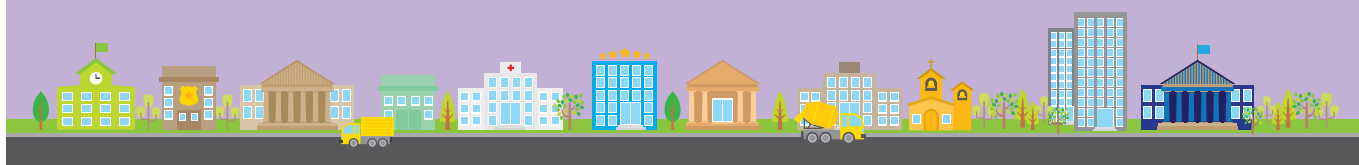


Medway Council Local Plan 2012-2035

Development Strategy
Regulation 18 consultation report



March 2018

medway.gov.uk/futuremedway

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Executive Summary

Medway Council is preparing a new Local Plan to provide direction on the future growth of the area. The aim of the Local Plan is to ensure that Medway grows sustainably, to provide land for the homes, jobs, infrastructure and services that people need, whilst protecting and enhancing the qualities of the area's environment and heritage. The Local Plan shares the ambitions of the council's regeneration strategy, 'Medway 2035' for a successful waterfront University city noted for its revitalised urban centres, its stunning natural and historic assets, and countryside.

The Local Plan seeks to manage change in ways that benefit Medway's people and its environment. It considers how we can accommodate new development, without damaging the quality of life and our environment. It looks at how we can help address inequalities in health, social and economic opportunities. It sets out where we need to upgrade infrastructure and services. It reflects how the area and our lives have changed over recent decades, and how we need to plan for future changes in how we live, work, travel, use services and socialise.

This document represents the third formal round of consultation that will inform the content of the new Local Plan. It is grounded in a wide ranging evidence base, including development needs, transport, and environmental issues, and technical assessments of the potential impacts arising from development and policy approaches.

This work has confirmed that urban regeneration continues to form the foundation for Medway's growth, with the potential to make the best use of land and extend opportunities for all. However a wider supply of land is required to meet the full range and mix of development needed. Infrastructure is a major constraint to delivering growth in Medway. The council has assessed that the strongest means of securing the infrastructure improvements needed in Medway, is through strategic scale development linked to upgrades to transport, education, health and wider services to enable new housing. An option has been identified to develop a small rural town based around Hoo St Werburgh. The plan would direct a smaller proportion of growth towards suburban and village expansion, recognising the difficulties to mitigate infrastructure pressures in such areas.

This consultation document presents four development options based around variations of the sequential approach to growth outlined above:

- Meeting objectively assessed need for housing of 29,463 homes by 2035
- Investing in infrastructure to unlock growth
- Meeting Government's proposed calculation of local housing need of 37,143 homes by 2035
- Consideration of development within Lodge Hill SSSI

The document also sets out suggested policies that would guide development to achieve the ambitions set for Medway's sustainable growth.

The consultation on the Development Strategy document runs from 16 March to 11 May 2018. Further details, including supporting and background documents are available on the council's website at: www.medway.gov.uk/futuremedway.

SECTION 1

INTRODUCTION

- 1.1 The council is preparing a new Local Plan for Medway to provide direction on the future growth of the area. It seeks to manage change in ways that benefit Medway's people and its environment. The aim of the Local Plan is to ensure that Medway grows sustainably, and to provide land for the homes, jobs and services that people need, whilst protecting and enhancing the qualities of the area's environment and heritage. The Local Plan looks forward to 2035, considering which areas are most suitable for development, and which places need protecting. The plan, once adopted will replace the 'saved' policies in the 2003 Medway Local Plan and the Kent Waste and Minerals Local Plans. It will be used as the basis for making decisions on planning applications.
- 1.2 Government considers that development is best managed where there is an up-to-date Local Plan in place to set out a framework for growth and policies for managing development. The Local Plan is prepared by the council, in consultation with local people, businesses, groups and organisations that have an interest in the area. Medway Council believes the new Local Plan will provide a strong basis for promoting better opportunities for local people, and securing a successful future for the area.
- 1.3 In preparing the Local Plan, the council needs to meet requirements set by Government on how the plan is produced, and what issues it must consider. The National Planning Policy Framework¹ (NPPF) represents the Government's planning policies for England and how they are expected to be applied. The Government makes clear that the purpose of planning is to contribute to the achievement of sustainable development. The planning system performs three key roles in delivering sustainable development:
- An economic role – contributing to building a strong, responsive and competitive economy;
 - A social role – supporting strong, vibrant and healthy communities, including the provision of a supply of housing required to meet the needs of current and future generations;
 - An environmental role – contributing to protecting and enhancing our natural, built and historic environment.
- 1.4 The NPPF establishes a presumption in favour of sustainable development. For plan making this means:

¹ Department for Communities and Local Government, 'National Planning Policy Framework', 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
 - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
 - specific policies in the NPPF indicate development should be restricted (such as Special Protection Areas and Special Areas of Conservation, Sites of Special Scientific Interest, land designated as Green Belt, an Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding).
- 1.5 The council is adhering to Government policy in preparing a new Local Plan for Medway, in planning positively for the development and infrastructure required in the area in line with the objectives, principles and policies of the NPPF.

Preparing the new Local Plan

- 1.6 The council has set out its timetable for preparing the new Medway Local Plan in the Local Development Scheme, 2018². This aims to produce a plan that can be submitted for independent examination in 2019.

Key milestones for Medway Local Plan

Stage	Date
Regulation 18 – Issues and Options consultation	Jan-Feb 2016
Regulation 18 – Development Options consultation	Jan-May 2017
Regulation 18 – Development Strategy consultation	March-May 2018
Regulation 19 – Publication of draft plan	Winter 2018
Submission of plan for Examination	March 2019
Adoption (determined on outcome of Examination)	2020

- 1.7 This consultation document represents work on the emerging Local Plan for Medway. It builds on the work carried out at earlier stages of consultation and an evidence base of technical documents assessing key matters and informing the direction of the plan.
- 1.8 The comprehensive evidence base includes research and assessment work specifically commissioned for the preparation of the plan, together with strategic documents and plans that are integral to defining the key issues to be addressed in

² Medway Council, 'Local Plan Development Scheme 2018-2020', Jan 2018, Available at: <http://www.medway.gov.uk/pdf/Medway%20LDS%20Jan%202018.pdf>

the Local Plan. Details of the supporting evidence base documents prepared for the Medway Local Plan are available on the council's website³.

- 1.9 Work is continuing in collating and strengthening the evidence base, so that it is up-to-date and provides a robust basis for the publication of the draft Local Plan.

Issues and Options Consultation

- 1.10 In December 2015, the council published an 'Issues and Options'⁴ technical consultation document as the first formal stage in preparing a new Local Plan. Consultation was carried out in January and February 2016. The council contacted over 1000 people and groups directly through its Local Plan consultation database, as well as using wider council and partner organisations to raise awareness of the consultation document and encourage people to respond. A number of thematic stakeholder events were organised, including discussion of environmental, health, housing, economic and strategic issues. The council also held meetings and exhibitions in villages and towns across Medway, and attended partnership meetings to discuss the emerging Local Plan.
- 1.11 Over 200 written responses were received from a wide range of local residents, statutory organisations, businesses, interest and community groups, land owners and developers. The representations made reflected the interests of the diverse stakeholders, and there were differing views on the scale of development needed in the area, and how the Local Plan should respond. However there was some shared understanding that development was needed to provide for homes, jobs, services and facilities in the area. Concerns were largely expressed about the impact of potential development on existing transport networks, services and facilities, and the local environment. There were strong views that housing growth could not be seen separately to delivery of infrastructure, such as transport, healthcare, schools and parks.
- 1.12 Information provided in the responses received on the 'Issues and Options' document is available to view on the council's website.⁵ An overview of this initial consultation stage is set out in a report⁶ also available on the Local Plan pages of the website.

Development Options Consultation

- 1.13 In January 2017, the council published a 'Development Options'⁷ technical document for consultation as the next stage in the preparation of the Local Plan. It provided an

³ Medway Council, 'Local Plan Evidence Base', Available at:
<http://www.medway.gov.uk/planningandbuilding/planningpolicy/localplanevidencebase.aspx>

⁴ Medway Council, 'Medway Council Local Plan- Issues and Options 2012-2035', Available at:
<http://www.medway.gov.uk/PDF/Final%20Issues%20and%20Options%20Public%20Consultation%20Copy.pdf>

⁵ Medway Council, 'Issues and Options', Available at:
<http://www.medway.gov.uk/planningandbuilding/planningpolicy/localplan-futuremedway/issuesandoptions.aspx>

⁶ Medway Council, 'Issues and Options Consultation- Summary Report', March 2017, Available at:
<http://www.medway.gov.uk/pdf/Issues%20&%20Options%20Consultation%20Responses%20Report%20-%20March%202017.pdf>

⁷ *ibid* 6

assessment of the current context for Medway's economic, social and environmental conditions and the key issues that need to be addressed in planning positively for the area's future over the lifetime of the Local Plan.

- 1.14 The document set out a draft vision and strategic objectives that should underpin the approaches to managing Medway's sustainable growth. It set out the council's ambitions for accommodating development of housing, jobs, shops, services and infrastructure, whilst strengthening the natural networks of the river, countryside and parks, and celebrating the area's history. It included emerging approaches to policies to address the key issues facing Medway's communities, economy, and environment. It presented four scenarios providing alternative approaches to meeting Medway's growth needs over the plan period. These high level options were:
- Maximising the potential of urban regeneration
 - Suburban expansion
 - Hoo Peninsula focus
 - Urban regeneration and a rural town
- 1.15 The scenarios attracted the main focus of representations to the consultation. Over 330 written responses were received to the consultation, outside of over 11,000 made in specific reference to a campaign promoted by RSPB against development at Lodge Hill, and the relocation of Gillingham Football Club. Over 650 people attended the exhibitions organised across Medway by the Planning Service.
- 1.16 There was general support for regeneration to bring investment into town centres and the urban waterfront. However there were mixed views on the ability to concentrate much of the growth on regeneration sites, due to concerns with viability, delivery of infrastructure, transport provision and impacts on the natural and historic environments. The reaction to the potential for development on 'greenfield' sites in suburban and rural locations varied significantly. A number of developers and agents actively promoted sites in these locations through the plan consultation. Local people and community groups frequently raised much concern about development in such locations, particularly in relation to the scale of growth and the impact on infrastructure and the environment.
- 1.17 The responses were collated and analysed and specific matters identified. Copies of the responses received to the Development Options consultation have been published on the Local Plan webpage of the council's website⁸, together with a report⁹ outlining the main issues raised during the consultation.

⁸ Medway Council, 'Development Options', Available at:
<http://www.medway.gov.uk/planningandbuilding/planningpolicy/localplan-futuremedway/developmentoptions.aspx>

⁹ Medway Council, 'Medway Local Plan 2012-2035: Report on Development Options Consultation 2017', Available at:
<http://www.medway.gov.uk/pdf/Local%20Plan%20Development%20Options%20summary%20report.pdf>

- 1.18 All development scenarios made reference to Lodge Hill as a potential development site, subject to the outcome of a Public Inquiry that was planned for 2018. The potential development of land at Lodge Hill shown in the consultation materials would involve a designated Site of Special Scientific Interest. Through the consultation, strong representations were made by a number of bodies, including Natural England and RSPB, that the inclusion of Lodge Hill in all options failed to demonstrate that the council had given due consideration to all 'reasonable alternatives'. The council has responded by carrying out an additional stage of consultation prior to the publication of the council's preferred development strategy in the draft plan. This 'Development Strategy' consultation represents this approach.

Development Strategy Consultation

- 1.19 The council has reviewed the comments received to earlier rounds of consultation and used its updated evidence base and further technical assessments to prepare this Development Strategy document for consultation. The Development Strategy document carries forward the draft vision and strategic objectives presented at the Development Options stage, as these received general support through the consultation.
- 1.20 This document evolves the assessment of potential approaches to delivering development in Medway. It provides further direction on a growth strategy that responds to the vision and strategic objectives set for the plan. It takes a sequential approach to identifying the most sustainable locations for development, identifying sites and broad locations for potential allocations in the Local Plan. Four scenarios are set out for consultation, representing variations on how growth could be delivered in line with the overarching development strategy. The document also includes the further refinement of draft policies for the Local Plan, and invites consideration of alternative approaches, before policies are presented in the next stage of the draft plan. Further detailed development management policies will be presented in the draft plan.
- 1.21 The Development Options consultation document is informed by a Habitats Regulation Assessment and Sustainability Appraisal. These documents consider the potential impacts of the proposed development allocations and draft policies on the environment, and social and economic conditions. The reports are published alongside the Development Strategy document for consultation. Further iterations of these assessments will be produced for the draft Local Plan.

How to get involved in the preparation of the Local Plan

- 1.22 The council welcomes views on this Development Strategy document. It has produced a form to provide guidance on how to make your comments. This is available online on the council's website, and at public libraries and the council's offices at Gun Wharf. Consultation responses will be taken into account in setting out a preferred development strategy, site allocations and supporting policies for the new Local Plan. There will be a further opportunity to comment when the council publishes its draft plan.
- 1.23 The consultation will run from **Friday 16 March to 5pm on Friday 11 May 2018.**

All comments must be submitted in writing to the council by 5pm on Friday 11 May 2018, so that they can be considered as part of this formal consultation stage.

You can submit comments in the following ways:

By post:

Planning Policy
Regeneration, Culture, Environment & Transformation
Medway Council, Gun Wharf
Dock Road, Chatham, Kent ME4 4TR

By email:

futuremedway@medway.gov.uk

Copies of this consultation document are available to view at public libraries across Medway, at the reception desk at the council offices at Gun Wharf, during opening hours, and online at: www.medway.gov.uk/futuremedway

You can find details of the opening hours of the council offices and libraries at: www.medway.gov.uk or by telephoning 01634 333333.

This information can be made available in other formats from 01634 333333

If you have any questions about this document and you want to speak to someone in your own language please ring 01634 335577

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ગુજરાતી	331782	Polski	332373	اردو	331785	Lietuviškai	332372

MEDWAY IN 2035 - VISION AND STRATEGIC OBJECTIVES FOR THE LOCAL PLAN

Context

- 2.1 Medway sits at the mouth of its great river on the north Kent estuarine coast, bordered by the Thames to the north and the Kent Downs to the south. The five historic towns linked by the A2 form a complex urban conurbation, which retains the distinct identities of the individual towns and suburbs. Sitting close to the countryside, the urban area is surrounded by a network of villages on the Hoo Peninsula and the Medway Valley, alongside marshes and mudflats, wooded hills, productive farmland and strategic energy and minerals operations built up around the wharves. Much of the countryside and estuary is of international importance for its environmental qualities, including designated Special Protection Areas, Sites of Special Scientific Interest, and the Kent Downs Area of Outstanding Beauty. Land to the west of the borough forms part of the London metropolitan Green Belt.
- 2.2 Medway is one of the largest urban areas in the south east, and has been growing rapidly in recent years to a population of 278,542 by 2016¹⁰. The population has a slighter younger age profile than the Kent and England averages, and reflecting national trends has an increasing number of people over 65 years. This has implications for planning services such as health and education, and ensuring ease of access to local services and facilities. The Local Plan must take account of the changes and growth in Medway's population. In common with other areas, particularly in the South East, Medway has seen steady growth in recent years, and this is projected to continue over the life of the local plan, to expand the area's population by circa 18% by 2035. This growth is currently projected to reach a population of 330,200 people in 2035¹¹. In contrast to other areas in Kent, much of Medway's growth is from natural change, with births outnumbering deaths. This shows through in demand for health and education services.
- 2.3 Medway is the second largest urban area in the South East after Brighton & Hove, and similar in size to cities such as Plymouth. However Medway does not enjoy either the recognition, or the range of services and facilities that of a city of this scale warrants. This may reflect the polycentric pattern of Medway's urban area, with the five main towns each providing their own centre, and key destinations and attractions being spread across Medway, rather than clustered in one city centre. Medway's

¹⁰ Office for National Statistics, 'Population estimates for UK, England and Wales, Scotland and Northern Ireland: Mid-year Estimate, 2016', Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/latest>

¹¹ Office for National Statistics, 'National Population Projections: 2014-based Statistical Bulletin', Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2015-10-29>

growth needs to respect the distinctiveness and history of its separate towns and villages. However, as Medway grows, it is essential that the area secures the economic, commercial, community and cultural facilities fitting to its city scale.

- 2.4 Medway benefits from a stunning landscape setting, rich heritage, high speed train links, universities, a strategic location in the Thames Gateway, and a diverse offer of services and businesses. However there are areas which need addressing. Medway's economy and skills levels are weaker than competing areas. There are marked inequalities in health, with life expectancy shorter for our residents. Medway is often unfairly associated with negative perceptions. The town centres are not always seen as attractive destinations and vibrant hubs for community activities, and they have suffered from the structural changes in retail patterns which have been seen across the country. In particular Chatham does not provide the scale of retail and leisure facilities that would be expected for a city of its size, and the centre for wider Medway. Transport networks reflect historic routes, local topography and the geography of a mature river, and there are noted areas of congestion and pressure on highways. Our ambitions should seek to realise the added economic value that a city should provide.
- 2.5 Medway's economy lags behind both the county and national averages. Productivity runs at 70% of the national performance, and at two-thirds of the regional level. Skills levels are notably lower in Medway. Medway's productivity measured by GVA (Gross Value Added) is amongst the lowest in the South East region, but is showing marked signs of strengthening, with the annual rates of growth running above the regional and national averages. Despite being the largest city in Kent and one of the largest in the South East region, Medway has yet to achieve its full economic potential.
- 2.6 The closure of the Dockyard in the 1980s dealt a severe blow to the local area, and Medway has been through much change in the subsequent decades. There is a well-established urban regeneration programme that has brought universities to Medway, with over 10,000 students, infrastructure investments in high speed rail services on HS1, the Medway Tunnel, road schemes and railway stations, and new residential, commercial and leisure areas. Key employment sites, such as London Medway Commercial Park at Kingsnorth on the Hoo Peninsula have benefitted from infrastructure upgrades and have attracted new businesses to the area. The council is committed to the continuation of the regeneration programme and this will be at the core of the strategy for the new Local Plan.
- 2.7 The scale of growth Medway is experiencing is challenging. The population has increased by over 13,500 people in the last 5 years, one of the fastest growing areas in Kent. However, the rate of growth has slowed significantly in the last couple of years. Local people are experiencing the impacts of growth, and are concerned that further increases will result in a deterioration of the quality of life in Medway, placing pressures on infrastructure and services, leading to increasing delays in moving around Medway, longer waits for health services, more competition in getting school places, loss of green spaces and the views that people currently enjoy, and new houses going to people moving into Medway.

- 2.8 A key task for the Local Plan is to manage growth to achieve a more successful, attractive Medway with healthier communities that share in the benefits of development. Development should be seen to deliver benefits – better housing for local people, higher quality jobs, new services and facilities such as schools and parks. Growth can boost the economy, improve our town centres, turn derelict and underused land into attractive modern places to live, work and visit, and achieve the city scale facilities that Medway warrants.
- 2.9 Growth does not mean losing the character of the area. Medway's history, countryside and the river provide the context for future development. The natural surroundings and built environment defines Medway, and will be at the core of the Local Plan. The development strategy must show how we can provide land for housing, jobs, infrastructure and services, whilst protecting important environmental and heritage assets, retaining and strengthening the green infrastructure links for people and wildlife. Over 250,000 people live in the urban area made up of the five towns and suburbs from Strood to Rainham. The open spaces and countryside in and around the large conurbation are highly valued, and form an important component of Medway's character. The countryside to the south of Medway, and on the Hoo Peninsula has retained a distinct sense of place, strongly distinguished from the nearby towns. Medway also enjoys a rich and diverse historic environment, reflecting its military, industrial, ecclesiastical and cultural past. These characteristics need to be embedded in the emerging strategy for the new Local Plan.

Policy Context

- 2.10 The Local Plan is being prepared in conformity with national planning policy and guidance. The council has also had regard to key government strategies and documents in defining the important issues and approaches to be taken in the Local Plan. The Housing White Paper, 2017¹², the Industrial Strategy, 2017¹³, and the 25 Year Environment Plan, 2018¹⁴ are highlighted as some of the main strategies that provide direction on significant matters for the Medway Local Plan.
- 2.11 The emerging Local Plan forms part of the council's policy context. It provides the spatial direction for Medway's growth that aligns to the overarching ambitions for the area. The council is committed to providing the civic leadership to achieve Medway's potential as a successful vibrant modern city that celebrates its heritage and close links to the river and countryside, and where all residents can share in opportunities

¹² Department for Communities and Local Government, *'Fixing our broken housing market'*, February 2017, Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

¹³ HM Government, *'Industrial Strategy; Building a Britain fit for the future'*, Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf

¹⁴ HM Government, *'A Green future: Our 25 year plan to Improve the Environment'*, Available at :
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

to improve their lives, health and wellbeing. A number of key strategies and plans that provide direction for the vision and strategic objectives for the Local Plan are noted below.

*Medway Council Plan, 2016-2021*¹⁵

2.12 The Medway council plan sets out three key priorities for the area:

- A place to be proud of
- Maximising regeneration and economic growth
- Supporting Medway's people to realise their potential

2.13 The council plan promotes Medway as a great place to work, live, learn and visit, supported by strategies for culture, tourism and regeneration. The council priorities provide a strong basis for the Local Plan in planning positively for Medway's needs, boosting the economy, improving access, delivering new homes, improving residents' health and wellbeing, and caring for the environment. The council aims to boost economic performance through supporting local businesses and attracting inward investment, and targeting the creation of high skilled jobs. Allied to this are aims to raise skills levels and open up employment opportunities for young people. The council plan specifically supports the preparation of the Local Plan to progress the delivery of the regeneration programme and providing homes to meet the need of Medway's residents.

*Joint Health and Wellbeing Strategy for Medway, 2012-2017*¹⁶

2.14 The five key themes are working together to:

- Give every child a good start in life;
- Enable our older population to live independently and well;
- Prevent early death and increase years of healthy life;
- Improve physical and mental health and wellbeing;
- Reduce health inequalities.

2.15 This Strategy seeks to improve the health of Medway's communities, particularly as many residents experience poorer standards of health than national, regional and Kent averages. Promoting healthy eating and physical activity are central to improving health. Planning can help contribute to healthier food environments, such as managing the availability of fast food outlets, and can support increased access to opportunities for physical activity, including formal provision of sports facilities and parks, and making it easier and more enjoyable to walk and cycle as part of daily routines. The natural environment plays an important role in promoting physical and mental health and wellbeing. In the Strategy, Medway aims to be a dementia-friendly community. Planning has a role to play in making it easier for people to move around

¹⁵ Medway Council, 'Council Plan 2016/17 to 2020/21, 2017/18 update', Available at: <http://www.medway.gov.uk/pdf/Council%20Plan%202017-18%20v4.pdf>

¹⁶ Medway Council, 'Joint Health and Wellbeing Strategy for Medway 2012-2017', Nov 2012, Available at: <http://www.medway.gov.uk/pdf/Joint-Health-and-Well-being-Strategy-for-Medway-2012-2017.pdf>

and to access local services and facilities. Actions to address disadvantage across Medway, through better housing, raising education and skills levels, and employment will contribute to reduction of health inequalities. The Health and Wellbeing strategy is at the early stages of being reviewed.

- 2.16 A draft Kent and Medway Health and Social Care Sustainability and Transformation Plan (STP)¹⁷ has been prepared that set outs the framework for the integration and planning of health and social care services and facilities. This has implications for the delivery of health care, and the facilities needed across Medway.
- 2.17 Medway sits within the Thames Gateway regeneration area, and over past decades has secured investment to realise ambitions for growth and redevelopment of underused land. This is a key component of wider regional development and investment planning through the Thames Estuary Growth Commission, South East Local Enterprise Partnership, and supporting partnerships.
- 2.18 The SE Local Enterprise Partnership has secured three rounds of Local Growth Funding from Government, based on its 2014 Strategic Economic Plan. It is currently updating its plan, and the evidence base¹⁸ collated to date confirms the importance of the region in driving growth across the whole of the UK. Medway as part of the North Kent Innovation Zone has benefitted from Local Growth Fund investments in boosting infrastructure and strengthening the economy. More locally Medway Council participates in the Thames Gateway Kent Partnership, and plays a key role in meeting the ambitions for successful growth.

Thames Gateway Kent Plan for Growth, 2014-2020¹⁹

- 2.19 This establishes a vision for North Kent as:
- An area of exciting towns and cities complemented by an outstanding natural environment, providing an exemplar of urban regeneration.
 - A thriving business centre attracting leading investors and businesses through its diverse and skilled workforce, high-quality commercial sites and local services, and accessibility to transport links and strategic routes to UK and continental markets.
 - An area of strong, integrated communities with harmony between new and existing businesses and residents – where the benefits of development and investment are shared by the whole community.

¹⁷ MTW.NHS, 'Transforming health and social care in Kent and Medway: Sustainability and Transformation Plan', Oct 2016, Available at: <https://www.mtw.nhs.uk/wp-content/uploads/2016/10/20161021-Kent-and-Medway-STP-draft-as-submitted-ii.pdf>

¹⁸ South East Local Enterprise Partnership, 'South East LEP (SELEP) Strategic Economic Plan Evidence Base', Sept 2017, Available at: http://www.southeastlep.com/images/uploads/resources/South_East_LEP_Strategic_Economic_Plan_Evidence_Base_FINAL.pdf

¹⁹ Thames Gateway Kent Partnership, 'Plan for Growth 2014-2020', Available at: <http://www.tgkp.org/content/documents/TGKP%20Growth%20Plan%20May%202014%20Final.pdf>

- A vibrant cultural hub with a thriving social scene and civic pride – attracting a growing student population, bringing youth and vigour to the community.

Medway 2035: University Waterfront City, connecting innovation, people and place

2.20 Medway has a long standing commitment to regeneration, and a number of strategies, development briefs and masterplans have informed the transformation of the waterfront and urban areas over recent decades. As the regeneration programme continues, strategies and plans need to be refreshed. A new Regeneration Strategy, Medway 2035, has been drafted and is published for comments alongside this Development Strategy consultation document. There is strong alignment between the Local Plan and Medway 2035, promoting regeneration and sustainable growth. Medway 2035 complements the Local Plan by developing a structured routemap in support of the policies which will frame expected growth, and setting out a vision of the future Medway which these policies will help secure. If the Local Plan exists to manage growth, Medway 2035 exists to deliver it. The strategy is built around 8 priorities:

- Destination and place making – including promotion of key regeneration and development areas and strengthening the role of town centres
- High value jobs and productivity
- Inward investment
- Local employment
- Innovation
- Business accommodation
- Sector growth
- Improving employability

Medway's Cultural Strategy 2014-2019

2.21 Culture is an important facet of Medway's community life and its economy. It provides key regeneration and growth opportunities, through new businesses, facilities and in planning for public places.

