2008-2011	This is intended to maximise the supply of suitable and affordable housing to meet housing need, enable vulnerable people to live independent lives, improve the quality and energy efficiency of housing, develop sustainable communities and promote neighbourhood renewal and promote better and fairer access to housing services.	An SA objective is needed relating to good access to decent quality housing and is a theme of the SA.
Medway and Medway NHS: 2008 Joint Strategic Needs Assessment	This highlights the key priorities to improving health and wellbeing within Medway and reducing inequalities.	An SA objective is needed in relation to health and reducing health inequalities.
Medway Rural Action Plan	This is intended to be followed by an implementation plan. People should be able to look forward with confidence to a positive and sustainable future for rural Medway. Our villages should have vibrant communities that feel safe and supported and who are pleased with the quality and choice of services and facilities available to them. Medway's countryside should be more widely valued and enjoyed as an important natural asset to build positive relationships between rural and urban Medway.	SA objective needed in respect to landscape and accessibility is key theme of the SA.

Plan	Key aims and objectives	Implications for SA
Medway Wildlife, Countryside and Open Space Strategy 2008-2016	Aims to improve year on year the residents opinion poll ratings, address the findings of the open space quality and quantity audits, celebrate the strengths of the countryside and open space resources and secure internal and external funding, through the following: • Providing more high quality facilities; • Improved monitoring and management; • Prioritised investments; • Improved protection and conservation; • More open spaces contributing directly to regeneration; and • Greater celebration and engagement.	An SA objective is needed in relation to landscape areas and accessibility is a key theme of the SA.
Opportunities in the Third Age: Improving the Life of Older People in Medway	This focuses on the steps needed to enhance and maintain the contribution of older people to the community, with the main aim being to assist older people to live independently and be active and healthy.	
“Making Life Better for Children in Medway” Medway’s Children and Young People’s Plan 2006-2009	Main aims are to: • Safeguard children and young people who are vulnerable or at risk • Raise achievement of children in schools • Improve services for children with disabilities • Improve services for vulnerable children and their families • Reduce rate of childhood obesity and • Improve employability of young people.	

Plan	Key aims and objectives	Implications for SA
Medway's Sports Development Strategy 2005-2010	This is intended to guide sports development over the next 5 years. Medway will be a place where all young people get a good start in sport and recreation, people of all ages will have the opportunity to stay involved in sports and recreation throughout their lives, people will be encouraged to adopt a healthy lifestyle through active living and enable socially disadvantaged to feel included and all participants have the opportunity to improve and achieve their own personal sports goals.	

Glossary

SEA	Strategic Environmental Assessment
SA	Sustainability Appraisal
EA	Environment Agency
LDF	Local Development Framework
LDD	Local Development Documents
DPD	Development Plan Document
SPD	Supplementary Planning Document
RSS	Regional Spatial Strategy
PPP	Policies, Plans & Programmes
SPA	Special Protection Area
SAC	Special Area of Conservation
SSSI	Site of Special Scientific Interest
RAMSAR	Wetland site covered by the Ramsar Convention
AONB	Area of Outstanding Natural Beauty
RIGS	Regionally Important Geological and Geomorphological Sites
SAM	Scheduled Ancient Monuments
UNESCO	United Nations Education Scientific and Cultural Organisation
AQMA	Air Quality Management Areas
CCS	Carbon Capture and Storage
CCGT	Combined Cycle Gas Turbine
CHP	Combined Heat & Power
RSPB	Royal Society for Protection of Birds
ONS	Office for National Statistics
NVQ	National Vocational Qualification
MI/d	Million litres per day
AoD	Above Ordnance Datum
LTP2	Local Transport Plan 2
WFD	Water Framework Directive

Appendix 4

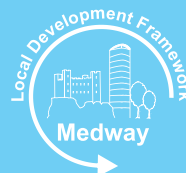


Medway Local Development Framework



Medway Initial Sustainability Appraisal

July 2009



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Glossary

Glossary

SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
EA	Environment Agency
DPD	Development Plan Document

Non - Technical Summary



Non - Technical Summary

1. This Sustainability Appraisal assesses the implications of various options raised in the separate 'Issues and Options' report, which will inform the preparation of a Local Development Framework Core Strategy for Medway. It has been prepared in accordance with the relevant guidance, including Planning Policy Statement 12. This states, *"Sustainability assessment should inform the evaluation of alternatives. It should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given the reasonable alternatives."*

2. This document has been produced independently from the 'Issues and Options' report and it can be used to assess and compare the options within the main document, by considering the sustainability implications of each one.

3. The potential options have been assessed against the framework set out in the Medway Sustainability Appraisal Scoping Final Report (April 2009) ⁽¹⁾. However when considering the assessment it should be borne in mind that:

- There is often considerable natural variability in sustainability issues, for example small changes in either climate or people's actions can have a large impact while other changes will have a lower impact.
- Environmental, social and economic issues can be difficult to quantify or measure with a high degree of accuracy. At this stage the general trends have been focused on, or where necessary, previous trends taken into account, to help address this issue.
- Uncertainty about exact implementation – with a 'broad-brush' strategy it is difficult to assess this in detail.

4. There are many issues outlined within the 'Issues and Options' Report. Many of these have not been assessed in this report due to the fact that they are likely to be addressed with a locationally specific remedy, such as focusing retailing within Chatham Town Centre. In this respect they are considered to be either givens in terms of the strategy or of an insufficient scale to require a separate appraisal.

5. In respect to land-won aggregates, there are 3 solutions that have been appraised. 6 solutions have been appraised in terms of provision for treatment, processing and disposal of waste. Finally the spatial options have been appraised in terms of housing and employment.

Overall conclusions

6. Of the three solutions appraised for creating provision for land-won aggregates, extensions to the existing sites around Hoo would be the most sustainable. It would have a neutral impact in terms of the natural environment, with the slight potential for improvement over the longer term, and is the closest to the existing road network.

7. The most sustainable of the solutions for waste treatment, processing and disposal would be an extension to the existing Viridor site as it has good access to the existing road network, would benefit the local economy and community more directly and have the least impact on the environment. However due to location this is only slightly better

1 http://www.medway.gov.uk/final_scoping_report.pdf

Non - Technical Summary

than a treatment/processing hub at Kingsnorth. The disposal options would be the least sustainable, however these may be needed to fully deal with all waste.

8. In terms of the spatial options being used to accommodate housing, there are similarities between Lodge Hill, Chattenden and the Extended Hoo options in that they would have a beneficial effect on social, economic and also environmental objectives.

9. Though development near to Rainham would have advantages for the immediate area, it would also have detrimental impacts on the immediate and wider context. Of the solutions assessed Capstone would be the least sustainable as it would have a number of detrimental effects.

10. When employment land is accommodated within the spatial options, the most sustainable solutions would again be either within Lodge Hill or Extended Hoo and therefore focused to the north. These are closer to existing infrastructure, with Lodge Hill likely to provide the greatest mix of employment opportunities.

11. When located in Rainham, there would also be a number of benefits if properly integrated with the existing town centre. However these would not be as well located for transport links and accessibility of services.

12. Capstone would have the most detrimental impacts. As such this would be the least sustainable location.

1. Introduction



1. Introduction

1.1 Officers within the Development Plans & Research team at Medway Council are drawing up the Core Strategy. The Senior Planner (Environmental Policy) completed this SA, incorporating the SEA, independently from the team.

1.2 The 'Issues and Options' consultation document sets out the main issues and evidence surrounding particular topics and put forward a range of options to tackle these issues.

1.3 This report accompanies the 'Issues and Options' report. It fully assesses each of the broad spatial options considered and includes a preliminary assessment of options for land won aggregates and waste treatment and disposal facilities. The latter will inform subsequent work as the Core Strategy is drawn up. The assessment corresponds to Stage 2 within the guidance ⁽²⁾, developing and refining options, particularly Tasks B1 and B2, described as follows:

B1: Testing the DPD objectives against the SA framework; and

B2: Developing the DPD options.

1.4 This stage (Stage B) of the SA / SEA highlights the sustainability implications of each option, and where necessary, suggests recommendations for improvement. The results of the appraisal will inform the decision making process on the options, but it will not determine which should be chosen.

1.5 The SEA Directive requires that the Environmental Report should consider 'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme' and it should 'give an outline of the reasons for selecting the alternatives dealt with'.

1.6 Given the strategic nature of the Core Strategy, and consequently the objectives and various approaches, the assessment is inevitably very broad brush. It has not, at this stage, taken into account the detailed implications of different policy approaches.

1.7 Further Sustainability Appraisal work will be undertaken in conjunction with the development of the next stage of the Core Strategy and a full assessment of the final Core Strategy will be carried out.

2 Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (2005); ODPM

2. Methodology



2. Methodology

2. Methodology

2.1 An initial Scoping Report for Medway's SA/SEA was published in December 2008 and a Sustainability Appraisal Scoping Final Report in April 2009 ⁽³⁾.

2.2 The final report sets out 16 objectives that will be used to assess proposals throughout the preparation of the Core Strategy. These are reproduced in Table 1 below.

Table 1: Sustainability Appraisal Objectives

1	Biodiversity, Flora and fauna	Conserve and enhance the diversity and abundance of habitats and species
2	Air	Reduce air pollution and improve air quality, including reduction of greenhouse gas emissions
3	Water and Soil	Maintain and improve quality of ground and surface waters and security of supply
4	Climatic factors	Reduce risk of flooding and ensure flood resilience of buildings and minimise the effect on public services and infrastructure
5	Climatic factors	Reduce ecological footprint through prudent use of natural resources, reduction in waste and use of sustainable waste management practices
6		Provide opportunity for everyone to live in a decent, sustainably constructed, affordable home suitable to their needs
7		Maximise land use efficiency through appropriate use of previously developed land and existing buildings
8	Human Health	Improve the health and well-being of the population and reduce health inequalities
9	Population	Reduce inequalities in poverty and social exclusion
10	Population	Reduce crime and the perception of crime
11	Material assets	Improve accessibility to key services and facilities (inc. countryside, leisure/recreation and historic environment)
12	Cultural Heritage & Landscape	Conserve and enhance historic buildings, archaeological site and culturally important features and increase engagement by all sections of community
13	Material assets & climatic factors	Increase energy efficiency; the proportion of energy generated from renewable sources and the diversity and security of energy supplies
14		Reduce traffic and congestion by reducing need to travel and improving

3 www.medway.gov.uk/final_scoping_report.pdf

		travel choice
15		Raise educational achievements through developing opportunities to acquire skills, to develop and maintain workforce
16		Support and improve employment and economic competitiveness in town centres and deprived areas

2.3 The tables in the appendix show the assessment of the main options considered within the Issues & Options document and also some that, due to the outcome of the appraisal process, were not considered any further. These tables show the ratings of each option against the sustainability criteria above.

2.4 The appraisal of these options was primarily carried out by the Senior Planner (Environmental Policy) Officer but with support, where necessary, from colleagues within the Development Plans and Research Team and other sections of the Council.

2.5 When looking at the results summarised in the next section and those within the Appendix the following points should be taken into account.

- There is often considerable natural variability in sustainability issues, for example small changes in either climate or people's actions can have a large impact while others can have a small impact.
- Lack of precision – environmental, social and economic issues can be difficult to quantify or measure with a high degree of accuracy. At this stage the general trends have been focused on, or where necessary, previous trends taken into account, to help address this issue.
- Uncertainty about exact implementation – with a 'broad-brush' strategy it is difficult to assess in detail. Nevertheless the conclusions reached are considered to be robust.

2.6 Each option was appraised in terms of its potential impacts and its contribution to the realisation of the SA objectives over the short, medium and long-term. Though cumulative impacts need to be considered at this stage, to minimise the many possible permutations, it was assumed that the option under assessment would be implemented in isolation.

2.7 At this stage the appraisal highlights broad impacts and trends to identify the most sustainable options. Each option was considered in terms of its potential effects on the current baseline information and taking account of previous, existing and expected trends, to assess the likelihood of future impacts. This approach will help in the development of potential monitoring measures during the next stages of developing the Core Strategy.

2.8 The options and the result of the appraisal are discussed in the next section. The detailed results of the appraisals are then shown in the Appendix.

2.9 In the appendix tables, where applicable, there is an accompanying commentary to explain any assumptions made. However if there are assumptions that have been applied across all options, these have been outlined in the preceding text. These importantly include any mitigation measures that will need to be considered during the

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next stage of the SA.

3.10 The scoring system shown below was used to compare each of the options against the framework.

xx	Very negative
x	Slightly negative
-	Approximately constant (neutral)
✓	Slightly positive
✓ ✓	Very positive

Table 2: Scoring system

3. Summarised Results



3. Summarised Results

3.1 There are many issues outlined within the 'Issues and Options' Report. Many of these have not been assessed in this report due to the fact that they are likely to be addressed with a locationally specific remedy, such as focusing retailing within Chatham Town Centre. In this respect they are considered to be either givens in terms of the strategy or of an insufficient scale to require a separate appraisal.

3.2 The main issues that have been focused on are as set out below.

Table 3: Main sustainability issues

Land won aggregates	
1A	Cliffe Deep Buried Channel Deposits
1B	Hoo Terraces
1C	Grain Terraces
Waste Treatment and disposal facilities	
2A	Focus reuse and recycling/processing facilities in and around Kingsnorth
2B	Extension of Viridor's existing site at Medway City Estate
2C	Use of unused land at Chatham Port
2D	Halling Coal Yard and Wharf
2E	Void Creation within London Clay on Hoo Peninsula
2F	Landraising on Hoo Peninsula
New Housing	
3A	Within Urban area and CHATTENDEN (LODGE HILL)
3B	Within Urban area and EXTENDED HOO
3C	Within Urban area and CAPSTONE
3D	Within Urban area and NORTH RAINHAM
3E	Within Urban area and EAST RAINHAM
Employment Land	
4A	Rochester Airfield; Kingsnorth; Grain and CHATTENDEN (LODGE HILL)
4B	Rochester Airfield; Kingsnorth; Grain and GREATER HOO

3. Summarised Results

4C	Rochester Airfield; Kingsnorth; Grain and CAPSTONE
4D	Rochester Airfield; Kingsnorth; Grain and NORTH RAINHAM
4E	Rochester Airfield; Kingsnorth; Grain and EAST RAINHAM

Land-won aggregates solutions

3.3 There are 3 solutions that might address this issue that have been assessed. Due to their locations they have been termed Cliffe Deep Buried Channels, Hoo Terraces and Grain Terraces.

Assumptions

3.4 The assumption applying to all of these solutions is that all relevant permissions required from the Environment Agency (EA) would be allowed with their own strict conditions. All are producing materials that would be used within some type of construction and as such, they are all considered to contribute towards the objective of allowing everyone the opportunity to live in a decent, sustainably constructed, affordable home suitable to their needs.

3.5 In addition, it has been assumed that due to the site characteristics with respect to absorption, all solutions would have a neutral impact in terms of flood risk.

3.6 In terms of the social objectives, it is considered that none of the solutions would improve accessibility to key services or facilities. In addition, there are likely to be no additional buildings and due to the locations, there would be no impact on conserving or enhancing the historic environment.

3.7 1A: Cliffe Deep Buried Channels – A potential solution to providing land-won aggregates needed to meet the requirements of the South East Plan would be through the creation and extraction of material from a set of deep buried channels on the Hoo Peninsula. This would be expected to be located near to Cliffe and so has been appraised on this basis.

3.8 Due to its proximity and the level of work required for the extraction and liberation of materials this solution is considered to have a detrimental impact on the integrity and abundance of species located in the Special Protection Area (SPA). It is also considered that a significant by-product would be the release of gases and particles into the air, so having an effect on the relatively pristine air quality of the location and place a greater level of stress on water supplies than the other potential solutions, due to the amount of over-burden that would need washing and treating.

3.9 The location of this solution means that it would result in a negative impact on the objective of trying to reduce traffic congestion. This is because there are no wharves on this part of the river and it would be uneconomical to introduce one. The result of this is that movements to and from the site would be reliant on the road network and this solution is located furthest from the existing main road network.

3.10 1B: Hoo Terraces – another solution would be through allowing up to three extensions to an existing consented site to the South East of Hoo St. Werburgh. The

main assumption made with this option is that as the main site already has permission, existing conditions would be applied across the whole of the new site areas.

3.11 On the basis of the above assumptions it is considered that there would be a neutral impact over the short and medium term on biodiversity, flora and fauna, with the potential for slightly improving the environment over the longer-term, due to a condition expecting the site to be returned to its natural state. This option is the closest to the existing road network, meaning that it would have a neutral impact on traffic congestion. Due to the proximity of the sites to Hoo, this solution would maintain and develop the workforce, with the potential to improve educational achievements.

3.12 However as with the other solutions there would be a slight increase in the ecological footprint of the area into the medium-term, a slight detrimental impact on air quality and potentially place pressure on water supplies.

3.13 1C: Grain Terraces – a third solution would be to recommission an existing site extracting sand and gravel within the Grain terraces.

3.14 This solution, similarly to Hoo, would mean that the workforce would be maintained and potentially developed, along with the possibility of raising educational achievements. In addition, it is considered that due to its location this site would have a neutral impact on biodiversity, flora and fauna.

3.15 However, it is considered that as this would mean recommissioning, crime or at least the perception of crime, would be likely to increase over the short and medium term. Also similarly to the other solutions it is expected that there would be some impact on air quality and that it would contribute towards additional pressures on water supplies.

Sustainability of aggregate solutions

Of the three solutions, extensions to the existing sites around Hoo would be the most sustainable as it would have a neutral impact in terms of the natural environment, with the slight potential for improving it over the longer term, and it is the closest to the existing road network.

Waste treatment and/ or disposal solutions

3.16 There are 6 potential solutions to address this, which can broadly be split into treatment/processing and then disposal. The majority cover the first area. These are: focusing in and/or around Kingsnorth; Viridor's existing site at Medway City Estate; Chatham Port and Halling Coal Yard. Two others were considered for possible waste disposal. These would both be within the London Clay on the Hoo Peninsula. These would be void creation and land raising.

Assumptions

3.17 The main assumption for the assessment of these options is that the disposal solutions would only address those residuals left, following as much treatment or processing as possible in the higher part of the waste hierarchy.

3. Summarised Results

3.18 It is also assumed that as with aggregates, all the relevant permissions would have been gained from the EA and meet its strict controls.

3.19 2A: Treatment/processing technologies hub in/or around Kingsnorth – this solution would involve the creation of a hub or cluster of technologies for processing or treating waste that would be located in and/or around Kingsnorth. The main assumption applied is that it would be located within the area designated in the local plan for employment.

3.20 This solution would contribute towards a reduction in the ecological footprint of the area and sustainable waste management practices significantly. It would also significantly contribute towards maintaining and developing the workforce, as well as educational achievements and the economic competitiveness of the area.

3.21 There would also be the potential for contributing towards energy efficiency and addressing diversity and security of supply issues. Use of land would be mainly on previously developed land and this option could also help to reduce poverty and social exclusion.

3.22 However, as the area is bounded around the majority of the south and east by a RAMSAR site and SPA, it is considered that however strong the controls are, there would still be indirect impacts on this site, such as additional materials, which would also affect air quality. Being slightly further from the main road network it is also considered that this solution would increase traffic congestion.

3.23 There would be no impact on water supply, the flooding situation, conservation or enhancement of the historic environment, the accessibility of key services and facilities or crime or the perception of crime. As many of these technologies are still evolving there is insufficient information to make an accurate assessment in terms of human health, so is currently assessed as remaining constant, given the assumption of licences from the EA.

3.24 2B: Viridor's Medway City Estate site – this solution would involve an extension to the existing site that Viridor have on the Medway City Estate.

3.25 Due to the site's location it is considered that it would positively contribute towards reducing the ecological footprint of the area, as well as contributing to increasing diversity of energy supplies and use of previously developed land.

3.26 Furthermore, as with the Kingsnorth solution, this would maintain and develop the existing workforce, as well as contributing to the economic competitiveness of the area. Its location would also mean that it would have a neutral impact on biodiversity, flora and fauna.

3.27 In general, this solution would have a neutral impact on the environmental objectives of water supply and flooding, as well as housing provision, human health and the other social objectives.

3.28 2C: Chatham Port – this solution would involve a reorganisation of an existing site at Chatham Port that both transfers and processes waste, to allow for greater provision of processing to occur.

3.29 This solution would make a significant contribution towards reducing the ecological footprint of the area and sustainable waste management practices, appropriate use of previously developed land and improving the economic competitiveness of the area. There would also be a slight improvement in the short to medium term, in terms of maintaining and developing the workforce, reducing traffic in the long term and increasing diversity of energy supply in the medium and longer term.

3.30 It is expected that either no contribution would be made towards the other objectives, both environmental and social or that they would have a neutral impact.

3.31 2D: Halling Coal Yard – this would involve the current coal yard site, at Halling, receiving a change of use to a waste use.

3.32 The main advantages of this solution are that it would make a substantial contribution towards reducing the ecological footprint of the area and sustainable waste management practices, as well as making an appropriate use of previously developed land. In addition, it would potentially help to maintain and develop the workforce over the medium and longer term, as well as potentially in the medium and longer term affecting diversity of energy supplies. Water quality may improve in the medium and longer term due to the reduced run off from the site. The site would have to be land raised to avoid the effects of flooding and this would have a negative impact on flora and fauna due to changes in river flows.

3.33 In general the majority of objectives are either unlikely to be affected or there would be a neutral impact. The only detrimental impact from this solution would be increasing congestion, due to increased traffic.

3.34 2E: Void creation – this solution would involve the creation of a new void space within which residual waste left over after all processing and treatment possible has occurred could be deposited. This would be done through the excavation of London Clay along a strip on the Hoo Peninsula.

3.35 The main issue in terms of appraising this solution was the lack of an identified market for the clay that would be excavated in order to create the void.

3.36 This solution would contribute to maintaining and developing the workforce, as well as over the medium and longer term contributing to reducing the area's ecological footprint and improving sustainable waste management practices.

3.37 This solution would be unlikely to have an effect on biodiversity, flora and fauna; water supplies; flood risk; human health or the other social objectives of reducing crime and the perception of crime and accessibility to key services and facilities.

3.38 However, in the short and medium term there would be an impact on air quality, a detrimental impact in the short term on the ecological footprint, through the excavation of the clay without a full market for it. It would also be detrimental while operational by reducing access to the countryside. Furthermore energy efficiency would be detrimental in the short term due to the machinery needed to carry out the excavation and it would have a detrimental impact over all timescales on traffic congestion due to increased movements, particularly on minor roads.

3.39 2F: Land raising – again this solution would be intended to deal with the residual

3. Summarised Results

element and would occur within the London Clay on the Hoo Peninsula.

3.40 As with the void creation solution, this would not affect or have a neutral impact on biodiversity, flora and fauna; water supplies; flood risk; human health or the other social objectives of reducing crime and the perception of crime and the accessibility to key services and facilities.

3.41 The benefits of this solution would be through contributing to sustainable waste management practices over the medium and longer term. There would also be the advantage of maintaining and developing the workforce, although it would not help any town centres or deprived areas in terms of their competitiveness in the short or medium term.

3.42 It would also be expected that in the short and medium term, accessibility, cultural features and energy supplies would all be affected detrimentally. Additionally due to the location, as for the void creation solution, there would be a detrimental impact on traffic congestion over all timescales due to increased movements, particularly on minor roads.

Sustainability of waste solutions

The most sustainable of these solutions would be an extension to the existing Viridor site as it has good access to the existing road network, would benefit the local economy and community more directly and have the least impact on the environment. However this is only slightly better than a treatment/processing hub at Kingsnorth due to location. The disposal options would be the least sustainable, however these may be needed to fully deal with all waste.

Housing Solutions

3.43 The potential alternative solutions for addressing this issue reflect those in the Issues & Options document. The first to be considered is development at Lodge Hill, Chattenden. The others are alternatives if this were not to come forward. They would involve development in the following areas: - Hoo and nearby villages; Capstone, from the administrative boundary to the edge of the Country Park; North of Rainham to the edge of the authority's area and East of Rainham to the authority's boundary.

3.44 3A: Lodge Hill, Chattenden – this solution would involve the construction of approximately 5,000 houses to be located on the ex-MoD site of the Lodge Hill training camp, as outlined by Thames Gateway Policy Documents. This would be located to the north of the existing urban area, on the edge of the existing settlement at Chattenden.

3.45 This solution would make a significant contribution to the objectives of providing a decent, sustainably constructed, affordable home and an appropriate use of land through using previously developed land over all time periods. It would also be expected that energy efficiency would be increased, as well as increasing the amount of energy produced from renewable sources, due to the fact that this development will be delivered

later in the plan period and so will have to achieve the highest levels of the Code for Sustainable Homes or be zero carbon. As such, they would consequently make a significant contribution to reducing the ecological footprint of the area.

3.46 The location of this solution would mean that it is further away from existing facilities. However, as this would essentially be a blank canvas, a number of facilities or services could be factored in at the design stage. If this is done then this could improve access to key services and facilities.

3.47 Locating housing on this site would make a substantial contribution towards increasing the economic competitiveness of the area, as well as maintaining and developing the workforce and increasing educational achievements. Particularly if an expected fast track bus service were introduced to relieve pressure on the road network then this would allow good access to Medway City Estate and town centres, as well as there being easy access to existing connections across the Peninsula. The impact on employment, skills and economic competitiveness is expected to begin in the short term and continue into the long term due to increased accessibility of services and housing provision driving retention of higher skilled workers within the area.

3.48 If new facilities and transport links were included then it would also be expected that this solution would contribute towards many of the social objectives by improving health equalities, poverty and social exclusion. Similarly to the expected benefits discussed above these would have an immediate effect that would increase through the long term. However it is not expected that there would be any impact on the level of crime or the perception of crime.

3.49 It is considered that the scale of the proposal means it would have a detrimental impact on air quality and water resources. It is expected that the impacts will be greatest during the construction phase of development and so detrimental in the short term. However due to their nature it is expected that associated issues will remain into the medium and long term to a lesser extent as a result of by-products being released from processes, such as energy generation. Both due to the location of Chattenden Woods SSSI next door to the site and its scale there will undoubtedly be both direct and indirect impacts on biodiversity, flora and fauna. However it is expected that these could be addressed through the introduction of mitigation measures.

3.50 This solution would be expected to result in some negative impacts although it is expected that these should be relatively limited and that mitigating measures could be put in place to address these. Though the site is slightly further away from the main urban area if service facilities and transport are integrated from the beginning of the process, it is believed that this would make a positive contribution to the area with the least harmful impacts.

3.51 3B: Extended Hoo – this alternative would involve a similar number of dwellings (circa 5,000) being spread throughout the existing settlement of Hoo St Werburgh and also the neighbouring villages of High Halstow and Cliffe Woods to create a village cluster. Therefore this would again focus development to the north of the existing urban area and although stretching the villages still preserve the space between them. The scale of this solution would be much smaller on an individual basis but still form a similar provision overall.

3. Summarised Results

3.52 Similarly to the Lodge Hill solution, this would substantially contribute to appropriate use of land; providing decent, sustainably constructed dwellings, and consequently reduce the ecological footprint of the area, throughout all time periods.

3.53 This solution would make a positive contribution to the economic competitiveness of the area, maintaining and developing the workforce, as well as improving educational achievements, beginning in the short term and continuing into the medium and longer term. There may also be some potential for some benefit from this solution to conserving and enhancing the historic environment and other material assets of the area.

3.54 It is considered that there would be limited impact on traffic congestion and travel choice due to the proximity to the existing road network. There would be no significant impact on crime or the perception of crime.

3.55 At present the main facilities serving this area are located within the main centre of Hoo. The addition of housing throughout the villages would increase the pressure placed on these and as such could result in a reduction in accessibility of these services and facilities. This is compounded by the distance of the villages from the main urban area.

3.56 The main impacts from this solution on the natural environment would be in terms of encroachment onto green field land. Where inevitably development is not on previously developed land there would also be direct harmful impacts on biodiversity, flora and fauna. Additionally in the short term, during construction, there would be some impact on air quality and water supplies.

3.57 **3C: Capstone** – this solution would involve development to the south of the existing Capstone Country Park, bridging the valley in a U shaped configuration. This would go across the boundary with Maidstone and overall provide substantially more housing, although for the purposes of this appraisal only the area of the site within Medway has been appraised. This would be located to the south of the existing urban area.

3.58 Though this solution could have the potential to improve poverty and social exclusion in the short and medium term, as well as increasing the diversity of energy supplies and providing decent, sustainably constructed homes, these benefits are heavily outweighed by the detrimental impacts that would result from this solution.

3.59 This solution is assessed in general as having a neutral effect on the social objectives as more information is required for a judgement to be made. For many factors the potential impact would be very dependent on implementation.

3.60 However, this solution would result in the direct loss of a substantial green field site that currently acts as a green lung. As such it would be detrimental to the biodiversity, flora and fauna of both the immediate and wider area. The introduction of a development in this area would also impact on air quality and put additional pressure on the existing water supply and treatment network.

3.61 Furthermore, the loss of this open space for development may increase the potential of flood risk in the area and there would be increased pressure on the road network. These impacts would all occur from the short term through to the longer term and even with mitigation would still have at best a neutral impact. As a result this solution

would substantially increase the ecological footprint of the area and essentially be unsustainable.

3.62 3D: North Rainham – this solution would accommodate a development of a similar scale to that proposed for Lodge Hill. It would be envisaged that this would extend across from the Gillingham Link Road (A289) in the west across to the boundary with Swale to the east, extending the existing urban area to the Lower Rainham Road.

3.63 The main benefits of this solution come due to the relative proximity to the existing urban area and town centre of Rainham. It would have the advantages of providing housing, as well as over the short and medium term improving health and reducing poverty and social exclusion as access to services are improved. It would also have the potential of increasing energy generated from renewable sources and the diversity of supplies, as well as improving educational achievements through the proximity of services. This would have a knock on effect of helping the economic competitiveness of Rainham town centre and those deprived areas nearby.

3.64 There are many social benefits to this solution, however this would again mean an incursion into green field land, which is important for biodiversity, flora and fauna within both the immediate and wider area. Recent trends suggest that the loss of this type of land is likely to have a greater impact over time. The loss of this land and the work involved in construction would mean that in the short term air quality, flood risk and water stress is likely to result. However it would be expected that mitigation could be put in place to lessen these over the longer term. Another direct impact would be on traffic congestion and the road network with the introduction of a substantially larger quantity of traffic along minor roads.

3.65 3E: East Rainham – this solution would also be of a sufficient scale to act as a replacement for Lodge Hill. This would extend development from the edge of the existing urban boundary across to the Authority's boundary with Swale, being located to the south of the A2 with some development to the north of Moor Street.

3.66 The impact of this solution, similar to that for North Rainham, would be reliant on the relative proximity of the urban area and Rainham town centre. Again it is likely that the main benefits from this solution would be social, through providing housing and improving accessibility to key facilities and services, resulting in an improvement in health and social exclusion.

3.67 The detrimental impacts of this solution are again similar with the site being green field land and its loss affecting biodiversity, flora and fauna. In the short term through the loss of this habitat and through construction there would be likely to be some impact on air quality and flood risk, although over the medium and longer term these are likely to be mitigated against and so have a neutral impact.

3.68 However development on this site rather than to the north would be expected to put a greater strain on linking to the existing water supplies and treatment facilities in the short and medium term. There would also be a substantial increase in traffic along minor parts of the road network and so would be expected to cause a greater strain than if located to the north.

3. Summarised Results

Sustainability of housing solutions

There are similarities between Lodge Hill, Chattenden and the Extended Hoo options in that they would have a beneficial effect on social, economic and also environmental objectives. Though development near to Rainham would have advantages for the immediate area, it would also have detrimental impacts on the immediate and wider context. Of the solutions assessed Capstone would be the least sustainable as it would have a number of detrimental effects.

Employment Land Solutions

3.69 As with housing there are five solutions for addressing this issue. These reflect those for housing, in addition to a set of assumed givens of employment land designations at Kingsnorth; Grain and Rochester Airfield from the strong existing policy direction. Assessments for these solutions have therefore been done in terms of the potential impact of the spatial options combined with these sites.

Assumptions

3.70 Within the assessment of all of these solutions the employment areas considered are as defined in the local plan, to help to quantify potential impacts.

3.71 4A: Kingsnorth; Grain; Rochester Airfield and LODGE HILL, Chattenden – this solution would involve approximately 70,000 sq m of employment being provided within the new settlement. Due to its location this would inevitably focus employment to the north, with only the town centres and the Airfield accommodating employment elsewhere.

3.72 There would be many social benefits to siting new employment land within the new settlement as well as those existing areas. The most obvious and immediate of these would be the appropriate use of previously developed land; maintaining and developing the workforce, as well as improving the educational achievement slightly in the short term and this increasing through the medium and longer term. This would also make a substantial contribution to energy supplies from renewables and energy efficiency, because the expected time this would be delivered means it would have to be low carbon or carbon neutral.

3.73 In addition, there are many other social benefits and also some environmental ones. An overall benefit from additionally siting employment in this area would be an improvement of accessibility to key facilities and services, which would also mean that there would be a resultant improvement in health equalities, reduction in poverty and social exclusion, as well as crime and the perception of crime.

3.74 Furthermore an employment area could conserve and enhance the existing historic environment directly and indirectly. Siting of employment in this area would also mean that there would be a shorter distance from housing to employment and good access from the town centres, meaning that it would substantially improve traffic congestion and travel choice.

3.75 However, it would be likely that in the short term siting employment in this area will affect biodiversity, flora and fauna; air quality and soil condition and water supplies. There would be a neutral impact on flood risk, the ecological footprint of the area and housing provision.

3.76 4B: Kingsnorth; Grain; Rochester Airfield and Extended Hoo – this solution would focus more employment within Hoo and the neighbouring villages. This solution, as with that for Lodge Hill, would focus employment in the north of the Authority's area.

3.77 The main benefits from locating employment land within Hoo and the neighbouring villages are mainly social with a few immediate impacts on the environment in the short term.

3.78 This solution would make a substantial improvement to the economic competitiveness of town centres; the appropriate use of previously developed land (at Grain, Rochester Airfield and Kingsnorth); conserving and enhancing the historic environment from the short term through to the longer term. In addition it would be expected that locating employment within Hoo and the neighbouring villages would allow for an increase in energy efficiency and energy from renewable sources. However this would not be as encompassing or as immediate as being located within the Lodge Hill settlement as these would be developed throughout the plan period and so could only be expected to be within the national timescales for creating a low carbon economy (which outlines non domestic buildings as being zero carbon by 2019).

3.79 Addressing employment land with this solution would increase the accessibility to key facilities and services, meaning that there would be an improvement in health equalities, through being near to existing facilities and increasing provision in this area. The combination of increased accessibility and increased employment within the area should result in a reduction in poverty and social exclusion, as well as crime and the perception of crime from the short term through to the longer term. Furthermore, this solution would allow for employment nearer to existing housing and town centres, meaning that traffic congestion should be reduced and travel choice increased.

3.80 By locating employment within this area the impact on the environment would be lessened. There would be an impact on air quality, water supplies and treatment and flood risk over the short term, although from the medium term onwards the impact would become neutral. There would be no benefit to but also no detrimental impact from this solution on biodiversity, flora and fauna, decent sustainably constructed homes or the ecological footprint of the area.

3.81 4C: Kingsnorth; Grain; Rochester Airfield and Capstone – this solution would mean that in addition to the given sites, employment land should be provided on the site between the urban area and the existing Capstone Country Park. This solution would result in employment land being spread more evenly across both the north and south of the Authority's area.

3.82 This solution would have the main benefit of providing a route for maintaining and developing the workforce and in so doing reducing poverty and social exclusion.

3.83 As this solution would be involve a green field site and one located next to the Country Park, there would be a detrimental impact on biodiversity, flora and fauna, as well as flood risk, water supply and treatment and air quality. Furthermore the results

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of all these impacts mean that it would be an inappropriate use of land and would increase the ecological footprint of the area.

3.84 4D: Kingsnorth; Grain; Rochester Airfield and North of Rainham – this solution would mean that employment land was accommodated within an extension to the urban area to the north of Rainham up to the edge of the Riverside Country Park and over to the Authority's boundary. This would result in employment land having a greater focus in the east of the area.

3.85 As with many of the other solutions for addressing this issue the main benefits from siting employment land within North Rainham are social and economic. It would also be closer to existing housing. As such, it would mean that although in the short term there would be an increase in traffic congestion, this would become neutral in the medium term and would in the long term improve travel choice.

3.86 The other main benefits as with all the solutions is maintaining and developing the workforce and improving the educational achievements of the area. Though this would have an immediate impact this would increase into the medium and long term. Linked to this, siting employment in this area would mean that there should be a reduction of poverty and social exclusion. In addition, health equalities should improve in the long term once extra services and access to them are established.

3.87 This solution would mean that conservation and enhancement of the historic environment and cultural heritage would benefit, as well as energy efficiency and energy from renewable sources having greater potential than some of the other alternatives.

3.88 However, this solution would mean an incursion into green field land affecting biodiversity, flora and fauna. Furthermore, in the short term air, soil and water supplies and flood risk would be detrimentally affected. The combination of these facts means that this solution would increase the ecological footprint of the area.

3.89 4E: Kingsnorth; Grain; Rochester Airfield and East of Rainham – this solution would involve employment land being accommodated within an urban extension to the east of Rainham. It would mean that employment land would be focused in the east of the area.

3.90 This solution would maintain and develop the workforce and improve the educational achievement of the area. It would, as with the other solutions, improve the economic competitiveness of the area. Along with the relative proximity of Rainham town centre and housing, it would be expected that siting employment within this area would improve accessibility to key facilities and services. On this basis, the introduction of employment to the area, should improve health equalities in the long term, as well as poverty and social exclusion and crime and the perception of crime.

3.91 This solution, due to its location, would not result in any improvement to the conservation and enhancement of the historic environment. It would mean that as with locating employment to the north of Rainham, there would be a detrimental impact in the short term on traffic congestion, although this should become neutral in the medium term and improve in the long term as employment is closer to the existing town centre and housing.

3.92 Even taking these benefits into account there would be detrimental impacts on

the natural environment and natural resources from this solution. This would mean an encroachment onto green field land, which would have impacts, both on the immediate and wider context on biodiversity, flora and fauna. In the short term, there would also be an impact from this solution on air quality; water supply and flood risk, although this is likely to become neutral over the medium and longer term. Industry in general is a higher user of water, although it would be expected that all water saving measures would be put in place, meaning that there would be a neutral impact. These results would mean that there would be an increase in the use of natural resources and the ecological footprint of the area.

3.93 In addition, this option would introduce more traffic onto minor roads, which will then feed onto roads where there are already identified hot spots within the network, so increasing traffic congestion.

Sustainability of employment solutions

The most sustainable of the solutions outlined would again be either within Lodge Hill or Extended Hoo and therefore focused to the north. These are closer to existing infrastructure and provide a mix of employment opportunities. The solutions around Rainham would also give a number of benefits if properly integrated with the existing town centre. However these would not be as well located for transport links or other existing infrastructure. Capstone would have the most detrimental impacts. As such this would be the least sustainable location.