There are four strategic priorities:

- Stewardship – preserve, interpret and enhance Medway's heritage, green spaces and public realm for the enjoyment and benefit of current and future generations
- Engagement – increase active engagement and satisfaction with cultural activities to improve quality of life, providing the essential place-making for the significant regeneration that is taking place in Medway
- Prosperity – harness and foster the creative talent within Medway and maximise the opportunities the universities and further education, tourism, creative sector and cultural offer create for Medway's economy.
- Wellbeing – increase active participation to address obesity, mental and spiritual health, promoting active minds, bodies and lifestyles and seeking to address social isolation.

- 2.22 The Cultural Strategy highlights that cultural activities in Medway can offer economic opportunities, contribute to transforming perceptions of the area, and promote healthy and cohesive communities. It recognises the value of celebrating the best of Medway's past and natural heritage whilst nurturing new activities and outlooks.

Strategic Issues

- 2.23 Medway occupies an important strategic position in north Kent. Historically this importance has been seen in its military and industrial roles. Today, there are close links to London through road and rail, strategic wharves for the importation of aggregates and other materials on the Medway and Thames estuary, energy installations, internationally important habitats along the north Kent coast, and business, learning, civic, and community services provided in one of the largest urban areas in the south east. Medway is of regional and national importance in the importation of aggregates and the energy industry. The Medway Maritime hospital trust serves residents in parts of Swale.
- 2.24 There are significant cross boundary strategic considerations. Medway is part of the Thames Gateway regeneration programme that seeks to raise economic success and boost the delivery of infrastructure and housing. There is an ambitious agenda for growth, underpinned by nationally significant infrastructure, such as the Lower Thames Crossing. The Government is proposing a route that connects Kent and Essex to the east of Gravesham. The route would sit close to the Medway boundary and is an important consideration in assessing travel patterns and setting the direction of the Local Plan. The development of Ebbsfleet Garden City is underway and proposals for the London entertainment resort on the Swanscombe peninsula are being advanced. Such strategic scale developments could have implications for Medway.
- 2.25 Although two-thirds of house moves in Medway come from existing residents, there are also moves in and out of Medway. Apart from the influence of the London housing market, people moving into the area generally come from places close by, such as parts of Gravesham, Swale and Maidstone. Similarly people moving out of Medway tend to look to neighbouring areas, such as Swale, Maidstone and Tonbridge and Malling. Monitoring has shown that migration patterns have been very variable in recent years. There are commuting links to surrounding areas, such as Maidstone and Tonbridge and Malling, and to London.
- 2.26 Bluewater has a sub-regional shopping role, and has a major impact on retail patterns across the area, drawing over a quarter of all comparison spend from Medway. The expansion of the leisure offer at Bluewater will have further implications for Medway's town centres.
- 2.27 The council works in partnership to secure the natural environmental features of the estuarine landscapes of the north Kent coast, and the natural beauty of the Kent Downs. Coordinated working at a landscape scale is essential to the conservation and enhancement of the natural environment. Medway Council has played a leading role in the establishment of the Strategic Access Management and Monitoring

Scheme that addresses the risk of recreational disturbance on the designated Special Protection Areas and Ramsar sites along the Thames, Medway and Swale estuaries.

Duty to Cooperate

2.28 Medway Council has been preparing its new Local Plan with regard to the Duty to Cooperate on cross boundary strategic issues. The Duty to Cooperate, introduced in the Localism Act 2011, places a legal duty on local planning authorities to co-operate with one another and with county councils and other prescribed bodies. This is to maximise the effectiveness within which 'activities, such as preparation of development plans, are undertaken as far as they relate to strategic matters. Government policy as set out in the NPPF directs 'local planning authorities to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans'. These strategic priorities are wide ranging and include:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.29 Government has published²⁰ proposed details of further requirements on local planning authorities for a joined up approach to cross border issues. The council will be expected to produce a 'statement of common ground' over the housing market area, or other agreed geographical area where appropriate. It is proposed that the statement will set out the strategic cross-boundary matters, including the housing need for the area, distribution and proposals for meeting any shortfalls. Medway Council will respond to the further guidance to be published in the update to the National Planning Policy Framework, and use the new statement of common ground to support its plan making process.

2.30 To effectively coordinate actions on strategic matters in the new Local Plan, the council has made use of established partnerships and collaborative working structures to share information, raise issues and where appropriate develop joint evidence base documents, plans and actions. This includes work on regeneration,

²⁰ Department for Communities and Local Government, '*Planning for the right homes in the right places: consultation proposals*', Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Homes_Consultation_Document.pdf

economic development, infrastructure planning, waste, minerals, and environmental management. The authorities share concerns about the ability to deliver sustainable growth, through securing significant infrastructure improvements and mitigating pressures on the environment, such as air quality. There is strong commitment to joint working on strategic approaches.

- 2.31 The council has also undertaken specific work in connection with the preparation of the Local Plan to ensure that the Duty to Cooperate is met. This has included Duty to Cooperate stakeholder events held during consultation on the emerging plan, 1:1 meetings with local planning authorities, statutory organisations and other Duty to Cooperate bodies. The council reports on these activities in the annual Authority Monitoring Report²¹, and has recorded discussions as part of the plan making process.
- 2.32 The council has taken account of the plans and programmes that influence the future of the area. These include the adopted and emerging Local Plans for neighbouring local planning authorities and the London Plan. The cumulative impacts of proposed development and policies are explicitly considered in the Sustainability Appraisal and Habitats Regulation Assessment processes informing the Medway Local Plan. Proposed changes to the strategic transport networks, particularly roads and rail, are of critical importance to Medway. There is close working with the relevant bodies to assess the impacts of new infrastructure, such as the Lower Thames Crossing, and wider developments. The council seeks to influence the design and service delivery of the strategic networks to meet the economic, social and environmental needs of Medway.

Neighbourhood Plans

- 2.33 Communities are encouraged to prepare neighbourhood plans for their local areas. Once formally 'made', the neighbourhood plan forms part of the Development Plan and therefore provides a policy basis for planning decisions. In Medway, there is currently one area designated for preparing a neighbourhood plan. The parish of Cliffe and Cliffe Woods is working on drafting its neighbourhood plan. Further areas in rural and urban Medway have expressed interest in developing neighbourhood plans, but have not yet started the formal designation process.
- 2.34 Medway Council has worked with the Cliffe and Cliffe Woods neighbourhood planning groups to share information, support joint events and coordinate policy approaches between the Local Plan and neighbourhood plan. The council will similarly engage with other Parish Councils and Neighbourhood Forums that may come forward in Medway to produce a neighbourhood plan.

²¹Medway Council, 'Authority Monitoring Report 2016-2017', Vol. 1, Available at: <http://www.medway.gov.uk/planningandbuilding/planningpolicy/authoritymonitoringreport.aspx>

Developing a vision for 2035

By 2035 Medway will be a leading University waterfront city of 330,000 people, noted for its revitalised urban centres, its stunning natural and historic assets and countryside.

Medway will have secured the best of its intrinsic heritage and landscapes alongside high quality development to strengthen the area's distinctive character. The urban waterfront and traditional centres will have been transformed into attractive locations for homes, jobs, leisure and cultural activities. The river will be celebrated as the defining feature linking historic and new development, and extended riverside access will connect communities and destinations.

Medway will have established a regional profile for successful and ambitious growth and accrued benefits from wider strategic developments. New development in Medway's towns and villages will have responded positively to the character of the surrounding environment and needs of existing communities.

Planned growth will have delivered a city that its residents have pride in, providing homes for all sectors of the community, supported by infrastructure to deliver education, transport, health and community services. Vibrant and complementary town, local and village centres will provide a focus for community life.

The distinct towns and villages that make up Medway will be connected through effective transport networks, with green infrastructure links supporting nature and healthy communities, and defining separation between settlements. The quality of design and public realm will have delivered an accessible city where all can move around safely, and which sets a new character for urban centres.

Inequalities in health, education, economic and social opportunities will be reduced.

Medway will have successfully grown its economy, capitalising on its learning quarter of higher and further education providers to raise skills levels; gaining competitiveness from its strategic location, delivering high speed broadband services to businesses and communities; securing and developing its diverse business base and attracting inward investment in a range of quality employment sites.

Medway will be defined by development that respects the character, functions and qualities of the natural and historic environments, in order to reduce the risk of flooding, to manage finite natural resources, and to ensure that important wildlife and heritage assets are protected and opportunities are realised to enhance their condition and connectivity. Medway's growth will promote a low carbon economy, seeking to address, mitigate and adapt to climate change. Development will be managed to facilitate the sustainable supply of minerals and management of waste. The area's strategic importance in the energy sector will be secured, and new technologies supported in helping to achieve a low carbon economy.

- 2.35 The Local Plan is an opportunity to establish a positive strategy to guide Medway's development over the next 17 years. Regeneration is at the core of Medway's growth plans and its vision for how the area should look and function by 2035. The council is committed to promoting and realising the opportunities for investing in a renewed urban area with high quality development along the waterfront and in town centres that brings homes, jobs, services and new riverside and city links for Medway's communities. This is reflected in the emerging development strategy for the Local Plan.
- 2.36 The regeneration of Chatham is central to the success of Medway's development. The town centre and adjacent waterfront will be a focus for community life. In line with wider trends seen in retail, the role of the town centre is anticipated to evolve in response to changes in shopping habits, and strengthen as a revitalised hub for community and leisure activities. This will be achieved through investing in quality, extending access, and broadening the offer, particularly in leisure, culture and community activities. Chatham can develop a distinct role in offering city scale facilities, such as arts and music venues that realise some of the key opportunities for Medway's future. It will complement the urban centres across Medway. There is potential to bring more homes into the central area, boosting potential footfall for local services and businesses, and increasing vibrancy. This accords with government ambitions to make the best use of land in accessible locations, with good connections to public transport services. Analysis carried out by the Planning Service has confirmed that central Chatham is a highly accessible location, and that there are opportunities for redevelopment that could strengthen its function. This is identified as an 'opportunity area' in the proposed development strategy presented for consultation.
- 2.37 Medway has a complex urban conurbation made up of five distinct towns with their wider neighbourhoods. The Local Plan will promote opportunities to secure the functions of the individual towns, responding to their specific characteristics, local environment, heritage and offers. Rochester Riverside will provide a quality waterfront location for homes, leisure, jobs and services, complementing, and respecting, the unique historic High Street. The Local Plan will support the regeneration of Strood to capitalise on its stunning location overlooking Rochester Castle and Cathedral, its accessibility to high speed rail and motorway links and the availability of redevelopment sites. Gillingham will consolidate its links with the Universities at Medway and its student populations, as well as the wider community. Particular attention will be given to strengthening the links with new development around Gillingham waterfront. Rainham will retain its attractiveness as a popular place to live, and strengthen its role as a service centre. Opportunity areas for redevelopment have been identified in Chatham, Gillingham and Strood, and the council will actively seek to bring forward appropriate development that can enhance these areas, and contribute positively to the vision and strategic objectives set for Medway's growth.
- 2.38 Medway's growth over the next 17 years will take place across the borough, and some areas will see significant change. The Local Plan will seek to direct growth to the most sustainable locations that have potential to expand, to secure investment in infrastructure and services, and to respect the character of the local environment and

heritage. This will help to deliver development that strengthens, rather than detracts from, Medway. Regeneration of underused brownfield sites will form a core element of the growth strategy. Wider growth will be directed to locations where infrastructure can be delivered to support development, and where impacts on the environment can best be avoided, and opportunities realised to achieve net gains for nature.

- 2.39 A quality environment can help boost the economy. Businesses are attracted to places that present a good image. In order to achieve the economic ambitions set out in our vision for Medway by 2035, there is a need to address the unfair perception of the area as an uninspiring post-industrial urban conglomeration. The Local Plan has a role in challenging these perceptions, establishing Medway as an attractive city, with an excellent public realm supporting a vibrant cultural life; new development designed to help people walk and cycle to local services safely and easily; and the surrounding rural and water landscapes recognised as part of Medway's character and offer.
- 2.40 The natural and historic environment will continue to inform how Medway looks and functions. The council has a custodial duty to conserve and enhance the natural environment, in particular the designated habitats and landscapes of the estuaries, marshes and downs. The wider importance of nature is recognised in the greenspaces and countryside that make up Medway's character, and which are strongly valued by local people. A green infrastructure strategy will inform the Local Plan, to provide confidence that the environment is fundamental to the shape of future development in Medway and how growth is managed. The council also recognises the importance of the area's heritage. It has produced a Heritage Asset Review to identify the scope and significance of this aspect of Medway's character, and is preparing a Heritage Strategy to inform the draft plan. It will provide direction on approaches to growth and local distinctiveness, noting the diverse influences across Medway.
- 2.41 The river and estuary of the Medway have defined the history of its urban and rural areas. They are also central to the vision for Medway's future growth. The waterfront regeneration sites have the potential to provide much needed homes, jobs, community and cultural facilities, and turn around negative perceptions of the area. A riverside path or boardwalk linking the towns and out to the villages in the Medway Valley and the Hoo Peninsula would be a conduit for community and commercial activities, and establish new infrastructure that inspires place-making and how people move around the area. A defined riverside route would be a draw for residents and visitors, linking key heritage sites, stations with town centres, the Universities and work places, supporting healthier lifestyles and cultural activities. It would be a focus for the public realm in shaping the modern waterfront city, associated with vibrant urban life within easy reach of the countryside. This would raise the profile of Medway's links with its countryside and open spaces, and complement the wide network of protected and community green spaces.
- 2.42 Development will deliver investment and open up opportunities for Medway's residents for better homes, jobs and services, and to lead healthier lives.

Strategic Objectives

2.43 The role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment. The objectives for the plan are:

A place that works well

- To boost the performance of the local economy by supporting local businesses to grow and attracting inward investment through the provision of good quality employment land that meets the needs of businesses, and to secure and extend higher value employment opportunities;
- To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses;
- To ensure Medway's recognition as a University city and realise economic and place-making opportunities associated with the learning cluster of higher and further education providers in Medway;
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services;
- To strengthen and develop the transport network providing safe and effective choices for travel, including management of the highways network, enhanced public transport systems, and improved opportunities for walking and cycling, with associated improvements in air quality.

A riverside city connected to its natural surroundings

- To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development.
- To address the challenges of climate change, seeking adaptations and opportunities to promote carbon reduction and mitigation measures, and reduce the risk of flooding;
- To ensure the effective management of natural resources, including water, air and soil, and the sustainable supply of minerals and appropriate management of waste.

Medway recognised for its quality of life

- To reduce inequalities in health by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of local services and dementia friendly environments;
- To provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs;
- To strengthen the role of Medway's town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs, with Chatham providing the focus for new retail and community facilities.

Ambitious in attracting investment and successful in place-making

- To deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics;
- To secure the ongoing benefits of Medway's regeneration, making the best use of brownfield land, and bringing forward the transformation of the waterfront and town centre sites for quality mixed use development, a focus for cultural activities;
- To establish quality design in all new development, respecting the character of the local environment and seeking opportunities to boost quality and improve the accessibility and design of the public realm;
- To ensure that development is supported by the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served.

SECTION 3

DEVELOPMENT STRATEGY

- 3.1 This section considers the scale of development needed to support Medway's growth, and strategies to deliver our ambitions for a leading University waterfront city, noted for its revitalised urban centres and its stunning natural and built environment. It presents alternative approaches to how Medway may achieve the vision and strategic objectives set for sustainable development promoted in the plan.
- 3.2 Four development scenarios are presented for consultation. These largely focus on the distribution of housing land. However there are common approaches to employment and retail land in the development strategy, and there will be requirements for infrastructure delivery in line with housing allocations. The council will consider the comments made during consultation, together with further technical assessment work to prepare a preferred development strategy that will be presented in the draft Local Plan. This will be published for consultation later this year.

Defining Development Needs

- 3.3 When the council started work in preparing a new Local Plan for Medway, it commissioned, jointly with Gravesham Borough Council, a Strategic Housing and Economic Needs Assessment. This work is an intrinsic part of the Local Plan evidence base, and identifies the scale and mix of development needed to support Medway's growth over the plan period.
- 3.4 A Strategic Housing Market Assessment²² was published in 2015 to support consultation on the Issues and Options stage of the new Medway Local Plan. The assessment took account of official data on household projections, together with a broad range of criteria that provide market signals, and employment projections, to determine the scale and mix of housing needed by 2035 by Medway's communities. It also considered the relationship with surrounding areas, with rates of migration and commuting and defined Medway's housing market area. There was explicit consideration of the relationship with London and migration rates. This assessment was based on the 2012 based Household Projections published in 2014. This identified a need for 1281 homes per annum, or 29, 463 over the plan period.
- 3.5 Since the preparation of the Strategic Housing Market Assessment, further 2014 based household projections have been published, as well as annual data on population estimates and migration. Through the annual Authority Monitoring Report, the council collates and analyses a range of demographic, housing and development data.
- 3.6 This information shows some notable variations in population and migration in recent years. The rate of annual growth in Medway's population has slowed in recent years,

²² GVA, 'North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway', December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

from the peaks seen between 2012 and 2014. Rates of growth in 2016 were under 60% of the level seen in 2012. Migration trends have also been very volatile in recent years. There is also some uncertainty on assumptions informing national projections of migration, particularly after the UK exits the European Union. The SHMA methodology used a 10 year average to smooth out short term variations. Further consideration of the demographic information and trends informing Medway's household projections are set out in a Housing Delivery background paper, produced to support the Development Strategy consultation. The council recognises the variations in projections of population and household growth, and will update its evidence base for development needs to take account of the 2016 based household projections due to be published in summer 2018.

- 3.7 In September 2017, the Government published a consultation document 'Planning for the Right Homes in the Right Places'²³, that included a proposed standard method for calculating Local Housing Need. The supporting information identified an annual housing need up to 2026 for each Local Authority in England. In Medway, the rate was for 1665 homes a year, or 37,143 over the plan period. The large increase in defined housing need, above the 2015 SHMA figure of 1281 homes per year, resulted from use of a methodology that reflected an adjustment factor in areas of poor housing affordability. In common with many areas across Kent and the wider South East, this proposed method resulted in a significantly higher housing needs figure for Medway. The council has identified concerns with the methodology and its application, given that Medway is comparatively one of the most affordable areas in the South East.
- 3.8 At the time of preparing the content for this Regulation 18 document, the Government has not yet published its response to the consultation on the Standard Method. However advice²⁴ from Government has confirmed its expectations that local planning authorities use the Standard Method where emerging Local Plans have not yet been submitted for independent Examination before Spring 2018. This is the case for Medway.
- 3.9 The consultation document states that the defined Local Housing Need is a first step for the housing target for a Local Plan. It is recognised that areas may have important constraints, such as environmental designations, Green Belt, or physical constraints that restrict the ability to meet the needs in full. If this is robustly and soundly assessed, the plan may promote a housing target lower than the Local Housing Need figure. However the council will be required to explore other options for meeting its area's housing needs, such as providing more land in a neighbouring borough.
- 3.10 Therefore in preparing for this stage of consultation on Medway's new Local Plan, the council has explicitly considered how it could meet the higher level of housing needs

²³ Department for Communities and Local Government, 'Planning for the right homes in the right places: consultation proposals', 2017, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Homes_Consultation_Document.pdf

²⁴ Ministry of Housing, Communities & Local Government, 'NPPF timetable update', Jan 2018, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/678443/NPPF_Timetable_Update-January_2018.pdf

over the plan period, consistent with the strategic objectives of the plan, and requirements of sustainable development.

- 3.11 Gravesham Borough Council shares a housing market area with Medway. In its representations to consultation on the emerging Medway Local Plan, it has sought flexibility within the Medway plan to meet the wider housing market area's needs, should excess residential land be identified during the plan preparation process. Gravesham Borough Council will be publishing details of its Site Allocations and Development Management Policies document for consultation later in 2018. Medway Council will engage with Gravesham Borough Council on the respective plans through the Duty to Cooperate, and prepare a Statement of Common Ground, to address cross boundary development issues, including the supply of housing land. This will include engagement with other neighbouring local planning authorities within Medway's housing market area.
- 3.12 The council will refresh its evidence base on development needs prior to the publication of the draft Local Plan for consultation. This work will take account of the updated household projections based on 2016 data, and the publication of the government's response to the outcomes of the consultation on the Standard Method. This refreshed evidence will support the draft plan.

Identifying alternative development approaches

- 3.13 The council is seeking to positively prepare a plan to manage Medway's growth, addressing the challenges of meeting housing needs, boosting the economy, protecting the environment and raising standards of health and well-being. Such complex and diverse challenges require a considered and sound strategy to ensure that development benefits, rather than damages our area and communities. Consultation on the 'Development Options' stage of the emerging plan, showed general support for the proposed vision and strategic objectives for the Local Plan. These inform the alternative approaches to development that have emerged from further work on site assessment and sustainability appraisal.
- 3.14 The council has carried out a wide review of potential land for development across Medway, to determine which sites and locations represent the most sustainable and successful choices for the plan's growth strategy. It has followed an iterative process of assessing land availability and suitability within the borough. The council has prepared Strategic Land Availability Assessments²⁵ (SLAAs) to support the production of the Local Plan. These assessments have involved a wide ranging review of land across Medway and engagement with the development sector through the 'Call for Sites' process to identify potential land for development.
- 3.15 The SLAA process has considered a comprehensive range of criteria to determine the suitability of land for sustainable development. The criteria have included environmental issues, transport and accessibility, heritage, physical and infrastructure constraints. The council has used the site assessment information,

²⁵ Medway Council, 'Medway Strategic Land Availability Assessment', Available at: <http://www.medway.gov.uk/planningandbuilding/planningpolicy/strategiclandavailability.aspx>

together with consideration of wider strategic development opportunities to identify locations that would best meet the objectives of the Local Plan and deliver sustainable development. These have been further tested through the Sustainability Appraisal process informing the preparation of the Local Plan. The council mapped walking zones to train stations to define areas of high accessibility. This was used to inform calculations of density approaches on a site by site basis.

Land Supply Pipeline

- 3.16 The council monitors the delivery and planning of development through its annual Authority Monitoring Report²⁶. It has used data collected for the period up to 31 March 2017 to identify a pipeline of land supply for housing over the plan period (2012-2035). This provides:

Development status	Number of dwellings
Homes completed 1 April 2012- 31 March 2017	2822
Residential planning permissions	7299
Total housing identified 'pipeline'	10,121

- 3.17 This 'pipeline' of housing sites forms part of the supply of the housing needed over the plan period.

Making the most effective use of land

- 3.18 Planning policy²⁷ and wider government guidance promotes the effective re-use of previously developed land (provided that it is not of high environmental value). Regeneration of brownfield sites is at the core of Medway's development plan.
- 3.19 Regeneration in Medway over recent decades has brought marked changes and benefits to the area. This has included the establishment of a learning quarter around Chatham Maritime, with the shared Universities at Medway campus, Mid Kent College and the University Technology College. This major investment is critical to addressing the skills gaps still seen in some areas in Medway, and provides the basis for lifting economic productivity.
- 3.20 In transforming from the area's industrial past, Medway has brought forward land for development, promoting opportunities to make best use of derelict or underused previously developed land. In line with national policy, the council supports a development strategy that continues to deliver benefits from regeneration. This forms the core of the Local Plan vision and strategy for growth and directly addresses the strategic objectives of the plan.
- 3.21 Development on urban brownfield sites forms a significant component of the development strategy. The regeneration strategy is set out in 'Medway 2035', which

²⁶ Medway Council, 'Authority Monitoring Report 2016-2017', available at:
<http://www.medway.gov.uk/planningandbuilding/planningpolicy/authoritymonitoringreport.aspx>

²⁷ Department for Communities and Local Government, 'National Planning Policy Framework', Paragraph 17, pg.5, 2015 Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

complements the emerging Local Plan. The development of key waterfront sites forms an important element of plans, with many benefitting from planning permission or development briefs.

- 3.22 The council has identified further opportunities in urban centres for sustainable development. As retail has undergone structural changes in recent decades, the function of town centres in Medway, as elsewhere, has weakened. A key objective of the plan is to strengthen the role of town centres, and opportunities have been identified to diversify the range of uses within central areas. This includes residential, wider commercial and community activities.
- 3.23 Government promotes the efficient use of land in meeting the significant housing challenges that the country faces. Development in areas that benefit from high levels of accessibility to sustainable transport is encouraged. Analysis of access to a range of transport modes in Medway has clearly shown highest levels of accessibility in central urban areas, with relationships to mainline train stations and public transport hubs. Such areas may support higher density approaches to housing, where appropriate to the character and amenity of the surrounding area. An increased resident population in central areas can increase the vitality, economic and social wellbeing of town centres. There are opportunities for further student accommodation in centres, particularly in Chatham and Gillingham, which are located within walking distance to the Universities and colleges. The council seeks to widen the community role of town centres, such as through an enhanced leisure and cultural offer in Chatham. The centres also offer attractive locations for a wide range of businesses, which could benefit from good levels of connectivity. The accessibility analysis²⁸ carried out by the council has confirmed the potential of the central urban areas to accommodate higher density development, where this does not conflict with heritage and amenity.
- 3.24 The council has identified a number of potential sites, and wider opportunity areas, that could form the basis for revitalising town centres, bringing land forward for new homes and jobs, and supporting a strengthened retail core. There are specific opportunities in Strood, Chatham and Gillingham.
- 3.25 The sites making up these opportunity areas have been assessed to determine the potential capacity and mix for new development uses. The council recognises that not all sites are currently available, and has taken a cautious approach in specifying the amount of development to be realised in the opportunity areas during the plan period.

Hoo Peninsula Rural Town

- 3.26 In reviewing the options available to positively preparing a plan for Medway's sustainable growth, the development of a rural town on the Hoo Peninsula was assessed to potentially provide a core component of the strategy. This would complement the urban regeneration dimension, providing for a wider range of development. The rural town could also provide a basis for enhancing the

²⁸ Further information in Housing Delivery background paper at www.medway.gov.uk/futuremedway

sustainability of the peninsula, through a strengthened economic and social offer, and investments in the wider environment.

3.27 This growth option would involve a number of strategic landholdings in and around Hoo St Werburgh, Chattenden and Deangate. A masterplan led approach would be required to deliver:

- a sustainable rural town defined by quality and distinctive development that respects its countryside setting;
- a wide range of homes reflecting the needs of households in Medway, including affordable housing, supported and adapted housing to meet the needs of people with disabilities, and a mix of household sizes and types;
- new employment land diversifying the current offer;
- upgrades to transport to the Hoo Peninsula, and serving and connecting the town;
- new and improved services, including shops, education, schools, parks, allotments, leisure and sports facilities, utilities and water and flood management, to meet a range of community needs, including children and young people, and older people;
- resilient and attractive green infrastructure that respects and defines the rural setting, separation of settlements and relationship to the wider peninsula; and
- mitigations to address air quality through provision of measures to promote modal shift and provide for greater range of services being accessed locally.

3.28 A plan led approach to managing the growth of a rural town is essential to ensure the success of this proposed rural town. The development has the potential to make a significant contribution to housing supply, but this needs to be considered in a wider strategic context. Such a scale of growth is dependent upon significant upgrades in infrastructure, including transport, health, education and wider community facilities. In developing a town, particular aspects need to be strengthened, such as the retail, economic and community roles. The greatest care and attention needs to be given to sensitively planning growth around Hoo St Werburgh to respect the countryside setting and links to the wider estuary. The proposals would involve the creation of two new country parks, opening up access to the countryside, and mitigating the potential for negative impacts on important environmental assets. The Hoo Peninsula has a distinctly different character to urban Medway, and the development approach needs to embed the landscape and wider environmental qualities to achieve a clearly rural character. Development would be required to recognise the importance of environmental designations, given the international and national significance of the Hoo Peninsula's habitats and landscapes.

Sources of supply for windfall calculation

3.29 Many sites in Medway come forward for development as 'windfalls', that is, they have not been previously identified in the Local Plan or other policy documents. This has formed an important element of land supply over the last decade. Based on evidence, the council has identified a conservative estimate of provision from windfall supplies coming forward in the plan. It is anticipated that there will be further certainty on some sites in opportunity areas at the draft plan stage.

- 3.30 The following sources of supply are identified as some of the potential areas that could deliver the windfall allowance:
- Sites coming forward in opportunity areas for redevelopment
 - Residential units above retail and commercial properties
 - Conversion of commercial premises to residential under Prior Approval
 - Renewal and intensification of older residential estates
 - Small sites under 5 units which are not included in the SLAA
- 3.31 All represent significant opportunities and therefore provide a realistic basis from which to consider a land supply of 3332 dwellings from windfall sources over the plan period.
- 3.32 Fuller information on these potential sources of supply are set out in the Housing Delivery background paper produced for the Development Strategy consultation.

Distribution of Development

- 3.33 The sites and broad locations that have emerged from technical assessments as the most sustainable locations provide a diverse offer that can meet the wide range of housing needs. The strategic allocations, such as land around Hoo St Werburgh, provide the greatest opportunities to secure investment in critical upgrades to infrastructure. Consultation on earlier stages of plan preparation has shown that many local people and groups are concerned about the impact that growth and the associated development could have on Medway, particularly on infrastructure and services. There are a mix of brownfield and greenfield sites, and a broad variety of site sizes. The proposed allocations include a number of small and medium sites that are often quicker to deliver and attract smaller housebuilders. This accords with government policy to increase participation in the housebuilding market. Detailed assessments have been carried out to determine phasing and therefore delivery rates over the plan period.

Scenario 1: Meeting Objectively Assessed Need

- 3.34 The council is seeking to meet its housing needs within the borough boundary. The 2015 North Kent Strategic Housing and Economic Needs Assessment identified an objectively assessed need for housing of 29,463 homes over the plan period. This figure is used as the basis for this development scenario.
- 3.35 The strategy seeks to firstly direct growth to brownfield urban sites, to realise the potential of regeneration. This includes identified waterfront regeneration sites, together with 'opportunity areas' in and around town centres with the potential for redevelopment. Not all of the land in the 'opportunity areas' is currently available, and therefore these sites have not been included in the identified land supply. However there is potential for such sites to contribute to the 'windfall' land supply.
- 3.36 This approach complements urban regeneration with the proposed development of a rural town and some suburban expansion. Over half of growth is directed to urban sites, and the rural town, plus some village expansions could provide about a third of housing land. Development of the rural town in this scenario does not involve

development of land on the designated SSSI at Lodge Hill and Deangate, and includes buffers to protected land.

- 3.37 Around 10% would potentially be allocated to suburban areas. Some growth is directed to suburban areas, such as parts of Capstone Valley and north of Rainham. The release of land in the wider suburban areas is restricted due to concerns about the ability to mitigate transport and environmental impacts. It is not considered that the 'exceptional circumstances' exist to justify the review of the Green Belt boundary to accommodate development. A small 'buffer' above the defined housing need figure is shown, to allow for flexibility in the strategy

Component of Land Supply	Number of dwellings
Pipeline sites (completions and permissions)	10,121
Potential allocation capacity on identified sites	16,497
Windfall allowance (17 years)	3,332
<i>Total</i>	<i>29,950</i>
SHENA Objectively Assessed Housing Need	29,463
'Buffer'	487

Scenario 2: Investment in Infrastructure to unlock growth

- 3.38 Work in assessing development potential across Medway has identified that land on the Hoo Peninsula could form an important part of the area's growth strategy. A rural town centred on Hoo St Werburgh is included in all of the development scenarios set out in this consultation document. As outlined in Scenario 1, this proposed rural town could deliver new and improved services and infrastructure, providing for its residents and the wider Hoo peninsula.
- 3.39 The scale and scope of potential growth requires significant investments in infrastructure to increase the capacity of transport networks, utilities and wider services to meet the needs of the area's growing population. The timely and effective delivery of infrastructure is critical to achieving the sustainable development of the rural town. Developers will be required to contribute to the funding of key infrastructure. The planning and phasing of delivery of the proposed strategic development allocation is informed by critical stages of infrastructure upgrades.
- 3.40 Delays in securing the funding needed for strategic infrastructure will impact on the timing and scale of development that can be delivered. The council is bidding for additional funding to invest in the improvements needed to strategic infrastructure to support growth over the plan period. Transport forms the core of the strategic infrastructure investment proposals. The council is engaging positively with transport service providers and planning bodies on these proposals.
- 3.41 The limited access to the Hoo Peninsula, and particularly the junction of the A228 and A289 at Four Elms Roundabout, presents a constraint to growth. The network currently experiences congestion in this location, which has contributed to the designation of an Air Quality Management Area. Transport assessments carried out in preparation of the Local Plan have confirmed severe impacts on the highways network arising from potential growth, if mitigations are not in place.

- 3.42 Transport solutions for sustainable growth require broadening the choices of how people travel. Public transport on the rural Hoo Peninsula is limited and there are higher rates of car usage than seen in the urban parts of Medway. The strategy looks to upgrade the capacity of the highways network, through new connections and design at Four Elms and road widening of the A228. It also seeks to bring about a step change in the public transport offer serving the Hoo Peninsula. This includes the potential use of the Grain freight line for passenger traffic, that could connect to the north Kent High Speed service via Gravesend. Investment would also upgrade the bus network, using dedicated bus lanes to provide fast, frequent and reliable links to key destinations. The policy approach to the proposed rural town promotes healthy travel, with walking and cycling routes central to the design.
- 3.43 The introduction of a passenger rail service to the Hoo Peninsula presents a unique opportunity for the area. It is a major component of a sustainable growth plan, and can raise values, that secure the viability and delivery of development. It is an economic driver, and can boost the attractiveness of the area as a desired business location. It also supports a different approach to design, with opportunities to develop at higher densities in specific locations that are well connected to a transport hub, such as a new station.
- 3.44 This scenario follows the development strategy set out at Scenario 1, but explicitly considers the implications and approach to masterplanning and design that could arise from the introduction of a new passenger rail service and stations. This results in bringing forward development at a faster rate on the Hoo Peninsula, and achieving greater capacity on some sites that are appropriate for higher densities in accessible locations. However, the rural character of the Hoo Peninsula would not support the densities found in more urban areas.
- 3.45 The higher and faster rates of delivery that could be supported in this scenario would reduce the need to release some sites in suburban areas, where there are more limited opportunities to mitigate transport impacts. This could remove land in the Capstone Valley and to the north of Rainham from proposed development allocations.

Component of Land Supply	Number of dwellings
Pipeline sites (completions and permissions)	10,121
Potential allocation capacity on identified sites	17,580
Windfall allowance (17 years)	3332
<i>Total</i>	<i>31,033</i>
SHENA Objectively Assessed Housing Need	29,463
'Buffer'	1,570

Scenario 3: Meeting Government's proposed calculation of Local Housing Need

- 3.46 This scenario responds to the definition of local housing need by the government's proposed standard method, as outlined at paragraph 3.7 above. The annual housing need of 1665 homes has been projected from 2016 to the end of the plan period in 2035, which calculates a need for 37,143 homes.

- 3.47 The council has considered how it could plan to deliver this scale of growth over the plan period. This level of housing need is incredibly challenging, and would require a radical change in how development is delivered. In assessing the options to deliver this level of growth, issues of infrastructure and environmental capacity were identified.
- 3.48 The vision and strategic objectives for Medway's growth are based on ambitions for sustainable development. These inform a strategy that seeks to realise the further opportunities of regeneration, and direct development to sustainable locations in the wider borough, that respect the environment and can be supported by infrastructure.
- 3.49 A major objective of the Local Plan is to strengthen the local economy, lifting rates of productivity, providing the basis for more quality jobs. The Strategic Housing and Employment Needs Assessment considered the relationship between housing and employment, to define appropriate levels of land supply, to ensure balanced and sustainable development. The 'Standard Method' solely considers housing need, and guidance has not yet been provided on the relationship to employment land needs. The council recognises the risk of loss of commercial land to residential uses in seeking to significantly boost the supply of housing to levels identified by the government's methodology. This could exacerbate rates of out commuting and unsustainable development, if jobs growth does not keep pace with the rising housing supply.
- 3.50 The key components to increasing the supply of housing in this scenario would require a reliance on the development of the urban opportunity areas and achieving high densities on appropriate sites. This could lead to difficulties in achieving the mix and range of housing types needed by Medway's communities. Land in the Capstone Valley and to north and east of Rainham would be considered as potential allocations for development in this scenario. Some employment land is also identified for possible redevelopment to meet housing needs.
- 3.51 There is considerable uncertainty on the ability to demonstrate the deliverability of such rates of growth, together with the infrastructure requirements. The impacts on the transport network would be particularly challenging to mitigate, and exacerbate the problems of poor air quality in the designated Air Quality Management Areas.

Component of Land Supply	Number of dwellings
Pipeline sites (completions and permissions)	10,121
Potential allocation capacity on identified sites	22,508
Windfall allowance (17 years)	3,332
<i>Total</i>	<i>35,961</i>
Standard Method Local Housing Need	37,143
'Shortfall'	-1,182

Scenario 4: Consideration of development within Lodge Hill SSSI

- 3.52 Previous stages of consultation on the emerging Medway Local Plan made reference to the possible use of land at Lodge Hill for a new settlement on the Hoo Peninsula. This involved development of former military land designated as a Site of Special Scientific Interest. The potential inclusion of the site as part of Medway's development strategy was subject to the outcome of a Public Inquiry into an outline planning application for the proposed development of a strategic mixed use site, providing for up to 5,000 homes.
- 3.53 In September 2017, the outline planning application for proposed development at Lodge Hill was withdrawn and the Public Inquiry cancelled. Land at Lodge Hill has transferred from the military ownership of the Defence Infrastructure Organisation to the national regeneration agency, Homes England. Homes England has carried out new survey and evaluation work to provide a detailed understanding of the site. It is using this information to assess the impact of potential development on the environmental interests of the site. The agency is preparing a new development proposal for land at Lodge Hill, based on this analysis of the site. The new proposal is significantly reduced in scale from the withdrawn outline planning application, reflecting a new strategy for nature conservation on the site. However the scheme does involve elements of development on land designated as a SSSI.
- 3.54 Homes England is seeking to achieve a new approach that secures the environmental interests of the site in perpetuity, addresses concerns of site safety resulting from unexploded ordnance and is underpinned by resources realised through development values in other parts of the site. In considering new proposals for the site, Homes England is working with Natural England in compiling its evidence base and assessing its emerging approach to the management and development of land at Lodge Hill.
- 3.55 Ecological survey work has informed a new proposal for the site that directs development to the western and southern areas, around Chattenden Barracks and Lodge Hill Camp. All of the ancient woodland and land to the north-east of the site would remain undeveloped to be managed for the long term environmental interests.
- 3.56 The emerging proposal seeks to deliver a residential led scheme for up to 2,000 homes, as part of a wider strategic development of the wider Hoo rural town. It would also include land for a primary school, over 29 hectares of public open space, some mixed use facilities, for community uses, small retail units and commercial land. The proposal focuses on two areas – expanding the existing Chattenden village, and a new village at Lodge Hill Camp. Development at an expanded Chattenden would seek to sensitively integrate with the current village, as well as possible development that may come forward on adjacent land as part of a strategic growth allocation. The current village of Chattenden has a limited range of services and new development would be required to address these shortcomings as part of a balanced and sustainable approach to an expanded village.

Homes England – Lodge Hill scheme proposed development mix
Overall land ownership – 365 ha
Net development area – 47.8 ha
Number of Homes – up to 2,000 dwellings
1 primary school (2 form entry)
Local centre, including business and retail
Public open space – 29.6 ha
Non developable area (including nature conservation areas) – 228.22 ha

- 3.57 Homes England has outlined an initial nature conservation strategy based on the ecology surveys and assessments carried out in and around Lodge Hill. The strategy consists of both on-site and off-site measures, with land management for conservation interests, sensitive clearance of unexploded ordnance to secure site safety, and establishment of compensatory habitat for nightingale habitat to address negative impacts addressing from potential development. The nature conservation strategy informs both the location of potential development land and its phasing.
- 3.58 National policy provides the highest level of protection from development that would result in significant harm to land designated as a SSSI. The NPPF directs local planning authorities to seek to avoid development likely to have an adverse effect on a SSSI, with the only exception being that the benefits of the development clearly outweigh the impacts on the features of the site, and any broader impacts on the network of SSSIs. Only where development can not be avoided, should mitigation and compensation measures be considered.
- 3.59 The council has included this potential scenario that involves development on land designated as a SSSI so that a transparent and objective assessment of the impacts arising from potential development can be made as part of the consultation process that informs the new Medway Local Plan.
- 3.60 If the proposed scheme for development at Chattenden village and Lodge Hill Camp, as outlined in plan 5 (attached) is determined to be sustainable development, this would contribute to the supply of development land in the plan period. In meeting the 'Objectively Assessed Need' for housing, development at Lodge Hill could replace the need to release land at Lower Stoke and south of Shawstead Road in the Capstone Valley.
- 3.61 With the exception of the sites mentioned above, and the extended potential development area at Lodge Hill, all other components of land supply in this scenario are the same as outlined in Scenario 1.

Component of Land Supply	Number of dwellings
Pipeline sites (completions and permissions)	10,121
Potential allocation capacity on identified sites	17,116
Windfall allowance (17 years)	3,332
<i>Total</i>	<i>30,569</i>
SHENA Objectively Assessed Housing Need	29,463
'Buffer'	1,106

Policy DS1: Sustainable Development

The purpose of planning is to achieve sustainable development. When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Planning applications that are in conformity with the Medway Local Plan (and where applicable, with policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date, the council will grant permission, unless material considerations indicate otherwise, and considering whether:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in the NPPF indicate that development should be restricted.

Policy DS2: Spatial Development Strategy

The council will seek to meet the development needs for homes, employment and retail land, infrastructure and services, as determined by the evidence base set out in the Medway Local Plan, whilst respecting the need to conserve and enhance the natural and built environment.

The development strategy for Medway prioritises regeneration, making the best use of underused and previously developed land and directing investment to urban waterfront and centre opportunity areas. The council will encourage sustainable development in appropriate urban regeneration sites to deliver housing, employment, retail and community uses, establishing a quality and accessible public realm, including the extension of a riverside walk. Chatham will provide the focus for new retail and community facilities. Appropriate opportunities to capitalise upon the learning quarter at Chatham Maritime will be positively considered.

Outside of the regeneration areas, the council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting and supported by significant infrastructure investments. The development will be in accordance with a masterplan, to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to a range of services and infrastructure.

The council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.

Strategic green infrastructure zones throughout urban and rural Medway will promote a natural capital approach, and secure benefits for nature and people and provide separation of settlements.

Question DS1:

Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

HOUSING

- 4.1 A core task of the new Local Plan is to provide for the housing needs of Medway's communities over the plan period. As demand for housing has increased across the country, costs have risen and many people from different sectors of society have difficulties in finding a suitable place to live. Although house prices in Medway are lower than neighbouring boroughs, and some of the most affordable in the south east, they have been rising in recent years, placing many properties beyond the reach of local people. The private rented sector doubled in Medway between 2001 and 2011, partly linked to the growing student population, but also reflecting demand from people unable to access home ownership. This wider trend is seen nationally, and there has been an expansion of the 'build to rent' sector. As Medway's population grows and ages, there is a need to ensure the right mix of housing is available for local people.
- 4.2 The Government has put increasing the supply of housing at the centre of its ambitions for the country. The NPPF places a strong direction on local planning authorities to significantly boost the supply of housing. The Housing White Paper and its associated legislation and programmes places housing growth at the forefront of the government's priorities.

Housing Need

- 4.3 In preparing the new Local Plan for Medway, the council commissioned a Strategic Housing and Economic Needs Assessment to provide evidence on the housing needed in Medway over the plan period. This was carried out in line with Government requirements to identify the objectively assessed need for housing as a core component of the Local Plan process. Using Government guidance, the assessment analysed demographic, economic and market signal information to determine the quantity and types of housing needs. The technical assessment concluded that the Local Plan needs to provide for 29,463 new homes over the plan period. Since this assessment was carried out the government has published details of its proposed standard method for calculating local housing need. This has been considered in section 3 of this report. Further detail is provided in the Housing Delivery background paper supporting this consultation. The council notes the significantly increased housing needs figure that is generated by use of the government's proposed approach. The council will have regard to the government's response to the consultation, updates to the NPPF, and the publication of 2016 based household projections, to review its evidence base on development needs, before publishing the draft Local Plan.
- 4.4 The Strategic Housing Market Assessment considered the range, type and mix housing needed in Medway. This included the need for 'affordable housing', the size and mix of homes, and those with particular needs, such as older people, people with disabilities, younger person households, minority ethnic groups, and rural

households. The assessment identified a high level of demand for affordable housing at 17,112 over the plan period. The council has identified potential options for development locations to meet the housing needs identified for Medway over the plan period. The scale of projected housing need requires consideration of locations that could accommodate development on a large scale. This is reflected in the potential strategic allocations identified in the development strategy options in this consultation. In particular the proposal for a small rural town on the Hoo Peninsula would provide for a wide range and mix of housing types, that could provide homes suitable for different groups in society. Infrastructure, services, green spaces, shops and employment areas would also be planned as part of new residential areas to provide balanced growth.

- 4.5 The purpose of this Development Strategy consultation is to assess the most sustainable approach to meeting Medway's growth needs. Information gathered through the consultation and technical assessments supporting plan preparation will direct the council to identifying the most appropriate sites and broad locations for growth. Preferred sites will be presented in the draft Local Plan when it is published for further consultation.

Policy H1: Housing Delivery

The council will determine a housing target for the Medway Local Plan, responding to the latest relevant information, in preparing its draft Local Plan.

The council will seek to provide a supply of land to meet the needs for market and affordable housing that responds to the objectively assessed need for housing, and meets the principles of sustainable development.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.

Development of a strategic allocation for a rural town on the Hoo Peninsula will be in accordance with the council's development framework for Hoo.

Question H1:

Does the proposed policy for housing delivery represent a sound approach? Would you suggest an alternative approach?

Housing Mix

- 4.6 The National Planning Policy Framework requires local planning authorities to make provision for a wide choice of high quality homes in mixed, sustainable communities. A key element of this is matching supply of accommodation to need, striking the right balance for a diverse population with changing needs over time. Medway's

communities require a variety of housing, including choice of tenure, to provide appropriate housing options for different households including families with children, couples, single person households and older people. Information has also been assessed for people with disabilities, students, and gypsy, traveller and travelling showpeople.

4.7 Findings of the Housing Need Survey under the Strategic Housing Needs Assessment 2015 revealed that:

- Respondents' properties being too small was the most common reason for those describing their accommodation as not meeting their needs.
- Two thirds of those who wanted to move stated that a two bedroom property was their preferred choice
- Over half of emerging households stated that a two bed property would suit their needs.

The council's Homechoice service records demand for social housing units locally. This confirms a preference for one or two bed properties and that for those looking for larger accommodation; the biggest demand is for one extra bedroom.

4.8 A variety of housing types and sizes, including plots for self-build, will be required to assist in achieving balanced and sustainable communities. However the council recognises that not all sites will be able to accommodate the full range of types needed. The Council will therefore take into account the nature and location of the scheme and, in particular, whether there are any genuine reasons why a mix of types cannot be delivered in practice, or would be harmful to the setting of a heritage asset for example.

Household type and size

4.9 Analysis of the 2014-based household projections indicates that Medway is predicted to see a notable increase in single person and small family households. Single, older male households increase by one quarter, and households with one child will increase by one fifth by 2035. Overall Medway has an above average household size at 2.44 persons compared to 2.36 nationally, however this is predicted to fall to 2.33 in 2035 (2.22 nationally). Changes in household sizes have been taken into account in calculating the scale of housing needed over the plan period. It is noted that Welfare Reform could increase the number of people under 35 years looking to rent a room rather than a self-contained home, due to changes in eligibility for support of housing costs. Wider legislative changes in housing and social policies may also have impacts on the local housing market.

Policy H2: Housing Mix

The council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population.

Residential development will be permitted to encourage a sustainable mix of market housing to include an appropriate range of house types and size to address local requirements.

The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

Accommodation requirements as detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform which house sizes and mix should be delivered in urban and rural areas to meet the objectively assessed needs of the area.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council's housing register and discuss affordable housing requirements with the council's Housing Strategy team at the pre-submission stage of the planning process.

Large development schemes meeting the criteria set out at Policy H9, must demonstrate that sufficient consideration has been given to custom and self-build plots as part of housing mix.

The council will work with partners to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people.

Gypsy, Traveller and Travelling Showpeople accommodation requirements will form part of the borough's need for housing

Question H2:

Does the proposed policy for housing mix represent a sound approach? Would you suggest an alternative approach?

Affordable Housing

4.10 The costs of housing have been rising steadily in recent years, and are now unaffordable for many people. Income levels in Medway are lower than the average in neighbouring areas, and this adds to the difficulties experienced by many residents in accessing housing, either for rent or purchase. In planning for housing to meet the full needs of the local area, the council needs to make appropriate provision in its housing policies. Government policy requires local planning authorities to meet their housing needs in full, both for affordable and market housing.²⁹ This should be delivered on site unless justified otherwise.³⁰

4.11 As noted above, the Strategic Housing and Economic Needs Assessment identified a need for 17,112 affordable dwellings over the plan period. However the Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial

²⁹ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 47, p.12, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

³⁰ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 50, p.13, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

analysis indicates a percentage of 25% affordable housing could be achieved on developments over 15 units. Some areas could support a higher proportion of affordable housing. The assessment indicated an affordability level of 30% for rural areas and 25% for urban areas. Rural areas are much stronger in terms of viability in Medway and so could provide for a higher level of affordable housing. Further work is required to test the viability of the Local Plan and policies, informed by and further policy direction on Starter Homes, and an understanding of the locations, scale and mix of development that will be identified as housing allocations in the new plan.

- 4.12 In preparing the Local Plan, and determining the location and scale of housing allocations, the council will consider and test the delivery of affordable housing, and make appropriate provision in the housing policies to deliver affordable housing that meets the locational requirements (particularly in rural areas), size, type and tenure required by local people, as identified in the SHENA, the council's Housing Strategy or subsequent updates to the evidence base.
- 4.13 The council currently seeks a tenure mix of 60% affordable rent and 40% intermediate affordable housing (of which shared ownership is the preferred option) on development schemes where the number of affordable units to be provided is greater than 10. The council's Housing service has identified a greater demand for affordable rent properties and a review of the split will inform the Affordable Housing policy in the draft Local Plan.

Policy H3: Affordable Housing

On housing and mixed use development sites of 15 or more residential units the council will require the delivery of affordable housing.

The council will apply the following requirements for affordable housing provision:

- in rural Medway 30% of all residential units for developments of 15 or more dwellings
- in urban Medway 25% of all residential units for developments of 15 or more dwellings

Provision must be in accordance with the council's Guide to Developer Contributions and Obligations.

There will be a strong presumption in favour of the affordable homes being fully integrated within the proposed development. However the council may consider off site provision, where this enables other policy objectives to be met, subject to an equivalent level of developer contribution being provided.

Where affordable housing is to be provided offsite, the council's preferred position is for developers to directly providing affordable dwellings on an alternative sit. Only where it can be demonstrated that this can not be provided, would the council consider a financial contribution from the developer which would enable provision through new build on an alternative site.

Question H3:

Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision? What do you consider would represent an effective alternative approach?

Question H4:

What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

Starter Homes

- 4.14 The Government has identified that many people struggle to get access to home ownership and has promoted 'Starter Homes', provided at a 20% discount from market prices, to support access to the housing market for people under 40 years.
- 4.15 However this policy area has not been progressed by government. The council will consider the updated policy or guidance if provided, and make provision as appropriate in its housing policies and allocations in the Local Plan.

Specialist residential accommodation

- 4.16 This considers the need for housing specially designed for sectors of the community, such as older people, people with disabilities, and vulnerable people with specific housing needs, who may, for a variety of reasons, face barriers in finding accommodation to meet their personal needs. This may involve the need for supported housing. This is accommodation which is provided with integral support as a condition of occupancy. The council has identified a number of groups in need of accommodation, who may seek supported housing: young people at risk of, or who are homeless; young people leaving care; people with learning disabilities; those with clinical mental ill-health issues; people with added vulnerabilities who are or become homeless and people experiencing domestic abuse.

Older People

- 4.17 While Medway's population is predicted to increase by a fifth over the next twenty years, growth in the older cohorts of the population is most significant. Growth in the over 65's accounts for just over half of the overall population growth in Medway with an extra 31,000 older residents by 2035.
- 4.18 The 2014-based household projections show a significant increase in single person households in the older age groups, representing more than half the overall increase in single households in Medway. Males aged 65-74 show the most significant increase over the next twenty years. Statistics show that the demand for supported accommodation is likely to rise, as the older population grows and the number of residents with limiting health conditions increases. By 2035, it is predicted that the number of people aged over 65 years experiencing limitations on their daily activities will increase by 59%.