Appendix 1

Appendix 1

Appendix 1

Appendix 1: Detailed Assessment of Potential Options

Land-Won Aggregate options

Option A: Cliffe Deep Buried Channel Deposits

Option B: Hoo Terraces

Option C: Grain Terraces

Issue: Provision for land-won primary aggregates												
Sustainability Objectives	Option A				Option B				Option C			
	S	M	L		S	M	L		S	M	L	
1	xx	xx	xx		-	-	✓		-	-	-	
2	xx	xx	xx		x	x	x		x	x	x	
3	xx	xx	xx		x	x	x		x	x	x	
4	-	-	-		-	-	-		-	-	-	
5	xx	xx	-		x	x	-		x	x	-	
6	✓	✓	✓		✓	✓	✓		✓	✓	✓	
7	-	-	-		-	-	-		-	-	-	
8	-	-	-		-	-	-		-	-	-	
9	-	-	-		-	-	-		-	-	-	
10	x	x	-		x	x	-		x	x	-	
11	-	-	✓		-	-	-		-	-	-	
12	x	x	-		x	x	-		x	x	-	
13	-	-	-		-	-	-		-	-	-	
14	x	x	-		-	-	-		x	x	-	
15	-	✓	-		✓	✓	-		✓	✓	-	
16	-	-	-		-	-	-		-	-	-	

Table 4

Waste Treatment and/or Disposal Options

Option A: Focus reuse and recycling/processing facilities in and around Kingsnorth

Option B: Extension of Viridor's existing site at Medway City Estate

Option C: Void creation within London Clay on Hoo Peninsula

Appendix 1

Option D: Landraise within London Clay on Hoo Peninsula

Option E: Chatham Port

Option F: Halling Coal Yard

Issue: Provision for waste treatment and/or disposal facilities																		
	Option A			Option B			Option C			Option D			Option E			Option F		
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
1	x	x	x	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	x	x	x	x	x	x	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	x	x	x	-	x	x	-	-	-	-	-	-
12	-	-	-	-	-	-	x	x	x	-	x	x	-	-	-	-	-	-
13	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	-	x	x
14	x	x	-	-	-	-	x	x	x	x	x	x	x	-	-	x	x	x
15	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	-	x	x
16	x	x	x	x	x	x	x	x	x	-	x	x	-	x	x	-	-	-

Table 5

Housing options

Option A: Urban area and Chattenden (Lodge Hill)

Option B: Urban area and Greater Hoo

Option C: Urban area and Capstone

Option D: Urban area and North Rainham

Option E: Urban area and East Rainham

Appendix 1

Issue: Provision for new housing																	
	Option A			Option B			Option C			Option D			Option E				
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		
1	-	-	x	-	x	x	x	x	x	x	xx	xx	x	x	x		
2	xx	x	x	x	-	-	xx	xx	x	x	-	-	-	-	-		
3	x	x	x	x	x	x	xx	xx	xx	x	x	-	x	x	-		
4	-	-	x	-	-	x	xx	xx	x	x	x	-	-	-	-		
5	x	x	x	-	x	x	x	x	x	-	-	-	-	-	-		
6	x	x	x	x	x	x	x	x	x	x	x	xx	x	x	xx		
7	x	x	x	x	x	x	xx	x	x	x	x	-	x	x	-		
8	-	x	x	-	x	x	-	-	-	-	x	x	-	-	-		
9	x	x	x	x	x	x	x	x	-	x	x	x	-	x	x		
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
11	x	x	x	x	x	x	-	-	-	x	x	x	x	x	x		
12	x	x	x	x	x	x	-	-	-	x	x	x	x	x	x		
13	x	x	x	x	x	x	x	x	-	x	x	x	x	x	x		
14	-	-	x	-	-	-	x	x	x	x	x	x	x	x	x		
15	x	x	x	x	x	x	-	-	-	x	x	x	x	x	x		
16	x	x	x	x	x	x	-	-	-	x	x	x	x	x	x		

Table 6



Medway Council Core Strategy

Habitats Regulations Assessment (Appropriate Assessment) Report

December 2011

enfusion



HABITATS REGULATIONS ASSESSMENT (APPROPRIATE ASSESSMENT) REPORT

Medway Council Core Strategy

<i>date:</i>	December 2011	
<i>prepared for:</i>	Medway Council	
<i>prepared by:</i>	Alastair Peattie Toney Hallahan Ruth Thomas	Enfusion Enfusion Enfusion
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Figure 1: Core Strategy Key Diagram

Figure 2: Source, Pathway, Receptor Model

Figure 3: European Site Characterisations

Figure 4: Housing, Employment and Infrastructure

Development: Summary of Impacts and Effects on European
Sites

Figure 5: Categorising the Potential Effects of the Plan

APPENDICES

- 1** European Site Characterisations
- 2** Plans, Programmes and Projects Review
- 3** Publication Draft Core Strategy Policy Screening
- 4** NKEPG Meeting Minutes
- 5** Consultation Responses

EXECUTIVE SUMMARY

- 0.1 Habitats Regulations Assessment (HRA) of spatial development plans is a requirement of the Habitats Directive (92/43/EEC) as set out in the Conservation of Habitats and Species Regulations 2010 (as amended 2011). This report details the Habitats Regulations Assessment for the Medway Core Strategy (Submission Draft). It sets out the method, findings and conclusions of the Screening and Appropriate Assessment (AA) stages of the HRA process.
- 0.2 The first stage of the HRA process (screening) considered the likely significant effects at the following European sites within the influence the plan:
- Medway Estuary & Marshes SPA/Ramsar
 - North Downs Woodlands SAC
 - Peters Pit SAC
 - Queendown Warren SAC
 - Thames Estuary & Marshes SPA/Ramsar
 - The Swale SPA/Ramsar
- 0.3 The screening concluded that the potential effects of the Plan on the European sites was uncertain as a result of reduced air quality; reduced water levels and quality; increased disturbance and habitat fragmentation and loss. Based on the precautionary approach these issues were progressed through to the Appropriate Assessment (AA) stage to be considered in more detail.
- 0.4 The AA considered the potential for the Core Strategy (both alone and in combination) to have adverse effects on the integrity of identified European sites through reduced air quality and reduced water levels and quality. Based on the sensitivity of the European sites, as well as mitigation provided through Core Strategy Policies and recommendations made by the AA, it was assessed that the Core Strategy alone would not have adverse effects on the European sites through reduced air quality. However, given a lack of available evidence the AA was unable to conclude with certainty that the Core Strategy would not have adverse effects on the integrity of the identified European sites through reduced air quality (in combination) and reduced water levels and quality (both alone and in combination). To strengthen the mitigation already proposed in the Plan the AA recommended a number of policy safeguards to help provide effective plan level mitigation that will contribute to minimising the impacts of proposed development on air quality, water levels and water quality. These include:
- supporting the Kent and Medway Air Quality Network during the life of the plan;
 - monitoring of air quality at key locations within or close to the proposed strategic sites;

- supporting and seeking opportunities for a wider approach to the management of Air Quality in North Kent in co-operation with surrounding Authorities;
- considering opportunities for the phasing and management of construction to minimise any impacts on air quality (especially from vehicular movement);
- ensuring that development proposals that pose material risk or harm to the quality and/or quantity of ground waters, surface waters, wetlands or coastal water systems either alone or in combination will not be permitted;
- requiring major proposals for new development to demonstrate that there are, or will be, adequate water supply and waste-water treatment facilities in place to serve the whole development;
- requiring Sustainable Drainage Systems to be incorporated into all new development; and
- requiring any proposal for Lodge Hill to be accompanied by a surface water strategy that considers the incorporation of Sustainable Drainage Systems.

0.5 The assessment also considered the potential for the Core Strategy to have adverse effects on the estuarine and coastal SPAs and Ramsar sites through habitat loss and fragmentation. The AA concluded that as the majority of development is being directed on previously developed land and the Lodge Hill area does not contain any suitable supporting habitat for designated bird species the Core Strategy will not have adverse effects on European site integrity (either alone or in combination) through habitat fragmentation and loss, provided the recommendations of the AA are incorporated in to the Plan. These include:

- incorporating wording to ensure that supporting habitats are protected, maintained and enhanced and that the Council does not permit development that could lead to the loss or fragmentation of these habitats unless it can be demonstrated that appropriate mitigation is available;
- requiring the HRA undertaken for the Allocations and Development Management DPD to include consideration of the potential impacts of waste and minerals allocations; and
- ensuring that any future employment development at the Isle of Grain employment site and the Kingsnorth commercial park should remain within the existing boundaries of the employment areas, unless it can be shown that there will be no loss of designated and/or supporting habitats.

0.6 The AA then considered the potential for the Core Strategy to have adverse effects on the integrity of North Downs Woodlands SAC; Thames Estuary & Marshes SPA/Ramsar; Medway Estuary & Marshes SPA/Ramsar and The Swale SPA/Ramsar through disturbance. The assessment concluded that the Core Strategy would not have adverse effects on the integrity of North Downs Woodlands SAC through

disturbance given the location of proposed development, management of the site, availability of alternative areas for recreation and mitigation provided by Core Strategy Policies.

- 0.7 The findings of the first phase of the NKEPG bird disturbance work suggests that there may be a correlation between recreational disturbance and bird decline along the North Kent coast and that recreational visitors tend to be from within the local area. This is significant given the level of development proposed in the Core Strategy, particularly the development of 5,000 new homes at Lodge Hill (Policy CS33), which is within 2 km of the Thames Estuary & Marshes SPA/Ramsar and the Medway Estuary & Marshes SPA/Ramsar. The AA concluded that until future phases of the NKEPG work have been completed - further surveys and predictive modeling - it is not possible to quantify the contribution that planned growth in Medway and surrounding areas may have on bird populations at the Medway Estuary & Marshes SPA/Ramsar, Thames Estuary & Marshes SPA/Ramsar and The Swale SPA/Ramsar. As a result the assessment could not conclude with certainty that the Core Strategy will not have adverse effects on the integrity of the SPAs and Ramsar sites through increased recreational activity. To strengthen the mitigation already proposed in the Plan the AA recommended the following:
- policy wording to ensure that the findings of the bird disturbance studies are implemented and any proposed strategic avoidance and/or mitigation measures are adopted, as appropriate in all planning documents and in the assessment of planning application;
 - Requiring any proposal for Lodge Hill to incorporate suitable areas for dog walking;
 - requiring water taxis to remain within the urban waterfront and not travel further downstream than Lower Upnor; and
 - Cross-referencing particular policies (CS6, CS8, CS13 , CS21 & CS33) to ensure the protection of European designated sites.
- 0.8 Provided that the recommendations of the AA are incorporated, it is considered that the Core Strategy will contain effective strategic plan level mitigation to address the issues identified through the HRA process, as far as is possible within the remit of a planning document. The plan should, however be seen in conjunction with the need for wider measures (e.g. effective European site management and coordinated regional approaches to air quality). The findings of this plan level HRA do not obviate the need to undertake HRA for lower level, project scale/ implementation plans where there is potential for a significant effect on one or more European Sites. Accordingly, this AA should be used to inform any future assessment work. It should also be revisited in the light of any significant changes to the Core Strategy and/ or if any further information becomes available.
- 0.9 These findings are subject to consultation comments and advice from NE and wider stakeholders.

1.0 INTRODUCTION

- 1.1 This is the Habitats Regulations Assessment (HRA) Appropriate Assessment (AA) Report for the Medway Local Development Framework (LDF) Core Strategy. It has been prepared by Environmental Planning Consultants, Enfusion for Medway Council, and is the second formal stage of the HRA process for the Council's Core Strategy.
- 1.2 The screening stage determined that there was the potential for the Publication Draft Core Strategy (PDCS) to have likely significant effects at six European sites, and in line with the precautionary nature of HRA, that further AA would be required. Accordingly, an Appropriate Assessment was undertaken and this report documents the findings of that process.

Background

- 1.3 The HRA for the Core Strategy has been an ongoing and iterative process, undertaken alongside plan-making to inform the emerging Medway Core Strategy. Enfusion's involvement began in June 2011 with the preparation of an HRA Working Paper, which sought to provide a strategic HRA overview of the key issues arising from development proposed in the Pre-Publication Draft Core Strategy (PPDCS- published October 2010) and how these issues could affect particular European sites. The Paper recommended a number of early mitigation measures to help inform the development of the Publication Draft Core Strategy (PDCS- published August 2011).
- 1.4 Concurrently, work was being undertaken by Footprint Ecology on the first of a number of studies commissioned by the North Kent Environmental Planning Working Group¹ (NKEPG) to investigate the issues around bird decline in the three North Kent Special Protection Areas² (SPAs). As these findings would be important in informing the HRA work it was decided to delay the formal HRA process and instead proceed with the Working paper initially to explore the issues, followed by an HRA Screening Report to accompany the Publication Draft Core Strategy on Consultation in August 2011.
- 1.5 Whilst the HRA assessment process itself would be ongoing, it was agreed with Council Officers and discussed with the NKEPG that publishing of the full HRA report (incorporating the Stage 2; Appropriate Assessment) would be delayed until the findings of the Footprint Studies were made available later in 2011.

¹ The North Kent Environmental Planning Group was established in 2010 to facilitate closer working between Local Planning Authority planning policy teams, statutory bodies and NGOs in order to develop a common understanding and approach to the natural environment and biodiversity in North Kent. NKEPG comprises members from Dartford, Gravesham, Medway, and Swale councils, Kent Wildlife Trust, Natural England, Environment Agency, Greening the Gateway Kent and Medway, RSPB and Kent County Council.

² The Thames Estuary and Marshes SPA, Medway Estuary and Marshes SPA and The Swale SPA

Consultation

- 1.6 A meeting was held with members of the North Kent Environmental Planning Working Group (NKEPG) on 29th June 2011 to discuss the initial findings and recommendations of the Working Paper and the HRA process. The notes from this meeting were circulated to NKEPG members and can be found in **Appendix 4**.
- 1.7 The Working Paper, including the updated mitigation suggestions discussed at the 29th June meeting, was subsequently sent to NKEPG members for informal comments, along with draft proposed policy wording and supporting text for Policy CS6: Preservation and Enhancement of Natural Assets. Responses were received from NE, RSPB, the Kent Wildlife Trust and Greening the Gateway Kent and Medway. The findings of the Working Paper and the comments received from stakeholders then helped to inform the undertaking of the formal HRA process: Stage 1: HRA Screening and Stage 2: Appropriate Assessment, alongside the emerging findings of the bird decline studies commissioned by the NKEPG. Of particular note were concerns around bird decline and atmospheric pollution at the European sites, and policy CS6 was subsequently amended to address this.
- 1.8 The requirements for a formal HRA screening stage were met through the production of a separate Stage 1 HRA Screening Report. This was formally made available for public consultation alongside the Publication Draft Core Strategy in August 2011. The responses received helped to further inform the Stage 2 Appropriate Assessment. In particular, two further policies were screened in to the HRA process, and further consideration was to be given to the effects of recreational disturbance on the North Downs Woodlands SAC.
- 1.9 A draft HRA (AA) Report was forwarded to Council Officers and to members of the NKEPG, and a meeting was held on the 15th November 2011 to discuss the initial findings and recommendations. Further comments were received after the meeting which helped to inform this HRA. A table summarising the comments and how these have been addressed is provided in **Appendix 5**

Structure of the Report

- 1.10 Following this introductory section the document is organised into four further sections:
- **Section 2** summarises the requirement for HRA and the background to Medway's Core Strategy.
 - **Section 3** summarises the method and findings of the screening process.
 - **Section 4** details the method and findings of the AA.

- **Section 5** summarises the conclusions of the HRA and outlines consultation arrangements.

2.0 HABITATS REGULATIONS ASSESSMENT (HRA) & THE PLAN

Requirement for Habitats Regulations Assessment

- 2.1 The Conservation of Habitats and Species Regulations Regulations 2010 (as amended 2011) [the Habitats Regulations] requires that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the conservation objectives of any site designated for its nature conservation importance.
- 2.2 The Habitats Regulations transpose the requirements of the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna [the Habitats Directive] which aims to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive]. In addition, Government guidance also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process as required by the Regulations.
- 2.3 The process of HRA is based on the precautionary principle. Evidence should be presented to allow a determination of whether the impacts of a land-use plan, when considered in combination with the effects of other plans and projects against the conservation objectives of a European Site; would adversely affect the integrity of that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed.

Guidance and Good Practice

- 2.4 The application of HRA to Local Development Documents is an emerging field and has been informed by a number of key guidance and practice documents. Draft guidance for HRA 'Planning for the Protection of European Sites: Appropriate Assessment', was published by the Government (DCLG, 2006) and is based on the European Commission's (2001) guidance for the Appropriate Assessment of Plans. The DCLG guidance recommends three main stages to the HRA process:
 - **Stage 1:** Screening for Likely Significant Effect
 - **Stage 2:** Appropriate Assessment, Ascertaining Effects on Integrity
 - **Stage 3:** Mitigations Measures and Alternatives Assessment.

- 2.5 If alternative solutions or avoidance/ mitigation measures to remove adverse effects on site integrity cannot be delivered then current guidance recommends an additional stage to consider Imperative Reasons of Overriding Public Interest (IROPI) for why the plan should proceed. For the HRA of land use plans IROPI is only likely to be justified in a very limited set of circumstances and must be accompanied by agreed, deliverable compensation measures for the habitats and species affected. For this reason the IROPI stage is not detailed further in this report.
- 2.6 More recently Natural England has produced additional, detailed guidance on the HRA of Local Development Documents (Tyldesley, 2009) that complements the DCLG guidance, and builds on assessment experience and relevant court rulings. The guidance: sets out criteria to assist with the screening process; addresses the management of uncertainty in the assessment process; and importantly outlines that for the HRA of plans; '... what is expected is as rigorous an assessment as can reasonably be undertaken in accordance with the requirements of the Regulations ...'.
- 2.7 The approach taken for the HRA of the Core Strategy follows the method set out in formal guidance documents and has additionally been informed by recent good practice examples. The key stages of the HRA process overall, and the specific tasks undertaken for the first, Screening Stage as detailed in this report; are set out in **Table 1**.

Table 1: Habitats Regulations Assessment: Key Stages	
Stages	Habitats Regulations Assessment
Stage 1: Screening for Likely significant Effects	1. Identify European sites in and around the plan area.
	2. Examine the conservation objectives of each interest feature of the European site(s) potentially affected.
	3. Analyse the policy/ plan and the changes to environmental conditions that may occur as a result of the plan. Consider the extent of the effects on European sites (magnitude, duration, location) based on best available information.
	4. Examine other plans and programmes that could contribute (cumulatively) to identified impacts/ effects.
	5. Produce screening assessment based on evidence gathered and consult statutory nature conservation body on findings.
	6. If effects are judged likely or uncertainty exists – the precautionary principle applies. Proceed to Stage 2 .
Stage 2: Appropriate Assessment	1. Agree scope and method of Appropriate Assessment with statutory nature conservation body.
	2. Collate all relevant information and evaluate potential impacts on site(s) in light of conservation objectives.
Stage 3: Mitigation Measures and Alternatives Assessment	1. Consider how effect on integrity of site(s) could be avoided by changes to plan and the consideration of alternatives (e.g. an alternative policy/ spatial location). Develop mitigation measures (including timescale and mechanisms for delivery).
	2. Prepare HRA/ AA report and consult statutory body.
	3. Finalise HRA/AA report in line with statutory advice to accompany plan for wider consultation.

The Medway Core Strategy

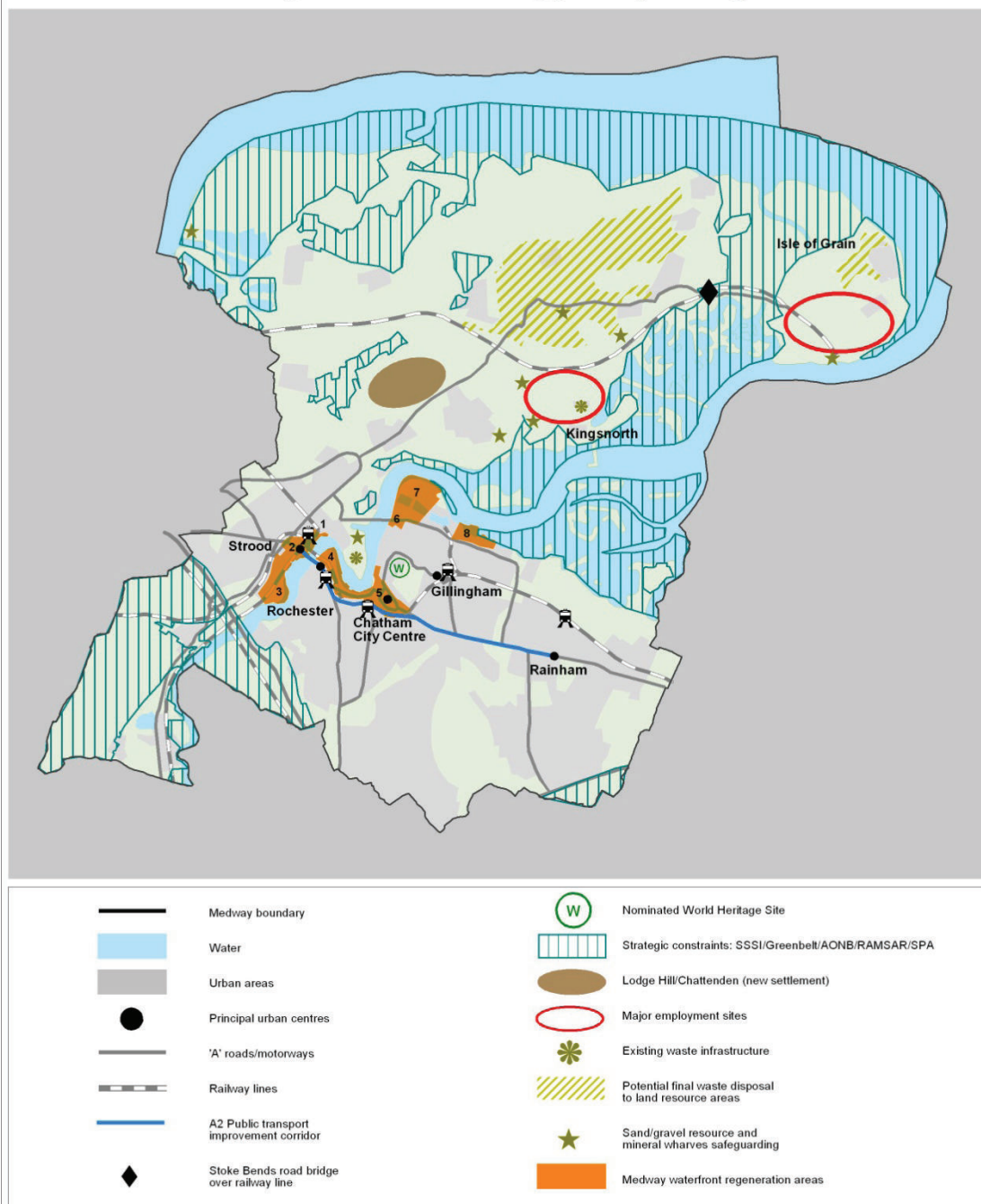
- 2.8 The Medway Core Strategy sets out how the Council sees Medway developing over the period up to 2028. When adopted, the Core Strategy will guide all major development decisions and investment plans. It sets out the overall vision and strategy for the area and will guide the development of further documents in Medway's Local Development Framework, including Allocations and Other Development Management Policies Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).
- 2.9 A Publication Draft Core Strategy (PDCS) was consulted upon in August 2011. Comments received on the PDCS were then considered in the preparation of the Submission Draft Core Strategy (SDCS). The Core Strategy sets out the context, options considered, vision and objectives and draft policies based around the following themes:
- Cross Cutting Themes;
 - Housing;
 - Economic Development;
 - Energy Waste and Minerals;
 - Transport and Movement;
 - The River Medway, and
 - Area policies.
- 2.10 The Core Strategy proposes to build approximately 17,930 new homes and 935,995 sq m of employment floorspace (accommodating up to 21,500 additional jobs) up to the year 2028. A key component of housing supply will be the large waterfront regeneration sites within the main urban area and a new settlement at Lodge Hill.

Overview of the Plan Area

- 2.11 **Figure 1** illustrates the main features of the Plan area including transport and infrastructure links and key environmental areas.

Figure 1: Core Strategy Key Diagram

Medway Core Strategy Key Diagram



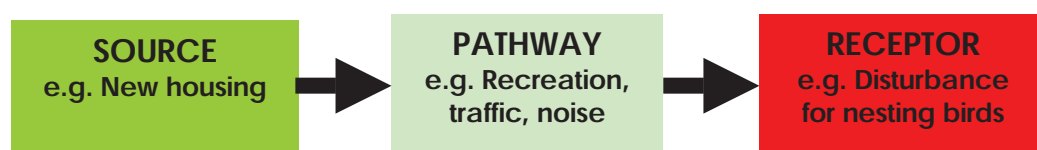
3.0 SCREENING STAGE METHOD & FINDINGS

- 3.1 As detailed in Section 2, **Table 1**, HRA typically involves a number of stages. This section of the report sets out the approach taken for Stage 1, HRA Screening for the Core Strategy and also outlines the findings. The aim of the screening stage is to assess in broad terms whether the policies and proposals set out in the plan are likely to have a significant effect on a European site(s), and whether in the light of available avoidance and mitigation measures, an AA is necessary.

Scope of HRA

- 3.2 Plans such as the Core Strategy can have spatial implications that extend beyond the intended plan boundaries. In particular, it is recognised that when considering the potential for effects on European sites, distance in itself is not a definitive guide to the likelihood or severity of an impact. Other factors such as inaccessibility/ remoteness, the prevailing wind direction, river flow direction, and ground water flow direction will all have a bearing on the relative distance at which an impact can occur. This means that a plan directing development some distance away from a European Site could still have effects on the site and therefore, needs to be considered as part of the HRA screening.
- 3.3 Therefore, rather than rely on distance alone, a more effective mechanism for considering the scope of the HRA is to use a 'source-pathway-receptor' model (see Figure 2) which focuses on whether there is a pathway by which impacts from the plan can affect the identified sensitivities/ vulnerabilities of European site(s)' environmental conditions.

Figure 2: Source, Pathway, Receptor Model



- 3.4 Using this approach the following sites that lie both within and outside the plan were scoped into the HRA Screening for the Core Strategy.

Table 2: European Sites within HRA Scope	
European Sites within Plan Area	Designation
Medway Estuary & Marshes	SPA/ Ramsar
North Downs Woodland	SAC
Thames Estuary & Marshes SPA/Ramsar	SPA/ Ramsar
European Sites outside Plan Area	Designation
Peters Pit SAC	SAC
Queendown Warren SAC	SAC
The Swale SPA/Ramsar	SPA/ Ramsar

Identification & Characterisation of European Sites

- 3.5 Summary site characterisations of the six sites scoped into the assessment are provided below in **Figure 3**. More detailed descriptions including conservation objectives and the specific sensitivities and vulnerabilities for each site are provided in **Appendix 1**.

Figure 3: European Site Characterisations

Medway Estuary & Marshes SPA/Ramsar

The Medway Estuary feeds into and lies on the south side of the outer Thames Estuary in Kent. It forms a single tidal system with the Swale and joins the Thames Estuary between the Isle of Grain and Sheerness. It has a complex arrangement of tidal channels, which drain around large islands of saltmarsh and peninsulas of grazing marsh. The mud-flats are rich in invertebrates and also support beds of *Enteromorpha* and some Eelgrass *Zostera* spp. Small shell beaches occur, particularly in the outer part of the estuary. Grazing marshes are present inside the sea walls around the estuary. The complex and diverse mixes of coastal habitats support important numbers of waterbirds throughout the year. In summer, the estuary supports breeding waders and terns, whilst in winter it holds important numbers of geese, ducks, grebes and waders. The site is also of importance during spring and autumn migration periods, especially for waders.

North Downs Woodland SAC

This site consists of mature beech forests (*Asperulo-Fagetum*) and also yew (*Taxus baccata*) woods on steep slopes, with scrub and small areas of unimproved grassland on thin chalk soils. The stands lie within a mosaic of scrub and other woodland types and are the most easterly of the beech woodland sites selected. Where the shade is less dense dog's mercury *Mercurialis perennis* predominates in the ground flora.

Peters Pit SAC

Peter's Pit is an old chalk quarry situated in the North Downs in north Kent, with large ponds situated amongst grassland, scrub and woodland. The ponds have widely fluctuating water levels and large great crested newt (*Triturus cristatus*) populations have been recorded breeding here.

Queendown Warren SAC

Queendown Warren consists of grassland (*Bromus erectus*) and contains an important assemblage of rare and scarce species, including early spider-orchid (*Ophrys sphegodes*), burnt orchid (*Orchis ustulata*) and man orchid (*Aceras anthropophorum*).

Thames Estuary & Marshes SPA/Ramsar

The Thames Estuary and Marshes SPA is located on the south side of the Thames Estuary. The marshes extend for about 15 km along the south side of

the estuary and also include intertidal areas on the north side of the estuary. To the south of the river, much of the area is brackish grazing marsh, although some of this has been converted to arable use. At Cliffe, there are flooded clay and chalk pits, some of which have been infilled with dredgings. Outside the sea wall, there is a small extent of saltmarsh and broad intertidal mud-flats. The estuary and adjacent grazing marsh areas support an important assemblage of wintering waterbirds including grebes, geese, ducks and waders. The site is also important in spring and autumn migration periods.

The Swale SPA/Ramsar

The Swale is located on the south side of the outer part of the Thames Estuary. The Swale is an estuarine area that separates the Isle of Sheppey from the Kent mainland. To the west it adjoins the Medway Estuary. It is a complex of brackish and freshwater, floodplain grazing marsh with ditches, and intertidal saltmarshes and mud-flats. The intertidal flats are extensive, especially in the east of the site, and support a dense invertebrate fauna. These invertebrates, together with beds of algae and Eelgrass *Zostera* spp., are important food sources for waterbirds. Locally there are large Mussel (*Mytilus edulis*) beds formed on harder areas of substrate. The SPA contains the largest extent of grazing marsh in Kent (although much reduced from its former extent). There is much diversity both in the salinity of the dykes (which range from fresh to strongly brackish) and in the topography of the fields. The wide diversity of coastal habitats found on the Swale combine to support important numbers of waterbirds throughout the year. In summer, the site is of importance for Marsh Harrier (*Circus aeruginosus*), breeding waders and Mediterranean Gull (*Larus melanocephalus*). In spring and autumn migration periods, as well as during winter, the Swale supports very large numbers of geese, ducks and waders.

Effects of the Plan

- 3.6 The Core Strategy proposes the development of approximately 17,930 new homes and 935,995 sq m of employment floorspace up to 2028. Housing, employment and infrastructure development have the potential to generate a range of environmental impacts which can, (depending on their nature, magnitude, location and duration), have effects on European sites. A summary of the types of impacts and effects that can arise from these types of development is provided in **Figure 4**.

Figure 4: Housing, Employment and Infrastructure Development: Summary of Impacts and Effects on European Sites

Effects on European Sites	Impact Types
Habitat (& species) fragmentation and loss	■ Direct land take, removal of green/ connecting corridors/ supporting habitat, changes to sediment patterns (rivers and coastal locations) ■ Coastal squeeze ■ Introduction of invasive species (predation) ■ Disturbance

Figure 4: Housing, Employment and Infrastructure Development: Summary of Impacts and Effects on European Sites	
Effects on European Sites	Impact Types
Disturbance	- Increased recreational activity (population increase) - Noise and light pollution (from development and increased traffic)
Changes to hydrological regime/ water levels	- Increased abstraction levels (new housing) - Increased hard standing non-permeable surfaces/ accelerated run-off - Laying pipes/ cables (surface & ground) - Topography alteration
Changes to water quality	- Increase in run-off/ pollutants from non-permeable surfaces (roads, built areas) - Increased air pollution (eutrophication) (traffic, housing) - Increased volume of discharges (consented)
Changes in air quality	- Increased traffic movements, including from construction - Increased emissions from buildings

- 3.7 The first stage in the Screening process is to consider whether the policies and allocations proposed in the plan, have the potential to lead to likely significant effects³ (LSE), such as those identified in **Figure 4**, on the European sites scoped into the assessment. In order to do this the policies and allocations were screened and categorised according to their potential effects. The approach taken was in accordance with Natural England guidance which details four main categories (supported by more detailed sub categories) of potential effect, as summarised in Figure 5.

Figure 5: Categorising the Potential Effects of the Plan (Tyldesley, 2009)
Category A: elements of the plan/options that would have no negative effect on a European site at all.
Category B: elements of the plan/options that could have an effect, but the likelihood is there would be no significant negative effect on a European site either alone or in combination with other elements of the same plan, or other plans or projects.
Category C: elements of the plan/options that could or would be likely to have a significant effect alone and will require the plan to be subject to an appropriate assessment before the plan may be adopted.
Category D: elements of the plan/options that would be likely to have a significant effect in combination with other elements of the same plan, or other plans or projects and will require the plan to be subject to an appropriate assessment before the plan may be adopted.

³ An effect is considered to be significant when it could potentially undermine the conservation objectives of a European site, and is considered likely if it can't be excluded on the basis of objective information that it will occur.

- 3.8 Proposals falling with categories A and B are considered not to have an effect on a European site and can be eliminated from the assessment procedure. Proposals falling within category C and Category D require further analysis, including the consideration of in combination effects to determine whether they should be included in the next stage of the HRA process.

Publication Draft Core Strategy Policy Screening

- 3.9 **Appendix 3** details the results of the HRA screening process for the PDCS policies, the key findings are summarised below. Amendments made as a result of formal consultation responses received for the HRA Screening) are *highlighted in red text and italics*.

Effects of the plan - alone

- 3.10 The PDCS policies which were considered to potentially lead to significant effects alone on European sites are listed in **Table 3**.

Table 3: PDCS Policies with potential for likely significant effects alone	
PDCS policies screened in to the assessment process	Assessment Category
Policy CS1: Regenerating Medway	C
Policy CS4: Energy Efficiency and Renewable Energy	C
Policy CS13: Housing Provision and Distribution	C
Policy CS16: Gypsies, Travellers and Travelling Showpeople	C
Policy CS17: Economic Development	C
Policy CS18: Tourism	C
Policy CS21: Conventional Energy Generation	C
Policy CS22: Provision for Minerals	C
Policy CS23: Waste Management	C
Policy CS24: Transport and Movement	C
Policy CS25: The River Medway	C
Policy CS26: Strood	C
Policy CS27: Rochester	C
Policy CS28: Chatham	C
Policy CS29: Gillingham	C
Policy CS30: Rainham	C
Policy CS31: Hoo Peninsula and the Isle of Grain	C
Policy CS32: Medway Valley	C
Policy CS33: Lodge Hill	C

- 3.11 Policies CS1, CS4, CS16 and CS21 make provision for a type and/ or quantity of development but the effects are uncertain because the detailed location of the development won't be determined until the preparation of a later, more specific plan (the Allocations DPD). The consideration of options in the later plan will need to assess potential

effects on European sites, meanwhile a significant effect cannot be ruled out at this stage.

- 3.12 Policies CS13, CS17, CS18 and CS22 to CS33 make provision for a type and quantity of development in locations that have potential for indirect Likely Significant Effects on European sites alone. The potential impacts arising from proposed development and the nature and significance of effects on European sites requires further consideration.

Effects of the plan - in combination

- 3.13 Other plans, programmes and projects that are being prepared and/or implemented in the area have the potential to have significant effects on European sites. Effects from different plans may interact leading to a cumulative, significant effect overall for the area's biodiversity interests. It is a key requirement of the Habitats Regulations that effects identified through the plan screening are considered for their potential in combination effects. Guidance recommends that the in combination assessment is undertaken in a targeted way, to ensure that the assessment is most effective, by focusing on those plans most likely to interact with the plan under consideration.

- 3.14 The plans and projects listed below have formed the basis of the in combination test for this policy screening. This list is not exhaustive and represents the most relevant current plans (further details are provided in **Appendix 2**).

- Swale Borough Council Core Strategy
- Gravesham Borough Council Core Strategy
- Dartford Borough Council Core Strategy
- Maidstone Borough Council Core Strategy
- Tonbridge and Malling Borough Core Strategy
- Southern Water - Water Resource Management Plan
- South East Water - Water resource Management Plan
- Thames Estuary 2100 Plan (TE2100)
- Kent Local Transport Plan
- Kent County Council Minerals and Waste Core Strategy
- Isle of Grain to South Foreland Shoreline Management Plan
- Medway Estuary and Swale Shoreline Management Plan
- Medway Local Transport Plan 2011-2026
- London Gateway - Deep Sea Container Port

- 3.15 The Screening identified that the policies listed in **Table 4** make provision for a type and quantity of development that could potentially lead to significant effects on European sites when considered in combination with other plans and projects.

Table 4: : PDCS Policies with potential for likely significant effects in combination	
PDCS policies screened in to the assessment process	Assessment Category
<i>Policy CS5: Development and Flood Risk⁴</i>	D
<i>Policy CS8: Open Space, Green Grid and Public Realm</i>	D
Policy CS7: Countryside and Landscape	D
Policy CS11: Culture and Leisure	D
Policy CS13: Housing Provision and Distribution	D
Policy CS17: Economic Development	D
Policy CS18: Tourism	D
Policy CS19: Retail and Town Centres	D
Policy CS22: Provision for Minerals	D
Policy CS23: Waste Management	D
Policy CS24: Transport and Movement	D
Policy CS25: The River Medway	D
Policy CS26: Strood	D
Policy CS27: Rochester	D
Policy CS28: Chatham	D
Policy CS29: Gillingham	D
Policy CS30: Rainham	D
Policy CS31: Hoo Peninsula and the Isle of Grain	D
Policy CS32: Medway Valley	D
Policy CS33: Lodge Hill	D

Screening Assessment

- 3.16 HRA screening good practice combines both a **plan** and a **site** focus. The policy screening removes from consideration, those elements of the **plan** unlikely to have effects on European sites. The remaining plan elements (summarised above) can then be considered in more detail for their impacts on European sites. The **site** focus considers the impacts and potential effects identified through the policy screening, in the light of the environmental conditions necessary to maintain site integrity for the European sites scoped into the assessment (**Table 2**).
- 3.17 **Table 5** considers the impacts arising from the PDCS (policy screening) against the sensitivities and conservation objectives of the identified European sites (**Appendix 1**) to determine if there is the potential for likely significant effects.

⁴ Respondents to the HRA Screening Consultation requested that policies CS 5 and CS 8 be considered further in the Stage 2 Appropriate Assessment; both policies have now been screened-in for their potential to lead to alone and in-combination effects. Refer Appendix 5 for consultation responses.

Key		
Likely Significant Effect	✓	Further Appropriate Assessment required
No Likely Significant Effect	✗	No further Appropriate Assessment required as no pathways identified
Significant Effect Uncertain	?	Precautionary approach taken and further Appropriate Assessment required

Table 5: Screening Matrix				
European sites	Potential Likely Significant Effects			
	Habitat (& species) Fragmentation & Loss	Disturbance	Water Levels & Quality	Air Quality
Medway Estuary & Marshes SPA/Ramsar	?	✓	?	?
<i>North Downs Woodlands SAC⁵</i>	✗	?	?	?
Peters Pit SAC	✗	✗	?	?
Queendown Warren SAC	✗	✗	?	?
Thames Estuary & Marshes SPA/Ramsar	?	✓	?	?
The Swale SPA/Ramsar	?	✓	?	?

3.18 The screening assessed that given the location, size and sensitivity of the Peters Pit and Queendown Warren SACs in relation to the location of proposed development, the Core Strategy will not have likely significant effects (either alone or in combination) through disturbance and/or habitat fragmentation and loss.

3.19 Based on the emerging findings of the Stage 1 visitor and bird disturbance studies commissioned by the NKEPG, which indicate that

⁵ Disturbance was screened-out in the initial HRA Screening report for the North Downs Woodland SAC, however this was raised as an area of concern by respondents (refer to Appendix 5) and as a consequence, this site has now been screened into the Stage 2 Assessment for the potential for recreational disturbance.

there is a correlation between recreational disturbance and bird decline and that recreational visitors tend to be from within the local area - it is assessed that there is the potential for likely significant effects on Medway Estuary & Marshes SPA/Ramsar, Thames Estuary & Marshes Spa/Ramsar and The Swale SPA/Ramsar as a result of increased recreational activity. The effects of increased recreational activity on the integrity of the identified European sites are considered in more detail in the AA.

- 3.20 The screening assessment also identified uncertainty with regard to the potential for significant effects on European sites as a result of changes to air quality and water levels and quality. Based on the precautionary approach these issues are considered in more detail in the AA.

Screening Conclusions

- 3.21 The screening concluded that the policies proposed in the PDCS have the potential for likely significant effects (both alone and in combination) on the following European sites:

- Medway Estuary & Marshes SPA/Ramsar
- North Downs Woodlands SAC
- Peters Pit SAC
- Queendown Warren SAC
- Thames Estuary & Marshes SPA/Ramsar
- The Swale SPA/Ramsar

- 3.22 As a result a Stage 2 Appropriate Assessment has been undertaken to consider the effects associated with habitat fragmentation and loss, disturbance, water levels and quality and air quality on the identified European sites. This is presented in section 4 of this report.

4.0 APPROPRIATE ASSESSMENT STAGE METHOD AND FINDINGS

AA Method

- 4.1 Assessing the impacts of plans, policies and proposals against the European site conservation objectives is required by Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended 2011). Guidance recommends three main stages to the HRA process:
- **Stage 1:** Screening for Likely Significant Effect
 - **Stage 2:** Appropriate Assessment, Ascertaining Effects on Integrity
 - **Stage 3:** Mitigation Measures and Alternatives Assessment.
- 4.2 The AA is the second stage of the HRA process and the approach will follow the method set out in formal guidance documents. The specific tasks to be undertaken are set out in **Table 6**.

Table 6 Appropriate Assessment Stage: Key Tasks	
Task 1 Scoping and Additional Information Gathering	■ Gathering additional information on European sites ■ Gathering additional data on background environmental conditions ■ Further analysis of plans/ projects that have the potential to generate 'in-combination' effects
Task 2 Assessing the Impacts (in-combination) Appropriate Assessment	■ Examination of the policies and proposals identified during the screening phase and their likely significant effects on European sites ■ Consideration of whether effects are direct/ indirect/ cumulative ■ Consideration of whether other plans and programmes are likely to generate effects that have the potential to act cumulatively with those arising from the plan
Task 3 Developing Mitigation Measures (including initial avoidance)	■ If effects identified – either arising from the plan alone and/or 'in-combination' with other plans - consider initial opportunities to avoid (e.g. delete/ remove or amend policy from plan) ■ Develop mitigation measures – must be deliverable by the plan and have clear delivery/ monitoring responsibilities
Task 4 Findings & Recommendations	■ Conclude the assessment, explain key findings and analysis informing conclusions.
Task 5 Consultation	■ Undertaken further consultation with NE (assumes that consultation has also been an iterative process throughout the HRA/AA).

AA Scope

- 4.3 The HRA Screening found that there is potential for likely significant effects on European sites as a result of development proposed in the Core Strategy and surrounding areas. This AA takes forward the findings of the screening assessment to determine if there is the potential for the Core Strategy to have adverse effects on the integrity of the identified European sites.
- 4.4 The policy screening (**Appendix 3**), review of plans and programmes in combination (**Appendix 2**) and consultation with key stakeholders (**Appendix 5**) identified four main areas of impact arising that may have the potential for adverse effects when combined with the effects arising from other plans, programmes and projects on the integrity of the identified European sites: habitat fragmentation & loss, water resources & quality, disturbance and air quality. **Table 7** shows (shaded red) the European sites against the potential issues that will be investigated further below.

Table 7: AA Scope				
European sites	Potential Effects			
	Habitat (& species) Fragmentation & Loss	Disturbance	Water Levels & Quality	Air Quality
Medway Estuary & Marshes SPA/Ramsar				
North Downs Woodlands SAC				
Peters Pit SAC				
Queendown Warren SAC				
Thames Estuary & Marshes SPA/Ramsar				
The Swale SPA/Ramsar				

Air Quality

- 4.5 The screening assessment identified that there was the potential for likely significant effects at the following European sites through reduced air quality:
- Medway Estuary & Marshes SPA/Ramsar

- North Downs Woodlands SAC
- Peters Pit SAC
- Queendown Warren SAC
- Thames Estuary & Marshes SPA/Ramsar
- The Swale SPA/Ramsar

What are the issues arising from the plan?

- 4.6 The growth proposed in the Core Strategy will lead to increased atmospheric pollution (local and regional), which will predominantly arise from an increase in traffic associated with the projected population growth over the life of the plan. Embodied energy in construction materials and increased energy use from new housing and employment development will also contribute to increased atmospheric pollution through the emission of greenhouse gases. The construction of new development can also lead to direct effects on air quality (dust, equipment and vehicular emissions), although these are carefully regulated through development controls/ site management measures.

How might the European sites be affected?

- 4.7 Atmospheric pollution from traffic is most likely to affect the habitats which comprise the qualifying features of the identified European sites, although there is the potential for designated species to also be affected, as in most cases they rely upon the designated habitats. **Table 8** below, identifies the potential impacts of atmospheric pollution on the habitats present within the European sites considered in this AA.