- 4.19 Medway's vision for Adult Social Care is to support the people of Medway to live full, active lives and to live independently for as long as possible. This includes elderly people and disabled people, and planning for people living with dementia. One of the strategic aims of the Medway housing strategy is to 'improve flexibility of accommodation'. The council is working with partners towards solutions to allow the elderly and residents with physical disabilities to live independently in their own homes with adaptations to suit their individual needs.
- 4.20 Official statistics show that there is a significant need for adapted social rent accommodation with around 41% of tenants reporting a need for disability related housing design adaptations. This is higher than the Local Authority average across England at around 30% of tenants (DCLG (CORE) Social Housing letting statistics, 2015/16).
- 4.21 The Government's Lifetime Neighbourhoods Initiative identified the following findings of official research into older person's preferences for accommodation choices:
- 'The majority of people would prefer to remain in their own homes as they grow older, and where possible can make changes and adaptations to their properties should their needs change. Also those people who chose to move to housing schemes especially for older people that offer care and support in their own homes express high levels of satisfaction with their homes'.*
- 4.22 Evidence from the Projecting Older People Population Information (POPPI) website illustrates that an ageing population is likely to lead to an increase in demand for both housing and schemes that offer an element of care. Over the next 17 years the number of over 65's unable to manage at least one self care activity or at least one domestic task on their own is likely to increase by just over 63%.
- 4.23 Traditionally, specialist accommodation for older people has consisted of sheltered accommodation, residential homes and nursing homes. 'Extra Care Housing' provides for a more flexible form of care for older people, which allows for a greater degree of independence and a lower likelihood of need for more intensive forms of support. Research has shown that the incorporation of certain design features in housing can have positive implications for the health and well-being of older people. In 2009, the Housing our Ageing Population: Panel for Innovation (HAPPI) published a report³¹ examining the design of housing for older people and made recommendations to improve it. This guidance includes 10 key design principles, known as the 'HAPPI principles'; and are considered best practice that should be adopted.
- 4.24 The Medway Extra Care Housing Needs Analysis 2011³² concluded that *'there is clear scope to widen the range of housing and support options available to older*

³¹ Homes and Communities Agency, 'Housing our Ageing Population: Panel for Innovation (HAPPI)', Dec 2009, Available at: <https://www.gov.uk/government/publications/housing-our-ageing-population-panel-for-innovation>

³² Institute of Public Care, 'Extra Care Housing Needs Analysis 2011', Available at: <https://www.medway.gov.uk/pdf/Medway%20extra%20care%20needs%20analysis%20-%20July%202011.pdf>

people across tenures with the need for specialist housing services to enable the growing number of older people to live independently’.

- 4.25 The Medway Strategic Housing Needs assessment indicated ‘a need for good quality, smaller units to encourage downsizing’, while the housing needs survey underpinning this suggests that few residents stated a specific ‘need of supported or extra care housing, although this may be a more hidden need’³³.
- 4.26 Remaining within one’s home with adaptations was the most popular option for older people when asked about care needs over the next five years. This was in preference to sheltered accommodation, extra care housing and residential care homes³⁴. However many live in potentially unsuitable accommodation. The findings of the Housing Need Survey under the Strategic Housing Needs Assessment 2015, revealed that the vast majority of households in the sample that contained an older resident had not had any special adaptations (88%) – indicating a possible unmet housing need.

People with disabilities

- 4.27 The 2011 Census identified 43,400 people in Medway who considered that their day to day activities were limited a little or a lot by a disability or limiting long term illness.
- 4.28 Around 10% of Medway’s population aged between 18 and 64 years have a moderate or serious physical disability.
- 4.29 The Projecting Adult Need and Service Information website (PANSI) estimates that in Medway in 2017 there are around 17,300 people aged 18-64 with a moderate or severe physical disability. This number is projected to rise to 18,900 by 2035.
- 4.30 The total number of residents aged 18-64 predicted to have a serious physical disability in Medway in 2015 is 3,900, projected to rise to 4,300 (+9%) in 2035.
- 4.31 PANSI data estimates that there are 4,300 adults (aged 18-64) with learning disabilities in 2017 in Medway, projection data estimates that this number will rise to 4,700 (+9%) in 2035.
- 4.32 Findings of the Housing Needs Survey under the Strategic Housing Market Assessment 2015 showed that:
- Around 20% of respondents were in a household where a family member had a limiting physical disability, of which ninety-three percent had no special adaptations made to their property, indicating a potential unmet need.
 - Varying level of care requirement were reported, however the need for help with physical tasks was the most reported issue.

³³ GVA, North Kent Shena, ‘Integrated Growth Needs Assessment report’, SHENA, 2015, Available at: <http://www.medway.gov.uk/PDF/App%202%20-%20Medway%20IGNA%20Technical%20Paper.pdf>

³⁴ Housing Needs Survey, SHENA, 2015

- The proportion of households containing one or more members affected by disability suggests implications for housing needs, particularly in relation to adaptations and improvements / facilitating in-home care.

4.33 Specialist housing should be designed flexibly so that it can be adapted to meet alternative housing needs in response to changes in the future. This type of housing should be provided across Medway, rather than concentrated in a particular area. This will help broaden choice and allow people to retain links with their local area, and maintain balanced communities.

Policy H4: Supported Housing, Nursing Homes and Older Persons Accommodation

The development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:

- Meets a proven need for that particular type of accommodation.
- Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs.
- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.
- Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.

Loss of specialist housing will be permitted only where it is demonstrated that there is no need for the form of accommodation.

Question H5:

Do you agree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?

Question H6:

Do you consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs?

Question H7:

Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme?

Student accommodation

4.34 Medway's student population has continued to grow across the further and higher education sectors, largely clustered in the Learning Quarter at Chatham Maritime.

The council needs to take account of the needs of students as a sector of Medway's communities. Positive planning for students can contribute to Medway's regeneration objectives and boost the vibrancy and vitality of town centres, and secure benefits for the growth of the local economy. However it is important to ensure that the expansion of the sector does not adversely affect established neighbourhoods by an over concentration of students and that existing privately rented accommodation is not 'lost' to tenants with otherwise limited housing options.

- 4.35 In 2014 there were estimated to be around 1,200 bed spaces in institutional accommodation in Medway between University of Greenwich, Canterbury Christchurch, University of Kent and the University of Creative Arts. Since then a further 530 student rooms have been provided at Liberty Quays, with plans for further student accommodation provision in the pipeline.
- 4.36 The highest concentration of students are seen in Gillingham North and River wards, at approximately fifteen percent of the resident population, as these areas are within close proximity to the learning institutions. Unlike some traditional student cities, evidence points to a 'not insignificant' section of students remaining living at home while studying in Medway, some commuting in from London, for example, as well as students at the Canterbury campuses being bused in from Medway, due to accommodation shortages there.
- 4.37 Students represent approximately six percent of the Medway population, however student households represent less than three percent of the private rented stock in Medway, suggesting that purpose built student accommodation may be sufficiently serving the current local student demand. Growth in student numbers does not easily translate into a direct accommodation need for the reasons mentioned above. Evidence shows that private rental sector accommodation in Medway does not meet the housing requirements of students³⁵, however the newly created, purpose built student developments should address these shortcomings.
- 4.38 In developing policy for student housing, the council seeks to ensure a sufficient supply of accommodation to meet needs and support the success of the universities and colleges in Medway. A careful approach is encouraged, striking a balance between proximity of students to their places of study, and avoiding over concentration where this could impact negatively on amenity or access to family housing. Opportunities to increase the supply of student accommodation as part of redevelopment schemes in town centres, particularly Gillingham and Chatham, are welcomed.

Policy H5: Student Accommodation

The council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.

³⁵ Opinion Research Services, 'Understanding the Housing Requirements of Students in Medway', ORS, 2014, Available at: <http://www.medway.gov.uk/pdf/SHMA%20-%20Understanding%20the%20Housing%20Requirements%20of%20Students.pdf>

Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need. The council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, and does not have a negative impact on the core functions of the town centres, and is consistent with strategic redevelopment plans.

These locations must be well served by public transport and accessible to a wide range of town centre, leisure and community uses.

Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land or leisure or community space.

Student housing will be required to provide a high quality living environment and include a range of unit sizes and layouts with and without shared facilities to meet requirements of the educational institutions they serve.

Question H8:

Do you agree with the proposed policy for student accommodation? Would you propose an alternative approach?

Park homes and residential caravan parks

- 4.38 Mobile or park homes make up just under one percent (2011 Census) of the overall housing stock in Medway, which is in line with the Kent level but is around double the national rate.
- 4.39 The majority of occupied caravan/mobile homes in Medway are in the two main residential park home estates in the Hoo Marina Park and the Kingsmead park at Allhallows.
- 4.40 Mobile homes are an attractive housing option for a number of households in Medway. Some cater for specific market sectors, such as people over 50 years. For that reason the council supports the retention of mobile homes in these parks to assist in the supply of a mix of accommodation.
- 4.41 This policy does not consider free standing individual mobile homes or caravans, such as provided for specialist workers in the land based sectors, or where providing a form of temporary accommodation, such as during the construction of a new or replacement dwelling. Further policy will be provided as part of the development management section of the draft Local Plan.

Policy H6: Mobile Home Parks

Proposals for mobile or park home developments will be given the same consideration as other dwellings and will be subject to the same compliance with planning policy in assessing impact and sustainability.

The council seeks to protect existing parks from competing uses, but restrict their expansion outside designated areas. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area particularly those near areas of sensitive environmental interests.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home park, or a reduction in the area available for their use will not be permitted.

The council will set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

Any proposals for updates or intensification must have careful consideration for the colour, massing and materials used, incorporate appropriate landscaping and have no adverse impact on the character of the locality or amenity of nearby residents.

Question H9:

Do you agree with the proposed policy for mobile home parks? Would you propose an alternative approach?

Houseboats

4.42 There are approximately 250 houseboats in Medway and around 400 moorings, many of which are located at sites near Hoo Marina and south of Rochester. Regeneration plans for waterfront development could impact on some sites. However redevelopment plans could lead to improvements to the local environment around the areas where houseboats are located, leading to better access to key services in conjunction with better clustering of houseboats on the River Medway.

4.43 Many of the houseboats in Medway have limited facilities, including for waste disposal and can have negative environmental impacts. In some cases, houseboats are poorly maintained, which can negatively impact on the surrounding amenity. Medway's river and estuary are designated for their environmental importance. Opportunities to upgrade facilities and amenities will be supported where there will be no adverse environmental impacts. Particular regard needs to be given to the health of the designated marine and supporting habitats of the estuaries and river.

Policy H7: Houseboats

The council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim:

- To protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place.

- To specify criteria under which any further growth of houseboats will be allowed in order to minimise impact.
- To seek the removal and disposal of any vessel so moored if a boat sinks, or becomes unfit for habitation, derelict, or is otherwise abandoned.
- To seek opportunities to deliver improvements that benefit the local amenity and environment.

Question H10:

Do you agree with the proposed policy for houseboats? Would you propose an alternative approach?

Houses of multiple occupation

- 4.44 A house in multiple occupation (HMO) is a property that is shared by three or more tenants who are not living together as a family, and who share basic amenities such as a kitchen, bathroom or toilet facilities, but have separate bedrooms. HMOs can provide affordable housing for single people. With increasing demand on the housing market locally, demand for this form of accommodation is likely to increase. Returns on housing statistics³⁶ recorded 300 HMOs in Medway in 2016/17, but other sources indicate levels are likely to be higher. The type and condition of this housing stock varies considerably across Medway, with areas such as Gillingham South having the highest number of shared or converted flats.
- 4.45 Evidence shows that areas with particularly high concentrations of HMO's can potentially lower the standards of amenity experienced by local residents, due to poor management of properties, disturbance and poor provision or use of waste storage facilities. A combination of issues can lead to an area attracting a high proportion of young, single people which may be linked to short-term tenancies and a relatively high turnover of residents. This can conflict with the amenity of more settled residents within the same neighbourhood. Standards of facilities in HMOs can vary and where of poor quality can present unhealthy living conditions for residents. The council recognises the role of HMOs in providing choice in the housing market, but seeks to avoid unacceptable adverse impacts on amenity, or loss of family accommodation through managing the new development of new HMOs.

Policy H8: Houses of multiple occupation

The council seeks to avoid detrimental over concentrations of HMOs. Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where they:

³⁶ Ministry of Housing, Communities & Local Government, 'Local authority housing statistics data returns for 2016 to 2017', Available at: <https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2016-to-2017>

- Do not adversely affect the character and amenity of the area, or the supply of family housing.
- Do not contribute to the over concentration of HMOs in a particular area.
- Do not contribute to the generation of excessive parking demands or traffic in an area.
- Make appropriate provision for the storage of waste

Question H11:

Do you agree with the policy approach for HMOs?

Question H12:

Do you consider that the council should set locational criteria for HMOs, such as consideration neighbouring uses and proximity to other HMOs?

Question H13:

Should the council make use of Article 4 Directions to restrict the ability to convert properties to HMOs?

Self Build and Custom Housebuilding

- 4.46 National planning policy³⁷ advises that authorities should include people wishing to build their own homes when planning for the needs of different groups in the community.
- 4.47 The Government has also provided additional policy and guidance to support the demand from the self and custom house building market, which advises '*in considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout*'.
- 4.48 Self-build is generally where the owner is directly involved with/manages the design and construction of their new home, whereas custom housebuilding means the owner commissions the construction of their home from a developer/builder/contractor/package company who builds the property to the owner's specifications. With custom build the occupants do not usually carry out any of the physical construction work but still make key design decisions.
- 4.49 Medway's vision for 2035 includes an aspiration that new development in its towns and villages will have responded positively to the character of the surrounding environment and needs of existing communities. To support this vision, one of the objectives of the Local Plan is that Medway will be recognised for its quality of life, by

³⁷ Department for Communities and Local Government, '*National Planning Policy Framework*', paragraph 50, p.13, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

providing for the housing needs of Medway's communities that meets the range of size, type and affordability the area needs.

- 4.50 The need for plots of land on which people can build their own home has been identified through the Self Build and Custom Housebuilding Register, which relevant planning bodies have been required to have under legislation³⁸ from 1st April 2016.
- 4.51 Medway Council's Self Build and Custom Housebuilding register is publicised on the website³⁹ and operates in 'base years', which run from 31 October to 30 October the following year.
- 4.52 By the end of Base Period 2 (31st October 2016 – 30th October 2017) the council had received 39 applications, although 12 of these applicants indicated that they had also applied to be listed on the registers of other local authorities. Applicants are interested in acquiring plots across the Medway area for building their own house or bungalow, with plot sizes ranging from 0.01ha to 0.2ha and above. As at the end of Base Period 2 there has been no interest from associations (groups of individuals looking for a plot big enough on which they can each build their own home).
- 4.53 Chapter 2 of The Housing and Planning Act 2016 requires relevant authorities to give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. If the demand identified in the register is projected at the same rate to 2035, there will potentially be a requirement for around 600 self build/custom housebuilding plots to be granted permission in the plan period.
- 4.54 This policy encourages landowners and developers to offer plots to self and custom builders, enabling people to have the opportunity to build their own high quality homes, on both larger sites and smaller developments, which can also boost and support the local economy by providing opportunities for local tradespeople and small and medium sized builders.
- 4.55 This policy maintains one of Medway's strategic objectives of establishing quality design in all new development, respecting the character of the local environment and seeking opportunities to boost quality and improve the accessibility and design of the public realm.

Policy H9: Self-build and Custom Housebuilding

The council will support self-build or custom build home development in sustainable and suitable locations.

To identify and provide for people who wish to build their own home, the council will maintain a register of interested parties and report the headline data annually on the council website after the end of each base period.

All new self-build/custom housebuilding applications

³⁸ Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016)

³⁹ Medway Council, 'Self-build and Custom Housebuilding Register', Available at: <http://www.medway.gov.uk/planningandbuilding/planningpolicy/self-buildcustomhousebuild.aspx>

- Applicants will need to have regard to the local landscape and guidance from other relevant Local Plan policies in the same way that other types of residential applications do; this will ensure all types of new development are of high quality.
- If the number of self build plots on a single site exceeds 10, then a design code framework should be agreed with the council prior to the submission of individual planning applications. This will ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality.
- In accordance with Government guidance on Self-Build and Custom Housebuilding, the plots must be serviced (have access to a public highway and connections for electricity, water and waste water) or, in the opinion of a relevant authority, can be provided with access to those things within the duration of a development permission granted in relation to that land.
- Where a land owner has a suitable small site that they wish to obtain speculative outline residential permission for, they are encouraged to consider the plot for self-build or custom housebuilding, depending on the local demand.

Expanding/intensifying existing residential permissions

Where there is an existing residential permission and the developer approaches the council seeking to expand/intensify the development, the developer should demonstrate that they have considered some/all of the additional plots to be provided as serviced self/custom build plots, where there is identified demand.

Neighbourhood Plans

The council supports the consideration of self-build and custom housebuilding in the preparation of Neighbourhood Plans, and joint working with Neighbourhood Plan groups to establish a locally derived design code.

Council owned land and Regeneration

The council will consider opportunities for self-build housing in disposal of Council land and in promoting regeneration schemes.

Question H14:

Do you agree with the self build and custom housebuilding approaches taken above?

Self Build Site Allocations

In considering site suitability, some sites have been identified from the Strategic Land Availability Assessment (SLAA) as having potential for self build and/or custom

housebuilding use. Some of the larger sites may have potential for a proportion of the area to be suitable for self/custom build. The Council may seek to secure planning permission on any sites allocated for self/custom build by way of Local Development Orders after the Local Plan is adopted.

Question H15:

Do you think that the council should allocate specific sites for self/custom housebuilding development? If so, do you have any sites suitable for this use that you wish to promote for us to consider?

If we do allocate self/custom build sites, we will advertise them on our website. The land owner would also be expected to market the site. When allocating a site/part of a site for self/custom build, it is important that there is realistic expectation of interest in the site. However, due to circumstances out of the control of the council and land owner, the site may not receive the interest that had been anticipated. We therefore propose that once an allocated site has sold and built out a certain proportion of the self build plots, if the land owner is unable to sell the remaining plots after marketing them for a further period of time (to the satisfaction of the council), they will then be allowed to firstly offer the plot(s) to the council/housing association, before being allowed to build out on the plot themselves or sell to a non self/custom builder/developer.

Question H16:

Do you agree with the approach set above?

If yes, what proportion of the allocated site do you agree is an acceptable percentage to be sold and built out before the remaining plots could be offered to the council/housing association or other non self/custom builders?

After what further period of time of unsuccessful marketing do you feel it would be acceptable to offer the remaining plots on to the council/housing association or other non self/custom builders?

Sites over 400 dwellings

In order to satisfy the demand from the register, we propose that applications on sites over a certain number of dwellings should make available at least 5% of the plots to self/custom builders for purchase. We suggest a threshold of 400 dwellings and over. The developer will need to provide robust evidence to demonstrate if this is not economically viable. This would apply to applications on new Local Plan housing allocations or windfall sites.

Question H17:

Do you agree that sites over a certain size should offer a percentage of the plots to self/custom builders?

If yes, do you agree with the proposed 5% share of plots for self/custom build and the threshold of sites at 400 dwellings and over?

Question H18:

Following on from the question above, if a plot has been marketed (to the satisfaction of the council) for 12 months and not sold, we propose that it can then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market.

Do you agree with this approach outlined above?

Question H19:

With regards to these large sites of 400 dwellings or over, in order to prevent the completion of the overall site from being drawn out, exposing existing residents to extended periods of construction by their neighbours, we propose that if a plot is purchased by a self or custom builder, the dwelling must be built within 3 years of the date of sale, before being offered to other applicants on the self build register to purchase. If there is no interest, then it may then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. The onus would be on the developer to advise the council when each plot had been sold in order to monitor the development.

Do you agree with this approach outlined above?

Gypsy and Traveller Accommodation

4.56 Government policy⁴⁰ requires local authorities to make provision for the specialist accommodation needs of gypsy and traveller communities and travelling showpeople^{41,42}. Local planning authorities are required to assess the accommodation needs of the gypsy, traveller and travelling show person population in their area and to set pitch targets for gypsy and travellers and plot targets for travelling showpersons and demonstrate deliverable sites in the short and long-term.⁴³ In the Planning Policy for Traveller Sites, published in 2015, Government introduced a revised definition of gypsies, travellers and travelling showpeople and set out its approach to decision making and plan making in relation to traveller sites. The overarching aim of the national policy is to 'ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.'

⁴⁰ Housing Act 2004, Ch 34

⁴¹ Department for Communities and Local Government, 'National Planning Policy Framework', 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁴² Department for Communities and Local Government, 'Planning Policy for Traveller Sites', August 2011, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

⁴³ *ibid* 41

4.57 National policy defines gypsies and travellers as:

*'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.'*⁴⁴

4.58 The definition of travelling showpeople is:

*'Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers'*⁴⁵

4.59 There are presently 16 gypsy and traveller sites and 1 travelling showperson site in Medway. These include one public site at Cuxton, managed by Medway Council, and a range of permanent and temporary private sites. The council has commissioned a Gypsy and Traveller accommodation assessment to provide an updated evidence base for the new Local Plan.

Policy H10: Gypsy, Traveller and Travelling Showpersons

Safeguarding Existing Sites

Existing permanent authorised gypsy and traveller sites and sites for travelling showpeople will be retained, unless:

- There is a surplus of available accommodation over and above the required five year supply of sites, or,
- The site will be replaced by a site of similar proportions in an appropriate location which complies with the criteria listed below for new sites, or,
- A site has been granted a personalised permission restricting residency to a named occupier or family.

New Sites

Proposals for new gypsy, traveller and travelling showperson sites (temporary or permanent) will be permitted, in accordance with the council's planning policies if they meet the following criteria:

- Need – the council is satisfied that there is a clear need for the site and the proposal cannot be met on existing available sites or an allocated site
- Location – within an accessible walking distance to local facilities for education, healthcare, and convenience retailing.
- Not located in the Green Belt, flood risk zones 2 & 3, areas covered by landscape or environmental designations (AONBs, SSSI, Ramsar, SPA, SACs, Ancient Woodland or

⁴⁴ *ibid* 41

⁴⁵ *ibid* 41

local nature reserves), protected open spaces or protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas), or the best and most versatile agricultural land, of Grades 1, 2 or 3a).

- Scale – a site should respect its location and surrounding environment and be embedded within it and not intrude onto the landscape. The council will require a landscape strategy as part of the application to confirm the details of this.
- Pitches and plots should be of a sufficient size and, on sites for Travelling Showpeople have space for adequate storage.
- Access – there is safe and convenient pedestrian and vehicular access to the public highway, with adequate space on site for vehicle turning and parking

Question H20:

Does this represent a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs?

Question H21:

Do you consider that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan?

EMPLOYMENT

- 5.1 The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future. The planning system must support these ambitions. Government has set out its vision for the economy in the Industrial Strategy White Paper, 2017 that seeks to boost the UK's productivity. The strategy aims to address disparities in productivity across the country, improve skills, increase innovation and enhance infrastructure and business growth. All are relevant to Medway's ambitions set out in the vision and strategic objectives of the Local Plan, Medway 2035, and corporate plans.
- 5.2 A core ambition of the Local Plan is to strengthen the performance of Medway's economy, securing quality jobs in the local area, capitalising on the further and higher education offer, and realising the area's potential as the largest city in Kent, enjoying a strategic location in the Thames Gateway. Although Medway is a major economic hub in the south east region, it does not perform to its potential. It is significantly lagging in its productivity, as measured by Gross Value Added (GVA), residents have lower skills levels than neighbouring areas, and there are high levels of out-commuting.
- 5.3 In 2016/17, Medway had a working population of 140,300⁴⁶ people and around 92,000⁴⁷ jobs in the local economy. This is a slightly higher employment rate than the national average. The area's employment profile shares characteristics of neighbouring areas, but the economy has some specialisms in manufacturing and advance engineering. However Finance and IT businesses are under-represented, compared to regional levels. The 'public administration, education and health' sector contributes the most to Medway's economy overall at just under 22% of output, followed by 'distribution; transport; accommodation and food' at 18%. However it is notable that Medway's production and manufacturing sector is significantly larger, at 17%, than the level across the Kent Thames Gateway area (12%) and the UK average of 13%. This sector has also shown strong growth in recent years. It has expanded by 19% in Medway over the past five years, compared with growth rates of 15% for Kent Thames Gateway and 6% across the UK. Ports, wharves and energy infrastructure have built up around the river and estuary. Some of these installations are of strategic importance. Agriculture is a key industry in the rural area, making a significantly higher contribution to the local economy than the national average.

⁴⁶ Office for National Statistics, 'Annual Population Survey', ONS, 2012, Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/methodologies/annualpopulationsurveyapsqmi>

⁴⁷ Office of National Statistics, 'UK Business Register and Employment Survey', Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/businessregisterandemploymentsurveybresprovisionalresults/latest>

- 5.4 70% of people who work in Medway live within Medway. However, only 51% of Medway's economically active residents work in the area, reflecting high levels of out commuting. Many travel to work in Maidstone, Swale and Tonbridge and Malling, and including further afield to London.
- 5.5 At the end of 2017 Medway's out of work benefit claims (Universal Credit) rate stood below the national level at 1.8%, having previously been consistently above the national level previously. The claimant rate has halved over the previous four years⁴⁸. Medway has fewer medium to large businesses than nationally and a greater number of micro and small businesses⁴⁹, low rates of business start-up and survival rates, and a lack of higher value jobs. Medway's GVA per head at £17,338 in 2015⁵⁰, is amongst the lowest in the south east region and well below the national level. However the position is improving, with rates of growth in Medway's GVA over the past five years being 12% higher than the regional average. Research commissioned by ONS in 2017⁵¹ showed that smaller businesses were more likely to have lower productivity, as were younger businesses – those having been operating for less than five years. It also noted an 'overrepresentation' of service businesses - those in the distribution, hotels and restaurants industries – as being more likely to fall within this lower performing category. Medway has a slightly higher proportion of micro enterprises⁵² and has a higher rate of growth in these smaller employers over the last five years than in the South East and has a significant proportion of businesses in the distribution, hotels and restaurants sector⁵³.
- 5.6 A skilled workforce is critical to a successful economy, and Medway compares poorly with neighbouring areas. Just under a third of residents in Medway have achieved the highest level of qualifications (NVQ 4+) which is considerably lower than the level across Kent (37%) and the South East (41%)⁵⁴.
- 5.7 The council recognises that Medway has the potential to significantly boost its economic performance. This will be promoted by the Local Plan and the new Medway Regeneration Strategy, Medway 2035. These set out priorities for realising the area's economic potential, through establishing Medway as an attractive, sought after place to work and study, with a good supply of employment land and a supportive environment for business growth.

⁴⁸ NOMIS: Official Labour Market Statistics, 'DWP Benefit claimants - working age client groups', November 2015, Available at: <https://www.nomisweb.co.uk/articles/953.aspx>

⁴⁹ Office for National Statistics, 'Inter Departmental Business Register (IDBR)', ONS, Available at: <https://www.ons.gov.uk/aboutus/whatwedo/paidservices/interdepartmentalbusinessregisteridbr>

⁵⁰ Office for National Statistics, 2016, <https://www.ons.gov.uk/>

⁵¹ Office for National Statistics, 'Understanding firms in the bottom 10% of the labour productivity distribution in Great Britain: "the laggards"', 2003 to 2015: Available at: <https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/regionalgrossvalueaddedincomeapproach>

⁵² Enterprises employing less than ten employees.

⁵³ NOMIS, 'NOMIS Local Authority Profile: Labour market profile', February 2018, available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157282/report.aspx?town=Medway>

⁵⁴ Office for National Statistics, 'Annual Population Survey', ONS, 2012, Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/methodologies/annualpopulationsurveyapsqmi>

- 5.8 Medway's location within the Thames Gateway offers excellent opportunities to capitalise on regeneration and other investment, and to stimulate business growth, benefitting from connectivity to the wider economy through the motorway and rail networks. It is well placed to accommodate businesses seeking to relocate from London. The area's strengths include its established distribution routes; defined logistics and manufacturing locations; and proximity to the large markets in London and the South East. Work on the new London Plan identifies potential for relocation of employment activities outside of London, aligned to new investment. The breadth of Medway's employment land portfolio provides options for diverse companies. The large strategic employment sites on the Hoo Peninsula offer particular potential for businesses that could make use of the access to rail and water based freight transport. Investment in recent years to improve connections to these strategic employment sites has resulted in significant business developments, such as the London Medway Commercial Park at Kingsnorth, offering serviced plots to accommodate 2 million sq ft of land for industry, distribution and warehousing.
- 5.9 Since the 1990s, there has been a major expansion of higher and further education in Medway. A learning quarter has been established in Chatham Maritime, with the Universities at Medway, Mid Kent College and the University Technical College all located here. This unique offer presents great opportunities to raise skills levels and enable further economic development based on a knowledge economy, providing for higher value employment that could drive the success of the area. Encouraging Medway students to consider local universities could help increase student retention, and links between schools, businesses and colleges have been put in place.
- 5.10 The council supports opportunities to strengthen the local economy through encouraging development of businesses in successful growth sectors, and diversifying the employment base. Medway's promotion of culture and heritage provide opportunities for extending businesses in the creative, leisure and tourism sectors. Working with the strengths of the local economy, such as advanced manufacturing and technology are central to the economic strategy. There is an increased focus on the healthcare sector to reflect growing and ageing populations. The government is promoting modular housebuilding and modern methods of construction to help boost the supply of housing the country needs. Medway and the surrounding areas are areas of high growth, and the Council supports opportunities for modular construction factories in employment sites like Kingsnorth. This would develop modern and sustainable construction techniques that could benefit Medway, as well as boosting the local economy.
- 5.11 The economic strategy is closely linked to Medway's regeneration plans, delivering investment in urban and waterfront sites, including the provision of new employment space. New developments in the urban core can provide attractive and accessible locations that meet the needs of modern businesses. These are reflected in the aspirations for the 'opportunity areas' in central urban areas, that could boost the vibrancy and competitiveness of Medway's town centres, through new commercial uses complementing the retail, community and leisure offer. The development of new employment units at Watermill Wharf in Strood provides an example of how new sites can be brought forward for businesses. Work in attracting inward investment and

bringing forward quality employment, and supporting local businesses, is complemented by a strategy to improve the skills levels of Medway's residents, helping to boost a competitive labour force.

- 5.12 Responses to earlier consultation on the emerging Local Plan supported the use of brownfield sites with good access for employment, and opportunities in town centre locations arising from regeneration initiatives and linked to the Universities in Medway. Infrastructure and attractive, accessible locations were considered as key to successful business growth. There was some confidence that rates of out-commuting could drop if Medway was able to offer a greater range of quality jobs locally. Issues were raised in relation to the specific needs of sectors of Medway's economy, such as agriculture, marine and leisure businesses.

Employment land needs

- 5.13 Medway has a shortfall of quality employment land in locations and in flexible formats that businesses seek. Changes to planning legislation allow for commercial buildings to convert to other uses, such as residential, through a prior approval route. This is increasing competition on employment land and contributing to potential deficits in land supply for businesses.

Employment Land Needs Assessment

- 5.14 In support of the Local Plan, Medway Council commissioned an Employment Land Needs Assessment in 2015. The study focussed on:
- identifying the future growth needs across the authority
 - setting out a strategic level spatial strategy to guide future site allocations and
 - ensure the appropriate capacity is available in the most appropriate locations.
- 5.15 The assessment identified that the existing economic assets of Medway were likely to drive future economic opportunity. The clusters of creative, digital and advanced manufacturing businesses in particular will be key components of the future economy as these sectors are driven by wider economic trends and increasing agglomeration opportunities. Growth in these high added value sectors will also link to key physical assets and opportunities including the Universities at Medway Engineering School and plans for the Innovation Park Medway, centred around Rochester Airport. The creative and digital sector is a high value sector that has increased in importance, supported by the presence of the University for Creative Arts (UCA), and the proximity to markets in London, facilitated by the high speed rail links. In seeking the retention of graduates from UCA, there will be a requirement for studio style premises in urban areas, such as the lower High Street and potentially at Chatham Waters. These will be embedded in the council's regeneration plans, to ensure a competitive economy, as part of a balanced development strategy, with job creation keeping pace with housing growth.
- 5.16 Economic growth could also be driven by new opportunities created by major investment in new infrastructure. The delivery of a new Thames Crossing alongside existing strategic road connections and accessibility to key markets in London and

the South East could enable Medway to play a much enhanced role in the strategic distribution market which has, traditionally, been focussed in other parts of North Kent. A range of sectors could also be boosted by the delivery of a major entertainment resort at Swanscombe, largely through increased demand from supply chain activities. In common with the government's Industrial Strategy, the council has identified infrastructure as critical to economic growth. The options for the Local Plan's development strategy set out in Section 3 of this consultation document, are predicated on delivering significant upgrades in infrastructure. In particular, ambitions for strategic transport improvements provide the basis for strengthening regeneration plans and supporting sustainable development on the Hoo Peninsula. Improved access by rail and road to the Hoo Peninsula would boost economic growth.

- 5.17 The Employment Land Needs Assessment projects a growth of c.17,000 jobs in Medway over the plan period and considers the land needed to support this level of growth. The findings indicate that although there is a potential surplus of employment land available in Medway, due to the particular offer of the large strategic sites on the Hoo Peninsula, the land supply does not align well to meeting the full range of business needs projected over the plan period. The report identified a need for 90ha of employment floorspace for the plan period.

Employment Land Needs

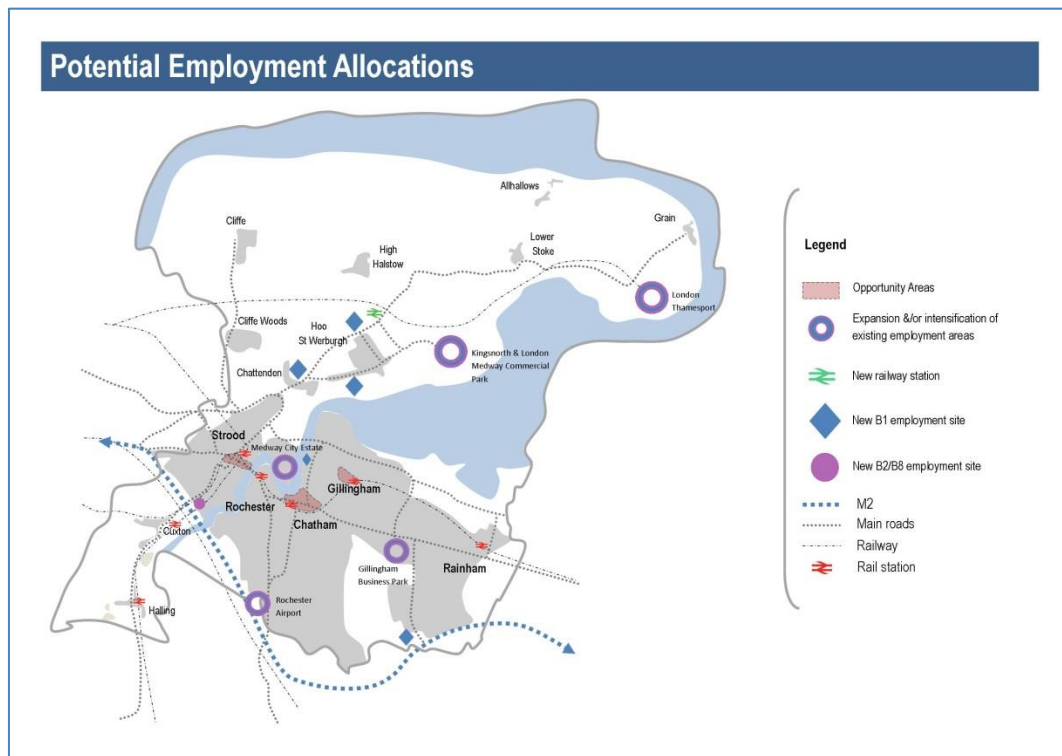
Employment (sqm land requirement) 2012-2035	Office	49,943
	Industrial	155,748
	Warehousing	164,263

- 5.18 The identified employment land need could be met through consolidation and intensification of existing employment sites to provide the right offer. Opportunities to provide employment floorspace on the edge of centres should also be explored. Mixed use schemes in these locations could deliver well serviced, flexible office spaces close to town centres and with good quality ICT connections. This would align well with the council's regeneration ambitions for town centres, and would be critical to securing greater 'knowledge economy' activity. The council recognises particular opportunities around Chatham, Gillingham and Strood. There will also be a need to ensure high quality 'hybrid' industrial space can come forward to support advanced manufacturing activity, which may need to extend beyond the space planned for the Enterprise Zone at Innovation Park Medway. Recent successful developments on sites such as London Medway Commercial Park show how appropriate investments can adapt to changing market needs. In considering broad locations as development options for Medway's growth over the plan period, the council will seek to include employment land as a key component of sustainable development. This is particularly significant for the regeneration areas and strategic allocations. The development of a rural town on the Hoo Peninsula could provide new attractive employment floorspace, complementing the large strategic sites at Grain and Kingsnorth.

Developing a diverse and flexible portfolio of employment land

- 5.19 The Local Plan needs to provide a range of sites to meet the employment needs identified in the Employment Land Needs Assessment. This will involve the retention of existing employment sites; support for enhancing and consolidating current sites to better meet the market's requirements and make better use of land; and identifying additional locations that can provide attractive accessible sites for business growth. A key ambition is to raise the productivity of Medway's economy, therefore particular attention will be given to the development of higher value employment.
- 5.20 A review of existing employment areas shows that certain locations demonstrate the characteristics supportive of a mix of employment formats including:
- Chatham Maritime,
 - Gillingham Business Park,
 - Medway Innovation Centre and Compass Centre,
 - Innovation Park Medway
- 5.21 Other employment areas tend to be better focused on more land intensive light and heavy industrial activities and distribution. These include Medway City Estate and Kingsnorth sites respectively. Whilst Medway City Estate has an element of office provision, the site suffers from poor public realm in parts resulting from its fragmented land ownership. The council will consider opportunities to realise greater value in this area. This could be part of a strategy to drive up quality improvements in Medway City Estate, or as part of a wider mixed use regeneration option in the longer term that could involve the potential relocation of businesses. Strood has significant potential to contribute to the mix of employment land needed in Medway. Reconfiguration and investment in sites could deliver locations for higher value employment uses close to the town centre and motorway links. Additional opportunities to provide employment land, and extend the successful model of the Medway Innovation Centre, will be sought in conjunction with development options. Proposals for broad locations for new employment growth are shown in figure 5.1 below. Details of proposed employment site allocations will be presented in the draft Local Plan, informed by the preferred development strategy.

Figure 5.1 – Potential Employment Land Allocations



- 5.22 The evidence base shows that some employment sites are compromised in their ability to extend and flourish by adjacent land uses, often residential. The council will need to consider if the Local Plan should afford protection to such sites, or if redevelopment would be more appropriate over the plan period. Some regeneration sites are currently in use by businesses, and the plan will need to consider opportunities for appropriate relocation. This will include recognition of specific business requirements, such as transport links.

Innovation Park Medway

- 5.23 Innovation Park Medway is a strategic gateway economic hub centred around Rochester Airport. A master plan for the redevelopment of Rochester Airport was approved in January 2014. Redevelopment of the airport's operational infrastructure would allow land to be released for employment development. The ambition is to develop a very high quality commercial environment for predominantly B1 and B2 uses, including workspace for advanced manufacturing, engineering, R&D and prototyping. High value businesses offering skilled employment opportunities would be attracted into the innovation park because of the exceptional environment that could be developed. Innovation Park Medway has been awarded Enterprise Zone Status and secured over £8m of funding through the South East LEP for its development. It aims to be a focus for entrepreneurial growth with an on-site University hub to reap the value of strengthened links between local academic and industry partners

Policy E1: Economic Development

The council will seek to boost Medway's economic performance, securing a range of jobs for its workforce. The council will work positively with the local business community and major public sector employers, the Universities at Medway and further education providers, inward investors, strategic partnerships and neighbouring authorities to support sustainable economic growth and job creation.

The council will make provision in Medway for the scale, range, quality and locational requirements of employment land identified in the Employment Land Needs Assessment, 2015, or subsequent updated evidence. This will involve the safeguarding of sites, identification of redevelopment and investment opportunities, and allocations for new sites.

The plan will seek to increase the productivity of Medway's economy, as measured through GVA, through support for higher value employment. This will include the designation of specific employment sites as suitable for higher value employment. All planning applications for employment uses will be assessed for their GVA contributions and whether the proposed use is best aligned to the site characteristics and locational offer. The council and its partners will promote growth of employment sectors that have the best potential for higher value jobs.

The council will support actions to:

- Consolidate economic benefits from the regeneration programme in Medway, specifically seeking to strengthen the role of the town centres in providing wider job opportunities;
- Raise skills levels and provide apprenticeship and local labour opportunities;
- Realise opportunities for raising higher value employment through supporting the development of the Universities at Medway and the wider learning quarter, and linking to growth in the wider economy;
- Seek to accrue benefits for Medway's economy from strategic developments of infrastructure, housing and employment sites outside of the borough;
- Explore the extension of the successful Medway Innovation Centre model to provide additional serviced employment space for businesses;
- Seek the installation and upgrade of high speed broadband services in employment sites;
- Promote the diversification of Medway's economic base; and
- Secure sustainable employment uses for the strategic sites at Grain and Kingsnorth, achieving value from the specific location offer and the access to water and rail for freight movements, and realising opportunities for manufacturing of modern modular construction facilities.

Question E1:

Do you consider that this is an effective approach to securing and strengthening Medway's economy?

Question E2:

Which locations do you consider are the most appropriate for employment growth?

Question E3:

Do you agree with the proposed approach to assessing GVA with planning applications for employment uses?

Question E4:

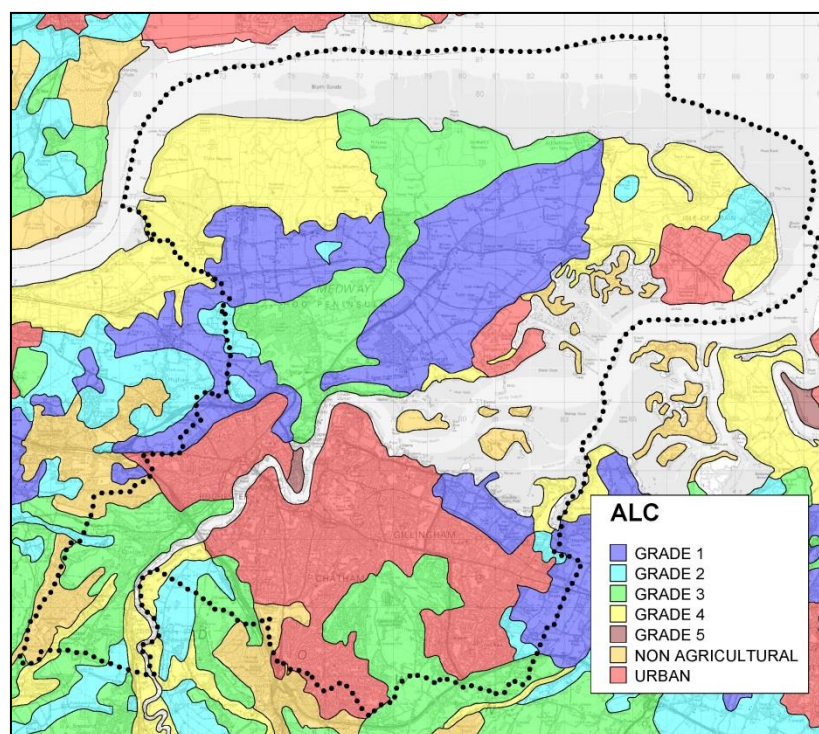
Do you support the proposed approach for higher value jobs in Medway?

Question E5:

Do you consider that there is demand for further serviced office accommodation in Medway?

Rural Economy

- 5.24 Government policy supports the sustainable growth⁵⁵ of the rural economy, considering the needs of the agricultural industry⁵⁶, and the development of rural businesses, tourism and leisure opportunities and the protection of local services and community facilities.⁵⁷ Farming and forestry are important land uses in the rural area, and Medway's countryside contains some of the best and most versatile agricultural land. This is defined as Grades 1, 2 and 3a, which is the most flexible, productive and efficient, and which can best deliver food and non-food crops for future generations. Local planning authorities are expected to take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, councils should seek to use areas of poorer quality land in preference to that of a higher quality.



- 5.25 Medway's countryside supports a range of forestry and farming activities. A total of 8,252ha of land is farmed for cereal, horticulture and livestock grazing.⁵⁸ Cereal

⁵⁵ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 28, p.9, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

⁵⁶ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 161, p.39, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

⁵⁷ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 28, p.9, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

⁵⁸ Department for Environment, Food & Rural Affairs, 'Structure of the agricultural industry in England and the UK', 2016, Available at: <https://www.gov.uk/government/statistical-data-sets/structure-of-the-agricultural-industry-in-england-and-the-uk-at-june>

production is dominant amongst these land use types. Although only accounting for a small proportion of the total land use, the horticultural sector has particular importance in Medway. Across the South East, horticultural production accounts for 1.6% of the total farmed area, but delivers around a third of the entire agricultural output value in the region. It represents the most valuable agricultural sector in the region, where the Thames Estuary area is a key structural component. Top fruit and soft fruit production in the Thames Estuary is potentially equivalent to over 11% of the national resource. Medway contributes around 6% of fruit and vegetable production to the South East total.

- 5.26 A notable feature of Medway is the high proportion of land that falls within the best and most versatile categories. Just under 40% of Medway's agricultural land is classified as Grades 1 or 2. Some of this land borders urban and rural settlements, where there is pressure to bring land forward for development. The development strategy options set out in Section 3 of this consultation document involve the loss of some of this farmland. In considering the options available to Medway to meet the development needs over the plan period, the council has had to weigh up complex and competing criteria and interests. Although potentially some good quality farmland could be lost to development, there will still be a high proportion of this resource in Medway. The council will also seek to secure agricultural businesses outside of allocated development sites by recognising its key role in the countryside.
- 5.27 The land based sector nationally is facing a number of changes and potential challenges. The decision to leave the European Union has implications and opportunities for the support for agricultural production and investments in the wider rural environment and communities. The horticultural sector has a need for seasonal skilled labour, and there may be restrictions on the movements of agricultural workers from eastern Europe, which form an important component of the labour force in local horticultural businesses. New government policy and funding programmes for agriculture will provide further guidance on these matters.
- 5.28 Climate change and technological developments may provide both threats and opportunities for agricultural businesses. There is scope to grow new crops and make more efficient use of land and water resources. There is continued interest in the wider use of land, such as for growing energy crops, or as a location for renewable energy facilities. Diversification and consolidation of farming activities is an important consideration in securing the rural sector.
- 5.29 In diversifying and growing businesses in forestry and farming, there is often a need for supporting infrastructure, such as processing and packing facilities. These can sometimes present significant change in the rural landscape, and need careful consideration to balance the needs of rural businesses with safeguarding the character of the countryside.
- 5.30 The council recognises that the rural economy extends beyond farming and forestry. There are a range of businesses based in the rural area. Rural businesses experience particular issues with accessibility and quality of broadband services that are often of a lower standard than provided in urban areas. Medway's rural area offers opportunities to develop further employment based in the tourism and leisure

sectors, responding to the special characteristics of the countryside. Medway's villages provide a range of services and facilities for residents, such as shops and pubs. These small businesses are critical to the sustainability of rural community life. The development of a small rural town on the Hoo Peninsula as part of the proposed growth strategy for the Local Plan would require specific employment land provision to provide for its economic needs and function.

Policy E2: Rural Economy

The council will support the land based sector in Medway, through seeking to direct development to land of lesser agricultural land, where feasible, and promoting the sustainable development and diversification of farming and other land based rural businesses, where the proposals can demonstrate positive benefits and do not conflict with other policies in the Local Plan. The council will define countryside areas outside of the urban and village settlement boundaries, where the land based economy will be supported providing that it does not conflict with requirements to conserve and enhance the environment.

The council will support the growth of rural businesses in well-designed development in appropriate locations that respect the character of the countryside and environmental features. Sustainable rural tourism and leisure activities that are in keeping with their rural setting will be supported.

The council will seek the retention of key rural services and facilities to promote sustainable villages, providing for the needs of rural residents.

Question E6:

Do you agree with the proposed policy approach for the rural economy?

What alternative approaches would you propose?

Tourism

5.31 The tourism industry is vitally important to the UK with the greatest number of overseas visits nationally on record in 2015⁵⁹. The sector has continued to grow nationally with an increase of overseas visitors and overall spend relating to tourism up by over 8% between 2016 and 2017.⁶⁰ Tourism is central to the council's ambitions for the area, promoting a positive image for Medway, supporting jobs and a vibrant cultural life. It sits at the heart of the regeneration strategy, Medway 2035. Much activity is focused around the area's rich heritage, notably Rochester and the Historic Dockyard at Chatham, and an extensive offer of festivals, events and concerts. The castles, forts and defences around Medway are distinctive landmarks

⁵⁹ Visit Britain, Department for Digital Culture Media and Sport (DCMS), '*Tourism Action Plan*', August 2016, Available at: <https://www.visitbritain.org/governments-tourism-action-plan>

⁶⁰ Department for Digital, Culture Media & Sport, '*Tourism Action Plan – One Year On*', (DCMS), October 2017, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653396/Tourism_Action_Plan_-_One_Year_On.pdf

of its military heritage. There are strong cultural associations with Charles Dickens, extending from historic Rochester to the atmospheric marshes of the Hoo Peninsula.

- 5.32 However as a growing modern city with a large student population, and close connections to London, Medway's offer to visitors is broadening, as demonstrated in the opening of new art galleries, venues and cafes. The Historic Dockyard is increasingly known as the backdrop for many films and primetime TV dramas. Medway continues to invest in its visitor offer, with the £9m Command of the Oceans gallery at the Historic Dockyard, and major events planned for 2020 marking the 150th anniversary of Dickens' death.
- 5.33 The rural areas of Medway offer great opportunities for walking, cycling, birdwatching, fishing and water sports. The area has some of the highest value landscapes, environmental and heritage features, many derived from the area's military past. The RSPB has major reserves on the Hoo Peninsula at High Halstow and Cliffe, offering spectacular views of birdlife over the marshes. Ranscombe Farm Reserve in Cuxton occupies 560 acres on the slopes of the Kent Downs, offering opportunities for quiet walks with links to the wider countryside. The rural areas need to be conserved to safeguard their environmental and heritage features, but they also provide opportunities for sustainable tourism, sensitive to the area's special character.
- 5.34 Tourism research⁶¹ commissioned by the council has confirmed that tourism makes a significant contribution to Medway's economy. With just over 4 million day visitor trips and around 528,000 visitor stays per annum, the tourism sector in Medway directly accounts for approximately 4,500 jobs (FTE) and has an estimated value of around £313 million per annum. Much of the activity is concentrated on a day trip market, but river based tourism is also an important strand of the market in Medway, estimated to be worth approximately £2m.
- 5.35 Medway seeks to strengthen its tourism sector through consolidating the well-established heritage offer, improving its venues and facilities for arts and culture, supporting the growth of areas such as rural and marine based tourism and promoting opportunities to extend visits beyond the day trip market, capturing more overnight stays and the associated higher spend of visitors.
- 5.36 There are 14 hotels in Medway, with a total of 894 letting bedrooms. The Medway hotel supply is predominantly a mix of 3 star and budget hotels, together with one 4 star hotel, two small 2 star hotels and two small non-inspected hotels. Limited service (budget) hotels account for just over one half of Medway's hotel supply. There has been a significant growth in hotel accommodation in Medway over the past 5 years. Studies of the hotel market in Medway show high levels of demand for visitor accommodation, much of which is in the budget market. There is scope for continued growth. Medway is well placed to benefit from strategic developments, such as the proposed London Paramount entertainment park on the Swanscombe

⁶¹ Destination Research delivering results: measuring what matters, *'The Economic Impact of Tourism'*, Medway 2015, Available at: https://www.visitkentbusiness.co.uk/library/Economic_Impact_of_Tourism_-_Medway_2015_FINAL_REPORT.PDF

Peninsula, both from potential visitors to the attraction and workers during the construction period. In addition to growing demand from corporate and contractor markets, the development of creative industries and a wider cultural offer in Medway will support a demand for a high quality, boutique hotel offer.