Table 8: Impacts of Atmospheric Pollution on Habitats

European site[s]	Potential impacts of Atmospheric Pollution ⁶
Marine, Coastal and Halophytic⁷ Habitats⁸	
■ Medway Estuary & Marshes SPA/Ramsar ■ Thames Estuary & Marshes SPA/Ramsar ■ The Swale SPA/Ramsar	Air pollution affects coastal and marine habitats differently to other terrestrial and freshwater habitats, which are dealt with separately below. Eutrophication - Many coastal habitats are potentially sensitive to nitrogen deposition. Similarly, salt water ecosystems, such as estuarine habitats may be under the dual threat of nutrient inputs from river inputs and atmospheric deposition. Some coastal environments can be highly eutrophic (highly productive ecosystems, which are rich in plant nutrients) as a result of droppings from sea bird colonies. Ozone - As with other semi-natural ecosystems, coastal habitats can be sensitive to ozone concentrations. The effects are expected to parallel those for example grassland ecosystems. It should be noted, however, that the structure of the coastal atmospheric boundary layer permits a greater mixing down of ozone concentrations, so that the ozone exposure of coastal ecosystems is larger than for inland areas. This

⁶ APIS - Impacts by Ecosystem: <http://www.apis.ac.uk/>

⁷ Halophytic plants are plants that can tolerate salty conditions.

⁸ JNCC - Annex I Habitat Accounts:
http://www.jncc.gov.uk/ProtectedSites/SACselection/SAC_habitats.asp

European site[s]	Potential impacts of Atmospheric Pollution ⁶
	additional stress will encourage the development of ozone tolerant ecotypes. As these are expected to have different competitive abilities, the community species composition may gradually change. Impacts of ozone on marine ecosystems are not expected, since the ozone is rapidly destroyed following contact with the sea surface.
Freshwater Habitats⁹	
Peters Pit SAC	There are five pollutant groups that could affect the quality of freshwater habitats: nutrients, acid deposition, heavy metals, POPs and radioactive particles. Eutrophication - nutrients, specifically phosphorus and nitrogen, are responsible for the eutrophication of rivers and lakes. There are signs of eutrophication in rivers, mainly of lower oxygen concentrations and increased macrophyte growth. The response of lakes to increased phosphorus concentrations is quite well understood and, in general, there is increased growth and change of species of phytoplankton, zooplankton, sediment-dwelling invertebrates, fish and macrophytes and lower oxygen concentrations, especially in the deeper parts of lakes. Acid Deposition - onto freshwaters (and catchments) can lead to acidification. The management and regulation of the acidification of freshwater is well developed in the United Kingdom. The biological groups affected by freshwater acidification are fish (mainly brown trout), invertebrates (mayfly and caddis larvae) and macrophytes (aquatic plants). Deposition of heavy metals and Persistent Organic Pollutants (POPs) - onto lakes occurs, even in rural and remote areas, but the ecological effects of this are not known. If any biological group are affected, they are likely to be fish (and fish-eating birds) and sediment-dwelling organisms.
Forests¹⁰	
North Downs Woodlands SAC	Nitrogen Deposition - Woodlands and forests scavenge air pollutants effectively, with the result that inputs of nitrogen deposition to woodlands are generally larger than for other habitat types. There has been a long-running debate regarding the extent to which actual "forest decline" occurs as a result of nitrogen deposition. What is clear is that the most sensitive elements are actually the woodland ground flora and epiphyte communities, which are particularly relevant in defining conservation status. Changes in forest ground flora have been clearly documented as a result of enhanced Nitrogen deposition near farms and are also expected to occur in regions with high wet deposition of ammonium and nitrate. Acid Deposition - Deposition of acidifying air pollutants is primarily seen as affecting the soils of woodland habitats, where effective inputs of sulphuric and nitric acids lead to leaching of the soil. The resulting soil acidification can lead to mobilisation of naturally occurring aluminium in the soil, which may have toxic effects on plant roots, leading to problems of tree health. Acidification also has the potential to reduce tree growth. Ozone - The impacts of ozone on forests are predicted to be widespread in the UK, due to the exceedance of the critical level for forests. The expected impacts include reduction in growth, as well as possibly changes in ground flora and epiphyte species composition. The latter is an area where there is a serious gap in information. Heavy Metals - Heavy metals (especially lead, cadmium, copper,

⁹ Ibid.

¹⁰ Ibid.

European site[s]	Potential impacts of Atmospheric Pollution ⁶
	mercury and zinc) can, at high concentrations, have toxic effects on plants. Symptoms include reduced root growth, and inhibition of various physiological processes including transpiration, respiration and photosynthesis. However large variations in inter-species sensitivity and bioavailability heavy metals must be taken into account when assessing possible effects. Heavy metals can accumulate over a long period in the organic layer and top soil leading to contamination of soil organisms, especially those that play a role in the formation of the soil. Furthermore, acidification of soils cause the mobilisation of these accumulations in the soil where they can be taken up by plant and animal species of the forest ecosystems.
Raised Bogs and Mires and Fens¹¹	
■ Medway Estuary & Marshes SPA/Ramsar ■ Thames Estuary & Marshes SPA/Ramsar ■ The Swale SPA/Ramsar	Bog habitats divide into two types: raised bogs and blanket bogs These ecosystems - often described as 'ombrotrophic' (rain-fed) mires - are especially sensitive to nitrogen air pollutants, and may be sensitive to ozone. Wetlands habitats divide into alkaline fens, reedbeds and grazing marsh. These habitats experience rather different sensitivity to nitrogen air pollutants, although similar responses to ozone might be expected. Nitrogen Deposition: ■ Fen ecosystems - can be 'ombrotrophic' (rain-fed) and are therefore especially sensitive to nitrogen deposition, as they derive all their nutrients from the atmosphere. Excess nitrogen leads to preferential growth of grass and tree species at the expense of the forming species. Coupled to these changes, the presence of less dominant associated herbs, bryophytes and lichens may change accordingly. ■ Bogs are highly sensitive to nitrogen deposition, as they derive all their nutrients from the atmosphere. Excess nitrogen leads to preferential growth of grass and tree species at the expense of the bog forming Sphagnum mosses, this can have a substantial impact on the development of bog systems. Coupled to these changes, the presence of less dominant associated herbs, bryophytes and lichens may change accordingly. By contrast, grazing marshes may be less sensitive to atmospheric deposition, although there is much less information regarding the impacts on this habitat type. The most concern in such systems is often the species composition adjacent to ditches, and this may be differently sensitive to the main sward. Ozone - the impact of ozone on habitats is generally mediated through a primary impact on plants, either directly in the case of mosses and lichens or indirectly for higher plants. Ozone episodes often occur in periods with dry conditions, when plants will tend to close their stomata. Wetland habitats in the UK are less likely to experience water shortage; as a result, such habitats may be particularly prone to ozone impacts. Currently there is little available data on ozone impacts on wetlands. However, it is expected that responses will be similar to grassland ecosystems.
Natural and Semi-natural grassland formations¹²	
■ Queendown Warren SAC ■ Medway Estuary & Marshes SPA/Ramsar ■ North Downs Woodlands SAC	Ozone - Expected effects include the development of ozone tolerant sub-species, which may lead to altered competitive abilities between plants. Studies on both acid and calcareous grasslands showed an increased ageing in plants subject to higher levels of ozone. Species composition changes were also observed in some studies. Where they have been studied, lowland and upland hay meadows (neutral grassland types) have not been demonstrated to be sensitive to ozone. However,

¹¹ Ibid.

¹² Ibid.

European site[s]	Potential impacts of Atmospheric Pollution ⁶
- Thames Estuary & Marshes SPA/Ramsar - The Swale SPA/Ramsar	both lowland and upland acid grasslands are sensitive to ozone particularly at the community level. Studies on calcareous grasslands have shown a reduction in plant growth. Ozone also affects agricultural grassland. Nitrogen (N) deposition is of particular concern for semi-natural grasslands that are not fertilised. In these situations, plant species composition is adapted to nutrient-poor conditions, with low productivity. Enhanced nitrogen supply from atmospheric deposition tends to favour the growth of some grasses at the expense of other herbs, bryophytes and lichens, which may be of more conservation interest. Studies on acid grasslands across the UK and Europe, showed a decline in species richness caused mainly by increasing N deposition. Management regimes may obscure or modify some of the relationships between atmospheric deposition and habitat change. Intensive management can offset higher N inputs to a certain extent from high N inputs and by removal through grazing, mowing or harvesting. Acid deposition - Critical loads are estimated for the effects of acid deposition on to grasslands, depending on soil type. Most at risk are grasslands which are already moderately acidic, while base-rich calcareous grasslands are resistant to acid deposition, due to a high weathering potential. A particular concern is where small base-rich areas occur in otherwise acid grasslands, as it has been suggested that these, and the associated species communities, may be rather sensitive to acid inputs.

Which other plans/ projects could lead to in-combination effects?

- 4.8 The following plans and programmes have the potential to act in-combination with the Core Strategy as they propose development that will lead to cumulative increases in road based traffic over the life of the plan:

- Swale Borough Council Core Strategy
- Gravesham Borough Council Core Strategy
- Dartford Borough Council Core Strategy
- Maidstone Borough Council Core Strategy
- Tonbridge and Malling Borough Core Strategy
- Kent Local Transport Plan
- Kent County Council Minerals and Waste Core Strategy
- Medway Local Transport Plan 2011-2026
- London Gateway - Deep Sea Container Port

What is the current situation?

- 4.9 The Annual Report (2010) for the Kent and Medway Air Quality Monitoring Network identified that background nitrogen dioxide (NO₂) concentrations have remained relatively stable in Kent since the mid-2000's. In 2010 the general trend at the background monitoring sites across the survey area was an overall reduction in NO₂ concentrations. A number of monitoring sites showed a slight increase at the end of

2010 reflecting an increase in NO₂ concentration seen during the cold weather experienced across the UK in December. Some reductions were seen at roadside sites during 2010; however this is thought to have been influenced by a general reduction in concentrations across the region rather than any significant reduction in local emissions sources. In contrast, the roadside sites which recorded an increase in concentrations (Swale Ospringe Roadside 2, Tunbridge Wells A26 Roadside and Maidstone A229) are likely to have been significantly influenced by changes in local emissions.

- 4.10 A proportion of the particulate matter present in Kent is from non-local sources, most significantly London and mainland Europe. This results in relatively high background and rural concentrations of particulate matter (PM₁₀) across Kent. The non-local origins of this particulate matter makes it difficult to achieve a significant reduction in ambient concentrations at a local level. Monitoring data shows that the contribution of PM₁₀ from road traffic results in increased concentrations at the roadside sites (e.g. Dover Centre, Tunbridge Wells A26, Maidstone A229, Ashford and Chatham). The Annual report identified that the PM₁₀ concentrations at the automatic monitoring sites remained relatively constant over the period 1998 to 2007. Between 2008 and 2010 there was some variation in the rolling annual mean concentration however there is a general downward trend in concentrations at almost all of the monitoring sites. At a local level, nitrogen dioxide (NO₂) is the only pollutant that exceeds air quality objectives within Medway and these exceedences are contained in the three declared Air Quality Management Areas (AQMAs) in Pier Road (Gillingham), High Street (Rainham) and Central Medway.
- 4.11 Information on atmospheric pollution at the European sites is currently limited. The Air Pollution Information System (APIS) provides critical loads for acidity and nitrogen for each designated feature within every SAC and SPA in the UK, however this information is based on predictivemodeling rather than from real monitoring data taken at the sites themselves. The different environmental conditions at each European site mean that the sensitivity of qualifying features to atmospheric pollution can vary between European sites, therefore this information is of limited use to the assessment.
- 4.12 The APIS 'Site Relevant Critical Loads' tool identifies that the critical load levels for nitrogen and acidity are not being exceeded at Queendown Warren SAC. No information is available for Peter's Pit SAC as APIS has not set critical load levels for freshwater habitats, however SSSI information indicates that the freshwater habitats are sensitive to both nitrogen and acid deposition. For the North Downs Woodlands SAC the critical load levels for nitrogen are being exceeded for the two woodland qualifying features but not for the grassland qualifying feature, whereas acidity critical loads are not being exceeding for any of these qualifying features.

- 4.13 Estuarine habitats are generally not considered to be particularly sensitive to air pollution effects given that they already receive high nitrogen loads in water. However, as previously stated the sensitivity of qualifying features is often determined by local environmental conditions. APIS provides information on the estimated level of deposition at broad supporting habitats used by the bird species designated as part of the SPAs being considered in this AA. It identifies that critical loads for nitrogen are being exceeded at only one of the supporting habitats (supralittoral sediment - acidic type). The remainder of the broad supporting habitats are either identified as not being sensitive to nitrogen or acid deposition or that critical loads are not being exceeded.

Is there potential for adverse effects on the integrity of European sites?

- 4.14 Levels of primary pollutants emitted directly into the atmosphere, tend to be highest around their sources; these are usually located in urban and industrial areas. Motor vehicles are a major source of primary pollution throughout the UK, in particular, traffic is an important source of carbon monoxide, nitrogen dioxide and volatile hydrocarbons (VOCs) such as benzene and 1,3-butadiene and primary particles (PM₁₀). Concentrations of all these pollutants are therefore usually highest in built-up urban areas.
- 4.15 Currently the only pollutant that is exceeding air quality objectives in Medway is nitrogen oxide (NO_x), the impacts of which are most relevant close to source. Therefore, the contribution of NO_x beyond the specific areas where development and related infrastructure is located is likely to be negligible. The most acute impacts of NO_x take place close to where they are emitted (generally within 200m of the roadside¹³) but these gases also have the potential to contribute to background pollution levels. Incineration can also contribute to levels of NO_x - Policy CS21 supports proposals for additional power generation and energy storage capacity on the Hoo Peninsula and the Isle of Grain.
- 4.16 European sites in close proximity (within 200m) to a major road (Motorway or A road) that are likely to see a significant increase in traffic as a result of development proposed in the Core Strategy and surrounding areas are North Downs Woodlands SAC (adjacent to the A249 and a portion lies within 200m of the A229), Medway Estuary & Marshes SPA/Ramsar (portion lies within 200m of the A249), Thames Estuary & Marshes SPA/Ramsar (portion lies within 200m of the A228) and The Swale SPA/Ramsar (portion lies within 200m of the A249 and A299). Peter's Pit SAC and Queendown Warren SAC are not within 200m of a major road.
- 4.17 The Core Strategy proposes the development of 17,930 new homes and 935,998 sq m of employment floorspace between 2006 and 2028.

¹³ Highways Agency (2007) Design Manual for Roads and Bridges: Volume 11, Section 3, Part 1.

This includes the development of a free-standing mixed-use settlement at Lodge Hill (providing 5,000 homes, 5,000 sq m GEA retail and at least 43,000 sq m GEA for business uses) and other waterfront regeneration sites along the River Medway. The increased population as a result of the development will inevitably lead to an increase in traffic and therefore atmospheric pollution in Medway.

- 4.18 Determining the significance of this impact in relation to the integrity of European sites is extremely complex. The sensitivity of European sites to atmospheric pollutants is dependent on a range of factors including the types of habitat present and the environmental conditions at each site. This means the sensitivity of each European site is different, even if they have the same designated features. Determining the critical loads for sites (habitats) and assessing the effect of atmospheric pollution is most appropriately carried out at a site specific level. The information available on APIS indicates that a number of qualifying features are sensitive to atmospheric pollution and that critical loads in certain areas are possibly being exceeded. Whilst this may be the case, the site specific information provided by JNCC and Natural England for the European sites scoped into this HRA does not indicate that atmospheric pollution is currently having adverse effects on the qualifying features of any of the sites.
- 4.19 Estuarine sites: The type of air pollution that marine and coastal habitats are most sensitive to is nitrogen deposition (atmospheric and river inputs). The North Kent estuarine ecosystem already receives high nitrogen inputs; and this, coupled with the fact that emissions are highest close to source (and the majority of development proposed within the Core Strategy is more than 200m from an Estuarine site) means that the PDCS is considered unlikely to have any adverse effects on the integrity of the estuarine European sites.
- 4.20 Terrestrial and freshwater sites: For the terrestrial European sites it is also unlikely that the Core Strategy alone will have adverse effects on site integrity as a result of increased atmospheric pollution. Only one of the terrestrial/freshwater sites (North Downs Woodlands SAC) is within 200m of a road that has the potential to see an increase in traffic as a result of proposed development. Less than 3.5 ha out of a total 287.58 ha (1.2 per cent) of designated habitat is within 200m of a major road and the SSSI units (Unit 15 & 26 of the Wouldham to Detling Escarpment SSSI) that make up the 3.5 ha are assessed by NE as being in a favourable condition¹⁴. Given that such a small proportion of the SAC is within 200m of any major roads (A229 and A249) and available information on the site indicates that site level management of the qualifying features, such as grazing is the most important factor in maintaining site integrity, it is unlikely that the development proposed in the Core Strategy alone will have adverse effects on the integrity of the SAC through increased atmospheric pollution.

¹⁴ Natural England: Sites of Special Scientific Interest - Wouldham to Detling Escarpment SSSI Information. Available online:
http://www.sssi.naturalengland.org.uk/Special/sssi/sssi_details.cfm?sssi_id=1001339

- 4.21 Whilst effects from the plan alone are considered unlikely, it is clear that the development proposed in the Core Strategy will contribute to background pollution levels in combination with other plans, programmes and projects. There is uncertainty however with regard to the significance of this in combination impact on the European sites. The Core Strategy alone cannot be expected to mitigate for the in combination effects of increased background pollution on the European sites. To effectively address the issue of air quality across the wider North Kent area, and in particular, the effects on European designated sites, a strategic regional approach to air quality management is required.

What existing mitigations are provided in the Core Strategy?

- 4.22 At a strategic level Medway Council has sought to ensure that Core Strategy policies address identified issues - in relation to potential adverse impacts on air quality - and has put the following robust policy measures in place to provide mitigation:

- The Core Strategy (in particular Policy CS24: Transport and Movement) seeks to minimise congestion through the operation of urban traffic management and control systems as well as improvements to junctions in congestion/ air quality hotspots. It also seeks to reduce reliance on the private vehicle through a quality bus network and improvements to walking and cycling networks.
- All significant developments are required to be subject to an agreed transport assessment, which includes an assessment of the potential modal shift away from private car use.
- Policy CS3 (Mitigation and Adaptation to Climate Change) will help to minimise increased emissions from buildings through the requirement for residential development to achieve Code for Sustainable Homes Level 3 until the end of 2013, Code Level 4 between 2014 and 2016 and then Code Level 5 from the beginning of 2016. Commercial buildings (over 1,000 sq m) are required to meet BREEAM 'very good' standard until 2016 and thereafter BREEAM 'excellent'.

Further recommendations for avoidance and mitigation

- 4.23 Along with the strategic policy mitigation already in place the following recommendations should be incorporated into the Core Strategy to address identified issues with regard to air quality:
- It is recommended that the supporting text of Policy CS3 (Mitigation and Adaptation to Climate Change) should include wording to ensure that the Council will support the Kent and Medway Air Quality Network during the life of the plan.
 - It is recommended that the Council requires the monitoring of air quality at key locations within or close to the proposed strategic sites to determine if air quality is worsening as a result of new

development (this is also a recommendation of the Sustainability Appraisal). This information can then inform the Council and County Council's wider approach to air quality management.

- The Council should support and seek opportunities for a wider approach to the management of Air Quality in North Kent in co-operation with surrounding Authorities.
 - In preparing the Allocations and Other Development Management Policies DPD, the Council should consider opportunities for the phasing and management of construction to minimise any impacts on air quality (especially from vehicular movement).
- 4.24 The policy mitigation outlined above is effective plan level mitigation and will contribute to minimising the impacts of proposed development on air quality. Supporting the Kent and Medway Air Quality Network during the life of the plan will allow the Council to determine if the policy mitigation contained within the plan is working effectively.

Disturbance

- 4.25 The screening assessment identified that there was the potential for likely significant effects at the following European sites due to disturbance:

- Medway Estuary & Marshes SPA/Ramsar
- North Downs Woodlands SAC
- Thames Estuary & Marshes SPA/Ramsar
- The Swale SPA/Ramsar

What are the issues arising from the plan?

- 4.26 Development proposed in the Core Strategy will increase the residential population in Medway and therefore levels of recreational activity (both water and land-based) on and around the designated sites. It also has the potential to result in increased levels of noise and light pollution through building construction /operation and activities (e.g. minerals and waste workings) through increased vehicular traffic and plant operation.

How might the European sites be affected?

- 4.27 Increased recreational activity at European sites has the potential to cause disturbance to designated habitats and species through a variety of different pathways. This could include physical disturbance through trampling of habitats as a result of increased recreation or non-physical disturbance to species through noise and light pollution as a result of increased traffic or development itself.

Which other plans/ projects could lead to in-combination effects?

- 4.28 The following plans and programmes have the potential to act in-combination with the Core Strategy as they propose development that will lead to cumulative increases in recreational activity and noise and light pollution over the life of the plan:

- Swale Borough Council Core Strategy
- Gravesham Borough Council Core Strategy
- Dartford Borough Council Core Strategy
- Maidstone Borough Council Core Strategy
- Tonbridge and Malling Borough Core Strategy
- Thames Estuary 2100 Plan (TE2100)
- Kent Local Transport Plan
- Kent County Council Minerals and Waste Core Strategy
- Isle of Grain to South Foreland Shoreline Management Plan
- Medway Estuary and Swale Shoreline Management Plan
- Medway Local Transport Plan 2011-2026
- London Gateway - Deep Sea Container Port

What is the current situation?

- 4.29 There have been reported declines in the numbers of important bird species in the three north Kent Special Protection Areas (Thames Estuary and Marshes SPA, Medway Estuary and Marshes SPA and The Swale SPA), in particular Medway Estuary and Marshes SPA. Studies have been commissioned by the NKEPG to identify the causes of these declines, which may include recreational disturbance. The first phase of this work has been completed in the form of a visitor survey and bird disturbance study. The studies are focussed along the stretch of shoreline that encompasses the Medway Estuary & Marshes SPA/Ramsar, Thames Estuary & Marshes SPA/Ramsar and The Swale SPA/Ramsar.
- 4.30 The visitor surveys were conducted in February and March 2011 to assess the level and type of visitor use at 21 locations across the shoreline. A total of 1,398 visitors were recorded entering and leaving the survey locations and 542 visitor groups were interviewed. Key findings from the survey include:
- The main recreational activities being undertaken were dog walking (62%) and walking without dogs (23%), which accounted for 85% of the main activity responses.
 - Across all locations visits were typically short with 57% of them lasting less than an hour.
 - Two main modes of transport were used to access the locations with 63% of visitors arriving by car and 34% by foot. 50% of visitors who arrived by foot lived within 0.9km and 90% lived within 2.7km while 50% of visitors who arrived by car lived within 4.2km and 90% lived within 24.6km.

- The length of each visitor route varied depending on the activity they undertook and the location visited.
- It was also noted that 23% of visitor routes strayed from the path network and crossed onto the intertidal areas.

4.31 The bird disturbance study surveyed 22 locations, which were visited repeatedly between December 2010 - February 2011. The survey work comprised of bird counts and counts of people with a record of the recreational activity they undertook. Findings include:

- The study recorded a wide range of bird species (34 in total) with oystercatcher, dunlin, curlew and redshank present at every survey location.
- The highest counts of waders and wildfowl were recorded on the outer Swale.
- There were 1,879 observations of visitors recorded in the vicinity of the bird survey locations accounting for 2,609 people.
- Visitors were recorded undertaking a wide range of shore and water based activities with dog walking (46% of groups) and walking without dogs (24% of groups) being the most common activities recorded.

4.32 Of the 34 recorded bird species 19 are designated as protected species under the Birds Directive and/or Ramsar Convention. The European protected bird species recorded were as follows:

■ Avocet	■ Redshank
■ Bar-tailed Godwit	■ Ringed Plover
■ Black-tailed Godwit	■ Turnstone
■ Curlew	■ Dark-bellied Brent Goose
■ Dunlin	■ Pintail
■ Golden Plover	■ Shelduck
■ Greenshank	■ Shoveler
■ Grey Plover	■ Teal
■ Knot	■ Widgeon
■ Oystercatcher	

4.33 The study also recorded the behavioural response of birds to people, as well as the distance between the birds and people, which allowed it to determine if the behavioural response of birds to people differs with distance. As the activity of each person was noted the type of response exhibited by the birds to people undertaking different activities was also recorded. Key findings included:

- Around one quarter (26%) of species-specific observations resulted in birds being 'disturbed' - i.e. becoming alert, walking/swimming away, undertaking a short flight (<50m) or a major flight (>50m).
- Major flight occurred in 14% of the species specific observations and around one fifth (18%) of disturbance events caused a major flight.

- Walking dogs that were off their leads was the activity responsible for the majority of observed species-specific major flight events - with a total of 189 major flight observations attributed to this activity - which is nearly half (46%) of all the major flight events.
 - 55% of species specific observations of major flight were attributed to dog walkers (leads on and off).
- 4.34 The two locations with the highest proportion of major flight observations were locations 16 (Stoke Ouze A228 layby) and 7 (Harty), where 57 and 41% of observations resulted in major flight. Both these locations were comparatively 'quiet', in that levels of recreational use here were actually low. The study noted that there was a lower proportion of major flights observed at the busier sites, in other words at locations with lots of people visiting, there were fewer major flights per person counted. The birds typically tended to respond (whether becoming alert, walking, short flight or a major flight) to potential disturbance events at around 50m.
- 4.35 The study identified that the following factors were significant in predicting whether major flight would take place or not:
- distance (the shorter the distance, the more likely major flight);
 - species;
 - flock size (larger flocks less likely to take flight);
 - number of dogs off leads (more dogs and major flight more likely);
 - dog present or not (major flight more likely if dogs present);
 - 'zone' in which activity occurred (major flight more likely with activities on the intertidal or on the water); and
 - state of tide (major flight more likely at high tide).
- 4.36 The interactions between distance and tide were highlighted by the study. It suggested that birds respond differently in terms of the distance at which they respond according to the state of the tide. The results of the visitor bird disturbance work will eventually be used in predictive models in later phases of the work to determine the extent to which disturbance currently impacts on the designated sites and their ability to support the important waterfowl populations.
- 4.37 There is currently no information available on the levels of recreational activity occurring at the North Downs Woodlands SAC.

Is there potential for adverse effects on the integrity of European sites?

- 4.38 Policies within the Core Strategy propose the development of 17,930 new homes and 935,998 sq m of employment floorspace between 2006 and 2028. This includes the development of a free-standing mixed-use settlement at Lodge Hill (providing 5,000 homes, 5,000 sq m GEA retail and at least 43,000 sq m GEA for business uses) and other waterfront regeneration sites along the River Medway. Other policies seek to increase access to coastal areas (Policy CS8) and improve the leisure use of the river (Policy CS18) as well as facilitate the introduction

of water bus/taxis services along the urban waterfront (Policies CS24 & CS25). Policy CS17: Economic Development also supports tourism in the area.

- 4.39 The findings of the NKEPG visitor and bird disturbance survey work suggests that there may be a correlation between recreational disturbance and bird decline and that recreational visitors tend to be from within the local area. This is significant given the level of development proposed in the Core Strategy, particularly the development of 5,000 new homes at Lodge Hill (Policy CS33), which is within 2 km of the Thames Estuary & Marshes SPA/Ramsar and the Medway Estuary & Marshes SPA/Ramsar. It is important to note that the bird disturbance study did not consider disturbance in relation to the distribution of prey or the consequences of disturbance in terms of population size. The distribution of birds within the designated sites is likely to be governed by a range of factors, in particular the abundance and distribution of their food.
- 4.40 There was no significant correlation between bird numbers (or densities) and the number of people present. However, there were no visits where high numbers of people were counted and high numbers of birds also occurred. The study suggests that birds are perhaps avoiding the busiest sites, but at the other sites other factors may be influencing distribution. Until the future phases of work have been completed – further surveys and predictive modeling - it is not possible to quantify the contribution that planned growth in Medway and surrounding areas may have on bird populations at the Medway Estuary & Marshes SPA/Ramsar, Thames Estuary & Marshes SPA/Ramsar and The Swale SPA/Ramsar. As a result there is uncertainty as to whether the CS will have adverse effects on the integrity of the European sites through increased recreational activity.
- 4.41 Given the unique recreational opportunities that the European sites provide and the level of development proposed around them, it is not likely that an individual authority alone could avoid, mitigate or compensate for adverse effects of increased disturbance on the integrity of the identified European sites if they should occur. However, at a strategic level, such as the Core Strategy, authorities should seek to ensure that policies recognise and address identified issues and put robust measures in place to provide mitigation. This might include policies that provide alternative recreational spaces or by contributions to strategic management approaches in collaboration with NE and other Local Authorities.
- 4.42 Policy mitigation and joint working at a strategic level can help to mitigate the impacts of recreational activity to a certain extent, however; the direct impacts of recreational activity are most appropriately addressed at the site level through co-operative measures.

- 4.43 Water-based recreation/travel: There are already a number of voluntary restrictions in place for particular recreational activities, such as for the use of personal water craft (e.g. jet-skis). Particular areas of the European sites are restricted for recreational use to minimise the level of disturbance on designated features. The Port Authority of London¹⁵ and the Kent Coastal Network¹⁶ identify restricted areas for personal water craft use and provide information on protected areas and rules that should be followed to minimise impacts of personal water craft use on the natural environment. These include:
- Only launch, moor and land your PWC from authorised launch sites and do not use saltmarsh or mudflats for these purposes.
 - Maintain distance from sensitive wildlife and habitats such as saltmarsh and exposed mudflats, particularly during wintering periods (September - March) when birds may be feeding or roosting.
 - Avoid shallow waters where your PWC may erode or disturb the seabed and submerged vegetation.
 - Do not harass marine mammals such as dolphins, or large flocks of birds. As a general rule, never go closer than 100m (200m if another boat is in the vicinity).
 - If wildlife is encountered, maintain a steady direction and a slow 'no wake' speed away from the wildlife.
 - Do not exceed 8 knots (10 mph) when within designated conservation areas and do not enter restricted areas (see map below).
 - Do not decant petrol or use chemical treatments in the water.
- 4.44 Co-operative measures such as the voluntary agreements outlined above have been shown to be highly effective in the management of recreation and tourism impacts on European sites¹⁷. These measures have been most successful when affected stakeholders have been invited to participate and contribute in the design of the management measures. For example, the Dutch Wadden Sea Natura 2000 site is a crucial habitat for many plants and animals and is the largest nature protection area in the Netherlands. The area attracts large amount of tourism and many water-based recreation and sports activities, especially sailors. Prior to 2003 restrictions were in place in relation to the mooring of boats, which were heavily criticised by the various water sports associations. To settle the conflict and minimise adverse effects on the site a voluntary code of conduct was developed between the nature administration and the various water sport associations, which permitted exceptions to the mooring restrictions produced prior to 2003. The underlying aim of this voluntary agreement is to motivate visitors to avoid any behaviour that may

¹⁵ Port Authority of London (Accessed 07/11/11)

http://www.pla.co.uk/display_fixedpage.cfm/id/2324

¹⁶ The Kent Coastal Network (2009) Riding Personal Water Craft in Kent:

http://www.dover.gov.uk/council_property/personal_water_craft.aspx

¹⁷ Proebstl, U. & Prutsch, A. (2010) Natura 2000 - Outdoor Recreation and Tourism; A guideline for the Application of the Habitats Directive and the Birds Directive. Bundesamt fuer Naturschutz, Bonn, Germany.

have negative impacts on biodiversity. The site is also monitored annually for possible negative impacts and the commonly agreed rules of behaviour are evaluated.

- 4.45 The introduction of water taxis (as proposed in Policies CS24 & 25) is unlikely to significantly affect the European sites as long as they remain within the urban waterfront and are a sufficient distance from the European sites themselves, as well as any suitable supporting habitat. It is recommended that the water taxis - if implemented - remain within the urban water front and travel no further downstream than Lower Upnor.
- 4.46 Monitoring: NE plays a key role in the collation of information to monitor the identified European sites and is responsible for assessing the condition of each feature within the sites. If monitoring carried out by NE on the Medway Estuary and Marshes SPA/Ramsar, Thames Estuary and Marshes SPA/Ramsar and The Swale SPA/Ramsar finds that the voluntary agreements and restrictions currently in place are not protecting the designated features then they should be re-evaluated and possibly replaced by stricter regulations. This should be done in co-operation with key stakeholders including the various sport associations and land owners. The development of co-operative measures should already be going on through the production of the management plans for the European sites. The fundamental purpose of the management plans is to ensure the sustainable use of the European sites. It provides the basis for site-specific monitoring and the goal is to either maintain the favourable condition of the site it is protecting, or to define the ideal desired condition and the required actions for achieving them. Representatives of all the various sports and tourism activities will be given the opportunity to participate in the management planning process, which can often provide innovative, practical and widely accepted solutions¹⁸.
- 4.47 For an individual strategic development such as Lodge Hill, there is the potential for proposals to incorporate suitable alternative areas for recreation. In this case areas that provide suitable alternatives for the recreational activity that is identified by the bird disturbance work as having the greatest impact, which is dog walking. Mitigation measures could include alternative areas for dog walking, such as a 'dog friendly park' that provides an area for dogs to be let off the lead. The requirement for project level HRA for this development will ensure that specific mitigation measures for addressing the potential impacts of recreational activity will be considered within any proposal for the site.
- 4.48 Consultation on the HRA has indicated that there is the potential for urbanisation impacts on the North Downs Woodlands SAC. In response to the Draft HRA (AA) Report NE stated that 'Natural England do not consider that current unauthorised activities and recreational disturbance is sufficient in the North Downs Woodlands SAC to cause

¹⁸ Ibid.

any of the units to be in unfavourable condition. Over recent years we have worked with landowners to reduce incidences. However, there are still areas that are impacted i.e. around Halling.

- 4.49 North Downs Woodlands is composed of two separate sections, the first of which contains part of the Halling To Trottiscliffe Escarpment SSSI. The second contains part of the Wouldham to Detling Escarpment SSSI. A small proportion of the SAC near Upper Halling falls within Medway's boundary. The majority of the SAC falls within the boundaries of Maidstone Borough Council and Tonbridge and Malling Borough Council, with a small proportion also within Gravesham Borough. The Core Strategy is making no proposals for significant development in the south of the plan area that do not already have planning permission. The majority of development proposed in the Core Strategy is over 5km from both sections of the SAC.
- 4.50 NE has assessed that the majority of the SSSI units that make up the SAC are either in a 'favourable' or 'unfavourable recovering' condition. Only one unit (unit 39 of the Halling To Trottiscliffe Escarpment SSSI) is identified as 'unfavourable no change' as a result of conifer plantations. There are also large areas of woodland in the surrounding areas which can serve as alternative green spaces for recreation. Given the relationship between the SAC boundary and wider SSSI boundary it's possible that the recreation and urbanisation activities - particularly with regard to the Halling to Trottiscliffe Escarpment SSSI Map 3 - are occurring on the wider SSSI areas rather than on the SAC itself.
- 4.51 Based on available evidence it is unlikely that development proposed in the Core Strategy will lead to a significant increase in the levels of recreational and urbanisation activities at the SAC, especially given the large alternative areas of woodland that are in close proximity to the designated areas. Given this and the mitigation provided by Core Strategy Policies (seeking for new development to provide open space and contribute to the formation of the green grid, and requiring developers to provide for new recreational facilities if the need arises), it is considered highly unlikely that the Core Strategy would have significant effects alone on the SAC through increased recreation and urbanisation. It is considered that based on available evidence, the residual effects of other plans and programmes (in particular the Gravesham, Maidstone and Tonbridge and Malling Core Strategies) will not make the potential in combination effects of the Core Strategy significant.

What existing mitigations are provided in the Core Strategy?

- 4.52 A number of measures have been included within the PDCS to minimise disturbance:
- Policy CS6 (Preservation and Enhancement of Natural Assets) seeks to protect and enhance international wildlife habitats and sites

through long term management. The policy also ensures that the Council will implement the findings of the bird population and visitor studies commissioned by the NKEPG and will ensure that any proposed strategic avoidance and/or mitigation measures are considered in all planning documents and in the assessment of planning applications. Development will not be permitted if it causes unacceptable harm to important habitats and species through increased noise or light pollution unless it can be demonstrated that measures can be taken to overcome any significant risk.

- Policy CS8 (Open Space, Green Grid and Public Realm) ensures that opportunities will be sought for new development to provide open space and contribute to the formation of the green grid. Where open space cannot be provided on-site, alternative equivalent provision of new open space or the enhancement of existing open space will be required off-site. Existing open space will be preserved and poor quality open space enhanced unless an improved provision can be made by new development. Major regeneration proposals will be required to provide recreational areas as part of new or enhanced urban spaces. The policy helps to ensure provision of Strategic Alternative Green Spaces, hence providing alternatives to recreating within European sites.
- Policy CS10 (Sport and Recreation) seeks to safeguard existing recreational facilities and extend them where appropriate.
- Policy CS35 (Developer Contribution) requires that where the need arises the Council will seek to enter into a legal agreement with the developer(s), to provide for new recreational facilities.

Further recommendations for avoidance and mitigation

- 4.53 Whilst Policy CS6 (Preservation and Enhancement of Natural Assets) is considered to afford good protection to habitat and species more generally, there is potential to strengthen the wording with specific regard to European sites. It is recommended that the following text is removed from Policy CS6:

The Council will implement the findings of the bird population and visitor studies commissioned by the North Kent Environmental Planning Group and will ensure that any proposed strategic avoidance and/or mitigation measures are adopted in all planning documents and in the assessment of planning applications.

- 4.54 It is recommended that the following text should then be inserted at the end of Policy CS6:

As part of its commitment to ensuring the ongoing protection of SACs, SPAs and Ramsar sites, the Council will:

- *implement the findings of the bird population and visitor studies commissioned by the North Kent Environmental Planning Group;*

- *ensure that any proposed strategic avoidance and/or mitigation measures are adopted, as appropriate in all planning documents and in the assessment of planning applications¹⁹;*
- *adopt a flexible approach that enables development plan documents to be reviewed in the light of emerging evidence; and*
- *deal with developments on a case by case basis - also taking into consideration the potential for in combination effects - based on best available evidence until the full results of the NKEPG studies are available- using a precautionary approach to require HRA where effects are uncertain.*

4.55 To address the identified issue of recreational disturbance on the designated bird species it is recommended that the following should be incorporated into the Core Strategy:

- It is recommended that Policy CS33 (Lodge Hill) should require any proposal for the site to incorporate suitable areas for dog walking. This should include if possible, a 'best practice' dog friendly park', which provides a suitable area for dogs to be let off the lead and that is of sufficient size and quality to deter owners from travelling to the European sites. This should be developed in consultation with local dog owners and trainers.

4.56 Any development proposal for Lodge Hill will be required to submit a project-level HRA to ascertain whether there are likely to be significant effects arising from the proposed development. This document will be based on the detailed development application for the site and will therefore be able to provide a further detailed assessment of this particular development. It is understood that this document is under preparation and it is recommended that the report be reviewed prior to this Core Strategy HRA report being finalised for adoption.

4.57 It is recommended that - if implemented - the water taxis should remain within the urban waterfront and not travel further downstream than Lower Upnor.

4.58 To address identified issues with regard to the potential for increased access (Policy CS8) to European sites:

- It is recommended that Policy CS8 (Open Space, Green Grid and Public Realm) should make reference to Policy CS6 and the protection of European designated sites to ensure that changes to the Green Infrastructure network and increased access to coastal areas has no adverse effect on European sites.
- It is recommended that Policies CS13 (Housing Provision and Distribution) and CS33 (Lodge Hill) cross refer to Policy CS8 (Open Space, Green Grid and Public Realm) to ensure that changes to

¹⁹ Sites with outline planning permission should be re-assessed at the reserved matters stage to take account of available evidence at the time.

the Green Infrastructure network and increased access to coastal areas has no adverse effect on European sites.

- 4.59 It is also recommended that Policy CS21 makes reference to Policy CS6 and the protection of European designated sites.

Habitat (& species) Fragmentation & Loss

- 4.60 The screening assessment identified that there was the potential for likely significant effects at the following European sites through habitat fragmentation and loss:

- Medway Estuary & Marshes SPA/Ramsar
- Thames Estuary & Marshes SPA/Ramsar
- The Swale SPA/Ramsar

What are the issues arising from the plan?

- 4.61 Development proposed in the Core Strategy and surrounding areas could lead to the loss and fragmentation of supporting habitats, i.e. those that lie outside the designated area but have an identified role to play in maintaining the overall integrity of the European sites. It is unlikely that development proposed in the Core Strategy will lead directly to the loss of designated habitat as policies within the plan divert development away from European sites and actively seek to protect habitats and species.

How might the European sites be affected?

- 4.62 The loss or reduced connectivity of supporting habitats can adversely affect the designated species that rely upon them.

Which other plans/ projects could lead to in-combination effects?

- 4.63 The following plans and programmes have the potential to act in-combination with the Core Strategy as they propose development that will lead to the cumulative increase of habitat fragmentation and loss:

- Swale Borough Council Core Strategy
- Gravesham Borough Council Core Strategy
- Dartford Borough Council Core Strategy
- Maidstone Borough Council Core Strategy
- Tonbridge and Malling Borough Core Strategy
- Thames Estuary 2100 Plan (TE2100)
- Kent Local Transport Plan
- Kent County Council Minerals and Waste Core Strategy
- Isle of Grain to South Foreland Shoreline Management Plan
- Medway Estuary and Swale Shoreline Management Plan

- Medway Local Transport Plan 2011-2026
- London Gateway - Deep Sea Container Port

What is the current situation?

- 4.64 The estuarine and coastal European sites in North Kent are under threat from the potential loss and fragmentation of supporting habitat. Development along the coast through increased housing/ industrial expansion in the area can result in coastal squeeze and the subsequent loss and fragmentation of habitat. Another cause is often the development of structures that seek to protect the land and/or infrastructure from erosion and sea defences to prevent erosion and/or flooding. These and other techniques effectively 'fix' the coastline, which is particularly important where it affects habitats and ecosystems that would normally move landward in response to erosive forces. Where there is a rise in sea level relative to the land a coastal squeeze takes place.

Is there potential for adverse effects on the integrity of European sites?