- 5.37 Other forms of visitor accommodation are available in bed and breakfast, guest houses, hostels, a youth hostel, self-catering properties, camping and caravan sites. The latter are largely located in the rural areas of the Hoo Peninsula. Bourne Leisure operates a major leisure park at Allhallows, providing visitor accommodation in static caravans. An estimated 28,000 tourist trips to Medway are made through static caravan, touring vans and camping holidays. These represent an estimated 151,000 night stays bringing in approximately £3.9m for Medway's economy per annum. This mainly relates to static caravan sites as there are currently very limited touring camping and caravanning sites.
- 5.38 Responses to earlier rounds of consultation on the Local Plan supported the development of Medway's tourism sector, linking to the particular offers of the natural environment, heritage and culture, and realising the opportunities of waterfront regeneration. A greater supply and mix of visitor accommodation was sought.
- 5.39 In progressing the regeneration ambitions for Medway, as promoted in Medway 2035, the council recognises the importance of planning for a good quality public realm and providing a mix of leisure, food and drink offers in the town centres and waterfront areas. These can help provide a positive experience for visitors, support the development of an evening and cultural offer, as well as boosting the local economy.
- 5.40 The potential to achieve greater value from the use of Medway's river frontage is a key aspect of the council's regeneration plans and tourism aims, and enjoys much public support. In the central urban areas, the waterfront provides an opportunity to link the area's most notable heritage assets, and provide a focus for cultural activities. In the rural areas, the river and estuary can provide a place to relax. The England Coastal Path will run along Medway's river fronts and estuaries and around the Hoo Peninsula linking Riverside Country Park with the RSPB's reserve at Cliffe Pools. Given the wildlife importance of the natural environment in the estuaries and marshes, it is essential that access is carefully managed to avoid damage to the area's special features, including the designated habitats and landscapes.

Policy E3: Tourism

The council will positively promote sustainable tourism development that can make a positive contribution to Medway's economy and cultural life. Appropriate proposals for the development of tourism facilities and visitor accommodation will be supported where they meet the principles of sustainable development.

Tourism developments that can contribute positively to the regeneration of Medway, consistent with the council's vision, and extend the cultural offer will be considered favourably. Opportunities for development to enhance the vibrancy and vitality of town centres will be welcomed.

The enhancement of cultural assets and visitor facilities will be supported, where they respect the integrity of the surrounding area, particularly those assets associated with the local historic environment.

Opportunities to support the development of rural and marine based tourism will be welcomed, where they can demonstrate that negative impacts on the environment can be avoided.

Proposals for tourism facilities will be assessed against the principles below:

- Identified need for creation, expansion or improvement of tourism facilities.
- The proposal is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment.
- Maximises opportunities for sustainable travel.

Question E7:

Do you agree with the proposed policy approach towards tourism?

Would you suggest an alternative policy approach?

Visitor accommodation

- 5.41 Evidence supports the expansion of the supply of visitor accommodation in Medway, across a range of markets, including budget and high quality hotel rooms, self-catering, camping and caravanning, and berths and marinas. In making provision for additional visitor accommodation, the council will have regard to its aims for regeneration, developing the cultural and heritage sectors, and opportunities for enhancing the supply in marine and rural tourism markets. The development of the tourism sector will be in line with the strategy promoted in the new Local Plan, respect the character of the surrounding areas, and respond to the specific opportunities of Medway's diverse offer. This could include the provision of camping and self-catering accommodation in rural areas, sensitive to the countryside setting.
- 5.42 As Medway grows over the plan period, there are opportunities to consider the provision of new visitor accommodation in conjunction with wider mixed developments. The urban regeneration sites offer significant opportunities. Such proposals could have the benefit of providing leisure facilities which are available to local communities.
- 5.43 Medway's high quality countryside is an important tourist asset, and is growing in interest as a place to visit for leisure. Capitalising on the countryside as a visitor destination could nurture a growing rural economy. There is a demand for quality rural self-catering accommodation. However developments need to be sensitive to the special characteristics of the countryside and Medway's rural environments, particularly the extensive areas designated of wildlife and landscape importance.

Policy E4: Visitor accommodation

The retention and provision of visitor accommodation is encouraged in accordance with the principles set out below:

- Where it meets a proven need, particularly those sectors of the market where evidence indicates unmet demand, such as a high quality boutique hotel in Rochester, and quality rural self-catering accommodation.
- Development enhances the quality and offer of existing visitor accommodation and its setting.
- Where the proposal contributes to the vibrancy, vitality and viability of town centres and the sustainability of wider settlements.
- Where the proposal avoids negative impacts on the environment, is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment, avoids siting in areas of high flood risk and intrusion into the landscapes of open countryside.
- Maximises opportunities for sustainable travel in accessible locations and minimises traffic generation.

Question E8:

Do you agree with the proposed policy approach for visitor accommodation? Would you suggest an alternative policy approach?

SECTION 6

RETAIL AND TOWN CENTRES

- 6.1 Town centres play an essential role in community life and are intrinsic to perceptions of places. National planning policy states that town centres should be recognised as the heart of their communities, and Local Plans should pursue policies to support their viability and vitality. Town centres bring people together to shop, do business, and enjoy leisure time, and can also be a place to live. Medway has a complex geography with five towns, and many neighbourhood, local and village centres at a smaller scale. There is also a district centre at Hempstead Valley, which has a good presence of major retailers.
- 6.2 There have been radical changes to how we shop over recent decades, notably the rise in online shopping. These trends have led to changes in our traditional high streets, with decline in some town centre and the closure of many retailers. Changes to permitted development rights have extended the ability to change the use of buildings in town centres, such as from shops to restaurants and homes. Retailers have shown more interest in developing in out of centre locations, such as retail parks, rather than in town centres. Local people in Medway have raised concerns about the health and attractiveness of the main centres, and have asked that the Local Plan address decline in areas such as Chatham, Gillingham and Strood. This is central to the plan's vision and strategic objectives for economic success, environmental wellbeing and quality of life. The Medway 2035 regeneration strategy also promotes a strong and revitalised role for town centres.
- 6.3 Medway Council commissioned a North Kent Retail Study⁶² in collaboration with Gravesham Borough Council as part of the evidence base for the new Local Plan. The findings for Medway recommended the following:
- A need for 46,100m² comparison floorspace by 2031 and 70,500m² by 2037⁶³
 - A need for 12,300m² of convenience retail floorspace by 2031 and 13,200m² by 2037⁶⁴
 - There is anticipated to be a growing spend in leisure (£237million), predominantly commercial leisure (restaurants and cafes) over the plan period. Medway's centres should focus on developing their evening economy to capture some of this spend.
- 6.4 In addition to the work commissioned in the Medway Retail Needs Assessment, the council has surveyed town, neighbourhood, local and village centres across Medway to inform policies and allocations in the new Local Plan.
- 6.5 In terms of specific advice for each of the centres, the North Kent Study advised that Chatham remains at the top of the hierarchy and should be the main location for

⁶² GVA, 'Retail and commercial leisure assessment', North Kent SHENA, Volume 1: Nov 2016, Available at : <https://www.medway.gov.uk/pdf/with%20Gravesham%20caveat%20NKSHENA%20Retail%20Vol%201%20Main%20Rept%20FINAL%20NOVEMBER%202016.pdf>

⁶³ This figure does not include commitments for floorspace

⁶⁴ This figure includes commitments for floorspace

additional comparison retail growth. No further comparison retail was recommended for any of the other centres. In order to improve Chatham it is recommended that:

- public realm works be undertaken to improve its appearance,
- sites are actively brought forward,
- further opportunities for convenience retail are explored,
- improve and plan for a stronger evening economy through commercial leisure provision; and
- resist out-of-centre proposals.

6.6 More specifically, the following recommendations were made for the remaining centres on the back of retaining the hierarchy of centres with Chatham at the top:

- Hempstead Valley: modernise and support day-to-day uses
- Rochester: consolidate rather than expand. Protect the primary shopping area (PSA) and provide a small foodstore if a site becomes available. Consider a cap on the provision of restaurants and cafes in order to protect the retail core.
- Strood: improve integration between the retail park and District Centre, and improve the public realm. No further expansion is recommended.
- Gillingham: Consider redevelopment of the former Budgens store.
- Rainham: Focus on refurbishing and/or redevelopment. Consider an additional foodstore if a site should become available.

Retail Strategy

6.7 Medway Council is committed to securing healthy and vibrant town and local centres to meet community needs, provide choice, and as an important component of our local economy. Town centres are key to sustainable development, as the cluster of services can minimise the need to travel, and they are well located in relation to a range of transport options.

6.8 Through the Local Plan, it will set out a strategy by which these ambitions can be met. The strategy aims to strengthen its centres through directing and retaining spend in the defined town centres, and managing proposals in inappropriate locations that would dilute the role and viability of the town centres. This may include clawing back some trade being lost to locations outside Medway. The strategy will also seek to manage other retail designations and larger retail locations to ensure each functions appropriately and complementary to the defined centres.

6.9 The Development Strategy options set out in Section 3 indicate that urban regeneration sites will form the foundation of the plan's growth. These offer opportunities to strengthen the role of town centres, including increasing the supply of housing and wider commercial and leisure activities. This approach would drive up footfall in town centres. The proposal for a rural town on the Hoo Peninsula would require specific development of a retail offer in line with the character and function of a small country town. Potential development in suburban areas would be required to avoid damaging the role of existing town centres. However dependent upon the scale

of growth, there may be need to invest in new retail to provide a local centre so that residents can easily access local services.

Retail Hierarchy

- 6.10 Medway has a number of different centres, ranging from a city centre function in Chatham; the district centres in the main towns and at Hempstead Valley shopping centre; and many local, village and neighbourhood centres. The North Kent Retail Study has confirmed Chatham's role at the top of the retail hierarchy supported by district centres and local centres and is consistent with national guidance. Further in-centre surveys and retail evidence⁶⁵ updates supports these findings. This hierarchy provides a network of supporting centres to provide for the needs of the local population in a sustainable way.
- 6.11 Chatham has the largest number of comparison retail units, the largest retail floorspace, and is connected by a good transport hub and parking provision. The council recognises the need for a review of parking and signage to ensure that there is clear information about parking availability. This could help address perceptions that car parking can be difficult or in unsecure locations. Recent surveys have confirmed that people generally visit Chatham for comparison retail shopping. The district centres are distinctive with their own strengths and weaknesses, and need careful management to provide complementary offers and a healthy competitive environment. These district centres provide an important local and convenience function.
- 6.12 The retail hierarchy will clarify the sequential approach for prioritising and directing development to main town centres, and provide guidance on the approach for the requirement of new centres emerging from the plan's development strategy.

Policy RTC1: Retail hierarchy

The function of centres as multi-purpose destinations and the main locations for retail, community, leisure and employment will continue to be supported in relation to their individual role and scale. Chatham is the primary centre at the top of the hierarchy and will be the focus for the majority of comparison retail to meet the strategic needs for the authority and maintain its role in the hierarchy.

Medway's hierarchy of centres is:

I. Principal Town Centre: Chatham is the main location for comparison retail, community uses, leisure, culture and tourism (in support of local heritage assets and cultural focus).

II. District Centres: The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres: Strood, Gillingham, Rainham, Rochester, Hempstead Valley

⁶⁵ GVA, 'Retail and commercial leisure assessment', North Kent SHENA, Volume 1: Nov 2016, Available at : <https://www.medway.gov.uk/pdf/with%20Gravesham%20caveat%20NKSHENA%20Retail%20Vol%201%20Main%20Rept%20FINAL%20NOVEMBER%202016.pdf>

III. Local Centres: The authority seeks to maintain the sustainably accessed local top up shopping offer and to satisfy the day-to day needs of the local population

New local centres or shopping parades compliant with the council's retail policies may be required in the following locations depending on the defined development strategy and proposals maps in the Local Plan, the scale of the proposal.

- Hoo St Werburgh rural town
- Rainham East
- Capstone

Proposals will need to be supported by a robust justification talking into account the existing provision, character and scale of the area and the demographics.

Question RTC1:

Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway?

Question RTC2:

Do you agree with the definition of Chatham as the primary centre at the top of the hierarchy?

Question RTC3:

Do you agree with the identified district centres?

Question RTC4:

How do you consider that Dockside should be recognised in Medway's retail hierarchy?

Question RTC5:

Would you propose any alternative approaches to Medway's retail hierarchy?

Sequential assessment

- 6.13 Government policy supports the growth and sustainability of town centres through a 'town centre first' approach. This requires a sequential approach in site selection (for proposals not in the town centre and/or not in accordance with the development strategy in the local plan) in identifying the most appropriate location for main town centre uses. Sites in the town centre are considered first and then well connected sites in closest proximity to the town centre where no town in-centre sites have successfully been identified and so on.
- 6.14 The sequence of undertaking the sequential assessment reflects and supports the town centre strategy, retail hierarchy, and ambitions for each centre. This will ensure a sustainable approach to providing for the needs of the local population and providing the ability to respond to future changes. To achieve this, focus and first priority is given to Chatham to support the Council's ambitions. This is then followed

by Medway's traditional (high street) centres, which are the centres that require an economic uplift, enhancements and diversity in uses to provide choice and competition. Where sites are not available in Chatham, the district centres will be the locations sought to provide a balance of uses. Hempstead Valley Shopping Centre is third on the list, reflecting the stronger economic position and ability in providing for the local population. The Council has supported its growth but recognise that a balance needs to be achieved between all its centres to create a healthy competitive environment and provide for local needs.

- 6.15 Definition of catchment areas is the first step and needs agreement with the council and is dependent on the scale of the proposal and the sphere of influence and trade draw. Through the sequential assessment, the applicant must also demonstrate flexibility in scale and format particularly taking into account issues of locality. The sequential assessment must be proportionate to the scale of the proposal and/or importance of the site for delivery of the development strategy. Local garages can provide a top up convenience function where a retail use supports the main function. In such circumstances the ancillary nature of the retail use needs to be of appropriate in nature and scale in relation to the predominant use. There may be other circumstances that require an ancillary approach. However, this needs to be carefully managed to prevent impact on centres.

Policy RTC2: Sequential Assessment

Main town centre⁶⁶ uses are directed to Medway's centres as identified in policy RTC1.

Proposals to locate or expand main town centre uses outside of defined centres, and where not in accordance with any part of the retail and main town centre uses strategy in the development plan, are required to demonstrate through a sequential assessment, within an agreed and defined catchment area, that there are no sequentially preferable sites available in accordance with the following sequence:

I. Chatham

II. Strood, Gillingham, Rainham, Rochester

III. Hempstead Valley Shopping Centre

IV. Local centre or edge of centre, whichever is better connected and able to support 1, 2 or 3 listed above

V. Out of centre

When considering sequentially preferable edge and out of centre sites, following demonstration of the unavailability of more central sites, preference will be given to edge and out of centre sites that are accessible and well connected to town centres respectively, i.e. consideration of edge of centre sites first.

⁶⁶ Department for Communities and Local Government, 'National Planning Policy Framework', 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

The catchment area must be defined through discussions with the authority at the earliest opportunity and is dependent on the scale and type of the proposal and its ability to draw trade.

Large scale leisure proposals must be accessed by sustainable means, not have a negative impact on traffic and provide ease of access.

Proposals for ancillary development are required to be compliant with the policy set out above unless it can be:

- Justified as ancillary and necessary for the business operation;
- the type of use and scale of the proposal is secondary to the predominant/main use;
- demonstrated that there are dependencies between the proposal and the predominant/main use. Consideration will be given to the location of the proposal in relation to the predominant/main use;
- it may be necessary to manage the ancillary use through condition to maintain its secondary nature

The scale of the proposal may also require an impact assessment and therefore requires compliance with policy RTC3 where it meets the criteria.

Question RTC6:

Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Do you agree with the proposed sequential approach?

Would you propose alternative approaches?

Retail impact assessment thresholds

6.16 A range of factors, including recessions, the growth in online shopping, and the relocation and consolidation of main 'anchor stores' have left our high streets in a vulnerable position forcing a refocus of the role and function of our centres. The development of Bluewater shopping centre has had major impacts across a wide area, especially north Kent. The North Kent Retail Study concluded the underperformance of Chatham and the vulnerability of centres including Rainham, Strood and Gillingham. These centres have limited national retailer representation and are typified by low value/order retailer representation and a sub-standard public realm reflective of the lack of investment and a vulnerable local economy. The health of Medway's centres suffers while out of centre localities prove more viable and desirable. It is likely that further out of centre permissions will exacerbate the vulnerability and have a lasting detrimental impact on our centres. In contrast, Hempstead Valley has seen increased interest and recent investment in extending its offer.

6.17 The spending patterns indicate that a significant amount of trade is being lost to locations outside of Medway, particularly to Bluewater. Consumer choice is suffering,

with the comparison sector experiencing a low level of expenditure retention. Medway's centres may not be able to claw back a significant amount of trade, but by protecting and strengthening its centres and giving priority to all retail designations, healthier centres can be created to support the needs of the local population. There are stronger signs of market interest at Hempstead Valley, and a key consideration for the Local Plan, is the extent to which further development should be supported at this centre. Hempstead Valley could provide competition and choice for Medway residents, from external shopping centres, such as Bluewater. However growth at Hempstead would be seen to impact upon town centres, particularly Gillingham and Chatham.

- 6.18 When assessing applications for retail, leisure and office development outside town centres not in accordance with an up to date Local Plan, local authorities are expected by national policy to require an impact assessment with the application of either a locally defined threshold or the national set threshold of 2,500sqm. Proposals to date have relied upon the national threshold in absence of a locally defined threshold. 2,500sqm represents a large scale and quantity of floorspace compared to the typical size of units in each centre and would therefore have a significant impact. It is therefore too large to reflect the local context. In addition the cumulative impact of out of centre proposals will also have a resounding impact on the health of centres in Medway. Monitoring of retail developments in Medway⁶⁷ show that recently more planning permissions for A1 uses in out of centre locations compared to in town centres. This aligns with market demand being stronger in locations such as Hempstead Valley.
- 6.19 Given the vulnerability and regeneration initiatives for some of Medway's town centres, it is important that there is appropriate protection from the threat of trade being drawn to out of centre locations, and that a locally determined retail impact threshold be set. This will be defined by further detailed analysis of centres and the development strategy defined for the Local Plan.

Policy RTC3: Impact Assessments

Proposals that seek to locate or expand retail and other main town centre uses in edge or out of centre locations will be permitted where:

- a) it is supported by an impact assessment where proposals for comparison, convenience retail, or commercial leisure development exceeds a defined threshold set in the Local Plan; or other large scale leisure and office uses exceeds 2,500sqm.
- b) it is demonstrated that it would not have a significant adverse impact on:
 - Impact on the strategy - development, retail and main town centre uses strategy
 - Impact on vitality and viability of centres within the catchment of the proposal
 - Impact on existing, planned or committed town centre investment
 - Consideration is given to the cumulative impact of proposals considered relevant and to the health of centres

⁶⁷ See Medway Authority Monitoring Reports:

<http://www.medway.gov.uk/planningandbuilding/planningpolicy/authoritymonitoringreport.aspx>

- Consideration is given to the local context and the vulnerability of the authority's centres
- c) Where appropriate development proposals may be conditioned to reduce the impact on centres where there is an impact but is not considered significantly adverse to justify refusal.

Question RTC7:

Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Question RTC8:

Do you agree with the proposed approach to impact assessments?

Question RTC9:

What do you consider would represent an appropriate size threshold for developments to undertake an impact assessment?

Would you propose alternative approaches?

Frontages

6.20 Shop frontages play a key role in attracting footfall to centres. Very often the impact and value of frontages are ignored or underestimated. In Medway, the retail evidence⁶⁸ collated has confirmed the public's perception and observation of the centres public realm as needing improvements. Concerns about security often result in the use of grilled shutters that can detract from the quality of the public realm. Solid shutters can harm the appearance of centres, providing dead frontages, encouraging graffiti and, out of retail hours, create the perception of threatening and unsafe places to be. Centres also lack appropriate design guidance reflective of their distinct character. Improving the shop facades and public realm, where possible, forms part of the strategy to strengthen the authority's centres, attract more footfall and improve the local economy.

Policy RTC4: Frontages

Proposals within frontages of centres must be in accordance with the council's design policies and:

- provide an active frontage at ground floor level, which is accessible and attractive to pedestrians. The presence of a larger proportion of show window space is required.

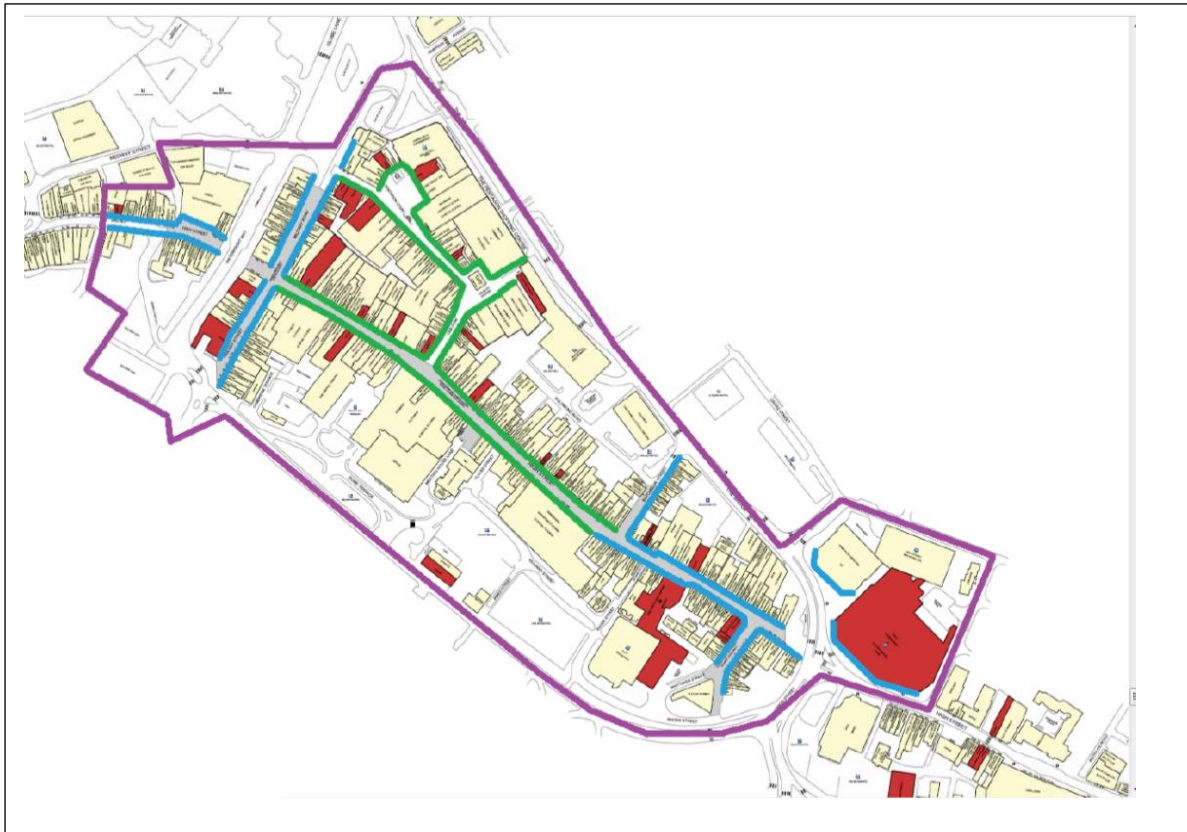
⁶⁸ GVA, 'Retail and commercial leisure assessment', North Kent SHENA, Nov 2016, Available at : <https://www.medway.gov.uk/pdf/with%20Gravesham%20caveat%20NKSHENA%20Retail%20Vol%201%20Main%20Rept%20FINAL%20NOVEMBER%202016.pdf>

- be of appropriate scale, format, design and character reflective of the facades above ground floor, the centre's role and function and the Council's ambitions as set out in RTC1 and RTC5.
- Protect and where possible enhance the public realm through well planned and coordinated planting, improvements to surfacing/paving and other environmental enhancements.
- Must demonstrate no harm to other neighbouring businesses, residential public and visual amenity through impacts such as noise, light, odour, late night activity, litter and general disturbance.
- Any proposals for shutters must maintain views into shops when closed, be back lit, powder coated and any housing should relate well to shop frontage and signage.

Definition of primary and secondary frontages

- 6.21 The NPPF requires Local Plans to define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages. The council will define town centre boundaries in the draft Local Plan, informed by further assessment and evidence, including site allocations. The council welcomes comments during this round of consultation on proposals for defined boundaries for Medway's town centres.
- 6.22 The North Kent study undertook an audit of uses in each of Medway's centres and made recommendations for primary and secondary frontages. The definition of these designations is fundamental to the consideration of planning applications in relation to the sequential approach for locating main town centre uses and ultimately to support the health of our centres. Policies to protect our centres will be based on these designations. The North Kent Study recommendations for primary and secondary frontages will be used as a basis to gauge the principle of these designations and the application of policy approaches in RTC5 below. In the maps below the designations are represented as follows:
- **Primary frontages (Green):** Includes a high proportion of retail uses which may include food, drinks, clothing and household goods. Will contain a higher representation of A1 use class.
 - **Secondary frontages (Blue):** Provide greater opportunities for a diversity of uses, such as restaurants, cinemas and businesses. Will contain a lower representation of A1 use class.
 - **Retail core (purple):** represented as a retail designation captured in the 2003 Local Plan and only used here for illustrative purposes.
 - **Vacant units (Red):** as at the time of survey in 2016.