- 4.65 Development proposed in the Core Strategy is unlikely to lead to the direct loss of designated habitats. There is however, the potential for loss of supporting habitats in combination with other plans, programmes and projects through land take and coastal squeeze, which are important to the designated bird species.
- 4.66 Policy CS1 (Regenerating Medway) seeks to focus development on underused, derelict and previously developed land in the town centres and along the Medway Riverside. In line with this Policy (CS1) the Area Policies (Policies CS26 - 32) direct development along the River in a number of waterfront regeneration areas. The riverside regeneration sites are all previously developed land and are therefore unlikely to contain any important supporting habitat. The requirement for project level HRA for individual development would also ensure that there is no loss of important supporting habitat as a result of the waterfront regeneration areas.
- 4.67 Policy CS33 (Lodge Hill) proposes the development of a free-standing mixed-use settlement providing 5,000 homes, 5,000 sq m GEA retail and at least 43,000 sq m GEA for business uses. Ecological surveys undertaken as part of the Lodge Hill evidence base did not identify any habitats that could be considered of importance to the European designated bird species. Wintering and breeding bird surveys did not identify any European protected bird species on the site. It is therefore considered that the development of Lodge Hill will not result in the loss of any important supporting habitats.
- 4.68 Policy CS22 (Provision of Minerals) identifies areas of search for land won sand and gravel that are within and adjacent to Medway Estuary & Marshes SPA/Ramsar. Mineral activities within these areas has the potential for adverse effects on the integrity of Medway Estuary &

Marshes SPA through habitat loss and fragmentation. To address this issue we would recommend the Council amend Figure 7 1(Land won sand and gravels) to illustrate the relationship between the search areas and the European designated site boundaries. The boundary of the search area should be outside of the European site boundaries. Additional text should also be included to ensure no significant adverse effects on European sites.

- 4.69 Policy CS23 (Waste Management) identifies waste disposal to land resource areas that are directly adjacent to the Medway Estuary & Marshes SPA/Ramsar. The development of a landfill directly adjacent to the European site has the potential for adverse effects on its integrity. To address this issue we would recommend the Council amend Figure 7 3(Potential final Waste Disposal to Land resource Area) to illustrate the relationship between the search areas and the European designated site boundaries. The boundary of the search area should be outside of the European site boundaries. Additional text should also be included to ensure no significant adverse effects on European sites.
- 4.70 Policy CS17 (Employment Development) makes provision for the expansion of the existing economic functions of the area, which includes the development of the Isle of Grain employment site and the Kingsnorth commercial park. Both of these employment sites are adjacent to European sites and have been allocated for employment development for many years. Both sites have been granted planning permission for B1, B2 and B8 uses. Given the proximity of European sites any expansion of the employment areas outside their existing boundary could result in the loss of designated and or supporting habitats. It is recommended that any future employment development should remain within the existing boundary of the employment areas to avoid the loss or fragmentation of designated and or supporting habitats.

What existing mitigations are provided in the Core Strategy?

- 4.71 A number of measures have been included within the PDCS to protect habitats and avoid loss or fragmentation:
- Policy CS6 (Preservation and Enhancement of Natural Assets) seeks to protect, maintain and enhance important wildlife habitats and species through long term management and habitat creation schemes that increase connectivity. It also ensures that when development is permitted, opportunities are pursued and secured for the incorporation, enhancement, re-creation or restoration of wildlife habitat, either on-site, off-site or through contributions to the strategic provision of natural open space and that these strategies are in place and functioning prior to commencement of the development. The Policy also states that any negative impact on recognised wildlife habitats or other biodiversity features should be avoided or minimised through the appropriate siting and/or design of development. Where the negative impact cannot be avoided,

but the importance of the development is considered to outweigh the impact, then environmental compensation will be sought by the creation by the developer of new habitats or features on other suitable sites and their long term management will need to be secured. The policy also states that compensation will normally be provided on more than like-for-like basis, in order to secure both the maintenance and enhancement of biodiversity.

- The protection of important wildlife habitats in the countryside is reinforced by Policy CS7 (Countryside and Landscape), which requires that proposals have regard to the type and distribution of wildlife habitats.
- Policy CS35 (Developer Contributions) requires that where the need arises the Council will seek to enter into a legal agreement with the developer(s), to provide for environmental mitigation or compensation measures where mitigation on site is impossible or inadequate on its own.
- The Core Strategy (Policy CS8: Open Space, Green Grid and Public Realm) also ensures that opportunities will be sought for new development to provide open space and contributes to the formation of the green grid.

Further recommendations for avoidance and mitigation

- It is recommended that Policy CS6 (Preservation and Enhancement of Natural Assets) incorporates wording to ensure that supporting habitats are protected, maintained and enhanced and that the Council does not permit development that could lead to the loss or fragmentation of these habitats unless it can be demonstrated that appropriate mitigation is available. Further detail on the types of supporting habitat could be clarified in the supporting text of the policy.
- It is recommended that Figure 7 1 (Land won sand and gravels) is amended to illustrate the relationship between the search areas and the European designated site boundaries. The boundary of the search area should be outside of the European site boundaries. Additional text should also be included to ensure no significant adverse effects on European sites.
- It is recommended that Figure 7 3 (Potential final Waste Disposal to Land resource Area) is amended to illustrate the relationship between the search area and the European designated site boundaries. The boundary of the search area should be outside of the European site boundaries. Additional text should also be included to ensure no significant adverse effects on European sites.
- The HRA undertaken for the Allocations and Development Management DPD will be required to include consideration of the potential impacts of waste and minerals allocations and the recommendations of this HRA will need to be incorporated into the DPD.
- It is recommended that any future employment development at the Isle of Grain employment site and the Kingsnorth commercial

park should remain within the existing boundaries of the employment areas, unless it can be shown that there will be no loss of designated and/ or supporting habitats.

Water Levels & Quality

- 4.72 The screening assessment identified that there was the potential for likely significant effects at the following European sites through reduced water levels and quality:

- Medway Estuary & Marshes SPA/Ramsar
- North Downs Woodlands SAC
- Peters Pit SAC
- Queendown Warren SAC
- Thames Estuary & Marshes SPA/Ramsar
- The Swale SPA/Ramsar

What are the issues arising from the plan?

- 4.73 The level of development proposed in the Core Strategy has the potential to act in combination with development proposed in surrounding areas through increased levels of abstraction to provide water supply; increased pressure on sewerage capacity and increased surface water run-off.

How might the European sites be affected?

- 4.74 Increased abstraction has the potential to lead to reduced water levels, which can have adverse effects on the integrity of water dependent European sites. Changes to water levels can impact river flow and water quality, which can adversely affect water dependent habitats and the species that rely upon them. Increased waste water discharges (consented) and surface water run-off (which can transfer pollutants to water bodies) have the potential to reduce water quality, which can also have adverse effects on designated habitats and species.

Which other plans/ projects could lead to in-combination effects?

- 4.75 The following plans and programmes have the potential to act in-combination with the Core Strategy as they propose development that will lead to the cumulative increase in water abstraction, consented discharges and surface water run-off:
- Swale Borough Council Core Strategy
 - Gravesham Borough Council Core Strategy
 - Dartford Borough Council Core Strategy
 - Maidstone Borough Council Core Strategy
 - Tonbridge and Malling Borough Core Strategy

- Southern Water - Water Resource Management Plan
- South East Water - Water resource Management Plan
- Thames Estuary 2100 Plan (TE2100)
- Kent Local Transport Plan
- Kent County Council Minerals and Waste Core Strategy
- Isle of Grain to South Foreland Shoreline Management Plan
- Medway Estuary and Swale Shoreline Management Plan
- Medway Local Transport Plan 2011-2026
- London Gateway - Deep Sea Container Port

What is the current situation?

- 4.76 Water resources: The principal supplier of water to the Medway area is Southern Water with South East Water and Thames Water also serving small parts of the District. At present 76% of the water is supplied from local groundwater sources with the remainder (24%) from surface water sources outside the area. There are 34 groundwater sources and 1 surface water source within the local area.
- 4.77 According to the figures within Southern Water's Water Resources Management Plan (WRMP) average annual demand within the Kent Medway Water Resource Zone (WRZ) is 111.97 Megalitres per day (MI/d), which can rise to 148.95 MI/d during peak times in dry years. This will increase given the level of growth proposed within the Kent Medway WRZ itself and surrounding areas. To meet demand the WRMP proposes a number of measures, which include:
- Universal metering for both domestic and commercial properties
 - Asset improvement schemes for groundwater sources (10.25 MI/d peak, 8.75 MI/d average)
 - Optimisation of interzonal transfers (to Kent Thanet WRZ)
- 4.78 Even with these measures in place the WRMP predicts that on the basis of the average annual period²⁰, there will be a deficit within the Kent Medway WRZ during 2010-11. The WRZ would then go into surplus in 2014/15 and continue to be in surplus until the end of 2019/20. However, at the end of the period 2024-2025 supply is forecast to return to deficit. Alternatively using the peak demand period²¹ as the basis instead, the WRMP predicts the supply to the Kent Medway WRZ to begin and remain in surplus till after 2034/35. However this would require a consistently reliable rainfall pattern and all planned supply measures being put in place. The predictions made by the WRMP are based on the assumption that proposed measures will be implemented within the time periods specified.

²⁰ The "average annual period", whereby average demand over the year is compared against the average annual supplies that are available.

²¹ The "peak demand period", whereby the demands over the period of peak demand during the year, normally defined as a week, are compared against the supplies available during that period.

- 4.79 Water quality: River water quality in Medway is currently assessed as having moderate ecological quality. Groundwater is assessed having good chemical quality with poor chemical quality in certain areas. The Medway and Thames Estuaries are both assessed as having moderate ecological quality and poor chemical quality.
- 4.80 The effects of abstraction and discharge of water on European sites are considered through the Environment Agency's Habitats Directive Review of Consents process (RoC). The RoC concluded that no existing permissions for abstraction or discharge are posing a risk of adversely impacting the designated interest features of the North Down Woodland SAC, Peter's Pit SAC, Queendown Warren SAC and The Swale SPA.
- 4.81 Stage 4 RoC Action Plans were prepared for both the Medway Estuary & Marshes SPA and the Thames Estuary & Marshes SPA as a number of existing permissions had the potential for adverse effects on site integrity. For the Thames Estuary & Marshes SPA the Action Plan identified 11 discharge consents that posed a risk of adverse effect on site integrity due to their potential contribution of copper, which may have contributed to an exceedance to the environmental standard for copper within the estuary. Further consideration of the water quality data for the Thames Estuary revealed that the concentration of copper in the estuary has fallen and that the environmental standard for copper has not been exceeded since 2003. In addition, the EA undertook further water quality modelling to produce a copper budget that demonstrates only a fraction of copper present in the site is attributable to the consented discharges, and consideration was given to how future planned improvements to a number of the Sewage Treatment Works (STWs) will significantly reduce copper loads in the treated effluent through to 2020. As a result a conclusion of no adverse effect on site integrity was reached for the 11 discharge consents acting alone and in combination. One further discharge consent was identified as posing a risk of habitat loss from siltation. After further investigations the EA concluded that the discharge consent should be affirmed and that a management plan agreement be drawn up between NE and the discharger.
- 4.82 For Medway Estuary & Marshes SPA the RoC process identified one discharge consent that could not be shown to have no adverse effect alone due to toxic contamination. The consent is held by Southern Water Services Ltd. and permits the discharge of treated sewage effluent from Motney Hill STW. A further three consents permitting the discharge of trade effluent from industrial/trade premises could not be shown to have no adverse effect in combination with each other and Motney Hill STW. The risk of impact from all four discharges was that of toxic contamination within the site, particularly from copper. The RoC proposed modifications to the discharge consent for Motney Hill STW and concluded there will be no adverse effect on the integrity of the European site as a result of the identified consents.

- 4.83 The Stage 4 Action Plan for Medway Estuary & Marshes SPA also identified two abstraction licences that could not be shown to have no adverse effect when assessed in combination with the previously discussed discharge consents. The EA concluded that the modification of the discharge consent for Motney Hill STW would remove the risk of adverse effect from the Southern Water Services Ltd. discharge consent acting alone and thus remove the majority of the risk posed to the site, making the remaining in-combination risks negligible. As a result a conclusion of no adverse effect was reached for the remaining two abstraction licences.

Is there potential for adverse effects on the integrity of European sites?

- 4.84 All of the identified European sites are sensitive to changes in water levels and quality, in particular European sites with water dependent interest features. Sufficient levels of freshwater inputs are important to the designated species and habitats. Development proposed in the Core Strategy (provision of 17,930 new homes and 935,998 sq m of employment floorspace between 2006 and 2028) and surrounding areas will increase abstraction levels which has the potential to result in reduced water levels. Development proposed in the PDCS and surrounding areas will also increase pressure on sewerage capacity and increase levels of surface water run-off, which can result in reduced water quality. Effluent discharges can contain contaminants which build up in the food chain and can have toxic effects on organisms. They can also contain non-toxic contaminants, such as oxygen-depleting substances and nutrients. Eutrophication of water based habitats can lead to the excessive growth of planktonic or benthic algae, which is caused by increased nutrient inputs originating from sewage or agricultural run-off. Medway Estuary & Marshes SPA/Ramsar, Thames Estuary & Marshes SPA/Ramsar and The Swale SPA/Ramsar are designated for a number of important bird species that rely upon a range of wetland habitats (e.g. estuaries, mudflats and saltmarsh). Water quality is an important factor in maintaining the plant and animal communities, which support the important bird populations by providing feeding, nesting and roosting areas.
- 4.85 Any applications for new abstraction licences are assessed by the EA through the RoC process to ensure that adverse impacts on internationally important nature conservation sites do not occur. If the assessment of a new application shows that it could have an impact on a European site the EA follows strict rules in setting a time limit for that license. This ensures that water levels at European sites do not fall below critical levels. This could involve the issue of a license with conditions attached, such as a 'Hands-Off Flow' condition. This specifies that if the flow or level in the river drops below that which is required to protect the environment, the abstraction must stop. The EA also has a duty to assess the effects of consented discharges to address the potential for impacts on internationally important nature conservation sites. This regulated process serves to protect European sites.

- 4.86 Even with the regulatory processes in place to protect European sites there is still uncertainty with regard to the potential impacts of proposed development on the integrity of European sites through reduced water levels and quality. At a strategic level the Council should seek to ensure that Core Strategy policies address these issues and put robust policy measures in place to provide mitigation.

What existing mitigations are provided in the Core Strategy?

- Policy CS3 (Mitigation and Adaptation to Climate Change) requires residential development to achieve Code for Sustainable Homes Level 3 until the end of 2013, Code Level 4 between 2014 and 2016 and then Code Level 5 from the beginning of 2016. In addition the policy requires all residential development to achieve water efficiency of no more than 80 litres per person per day. Commercial buildings (over 1,000 sq m) to meet BREEAM 'very good' standard until 2016 and thereafter BREEAM 'excellent'. Policy CS3 also supports the proposals in the Southern Water's Final Water Resources Management Plan, 2010- 2035 or other measures that have been agreed to improve the efficiency of water use and maintain supplies at the level required to meet local needs. It also supports the objectives of the Water Framework Directive for water bodies to reach Good Ecological Status by 2027.
- Policies CS3 (Mitigation and Adaptation to Climate Change) and CS5 (Development and Flood Risk) require that development should incorporate Sustainable Urban Drainage Systems in line with national standards, prior to construction.
- Policy CS35 (Developer Contributions) requires that where the need arises the Council will seek to enter into a legal agreement with the developer(s), to provide for new physical infrastructure.

Further recommendations for avoidance and mitigation

- 4.87 To address the uncertainty surrounding water levels and quality it is recommended that Policy CS3 contain the following additional points:
- The policy should include wording to ensure that development proposals that pose material risk or harm to the quality and/or quantity of ground waters, surface waters, wetlands or coastal water systems either alone or in combination will not be permitted.
 - It should also require that major proposals for new development should be able to demonstrate that there are, or will be, adequate water supply and waste-water treatment facilities in place to serve the whole development.
 - The policy should require Sustainable Drainage Systems to be incorporated into all new development.
- 4.88 It is also recommended that Policy CS33 (Lodge Hill) should be amended to require that any proposal for the site is accompanied by a surface water strategy that considers the incorporation of Sustainable Drainage Systems.

- 4.89 The policy mitigation outlined above is effective plan level mitigation and will contribute to minimising the impacts of proposed development on the water environment. However, given the ongoing pressures on water resources for domestic supply, including the implications of climate change for water supply reliability, it is recommended that the Council consider a requirement for water neutrality for large/strategic development proposals and also provide further detail in relation to water efficient devices and rainwater harvesting. This is a matter that should be further addressed through the Land Allocations and Development Management DPD.

5.0 HRA CONCLUSIONS

- 5.1 This report outlines the methods used and the findings arising from the Appropriate Assessment stage of the Habitats Regulations Assessment for the Medway Core Strategy. The HRA of the Core Strategy has been undertaken in accordance with available guidance and good practice and has been informed by the HRA screening work and findings produced for earlier iterations of the Core Strategy, as well as advice received from Natural England and wider stakeholders.
- 5.2 The first stage of the HRA process (screening) considered the likely significant effects of the Core Strategy on nine European sites within the influence of the plan. The screening concluded that the effects of the Plan on the nine European sites through reduced air quality and reduced water levels and quality was uncertain. It also concluded that the effects of the plan on six of the European sites (coastal and estuarine SPAs and Ramsar sites) through habitat loss and fragmentation was uncertain. Based on the precautionary approach these issues were progressed through to the Appropriate Assessment stage to be considered in more detail. The screening also concluded that there was the potential for likely significant effects on six of the European sites (coastal and estuarine SPAs and Ramsar sites) through increased recreational activity. This issue was progressed through to the AA stage to be considered in more detail.
- 5.3 The AA considered the potential for the Core Strategy (both alone and in combination) to have adverse effects on the integrity of identified European sites through reduced air quality and reduced water levels and quality. Based on the sensitivity of the European sites, as well as mitigation provided through Core Strategy Policies and recommendations made by the AA, it was assessed that the Core Strategy alone would not have adverse effects on the European sites through reduced air quality. However, given a lack of available evidence the AA was unable to conclude with certainty that the Core Strategy would not have adverse effects on the integrity of the identified European sites through reduced air quality (in combination) and reduced water levels and quality (both alone and in combination). To strengthen the mitigation already proposed in the Plan the AA recommended a number of policy safeguards to help provide effective plan level mitigation that will contribute to minimising the impacts of proposed development on air quality, water levels and water quality.
- 5.4 The assessment also considered the potential for the Core Strategy to have adverse effects on the estuarine and coastal SPAs and Ramsar sites through habitat loss and fragmentation. The AA concluded that as the majority of development is being directed on previously developed land and the Lodge Hill area does not contain any suitable supporting habitat for designated bird species the Core Strategy will not have adverse effects on European site integrity (either alone or in

combination) through habitat fragmentation and loss, provided the recommendations of the AA are incorporated in to the Plan.

- 5.5 The AA then considered the potential for the Core Strategy to have adverse effects on the integrity of North Downs Woodlands SAC; Thames Estuary & Marshes SPA/Ramsar; Medway Estuary & Marshes SPA/Ramsar and The Swale SPA/Ramsar through disturbance. The assessment concluded that the Core Strategy would not have adverse effects on the integrity of North Downs Woodlands SAC through disturbance as there is no evidence to suggest recreational activity on the site is affecting qualifying features and available information suggests that site level management, such as continuous grazing of the grassland feature is the most important factor in maintaining site integrity.
- 5.6 The findings of the first phase of the NKEPG bird disturbance work suggests that there may be a correlation between recreational disturbance and bird decline along the North Kent coast and that recreational visitors tend to be from within the local area. This is significant given the level of development proposed in the Core Strategy, particularly the development of 5,000 new homes at Lodge Hill (Policy CS33), which is within 2 km of the Thames Estuary & Marshes SPA/Ramsar and the Medway Estuary & Marshes SPA/Ramsar. To strengthen the mitigation already proposed in the Plan the AA recommended policy wording to ensure that the findings of the bird disturbance studies are implemented and any proposed strategic avoidance and/or mitigation measures are adopted, as appropriate in all planning documents and in the assessment of planning application. The AA also made specific recommendations for the development of Lodge Hill to ensure that any proposal for the site will incorporate suitable alternative areas for recreation. In particular, it recommends suitable alternatives for dog walking, the recreational activity that is identified by the bird disturbance work as having the greatest impact.
- 5.7 The AA concluded that until future phases of the NKEPG work have been completed - further surveys and predictive modeling - it is not possible to quantify the contribution that planned growth in Medway and surrounding areas may have on bird populations at the Medway Estuary & Marshes SPA/Ramsar, Thames Estuary & Marshes SPA/Ramsar and The Swale SPA/Ramsar. As a result the assessment could not conclude with certainty that the Core Strategy will not have adverse effects on the integrity of the SPAs and Ramsar sites through increased recreational activity. Policy mitigation provided in the Core Strategy and joint working at a strategic level can help to mitigate the impacts of recreational activity to a certain extent, however; the direct impacts of recreational activity are most appropriately addressed at the site level through co-operative measures.
- 5.8 Provided that the recommendations of the AA are incorporated, it is considered that the Core Strategy will contain effective strategic plan level mitigation to address the issues identified through the HRA

process, as far as is possible within the remit of a planning document. The plan should, however be seen in conjunction with the need for wider measures (e.g. effective European site management and coordinated regional approaches to air quality). The findings of this plan level HRA do not obviate the need to undertake HRA for lower level, project scale/ implementation plans where there is potential for a significant effect on one or more European Sites. Accordingly, this AA should be used to inform any future assessment work. It should also be revisited in the light of any significant changes to the Core Strategy and/ or if any further information becomes available, including further studies commissioned by the NKEPG.

- 5.9 These findings have been subject to comments and advice from NE and wider stakeholders.

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Appendix 1: European Site Characterisations

MEDWAY ESTUARY & MARSHES			
Site Name			
Designation[s]	SPA	Ramsar	
Area (ha)	4684.36	4969.74	
Site Code	UK9012031	UK11040	
Reason for Designation	During the breeding season the area regularly supports (Article 4.1): ■ <i>Recurvirostra avosetta</i> 6.2% of the GB breeding population ■ <i>Sterna albifrons</i> 1.2% of the GB breeding population ■ <i>Sterna hiruendo</i> 0.6% of the GB breeding population Over winter the area regularly supports: ■ <i>Cygnus columbianus bewickii</i> 0.2% of the GB population ■ <i>Recurvirostra avosetta</i> 24.7% of the GB population Over winter the area regularly supports (Article 4.1): ■ <i>Anas acuta</i> 1.2% of the population ■ <i>Anas clypeata</i> 0.8% of the population in GB ■ <i>Anas crecca</i> 1.3% of the population in GB ■ <i>Anas Penelope</i> 1.6% of the population in GB ■ <i>Arenaria interpres</i> 0.9% of the population in GB ■ <i>Branta bernicla bernicla</i> 1.1% of the population ■ <i>Calidris alpina alpina</i> 1.9% of the population		
	Criterion 2: Site supports number of rare plant and animal species ■ <i>Hordeum marinum</i> sea barley ■ <i>Parapholis incurva</i> curved hard-grass ■ <i>Polypogon monspeliensis</i> annual beard-grass ■ <i>Puccinellia fasciculata</i> Borrer's saltmarsh-grass ■ <i>Bupleurum tenuissimum</i> slender hare's-ear ■ <i>Trifolium squamosum</i> sea clover ■ <i>Chenopodium chenopodioides</i> saltmarsh goose-foot ■ <i>Inula crithmoides</i> golden samphire ■ <i>Sarcocornia perennis</i> perennial glasswort ■ <i>Salicornia pusilla</i> one-flowered glasswort Total of at least twelve British Red Data Book species of wetland invertebrates have been recorded on the site. Criterion 5: Assemblages of international importance – species with peak count in winter 47637 waterfowl Criterion 6: Species/populations occurring at levels of international importance		

	■ <i>Calidris canutus</i> 0.2% of the population ■ <i>Charadrius hiaticula</i> 1.6% of the population ■ <i>Haematopus ostralegus</i> 1% of the population in GB ■ <i>Limosa limosa islandica</i> 12.9% of the population in GB ■ <i>Numenius arquata</i> 1.7% of the population in GB ■ <i>Pluvialis squatarola</i> 2% of the population ■ <i>Tadorna tadorna</i> 1.5% of the population ■ <i>Tringa nebularia</i> 2.6% of the population in GB ■ <i>Tringa tetanus</i> 2.1% of the population Article 4.2 Qualification: An internationally important assemblage of birds: During the breeding season the area regularly supports <i>Alcedo atthis</i>, <i>Anas platyrhynchos</i>, <i>Asio flammeus</i>, <i>Aythya ferina</i>, <i>Circus cyaneus</i>, <i>Falco columbarius</i>, <i>Gavia stellata</i>, <i>Phalacrocorax carbo</i>, <i>Vanellus vanellus</i>. Over winter the area regularly supports 65496 waterfowl including: <i>Gavia stellata</i>, <i>Podiceps cristatus</i>, <i>Phalacrocorax carbo</i>, <i>Cygnus columbianus bewickii</i>, <i>Branta bernicla bernicla</i>, <i>Tadorna tadorna</i>, <i>Anas penelope</i>, <i>Anas crecca</i>, <i>Anas platyrhynchos</i>, <i>Anas acuta</i>, <i>Anas clypeata</i>, <i>Aythya ferina</i>, <i>Haematopus ostralegus</i>, <i>Recurvirostra avosetta</i>, <i>Charadrius hiaticula</i>, <i>Pluvialis squatarola</i>, <i>Vanellus vanellus</i>, <i>Calidris canutus</i>, <i>Calidris alpina alpina</i>, <i>Limosa limosa islandica</i>, <i>Numenius arquata</i>, <i>Tringa totanus</i>, <i>Tringa nebularia</i>, <i>Arenaria interpres</i>.	■ Grey plover (<i>Pluvialis squatarola</i>) 1.2% of the population ■ Common redshank (<i>Tringa totanus totanus</i>) 1.4% of the population ■ Dark-bellied brent goose (<i>Branta bernicla bernicla</i>) 1.1% of the population ■ Common shelduck (<i>Tadorna tadorna</i>) 3.3% of the GB population ■ Northern pintail (<i>Anas acuta</i>) 1.8% of the population ■ Ringed plover (<i>Charadrius hiaticula</i>) 1.6% of the GB population ■ Red knot (<i>Calidris canutus islandica</i>) 1% of the population ■ Dunlin (<i>Calidris alpina alpina</i>) 1.4% of the GB population

Conservation Objectives	The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition (*), with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, cSAC, SPA, Ramsar). Habitat Types represented (Biodiversity Action Plan categories) Improved Grassland Fen, Marsh and Swamp Littoral Sediment Coastal Lagoon Geological features (Geological SiteTypes) N/A (*) or restored to favourable condition if features are judged to be unfavourable.

Site Name	NORTH DOWNS WOODLANDS
Designation[s]	SAC
Area (ha)	287.58
Site Code	UK0030225
Reason for Designation	Annex I habitats that are a primary reason for selection of this site: ■ <i>Asperulo-Fagetum</i> beech forests ■ <i>Taxus baccata</i> woods of the British Isles * Priority feature Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: ■ Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>)
Conservation Objectives	Wouldham to Detling Escarpment SSSI

	The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition (*), with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, cSAC, SPA, Ramsar). Habitat Types represented (Biodiversity Action Plan categories) Broadleaved, mixed and yew woodland Lowland calcareous grassland Geological features (Geological SiteTypes) Disused Quarries, Pits and Cuttings (*) or restored to favourable condition if features are judged to be unfavourable. Halling to Trottisccliffe Escarpment SSSI The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition (*), with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, cSAC, SPA, Ramsar). Habitat Types represented (Biodiversity Action Plan categories) Broadleaved, mixed and yew woodland Lowland calcareous grassland Geological features (Geological SiteTypes) N/A (*) or restored to favourable condition if features are judged to be unfavourable.

Site Name		PETERS PIT
Designation[s]		SAC
Area (ha)	28.3	
Site Code	UK0030237	
Reason for Designation	Annex II species that are a primary reason for selection of this site: ■ Great crested newt <i>Triturus cristatus</i>	
Conservation Objectives	The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition (*), with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, SAC, SPA, Ramsar). Habitat Types represented (Biodiversity Action Plan categories) - Standing open water and canals - Broadleaved, mixed and yew woodland - Lowland calcareous grassland - Inland Rock Geological features (Geological SiteTypes) N/A (*) or restored to favourable condition if features are judged to be unfavourable.	

Site Name		QUEENDOWN WARREN
Designation[s]		SAC
Area (ha)	14.28	

Site Code	UK0012833
Reason for Designation	Annex I habitats that are a primary reason for selection of this site: Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>)
Conservation Objectives	The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition (*), with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, cSAC, SPA, Ramsar). Habitat Types represented (Biodiversity Action Plan categories) Lowland Calcareous Grassland Geological features (Geological SiteTypes) Not applicable (*) or restored to favourable condition if features are judged to be unfavourable.

THAMES ESTUARY & MARSHES			
Site Name			
Designation[s]		SPA	Ramsar
Area (ha)	4838.94		5588.59
Site Code	UK9012021		UK11069
Reason for Designation	Over winter the area regularly supports (Article 4.1): <i>Circus cyaneus</i> 1% of the population in GB <i>Recurvirostra avosetta</i> 28.3% of the population in GB Over winter the area regularly supports (Article 4.2): <i>Calidris alpina alpina</i> 2.1% of the population	Criterion 2: Site supports one endangered plant species (<i>Lactuca saligna</i>) and at least 14 nationally scarce plants of wetland habitats. Site also supports 20 British Red Data Book invertebrates. Criterion 5: Assemblages of international importance – species with	

	■ <i>Calidris canutus</i> 1.4% of the population ■ <i>Limosa limosa islandica</i> 2.4% of the population ■ <i>Pluvialis squatarola</i> 1.7% of the population ■ <i>Tringa tetanus</i> 2.2% of the population On passage the area regularly supports: ■ <i>Charadrius hiaticula</i> 2.6% of the population Article 4.2 Qualification: An internationally important assemblage of birds: Over winter the area regularly supports 75019 waterfowl including <i>Recurvirostra avosetta</i>, <i>Pluvialis squatarola</i>, <i>Calidris canutus</i>, <i>Calidris alpina</i>, <i>Limosa limosa islandica</i>	peak counts in winter, 75019 waterfowl. Criterion 6: Species/populations occurring at levels of international importance. ■ Ringer plover (<i>Charadrius hiaticula</i>) 2.6% of the GB population ■ Black tailed Godwit (<i>Limosa limosa islandica</i>) 2.6% of the GB population ■ Grey plover (<i>Pluvialis squatarola</i>) 1.7% of the GB population ■ Red knot (<i>Calidris canutus</i>) 1.4% of the population ■ Common redshank (<i>Tringa tetanus</i>) 2.2% of the GB population ■ Avocet (<i>Recurvirostra avosetta</i>) 28.3% of the GB population ■ Hen Harrier (<i>Circus cyaneus</i>) 1.0% of the GB population
Conservation Objectives	The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition (*), with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, cSAC, SPA, Ramsar). Habitat Types represented (Biodiversity Action Plan categories) - Supralittoral Sediment - Littoral Sediment - Fen, Marsh and Swamp - Neutral Grassland – Lowland - Standing Open Water and Canals - Coastal Lagoon Geological features (Geological Site Types) N/A	

	(*) or restored to favourable condition if features are judged to be unfavourable.

THE SWALE			
Site Name			
Designation[s]			
Area (ha)	6514.71	SPA	Ramsar
Site Code	UK9012011		6514.71 UK11071
Reason for Designation	Over winter the area regularly supports (Article 4.1): ■ <i>Branta bernicla bernicla</i> 0.7% of the population ■ <i>Calidris alpina alpina</i> 2.3% of the population in Great Britain ■ <i>Tringa tetanus</i> 0.9% of the population During the breeding season the area regularly supports (Article 4.2): <i>Acrocephalus scirpaceus</i>, <i>Anas crecca</i>, <i>Anas platyrhynchos</i>, <i>Anas strepera</i>, <i>Charadrius hiaticula</i>, <i>Emberiza schoeniclus</i>, <i>Fulica atra</i>, <i>Gallinula chloropus</i>, <i>Haematopus ostralegus</i>, <i>Numenius arquata</i>, <i>Pluvialis squatarola</i>, <i>Tadorna tadorna</i>, <i>Tringa totanus</i>, <i>Vanellus vanellus</i>. Over winter the area regularly supports (Article 4.2): ■ 65588 waterfowl (5 year peak mean		
	Ramsar criterion 2 The site supports nationally scarce plants and at least seven British Red data book invertebrates. Ramsar criterion 5 Assemblages of international importance: Species with peak counts in winter: ■ 77501 waterfowl (5 year peak mean 1998/99-2002/2003) Ramsar criterion 6 – species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: ■ Common redshank , <i>Tringa totanus totanus</i> Species with peak counts in winter:		

	01/04/1998) Including: <i>Branta bernicla bernicla</i>, <i>Anas strepera</i>, <i>Anas crecca</i>, <i>Haematopus ostralegus</i>, <i>Charadrius hiaticula</i>, <i>Pluvialis squatarola</i>, <i>Calidris alpina alpina</i>, <i>Numenius arquata</i>, <i>Tringa totanus</i>.	■ Dark-bellied brent goose, <i>Branta bernicla bernicla</i> ■ Grey plover, <i>Pluvialis squatarola</i> Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in spring/autumn: ■ Ringed plover, <i>Charadrius hiaticula</i> Species with peak counts in winter: ■ Eurasian wigeon, <i>Anas penelope</i>, ■ Northern pintail, <i>Anas acuta</i> ■ Northern shoveler, <i>Anas clypeata</i> ■ Black-tailed godwit, <i>Limosa limosa islandica</i>
Conservation Objectives	The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition (*), with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, cSAC, SPA, Ramsar). Habitat Types represented (Biodiversity Action Plan categories) - Neutral grassland - Fen, marsh and swamp - Standing open water and canals - Littoral sediment Geological features (Geological Site Types) - Not applicable (*) or restored to favourable condition if features are judged to be unfavourable.	

Appendix 2: Plans, Programmes & Projects Review

River Basin Management Plan for the Thames River Basin District 2009		
Aim of the document	Elements of the plan that could cause 'in-combination' effects	HRA of the RBMP for the Thames RBD Nov 2009
The River Basin Management Plan is about the pressures facing the water environment in this river basin district, and the actions that will address them.	Darent and Cray catchment Some key actions for this catchment ▪ The Environment Agency will investigate the reasons for low ecological quality. ▪ Thames Water and the Environment Agency will investigate sewage misconnections the Darent and Cray. ▪ Thames Water and the Environment Agency will seek to fulfil the Darent Action Plan to secure sustainable abstraction in the Darent between Otford and Hawley. ▪ Thames Water will assess options for improving groundwater abstraction in the Upper Cray once approved in the Periodic Review. ▪ The Environment Agency will investigate sources of hydrocarbons and solvents in Crayford and Dartford and undertake pollution prevention visits at priority sites such as Westerham. ▪ The Environment Agency will work with landowners to address barriers to fish passage at sites including Vitbe Mill and Wellcome's structure at Dartford. ▪ The Environment Agency will carry out investigative monitoring and field work into the origins of, causes of and solutions to pollution. ▪ The Environment Agency will establish a 'Regional Better Rivers Programme' to improve habitat and	The assessment concluded that the river basin management plan is unlikely to have any significant negative effects on any Natura 2000 sites. The conclusion is reliant on the fact that before any measures in the plan are implemented they must be subject to the requirements of the Habitats Regulations. Any plans, project or permissions required to implement the measures must undergo an appropriate assessment if they are likely to have a significant effect.

	ecology in a first round of waters. ▪ The Environment Agency will carry out investigative monitoring and field work into the origins, causes and solutions to sedimentation. ▪ The angling club which controls the fishing at Preston Farm will have an enhancement plan that endeavours to improve the fish habitat. It will provide challenging and varied fly fishing, by installing flow deflectors, where it is deemed necessary. ▪ Pollution prevention campaigns around groundwater abstractions to decrease the inputs of nitrates, pesticides, hydrocarbons and solvents. Medway catchment Some key actions for this catchment ▪ Southern Water will improve sewage works at five locations to reduce inputs of nutrients including phosphate and improve shellfish waters. ▪ The Environment Agency will promote good practice to avoid pollution from construction sites in the Loose and Somerhill stream. ▪ South East Water will investigate abstraction from the Greensand Sources in the Leybourne and Bourne in the Periodic Review process. ▪ The Environment Agency will educate and raise awareness of the impact that small discharges to ground and surface water have on water quality of the receiving waters. This is with a view to advising residents of the need to connect to the mains sewer system across many of the rivers including the Barden Mill Stream, Teise, Eden, and Medway between the Eden, Crowborough and Yalding.	

	▪ The Environment Agency will identify and improve private discharges in rivers such as Eden at Bough Beech, Len and the Loose. ▪ The Environment Agency will carry out additional investigative monitoring and field work into the origins of, causes of and solutions to sedimentation in rivers including Somerhill Stream, Hammer Stream and the Medway at Weir Wood. ▪ The Environment Agency will carry out investigative monitoring and field work into the origins of, causes of and solutions to pollution where we need to improve certainty in many water bodies such as the river Bourne, Eridge Stream, Pippingford Brook and the Beult. ▪ The Environment Agency will establish a 'Regional Better Rivers Programme' to improve habitat and ecology in a first round of waters in rivers such as the Beult, Len and Loose Stream. ▪ The Environment Agency will work with landowners to address barriers to fish passage at sites including Allington and East Farleigh. ▪ The Environment Agency will re-survey of the upper reaches of the river Grom to establish current ecological quality, after improvements to the existing combine sewer outfall system. ▪ Pollution prevention campaigns around groundwater abstractions to decrease the inputs of nitrates, pesticides, hydrocarbons and solvents.	

Southern Water - Water Resource Management Plan 2010 - 2035 (October 2009)		
Aim of the document	Elements of the plan that could cause 'in-combination' effects	AA of the SW WRMP October 2009

Sets out how Southern Water proposes to ensure that there is sufficient security of water supplies to meet the anticipated demands of all its customers over the 25-year planning period from 2010 to 2035.	Kent Medway Water Resource Zone <i>Schemes during AMP5</i> ▪ Universal metering ▪ Asset improvement schemes for groundwater sources (10.25 MI/d peak, 8.75 MI/d average) ▪ Optimisation of interzonal transfers (to Kent Thanet) <i>Schemes beyond AMP5 - company only solution</i> ▪ Renewal of the C522 scheme bulk supply to South East Water ▪ Licence variation to the River Medway Scheme ▪ Licence variation of S271 groundwater source ▪ 6.5 MI/d of further leakage reduction <i>Schemes beyond AMP5 - Water Resources in the South East of England</i> As previous column, but additional schemes ▪ Aylesford wastewater recycling scheme ▪ Raising Bewl Water An the assumption that these will enable the following ▪ Bulk Supply from Bewl Water to South East Water ▪ Bulk Supply from Burham to South East Water	The AA concluded that the WRMP as proposed, and with the mitigation measures suggested at the more detailed project level that follows, would not adversely affect the integrity of the sites.
South East Water – Water Resource Management Plan 2010 - 2035		
Aim of the document	Elements of the plan that could cause 'in-combination' effects	HRA of SEW WRMP 2009

The Water Resource Management Plan outlines how South East Water intends to maintain the long-term balance between increasing demand and its available supplies.	A number of the water supply options have the potential to impact upon the integrity of European designated (Natura 2000) conservation sites. The HRA of the WRMP considered this in further detail.	An initial screening process identified that 27 feasible options had the potential to impact upon a Natura 2000 site through an impact pathway or proximity to such a site. These options were passed through a formal screening to determine whether any Likely Significant Effect existed. This 'LSE' test identified that 15 of these feasible options had the potential to have a Likely Significant Effect on the designated features of a Natura 2000 site. For these options, Appropriate Assessment would be required if the option was selected by SEW's final preferred strategy. Only one Appropriate Assessment was carried out, for Option 30a (Broad Oak Reservoir), as none of the other feasible options passing through Step 2 of the screening process was selected by SEW's final preferred strategy. This concluded that the option would have no significant effect on the integrity of the Natura 2000 sites affected by the proposals either alone, in-combination with other EA permissions, in-combination with the plans or projects of other competent authorities and prevailing background conditions or in-combination with other SEW proposed options. It should be noted that the outline and strategic nature of the assessment completed, combined with the uncertain timescale for the final implementation of this strategic option, make this 'in combination' assessment with other projects, plans and

		policies very uncertain. However, the assessment is undertaken 'in-combination' in order to try to ensure that all potential effects on Natura 2000 sites through the implementation of an option are explored and assessed, even if this is only a strategic level. Three options [30a, WRSE1 and 25(vii)] within SEW's final preferred strategy are likely to require Appropriate Assessment as part of any future scheme implementation. While it must be noted that the Appropriate Assessments completed as part of the WRMP option appraisal process are at a strategic level, as scheme definition and design are not yet finalised, the conclusions reached suggest that none of these options, with the inclusion of suitable mitigation, should adversely affect the integrity of any Natura 2000 sites.

Creating Sustainable Communities: Greening the Gateway; a Greenspace Strategy for Thames Gateway (ODPM/DEFRA 2004)		
Creating Sustainable Communities: Greening the Gateway: Implementation Plan (ODPM/DEFRA 2005)		
Aim of the document		Elements of the plan that could cause 'in-combination' effects
The objectives: ▪ That a network of varied and well-managed greenspace should be the setting for new and existing residential and commercial areas; ▪ That the landscape should be regarded as functional green infrastructure, recognising a		Encouraging inclusiveness and integration (integrating landscapes, private and public, green and built), protecting local character and distinctiveness, protecting designated sites (from SAMs to local and international ecological designations), habitat restoration and creation, a dynamic landscape (land management should be responsive, making use of temporary brown field sites, and combining greenspace

wide range of potential benefits from healthy recreation, to wildlife protection and enhancement, to flood risk management.	with flood management, etc). ▪ Housing growth – associated development/ construction and ongoing pressures from increased population e.g. recreation ▪ Enhanced transport infrastructure, potential impacts on air, water, land, landscape and townscape ▪ Increased recreational pressures

Waterfronts and Waterways in Kent Thameside - A Strategic Agenda 2005	
Aim of the document	Elements of the plan that could cause 'in-combination' effects
The paper represents a synopsis of the issues and opportunities of the Kent Thameside area raised by stakeholders and relevant Government Agencies. The Kent Thameside Delivery Board aims to provide the strategic leadership required to secure optimal use of this unique asset, and to create a waterfront to international standards.	The principal waterfront opportunity sites in Kent Thameside are: ▪ River Darent – neglected site with little public access, proposed plans recommend a mix of employment, retail and residential uses with landscaped promenade linking the town centre. ▪ Dartford Marsh – enormous potential as major open space due to designation as potential SSSI. ▪ Dartford Wharves and Ports – stakeholders wish to see these ports safeguarded for continued operational use. ▪ Greenhithe and Swanscombe Peninsula West – valued asset should be maintained for river related use. ▪ Swanscombe Peninsula East and Northfleet Embankment – conflict between industrial and residential use, problems with access ▪ Gravesend Town Centre – proximity to waterfront gives major advantage over other Thames Gateway towns. ▪ The Canal Basin Area and the Thames and Medway Canal – important feature in terms of local heritage, recreation potential and nature conservation. ▪ Blue Lake – major landscape feature provide dramatic setting for business/office space leisure development. ▪ Potential impacts on air, noise and water pollution

	▪ Indirect effects via recreation ▪ Habitat fragmentation and loss ▪ Increased access to sites via public transport ▪ Site disturbance ▪ Increase traffic generation

Thames Estuary 2100 Plan (TE2100)

Elements of the plan that could cause 'in-combination' effects	
Aim of the document The Environment Agency's Thames Estuary 2100 project (TE2100), is developing a tidal flood risk management plan for London and the Thames estuary.	Tidal defences in the context of the wider Thames Estuary setting; Assessing the useful life of the existing defences and gaining an understanding of the 'drivers' (i.e. climate change, urban development, social pressures and the environment); Inform and gain support of political and funding partners and stakeholders; and Prepare and manage a programme of studies (linked with consultation) that will eventually lead to a strategy for flood risk management in the Thames Estuary for the next 100 years ▪ Construction process - direct impacts and knock on effects ▪ Potential impacts on air, noise and water pollution ▪ Reduced area of adjacent habitats ▪ Site disturbance ▪ Pollution from runoff

Thames Gateway Strategic Framework Interim Report: Key Points, Policy Framework, Development Prospectus/Technical Annex 2006

Elements of the plan that could cause 'in-combination' effects	
Aim of the document The Interim Report describes in more detail what is planned for the three sub-regions of the Gateway (London, South Essex and North Kent) and what developments are going to happen when with	The strategy will build on the following opportunities: ▪ economic opportunity in the key transformational locations – Canary Wharf, Ebbsfleet Valley, the Olympic site/Stratford City and the Gateway Ports cluster

supporting information and links to data sources and other research.	▪ housing opportunity to accommodate the region's growing workforce and improve conditions for current residents ▪ employment opportunity in town centres and in key regeneration areas, developing the potential in local businesses and brownfield sites ▪ environmental opportunity through the creation of the Thames Gateway Parklands and new approaches to addressing climate change and flood risk ▪ community opportunity through investment in education and training, better quality public services and support for inclusive communities. ▪ Construction process - direct impacts and knock on effects ▪ Increase in waste ▪ Increase in abstraction rates and water use ▪ Potential impacts on air, noise and water pollution ▪ Indirect effects via recreation ▪ Obstruct foraging routes ▪ Reduced area of adjacent habitats ▪ Increased access to sites via public transport ▪ Site disturbance ▪ Increase traffic generation ▪ Pollution from runoff

Thames Gateway Interim Plan 2006	
Aim of the document	Elements of the plan that could cause 'in-combination' effects
This document is Government and The Thames Gateway Strategic Partnerships statement of common purpose that reflects their ambitions for the Gateway and how they will work together to achieve them. It aims to build on the opportunities offered by the Gateway.	A statement of common purpose that reflects ambitions for the Gateway, it explains how they will build on the opportunities it offers including economic opportunity in key locations and housing opportunity to accommodate the region's growing workforce. ▪ Construction process – direct impacts and knock on effects ▪ Increase in waste

	▪ Increase in abstraction rates and water use ▪ Contribution to traffic generation ▪ Potential impacts on air, noise and water pollution ▪ Indirect effects via recreation ▪ Obstruct foraging routes ▪ Reduced area of adjacent habitats ▪ Increased access to sites via public transport ▪ Site disturbance ▪ Increase traffic generation ▪ Pollution from runoff

Thames Gateway The Delivery Plan 2007

Aim of the document	Elements of the plan that could cause 'in-combination' effects
The Plan provides a framework for making the best use of public investment, local ownership, big project expertise and private sector entrepreneurship, while also setting out a proposed spending programme for 2008-11.	The Plan is structured around the three driving forces for positive change in the Gateway: a strong economy, improvements in the quality of life for local communities and the development of the Gateway as an eco-region. ▪ Enhanced transport network between the four spatial transformers, potential impacts on air, water, land, landscape and townscape ▪ The development of the new Estuary Path which will run along both banks of the river could increase recreational pressure. ▪ The Plan also supports the mixed-use development proposed as part of the Kent Thameside Waterfront Development.

Strategic Planning Guidance for the River Thames - RPG3B/9B 1997

Aim of the document	Elements of the plan that could cause 'in-combination' effects
Sets out the Governments planning policies for the River Thames and gives formal planning guidance to local planning authorities. Guidance presents a vision for the	For the built environment: - Enhance vitality of river front development potential and attract a range of users. Regenerate redundant land.

river to enhance its status and vitality and develop and exploit its potential.	River and Riverside - Encourage transport potential of river. - Promote the river for recreational purposes. - Maintain and improve public access to, along and across the river. ▪ Construction process – direct impacts and knock on effects ▪ Contribution to traffic generation ▪ Contribution to water traffic movement ▪ Obstruct foraging routes ▪ Reduced area of adjacent habitats ▪ Site disturbance ▪ Increase access to sites ▪ Potential impacts on air, noise and water pollution ▪ Indirect effects via recreation

The Adopted Kent and Medway Structure Plan 2006	
Aim of the document	Elements of the plan that could cause 'in-combination' effects
Provides strategic guidance for development and includes policies on pollution control.	Provides for: at, and between, the principal urban areas of Dartford and Gravesend/Northfleet major mixed use developments based on previously developed or other damaged land. Development will be comprehensively planned, including appropriate measures to integrate new development with existing communities, and phased in conjunction with the provision of new highway and public transport infrastructure, community services and facilities, air quality management initiatives, flood defences, and water resources and wastewater treatment infrastructure. Potential in-combination impacts arising from housing and economic development, population growth associated travel and recreational pressures. ▪ Construction process – direct impacts and knock on effects ▪ Contribution to traffic generation

	▪ Increased air, noise and water pollution ▪ Increased pressure on abstraction levels ▪ Increased levels of effluents ▪ Increased access to sites via public transport ▪ Site disturbance

Local Transport Plan for Kent 2011-2016		
Aim of the document	Elements of the plan that could cause 'in-combination' effects	SA & HRA of Kent's Local Transport Plan 3 Final Report (April 2011)
Its purpose is to set out Kent County Council's (KCC) Strategy and Implementation Plans for local transport investment for the period 2011-16.	Kent's approach to LTP3 has been based on the County Council's new Regeneration Framework, <i>Unlocking Kent's Potential</i>; a 25 year masterplan which identifies the opportunities and challenges facing the County over the coming decades. Supporting this is a Transport Delivery Plan for Kent, <i>Growth without Gridlock</i>, which highlights the key transport solutions needed over the next 20 years. The key elements of this delivery plan are securing a Lower Thames Crossing to support housing and employment growth in the Thames Gateway; delivering a long-term solution to Operation Stack; cutting congestion along the A21 corridor; improving rail journey times to East Kent; creating an integrated bus network; and linking new infrastructure process. The strategy approach for LTP3 has been to develop five Themes, based on the previous Government's five National Transport Goals as set out in the LTP3 Guidance, but made relevant to Kent: • Growth Without Gridlock • A Safer and Healthier County	The HRA screening concluded that there are no likely significant effects on European sites. The screening recommended that two schemes mentioned in the LTP3 - Kent International Airport Parkway Station and the Lower Thames Crossing - will require project-level HRA when more detailed proposals are developed.

	• Supporting Independence • Tackling a Changing Climate • Enjoying Life in Kent	

Kent County Council Minerals and Waste Core Strategy - Strategy and Policy Directions Consultation (May 2011)		
Aim of the document	Elements of the plan that could cause 'in-combination' effects	
Kent's new Minerals and Waste Development Framework (M&WDF) will set out the Council's strategy and planning policies for mineral extraction, importation and recycling as well as waste management of all of the waste streams that are generated or managed in Kent. It will only cover the county of Kent. Medway Council are addressing minerals and waste matters themselves in their own Local Development Framework (LDF). However Kent and Medway Councils have worked together in the preparation of part of the evidence base required for their Development Plan Documents (DPDs). The Core Strategy identifies the need and makes provision for the amount of waste treatment, mineral extraction and recycling that will be required in the County up to the end of 2030. It will also identifies the spatial pattern for minerals and waste development and broad areas showing where new facilities and sites are needed. It safeguards existing mineral importation facilities at wharves and rail sidings.	Suggestions for Strategic Sites for Minerals • Option 1A - The permitted, but as yet, undeveloped cement works at Medway Works, Holborough (which straddles the Medway/ Kent administrative boundary) and its associated, permitted, land-won minerals needed to supply the cement works. • Option 1B - Northfleet Bulk Aggregate Import Terminal, which has now been granted planning permission subject to Section 106 legal agreements. As it has an extant planning permission, there is no need to identify it as a 'Strategic Site', instead it will be safeguarded in policy. • Option 1C - The ragstone quarry at Hermitage Farm, Maidstone, which currently is the subject of a planning application for a major extension. • Option 1D - The extraction of clay at Norwood to provide void space for hazardous waste disposal. The stock of planning permissions for clay for engineering and sea defence work is more than sufficient for the plan period. • Option 1E - The underground limestone mine at Richborough. • Option 1F - Operational wharves at Greenhithe (Johnsons Wharf) and Northfleet Works. As these are operational they do not need to be strategic sites, instead they will be covered by safeguarding policies. • Option 1G - Other unspecified wharves and rail connected facilities with known connectivity /jetty capability that must be preserved for the future. Again, these will be better covered by safeguarding policies. • Option 1H - An extension at H&H Ightham Works.	

	Possible Options for Strategic Sites for Waste • Option 11A - A site which can deal with contaminated soil, asbestos and incinerator ash. A site located in Medway was suggested for this. However, Kent County Council cannot identify Strategic Sites outside its county boundaries. • Option 11B - The site at Richborough Power Station will be able to accommodate large scale Mechanical Biological Treatment (MBT) plant which could receive household and non household waste for treatment by rail or water. Waste biomass fuel can also be delivered to a power/Combined Heat and Power (CHP) station from the site by rail or water. • Option 11C - The clay quarry and hazardous waste landfill site at Norwood Farm, Sheppey. The operators have promoted an extension to this site through the 'Call for Sites'. • Option 11D - The existing Integrated Waste Management Centre at Richborough Hall and its proposed extensions. • Option 11E - The existing, operational composting facility at Blaise Farm (West Malling), which has capacity to treat up to 100,000tpa. The site has been promoted to the 'Call for Sites' for other waste management uses.

London Gateway		
Development proposed	Elements of the development that could cause 'in-combination' effects	HRA
The development of a major deep-sea container port and logistics park on the north bank of the River Thames.	Disturbance to feeding and roosting birds and loss of and disruption to the grazing marsh.	It was determined that direct effects on internationally and nationally designated sites would not be significant, however, indirect effects would be. The sites potentially affected are those listed below: ▪ the Thames Estuary and Marshes

		SPA/Ramsar - the Benfleet and Southend Marshes SPA/Ramsar - the Foulness SPA/Ramsar - the Essex Estuaries SAC Compensatory measures include the creation of a new specially protected area of inter-tidal mudflats, known as Site A, for birds and wildlife.

Medway Local Transport Plan 2011-2026		
Aim of the document	Elements of the plan that could cause 'in-combination' effects	
Medway's third Local Transport Plan (LTP) sets out Medway's transport strategy for the next 15 years and acts as a mechanism to obtain significant funding to deliver transport projects.	The Transport Strategy support Medway's plans by: - ensuring highway infrastructure is maintained to the highest possible standard within the available resources - efficiently managing and improving Medway's local highway network to ensure reliability of journey times - ensuring public transport becomes a realistic alternative choice to the private car - contributing to better health by encouraging walking and cycling and by improving accessibility to key services - ensuring that people can move around safely in Medway	

Maidstone Core Strategy Preferred Options, 2007		
Planned Development	Elements of the plan that could cause 'in-combination' effects	
Housing The final dwelling requirement for Maidstone	Disturbance - as a result of development near/ adjacent to European sites, including:	

between 2006-2026 will be determined through the South East Plan. However, it is likely to range between 8,200 – 10,080 (or 410pa – 504pa). The KMSP requirement is 6,500 between 2001-2016 (or 415pa) ▪ The Council will have regard to a number of other national, regional and local guidance when planning for affordable housing and other housing needs Employment ▪ New employment locations will be identified to meet the Kent and Medway Structure Plan (KMSP) requirement (36ha minimum) in the Land Allocations DPD. ▪ These will include high quality, mixed use business park environments, aimed at attracting companies in the technology and knowledge driven sectors which offer highly skilled, high wage employment. Transport ▪ To promote additional strategically located quality Park & Ride (P&R) locations, which promotes Best Practice and sustainability and has increased capacity and service levels together with a restriction on non-residential parking on town centre locations to influence modal choice in favour of alternative modes.	- o Recreation - o Light Pollution - o Noise Pollution ▪ Atmospheric Pollution - generated as a result of housing, employment and transport growth. ▪ Water Pollution - increased pressure on sewerage capacity and an increase in non-permeable surfaces. ▪ Water Abstraction - as a result of proposed development, potential for reduced water levels. ▪ Modified Drainage - as a result of proposed development altering surface and groundwater flow. ▪ Land Take - as a result of proposed development. ▪ Coastal Squeeze

Swale Borough Council Core Strategy: Pick your own - Issues and Strategic Spatial Options (Jan 2011)	
Aim of the document	Elements of the plan that could cause 'in-combination' effects
The Core Strategy sets out the vision and overall spatial strategy for the area and how it will be achieved for the period until 2031 and beyond. It focuses on outcomes,	Option 1 Continuing previous policy provision for development concentrated at urban areas <i>Results in housing provision of 13,500 homes, alongside the delivery of previously</i>

setting out broad areas and principles, and where, how and when development should be delivered across the Borough.	<i>identified employment sites to meet a lower growth scenario of 415,000 sq m. The option focuses upon urban areas within Thames Gateway, whilst at Faversham, policies promote the meeting of local needs. Rural areas are addressed by Development Management Policies intended to encourage their continued social, economic and environmental health. For new housing, some 4,500 houses would need to be identified, with most of these (circa 3,280 homes) requiring greenfield sites as urban extensions. At the Kent Science Park, further expansion is limited to existing environmental and transport capacity. The Sittingbourne Northern Relief Road would be completed to the A2, whilst further assessment of the capacity of Junction 5 of the M2 undertaken.</i> Option 2 Continuing previous policy provision for development concentrated at urban areas and larger villages. <i>As per option 1, with additional greenfield housing provision (circa 3,250) diverted from urban areas to larger village centres to support/expand their sustainability, as an alternative to urban extensions. Rural areas (outside identified larger villages) are addressed by Development Management Policies intended to encourage their continued social, economic and environmental health.</i> Option 3 Step change in employment growth and continuing previous policy provision for development concentrated at urban areas. <i>Housing growth levels and distribution as outlined in option 1, but led by employment provision at higher growth level (595,000 sq m), with additional 'step change' provision. Development provisions extending beyond plan period aimed at capturing greater share of economic development and meeting specific needs in key employment sectors. Greater housing focus upon urban previously developed land due to regeneration and expansion at Port of Sheerness. Villages close to employment locations considered for remaining greenfield housing provision. Major expansion of Kent Science Park with a new junction to M2 to form access to the Kent Science Park.</i> Option 4 Step change in employment and housing growth <i>Higher growth levels for housing (18,500 dwellings) and employment (595,000 sq m), with additional 'step change' provision. Development provisions extending</i>

	<i>beyond plan period aimed at capturing greater share of economic development and meeting specific needs in key employment sectors, supported by new housing. Additionally, the option focuses on the need to grow Sittingbourne as a main centre for enhanced retail and leisure facilities and to develop new transport infrastructure for the town. Focus for both greenfield and previously developed land for housing upon main urban areas at greater levels than options 1 and 2, including expansion of Port of Sheerness for housing, as part of wider employment expansion proposals. Circa 5,850 new homes on greenfield urban extensions and key village locations where close to employment opportunities and proposed new infrastructure, but with primary focus for both greenfield housing and employment growth on Sittingbourne and environs (inc. Bapchild).</i> Potential for proposed development to: ▪ Increase traffic ▪ Increased air, noise and water pollution ▪ Increased pressure on abstraction levels ▪ Increased levels of effluents ▪ Increased recreational activity

Tonbridge and Malling Adopted Core Strategy 2007		
Aim of the document	Elements of the plan that could cause 'in-combination' effects	HRA of Tonbridge and Malling Local Development Framework, Jan 2009
The Core Strategy is a key planning document under the new planning regime. It sets out the Council's vision,	Policy CP15 The submission version of the South East Plan requires an average rate of development in Tonbridge and Malling	The HRA was conducted on two European sites. Neither of relevance to this study.

aims and objectives which will determine the future pattern of development in the Borough over the period up until 2021 and the way in which the social, economic and environmental needs of the area can be delivered in the most sustainable way.	Borough of 425 dwellings per annum for the 2006-21 period; a total of 6,375 dwellings (or such other figure as may ultimately be included in the approved South East Plan). Over 90% of all housing developments will take place on previously developed land; well in excess of the Government's target. The Employment Land Review concluded that, subject to regular monitoring, the existing supply of land for employment development is sufficient, in quantitative and qualitative terms, to meet the employment needs of the Borough at least until 2016. In accordance with the precautionary approach, employment needs beyond 2016 will be reassessed at a future review of the Development Land Allocations DPD having regard to the results of monitoring. In order to deliver the strategic development sites identified in policy CP15, accommodate predicted traffic growth, improve air quality and relieve sensitive areas from traffic congestion, new transport infrastructure will be needed. Potential for proposed development to: ▪ Increase traffic ▪ Increased air, noise and water pollution ▪ Increased pressure on abstraction levels ▪ Increased levels of effluents ▪ Increased recreational activity	

Gravesham Borough Council (2011) Core Strategy and Development Management Policies Development Plan Document - Regulation 25 Consultation				
Development proposed		Elements of the development that could cause 'in-combination' effects		Appropriate Assessment Report (July 2010)
Over the period 2006 to 2026 the Council will make provision for 10,000 net new full-time equivalent (FTE) jobs and the delivery of 9,300 net dwellings, of which 9,200 should be within the Kent Thames Gateway sub-region. The strategic sites are:		Taking a strategic approach the AA identified the following aspects of the emerging Core Strategies that were considered to have implications for European sites: - Dartford and Gravesham Boroughs contain the area known as the 'Kent Thameside' regeneration area, one of the largest areas for development in the Thames Gateway. This scale of redevelopment has potential significant environmental effects on the Thames Gateway environment, including European sites. - The Draft South East Plan (revoked July 2010, however the level of development is still relevant) outlines requirements for 17,340 dwellings for Dartford and 9,200 for Gravesham in the period 2006 to 2026, in the urban area - this is a significant level of growth that will potentially have impacts on the built and natural environment of the Boroughs. - The Draft South East Plan (revoked July 2010, however the level of development is still relevant) also outlines requirements for 58,000 new jobs, and associated employment land in North Kent (Dartford, Gravesham,		The AA jointly considered the potential effects of the Dartford and Gravesham Core Strategies both alone and in-combination (with development proposed in surrounding areas) on the integrity of the Medway Estuary and Marshes SPA/Ramsar and the Thames Estuary & Marshes SPA/Ramsar. The findings of the AA indicate that there will not be an adverse effect on the integrity of the European sites, as the policies within the Core Strategies and existing regulatory and management measures provide a sufficient level of protection to mitigate potential likely significant effects. The AA recommends that Dartford and Gravesham Borough Council's give material consideration to
Strategic Site	Approximate Housing Development Requirement (No. of dwellings from draft SLAA)	Approximate Employment Development Requirement (Employment SOM)	Approximate Other Development Requirement (SOM - No. of jobs created from draft SLAA to be added)	
Ebbsfleet	1,064	107,000	49,000	
Land at Swanscombe Peninsula	-	40,000 (B1-B8)	70,000 (D2)	
Land at Northfleet Embankment West	910	850 (A1) 46,500 (B1, B2, B8)	180 (D2)	
Land at Northfleet Embankment East	1500	20,000 and 40,000 committed (B1, B2, B8)	33,000 (D1 and D2)	
Town Centre	810	42,330 (A1, A3, B1a, B2 and B8)	5,400 (D2, C1)	
Canal Basin	1,268	35,000 (rationalising existing employment)	-	
Total	5,552			

	Medway and Swale) between 2006 and 2026. • Development is planned to be focused close to existing urban areas and facilities. Development preferences are for redundant quarries, damaged land and brownfield sites, and river frontage development where possible and desirable. • New facilities and services, including strategic transport and green infrastructure, will be required to meet the needs of this increased growth. However, all development will need to reflect approaches that reduce the need for car travel and provide access to [transport] facilities. • The level of planned growth is likely to place significant strain on resources (particularly water resources, including the identified requirement for a 40 mega litre reservoir within the Dartford Borough), increase energy usage and waste production and increased pollution, particularly air pollution. • There will be additional pressure placed on the Thames Estuary and its natural environment from development pressure, including increased risk of water pollution and recreational activity. • There may be an increase in recreation at existing natural sites, for example woodlands, marshes and	the findings of the work undertaken by the North Kent Environmental Planning Group and to any avoidance, management actions and mitigation measures proposed to ensure that the requirements of the Habitats Directive are met.

	estuarine sites due to increased population, although this will be dependent on levels of access. Potential for proposed development to: ▪ Increase traffic ▪ Increased air, noise and water pollution ▪ Increased pressure on abstraction levels ▪ Increased levels of effluents ▪ Increased recreational activity	

Dartford Borough Council (2011) Core Strategy Submission Document.		
Development proposed	Elements of the development that could cause 'in-combination' effects	Appropriate Assessment Report (July 2010)
Development focussed in three priority areas: 1. Dartford Town Centre & Northern Gateway 2. Ebbsfleet to Stone 3. The Thames Waterfront The CS seeks provide sufficient capacity to achieve a net growth of up to approximately 26,500 jobs through:	Taking a strategic approach the AA identified the following aspects of the emerging Core Strategies that were considered to have implications for European sites: • Dartford and Gravesham Boroughs contain the area known as the 'Kent Thameside' regeneration area, one of the largest areas for development in the Thames Gateway. This scale of redevelopment has potential significant environmental effects on the Thames Gateway environment, including European sites. • The Draft South East Plan (revoked July 2010, however the level of development is still relevant) outlines	The AA jointly considered the potential effects of the Dartford and Gravesham Core Strategies both alone and in-combination (with development proposed in surrounding areas) on the integrity of the Medway Estuary and Marshes SPA/Ramsar and the Thames Estuary & Marshes SPA/Ramsar. The findings of the AA indicate that there will not be an adverse effect on the integrity of the European sites, as the policies within the Core Strategies and

1. The development of 760,000 sq m gross of employment floorspace (B1, B2, B8, A2 and sui generis) 2. Take-up of vacancies of existing employment estates 3. Protection of existing employment land for B1, B2, B8 and A2 uses 4. Facilitating job growth in services needed to support the growth in population, through identification of sites and granting of planning permission for retail, leisure and community facilities and working in partnership with service providers, including Kent County Council and the Health Authority to ensure that the provision comes forward.	requirements for 17,340 dwellings for Dartford and 9,200 for Gravesham in the period 2006 to 2026, in the urban area- this is a significant level of growth that will potentially have impacts on the built and natural environment of the Boroughs. • The Draft South East Plan (revoked July 2010, however the level of development is still relevant) also outlines requirements for 58,000 new jobs, and associated employment land in North Kent (Dartford, Gravesham, Medway and Swale) between 2006 and 2026. • Development is planned to be focused close to existing urban areas and facilities. Development preferences are for redundant quarries, damaged land and brownfield sites, and river frontage development where possible and desirable. • New facilities and services, including strategic transport and green infrastructure, will be required to meet the needs of this increased growth. However, all development will need to reflect approaches that reduce the need for car travel and provide access to [transport] facilities. • The level of planned growth is likely to place significant strain on resources (particularly water resources, including the identified requirement for a 40 mega litre reservoir within the Dartford Borough), increase energy usage and waste production and increased pollution, particularly air pollution. • There will be additional pressure placed on the Thames Estuary and its natural environment from development pressure, including increased risk of water pollution and recreational activity. • There may be an increase in recreation at existing natural sites, for example woodlands, marshes and estuarine sites due to increased population, although	existing regulatory and management measures provide a sufficient level of protection to mitigate potential likely significant effects. The AA recommends that Dartford and Gravesham Borough Council's give material consideration to the findings of the work undertaken by the North Kent Environmental Planning Group and to any avoidance, management actions and mitigation measures proposed to ensure that the requirements of the Habitats Directive are met.
The CS seeks to provide 17,340 homes in Dartford during the period 2006-2026. The indicative capacity is as follows: • Dartford Town Centre inc Northern Gateway up to 3,100 • Ebbsfleet to Stone up to 7,850 • Thames Waterfront up to 3,750 • Other sites north of A2 up to 2,400 • Sites south of A2, normally provided within village boundaries 200		

	this will be dependant on levels of access. Potential for proposed development to: ▪ Increase traffic ▪ Increased air, noise and water pollution ▪ Increased pressure on abstraction levels ▪ Increased levels of effluents ▪ Increased recreational activity	

Isle of Grain to South Foreland Shoreline Management Plan Review 2010		
Aim of the document	Elements of the plan that could cause 'in-combination' effects	Appendix J – Habitats Regulations Assessment 2009
The document provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. It identifies identify policies to manage coastal flood and erosion risks, deliver a wide ranging assessment of risks, opportunities, limits and areas of uncertainty.	Managed Realignment and Hold the Line Policies have the potential to result in freshwater habitat displacement and intertidal habitat growth.	Stage 2 - Assessment of Likely Significant Effect Stage 2 identified that the SMP would have a likely significant effect on the Ramsar sites / SPAs and SACs due to freshwater habitat displacement and intertidal habitat growth through Managed Realignment and Hold the Line Policies. Based on the 2002 North Kent Coastal Habitat Management Plan (CHaMP) for the area, coastal squeeze was not considered a likely significant effect at the time of the Stage 2 work. Stage 2 identified that there would be No Likely Significant Effect on Sandwich Bay and Dover to Kingsdown Cliffs SACs. Stage 3 - Appropriate Assessment The Habitats Regulations Assessment concludes that, Alone and In Combination, it is not possible to

		demonstrate that Managed Realignment policies would not have an Adverse effect on the integrity of the Thames Estuary and Marshes and The Swale SPA / Ramsar sites through displacement of Grazing Marsh and Standing Water habitats. Stage 4 Alternatives, Imperative Reasons for Overriding Public Interest (IROPI) and Compensation The competent authority identified the following less damaging alternatives: a) Hold the Line, or b) Managed Realignment with a Controlled Extent (to minimise ecological impact) The least damaging alternative for implementing this plan was considered to cause adverse effect either through freshwater habitat displacement or coastal squeeze. As such, the competent authority need to consider whether the plan is necessary and needs to be implemented for 'IROPI.' The Shoreline Management Plan was considered to have the following 'Imperative Reasons of Overriding Public Importance:' A need to address a serious risk to human health and public safety (uncoordinated and uncontrolled flood and erosion risks to large residential populations and major infrastructure); Where failure to proceed would have unacceptable social and/or economic consequences (loss of economic infrastructure, commercial property and community areas) through coastal flood and erosion damage;

		Whilst this is a damaging plan, it is the least damaging option for the designated sites in adjusting to the climate change impacts of sea level rise. This SMP therefore has beneficial consequences of primary importance for the environment. Proposed Freshwater Compensation Sites for Habitat Creation Programme Rank 1 – South Swale (Grazing Marsh & Standing Water) 665 ha Rank 2 – Possible additional sites within the Thames Estuary to be identified by the TE2100 programme (Grazing Marsh & Standing Water) tbc Should sufficient areas not be available within these sites, the RHCP will secure investigate locations increasingly further afield until suitable sites are found.

Medway Estuary and Swale Shoreline Management Plan Review 2010		
Aim of the document	Elements of the plan that could cause 'in-combination' effects	Appendix J – Habitats Regulations Assessment (amended 2007)
The document provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. It identifies identify policies to manage coastal flood and erosion risks, deliver a wide ranging assessment of risks, opportunities, limits and areas of uncertainty.	Managed Realignment and Hold the Line Policies have the potential to result in freshwater habitat displacement and intertidal habitat growth.	Stage 2 - Assessment of Likely Significant Effect Stage 2 identified that the SMP would have a likely significant effect on the Ramsar sites / SPAs due to freshwater habitat displacement and intertidal habitat growth through Managed Realignment Policies. Based on the 2002 North Kent Coastal Habitat Management Plan (CHaMP) for the area, coastal squeeze was not considered a likely significant effect at the time of the stage 2 work. Stage 2 identified that there would be No Likely Significant Effect on Peter's Pit SAC. Stage 3 Appropriate Assessment The Habitats Regulations Assessment concludes that, Alone and In Combination, it is not possible to demonstrate that Managed Realignment policies would not have an Adverse effect on the integrity of the Thames Estuary and Marshes and The Swale SPA / Ramsar sites through displacement of Grazing Marsh and Standing Water habitats. Stage 4 Alternatives, Imperative Reasons for Overriding Public Interest (IROPI) and Compensation The competent authority identified the following less damaging alternatives: a) Hold the Line, or b) Managed Realignment with a Controlled Extent (to

		minimise ecological impact) The least damaging alternative for implementing this plan was considered to cause adverse effect either through freshwater habitat displacement or coastal squeeze. As such, the competent authority need to consider whether the plan is necessary and needs to be implemented for 'IROPI.' The Shoreline Management Plan was considered to have the following 'Imperative Reasons of Overriding Public Importance:' A need to address a serious risk to human health and public safety (uncoordinated and uncontrolled flood and erosion risks to large residential populations and major infrastructure); Where failure to proceed would have unacceptable social and/or economic consequences (loss of economic infrastructure, commercial property and community areas) through coastal flood and erosion damage; Whilst this is a damaging plan, it is the least damaging option for the designated sites in adjusting to the climate change impacts of sea level rise. This SMP therefore has beneficial consequences of primary importance for the environment. Proposed Freshwater Compensation Sites for Habitat Creation Programme 0-20 Years Rank 1 - North Swale (Grazing Marsh & Standing Water) 370ha 20-50 Years

		Rank 2 - South Swale (Grazing Marsh & Standing Water) 665ha 50-100 Years Rank3 - Hoo St. Werburg (Grazing Marsh & Standing Water) 860ha Should sufficient areas not be available within these sites, the RHCP will secure investigate locations increasingly further afield until suitable sites are found.

Appendix 3: Publication Draft Core Strategy Policy Screening

Policy Screening: Categorising the Potential Effects of the Plan (Tyldesley, 2009)	
Criteria Category	Rationale
Category A: No negative effect	
A1	Options/ policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy.
A2	Options/ policies intended to protect the natural environment, including biodiversity.
A3	Options/ policies intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European site.
A4	Options/ policies that positively steer development away from European sites and associated sensitive areas.
A5	Options/ policies that would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to access for their effects on European Sites and associated sensitive areas.
Category B: No significant effect	
B	Options/ policies that could have an effect but would not be likely to have a significant (negative) effect on a European site (alone or in-combination with other plans or projects) because the effects are trivial or 'de minimis' even if combined with other effects.
Category C: Likely significant effect alone	
C1	The option, policy could directly affect a European site because it provides for, or steers, a quantity or type of development onto a European site, or adjacent to it.
C2	The option, policy could indirectly affect a European site e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically or physically connected to it or it may increase disturbance as a result of increased recreational pressure.
C3	Proposals for a magnitude of development that, no matter where it is located, the development would be likely to have a significant effect on a European site.
C4	An option, or policy that makes provision for a quantity/ type of development (and may indicate one or more broad locations e.g. a particular part of the plan area), but the effects are uncertain because the detailed location of the development is to be selected following consideration of options later in the plan or in a separate more specific plan . The consideration of options in the later plan will assess potential effects on European Sites, but because the development could possibly affect a European site a significant effect cannot be ruled out on the basis of objective information
C5	Options, policies or proposals for developments or infrastructure projects that could block options or alternatives for the provision

Policy Screening: Categorising the Potential Effects of the Plan (Tyldesley, 2009)	
Criteria Category	Rationale
	of other development or projects in the future, which will be required in the public interest, that may lead to adverse effects on European sites, which would otherwise be avoided.
C6	Options, policies or proposals which depend on how the policies etc are implemented in due course, for example, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European site
C7	Any other options, policies or proposals that would be vulnerable to failure under the Habitats Regulations at project assessment stage; to include them in the plan would be regarded by the EC as 'faulty planning'.
C8	Any other proposal that may have an adverse effect on a European site, which might try to pass the tests of the Habitats Regulations at project assessment stage by arguing that the plan provides the imperative reasons of overriding public interest to justify its consent despite a negative assessment.
Category D: Likely significant effects in combination	
D1	The option, policy or proposal alone would not be likely to have significant effects but if its effects are combined with the effects of other policies or proposals provided for or coordinated by the Local Development Document (internally) the cumulative effects would be likely to be significant.
D2	Options, policies or proposals that alone would not be likely to have significant effects but if their effects are combined with the effects of other plans and projects and possibly the effects of other developments provided for in the Local Development Document as well, the combined effects are likely to be significant.
D3	Options or proposals that are, or could be, part of a programme or sequence of development delivered over a period, where the implementation of the early stages would not have a significant effect on European sites, but which would dictate the nature, scale, duration, location, timing of the whole project, the later stages of which could have adverse effects on such sites.

Publication Draft Core Strategy Policies	Assessment Category	Commentary
Policy CS1: Regenerating Medway	C4	The policy identifies locations for development but does not provide any detail on the quantum of development.
Policy CS2: Quality and Sustainable Design	A1	Policy will not lead to development itself.
Policy CS3: Mitigation and Adaptation to Climate Change	A1	Policy will not lead to development itself.
Policy CS4: Energy Efficiency and Renewable Energy	C4	The policy requires that for all new developments of 10 dwellings or more, or over 1,000 sq m of floor space 20% of the remaining on-site energy loading will be delivered from renewable energy sources. It also promotes the development of large scale district heating schemes that utilise waste heat from conventional power generation.
Policy CS5: Development and Flood Risk	D2	Potential for flood risk management development to act in combination with other plans, programmes and projects.
Policy CS6: Preservation and Enhancement of Natural Assets	A3	Policy intends to protect and enhance biodiversity.
Policy CS7: Countryside and Landscape	D2	The policy permits development in the countryside depending on a number of criteria.
Policy CS8: Open Space, Green Grid and Public Realm	D2	Part of the policy seeks to improve access to the coastal areas of Medway.
Policy CS9: Health and Social Infrastructure	B	The policy permits the development of health and social infrastructure.
Policy CS10: Sport and Recreation	B	The policy seeks to safeguard and extend existing sport facilities and to continue developing a strategy to maximise local benefits of the London Olympics in 2012.
Policy CS11: Culture and Leisure	D2	Policy supports the implementation of Medway's Cultural Strategy, which includes the development of new cultural venues centered on Chatham and extending along the Medway waterfront.
Policy CS12: Heritage Assets	B	Policy seeks to preserve and enhance the historic environment.
Policy CS13: Housing Provision and Distribution	C2 & D2	The policy makes provision for at least 17,930 new homes to be delivered between 2006 and 2028 (average of 815 per year). This includes provision for 5,000 dwellings at the strategic allocation of Lodge Hill.
Policy CS14: Affordable Housing	A1	Policy sets criteria for the provision of affordable housing and will not lead to development itself.

Publication Draft Core Strategy Policies	Assessment Category	Commentary
Policy CS15: Housing Design and Other Housing Requirements	A1	Policy sets criteria for housing design and will not lead to development itself.
Policy CS16: Gypsies, Travellers and Travelling Showpeople	C4	The policy seeks to provide sufficient sites for Gypsy, Traveller and Travelling Showpeople pitches to be allocated within the Allocations and Development Management DPD
Policy CS17: Economic Development	C2 & D2	The policy makes provision for a supply of around 935,995 sq m of employment floorspace to be delivered up to 2028.
Policy CS18: Tourism	C2 & D2	Policy seeks to positively promote sustainable tourism development this includes development of the leisure use of the river.
Policy CS19: Retail and Town Centres	D2	Policy makes provision for retail development, predominantly in Chatham.
Policy CS20: Education and Personal Development	A1	Policy seeks to improve the Medway's educational offer.
Policy CS21: Conventional Energy Generation	C4	Policy supports proposals for additional power generation and energy storage capacity on the Hoo Peninsula and the Isle of Grain.
Policy CS22: Provision for Minerals	C2 & D2	The policy makes provision for the extraction of at least 0.18 million tonnes per annum of land won aggregates within the area identified to the east of Hoo St. Werburgh, together with at least a 7 year land bank of permitted reserves in the areas of search identified on the Hoo Peninsula over the plan period.
Policy CS23: Waste Management	C2 & D2	The policy makes provision for the collection, reuse. Recycling, treatment and disposal of Medway's waste. The policy identifies potential areas for disposal to land on the Hoo Peninsula and the Isle of Grain.
Policy CS24: Transport and Movement	C2 & D2	The policy seeks to extend walking and cycling networks and safeguard a network of piers and landing places in order to facilitate the introduction of water bus/taxi services along the urban waterfront, linking visitor and other attractions and providing capacity for visiting vessels.
Policy CS25: The River Medway	C2 & D2	The policy promotes mixed use development along the urban waterfront as well as a riverside walk and cycle way and increased public access to the river. It also promotes greater use of the river. Existing infrastructure that provides access to the river will be protected and new facilities, including piers for river taxis will be encouraged. Leisure activities on and along the river are also supported as long as they will not harm the environment or natural ecosystems.
Policy CS26: Strood	C2 & D2	Policy promotes housing and mixed use developments, which includes the

Publication Draft Core Strategy Policies	Assessment Category	Commentary
		provision of 2,331 new dwellings, 38,435 sq m of employment floorspace and 27,520 sq m of retail floorspace in Strood.
Policy CS27: Rochester	C2 & D2	Policy promotes housing and mixed use developments, which includes the provision of 3,117 new dwellings, 26,338 sq m of employment floorspace and 10,075 sq m of retail floorspace in Rochester.
Policy CS28: Chatham	C2 & D2	Policy promotes the redevelopment of Chatham, which includes the provision of 3,843 new dwellings, 56,590 sq m of employment floorspace and 90,790 sq m of retail floorspace in Chatham.
Policy CS29: Gillingham	C2 & D2	Policy promotes housing and mixed use developments, which includes the provision of 1,488 new dwellings, 19,221 sq m of employment floorspace and 8,384 sq m of retail floorspace in Gillingham.
Policy CS30: Rainham	C2 & D2	Policy promotes housing and mixed use developments, which includes the provision of 123 new dwellings, 14,132 sq m of employment floorspace and 5,483 sq m of retail floorspace in Rainham.
Policy CS31: Hoo Peninsula and the Isle of Grain	C2 & D2	Policy promotes housing and mixed use developments, which includes the provision of 5,522 new dwellings, 712,294 sq m of employment floorspace and 5,161 sq m of retail floorspace in Hoo Peninsula and Isle of Grain.
Policy CS32: Medway Valley	C2 & D2	Policy promotes housing and mixed use developments, which includes the provision of 548 new dwellings, 3,660 sq m of employment floorspace and 700 sq m of retail floorspace in Medway Valley.
Policy CS33: Lodge Hill	C2 & D2	Provision of 5,000 new dwellings, employment opportunities generally in balance with the resident population working age and 5,000 sq m of retail floorspace in Lodge Hill.
Policy CS34: Implementation of the Core Strategy	A1	Policy sets out measures to ensure the effective implementation of the Core Strategy.
Policy CS35: Developer Contribution	A1	Policy sets out criteria for developer contributions.

Appendix 4: Medway Core Strategy HRA Meeting Minutes

Project:	Medway Council Core Strategy HRA
Date:	29 th June 2011
Time:	12.15- 1.15
Venue:	Canterbury Council Offices
Attendance:	Toney Hallahan - Enfusion Alastair Peattie - Enfusion Brian McCutcheon – Medway Council Charlotte Hardy – Medway Council Andrea Wright- Gravesham Borough Council Nigel Jennings- Natural England Francis Davies- Natural England Sophie Flax- RSPB Debbie Salmon-Kent Wildlife Trust Martin Hall- Greening the Gateway Kent &Medway Apologies- Swale Borough Council, Environment Agency

1. Introduction

- Toney explained purpose of meeting: updating NKEPG on HRA findings to date, discussing early ideas for mitigation, considering the findings/implications of the Footprint study.

Medway Core Strategy- progress to date

- Brian discussed progress to date on the Medway Core Strategy- next consultation on Pre-publication draft taking place in September 2011. Council working in an open and transparent way on the strategy and also with the HRA/SA work. A draft of the Core Strategy will be completed 15 July for 2 August Cabinet Meeting.

Core Strategy HRA Progress

- Alastair discussed HRA progress to date: draft working paper prepared for Council and sent to Natural England; agreed to circulate this to wider group by week's end.

2. Discussion of the issues/mitigations/early findings:

- Alastair provided a summary of the key issues identified to date and discussion was held around early findings and possible mitigations (list of proposed mitigations circulated).

Air Quality

- A number of the European sites are within 200m of a major road that could see a significant increase in traffic as a result of development proposed in the Core Strategy and surrounding areas.
- KWT discussed concerns around cumulative effects across the Gateway, especially in relation to nitrogen deposition.

Habitat loss/fragmentation

- Role of group in helping identifying important supporting habitats.
- Discussed Thames Estuary 2100 proposals for habitat replacement within Medway boundaries.
- Role of greenspace and green grid discussed.

Water levels/quality

- Review of consents process will help identify if any problems. Early findings suggest new Core Strategy policy on water resources/ quality required. This reflects comments from other stakeholders- Council Officers support this and suggest it could be linked to Southern Water's business plan targets.