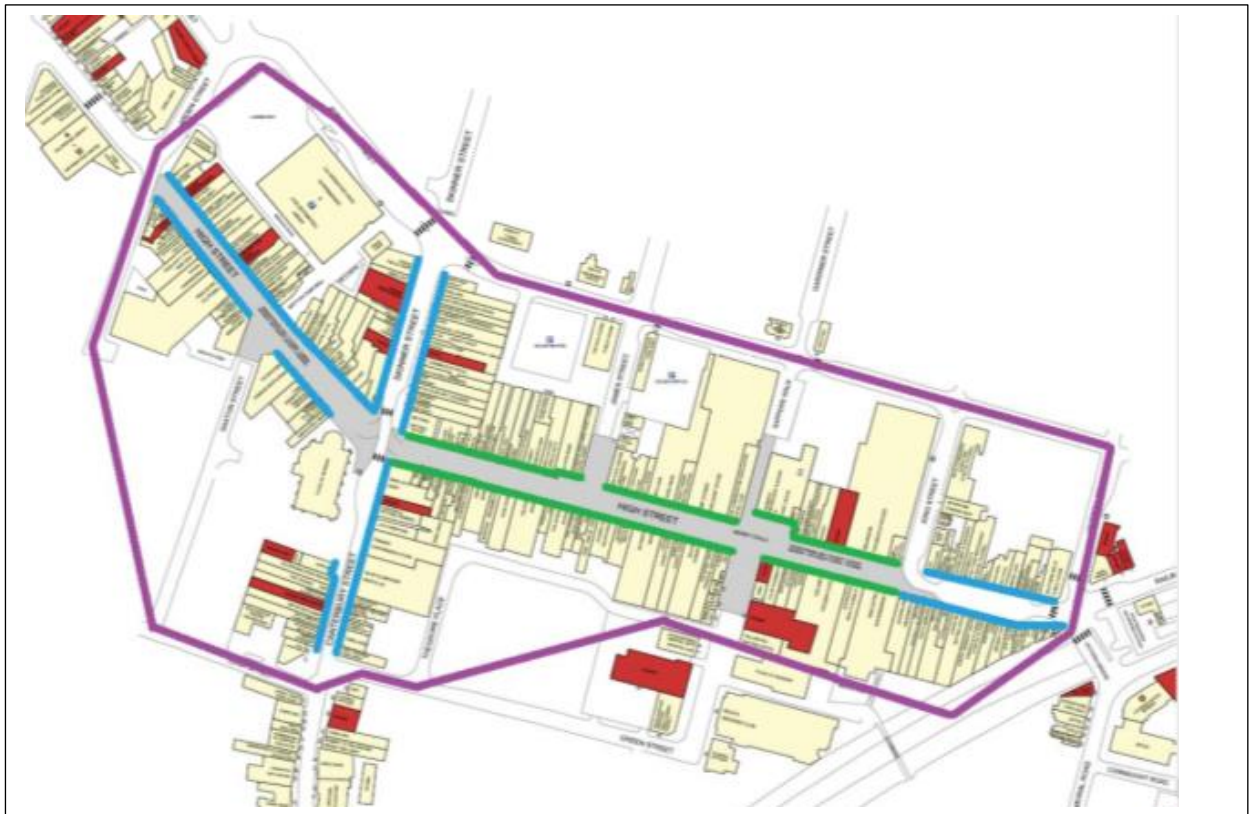
Retail Designation 5a: Chatham City Centre



Retail Designation 5b: Strood District Centre

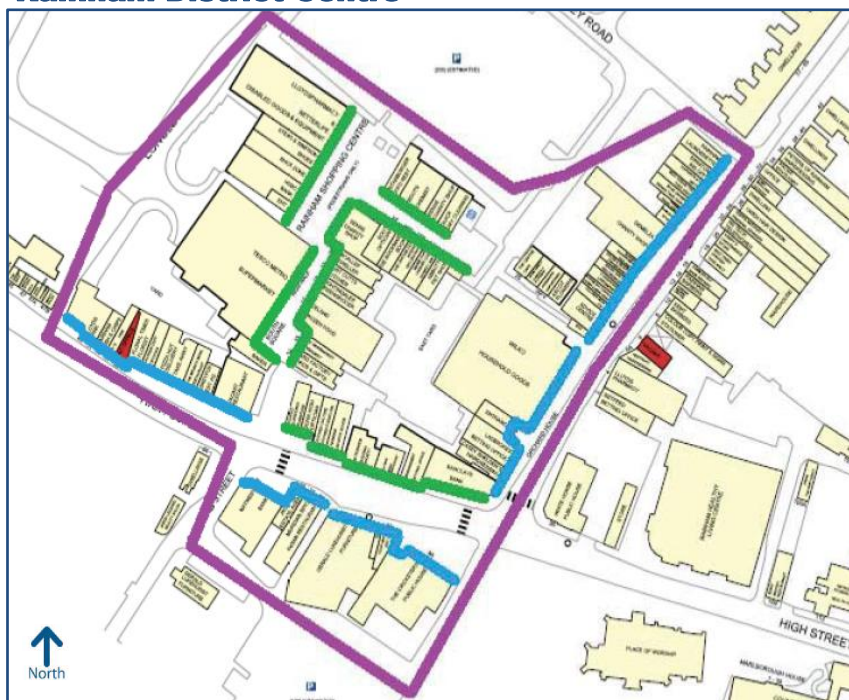


Retail Designation 5c: Gillingham District Centre

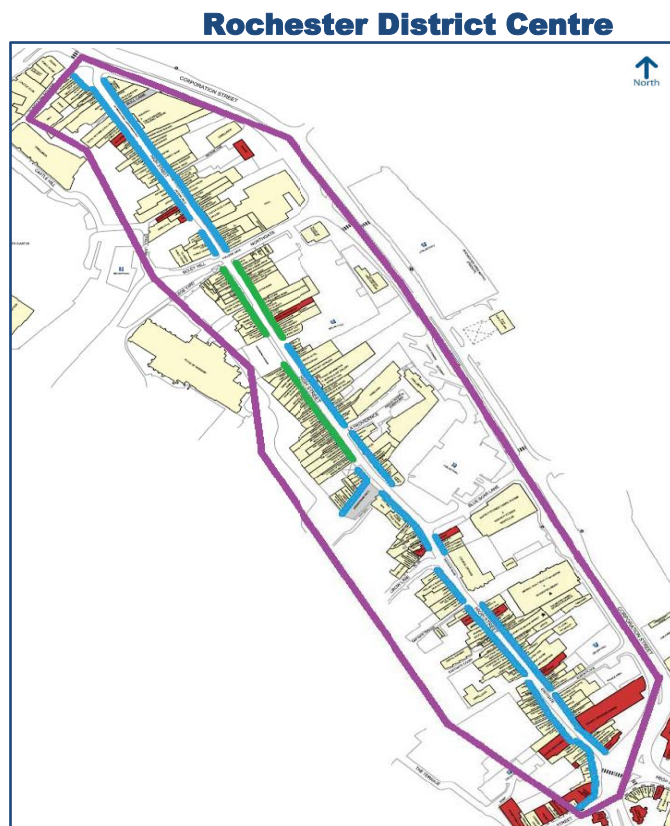


Retail Designation 5d: Rainham District Centre

Rainham District Centre

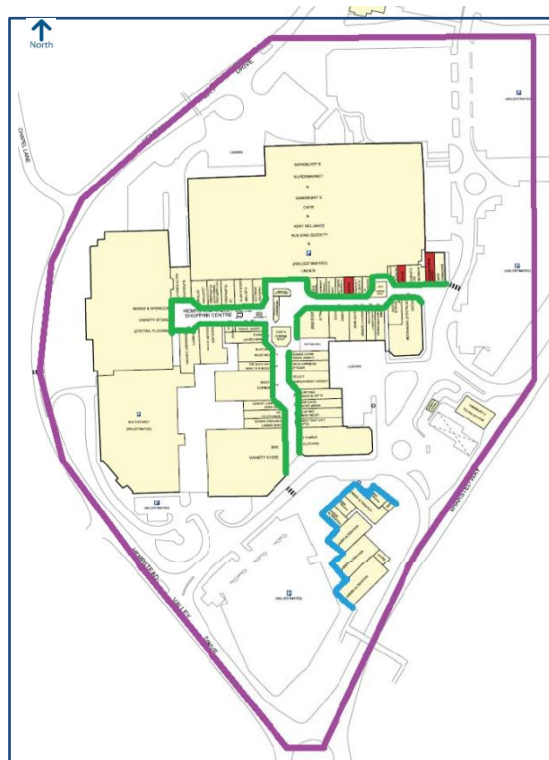


Retail Designation 5e: Rochester District Centre



Retail Designation 5f: Hempstead Valley District Centre

Hempstead Valley



Role, Function and Management of Uses

- 6.23 This considers the defined centres set out in figures 5a to 5f above. The council notes that the town centre boundaries as defined in the 2003 Medway Local Plan may require review as part of the new Local Plan.

Viability

- 6.24 Viability plays a significant role in identifying the locations where retail proposals are sought, with some out of centre locations providing a more attractive format, placing a threat on the viability and health of our centres, and resulting in vacancies. The relocation of main anchors coupled with online shopping have left our high streets in a vulnerable position forcing a refocus of the role and function of our centres.

Evening economy⁶⁹

- 6.25 Centres are multi-functional with operations across day and evening time. A number of Medway's centres lack or have a limited evening offer. Current evidence⁷⁰ shows a focus on leisure provision in support of the evening economy as a current trend. Commercial leisure, such as restaurants and cafes, also tend to be a complementary offer to tourist attractions

Health of centres

- 6.26 The North Kent Retail Study identified that Chatham was underperforming and the vulnerability of centres including Rainham, Strood and Gillingham. Hempstead Valley and Rochester were found to be performing well, reflecting their unique offer. Hempstead Valley is the preferred location of high value national retailers. Recent years have seen expansion of the family oriented leisure offer at Dockside and commercial leisure at Hempstead Valley, which responds directly to the changing market and is fast becoming the focal points for leisure uses. Rochester on the other hand, has a unique offer reflected by its historic setting. There is potential for the role of centres to evolve reflecting the character as set out below:
- **Chatham:** location for comparison retail, community uses and services, cultural & commercial leisure and tourism based uses in support of local heritage assets, developing its evening economy and benefitting from waterfront regeneration.
 - **Rochester:** continue as the location as a leisure destination focussed around the heritage assets.
 - **Rainham:** continue to support its local function
 - **Strood:** remains a convenience retail destination and satisfies a local function. Could potentially be supported by small scale employment – SME and start-up units

⁶⁹ Department for Communities and Local Government, 'National Planning Policy Framework', Section 2, paragraph 23, pg.7, 2015 Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁷⁰ GVA, 'Retail and commercial leisure assessment', North Kent SHENA, Nov 2016, Available at :
<https://www.medway.gov.uk/pdf/with%20Gravesham%20caveat%20NKSHENA%20Retail%20Vol%201%20Main%20Rept%20FINAL%20NOVEMBER%202016.pdf>

- **Gillingham:** should this become a student district centre with a focus on some small scale employment provision to collaborate more closely with the universities
- **Hempstead Valley Shopping Centre:** continue to perform a local function and high value shopping destination supported by commercial leisure

6.27 In revisiting the role of our centres to ensure sustainability in the longer term, key assets and characteristics will be identified and supported. This may involve the development of guidance for other centres, which are not the main city and district centres, such as Dockside.

Policy RTC5: Role, Function and management of uses in centres – Frontage

The council seeks to establish a robust, vital and viable retail core in support of competitive, sustainable and healthy centres compliant with its retail policies. A mix of uses is supported with due consideration of avoiding an overprovision or concentration of the same type of uses.

Primary Frontage

Proposals for non-A1 uses within the primary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy provided the provision of A3 uses do not result in an over concentration in Rochester District Centre.

Where the proposal results in the loss of A1 premises, permission will be granted where:

- i. it is consistent with the policy above.
- ii. in all other cases the unit has remained vacant for at least 6 months and the applicant can demonstrate:
 - reasonable⁷¹ attempts were made without success to let the premises for A1 use;
 - that the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy of the centre.

Greater efficiency in the use of upper floors will be supported and encouraged.

Secondary Frontage

Proposals for non-A1 uses within the secondary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy and where provision of A3 uses does not result in over provision in Rochester district centre.

Where the proposal results in the proportion of A1 representation falling below the threshold defined by the council and/or results in the loss of A1, A3, D2, community and cultural uses, permission will be granted where:

- reasonable⁶ attempts were made without success to let the premises for the last use

⁷¹ Advertised at least twice reflecting changes in adverts to demonstrate flexibility and capture retailer requirements

- the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy.

Question RTC10:

Do you agree that this proposed approach represents an effective approach to planning for the city and district centres in Medway?

Question RTC11:

Do you consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f above?

Question RTC12:

Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f above?

Question RTC13:

Do you consider that there are alternative approaches to manage this aspect of Medway's main centres?

Temporary uses

6.28 Temporary permissions with time specific restrictions can address long standing vacancies in centres. Temporary uses can also provide interest for visitors and therefore have value in stimulating footfall, creating a positive image and adding to the vitality of the High Street. However, the wider objective of securing uses more appropriate for the location is an overriding consideration.

Policy RTC6: Temporary uses

Proposals for a temporary use of vacant units within town and local centre frontages will be supported for a period of up to 6 months where compliant with the council's design and retail policies and:

- where the unit has been vacant for at least 2 months;
- where the proposed use makes a contribution to the vitality and viability of the centre;

Erection of structures for the operation of the business must be easily removable

Temporary permissions will only be renewed for a single additional period where:

- The original temporary permission was granted for a period of less than 4 months
- Reasonable attempts were made to let the premises without success
- The current temporary use can demonstrate benefit to the centre and success of business.

Question RTC14:

Do you agree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway?

Would you propose alternative approaches?

Supporting sustainable and healthy centres

- 6.29 Some types of retail uses have the potential for a problematic cumulative impact when there is an overconcentration in one place. Such specific uses can include places like betting shops; premises selling alcohol, particularly for consumption off the premises; some gaming centres with gambling machines, and some hot food takeaways or dessert restaurants, which tend to sell food high in fat and/or sugar. They can contribute to health issues and may undermine the attractiveness of the High Street. The council sees a robust retail offer as the core of successful town centres. The Local Plan also has a role in addressing health inequalities in Medway. Together these indicate that policy should seek to manage the range and location of particular businesses, as part of wider initiatives to promote public health and wellbeing and secure the vitality of town centres.
- 6.30 The council considers that there are grounds to identify areas⁷² that are at risk of being placed under stress resulting from the cumulative impact of concentrations of specific premises. Evidence on the location and number of existing uses that may undermine the health of the High Street can provide guidance on where further premises of the same type should be restricted or managed. In preparing policy for the draft Local Plan, the council seeks views on how it should approach this matter.

RTC7: Supporting Sustainable and Healthy centres

Development proposals will help to create healthy and sustainable places⁷³, recognising the cumulative effect individual units and specific uses can have on the success of places.

The council will seek to manage the concentration and mix of specific premises to strengthen its centres and support healthier communities.

⁷² Cumulative Impact policy applicable to Gillingham, Chatham, Luton and Rochester. Stress areas identified.
<https://democracy.medway.gov.uk/mgConvert2PDF.aspx?ID=3440&T=10>

⁷³ Department for Communities and Local Government, 'National Planning Policy Framework', Section 2, paragraph 23, pg.7, 2015 Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Question RTC15:

Do you agree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area?

Question RTC16:

The council considers such specific uses to include ‘high energy density food’ outlets, which sell foods high in fat and/or sugar; betting shops; gaming centres; and premises selling alcohol, particularly for off licence sales. Do you agree with this definition? Do you think that the list should be amended?

Question RTC17:

Do you think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above?

Question RTC18:

Do you think that such uses should be restricted near schools and youth facilities?

Question RTC19:

Do you think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis?

Hempstead Valley Shopping Centre

- 6.31 Hempstead Valley district centre is unique amongst the Medway centres in that it comprises, in its entirety, a purpose-built indoor shopping centre. Although a district centre in retailing terms, the relative shortage of non-retail facilities means that Hempstead Valley functions in a different way to the ‘traditional’ district centres of Strood, Gillingham and Rainham. There is ample free surface level car parking and has advantages over the ‘traditional’ town centres in Medway that expansion / reconfiguration is much easier for modern stores. It has seen stronger levels of market interest in recent years from retailers wishing to expand in this location.
- 6.32 Hempstead Valley shopping Centre is a healthy centre and has seen more proposals for expansion with a particular focus on commercial leisure uses. The North Kent retail study recommended a need for modernisation and provision of service oriented uses. The study concluded that there was no qualitative need for additional comparison and convenience retail provision. It also raised concerns over the potential for additional space to have a detrimental impact upon Chatham town centre. It is likely that Hempstead Valley Shopping Centre has the highest convenience goods turnover and is second to Chatham in having the highest comparison goods turnover. Therefore, whilst the shopping centre does provide a focus for the population living in the southern part of Medway and also helps to retain

shopping trips, there is strong case for a policy approach which manages how Hempstead Valley evolves over the life of the Plan in order to protect other town centres. It is considered that a criteria based approach to assessing retail and leisure development within the centre boundary would provide a sound approach. There are also potentially conflicting considerations on how best to manage the role of Hempstead Valley, given the draw of Bluewater on Medway's retail spend.

RTC8: Hempstead Valley District Centre

Hempstead Valley is different to the other traditional centres with high streets. The council recognises that it provides for local needs and therefore supports the modernisation and growth of this where supportive of this local function.

Further retail and leisure development, appropriate to the character and role of the centre will be supported, following a sequential or impact test, where it can be demonstrated that it does not undermine the viability of main town centres in Medway.

Question RTC20:

Do you consider this is the appropriate approach to planning for Hempstead Valley shopping centre?

Question RTC21:

Do you think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway?

Question RTC22:

Do you support a policy approach that seeks to achieve a balance of uses across all centres in Medway?

Dockside

6.33 Dockside Outlet Centre contains 'outlet' stores (generally selling discounted/past season stock) from a range of national multiple retailers. The main 'anchor' to the centre is a Marks & Spencer Outlet store, and there is a mix of operators. The centre also contains number of food outlets. Immediately adjacent to the Dockside Outlet Centre is a cluster of leisure and tourism uses, including an eight-screen cinema, and a number of family dining restaurants. These uses are also complemented by a nearby hotel. There is no cinema located in any of the town or district centres in Medway, and relatively limited representation from national commercial leisure operators. Therefore Chatham Dockside represents the principle 'hub' for this type of activity in Medway with the exception of Medway Valley Leisure Park. The Dockside area focuses as a distinct cluster of retail and commercial leisure activity, attracting both visitors and local residents.

- 6.34 This area has grown over the years and is evolving and responding to the changing market conditions. The Universities at Medway campus is close by, and there are a number of commercial buildings in the area. The substantial growth in and around Chatham Maritime and Gillingham Pier and future plans for development also has an influence in considering the role of this area as part of the plan's strategy. Consideration is given to its role as a family leisure destination, and the future role it could play to sustainably provide for local needs in this area.
- 6.35 The council recognises the role of Dockside as a family leisure destination, and will protect this function in the new Local Plan. It is collating further evidence to assess the appropriate future role of Dockside, and in consulting on this plan, is seeking views on what form and scale of further development would be suitable for the area.

Question RTC23:

Do you support a policy approach that recognises the family leisure role of Dockside?

Question RTC24:

What do you think is the appropriate approach to further growth? Should policy only allow a small amount of new 'convenience' retail, or support a wider range of services and shops to develop its role as a local centre?

Medway Valley Leisure Park

- 6.36 Medway Valley Leisure Park is another leisure destination within Medway with a cinema and contains a bowling rink, restaurants and hotel. There is limited potential for further expansion of this offer in this location. In addition, the retail strategy is to direct leisure to centre locations to support cultural assets and tourism as well the evening economy. It is therefore important that this area is managed appropriately.

Policy RTC9: Medway Valley Leisure Park

Medway Valley Leisure Park is a family leisure destination that attracts visitors and residents in the area.

The council's retail policy directs all leisure uses firstly to Medway's centres. Development proposals will be supported where enhancing current provision without requiring expansion beyond the designated boundary, subject to compliance with the council's retail policies:

- satisfying that no sequentially preferable sites were found;
- that the impact assessment has been satisfied where triggered

Question RTC25:

Do you consider that this is an appropriate approach to planning for Medway Valley Leisure Park?

Question RTC26:

Do you think that there should be a specific policy to manage the development of Medway Valley Leisure Park, or if proposals should only be determined by use of wider retail policies?

Local centres

- 6.37 National guidance recognises the importance of providing local shops to satisfy the needs of local communities. Local planning authorities are required to plan positively for local shops to enhance the sustainability of communities and guard against unnecessary loss of valued facilities and services. Local centres play an important role in creating the aspirations for a high quality built environment and strong, vibrant and healthy communities⁷⁴. It is necessary to support sustainable living patterns and smaller centres play a bigger role in rural areas. The council recognises the key role of services in villages, and the higher dependency of rural residents on local services. Smaller centres are a meeting place and support community cohesion. Support and protection of these centres are therefore vital to support the day to day activities of residents and the sustainability of settlements and communities⁷⁵.
- 6.38 At the heart of the policy approach is the aim to support a sustainable way of living. Officers are reviewing centres to determine the current condition of all centres in Medway. The assessment will confirm which could be designated as local centres and where boundary reviews are required to reflect changes. The next version of the draft Local Plan will provide a list of centres with proposed boundary changes.

Policy RTC10: Healthy sustainable communities

The council will support the provision of services and facilities, in accessible locations, to support the day-to-day activities of residents in a sustainable manner. Considerations of sustainability will include the offer (balance of retail, community uses and services), and accessibility - the mode of travel and distance.

The council recognises the importance of local services in villages as critical to sustainable rural communities.

Question RTC27:

Do you agree with this proposed approach to sustainable communities?

What alternative approaches would you suggest?

⁷⁴ Department for Communities and Local Government, 'National Planning Policy Framework', Section 2,8,11, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁷⁵ *ibid* 74

- 6.39 Local, village and neighbourhood centres play a local role and as such should not contain uses of large scale, form or massing. The scale of provision should be appropriate to the location and the function for local services. Cinemas, drive through restaurants, concert halls etc. are therefore not appropriate for smaller centres. Smaller centres are fundamentally based on their retailing role, but also perform a community function.

RTC11: Local Centres and shopping parades

Uses within a defined local centre or smaller shopping parades must be appropriate to the scale, character and role of the centre or parade, be compliant with the council's retail policies and include the following uses to support the core function:

- Convenience retail offer to provide top up shopping
- Community uses (such as hall, library, notice board)
- Services (such as hairdressers, cash machines)
- provide convenience for local communities (allowing various activities to be undertaken)

Proposals resulting in the loss of the core uses listed above will be permitted in local centres and shopping parades where in compliance with the council's retail policies:

- it is demonstrated that the loss is mitigated by similar uses of community value in close proximity;
- it is demonstrated that the proposed use would make a positive contribution to the vitality and viability and balance of uses in the centre and is of appropriate scale and character;
- the unit has remained vacant for at least 6 months and can be demonstrated that reasonable attempts have been made, without success, to let or sell the premises for a shop or community use.

Question RTC28:

Do you consider that this is the appropriate approach to planning for small retail areas?

Do you think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis?

Retail Warehousing

- 6.40 The NPPF makes clear that proposals for new main town centre uses, including retail, should be located by preference within or on the edge of town centres. It also advises local authorities to set policies for the consideration of proposals which cannot be accommodated in such locations. Retail parks form part of this bigger picture and can provide a supportive role to centres if located in appropriate locations

and the uses are managed to address potential conflict or impact on neighbouring centres.

- 6.41 Retail parks have traditionally had specific characteristics based around the type of uses, the format and scale of provision, the location, access and parking requirements. However, time has moved on and so has national guidance. Whilst provision in all parks remains predominantly large scale at present and broadly consistent with the traditional retail park characteristics, recent planning permissions have resulted in the provision of smaller units and uses considered complementary such as cafes and hot food takeaways/restaurants. This appears to be a wider national trend.
- 6.42 'Gillingham Retail Park' demonstrates characteristics of a retail park following a complicated history. It now has occupation of units by high street convenience and comparison retailers, and is therefore not wholly compliant with the criteria consistent with the traditional retail park. Recent planning applications have also seen a rise in proposals for further open A1 planning applications and the identification of uses that would be better suited to a town centre location.
- 6.43 The North Kent Retail Study found the retail locations outside of Gillingham District Centre are performing much better than the district centre itself. This includes retail provision in 'Gillingham Retail Park' and the nearby Tesco Extra store. Links between the vulnerability and health of Gillingham District Centre and the well performing Gillingham Retail Park and accompanying Tesco Store on Courtney Road were drawn in the study. A similar trend was noted in Strood, i.e. Strood Retail Park was performing better than the district centre.
- 6.44 A better definition of function and role is required to manage the impact on centres. The policy approach will seek to define retail warehouse areas and specify appropriate uses reflecting the current and emerging trends.

Policy RTC12: Retail Parks

Retail proposals will be permitted in defined retail parks (Strood Retail Park, Horsted Park, Gillingham Retail Park) appropriate to their character where the following criteria are satisfied:

- Provision of suitable access, parking or parking arrangements;
- It is demonstrated that no locations in-centres are available where uses are typical of and more appropriate for a town centre location;
- It is demonstrated satisfaction of an impact assessment that there will be no impact on centres, with particular attention to vitality, viability, vibrancy and sustainability of the existing centres and their vulnerabilities
- No significant impact on the transport network and parking in the surrounding area
- Good public realm and linkage to the neighbouring centre is provided assisting in linked trips and increasing dwell time in the neighbouring centre.

An impact and sequential assessment for non-minor retail (above 2,500sqm) will be required to take account of the cumulative impact of recent significant proposals.

Where appropriate the council will require:

- conditions or legal agreements will be required to manage impact on centres, including a condition on the type and range of goods.
- Public realm works to facilitate better linkage with the centre.

Question RTC29:

Do you consider that this is a effective approach to planning for retail parks?

Would you suggest alternative policies for planning of development in retail parks?