Disturbance

- This is the key significant issue for the Core Strategy. Enfusion have been awaiting results of the Footprint study before doing further work. This issue will be carried into the Appropriate Assessment stage of the work. Discussed the importance of taking a precautionary approach to this.
- Findings of Footprint study to date are showing that a local element is exacerbating the national picture of bird decline; a correlation between dog-walking and the disturbance of birds has been shown through the study; also that most visitors to the estuary are local to Medway.
- Discussed use of SANGS (Strategic Alternative Natural Greenspace). Debbie commented that this would not be sufficient, that appropriate management actions will also be required at a European site level.
- Discussion around Community Infrastructure Levy (CIL) and whether it is possible to obtain develop contributions to support management of habitat sites- Brian suggested this is something the Council could look into.
- Agreed that given timescales and the need for ongoing work on the issue (Stage 2 of Footprint work due October, may not be ready to inform Medway draft submission document), a precautionary approach will need to be taken to the disturbance issues.
- Discussed possible wording: it should include a precautionary approach, recognise the probability of increased disturbance as a result of development and the need to mitigate this. That SANGS and active management will be required. That should future work find evidence of developments contribution to the decline, that developments may be required to provide a contribution towards management of the issue.
- Enfusion to draft policy wording and circulate to the group for comments.
- Natural England discussed need to consider disturbance on other species, e.g. invertebrates.

3. Next steps

- Enfusion to send HRA working paper to the group for comments- to include the current list of draft mitigations-any comments welcome. Actioned.
- Enfusion to draft policy wording on disturbance and circulate to the group for comments. Actioned.
- Group asked to think about and forward any relevant studies/information to Alastair at Enfusion; also any comments on Draft HRA Working paper: alastair.peattie@enfusion.co.uk
- HRA Screening report under preparation, and will send consultation version to the NKEPG group.
- HRA Appropriate Assessment will be prepared September/October to accompany draft Submission Core Strategy.

Appendix 5: Consultation Commentary

Publication Draft Core Strategy: HRA Screening Report

Respondent	Summarised Comment	Response
Natural England Nigel Jennings 14 October 20011	Much to be applauded with policies covering climate change, biodiversity, landscape and green infrastructure. Notes that a Screening Report has been submitted that has identified a need for a Stage 2 Appropriate Assessment. However states that it is a disappointing that a full Habitats Regulations Assessment did not accompany the draft Publication Core Strategy. This is not sufficient as the HRA process should be in tandem with the Core Strategy.	Concerns noted, however the HRA process has been carried out in tandem with the policy development and has influenced the Publication Draft Core Strategy. An HRA Working paper was presented to Natural England and the North Kent Environment and Planning Group (NKEPG) at a meeting on 29 June 2011 and shortly thereafter forwarded by email. This paper included proposed mitigations that were discussed at that meeting and that subsequently informed the development of the Core Strategy, including revised policy text for policy CS6: Preservation and Enhancement of Natural Assets and more stringent targets for energy efficiency in Policy CS3. At that meeting it was discussed that work on the HRA would be ongoing, however that the Stage 2 HRA Report itself was dependent on forthcoming information (including the final North Kent Bird Report, published September 2011), and therefore the Stage 2 report would be published later in 2011.

	The following comments relate to Policies: CS1, CS4, CS7, CS13, CS16, CS17, CS18, CS19, CS21, CS22, CS24, CS25, CS26-CS32, CS 3. Until an HRA has been prepared and assessed the impacts of these policies is unknown. NE's support is dependent on the outcome of the full HRA and any changes that may be recommended in accordance with the Conservation of Habitats and Species Regulations.	Noted, however, as noted above, work has been ongoing to consider the impacts of these policies and to develop mitigations. The current Stage 2 Appropriate Assessment report should be referred to for further information.
	Policy CS8: Note that under para 4.89 it is a key aim to open up access to the marshes bordering the Thames and Medway- potential negative effects should be explored in HRA- this policy should be screened-in.	Noted and agreed. Policy has been screened-in to the Stage 2 Appropriate Assessment.
	Policy CS22: Provision for minerals: Potential for adverse impacts from air pollution, noise and water quality on European sites- specific reference to Figure 7.1 on safeguarding.	Noted. Further consideration given to this policy in this Stage 2 Appropriate Assessment.
	Policy CS33: Lodge Hill. In addition to requiring further consideration in Core Strategy HRA, also mention the need for a separate HRA of the Development Brief as the HRA of the Core Strategy will not have the detailed information that will be needed to assess all impacts.	Noted. However an HRA of the Development Brief is not formally required unless it is adopted as SPD. Medway Council are aware of the concerns raised by NE, however notes that a Project-level HRA is being undertaken by the proponents for the development of Lodge Hill and will shortly be submitted. This document will cover the detailed information required by NE- to require an HRA of the Development brief will only result duplication.

RSPB Sophie Flax 12 October 2011	Have reviewed recommendations emerging from the HRA Screening report and are concerned that a full HRA report has not been made available at the draft strategy consultation. Without this the level of impact on European sites cannot be determined and compliance with the Habitats Regulations cannot be demonstrated. Specifically object to the following policies as they may have an impact on designated site network and have not been assessed as part of a full HRA. Policies CS1, 5,8,13,17,21,22,23,25,33. The RSPBs response includes further detailed information relating to potential impacts of these policies on European sites.	Noted. Refer to response to Natural England comments on page 1. As above. Refer to response to Natural England comments on page 1. Detailed comments provided by the RSPB in relation to these policies have been referred to in undertaking the HRA.
	CS1: Once the detailed location of riverside regeneration sites is known these should be thoroughly assessed in the AA to the forthcoming DPDs. Concerned that number and scale of developments on the River Medway, including from land/water-based recreational activities is likely to have a negative effect. CS5: Development and Flood risk. Object to policy, as there is the potential for flood risk management to impact on European sites, so policy should be subject to AA.	Concerns noted- this is addressed in the Stage 2 AA report. Noted, this policy has been screened in to the AA, and is considered under habitat loss and fragmentation. However it is noted that any flood defences plans and policies will be also be subject to plan and project-level HRA.

	CS6: Preservation & Enhancement of Natural assets The RSPB objects to this policy. While the wording in this policy is very strong and there is much of it which has the support of the RSPB, unfortunately the protection it affords European sites is not sufficient. RSPB welcome the commitment to implementing the findings of the visitor and bird and disturbance study commissioned by NKEPG. The commitment to ensuring "that any proposed strategic avoidance and/or mitigation measures are <u>considered</u> in all planning documents and in the assessment of planning applications" should be strengthened, so that it proposed <u>strategic avoidance and mitigation measures are implemented.</u> We welcome the strengthening of the wording of this policy since the previous iteration of the Core Strategy, so that opportunities for replacement or enhancement of habitat will be "pursued and secured" either directly or by obtaining contributions to the strategic provision of natural open space. We welcome the inclusion of the principle that "such strategies should be in place and functioning prior to commencement of the development." In addition, we welcome the commitment to "normally" providing compensation on more than a like-for-like basis, however <u>this statement could be strengthened by adding "unless it can be shown there will be no impact on biodiversity."</u>	Comments noted. The Stage 2 AA report proposes a stronger approach to the protection of European sites within this policy. Noted. Noted and agreed. HRA suggests amending considered to 'adopted'. Noted, however it is felt that the policy text as presented is clear.

	CS6: Although European sites are separately protected by European Habitat Regulations we do not agree that the protection of the Natural 2000 network "does not require specific policies in local development frameworks." (CS 4.53) We must object to this policy since it does not afford sufficient protection to European sites. Policies in the Draft Strategy (for example CS13 Housing Provision and Distribution) have the potential to contribute to and exacerbate recreational disturbance on SPA/Ramsar sites however this is not addressed through Policy CS6. We recognise that Medway Council is committed to address this matter, through its involvement in the North Kent Environmental Planning Group, and we welcome the commitment to implementing the findings of this group in CS6. However, given the scope and complexity of this issue we recommend the inclusion of a separate policy to detail how Medway Council intends to address this, to include recreation impacts on SAC and Ramsar designated sites as well as SPAs. Policy should consider the following: • Since baseline evidence is not yet available to determine the true impact of recreational disturbance on the Natural 2000 and Ramsar Network a precautionary approach to be taken until the study is concluded so that any application for development which is likely to have a significant effect on the Natura 2000 and Ramsar network will require a Habitats Regulations Assessment under the Habitats Regulations 2010. • A condition should be attached to any permission granted to ensure that if studies show that impacts are thought to be greater than those identified within the original HRA additional mitigation will be implemented.	Noted. The HRA supports a stronger approach to European site protection. The HRA is recommending changes to Policy CS6 to address these concerns. The HRA is recommending changes to Policy CS6 to address these concerns.

	• If studies show an adverse impact is likely, either a core strategy review or a development plan document will be required to incorporate the findings of the studies so that the plan can be updated in light of subsequent information. • NKPEG have commissioned initial research to assess the causes of the bird declines. Medway Council is committed to working with its partners through NKPEG to develop a strategic approach to protecting European sites and to identify sufficient, appropriate and proportionate mitigation measures. • A flexible approach to housing numbers should be established in this plan so that it can be applicable in light of emerging evidence. Mitigation and avoidance measures such as wardening, access management, green infrastructure and a co-ordinated developer-funded approach might be needed. • Consideration of these issues should not be left until application stage but considered at a strategic level as part of a development plan document once the evidence base is complete. Developments coming forward in the near future should be dealt with on a case by case basis, based on the best available evidence until the result of this study have come forward. All development coming forward should have regard to this policy.	

	CS8: Open Space, Green grid and public realm The HRA has screened this policy out, however we strongly recommend this matter be thoroughly appraised in the AA of the Core Strategy, and mitigation measures such as access management considered. CS33: Lodge Hill The RSPB objects to this policy. The impacts of this policy on European sites and nearby SSSIs have not been fully assessed, and appropriate avoidance and mitigation or compensation measures have not been incorporated into the document.	Noted, the policy has been screened-in to the Stage 2 AA. Noted, this policy has been screened in to the AA and further information provided to support the assessment.
Friends of the North Kent Marshes	Concerned that a full HRA report has not been made available at the draft strategy consultation. Specifically object to the following policies as they may have an impact on designated site network and have not been assessed as part of a full HRA. Policies CS1, 5,8,13,17,21,22,23,25,33. The FoNKM response includes further detailed information relating to the potential impacts of these policies on European sites. Object to Policy CS 1: Once the detailed location of the riverside regeneration sites are available this should be thoroughly assessed in the AA to the forthcoming DPDs. Concerned that the number and scale of developments on the banks of the river Medway, including from land and/or water-based recreational activities, is likely to have a negative impact on the Medway Estuary and Marshes SPA/Ramsar site.	Noted. Refer to response to Natural England comments on page 1. As above. Refer to response to Natural England comments on page 1. Detailed comments provided by the FoNKM in relation to these policies have been referred to in undertaking the HRA. Concerns noted- this is addressed in the Stage 2 AA report.

	CS5: Development and Flood risk. Object to policy, as there is the potential for flood risk management to impact on European sites, so policy should be subject to AA.	Noted, this policy has been screened in to the AA, and is considered under habitat loss and fragmentation. However it is noted that any flood defences plans and policies will be also be subject to plan and project-level HRA.
	CS6: Preservation & Enhancement of Natural assets Object to this policy. While the wording in this policy is very strong and there is much of it which to support, unfortunately the protection it affords European sites is not sufficient.	Comments noted. The Stage 2 Screening report proposes a stronger approach to the protection of European sites within this policy.
	CS8: Open Space, Green grid and public realm The HRA has screened this policy out, however strongly recommend this matter be thoroughly appraised in the AA.	Noted, the policy has been screened in to the Stage 2 Appropriate Assessment.
Kent Wildlife Trust 14 October 2011 Debbie Salmon	Due to the lack of a full Habitats Regulations Assessment there is no evidence that all individual and in-combination impacts on the Natura 2000 and Ramsar network have been considered in the formulation the Core Strategy policies. As no HRA has informed the policies the protection measures only consider the issue of recreational pressure on the bird populations. Even in this respect, it is our view that the measures proposed do not fully protect the SPAs from in-combination impacts.	Noted. Refer to response to Natural England comments on page 1.
	Due to the lack of a HRA there is no assessment in regard to hydrological and pollution impacts and direct land take on the Ramsar Network within the Thames Gateway.	Disagree. The HRA process has informed the plan-making process as detailed in the response to Natural England comments on page 1.
	Due to the lack of a HRA no assessment has been made in regard to the possible recreational and air quality impacts on the North Downs Woodlands SAC from the increased population and the increase road use and emissions in the locality of the SAC.	Noted. Refer to response to Natural England comments on page 1. Hydrological, pollution and direct land take matters are discussed in the current HRA report.
		Concerns noted. The North Downs Woodlands SAC has now been scoped into the Appropriate Assessment- refer to section 4 of the report for more detail. However concerns relating to eutrophication from dog fouling are not considered to warrant further investigation due to the distance of the SAC from the new development.

	Object to the following policies as they may have an impact on designated site network and have not been assessed as part of a full HRA: policies CS1, 5,6,13,17,18,21,22,23,24,25,26,27,28,29,31,32,33. KWT response includes further detailed information relating to potential impacts of these policies on European sites.	Refer to response to Natural England comments on page 1. Detailed comments provided by KWT in relation to these policies have been referred to in undertaking the HRA.
	CS 1: The HRA scoping report identifies that Policy CS1 could have an impact on the European network in its own right. Kent Wildlife Trust would also wish to see in-combination impacts assessed within the HRA. Concerned that number and scale of developments on the River Medway, including from land/water-based recreational activities is likely to have a negative effect.	Concerns noted- this is addressed in the Stage 2 AA report.
	CS5: Development and Flood risk. Object to policy, as there is the potential for flood risk management to impact on European sites, so policy should be subject to AA.	Noted, this policy has been screened in to the AA, and is considered under habitat loss and fragmentation. However it is noted that any flood defences plans and policies will be also be subject to plan and project-level HRA.

	CS 6: Concerns regarding the lack of protection for European sites. Once a complete evidence base is available, resilient measures should be incorporated into either a Core Strategy review, or future DPD policies. It is imperative that the avoidance, mitigation and compensation measures are included within DPD policy - recommend this be clearly stated within clause 2. A clause is required both within Core Strategy policy and as a condition of any planning permission granted to ensure that, should evidence become available that there is a significant ecological impact over and above that assessed and mitigated within the application process, for sites already granted permission or those gaining planning permission before research is completed, it must be fully mitigated by the developer. Welcome the protection incorporated into the policy for atmospheric light and noise pollution. However, there is no policy to protect the Natura 2000 and Ramsar network from possible hydrological and ground source pollution.	Noted. The HRA supports a stronger approach to European site protection and has made recommendations accordingly. The HRA is recommending changes to Policy CS6 to address these concerns.

	CS 13 Housing Provision and Distribution Kent Wildlife Trust disputes only one aspect of the scoping report, it being our view that the North Downs Woodlands SAC should be scoped in for further assessment in relation to recreational pressure on the chalk and woodland habitats with possible impacts of development proposed within the Core Strategy and in-combination impacts with Gravesham Borough Council and Tonbridge and Malling Borough Council being assessed.	
	CS23: Waste Management The area identified for possible landfill, although it does not appear to impact directly on the Ramsar designation, covers land immediately adjacent to the Medway Estuary and Marshes Ramsar designation and could support species for which the site is designated. Depending on the sites selected, there is also a risk that land raising and excavation related to landfill could impact on the hydrology of the Ramsar site.	Refer to section 4 of the Stage 2 AA for assessment in relation to this issue.
	Area policies CS 26- CS30 Note that many of the larger developments have been granted permission and under construction, Advice sought from NE who have clarified that if new information becomes available then a full HRA should be undertaken to assess impacts.	Noted.

	CS 33: Lodge Hill: Due to the valuable national and international sites there is a need for high ecological protection within the policy. In relation to Policy CS33 it is our view that due to the lack of a HRA for the Core Strategy there is insufficient information to ensure no impact on the designations from 5000 dwellings. Suggestion for vision for Lodge Hill: <i>It will be a distinctive place that connects to the surrounding rich countryside, with a land use pattern that minimises the need to travel. It will be an exemplar for the Thames Gateway in the way that it ~~minimises~~ ensures no impact on the internationally and nationally designated sites and ~~its~~ ~~impact~~ on the environment, enhances and extends biodiversity on site providing a net gain and provides for an excellent quality of life for all its residents.</i> Development Principles For the third principal with paragraph 10.105, recommend that the following wording be added. <i>Environmentally sensitive – design, infrastructure, delivery and management both on site and within or adjacent to the internationally and nationally designated sites to be impacted will that respect and enhance and extend the natural environment, conserve natural resources and support people to lead sustainable lifestyles</i> Suggested additions: - Appropriate avoidance mitigation and compensation measures for the Natura 2000 and Ramsar network which will be informed by the conclusions of a comprehensive Habitats Regulations Assessment which will examine the individual and in-combination impacts of the development	Noted and refer to response to Natural England on page 1 of this appendix. Lodge Hill has been considered in the stage 2 AA and recommendations are include in section 4 of the AA report. Suggestion: If adopting this recommendation the Council should change 'no adverse impact' to 'no significant adverse impact'.
		Noted and supported.
		Noted and supported.

	Off site <i>The land take for mitigation for impacts on the SSSI and biodiversity more widely is likely to be in excess of 100ha.</i> <i>Within or adjacent to the Natura 2000 and Ramsar network</i> <i>Avoidance, mitigation and compensation measures will be provided to alleviate any direct or indirect impacts found within the HRA.</i>	Noted and supported.

SUMMARY SCHEDULE OF REPRESENTATIONS RECEIVED ON PUBLICATION DRAFT CORE STRATEGY

No.	Representor	Summary
1	Accelor Mittal	Seeks stronger safeguarding for Chatham Docks
2	Arriva	Seeks stronger references to buses
3	BAe Systems	Seeks slightly more flexible policy for cluster development at Rochester Airport; continues to seek mixed use redevelopment of sports ground at Hoo
4	Barratt Strategic	Proposes housing target of 978 (as opposed to 815); undue reliance on Lodge Hill; proposes a 'greater Hoo' option, including development at Walnut Tree Farm, High Halstow
5	Berkeley First	Detailed concerns over introduction of Sustainable Homes Code, on-site renewable energy provision and internal space standards
6	Borough Green Developments	Appears to seek further retail development at Bredgar Road, Gillingham
7	Bourne Leisure	Advocates leisure development at Allhallows
8	Brett Group	Seeks stronger safeguarding for operations at Cliffe
9	Chatham World Heritage	Generally supportive but wants WHS plan to include buffer zone
10	Church Commissioners	Number of detailed comments but primarily seeking a more flexible development boundary around Lodge Hill
11	Jehovah's Witnesses	Support
12	Cliffe & Cliffe Woods PC	Housing development should be contingent on the provision of infrastructure and services; concern over possible effects of NPPF and transport impact of Lodge Hill
13	Countryside Properties	Considers new residential design standards too rigid
14	CPRE Protect Kent	Very detailed representations essentially concerned with protection of the environment
15	Dakers Marriott	Expresses views on the regeneration of Strood and Chatham town centres
16	Harry Deakin/Brian Kingsley Smith	Challenges basis for economic policies and overall strategy
17	Dickens Country Protection Society	Similar to Cliffe and Cliffe Woods PC (see above)
18	Enderson, Bob	Suggests possible contradictions between evidence base and policy
19	Environment Agency	Supports a large number of policies and suggest minor wording changes;

No.	Representor	Summary
		Concerned there is no clear mention of how derelict/brownfield sites with historic contamination will be addressed – propose wording to be included
20	Ferrett - DHA	Raises questions over deliverability of strategy and therefore consider that there should be other strategic Greenfield sites included as well; Consider viability required for number of areas to be able to ensure development is not hindered; Feels that for CS30: Rainham, to be viable, there should be consideration of more strategic sites within and on the edge of the centre
21	Friends of North Kent Marshes	Various issues raised due to a full HRA not being available with consultation; mention potential recreational disturbance and recognition of importance of agricultural land
22	Gillingham Football Club	Consider unsound for not recognising importance of Club. Raise issues with number of policies. Wish for some specific wording to be included referencing development of club
23	Goodmans – Barton Willmore	Consider the policies in relation to Kingsnorth are too prescriptive
24	Graham Simpkin Planning for Residential Marine	Consider inaccuracies in the text, such as not accurately reflecting levels of houseboats, omission of marinas. Consider exception sites need to be included in CS14 Feel food production, horticulture and agriculture have been undervalued
25	Helvig	Consider economic strategy (especially retail and transport) to be too based on small number of large sites. Consider little prescription over strategy; timely delivery of traffic infrastructure supporting growth Question the level of jobs being mentioned and achieving the high level compared to neighbours Mention the airfield and aspirations for it Traffic issues around the towns
26	High Halstow PC	Concerns over the A228 due to increase across Peninsula – business at Kingsnorth and Grain and effects on Four Elms
27	Highways Agency	Number of detailed points on Rochester Airfield Brief – demand management; LTP3 and discussion of term ‘strategic road network’. Require more detail of capacity assessments of the roads across Medway – need to show the growth can be accommodated; Park and Rides – wish more evidence in relation to these;

No.	Representor	Summary
		Concern over the level of employment floorspace at Lodge Hill creating in-commuting; Wish an addition in the Infrastructure Schedule to allow flexibility over any HA based schemes
28	Hoo St Werburgh PC	Main issue is Lodge Hill, with some other comments on Climate Change
29	Jones, Ballard, Page & Wells	Issues with Lodge Hill, part of the area near the access – seeking additional development
30	KCC	Suggestion of minor wording changes and references to studies which may be of use but no major concerns
31	Kent Architecture Centre	Minor issues in terms of wording – reference to Design reviews
32	Kent Downs	Minor wording issues and studies mentioned to strengthen protection for buildings in the countryside
33	Kent Wildlife Trust	Discuss a number of specific issues, due to no full HRA with consultation, however meeting arranged now draft report issued
34	Kingsley-Smith (Ivan)	Consider that the Medway Valley policy needs to include mention of other sites beside the Former Cement Works
35	LaFarge	Minor technical corrections, but wish to have mention and recognition of mineral safeguarding areas
36	CBRE for Land Securities	Want mention of Lodge Hill in CS1; Wish greater flexibility to be added into a number of policies considered as being too prescriptive and consider that some are not local enough; Discussion of housing figures with SLAA, as well as employment and retail quantum for site; Some minor suggestions over wording
37	Marine Management Organisation	Support the document, consider it will form a valuable part of the SE Marine Plan when done; Wish to see mention of the Marine and Coastal Access Act and its Medway implications
38	McCarthy and Stone Retirement Lifestyles	Considers there needs to be a much higher profile for the needs of the ageing population, especially with respect to housing and care - it should be pro-actively planned for; wish for there to be a separate policy for Older People's housing
39	McCulloch Homes – Peter Court	Issues both in terms of the overall housing employment strategies, especially in terms of focusing on development in the existing urban area
40	Medway Countryside Forum	Wish Motney Reedbed and Saltings to be included in the list of LNRs the Council intend to designate; Oppose the lose of ALLIs, contest whether the

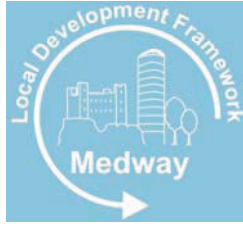
No.	Representor	Summary
		Landscape Character Assessment is adequate and say the Council are not maintaining protection of these areas; Consider that the amount of housing quoted in the housing policy is excessive and cannot be achieved and is not sustainable as it believes it will have spill over impacts in the urban area
41	Medway Magna – Graham Warren	Consider the 815pa to be optimistic and an over reliance on provision from regeneration sites; Raise questions over the deliverability of Lodge Hill; Feel the evidence base needs to show how out-commuting will be achieved and do not consider that Kingsnorth and Grain will produce the required level of jobs; Argue that a Southern Relief Road will help remove local traffic from Junction 3, as well as removing the need to go through Chatham Town Centre
42	PCT	References number of comments about doc but none received
43	Medway Sport and Leisure	Considers the Council should have a reference to acceptance that Gillingham FC require a new stadium and therefore reword a number of policies
44	Medway Urban Parks and Green Spaces Forum	Refers to previous comments submitted at earlier stages
45	Mercer – Penshurst Planning	Consider that CS13 should make provision for a wider variety of sites, being over dependent on large strategic sites; Feel the right type of housing needs to be located in the right locations; Considers there needs to be more 'executive style' housing and more middle to upper market lower density housing to come forward, therefore requiring greater flexibility; Wish greater flexibility to be within policies CS7 & 8
46	Mineral Products Association	Policy CS22 does not provide for safeguarding of mineral resources or set out what safeguarding will entail
47	Trustees of Hempstead Valley	Feel the CS should set out a balanced and flexible retail and town centre strategy that can be delivered; Consider the amount set out in policy CS19 is over that quoted by the Retail Study; Consider it vital that the retail strategy also addresses the first 5yrs of the plan period (2011-16); Think that the strategy needs to be more flexible;

No.	Representor	Summary
		The Council should give more consideration to greater level of investment at Hempstead Valley; Believe that policy CS30: Rainham should be more flexible
48	Morrisons – Peacock & Smith	Require flexibility to wording of CS3 climate change
49	Narrainen, Clive	Finds CS3 climate change sound
50	National Grid	3.21 e – should not be limited to environmental technologies, Require flexibility to wording of CS3 climate change Finds CS17, CS21, Economic Development table sound (ED and conventional energy generation matters)
51	Natural England	Suggest minor changes across all general themes, however most concerned about lack of evidence on European Sites – re Habitat Regulations
52	New Homes & Land DHA	CS19 and CS30 relating to retailing – generally supportive, but requires an amendment to improve delivery potential
53	Open Space Society	CS24 transport & movement needs more consideration with conflicting uses, Generally support CS8 & CS28 open space, green grid public realm and Chatham regeneration, although needs to be made more effective
54	Parker, Vivienne	Suggests minor corrections relating to Civic Centre Strood, Dockside Outlet Chatham and Horsted College
55	Port Medway Marina (Anna Bloomfield)	Suggests changes to a number policies to protect and improve Medway Marina, Cuxton
56	Rochester Airport Consultative Committee	CS12, CS17, CS24 should give greater protection to the future of Rochester Airfield and its modernisation, plus recognition of its important heritage
57	Rochester Airport Ltd	CS12, CS17, CS24 should give greater protection to the future of Rochester Airfield and its modernisation, plus recognition of its important heritage
58	Rochester Bridge Trust	CS1 more emphasis on social regeneration to be included. CS7 agricultural land needs stronger protection from large-scale development. Emerging new national planning framework should be acknowledged
59	Rochester Bridgewood (Peter Court)	Issues relating in depth to a number of policies particularly employment and housing. More weight to be given to emerging planning framework. Land at Bridgewood for employment development opportunity

No.	Representor	Summary
60	Ropemaker Properties Ltd	CS19 retailing, suggests that the policy is not consistent with national guidance PPS4 and should be reworded. CS26 relating to Strood suggests improvements to the centre, but these are not specified in the policy
61	Royal Mail – BNP Paribas	Suggests that the CS does not comply with the requirements of PPS12. CS17 does not provide for sites no longer suitable for employment to come forward for alternative uses
62	RSPB	Core Strategy needs to include a full Habitat Regulation Assessment
63	Sounding Board Properties - DHA	Relates to a number of policies, generally asks for further examination of PDL sites and open space designations. In particular the quarry site at Commissioners Road Strood
64	South East Marine Association	River issues - should not support the closure of wharves, supports the safeguard of Chatham Docks, and wants to encourage more residential moorings
65	South East Water Ltd	Supports CS3 climate change
66	Southern Water	Concerns over lack of protection of water resources from waste and minerals. Area policies text amendment to include adequate infrastructure. New developments need to be protected from waste water treatment plants
67	Sport England	Major concern with the age and robustness of the evidence base, in particular to playing pitches. Also suggests wording changes
68	Strood Town Centre Forum (Dakers Marriott)	Issues around Strood Town Centre – masterplan needs updating, retailing issues, traffic management/circulation problems. Policy C31 Hoo Peninsula and CS33 Lodge Hill need to be linked
69	The Peel Group - NLP	Feel that the Core Strategy should be more positive to safeguard Chatham Docks. The policy should be worded to include rationalisation and regeneration of the Docks
70	The Theatres Trust	Supports CS11 Culture and Leisure
71	Tonbridge & Malling BC	Minor amendments to maps. Reference to technology cluster at Rochester Airport may have an impact on traffic generation
72	Trenport Investments Ltd	Concerns over housing targets not being achieved, too much reliance on Lodge Hill, would like to put forward land at Cliffe to meet shortfall. Would like to encourage small employment sites. Core Strategy should state that it supports the proposed river crossing at Medway Valley.

No.	Representor	Summary
73	Viewrun Ltd - DHA	Suggested wording changes to CS29 – Gillingham regarding landscape and recreational improvements
74	Frindsbury Extra Parish Council	Support a number of issues. Have raised concerns over demand on water resources, wind turbines, flood protection, traffic generation resulting from Lodge Hill, increase in the amount of affordable housing provision fro 25% to 30% and developer contributions
75	Frindsbury & Wainscott Community Association	General concerns over infrastructure provision. Issues over amount of development at Lodge Hill. Not enough protection for land not covered by National policies and concern over Hogmarsh Valley. Higher design standards required.

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Medway Local Development Framework:

Core Strategy

Diversity Impact Assessment

December 2011



Contents

- 1. Medway Council's approach to the LDF and Diversity Impact assessment**
- 2. Medway Council's approach to the LDF and Initial Screening of Policy**
- 3. Collection of Data and the Issues and Options Report**
- 4. Policy Formulation**
- 5. Pre-Publication Draft Core Strategy (PPDCS)**
- 6. Publication Draft Core Strategy**
- 7. Submission Draft Core Strategy**
- 8. Diversity Impact Assessment: Screening Form**

1. Medway Council's approach to the LDF and Diversity Impact Assessment.

- 1.1 The Race Relations (Amendment) Act 2000 introduced a requirement to conduct race impact assessments. By law all policies and major service changes that could have an impact on black and minority ethnic (BME) groups need to be assessed.
- 1.2 Since then, similar statutory duties have been introduced in relation to disability and gender and the potential barriers to people having fair access to council services or employment.
- 1.3 The legal duties on local authorities currently cover race, disability and gender only. However, the Diversity Impact Assessment (DIA) process at Medway Council has been designed so that it can consider other groups in the same way. Medway will identify impacts for customers due not only to their racial/ethnic group but, also, to their gender, or disability and asks about possible discrimination due to sexual orientation, age, religious belief and other factors.
- 1.4 The Core Strategy is the key document in the Local Development Framework (LDF) as it sets out the overall vision and strategy for place making and will provide the context for all subsequent Development Plan Documents and their policies. It sets out what Medway wants to achieve in different parts of the area to 2028 and how it will get there.
- 1.5 The information used to inform the Core Strategy is formed from two key elements, participation and studies. These are collectively referred to as the evidence base. This has included a number of background studies, community consultations, working with the Medway Local Strategic Partnership, community groups and developers and agents.
- 1.6 The views of the local community and others who have a stake in the future of the area have helped influence the spatial strategy and vision set out in the Core Strategy, particularly through the Medway Sustainable Community Strategy¹ (2010). To ensure that participation has been constructive, the principles of effective community engagement in planning have been followed. This has meant that at each stage during the progress of the Core Strategy engagement has been appropriate, carried out from the outset, continuous, transparent and accessible and planned as an integral part of the plan making process².
- 1.7 To help produce an Equalities Impact Assessment an additional Code of Practice has been produced by the Equality and Human Rights Commission³ that details the procedure to enable a Local Authority to carry

¹ http://www.medway.gov.uk/pdf/sustainable_com_strategy_web.pdf

² <http://www.communities.gov.uk/documents/planningandbuilding/pdf/pps12lsp.pdf>

³ http://www.equalityhumanrights.com/uploaded_files/PSD/equality_impact_assessment_guidance_quick-start_guide.pdf

out an Equalities Impact Assessment that addresses the needs of all diverse communities.

- 1.8 There are two main sections to the procedure, the first being the Screening of relevant policies and once assessed if they do have an impact on BME groups, a full assessment.

Screening

- 1.9 A screening process is used to: identify the main aims of the policy; collect information and decide if the policy is relevant. Authorities should work on the assumption that all proposed policies are relevant to the race equality duty, until it has had a chance to screen them. Any changes a local authority makes to a policy should also be screened, to see if they have implications for meeting the duty. If a policy is relevant then a full assessment should be carried out on its impact on BME groups.

2. Medway Council's approach to the LDF and Initial Screening of Policy

- 2.1 Before any policies were formed or even considered, an initial screening of issues took place in the spring of 2009. This included the following matters:

- Housing
- Retail
- Neighbourhoods and Town Centres
- Sustainability and Climate change

- 2.2 Any race/equalities relevance

At this early stage owing to the very general areas of possible policy under consideration, none of the topics could be assessed to have any direct race/equalities relevance. Nevertheless, key priorities and sustainability issues were put together using a range of research, strategy and policy documents. These are set out in Table 2 of the Medway Sustainability Appraisal Scoping Report (2008)⁴. This document was taken to the Advisory group of the Local Strategic Partnership who confirmed that subject to a few minor amendments, the Scoping report could go out to consultation to the bodies listed in government planning guidance on plan making (originally defined in Annex E1 of PPS12⁵). In the Scoping Report a number of key national policy documents were considered that relate to equalities and diversity matters. These included:

PPG3 (Housing): Meeting the housing needs of the entire community; and creating mixed communities

PPG17 (Planning for Open Space Sport and Recreation): Promote Social inclusion and community cohesion.

PPS1 (Delivering Sustainable communities): Ensuring development supports existing communities.

⁴ <http://www.medway.gov.uk/pdf/sustainability%20appraisal%20scoping%20report.pdf>

⁵ Office of the Deputy Prime Minister 2004 Planning Policy Statement 12 : Local Development Frameworks <http://www.odpm.gov.uk/index.asp?id=1143847>

Sustainable Communities: Building for the Future: To ensure all social tenants have a decent home by 2010. To improve conditions for vulnerable people in private accommodation.

Securing the Future: UK Sustainable Development Strategy: Social progress that recognises the needs of everyone. Reducing the level of social exclusion.

Bringing Britain together: A national strategy for neighbourhood renewal: investing in people, not just buildings; involving communities, not parachuting in solutions; developing integrated approaches with clear leadership; ensuring mainstream policies really work for the poorest neighbourhoods.

A new commitment to neighbourhood renewal — national strategy action plan: In all the poorest neighbourhoods, to have common goals of lower worklessness and crime and better health, skills, housing and physical environment. To narrow the gap on these measures between the most deprived neighbourhoods and the rest of the country.

A full list of these documents and objectives is included in the Medway Sustainability Appraisal Scoping Report³.

3. Collection of Data and the Issues and Options Report

- 3.1 Through the collection of baseline data and examination of sustainability issues, a series of key issues were highlighted. In addition, discussions were held with external organisations and Medway Council officers to help to identify potential issues and options. These formed the basis of the Issues and Options Report⁶, which was published in July 2009 for consultation with those organisations listed within the Statement of Community Involvement (SCI)⁷. The Issues and Options Report outlined the main issues for Medway in relation to the Core Strategy and provided details of options for dealing with them. The Document contained a set of comprehensive questions addressing the main matters for consideration. In relation to community diversity and equalities matters, questions were asked about Neighbourhoods, Cultural facilities, Social Care, Affordable Housing and Regeneration.
- 3.2 The above document was also accompanied by the Initial Sustainability Appraisal Report that sought to appraise these potential options. Each strategic option was then assessed against the Sustainability Appraisal objectives.
- 3.3 A range of bodies concerned with race, gender, disability, age and religion were consulted such as:

Ahmadiyya Muslim Association	Age Concern Medway Ltd
Alzheimer's Society (Rainham (Kent) Support Group)	Apnar Ghar
Hindu Sabha	Ethnic Minority Forum

⁶ http://medway-consult.limehouse.co.uk/portal/issues_and_options_report?pointId=794820

⁷ <http://www.medway.gov.uk/pdf/SCI%20Aug%202011.pdf>

Kent Bangladesh Welfare Association	Frindsbury Hall Nursing Home
Kent Multicultural Community Association	Kent Association For Spina Bifida & Hydrocephalus
Kent Ramgarhia Darbar - Gurdwara	Kent Association For The Disabled
Kent Turkish Welfare Association	Kent Ethnic Minorities Disabilities Forum
Medway Access Group	Kent Malayalee Association
Medway Afro Caribbean Association (Gillingham)	Kent Muslim Welfare Association
Medway Arthritis Self Help	Kent Refugee Action Network
Medway Hindu Centre	Kent Youth
Medway Mencap Society	Medway Inter Faith Action
Medway Racial Equality Council	Medway Towns Gurdwara Sabha
Punjabi International Cultural Society	Multiple Sclerosis Society (Medway Towns Branch)
Royal Association For Deaf People	Medway Ethnic Minority Forum
Showman's Guild of Great Britain	Sikh Sangat Gurdwara Association
Siri Guru Nanak Gurdwara	Sri Guru Ravidass Sabha
Strood Youth & Community Centre	Women's National Commission
Women's Aid	
Women's Support Service	

- 3.4 A copy of all the responses to the Issues and Options Report can be found at the Council's web page⁸ together with the responses of the planning officers.

4.0 Policy Formulation

- 4.1 As a result of the Issues and Options consultation⁹ and together with the Sustainability Assessment of the main strategic options the most sustainable option was chosen and draft policies written for the Pre-Publication Draft Core Strategy.
- 4.2 The strategic nature of Core Strategy planning policies means that their impact is wide-ranging and can be difficult to quantify. This is particularly so with regard to equalities matters. The significance of impacts is dependent on the location of development, as well as the magnitude and duration of those effects. Therefore, uncertainty exists in determining the precise nature and significance of some of the impacts identified for the generic policies.
- 4.3 The objectives of the Core Strategy have been designed to deliver balanced growth, bringing the benefits of regeneration to all sectors of the community, and retaining and developing infrastructure, services and facilities needed to support a good quality of life for all people living in, working in or visiting Medway. The council sought to involve a diverse range of people in the development of the Core Strategy. There was a multi-channel media approach

⁸<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/corestrategy/issuesandoptionsreport.aspx>

⁹<http://www.medway.gov.uk/pdf/I&O%20Public%20Consultation%20Report%20Aug%202009%20Iss%204.pdf>

¹⁰<http://www.medway.gov.uk/pdf/PPDCS%20Public%20Consultation%20Report%20Nov-Dec%202010%20Iss%204.pdf>

in promoting key stages of work, and direct discussions with stakeholders throughout the process.

5.0 Pre-Publication Draft Core Strategy (PPDCS)

- 5.1 A Pre-Publication Draft Core Strategy consultation was carried out from 1st November 2010 to 10th December 2010. The results of this consultation can be seen in the Council's PPDCS Consultation document¹⁰.
- 5.2 This consultation included a range of bodies concerned with race, gender, disability, age and religion. A full list of consultees can be found in the PPDCS Consultation document. In addition to this some libraries and shopping centres had a one-day staffed exhibition showing the documents and areas affected, to reach a wide cross section of the local community.

6. Publication Draft Core Strategy

- 6.1 All the responses from the PPDCS consultation were examined and responses made. Any equality issues were then highlighted and amendments made where necessary. However, as with previous rounds of consultation the policies and issues that were raised in the documents were strategic and related to the population in Medway as a whole. Therefore, no equalities issues were identified.
- 6.2 The council carried out a six week consultation on the Publication Draft Core Strategy from 30 August to 14 October 2011, using the database of consultees established at the PPDCS stage. The representations received have been considered in producing the Submission Draft Core Strategy.

7. Submission Draft Core Strategy

- 7.1 The Submission Draft Core Strategy has been produced following consideration of the representations received to the consultation on the Publication Draft. There were not found to be any comments received that required changes to be made to the document in response to equalities issues.

8. Diversity Impact Assessment: Screening Form

Directorate RCC	Name of Strategy Medway Core Strategy (LDF)		
Officer responsible for assessment Catherine Smith		Date of assessment December 2011	New or existing? Existing
Defining what is being assessed			
1. Briefly describe the purpose and objectives		To provide a spatial planning framework for Medway up to 2028. Medway's Core Strategy will be the main part of the Local Development Framework. It will: • Establish the pattern of development over the next 17 years • Provide the basis for all key planning decisions	

	• Tackle a range of issues that are relevant to local people and with the overall aim of improving our quality of life • Set out what needs to be done, by whom and how • Allocate land for 'strategic' developments • Set out a local environmental agenda • Provide the basis for significant improvements in our economic performance. A Communication Plan will provide regular information to people in Medway about progress on LDF (in conjunction with SCS and LTP3).	
2. Who is intended to benefit, and in what way?	All residents, businesses, employees & visitors. Providing an improved environment in which to work, live and visit, and a framework to deliver a range of different strategies together.	
3. What outcomes are wanted?	An attractive Medway that meets the needs of Medway residents. Delivery of high quality homes, jobs, shops leisure. A safe environment for all.	
4. What factors/forces could contribute/detract from the outcomes?	• Contribute • Active participation and buy in from the different parts of Medway Council. • Partnership working with outside bodies.	• Detract • Economic downturn • Medway's existing image
5. Who are the main stakeholders?	Residents, Workers, Visitors, Developers, Businesses, Community groups, Charities, Council (departments), LSP, National Organisations, Other Kent L.A.'s	
6. Who implements this and who is responsible?	Development partners / infrastructure providers Medway Council	

Assessing impact		
7. Are there concerns that there <u>could</u> be a differential impact due to <i>racial groups</i> ?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	The policies apply to all sections of the community. Medway Human Rights and Equality Council was consulted. No adverse comments have been received. The plan recognises the housing needs for gypsies and travellers. The views of relevant groups have and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	

8. Are there concerns that there <u>could</u> be a differential impact due to <i>disability</i> ?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	The policies apply to all sections of the community. The Housing Strategy has elements within it that will meet the needs of disabled people. There is also recognition of community needs in the policy concerning health and social infrastructure. The views of relevant groups have and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
9. Are there concerns that there <u>could</u> be a differential impact due to <i>gender</i> ?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	The policies apply to all sections of the community. We have projected demographics for Medway covering the lifespan of the Core Strategy. The priorities as identified so far enable both males and females to benefit. The views of relevant groups will continue to be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
10. Are there concerns there <u>could</u> be a differential impact due to <i>sexual orientation</i> ?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	The policies apply to all sections of the community. The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
11. Are there concerns there <u>could</u> be a have a differential impact due to <i>religion or belief</i> ?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	The policies apply to all sections of the community. There is recognition of community needs, including places of worship, in the policy concerning health and social infrastructure. The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
12. Are there concerns there <u>could</u> be a differential impact due to people's <i>age</i> ?	YES	Brief statement of main issue
	NO	

What evidence exists for this?	The policies apply to all sections of the community. The Youth Parliament and groups concerned with the interests of older people were consulted. No adverse comments have been received. The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
13. Are there concerns that there <u>could</u> be a differential impact due to <i>being transgendered or transsexual</i> ?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	The policies apply to all sections of the community. The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
14. Are there any <i>other</i> groups that would find it difficult to access/make use of the function (e.g. young parents, commuters, people with caring responsibilities or dependants, young carers, or people living in rural areas)?	YES	If yes, which group(s)? The policies apply to all sections of the community. A key feature of the Core Strategy is to improve the living and work conditions of more deprived areas of Medway, and to ensure that local communities are well served by services and facilities. The plan includes policies focused on the sustainability of Medway's rural areas, supporting the retention and development of village services. There was specific consultation carried out with rural communities, including parish councils and wider community groups.
	NO	However it is recognised that despite the use of a wide range of consultation methods, the interests of some groups in the community may be under-represented.
What evidence exists for this?	It is recognised that there are hard-to-reach groups that are more difficult to actively involve in the production of the Core Strategy, but efforts have been made to consider their needs as part of the plan making process, and to ensure that the development objectives benefit all in Medway.	
15. Are there concerns there <u>could</u> have a differential impact due to <i>multiple discriminations</i> (e.g. disability <u>and</u> age)?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	The views of relevant groups have been sought at appropriate stages as the strategy progresses. So far no adverse comments have been received.	

Conclusions & recommendation		
16. Could the differential impacts identified in questions 7-15 amount to		Brief statement of main issue
	YES	There could be adverse impacts if there is a

there being the potential for adverse impact?	NO	failure to engage with and take on board the needs and requirements of particular groups.
17. Can the adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or another reason?	<u>YES</u>	Please explain Regeneration activity will seek to reduce deprivation, raise skills levels and bring benefits to all of Medway's communities.
	NO	
Recommendation to proceed to a full impact assessment?		
NO	This policy change complies with the requirements of the legislation and there is evidence to show this is the case.	
Action plan to make improvements		
Outcome	Actions (with date of completion)	Officer responsible
Wider consultation to get better information upon which to plan	Seek views of e.g. Women in Enterprise and Medway Older People's partnership groups	Catherine Smith
Better quality information upon which to plan	To ensure analysis breaks down all survey data by equality strand (ethnicity, disability, gender, age etc)	Tim Stephens
Planning ahead: Reminders for the next review		
Date of next review	Prior to next stage – Adoption of Core Strategy (anticipated summer 2012)	
Areas to check at next review (e.g. new census information, new legislation due)	Legislation Changing demographics	
Signed (completing officer/service manager) 	Date	12 December 2011
Signed (service manager/Assistant Director) 	Date	12 December 2011

Related Documents:

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ATTACHMENT 7

Medway Local Development Framework Statement of Community Involvement Development Plan Document Schedule of Representations (December 2011)

Reference Number	Respondent / Reference Number	Policy / Section	Summary of Representation	Officer Comment / Recommendation
1.	SCI1. Land Securities (CBRE)	Paragraph 5.13	Seeks additional wording for clarification: “...However, in a recent consultation event for Lodge Hill, a number of key stakeholders and organisers were contacted <u>by the developer</u> . A list of these groups can be found in Appendix B”.	Accept.
2.	SCI1. Land Securities (CBRE)	Paragraph 6.13	Seeks amendment to text to refer to more recent document from: “... General guidance on publicising planning applications is set out in Circular 15/92 and more recently the Town and Country General Development Procedure Order 1995 (GPDO)....”.	Accept.

			To:	
			“... General guidance on publicising planning applications is set out in Circular 15/92 and more recently the <i>Town and Country Planning (Development Management Procedure) (England) Order 2010 (DMPO)</i>.....”	
3.	SCI1. Land Securities (CBRE)	Paragraph 7.3	The text wording confirms that developers are expected to take account of, and meet the requirements of, Medway Council's Guide to Developer Contributions SPD before submitting planning applications. The respondent seeks a more flexible approach, recognising that site-specific circumstances have a large part to play in the contributions that may or may not be required.	Noted. No further change considered necessary.
4.	SCI1. Land Securities (CBRE)	Appendix 1	Seeks updated change to the following entry in Appendix A (List of Consultees): ‘Defence Estates Infrastructure Organisation’.	Accept.
5.	SCI2. David Murr (Medway Countryside Forum)		Believes that the policies presented for ‘consultation’ are more a reflection of the Council's own entrenched policies and vision than a real intention to involve the community in forming a new strategy for Medway. Considers that there is too much of a priority	Noted. No further change considered necessary.

			on growth and economic priorities. Concerned that the opportunities for an effective response has been constrained by: - The limited time allowed for preparing responses to what are detailed and complex documents - The inadequate publicity given to the consultation process. - The difficulty in framing objections or alternatives to the strategy within the limits set by the 'soundness' tests. Believes that the LDF system is overly complex.	
6.	SCI3. John Hill	Planning Applications	States that for the last few months plans e.t.c...relating to planning applications have not been available for inspection at local libraries. It would be of assistance if they were again to be available.	Noted. No further change considered necessary. For several years now, planning application documentation has only been made available for viewing online. This change was made in order to reduce staff and printing costs. However, all planning application documentation still remains available for inspection online within each library facility.
7.	SCI4. Sarah Harrison,	General	SCI could be improved by making it clear: - Southern Water is recognised as a	Noted. No further change considered necessary.

	Southern Water	'specific consultation body'. - Identifying which stakeholders will be consulted at all stages. - The Tables on pages 13, 14 & 15 should identify which stakeholders will be sent copies of DPD's and SPD's at all stages including adoption. Would expect this to be the case with all specific consultation bodies. - The length of the consultation period at each stage. Wants a commitment from the Council to consult Southern Water on relevant planning applications. Welcomes the following: - Southern Water is recognised as a consultation body in Appendix A - The commitment from the Council to give reasons on how views expressed in representations are incorporated into its decision making process.	Southern Water is already recognised as an important consultation body. It is listed as a consultation body in appendix A (as the organisation has acknowledged). It is not considered either appropriate or necessary to specifically refer to the role or importance of individual consultation bodies, or to identify in the Statement which particular organisations will be consulted at all stages, as this is considered impractical. Similarly, it is not considered practical to define in advance the precise length of consultation periods at each stage, as these may need to vary depending upon individual circumstances. It is not considered necessary to include a specific commitment that the Council to consult Southern Water on relevant

				planning applications. The Council already consults Southern Water and other key consultees in relation to such matters. If Southern Water, or any other key consultee indicates that it wishes to amend the criteria regarding the types of planning application that it is consulted on, the Council will implement such a change. It is considered that the additional wording being proposed in response to representation SCI5 (see below), which refers to 'specialist community engagement with groups or organisations with expert technical and/or local knowledge' is sufficient.
8.	SCI5. The Theatres Trust	Paragraph 3.16	To be fully effective, the paragraph should contain details for community members and organisations to apply to join the LDF Database or to change their details. Amend text from:	Accept.

			“The Council has established a consultation database where all the consultation carried out by the council goes into one database. Results of consultation are available to all Council departments and duplication of survey work is avoided where possible. In this sense a corporate approach to public consultation on the LDF can be achieved”. To: “The Council has established a consultation database where all the consultation carried out by the council goes into one database. Results of consultation are available to all Council departments and duplication of survey work is avoided where possible. In this sense a corporate approach to public consultation on the LDF can be achieved. <u>If you would like to join the LDF consultation database please contact us using one of the methods identified at the front and back of this document. Similarly, please let us know if you are already on the LDF consultation database and want to either amend or remove your contact details</u>”.	

9.	SCI5. The Theatres Trust	Paragraph 6.7	Seeks additional approach to be added to the bottom of the table setting out 'consultation approach to the three tiers': <u>"Specialist community engagement with groups or organisations with expert technical and/or local knowledge"</u>	Accept.
10.	SCI5. The Theatres Trust	Paragraph 6.10	Seeks additional text: "On a site specific basis developers will be asked to produce a method statement which details how they will consult with the local community in advance of a formal planning application being made. This will detail how they are to reach local groups and a wide cross section of the local community who will be affected by the development, <u>Where appropriate, developers are advised to make contact with specialist groups and organisations with expert technical and/or local knowledge...."</u>	Accept.

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ATTACHMENT 8

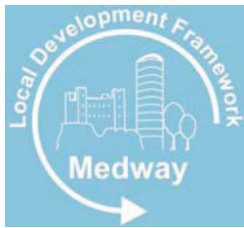
Medway Local Development Framework Statement of Community Involvement Development Plan Document Schedule of Proposed Minor Amendments (December 2011)

Minor Amendment Reference Number	Respondent / Reference Number	Policy / Section	Proposed Change	Reason for Change
1.	SCI1. Land Securities (CBRE)	Paragraph 5.13	Insert additional wording for clarification: “ ...However, in a recent consultation event for Lodge Hill, a number of key stakeholders and organisers were contacted <u>by the developer</u> . A list of these groups can be found in Appendix B”.	Recommended change by stakeholder.
2.	SCI1. Land Securities (CBRE)	Paragraph 6.13	Amend text to refer to more recent document from: “ General guidance on publicising planning applications is set out in Circular 15/92 and more recently the Town and Country General Development Procedure Order 1995 (GPDO).....”.	Recommended change by stakeholder.

			To: “ General guidance on publicising planning applications is set out in Circular 15/92 and more recently the <i>Town and Country Planning (Development Management Procedure) (England) Order 2010 (DMPO)</i>....”	
3.	SCI1. Land Securities (CBRE)	Appendix 1	Amend the following entry in Appendix A (List of Consultees): ‘Defence <u>Estates Infrastructure Organisation</u>’.	Recommended change by stakeholder.
4.	SCI5. The Theatres Trust	Paragraph 3.16	Add additional text from: “The Council has established a consultation database where all the consultation carried out by the council goes into one database. Results of consultation are available to all Council departments and duplication of survey work is avoided where possible. In this sense a corporate approach to public consultation on the LDF can be achieved”. To: “The Council has established a consultation database where all the consultation carried	Reflects change recommended by stakeholder.

			out by the council goes into one database. Results of consultation are available to all Council departments and duplication of survey work is avoided where possible. In this sense a corporate approach to public consultation on the LDF can be achieved. <u>If you would like to join the LDF consultation database please contact us using one of the methods identified at the front and back of this document. Similarly, please let us know if you are already on the LDF consultation database and want to either amend or remove your contact details</u>”.		
5.	SCI5. The Theatres Trust	Paragraph 6.7	Add additional approach to the bottom of the table setting out ‘consultation approach to the three tiers’: <u>“Specialist community engagement with groups or organisations with expert technical and/or local knowledge”</u>	Reflects change recommended by stakeholder.	
6.	SCI5. The Theatres Trust	Paragraph 6.10	Insert additional text: “On a site specific basis developers will be asked to produce a method statement which details how they will consult with the local community in advance of a formal planning application being made. This will detail how	Reflects change recommended by stakeholder.	

				they are to reach local groups and a wide cross section of the local community who will be affected by the development, <u>Where appropriate, developers are advised to make contact with specialist groups and organisations with expert technical and/or local knowledge....</u>”	



Medway Local Development Framework



Statement of Community Involvement

January 2012

Summary

This document is a new revised version of the Statement of Community Involvement or SCI for Medway. It sets out how the Council will involve local people in planning and development issues affecting Medway.

The Council adopted its original SCI in 2006. Since then there have been further changes to the development planning system and consultation bodies have come and gone. For these reasons it is appropriate to update and refresh it now.

It includes a short description of the development planning system and Medway Council's role. However most of the document describes the methods the Council will use to engage with the public and other stakeholders and it lists the main organisations that have expressed an interest in being involved.

Getting involved:

There are a number of ways in which you can give us your views, check progress on the preparation of this and other LDF Documents and get involved in planning and development issues:

- **Telephone:** 01634 331629 (Office hours are 9 a.m. – 5 p.m. Monday to Thursday and 9 a.m. – 4.30 p.m. Friday)
- **Email:** ldf@medway.gov.uk
- **Post:** Development Policy and Engagement Team, Regeneration, Community and Culture, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR
- **Website:** <http://www.medway.gov.uk/ldf> . This is our front page and you will find numerous links to published documents, our Limehouse system etc.
- **Limehouse:** This is an online consultation system and we would strongly encourage you to “register” as a user. If you do you will receive email alerts when new consultations are underway, you can submit your views in a structured way and see our responses to all representations we receive. To register please go to: <http://medway-consult.limehouse.co.uk/>

Further Advice

If you would like any further advice on this document or the planning system in Medway the Development Policy & Engagement Team will always be pleased to help. The contact details are as above.

If you would like more general and independent advice the Planning Aid service is available.

Planning Aid South East

Planning advice

The planning system is often seen as complex and difficult to navigate. Planning Aid are able to explain the complexities of it and help you get involved, whether it is by explaining how to comment on a planning application or a national policy statement. If you would like advice or information on any aspect of the planning system call their Planning Advisor.

Planning Advisor

Tel: 0870 850 9806

email: secw@planningaid.rtpi.org.uk

email: secw1@planningaid.rtpi.org.uk

Community Planning

Planning Aid also provides training, workshops and seminars for community groups, schools and voluntary groups who would like to learn more about the planning system. If you would like to get more involved in the planning of your area then Planning Aid, through its programme of community involvement in planning and regeneration, can help. Please contact their Community Planners for more information.

Community Planners

Tel: 01634 831167 **email:** secp@planningaid.rtpi.org.uk

email: secp1@planningaid.rtpi.org.uk

Specific people in the Development Policy and Engagement Team that you might find it useful to talk to are listed below. Please phone 01634 33**** followed by the relevant extension number:

Paul Cronk	ext 8146
Morgan Slade	ext 1028
Bryan Geake	ext 1025



Email

ldf@medway.gov.uk

or visit our
website at

www.medway.gov.uk/ldf



Minicom

(01634) 333111

This information is available in other
formats from (01634) 331629

If you have any questions about this leaflet and you want to speak
to someone in your own language please ring (01634) 331629

এই লিফলেট সম্পর্কে আপনার যদি কোন প্রশ্ন থাকে এবং এ ব্যাপারে আপনার নিজের
ভাষায় কারো সাথে আলাপ করতে চান, তাহলে দয়া করে এই নম্বরে টেলিফোন করুন:

**331780
(Bengali)**

如果你對這本小冊的內容有任何疑問，且想與會說你的語言的某人談
話，請打這個電話號碼

**331781
(Chinese)**

જો તમને આ પત્રિકા વિશે કોઈ પ્રશ્નો હોય અને તમે તમારી માતૃભાષામાં કોઈની
સાથે વાત કરવા માગતા હો તો કૃપા કરીને આ નંબર ઉપર ફોન કરો

**331782
(Gujarati)**

यदि आपने इस लीफलेट के बारे में कुछ पूछना है और उस व्यक्ति के साथ आप अपनी
भाषा में बात करना चाहते हैं, तो कृपया निम्नलिखित नंबर पर टेलीफोन करने करें:

**331783
(Hindi)**

ਜੇ ਤੁਸੀਂ ਇਸ ਲੀਫਲੈਟ ਦੇ ਬਾਰੇ ਕੁੱਝ ਪੁੱਛਣਾ ਚਾਹੁੰਦੇ ਹੋਵੋ ਅਤੇ ਤੁਸੀਂ ਉਸ ਵਿਅਕਤੀ ਦੇ ਨਾਲ
ਆਪਣੀ ਬੋਲੀ ਵਿੱਚ ਗੱਲ ਕਰਨੀ ਚਾਹੁੰਦੇ ਤੋ, ਤਾਂ ਕ੍ਰਿਪਾ ਕਰਕੇ ਅੱਗੇ ਲਿਖੇ ਨੰਬਰ ਤੇ ਟੈਲੀਫੋਨ ਕਰੋ:

**331784
(Punjabi)**

اگر آپ اس کتابچے کے بارے میں کوئی سوال پوچھنا چاہتے ہیں اور آپ کسی فرد سے اپنی زبان میں بات کرنے
کے خواہشمند ہیں تو براہ مہربانی اس نمبر پر فون کیجئے۔

**331785
(Urdu)**

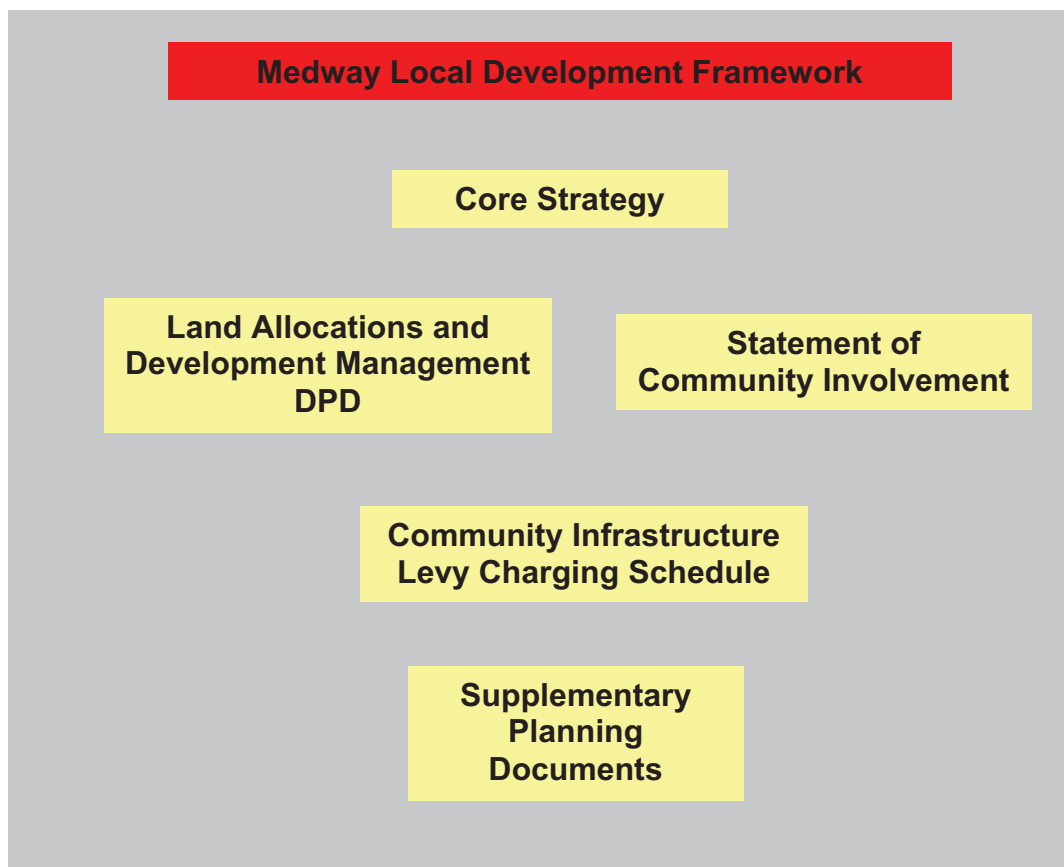
Elinizdeki bu yazılı duyuru ile ilgili herhangi bir sorunuz varsa ve dilinizi
bilen birisi ile konuşmak istiyorsanız, lütfen 331786 numaraya telefon edin.

**331786
(Turkish)**

1. Introduction

The new planning system

- 1.1 The Planning and Compulsory Purchase Act 2004 replaced a system of Structure and Local Plans with Regional Spatial Strategies (RSS) and Local Development Frameworks (LDF). Some further changes were made in the Planning Act 2008.
- 1.2 Further changes were also announced when the Coalition Government was elected in 2010. These are focussed on the Localism Bill that is currently going through Parliament. Perhaps the most significant change being proposed is the abolition of regional spatial strategies. In the case of Medway this is known as the South East Plan. Pending its abolition Medway's local development framework or LDF has to be in 'conformity' with that plan.
- 1.3 The Government is also moving to rename local development frameworks 'local plans'. This is potentially confusing as some old style local plans dating from before 2004 are still in place. Such changes make preparing Medway's local development frameworks difficult but the Council considers it important to make progress and as quickly as is prudent.
- 1.4 The current system is described in a Government publication Planning Policy Statement 12: 'Local Spatial Planning' (PPS12):
(<http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/pps12/>).
The following website also contains useful information about the current system and emerging changes:
<http://www.planningportal.gov.uk/planning/planningsystem/localplans>
- 1.5 PPS12 contains the following:
"The Local Development Framework is the collection of local development documents produced by the local planning authority which collectively delivers the spatial planning strategy for its area. The Core Strategy is the key plan within the Local Development Framework."
"The planning system has been substantially reformed to embed community responsive policy-making at its heart and to make contributing to the achievement of sustainable development a statutory objective. The new spatial planning system exists to deliver positive social, economic and environmental outcomes, and requires planners to collaborate actively with the wide range of stakeholders and agencies that help to shape local areas and deliver local services." (paras 1.4 and 1.5)
- 1.6 This stresses the importance of community involvement in the plan-making process and hence the role of this document – the Statement of Community Involvement.
- 1.7 It forms part of Medway's LDF as illustrated on the diagram below.



2. Aims and objectives of the SCI

- 2.1 The aim of the process of community involvement is to produce consensus, as far as possible, on the form and content of the local development documents which Medway Council is preparing. Where this is successful, it will help to achieve broad support from local communities and minimise the need for lengthy public examinations.
- 2.2 Sometimes the Council has to make difficult choices as to what policies or proposals should be in the LDF. For example these must conform with national policies. In these cases it may not always be possible to achieve consensus but it is important that local people understand the reasons for decisions reached and have every opportunity to express their views. To achieve this there should be meaningful involvement by all of those with an interest in the future of the area throughout the preparation of all local development documents.
- 2.3 The process by which we aim to achieve this is set out below.
- 2.4 The SCI covers Medway Council's policy for involving the community not only in the preparation, alteration and revision of local development documents but also key planning applications. It aims to be a clear public statement that enables the community to know when and how it will be involved. The Government has set minimum requirements for public involvement, with which local planning authorities must comply. The SCI shows how these requirements will be met and exceeded.
- 2.5 Medway Council's standard is to seek participation from as wide a section of the community as possible that work, live and use the Medway area. It also aims to

use the results of that participation in a positive way to shape the future for Medway.

- 2.6 The Council considers this to be a 'living' document and it will further amend it when required. Importantly it will always look to devise new methods to positively engage with the public and to learn from them. As such the standards and approaches set out below are intended to set a minimum standard that will be frequently exceeded.
- 2.7 The Council consults the public on many issues, not just planning ones. As a result there is sometimes a danger of consultation 'fatigue' or 'overload'. To overcome this consultation exercises will be co-ordinated where this is practicable and results shared so that work across the Councils is informed.
- 2.8 Medway has a wide range of community and voluntary groups operating in the area. It has been estimated that including all the small community groups, there are well over 500 organisations. These range from very large, professionally staffed organisations to small community based groups. Very often these groups are established to address particular needs such as those of disabled children, older people and so on.
- 2.9 A particular challenge is to engage effectively with what are termed 'hard to reach' groups and sections of the community with specific needs but no organised groups to represent them. The approaches detailed below reflect this.
- 2.10 Transparency is crucial to community engagement and an important element of this is ensuring that the public can access relevant information, reports and research. The ability to do this has been transformed by the growth of the worldwide web and for this reason the Council will continue to invest in its website and ensure that all planning documents, including all those relating to the LDF, are accessible.

3. Medway's Approach to community Involvement

Bodies to be consulted

- 3.1 The Council is required to meet a minimum level of public involvement under the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). The Regulations specify that the following bodies must be consulted if the Council considers that body will be affected by what is to be covered in a development plan document.
 - Adjoining local planning authorities
 - Environment Agency
 - Natural England
 - English Heritage
 - Secretary of State for Transport
 - Relevant telecommunications companies
 - Primary Care Trust
 - Highways Agency
 - Relevant electricity and gas companies
 - Relevant sewerage and water undertakers
- 3.2 At appendix A is a list of bodies, some of which the Council is required to consult, plus other bodies which it may consult should it be thought necessary to do so.

This list is not exhaustive. The Council may also consult with the following bodies in relation to the LDF and SCI:

- Voluntary bodies, some or all of whose activities benefit the whole or part of the authority's area;
- Bodies representing the interests of:
 - Different racial, ethnic or national bodies in the area;
 - Different religious groups in the area;
 - People with disabilities in the area;
 - Persons carrying on business in the area.

3.3 The Council has identified that there are a number of key issues for the community and voluntary sector in gaining effective community involvement. Many of these issues relate to groups who may find it difficult making their views known, such as:

- People on low incomes
- The unemployed
- Lone parents
- Homeless people
- Older people
- People with disabilities
- People wanting to improve their basic skills
- People with English as a second language
- People with illnesses or addictions.

3.4 One of the aims of the SCI is to ensure that all sections of the public, including local groups and organisations, are actively involved throughout the plan making process. The Council considers that a framework of different methods should be used to contact different sections of the community in Medway. In this way the LDF in general can be developed in an inclusive way.

Dissemination, Participation and Response

3.5 There are three key elements, which are considered fundamental to involving the public in the plan making process.

3.6 *Dissemination* of Information. The following methods may be used:

- Statutory notices in the local press
- Making all documents available on the web site
- Deposit of documents in Council Offices
- Staffed exhibitions in locations throughout the Medway Area. These will usually be in village or community halls, church halls, schools or other public buildings according to availability
- Press releases containing sufficient information for an article to appear in the local press. The actual appearance of an article will depend upon the editor
- Articles in Medway Matters the Council's newspaper and in the Council's monthly e-mailed newsletter.
- Send notification and documentation to individuals and bodies as necessary.
- Making available large print versions of documents, Braille and different languages if requested. A system is in place that can cope with requests from people who don't have English as a first Language (EFL)

- Specifically identify and communicate with ethnic minorities and disability groups
- Use of site notices for site-specific issues
- Using social network sites in order to publicise events and consultation documents.

3.7 *Participation* or continuous Community Involvement. This will be achieved through the use of the following methods:

- Discussions with the Local Strategic Partnership
- Programme of public meetings, round tables or forums on large or controversial sites or issues
- Discussions and correspondence with developers and other interested parties seeking to promote or object to specific development or specific policies
- Workshops to provide an early input into the formulation of proposals for a specific site or area. The Council has already used these workshops as methods of public participation
- The Local Development Framework Advisory Group that has been established by the Council. This consists of officers and Councillors. It has responsibility for overseeing the progress of the LDF. Necessary decisions, which need to be made throughout the LDF process, will be the subject of resolutions by the Cabinet and Council after consideration by the Advisory Group.

3.8 *Responses*. The main methods of considering responses will be:

- All representations will be considered by the council and reasons given for accepting or rejecting them
- When considering representations, they will be measured against national and locally adopted guidance and other local circumstances
- A report on council responses to objections and representations and recommended amendments to documents will be published
- Revised documents will be published and further opportunities for consultation and participation will be made available in accordance with the regulations.

3.9 Different documents may require a combination of these consultation methods.

Other Methods

3.10 At each stage where community involvement is required stakeholders should be asked whether or not they felt that they had been fully involved and how they think the process could be improved. Where appropriate, new approaches will be implemented at the end of each consultation stage. In this way the community will have a significant input into developing a community consultation process that suits them and which adapts to changing needs.

3.11 This SCI will be widely distributed and other methods that the Council may use to involve the community are:

- *Opinion poll* carried out annually consisting of 1100 people in a face-to-face survey to see how people in general feel about certain issues. This is run by an agency that has experience of this method. It is run with a particular key issue in mind. The poll is usually run around September/October time

- *Citizen Panel* involving a panel of 1500 who are representative in age gender and area etc. and every year a third is replaced by new individuals. They are held 4-5 times a year and consider key issues such as the Community plan. The survey is usually in the form of a questionnaire that goes out to individuals
- *Corporate Focus groups* where hard to reach groups such as Ethnic Minorities, Age groups, Disability groups, Young peoples groups, Lesbian, Gay and Transsexual groups and the Youth Parliament can participate. Agents are used to find individuals to participate and the venues are held in local halls. A discussion paper is produced and a 1-2 hour discussion takes place. The whole of the meeting is transcribed and the discussions analysed. Feedback is given via Medway Matters or some other forum
- *Online Consultation* using our Limehouse electronic consultation system. Registered users receive e-mail alerts when new consultations are about to commence. Views can be submitted in a structured way and all responses viewed.

Specific Groups

- 3.12 The needs of the working population can be catered for by creating involvement opportunities outside normal working hours but there are a number of other groups within Medway, highlighted below, which the Council would like to be more involved in the planning process.

Young People

- 3.13 Young people represent both the present and the future of Medway, although it has sometimes been difficult to involve them in a way that is meaningful to them. Working with youth groups has strengthened there relationships in recent years and enabled many young people to contribute their views - for instance to the preparation of the Sustainable Community Strategy - on issues such as leisure, transport and nightlife. The Youth Parliament meets on a regular basis and is made up of 13-18 year olds. In partnership with a number of local organisations, the Council hosts an annual youth Parliament conference. 'MiX it Online' is a web page dedicated to the youth of Medway and is planned by a group of young people. It is a site where young people are encouraged to raise their views.

Older People

- 3.14 Senior organisations working with the Council and others have enabled many older people to contribute their views, for instance on issues such as practical assistance, fear of crime, and transport.

Equalities Working Group

- 3.15 The Council established a Race Equality Review Working Group in July 2008 to review the actions taken in response to the Race Equality Review and comment on further actions needed. The terms of references of the Working Group were extended to involve the Black Workers Forum, the Disabled Workers Forum and other equalities groups as appropriate on a regular basis. The name of the Working Group has been changed to the Equalities Working Group to reflect its inclusive remit. This is the group where wider equalities matters are raised and co-ordinated.

- 3.16 The Council has established a consultation database where all the consultation carried out by the council goes onto one database. Results of consultation are available to all Council departments and duplication of survey work is avoided where possible. In this sense a corporate approach to public participation on the LDF can be achieved. If you would like to join the LDF consultation database please contact us using one of the methods identified at the front and back of this document. Similarly, please let us know if you are already on the LDF consultation database and want to either amend or remove your contact details”.
- 3.17 The advantages are that additional resources can be accessed at a corporate level and used where appropriate timetables can be met, and resources will not be wasted by duplication of survey work.
- 3.18 In addition, all relevant LDF documents are published on the Council’s web-site, and people have the opportunity to make representations both in writing and by e-mail. The Council will also use the Local Strategic Partnership (LSP) as a forum to consult the wider community, for raising issues and making representations, where appropriate.

4. Resources & Management

- 4,1 The overall responsibility for the preparation of the Local Development Framework lies with the Planning Policy and Design Manager on behalf of the Assistant Director. The team responsible for the production of the LDF is the Development Plans and Research team under the supervision of the Development Plans and Research Manager. Also contributing to the work, at key stages, are the Design and Conservation team, the Integrated Transport team, and the Development Management team. Some elements of work will be resourced by the use of external consultants. The use of consultants on specific projects is required where there is a lack of expertise or capacity in house. Based on the division's current service planning, sufficient staff and budgetary resources are in place to ensure delivery of the LDF and these resources can be managed in such a way as to deal with most unforeseen circumstances and peaks in workload required to meet the timetable.

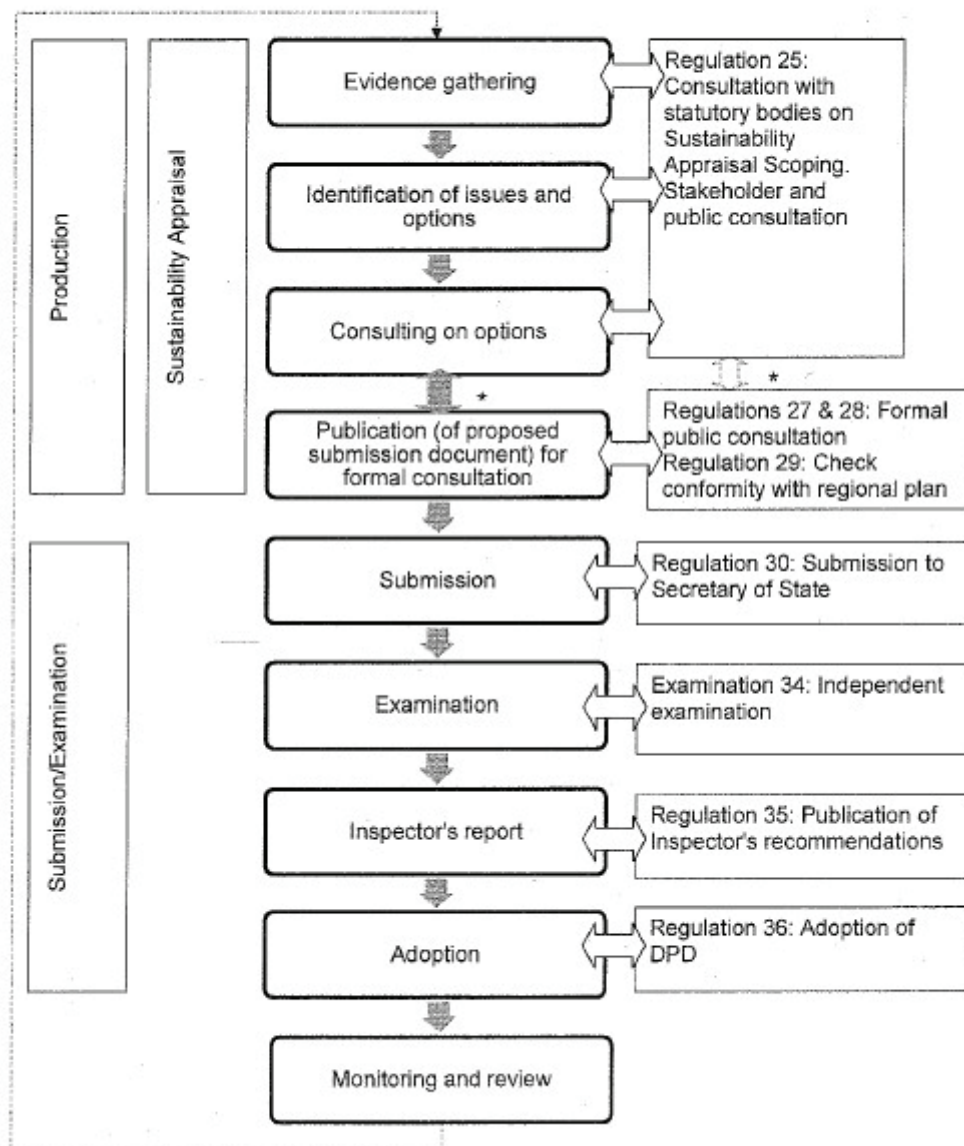
5. Public Participation During the Main Stages of Preparing the LDF

- 5.1 The process for the preparation and adoption of development plan documents is illustrated below and essentially involves four stages.

The Development Plan Document Process

Development Plan Document Preparation Process

Note: The regulations referred to are the Town and Country Planning (Local Development) (England) Regulations 2004 as amended 2008 & 2009.



- 5.2 **The Pre-production and survey** stage includes the preparation of the LDS, which describes the various documents to be produced, the timetable for their preparation and adoption and the resources needed to prepare them. In each case the Council has to collect the necessary data to develop a robust evidence base for the plan and provide the baseline for the Sustainability Appraisal process. This is usually referred to as the SA/SEA.
- 5.3 There are benefits in involving the community at this stage to begin informal discussions around key issues. These are carried out with the Local Strategic Partnership and others as necessary and appropriate. The Partnership is made up of almost 200 partner organisations, representing a wide cross section of the

community. The participation of the Partnership at both a formal and informal level will be carried through all stages of the LDF process.

- 5.4 **The Production stage** involves developing with stakeholders and the community, the vision, objectives and spatial options for the plan. These need to be developed through public consultation and participation. There are three categories of documents involved at this stage, the SCI, Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).
- 5.5 Methods of engagement to be used for each of these categories are described below.

Statement of Community Involvement

- 5.6 This revised SCI has been subjected to full public participation. It was publicised by a notice in the press, published on the council's web site and placed on deposit in the Council's offices (See fig 2) Notification of the public consultation, together with a weblink to all relevant documentation, was sent to the bodies identified in Appendix A.
- 5.7 All views on the draft of the SCI have been considered and the document amended where necessary. The Council has published its reasons for accepting or rejecting the points raised. This revised SCI does not need to be examined nor submitted to the Secretary of State. It has been adopted by the Council and placed on the Councils web site and in Council Offices and Libraries.

SCI Consultation Methods		
	Consultation stage	Adoption
<u>Dissemination of information.</u>		
Statutory notice in Press	✓	✓
All documents available on the web site.	✓	✓
Deposit of documents in Council offices and Libraries	✓	✓
Staffed exhibitions in locations throughout the Medway Area.	✓	
Press releases	✓	✓
Articles in Medway Matters		
Send notification and web link to documents to individuals and bodies as necessary	✓	✓
Making available on request for large print version of documents, Braille and in different languages.	✓	✓
Specifically identify and communicate with BME and disabled groups.	✓	✓
<u>Participation - Continuous Community Involvement</u>		
Discussions with LSP		
Programme of public meetings, round table or forums on large or controversial sites or issues.		
Discussions and correspondence with developers and other interested parties seeking to promote or object to specific development or specific policies.	✓	
Workshops with interested groups and stakeholders.		
Discussion with LDF Advisory Group	✓	

Development Plan Documents (DPD)

- 5.8 Written notification of draft documents will be sent directly to the bodies identified in Appendix A and published on the Councils web-site. The methods for Public participation are contained in the table below. All views received will be considered and if appropriate, subsequent drafts will reflect upon and take on board the comments and issues raised. The Council will publish its reasons for accepting or rejecting points made.
- 5.9 All will be subject to full public participation. They will be publicised by a notice in the press, published on the Council's website and placed on deposit in Council offices.
- 5.10 Medway Council will make representations about site allocations available for inspections at public libraries and at council offices. It will publish such representations on its website and advertise them in a local newspaper stating that the representations are available for inspection and the places and times at which they can be inspected. Copies of all representations will be sent to the Secretary of State before the independent examination takes place.

- 5.11 Following each stage of public consultation, all views will be taken into account in the preparation of subsequent versions of the Development Plan Document being prepared. The Council will publish a summary of responses and the reasons for accepting or rejecting the points raised at the end of each public consultation.

Development Plan Documents (DPDs)					
	Options Stage	Preferred Strategy	Proposed Submission	Exam	Adopt
<u>Dissemination of information.</u>					
Statutory notice in Press	✓	✓	✓	✓	✓
All documents available on web.	✓	✓	✓	✓	✓
Deposit of documents in Council offices and Libraries	✓	✓	✓		✓
Staffed exhibitions in locations throughout the Medway Area.	✓	✓			
Press releases	✓	✓	✓		
Articles in Medway Matters					
Send notification and documents to individuals and bodies as necessary	✓	✓	✓	✓	✓
Making available on request for large print version of documents, Braille and in different languages.	✓	✓	✓	✓	✓
Specifically identify and communicate with BME and disabled groups.	✓	✓	✓		
<u>Participation - Continuous Community Involvement</u>					
Discussions with LSP	✓	✓			
Programme of public meetings, round table or forums on large or controversial sites or issues.	✓	✓			
Discussions and correspondence with developers and other interested parties seeking to promote or object to specific development or specific policies.		✓			
Workshops with interested groups and stakeholders.	✓	✓			
Discussion with LDF Advisory Group including officers and members.	✓	✓			

Supplementary Planning Documents (SPD)

- 5.12 SPDs are not a statutory requirement and it is a matter for each local planning authority to decide whether to prepare them. Consequently, they do not need to

follow the full procedure set out for other parts of the LDF. Only one period of public participation is required and they are not subject to an independent examination before being adopted.

- 5.13 Forthcoming SPDs may justify the targeting of specific groups depending on what topic and location the SPD is intended to cover. It is difficult to set out the key organisations that may be contacted in advance. However, in a recent consultation event for Lodge Hill a number of key stakeholders and organisations were contacted by the developer. A list of these groups can be found in Appendix B.

Supplementary Plan Documents (SPDs)	
A) Dissemination of Information	
A1. Statutory notices in the local press.	✓
A2. Making all documents available on the website.	✓
A3. Deposit all documents in Council Offices	✓
A4. Staffed exhibitions in locations throughout the Medway Area. These will usually be in village or community halls, church halls, schools or other public buildings according to availability.	
A5. Press releases containing sufficient information for an article to appear in the local press. The actual or other public buildings according to availability.	✓
A6. Articles in Medway Matters the Councils newspaper, which is circulated free to all local households every 6 weeks.	
A7. Send notification and documentation to individuals and bodies as necessary.	✓
A8. Making available large print version of documents, Braille and different languages if requested: a system is in place that can cope with requests from people who don't have English as a first language (EFL)	
A9. Specifically identify and communicate with ethnic minorities and disability groups.	
A10. Use of site notices for site-specific issues.	✓
B) Participation- Continuous Community Involvement.	
B1. Discussions with Local Strategic Partnership.	✓
B2. Programme of public meetings, roundtables or forums on large or controversial sites or issues.	✓
B3. Discussions and correspondence with developers and other interested parties seeking to promote or object to specific development or specific policies.	✓
B4. Workshops involving schools and other interested parties to provide an early input into the formulation of proposals for a specific site or action area. The Council has already used these workshops as methods of public participation.	✓
B5. The LDF Advisory Group has been established which consists of Councillors and officers. It has responsibility for overseeing the progress of the LDF. Necessary decisions which need to be made throughout the LDF process will be the subject of resolutions by the Cabinet and Council after consideration by the LDF Advisory Group.	✓

- 5.14 **The Examination** is an assessment of the soundness of the DPD in terms of its content and whether the correct processes and procedures have been followed.
- 5.15 If representations were made at the publication stage, a statement setting out the number of representations received and a summary of them will be submitted with the document to the Secretary of State.
- 5.16 An independent planning Inspector holds a Public Examination into the "soundness" of the document. The Inspector will determine the procedure for the examination and those who have made representations may be invited, by the Inspector, to participate in the Examination. Afterwards the Inspector will prepare a report setting out recommended changes the Council should make to the Development Plan Document before adopting it.
- 5.17 The examination and Inspector's Report will be the subject of publicity and notification.
- 5.18 **Adoption** and entry of a DPD into the LDF will follow receipt of the Inspector's report. The adoption of these documents and of a SPD will be the subject of publicity and notification.
- 5.19 Monitoring will be carried out annually of the progress against the timetable in the LDS, the effectiveness of LDF policies, the rate of housing provision, and the need for changes to the SCI. This is done through the Annual monitoring report which is published and formally reported to the Council.
- 5.20 A copy of the most up to date Local Development Scheme that shows the programme and timetable for the preparation of Medway's Local Development Framework can be found at:
<http://www.medway.gov.uk/pdf/Medway%20local%20development%20scheme.pdf>

6. Consultations on key planning applications

- 6.1 Pre-applications discussions are particularly important for key planning applications. Some applications will be of such importance that the Secretary of State (SoS) will designate them as a major infrastructure project. They will be subject to an inquiry process. However they are very few in number.
- 6.2 The Government also intends to make pre-application consultation with local communities a statutory requirement. When this is brought in it may supersede this part of the SCI. Notwithstanding this, the Council advocates this approach utilising a tiered approach originally advocated in guidance issued some years ago.

Tiered Approach

- 6.3 The tiered approach relates to the setting and use of indicative thresholds for determining which applications are to be subject to different types of community involvement and the level of community involvement required at each stage of the planning process. The level of consultation that will be undertaken for the various types of planning application will vary accordingly. The tiered approach sets out an indicative framework for those planning applications, which should be subject to wider community involvement.
- 6.4 In summary, these 'tiers' are as described below.

Tier Level 1

- 6.5 Major planning applications classified as tier 1 may be expected to allow the widest level of community involvement. The following types of applications are likely to be considered tier 1:
- Major Development Plan Departures - those that are seen to depart from the Development Plan
 - Schedule 1 developments – those schemes where an Environmental Impact Assessment is always required as they are likely to have significant effects on the environment
 - Applications that include the provision of gross shopping floor areas of 20,000 square metres or greater; or gross shopping floor space of not less than 2,500 square metres, which will exceed 20,000 square metres.

Tier Level 2

- 6.6 Those major applications referred to as tier 2 are likely to be subject to wider community involvement except where the council can reasonably justify why, for a particular application, the approach to wider community involvement can be waived. These may include the following:
- Schedule 2 developments – those applications where an Environmental Impact Assessment may be required as they are likely to have an effect on the environment by virtue of factors such as their nature, size or location
 - Development proposals that relate to a site of 5 hectares or more of Greenfield land, or comprise 150 dwellings or more regardless of the size of the site
 - Development proposed on playing fields as set out in the Town and Country Planning (Consultation) (England) Direction 2009 – any proposal for development of any playing field owned by the Council or used by an educational institution

Tier Level 3

- 6.7 Tier 3 major applications are likely to be determined on a 'site-by-site' basis at a local level:
- Applications of a local significance such as those which: fall marginally below the thresholds identified under Tiers 1 and 2
 - Applications that fall within sites that are 'sensitive' to development pressures – development adjoining a listed building; substantial demolition in a Conservation Area; loss of allotment land; loss of employment land for housing; and development on windfall sites
 - Other applications – to encompass lower thresholds for non-conforming uses and other types of specific development. For example, small employment/business development within residential areas, change of use of A1 retail uses to other 'non-retail' uses in neighbourhood centres and telecommunication development in 'sensitive' areas
 - Applications that will have transport implications and will require a Transport Assessment to accompany the submitted planning application.

Consultation approach to the three tiers

Approach	Tier 1: Applications where there are considerable issues of scale and controversy or contrary to or out of line with Development Plan (LDF or Area Action Plan) policy (as defined by Regulation 3 (a)-(c) in Annex 1 of circular 07/99	Tier 2: Applications broadly in accordance with Development Plan BUT raising controversial issue or detail and 'other' Departures not covered by Regulation 3 (a)-(c) in Annex 1 of circular 07/99	Tier 3: Applications of a scale or development area for which a LPA requires wider community involvement; applications that fall within sites that are 'sensitive' to development pressures and allocated sites that may not have generated significant objection through the local plan process
Public Meetings	✓		
Public Exhibition	✓	✓	
Surgeries	✓	✓	
Development Briefs	✓		
Workshops	✓		
Enquiry by Design and/ or Planning for real	✓	✓	
Citizen Panels	✓	✓	✓
Consultation Panel	✓		
Parish Councils	✓	✓	✓
Media	✓		✓
Website	✓	✓	✓
Local architectural or Design Panel	✓	✓	✓
Planning Aid	✓	✓	
<u>Specialist community engagement with groups or organisations with expert technical and/or local knowledge</u>	✓	✓	✓

- 6.8 Given the range and types of available consultation approaches, the table above provides an indication of the methods for community engagement that may be appropriate for each 'tier' of application. For example, it is expected that 'Tier 1' applications will, by their very nature and 'significance', call for a higher level of community engagement when compared to an application which may fall in 'Tier 3'. Therefore the 'ticks' in the boxes in figure 5 are merely illustrative as to the means of consultation and should not be interpreted as being prescriptive.

Protocol

- 6.9 Medway Council intends to follow a specific protocol that will enable developers to provide a good level of pre-application community involvement in their major proposals. The protocol involves two main stages:
- The Pre-application stage; and
 - The formal planning application stage.

Pre-application stage – Meetings with developers to discuss the protocol

- 6.10 On a site specific basis developers will be asked to produce a method statement which details how they will consult with the local community in advance of a formal planning application being made. This must detail how they are to reach local groups and a wide cross section of the local community who will be affected by the development. Where appropriate, developers are advised to make contact with specialist groups and organisations with expert technical and/or local knowledge. The document will detail the methods the developer will use. For example, workshops with community groups, questionnaires, 1 to 1 meetings and wider consultations. It must allow for a wide debate within the community and have realistic aspirations. The Developer can involve a third party to undertake this consultation work on their behalf. Before a formal planning application is submitted the developer will be strongly encouraged to submit a fully detailed report to Medway Council confirming the consultation methods used, the results of the consultation and how the developers intend to take these views into account when submitting a formal planning application. The results of any such consultation will be publicly reported and taken into account in decisions made by the Council.
- 6.11 Some pre-application 'basic' measures for major applications are recommended at appendix C. It is considered that this approach should be adopted and developers are expected to apply all 10 methods of community involvement as set out.
- 6.12 It may be that applications are unlikely to fall into the 'nationally significant infrastructure' category as defined within the Planning Act. However, developer's attention is drawn to the requirements of Part 5 of the Planning Act 2008 (Duty to consult local community) that requires the applicant to produce a consultation report, and for this report to accompany the application. The report must include details of any relevant responses received by the applicant. These requirements are placed upon promoters and are recommended as best practice within this SCI for major applications that fall under the nationally significant threshold.

Formal planning application - check how the pre-application consultations feeds into the application process

- 6.13 The planning process generates a wide-ranging requirement for consultations in connection with the various types of planning applications that are received. The responsibility for publicising applications normally falls with the Local Planning Authority (LPA). General guidance on publicising planning applications is set out in Circular 15/92 and more recently the Town and Country Planning (Development Management Procedure) (England) Order 2010 (DMPO). These give practical advice on when to use the three types of publicity currently in use i.e. neighbour notification, site and press notice. In most circumstances representations about planning applications are restricted to a period of 21 days from notification. However, such bodies as Natural England will be allowed a longer period of time to comment on applications where this is prescribed by legislation.
- 6.14 It is a requirement for all major planning applications to mount a site display on or near the land for at least 21 days before determining the application, publish a local advertisement in The Press and to serve notice on any adjoining owner/occupier.¹
- 6.15 Within the Council area there are a number of key Brownfield development sites. Working with our European partners on a project called REVIT² and covering

¹ Town and Country (General Development Procedure) Order 1995.Article 8

² www.revit-nweurope.org.

cities in Germany, Holland, France and Wales a tool kit³ has been developed setting out best practice in community participation and involvement. It uses case studies as a basis for the tool kit. The tool kit is endorsed by this SCI and the methods it describes should be used where appropriate.

- 6.16 The Council recognises that all new development will need access to essential service provision and therefore providers will be consulted on major applications, where appropriate.

7. Other Matters

Role of Planning Performance Agreements

- 7.1 Planning Performance Agreements (PPAs) were formally introduced into the planning system in 2008 and are about improving the quality of planning applications and the decision making process through collaboration. They bring together the Local Planning Authority (LPA), developer and key stakeholders, preferably at an early stage, to work together in partnership throughout the planning process. They are essentially a collaborative project management process tool that provides greater certainty and transparency to the development of scheme proposals, the planning application assessment and decision-making.
- 7.2 ATLAS, the HCA's Advisory Team for Large Applications, provides a free service to Local Planning Authorities, the private sector and other stakeholders who are dealing with large scale and complex development proposals. The team can offer Local Authorities advice on a broad range of issues relating to the delivery of large predominantly residential projects and aims to provide a service that will support partners in tackling obstacles and improve relationships. The services range from helping partners with visioning and masterplanning, to more specific tasks including project management advice, advice on the planning process and addressing technical project issues. Further guidance regarding ATLAS and PPA's can be found on the ATLAS web site:
http://www.atlasplanning.com/page/about_atlas.cfm

Developer Contributions

- 7.3 Medway Council's *Guide to Developer Contributions, a Supplementary Planning Document*⁴ sets out what obligations and contributions will be required for future developments. Developers are expected to take account of, and meet the requirements of this document before submitting planning applications to the Council. It is designed to help them know what the Council is likely to require for new developments in Medway. This document will continue to be regularly reviewed and updated and the consultation process will be similar to that for all Supplementary Planning Documents as outlined earlier in this document.
- 7.4 Where planning obligations have formed part of the consultation on planning applications any necessary comments will be fed back into the process for reviewing the Developer Contributions Guide.
- 7.5 The last government introduced a Community Infrastructure Levy (CIL) whereby local authorities are now empowered, but not required, to impose a levy on most types of new development in their areas. The new Coalition Government has endorsed the CIL. Medway Council anticipates adopting a Charging Schedule

³ Available from the Council

⁴ <http://www.medway.gov.uk/environmentandplanning/planning/developercontributions.aspx>

and relevant levy by autumn 2013. There will be rounds of public consultation but these will be detailed separately.

The SCI and the Monitoring and Implementation Framework

- 7.6 The Council has a Monitoring and Implementation Framework (MIF) derived from work undertaken to provide a baseline position for both the Core Strategy and the sustainability appraisal.
- 7.7 The MIF set out in the Core Strategy indicates how policies are to be implemented, by when and by whom. It also sets out indicators to monitor these policies. As indicated above, the Council reports annually on core indicators in the Annual Monitoring Report.
- 7.8 The Sustainability Appraisal also includes a monitoring framework to monitor the performance of the Council's spatial strategy in order to ensure more sustainable development is secured. The MIF therefore builds on these existing processes, rather than establishing an additional framework and this will be reported in the AMR.
- 7.9 In this way the public can be informed of progress with implementing the LDF and whether any review of policies or proposals within it are justified.

Wider community involvement

- 7.10 The Sustainable Community Strategy has been subject to extensive consultation with the community, community groups and stakeholder organisations. The Partnership Plenary, the wider Local Strategic Partnership representing about 450 organisations and individuals has met twice to consider the developing Core Strategy. This was at the strategy development and draft strategy stages. Over 100 organisations and individuals attended on each occasion. Consultation also took place with Medway Voice, an extended Local Strategic Partnership Board, the Youth Parliament, Medway Older People's Partnership, community representatives, Councillors, the Council's Disability Forum, the Ethnic Minorities Forum, three of the most deprived neighbourhoods in Medway and the Local Strategic Partnership Thematic Partnerships.
- 7.11 Some of these consultations have been carried out jointly with the Local Transport Plan in order to ensure that these long-term strategies work together.
- 7.12 We have also drawn on other recent consultations covering local people's priorities, the results of the recent Medway resident's opinion poll and the Ofsted Tellus survey of children and young people. The draft strategy was posted onto the LSP area of the Council's website which resulted in comments from members of the public.
- 7.13 This first revision of the SCI will be consulted on at the same time as the Publication Draft Core Strategy and using the same consultation methods. In this way, an open invitation will be given to all groups (many of which overlap) who were involved in the SCS and Core Strategy process to comment on the content and delivery of the Statement of Community Involvement.

The Localism Bill/Act

- 7.14 As indicated above a new Localism Bill was presented to Parliament and received the Royal Assent in November 2011 to become an Act. The Act has

made only limited changes to the development planning system but it has introduced a new layer of Neighbourhood Planning documents below the Local Plan or LDF. The Council will seek to engage positively with local communities on neighbourhood plans in accordance with the principles set out in this Statement of Community Involvement.

Glossary

DM	-	Development Management
DPD	-	Development Plan Document
EFL	-	English as a First Language
EIP	-	Examination In Public
LDD	-	Local Development Document
LDF	-	Local Development Framework
LSP	-	Local Strategic Partnership
LDS	-	Local Development Scheme
LPA	-	Local Planning Authority
RSS	-	Regional Spatial Strategy
SCS	-	Sustainable Communities Strategy
SoS	-	Secretary of State
SCI	-	Statement of Community Involvement
SEA	-	Strategic Environmental Assessment
SPD	-	Supplementary Planning Document
SA	-	Sustainability Appraisal

Appendix A

This is a list of bodies, some of which the Council is required to consult, plus other bodies that it may consult should it be thought necessary to do so. This list is not exhaustive and can be added to as a result of this consultation process.

- 02 Airwave
- 118 Twydall Lane
- 20 Slade Close
- ABC Project
- Accent28 Limited
- Action with Communities in Rural Kent
- Adams Homes Associates
- ADE Residents Association
- Aerotation
- Age Concern Medway Ltd
- Ahmadiyya Muslim Association
- Aircraft Owners & Pilots association
- Airport Operators Association
- Airworks Services
- Alan Dawney Coach Hire
- Alec's Express Travel Ltd
- Allhallows Parish Council
- Alliance Environment & Planning Ltd
- Alltask Limited
- Alzheimer's Society (Rainham (Kent) Support Group)
- Amadeus Night Club
- AMEC Group Ltd
- Anchor Trust
- Annington Property Ltd
- Apnar Ghar
- Aramark Plc
- Arethusa Venture Centre
- Arriva Southern Counties
- Arts Council SE England
- ASD Coaches Ltd
- Aylesford Parish Council
- Barton Willmore Planning Partnership
- Batcheller Thacker
- BEBCAR (uk) Ltd
- Bellway Homes
- Berkeley Homes
- Berkeley Leisure Group
- Biffa
- Big Lottery Fund
- Birling Parish Council
- Blackbushe School of Flying
- Bloomfields Ltd
- Bond Pearce
- Boxley Parish Council
- Bredhurst Parish Council
- Brett Aggregates Western
- Bride Hall Developments Ltd
- Bridge Wardens College
- Brimble Lea
- British Archaeological Society
- British Horse Society N& W Kent.
- British Sign and Grapics Association
- British Waterways SE
- British Wind Energy Association
- Brown Group
- Bryant Homes - South East
- BSK
- BT
- Burham Parish Council
- Burnett Planning & Development Ltd
- C T C
- Cabair Flying Schools Ltd
- CABE
- Cable & Wireless
- Calverton Flying Group Ltd
- Capstone Park Volunteers
- Carter Jonas
- Castle Point Borough Council
- CBI
- CBRE
- CEMEX
- Cemex (UK) Limited
- Centre for Kentish Studies
- Chalkwell Garage & Coach Hire
- Chatham & Aylesford Liberal Democrats
- Chatham Historic Dockyard Trust
- Chatham Historic Dockyard

- Volunteer Service
- Chatham Maritime Trust
- Chatham Telephony Centre
- Chattenden Community Project
- Christ Church - Luton
- Church Commissioners for England
- Church in Society
- CI Holdings
- City of Rochester Society
- Civil Aviation Authority
- Cleanaway
- Cliffe and Cliffe Woods Parish Council
- Cluttons
- Cobham Parish Council
- Connexions Chatham Access Point
- Connexions Kent and Medway (HQ)
- Constantine Construction Co (Medway) Ltd
- Construction Engineering School
- Cooling Parish Council
- Costain Limited
- Country Land & Business Association (CLA)
- Countryside Maritime Limited
- Countryside Property
- Court Lodge, Lower Road
- Courtley Consultants Ltd
- CPRE Hoo Peninsula
- CPRE Kent
- CPRE Medway
- Creative Environmental Networks (CEN)
- Croudace Ltd
- Crystal's Coaches
- Culture South East c/o Agenda UK Ltd
- Cuxton Countryside Group
- Cuxton Parish Council
- CVS Medway
- CWS South East Co-op
- Cycling England
- Darland Residents Association
- David Hicken Associates Ltd
- David Jarvis Associates Limited
- David Lock Associates
- David R Stacey
- Davis Brown
- Deanland Airfield
- Defence Infrastructure Organisation
- DEFRA (C/O GOSE)
- Delce Manor Housing Co-operative Limited
- Delphi Diesel Systems
- Denham Aerodrome
- Department for Education and Skills
- Department for Transport Rail Sub-Group
- Department of Health
- Derwent Housing Association Limited
- Development & Residential Consulting
- Development Land Services Ltd
- DHA Planning
- Dialogue
- Dickens Country Protection Society
- Diggerland Ltd
- Diocese of Rochester - T&CP Policy
- Disability Information
- Disability Rights Commission
- Dockside Outlet Centre
- Donaldsons
- DPDS Consulting Group
- DTI
- DTZ
- DTZ Piedad Consulting
- Dunedin Property
- EDF Energy
- EDF Energy
- Elliott-Medway Fineline
- English Churches Housing Group
- English Heritage
- English Partnerships - (London)
- English Partnerships HQ
- Entec UK Ltd
- Entergy Power Group
- Environment Agency
- Essex County Council
- Ethnic Minority Forum
- Ethnic Minority Senior Citizen's Association
- Eurobell West Kent Ltd

- Faithdean PLC
- Farleigh Coaches
- Federation of Small Businesses
- Findsbury & Wainscott Community Assn
- First European Airways Ltd
- Firstgroup PLC
- Forestry Commission SE England Consevancy
- Fort Amherst Heritage Trust
- Frances Iles Gallery
- Frankie and Benny's
- Freight Transport Association London and SE Region
- Friends of the Earth (Medway)
- Frindsbury and Wainscott Community Association
- Frindsbury Extra Parish Council
- Frindsbury, Upnor & Chattenden PCC
- Fuel Oils (Holdings) Ltd
- Fuji Copain UK Ltd
- Fuji Seal
- Fusion Ltd
- FWCA Frindsbury and Wainscott Community Association
- Gala Clubs
- Gateway Knowledge Alliance
- General Aviation Awareness Council
- George Webb Finn
- Gerald Eve
- GHG Consultancy Ltd
- Gillingham Business Park
- Gillingham Football Club
- GL Hearn
- GNER Holdings Ltd
- Go-Ahead Group
- Graham Warren Partnership
- Gravesham Borough Council
- Green Issues
- Gregory Gray Associates
- Groundwork Kent & Medway
- GVA Grimley
- Habinteg Housing Association Ltd
- Hallam Land Management Limited
- Halling Parish Council
- Hands Rochester Volunteer Bureau
- Hanover Housing Association
- Hanson Aggregates
- Hanson-Tower Ltd
- Harlequin Ltd
- Harrisons Chartered Surveyors
- Hartlip Parish Council
- HE Services
- Health and Safety Executive - Hazardous Installations Directorate (West Sussex)
- Heli-charter Ltd
- Hempstead Residents Association
- Hempstead Valley Shopping Centre
- Henry Schein (UK) Holdings
- High Halstow Parish Council
- Higham Parish Council
- Highways Agency
- Hillreed Homes
- Hindu Sabha
- Historic Dockyard & South East Museums Hub
- HM Prison Cockham Wood
- HM Prison Services
- HND Ltd
- Holiday Inn (Rochester)
- Home Builders Federation
- Home Builders Federation
- Home from Home
- Home Office
- Homebase Ltd
- Hoo St Werburgh Parish Council
- Hope in the Community
- Housing 21
- Homes and Communities Agency
- Howard Hutton and Associates
- HSBC
- Hunting Consortium of Companies
- Hyde Housing Association Limited
- Icen Projects Limited
- ICM Plastic Moulding Ltd
- ING
- Inland Revenue
- IPS International LTD
- Isle of Grain Parish Council
- Iwade Parish Council
- J Sainsbury plc
- Jaycrest Ltd
- JobcentrePlus
- John Divine

- John Sharkey & Co
- Jones Day
- Judith Ashton Associates
- K Ying Chinese Elderly Association
- Kala Kendra
- Keith Hammond
- Kelsey Housing Association Limited
- Kent & Medway Biological Records Centre
- Kent & Medway Economic Board
- Kent & Medway Fire and Rescue Services
- Kent & Medway Learning & Skills Council
- Kent & Medway Rural Transport Partnership
- Kent & Medway Safety Camera Partnership
- Kent Air Ambulance Trust
- Kent Ambulance NHS Trust
- Kent and Thameside Fastrack
- Kent Archaeological Society
- Kent Architecture Centre
- Kent Association For Spina Bifida & Hydrocephalus
- Kent Association of Parish Councils
- Kent Bangladesh Welfare Association
- Kent Community Housing Trust
- Kent Council for Voluntary Youth Service
- Kent County Council - Heritage Conservation Group
- Kent County Council - Planning
- Kent Downs AONB Unit
- Kent Energy Centre
- Kent Ethnic Minorities Disabilities Forum
- Kent Express
- Kent Fire and Rescue Service HQ
- Kent Islamic Centre
- Kent Malayalee Association
- Kent Multicultural Community Association
- Kent Muslim Welfare Association
- Kent Ornithological Society
- Kent Police (Estate Department)
- Kent Probation Service (HQ)
- Kent Ramgarhia Darbar - Gurdwara
- Kent Refugee Action Network (KRAN)
- Kent Reliance Building Society
- Kent RIGS Group M
- Kent Rural Community Council
- Kent Turkish Welfare Association
- Kent Wildlife Trust
- Kent Youth
- Kevin Wise Town Planning & Development Services
- Keystone Centre
- KGB Cleaning Services (Southern) Ltd
- King George V Memorial Houses
- Kings Ferry
- Kingsley House
- Kingsley Smith
- Kingsley Smith & Co
- Kingsnorth Power Station
- KTI Energy Ltd
- KTNC Medway Group
- Kut-O Chinese Association
- L & Q Beaver Ltd
- L C P Automotive Components
- L Robinson & Co (Gillingham) Ltd
- La Leche League Of Rochester
- LA21 Transport Forum
- Lafarge Cement UK
- Lambe & Evans Building Contractors Ltd
- Lambert Smith Hampton
- Lapthorne industries
- LAW Leasing Ltd
- Lee Evans Planning
- Legal Services Commission - SE
- Levvel
- Lilliput Childcare
- Littman Robeson
- Lloyds TSB Bank PLC
- Lloyds TSB Life Assurance Co Ltd
- Locate in Kent
- Lower Halstow Parish Council
- Luddesdown Parish Council
- M Logistics International
- M Y Cartons Ltd
- Mackays of Chatham Plc
- Maidstone Borough Council
- Malcolm Judd and Partners
- Marine and Fisheries Agency
- Marks & Spencer plc
- McCarthy & Stone
- McDonalds Restaurants
- Medway & Swale Estuary Partnership
- Medway Access Group

- Medway Afro Caribbean Association (Gillingham)
- Medway Arthritis Self Help
- Medway Association of Independent Taxi Drivers
- Medway Asthma Self-help
- Medway Bridge Marina Limited
- Medway Chamber of Commerce
- Medway Citizens Advise Bureau (CAB)
- Medway Community College
- Medway Community Living Services Ltd
- Medway Credit Union
- Medway Cycle Forum
- Medway Education Business Partnership
- Medway Ethnic Minority Forum
- Medway Fawcett Society
- Medway Friends of the Earth
- Medway Green Party
- Medway Health Forum
- Medway Hindu Centre
- Medway Homestart
- Medway Inter Faith Action
- Medway Language Achievement Service
- Medway Learning Partnership
- Medway Licensed Taxi Drivers Association
- Medway Maritime Hospital
- Medway Mediation
- Medway Mencap Society
- Medway NHS Trust
- Medway Pensioners Forum
- Medway Ports
- Medway Providers Forum
- Medway Racial Equality Council
- Medway Residents Group
- Medway Scout Association
- Medway Teaching Primary Care Trust (PCT)
- Medway Towns Conservation Volunteers
- Medway Towns Crime Prevention Panel
- Medway Towns Footpath Group
- Medway Towns Gurdwara Sabha
- Medway Urban Parks & Green Spaces Forum
- Medway Valley Countryside Partnership
- Medway Waste Forum
- Medway Youth Parliament
- Mercury Personal Communications Ltd
- MeRGe
- MHS Homes
- Michael Dakers Solicitors
- Michael Parkes Chartered Surveyors
- Michael Parkes Surveyors Ltd
- Micro Medical
- Mid Kent College
- Mineral Products Association
- Ministry of Defence
- Minster on Sea Parish Council
- Mittal Steel Kent Wire Ltd
- MM2K
- Moat Homes Limited
- Moat Housing Society
- Mobile Operators Association
- Mono Consultants
- Mowlem
- Multiple Sclerosis Society (Medway Towns Branch)
- N & D Attwood
- Nathaniel Lichfield & Partners
- National Federation of Bus Users
- Natural England
- Natural Resources Institute
- Natwest Bank PLC
- NCH South East
- Nestledown Beds Ltd
- Network Rail
- New Brompton College
- Newington Parish Council
- NFU
- North Kent Chamber of Commerce
- North Kent Justice Area
- North Kent Magistrates' Court
- North Kent Rail Users Group
- Northfleet Cleaning Services Co Ltd
- Nu Venture Coaches Ltd
- Oasis Unit, HMP Rochester
- Open Spaces Society
- Orange
- Orbit Group Ltd
- Orbit Group Ltd
- Parklake Estates Limited
- Pentagon Shopping Centre

- Persimmon Homes South East
- Planning Perspectives
- Planning Inspectorate
- Planning Potential
- Popular Flying Association
- Powergen Ltd
- PPS Phillips Planning Services Ltd
- Presentation Housing Association
- Presentation Housing Association Limited
- Prime Construction Consortium
- Princess Royal Trust
- Probation Service - Medway Local Office
- Protem (Kent) HGV
- Punjabi International Cultural Society
- R Swain & Sons Ltd
- R W Graphics
- Rail Passengers Council Southern England
- Rainbow Arts
- Rainham & Gillingham Privacy Care Group
- Rainham Gillingham and Chatham Amenity Society
- RAISE
- Ramblers Association (Kent)
- Ramblers Association (London)
- Rapleys
- Rebound ECD Ltd (Medway STC)
- Redhill Air Services
- Redroute Buses
- Redrow Homes (Eastern) Ltd
- Reeves & Neylan Accountants
- RHA
- River Medway Business User Group
- RNID South East and Anglia
- Robert Brett & Sons Ltd
- Rochester Airport Consultative Committee
- Rochester Airport PLC
- Rochester Bridge Trust
- Rochester Cathedral
- Rochester Diocese
- Rochester Diocese Board of Education
- Rochester Independent College
- Roger Tym & Partners
- Rosemound Developments Ltd
- Roueagle Ltd
- Royal Association For Deaf People
- Royal Mail South East
- Royal School of Military Engineering
- RPS Group
- RPS Planning
- RSPB (Medway)
- RSPB South East Regional Office
- S W Attwood & Ptrs
- Safeway Stores Plc
- Salvation Army
- Sanctuary Housing Association
- Savills
- Scout Association
- Secondsite Property Holdings Ltd
- Secondsite Property Holdings Ltd
- SEEBOARD
- SEEDA
- SEERA
- Seneschal
- Shepherd Neame
- Sheppy Industries Ltd
- Shoosmiths
- Shorne Parish Council
- Showman's Guild of Great Britain
- Sikh Sangat Gurdwara Association
- Siri Guru Nanak Gurdwara
- Skanska
- Smith Stuart Reynolds
- Snodland Town Council
- Social Inclusion Project For Medway Young People
- Society Linen Services Ltd
- Somerfield Stores Ltd
- South East Centre for the Built Environment
- South East Coast Strategic Health Authority
- South East England Conservancy
- South East Marine Association
- Southend-on-Sea Borough Council
- Southern Gas Networks
- Southern Housing Group Limited
- Southern Water
- Spiritual Assembly of the Baha'is of Gillingham
- Splashes Leisure Pool
- Sport England - SE Region
- Sri Guru Ravidass Sabha
- St Mary's Island Residents Association

- St. James Isle of Grain Parish Council
- Stahl Engineering
- Staples
- Startrite Designs Ltd
- Stewart Ross Associates
- Stockbury Parish Council
- Stoke Parish Council
- Stonham Housing (Kent)
- Strood Heritage Society
- Strood Sports Centre
- Strood Town Centre Forum
- Strood Youth & Community Centre
- Strutt + Parker LLP, Planning & Development
- Sure Start Chatham
- Sustrans
- Swale Borough Council
- Swale Housing Association Limited
- Synergy
- Sywell Aerodrome
- Taylor Woodrow Developments Ltd
- Telewest Communications SE
- Telspec Plc
- Tesco Stores Ltd
- Tetlow King
- Thames and Medway Canal Association
- Thames Gateway Kent Partnership
- Thames Gateway NHS Trust
- Thames Gateway Strategic Executive (ODPM)
- Thamesport (London Ltd)
- The Abbeyfield Kent Society
- The Barton Willmore Planning Partnership Eastern
- The Bell Cornwell Partnership
- The Benefits Agency
- The Casino Rooms Entertainment Complex
- The Crown Estate
- The Exchange Bar
- The French Hospital
- The Information Shop For Young People
- The Patman Trust
- The Planning Bureau Ltd
- The Post Office Property Holdings
- The Royal Bank of Scotland
- The Theatres Trust
- The Upnor Society
- The word on the street
- Thurrock Council
- Tim's Travel Ltd
- T-Mobile (uk) Ltd
- Tonbridge and Malling Borough Council
- Tourism South East
- Town and Country Housing Group
- Town Planning Team
- Trail Riders Fellowship
- Tram and Light Rail Society
- Transport for London
- Trenport Investment Ltd
- TT Travel
- Turley Associates
- UGC Cinemas
- University College for the Creative Arts
- University College for the Creative Arts at Rochester
- University of Greenwich at Medway
- University of Kent
- University of Kent at Medway
- Unlock
- Upchurch Parish Council
- Veetee Rice Ltd
- Ventmaster Europe Ltd
- Vigo Parish Council
- Vincent & Gorbing Planning Consultants
- Virgin Active
- Vodafone
- W M Morrisons
- Wainscott Residents Association
- Wakeley Brothers
- Walter & Randall
- Ward Homes Group Ltd
- Watson Day
- Webb Aviation Aerial Photography
- West Kent Badger Group
- West Kent Downs Countryside Forum
- West Kent Health & Social Care Trust
- West Kent Primary Care Dental Service
- Westminster Health Care
- Westminster Pharmaceutical & Paramedics
- White Young Green
- Wilkinsons Hardware
- Women's Aid
- Women's National Commission
- Women's Support Service

- Workers' Educational Association (WEA)
- Wouldham Parish Council
- WYG Planning and Design
- Xchanging Ins-Sure Services
- Young Offenders Institute
- Youth Justice Board

Appendix B

Lodge Hill : Master-Planning consultation bodies

Group	Notes
27 th Scout Group	Community
Allhallows Parish Council	Community
Allhallows Primary School	Community
Arethusa Venture Centre	Community / Business
Arriva (Southern Counties) Ltd	Business
Bishop Gundulph Church	Faith
Bridgewoods Fields Archery Club	Community / Business
British Horse Society	Community
Canterbury Christ Church University	Community / Business
Chatham World Heritage	Community / Business
Chattenden Community Forum	Community (commenced in 2011)
Chattenden Primary School	Community
Chattenden Syndicate	Community / Business
Church in Society	Faith
Cliffe & Cliffe Woods Parish Council	Community
Cliffe Village Club	Community
Cliffe Woods Community Centre	Community
Cliffe Woods Primary School	Community
Cooling Parish Council	Community
Council for Voluntary Services	Community
CPRE Kent	Community
CPRE Medway	Community
Cuxton Parish Council	Community
Dickens Country Protection Society	Community
Diocese of Rochester	Faith
Elms Medical Centre	Community
English Heritage	Statutory
Environment Agency	Statutory
Federation of Small Businesses	Business
Friends of Hillyfields	Community
Friends of North Kent Marshes	Community
Friends of the Earth South East	Community
Frindsbury & Wainscott Community Association	Community
Frindsbury Extra Parish Council	Community
Frindsbury Tennis Club	Community
Grain Parish Council	Community
Greening the Gateway Kent and Medway	Business
Groundwork, Kent & Medway	Community
Halling Parish Council	Community
High Halstow Cricket Club	Community
High Halstow Parish Council	Community
High Halstow Primary School	Community
Higham Parish Council	Community
Highcliffe Medical Practice	Community
Hoo Partnership	Community
Hoo Residents Association	Community

Hoo St Werburgh Parish Church	Community
Hoo St Werburgh Parish Council	Community
Hoo Village Institute	Community
Hope in the Community	Community
Hundred of Hoo Leisure Centre	Community / Business
Hundred of Hoo School	Community (n.b the school has a community manager)
Kent & Medway Fire & Rescue Service	Statutory
Kent Council for Voluntary Youth Services	Community
Kent Economic Board	Business
Kent Ornithological Society	Community
Kent Police Authority	Statutory
Kent Wildfowling & Conservation Association	Community / Business
Kent Wildlife Trust	Statutory
Kingsnorth Climate Action Medway	Community
Locate in Kent	Business
London & Quadrant Community Partnership	Community
Medway Countryside Forum	Community
Medway Enterprise Gateway	Business
Medway Historical Ordnance	Community
Medway Local Access Forum	Community
Medway Older Peoples' Partnership	Community
Medway Pensioners Forum	Community
Medway Primary Care Trust	Statutory
Medway Racial Equality Council	Community
Medway Regeneration Ambassadors	Community
Medway Urban Parks and Greenspaces Forum	Community
Medway Youth Parliament	Community
Mid-Kent College	Community / Business
Natural England	Statutory
Nextstep Kent & Medway	Community / Business
North Kent Chamber of Commerce	Business
Open Spaces Society	Community
Parks Medical Practice	Community
Peninsula Rock	Faith
Peninsula Youth for Christ	Faith
Raise	Community
Ramblers Association	Community
Royal Engineers Angling Club	Community
Royal Engineers Museum & Library	Community / Business
Royal School of Mechanical Engineering	Business
RSPB	Statutory
Rural Liaison Committee	Community Forum - Parish Councils on the Hoo Peninsula
Soroptimists International – Medway Towns	Community
St Margaret Church, High Halstow	Faith
St Mary Hoo Parish Council	Community
St Nick's Day Centre Strood	Community
St Werburgh Medical Practice	Community
Stoke Parish Council	Community
Strood Heritage Society	Community

University of Greenwich	Community / Business
University of Kent at Medway	Community / Business
Upnor Residents Association	Community
Visit Kent	Business
Wainscott Primary School	Community

Appendix C

Pre-application 'basic' measures for major applications

1. Inclusive invitation. Reasonable attempts should be made to ensure that a representative cross-section of the community, the promoter(s) and the Council should be invited to the same event(s), to ensure that all participants are aware of each other's views. Invitations should go to existing local resident associations, community forums, neighbourhood groups and interest groups where they exist or are formed as a result of the proposal. It may be necessary to hold additional events for those groups not traditionally involved in the planning process. Events should be held in accessible locations. In any event, all participants in the involvement process should be asked to put their contact details on record so as to ensure that they receive feedback on the results of involvement.

2. Authorisation. Those representing community groups, the promoter(s), and the Council should be able to show that they are authorised to speak for their organisations. The scale and remit of those organisations should also be made clear.

3. Continuity. Involvement should be a continuous process with the timetable for the period of preparing the plan or making the planning application made clear in advance to the participants. Where involvement is intended to include a series of meetings or events then, as far as possible, the same individuals that represent the community, the promoter and the Council should continue to be involved throughout the process to ensure continuity of views. Nevertheless, it may be appropriate for other participants or advisers to be involved intermittently. However the process

should not be re-run if or when representatives change.

4. Independent advice. Where technical or professional advisers or private consultants are employed as independent facilitators to manage the involvement process, they should have a client duty of care to all parties equally and should be instructed to follow these ground rules, irrespective of the party employing them. Where facilitators or advisers are not independent this should be declared.

5. Early Involvement. Arrangements should be made for the meetings process to begin and for all parties to meet at the early "ideas" stage of the plan or the development preparation process. This is before specific proposals are made, when significant options are still open and can be identified and while there is still the potential to make a difference.

6. Presenting options. The aim should be to set out options or choices that are possible in the way that specific development is carried out, including those suggested by the community that reflect the community's needs, ambitions and experience. Purely oral or written presentations should be avoided so that, wherever possible, options are illustrated in 3 dimensional terms with models and examples of sustainable development best practice in comparable schemes elsewhere (see for example "Towards Good Practice in Sustainable Urban Land Use" ODPM 2004). In generating options the constraints of already adopted national and local planning policy should be made clear as well as the opportunities still open to choice. It may not be possible to include in options issues that are commercially confidential.

7. Choosing between options. The planning criteria for choosing

between options should be made clear and transparent, identifying where a distinction has been made between choices based upon technical and legal argument and choices based purely on opinion.

8. Consensus. Best endeavours should be made to reach consensus making it clear and specific how far the involvement has resulted in agreement to adopt or to alter proposals. Where agreement has not been possible, the reasons and the scale of disagreement should be made clear and specific.

9. Transparent records.

Community involvement meetings should be summarised in a Community Involvement Statement, which will be submitted to the Council as a supporting document. Community Involvement Statements will be provided by the applicant to support relevant planning applications submitted for determination. A Community Involvement Statement will also be prepared and submitted with Local Development Documents for examination.

An opportunity will be given to participants of community involvement meetings to verify Community Involvement Statements before they are submitted to the Council. Participants may provide a written statement of omissions and corrections which will be reported and considered by the council along with the Community Involvement Statement.

10. Feedback on the outcome of community involvement. Those who have supplied their details will be notified of the availability of a report to show, with reasons, how far the recommendation or determination of planning applications or the approval of Local Development Documents has reflected the opinions given by the community and the weight given to

them. For planning applications this will be either the case officers delegated decision report, or the Development Management Area Committee report and minutes. For Local Development Documents this will be the Community Involvement Statement as required by the Town and Country Planning (Local Development) (England) Regulations 2004. Neighbourhood Planning Groups are expected to share the outcome of community involvement with their membership by, for example, their community newsletters.

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ATTACHMENT 10

Regeneration, Community and Culture – 4 October 2011

Local Development Framework – Draft Core Strategy

Discussion:

The Planning Policy and Design Manager introduced the report advising that the six week public consultation period, approved by the Cabinet in August, ran until 14 October 2011. The consultation did not ask for strategic options within the plan (this had been at an earlier stage) but was to test the soundness of what was proposed and to refine the draft document.

The committee was informed that this was an overarching strategic document, with the detail being reserved for subsequent development plan documents but would nevertheless provide a framework for all major planning decisions.

It was recognised that the government had published a draft national planning policy framework, which emphasised the importance of having an up-to-date Local Plan or Local Development Framework. The Planning Policy and Design Manager advised that it was intended to submit the Core Strategy as soon as possible so that such a plan was in place to control speculative development, especially on Greenfield sites.

Members congratulated officers for this comprehensive and wide-ranging draft strategy and the work that had been undertaken in the preparation of the documentation. The subsequent questions were responded to as follows:

- paragraph 4.22 – water supply in Medway
Medway being one of the driest parts of a water-stressed region in the country, are officers certain that the proposed new developments can be supplied with the necessary water provision?

Officers responded that they had held detailed discussions with Southern Water and the Environment Agency and had received all the assurances they could reasonably expect. In policy terms, apart from the installation of water meters, a lot would depend on what happened elsewhere in the region.

- paragraph 4.30 – waste heat from the new coal power station at Kingsnorth was the thermodynamic information reliable?

After the planning application for the power station had been submitted, two feasibility studies looking at the potential for district heating were produced by Eon. These indicated the potential for the equivalent of heating potential for 100,000 homes. This paragraph had been included in the strategy on the basis of those studies.

- Policy CS25 – River Medway – preservation of wharfs and port capacity the council should identify the wharfs worth keeping and preserve them, especially with the large areas identified for housing development. Members were pleased to see reference to keeping the river and port as a working area.

Officers pointed out that all major wharfs were already protected and it was intended that this protection would be retained over the longer term.

- References to Rochester Airport/Airfield why are these defined separately in different places throughout the document?

Officers advised that the term 'airfield' was used to describe the locality, which included the airport. The term 'airport' was used to define the specific operational aviation facility. This was a long-term reference that had been used to avoid confusion.

- Heritage assets referred to within the documentation does not contain any reference to the aviation history within Medway and would like a reference added where appropriate.

Officers agreed to consider this addition to the draft Core Strategy.

- Medway Means Business Programme, Members were unaware of this programme and asked how the council promoted this?

Officers responded that the council was working on a new economic development website which would be an easy way for businesses and prospective businesses to find out about this.

- Why was there no reference to restricting the number and concentration of hot food takeaways, as this was a particular request of the Planning Committee?

Officers responded that the Core Strategy was about strategic matters and was not site specific. They confirmed that they were aware of Members concern about takeaways and it was planned to produce a Supplementary Planning Document about this issue, when the resources were available to produce it. Otherwise, there would be a reference to this in a future Land Allocations document.

- Child assessment centres and children's homes, is there any reference to these within the document?

Officers responded that there was a promotional aspect for these facilities within the strategy but it would not be site specific. It was difficult to forecast ahead for the numbers and locations needed. Officers wanted to identify land to help these services but were dependent on the services providing the specific information and requirements.

- Page 117 – new housing in Gillingham, with regard to the figures for Gillingham (886 new units on large sites and 487 additional units on other sites), what level of detail has been considered to get to these numbers in such a densely populated, urban area with little green space?

Officers responded that superficially the figures for Gillingham might seem high but they comprised sites that had already been identified and had planning permission. There were no new allocations in the figures.

- Houseboats, there is no reference to this within the Core Strategy and the numbers were increasing and they should be considered.

Officers indicated that this matter would be dealt with in the forthcoming allocations document.

Decision:

The committee agreed to:

- (a) note the contents of the Local Development Framework: Draft Core Strategy;
- (b) note the comments from Members and officer responses and refer these to the Cabinet for consideration;
- (c) recommend that Cabinet proposes to Council the adoption of the Local Development Framework: Draft Core Strategy in due course.

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