SECTION 7

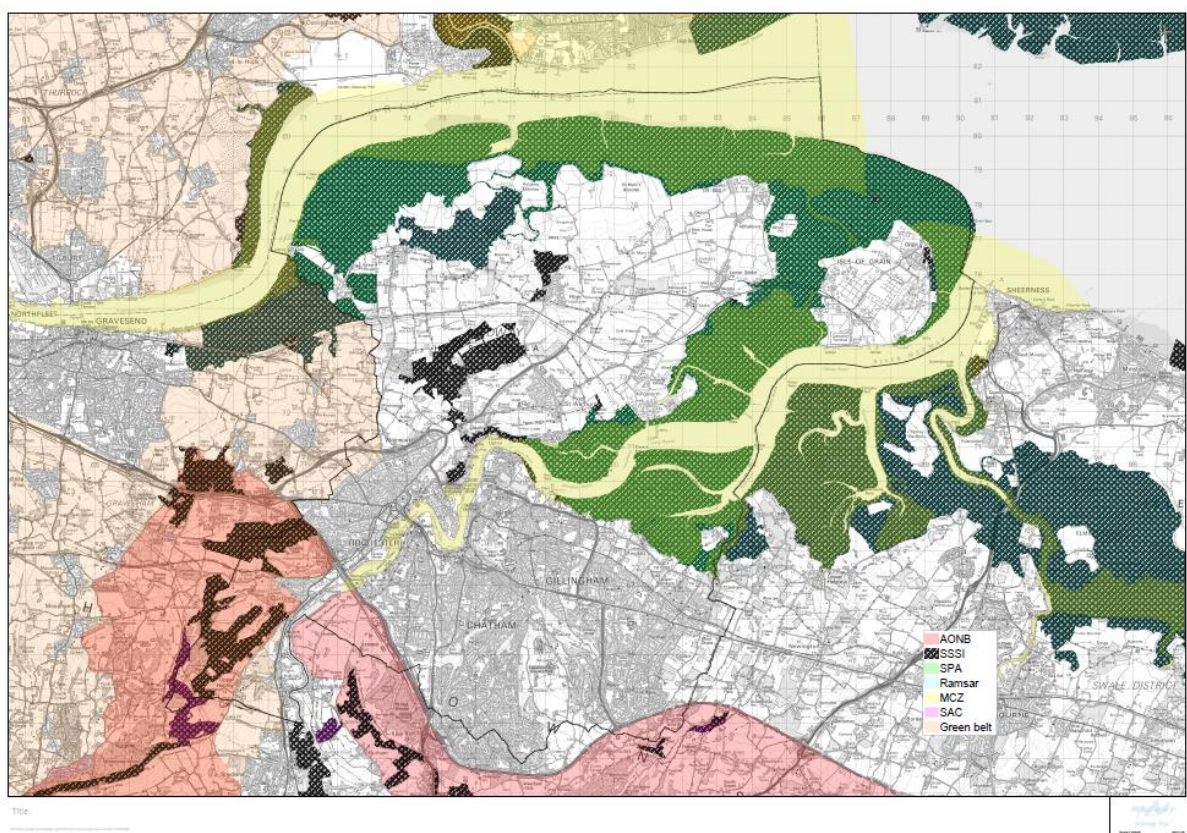
NATURAL ENVIRONMENT AND GREEN BELT

- 7.1 Government policy⁷⁶ recognises that a key purpose of the planning system is to contribute to the conservation and enhancement of the natural and local environment. The council's vision and strategic objectives for the Local Plan place a healthy and attractive environment at the heart of its ambitions for Medway in 2035.
- 7.2 Although known by many as an urban conurbation, Medway has a distinctive and diverse rural area and coast, including expansive estuarine and marshland landscapes, the wooded slopes of the Kent Downs, and productive farmland. In a number of locations, the developed area abuts land designated for its environmental importance. This proximity can sometimes create issues for sustainable land management, and result in development pressures. Congestion around key transport corridors has resulted in raised levels of pollution and four Air Quality Management Areas have been designated to address the problem. Medway's industrial past has left many sites contaminated from previous uses. A number of these brownfield sites now represent regeneration opportunities promoted in Medway's development strategy approach. The area's relationship with the rivers and estuaries that define Medway's character and history gives rise to specific consideration for sustainable water management and addressing the risk of flooding.
- 7.3 The area's environmental quality is of international and national importance with 28% designated as a Special Protection Area (SPA) or Ramsar site, and a third of the land area is designated as Sites of Special Scientific Interest (SSSI). Most of the designated land is in favourable condition, but some areas are in unfavourable condition, largely resulting from land management practices. There have been noted declines in the birdlife of the estuaries. Although there may be various contributing factors, particular concerns have been raised about the impacts of recreational disturbance on the special features of these areas. There are designations of Special Areas of Conservation (SAC) of international importance, both within Medway, and in close proximity to its borders. There is potential of damage to the features of designated SACs from air pollution generated in association with development proposed in the Medway Local Plan. There are further sites recognised as Regionally Important Geological and Geomorphological Sites, Local Nature Reserves and Sites of Nature Conservation Interest.
- 7.4 Medway's environment also includes land in the Kent Downs Area of Outstanding Natural Beauty (AONB). The RSPB has its oldest heronry/nature reserve at Northward Hill, and Plantlife has its largest reserve at Ranscombe Farm. The natural features of the river and the Downs are reflected in the city's character and form. These include the Capstone and Horsted Valleys and Darland Banks. The urban area benefits from a diverse and attractive mix of parks, including district scale facilities at Riverside, Capstone and the Great Lines. The council's approach to the

⁷⁶ Department for Communities and Local Government, 'National Planning Policy Framework', Section 11, paragraph 109-125, pg.17, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

conservation and enhancement of the natural environment will embed green infrastructure planning in both rural and urban areas and promote improved connectivity and functionality, following a 'natural capital' approach as promoted by government. Understanding and embracing Green Infrastructure functionality will assist Medway in delivering improvements in urban air quality, sustainable drainage, biodiversity, rich open spaces and safer access routes, and in securing sustainable developments both within its spatial options and urban areas. The new Local Plan will seek to strengthen the condition of the local environment, and respect the need to live within the earth's environmental limits.

- 7.5 Consultation on the emerging Medway Local Plan has confirmed how green spaces and countryside are valued by local people. There is much support for their protection and enhancing their functions for access and wildlife, with particular interest in extending access to the riverside that is appropriate to the sensitivities of the natural environment. The consultation on the Development Options stage of the emerging Local Plan in 2017, received over 11,000 representations objecting to the consideration of development taking place on land designated as a SSSI at Lodge Hill.
- 7.6 A key feature of Medway is the extent of areas that are designated of international or national importance for their biodiversity and landscape value. These indicate areas where development should be restricted in order to protect their special characteristics as outlined above.



Environmental and Green Belt Designations in Medway

- 7.7 National planning policy⁷⁷ sets the requirements for the planning system to contribute to and enhance the natural and local environment. It recognises the importance of natural assets, including air, water and soils, landscapes, biodiversity and the connectivity between them. The government published its 25 Year Environment Plan⁷⁸ in early 2018 to provide guidance on its new approach to managing the environment. The plan promotes a 'natural capital' approach that recognises the wider value of the environment and its contribution, such as food, clean water and air, wildlife, energy, wood, recreation and protection from hazards. In using land sustainably, the Local Plan commits to embedding an environmental net gain principle for development and infrastructure. It supports locally-led strategies to enhance the natural environment. The council will embed these principles in the Local Plan as it develops.

Rivers and Estuaries

- 7.8 The lower reaches of the river Medway flow alongside the villages and towns of the borough, opening up into the estuary which separates the Hoo Peninsula from the largely urban area to the south. The Thames forms Medway's northern boundary. The rivers and estuaries and associated habitats are intrinsic to Medway's character, and have influenced the area's history and development. The use of the water for trade continues with wharves, docks and associated infrastructure supporting the supply of minerals, energy and wider goods and services. The urban waterfront is a focus for Medway's regeneration ambitions, with key development sites from the south of Strood to the north of Gillingham. Strategic employment sites are located on the coast of the Hoo Peninsula, notably at Kingsnorth and Grain. The Marine Conservation Zone, SPA and SSSI designations adjoin many of these key regeneration and employment sites. Policies for managing these important water resources have been developed through the Thames River Basin Management Plan and the emerging Medway Estuary and Swale Strategy⁷⁹. Biodiversity Opportunity Areas (BOAs) have emerged from the Kent Biodiversity Strategy to indicate where targets should be focused in order to secure the maximum benefits for biodiversity. The North Kent Marshes are a key opportunity area.
- 7.9 The routes around the Medway and Thames form part of Natural England's England coastal path that will be in place by 2020. Further details of the route along Medway's coast will be published by summer 2018. The Saxon Shore Way long distance path enables walkers to explore the area's historic shoreline. The North Downs Way national trail runs through Medway, and is a focus of development work

⁷⁷ Department for Communities and Local Government, 'National Planning Policy Framework', Section 11, paragraph 109, pg.17, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁷⁸ HM Government, 'A Green future: Our 25 year plan to Improve the Environment', Available at :

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

⁷⁹ Environment agency, 'Medway Estuary and Swale flood and coastal risk management strategy', Available at, <https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy>

supported by the Kent Downs AONB unit. There are wider opportunities to open up access through the urban area, through a waterside path or boardwalk, which will be promoted through detailed plans for Medway's regeneration and development. This will be an iconic project that could transform the area's urban waterfront and connections. Similarly ambitions to provide a riverside link for walking and cycling between Medway and Maidstone will be supported. The new river crossing south of Halling has opened up opportunities for walking and cycling routes embracing both sides of the Medway valley. The council is updating the Medway Rights of Way Improvement Plan for publication in late 2018.

- 7.10 Much of the Thames and Medway estuaries and bordering mudflats and marshes are designated as Special Protection Areas and Ramsar sites for their international importance for wintering birds, and also have status as Sites of Special Scientific Interest. The collaborative Strategic Access Management and Monitoring Strategy (SAMMS) scheme has been developed by environmental groups and local planning authorities to ensure residential developments can come forward without increasing further the disturbance of over wintering wetland bird populations. The Medway Estuary from Rochester to the Isle of Grain was designated as a Marine Conservation Zone (MCZ) in the first round of designations in 2013. This protects a nationally scarce species of tentacled lagoon-worm and a number of habitats and their associated wildlife. The health of the MCZ will largely be achieved through the licensing regimes that manage activities taking place on the river or seabed, but the council as local planning authority must consider the potential impact of developments proposed along the coast. The Marine Management Organisation is preparing a marine plan for the south east that will provide guidance on managing development and activities.
- 7.11 The council recognises tensions between opening up access to the coast and the needs of wildlife. Research⁸⁰ has shown that the internationally important birdlife of the Thames, Medway and Swale Estuaries Special Protection Areas and Ramsar sites can be damaged by the impact of people visiting the estuary. Dogs exercising off the lead, cycling and watersports are among the activities shown to cause disturbance to birds, and so a potential contributing factor to the decline of birds in the estuary. Medway Council is working at a landscape level, leading a North Kent SAMMS Project Board, to coordinate the delivery of a strategic package of measures to address the potential of damage to the special features of the designated habitats. The strategic approach is funded through a contribution from new developments which would increase the population within 6km of the protected areas, which the research found to be the distance within which most visits to the estuarine coast originated. Monitoring is embedded in the SAMMS scheme, so that measures can be adapted to take account of changing conditions.
- 7.12 Medway Council adopted an interim Policy Statement⁸¹ in November 2015 to provide a basis for its implementation of the Strategic Access Management and Monitoring

⁸⁰ Foot print-Ecology, '*Bird Disturbance Study North Kent*', 2010/2011, (FOOTPRINT-ECOLOGY.CO.UK), Available at: <http://www.medway.gov.uk/pdf/Final%20North%20Kent%20Bird%20Report.pdf>

⁸¹ Footprint- Ecology, '*Thames, Medway & Swale Estuaries- Strategic Access Management and Monitoring Strategy*', 2014, (FOOTPRINT-ECOLOGY.CO.UK), Available at:

programme⁸². It is the council's intention that the new Local Plan will include a policy on this matter to seek to avoid damage to the protected characteristics of the Thames, Medway and Swale SPA and Ramsar sites.

Policy NE 1: Sites of international importance for nature conservation

The estuaries and marshes of the Thames, Medway and Swale are designated Special Protection Areas (SPAs) and Ramsar sites in recognition of their international importance as wetland habitats. There is a Special Area of Conservation in the North Downs woodland near north Halling. These sites require the highest level of protection from development that could damage the features of the designated areas. No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site, alone or in combination with other plans or projects, as it would not be in accordance with the Habitat Regulations 2010 (as amended) and the aims and objectives of this emerging Local Plan.

The council will work in collaboration with local planning authorities in north Kent to contribute to the delivery of a strategic access management and monitoring scheme to address potential damage from population increases on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

Development within 6km of these areas designated as the Special Protection Areas and Ramsar sites that has the potential to generate additional visits to these coastal areas will be required to make a defined tariff contribution to a strategic package of measures agreed by the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) Project Board.

The council will consider the potential for adverse impacts on the Special Areas of Conservation arising from development, either alone or in combination with other plans and projects. If the assessment shows that there is a potential for adverse impacts, steps will be taken to restrict or mitigate development.

Consideration of Alternatives

- 7.13 In preparing the interim policy position on SAMMS, the council considered alternative approaches⁸³, involving review of the extent of the buffer zone, the package of measures that could address the potential impact on the SPA/Ramsar sites, and the option to assess impacts through producing an Appropriate Assessment at individual planning application level. The proposed approach was supported as it best responded to the evidence base and technical advice from Natural England.

<http://www.medway.gov.uk/planningandbuilding/localplansandpolicies/developmentplanpolicies/developmentbriefguidance/birddisturbanceinnorthkent.aspx>

⁸² *ibid* 81

⁸³ Strategic Access Management Scheme, Section 3.6-3.8,
<https://democracy.medway.gov.uk/mgconvert2pdf.aspx?id=28914>

Question NE1:

Do you consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats? What alternative approaches would you recommend to secure the favourable condition of these areas?

- 7.14 The environment is central to the ambitions for Medway's sustainable growth. The council recognises the challenges of accommodating the needs of the area's growing population alongside safeguarding the special characteristics of the local environment. The Local Plan will set out the council's commitment to protecting biodiversity, valued landscapes and geological conservation interests. The council will prepare detailed policies to secure the area's network of ecological and landscape features in producing the draft Local Plan.

Policy NE2: Conservation and Enhancement of the Natural Environment

The council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy NE1, Medway includes Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites and a Marine Conservation Zone.

The council will promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.

Question NE2:

Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment?

What alternative approaches would you recommend to secure the favourable condition of these areas?

Kent Downs Area of Outstanding Natural Beauty

- 7.15 The Kent Downs to the south of Medway are part of an Area of Outstanding Natural Beauty (AONB) designation that runs across the county from Downe to Dover, and celebrate their 50th year of designation in 2018. This is an exceptional landscape and the area is afforded the highest status of protection in relation to landscape and scenic beauty. Medway Council is a member of the Kent Downs Joint Advisory Committee that coordinates actions to conserve and enhance the natural beauty of the AONB. The council has adopted the Kent Downs AONB management plan, 2014-2019⁸⁴ in line with statutory requirements, with the purpose of securing and

⁸⁴ Kent Downs, 'Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019', Available at: http://www.kentdowns.org.uk/uploads/documents/KD_AONB_final_plan_09.09.14.compressed.pdf

strengthening the distinctive qualities and features of the AONB, within the context of development and wider changes across Kent and Medway. Medway's only Special Area of Conservation (SAC) falls within the ancient woodland in the Kent Downs near Upper Halling, as a small part of the North Downs Woodland SAC.

- 7.16 Medway's part of the Kent Downs AONB is dissected by the river. The area is characterised by the lower valley sides and scarp of the Medway Valley, and provides an important rural buffer between the urban areas of Medway and Maidstone and Malling to the south. There are rich layers of history, and the area includes pre-historical sites and is marked by its industrial past. The M2 and CTRL rail bridges sit high at the northern end of the valley. The open views and dominant landform of the area make it a highly sensitive landscape, and therefore stressing the importance of its setting. Its sensitivity is increased by its role in the setting of the Medway Valley; its function as a gap between large settlements; the inherent value of its cultural and biodiversity sites, and its remarkable survival as a peaceful, rural landscape despite its proximity to settlements, industry and transport infrastructure. Connecting countryside close to the Kent Downs AONB, in areas such as Capstone Valley, reflect features of the designated landscape.
- 7.17 The area experiences some pressures from changing patterns of development in the wider area and infrastructure. The Lower Thames Crossing may impact on the AONB. The area has been subject to some anti-social behaviour, including illegal access, and poor land management regimes. The Valley of Visions partnership invested in a programme to celebrate and enhance the landscape, which has had ongoing benefits, such as tackling illegal use of off-road vehicles.
- 7.18 In considering proposals for development affecting the Kent Downs AONB, both within the designated area and its setting, regard will be given to the components of natural beauty, including tranquillity and cumulative impacts. The setting of the AONB is particularly significant.

Policy NE3: Kent Downs Area of Outstanding Natural Beauty

Development proposals in the Kent Downs AONB and in the setting of the downs will be required to contribute to the conservation and enhancement of the natural beauty of this designated landscape.

Development must demonstrate that it has have regard to the Kent Downs Management Plan and associated policy guidance.

Question NE3:

Do you consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB?

What alternative approaches would you recommend to secure the components of natural beauty?

Landscape

- 7.19 Medway benefits from a diverse range of landscapes. Areas such as the Kent Downs and North Kent marshes are protected by environmental designations. However the council recognises the importance of wider landscapes in providing local character, retaining links to the historic environment and defining distinct settlements. The council is updating the Medway Landscape Character Assessment produced in 2011, to provide a robust basis for landscape planning in rural and peri-urban locations. This will provide guidance to inform the preferred development strategy for the new Local Plan. It will also inform requirements for areas to be designated for their strategic landscape importance, including preventing coalescence and securing the quality and functions of the local landscape. Further guidance will be established in the Green Infrastructure Framework.

Policy NE4: Landscape

The council attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, containing urban sprawl and separation of settlements.

An updated Medway Landscape Character Assessment and Green Infrastructure Framework will provide a basis for determining the acceptability of development proposals and areas and features that need to be protected and enhanced.

Development proposals will be required to demonstrate that they protect, strengthen and connect features of local landscapes.

Question NE4:

Do you consider that this is an effective approach to landscape policy in Medway?

What alternative approaches would you recommend?

Medway's green infrastructure network

- 7.20 The large urban conurbation made up of the distinct Medway towns is surrounded and interspersed by countryside and water. The parks, paths and open spaces across urban Medway are important to residents for relaxation, health, socialising, and contribute to the quality of towns and suburbs. These can be the most direct way for people to engage with their local environment and can contribute to tackling social isolation, inactivity and wider health issues. In contrast to the city landscapes, the rural parts of Medway are noted for expansive marshes, stretches of undeveloped coast, woodland, chalk downland, orchards and shelterbelts, and a range of other farming activities. Capstone and Horsted Valleys bring an accessible rural landscape into the heart of Gillingham and Chatham. The orchards running along the northern bank of the estuary provide an attractive and productive belt separating Rainham from Gillingham. Orchards to the east of Rainham provide a rural character and sympathetic setting for the Conservation Area at Meresborough

and a strategic gap between urban Medway and settlements in neighbouring Swale. Together these urban and rural assets make up Medway's green infrastructure network that provides a number of landscape services, and multiple benefits for nature and people. These include:

- Habitats for wildlife;
- Food production;
- Water storage and filtration;
- Air quality
- Setting for heritage
- Woodland for timber, fuel and as a carbon sink;
- Access to open space to relax, exercise and learn;
- Defining a local sense of place; and
- A focus for community activities.

7.21 A well planned and managed GI network can and should perform multiple functions and provide multiple benefits and services for communities such as,

- managing surface water and flood risk (flood storage, swales, surfaces for infiltration and storage)
- improving water quality
- helping communities to address and adapt to climate change
- providing opportunities for recreation and improved wellbeing
- enhancing biodiversity (Habitat creation, river corridors)
- promoting community interaction (recreation, boating, angling)

7.22 GI is an interconnected network of green and blue spaces such as: green roofs, parks and gardens, playing fields and allotments, beaches, watercourses and wetlands, river corridors, woodlands, grasslands, trees, hedgerows. GI should perform multiple functions and provide multiple benefits and services to communities, as detailed above. GI can include both private (such as home gardens) and public (such as local parks), managed (such as playing fields) and natural (such as woodland) spaces and is important in both urban and rural areas.

7.23 GI can be described as being a part of the wider network of services that form Environmental Infrastructure. These networks of services are essential to supporting and safeguarding our homes and communities: managing our water supply, waste water, waste services and providing flood risk management.

7.24 Green spaces and countryside help in regulating the resilience of the environment at a local and global scale. The council will work at a landscape scale to conserve biodiversity and secure the wider benefits of a coordinated approach to planning for the protection and enhancement of Medway's natural and local environment. Green infrastructure planning will inform the development strategy and principles promoted in the new Local Plan. This accords with the ambitions and approaches in planning for the natural environment set out in the government's 25 Year Environment Plan.

7.25 The principles underpinning green infrastructure planning in Medway are:

- Positively reinforcing a sense of place
- Separating places but joining communities
- Delivering clear benefits for the environment through development to ensure all communities benefit from change
- Providing richer experiences
- Creating more accessible urban and rural places
- Getting closer to nature
- Ability to move through productive landscapes
- Embedding sustainable thinking from the global to the local scale

7.26 Working at a landscape scale, a green infrastructure network of parks and paths, watercourses, and farmed, forested and natural environments will seek to embed connectivity for people and wildlife. These will form a Green Grid for Medway, which will be detailed in a Green Infrastructure Framework to be published in support of the draft Local Plan, informed by preferred sites and broad locations for development. Key components of green infrastructure planning will include strategic green infrastructure zones in areas facing development to provide for sustainable development and provide robust landscape features to enhance planned growth. Planning at this strategic scale provides an opportunity to deliver these multi-functional green infrastructure zones.

Policy NE5: Securing strong Green Infrastructure

The council will protect the network of green infrastructure across rural and urban Medway. The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a Special Protection Area, Ramsar site and/or Special Area of Conservation. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland. The council will consider the need to protect the special features of Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves

Wider components of the green infrastructure network will be protected in line with the analysis and strategy set out in the emerging Green Infrastructure Framework. This will include open space assets, landscape buffers and green infrastructure zones.

New development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.

The council will expect development proposals to demonstrate that they are designed to be resilient to, and can adapt to the future impacts of climate change, in strengthening ecological networks.

The council will promote the extension of the green infrastructure network through setting criteria for the establishment and maintenance of Local Green Spaces.

Opportunities will be sought to promote and enhance the public rights of way network, including footpaths, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside.

Question NE5:

Do you consider that this is an effective approach to securing effective and healthy green infrastructure in Medway?

What alternative approaches would you recommend to secure effective and healthy green infrastructure in Medway?

Green Belt

- 7.27 Green Belt is not a formal environmental designation, as its primary purpose is to prevent urban sprawl by keeping land permanently open. The council attaches great importance to the function provided by the Metropolitan Green Belt that covers areas to the west of Medway. The designation has retained a strategic gap between Strood and Gravesend and prevented the coalescence of Strood and Higham. As part of the preparation of the Local Plan the council has reviewed the Green Belt to assess if land is meeting the purposes established in national policy. Given the scale of growth projected in Medway's population, the council is giving broad consideration to all realistic options at this stage of the plan preparation. This includes testing if the exceptional circumstances exist that would justify a revision to the Green Belt boundary in Medway.
- 7.28 Should the council determine that there are no such exceptional circumstances to support the release of Green Belt land, it will adhere to its policy that development will be restricted in this location, in line with national policy to ensure that the land remains permanently open.

Policy NE6: Green Belt

The council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt⁸⁵ and can demonstrate that it would not undermine the functioning of the Green Belt.

The council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

⁸⁵ Department for Communities and Local Government, 'National Planning Policy Framework', Section 9, paragraph 89, pg.17, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Question NE6:

Do you agree with the proposed policy for Green Belt?

Do you consider that the exceptional circumstances exist to justify the review of the Green Belt boundary?

Do you have suggestions for alternative approaches to Green Belt policy?

Flood and Water Management

7.29 National Planning Policy expects Local Plans to account for water management via the consideration of flood risk, coastal change and water supply. This section will focus on the management of those aspects. Water supply is referenced in Section 10: Infrastructure.

7.30 'Flood risk' is defined in national Planning Practice Guidance (PPG) as "a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources."⁸⁶ National planning policy seeks to minimise increased vulnerability to flood risk through the promotion of sites away from areas of higher flood risk via a Sequential Test.⁸⁷ Where this is not possible then the Exception Test should be applied.

Flood risk in Medway

7.31 The Thames and Medway estuaries to the north and the River Medway bisecting the administrative area give rise to the risk of river and sea flooding. There is also substantial risk of surface water flooding throughout the administrative area. During the Preliminary Flood Risk Assessment process of 2011, urban areas within Medway were identified to be one of ten national Flood Risk Areas considered to be of significant risk of surface water flooding. This area is expected to have increased as part of the 2017 iteration of this assessment (outputs unavailable at this time). The Environment Agency's (EA) Long Term Flood Risk Map shows areas at risk of all sources of flooding, including from the rivers and sea, surface water, and reservoirs <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

Flood risk governance

7.32 The Environment Agency is responsible for taking a strategic overview of the management of all sources of flooding and coastal erosion. Lead Local Flood

⁸⁶ Department for Communities and Local Government, 'National Planning Policy Framework', Section 11, paragraph 109-125, pg.17, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁸⁷ Department for Communities and Local Government, 'National Planning Policy Framework', Section 10, paragraph 99, pg.17, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Authorities have a lead role in managing the risk of flooding from surface water, groundwater, and ditches and streams. Medway Council, as a Unitary Authority, is considered a LLFA under the Flood and Water Management Act 2010. Internal Drainage Boards are independent public bodies for water level management in low lying areas. They work in partnership with other authorities to actively manage and reduce the risk of flooding. There are two IDB's within the Medway administrative area; the Lower Medway IDB, and the North Kent Marshes IDB. The Medway Estuary and Swale Strategy is being developed by the Environment Agency that will recommend sites for realigning the flood defences to provide inter-tidal habitat that will support SPA and SSSI features (as compensation for loss through predicted 'coastal squeeze'), as well as delivering habitat that might be useful for the delivery of River Basin Management Plan mitigation measures. The council recognises the potential for habitat creation, particularly if there are multiple benefits from these opportunities such as improved water management, flood risk management, public access and landscape enhancement in addition to the wildlife benefits.

Climate change

- 7.33 Due to climate change over the coming years the frequency of flooding events may change. It is expected that there will be milder and wetter winters and hotter and drier summers. This combined with increased demand from development requires a proactive approach to the management of these risks via the planning system.
- 7.34 National planning guidance on Flood and Coastal Change⁸⁸ references Strategic Flood Risk Assessment (SFRA) as a study to be carried out by local planning authorities to assess the risk to an area from flooding from all sources, now and in the future and to assess the impact that land use changes and development in the area will have on flood risk. This study was initially undertaken for Medway in 2006 and is currently being updated (due for completion later in 2018) to reflect changes in planning policy, governance, and use of the most up to date flood risk data.
- 7.35 Government guidance⁸⁹ states that LPA's should work with LLFA's to secure Local Plan policies compatible with the Local Flood Risk Management Strategy (LFRMS). The Medway LFRMS was adopted in 2015.
- 7.36 It is important to apply this policy in the context of both of these strategic documents to ensure that all links are made to the aims and objectives of these plans.

Water supply

- 7.37 Water supply is managed by Southern Water and Southeast Water in Medway. Southern Water is the main supplier

providing water to most of authority and South East Water supplying just Halling.⁹⁰ Medway is an area of water stress as identified by the Environment Agency.⁹¹

⁸⁸ Department for Communities and Local Government, 'National Planning Policy Framework', 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁸⁹ *ibid* 88

Groundwater protection

- 7.38 The protection of groundwater sources is also vital in order to maintain water supply. In Medway there are several groundwater sources that are predominantly in the urban area and Medway Valley.⁹² These are highlighted via the Environment Agency Ground Water Source Protection Zones that aim to protect the water quality of groundwater sources.
- 7.39 Reference should be made to the Environment Agency's Groundwater Protection guidance documents to ensure that any impact of development on groundwater quality in the area is managed appropriately.⁹³

Policy NE7: Flood and Water Management

The Local Plan will seek to reduce flood risk, promote water efficiency measures, and protect and enhance water quality through the following mechanisms:

Flood Risk Management

- Ensuring that development has a positive or nil impact on flood risk management interests
- Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.
- Where development benefits from an existing or proposed flood infrastructure, the development should contribute towards the capital costs and/or maintenance of these defences over the lifetime of the development.

Sustainable Urban Drainage

Development should enable or replicate natural ground and surface water flows and decreased surface water runoff, via the use of Sustainable urban Drainage systems (SUDS), utilising green infrastructure where possible and as guided by relevant national (and/or local standards) and guidance.

⁹⁰ 'Medway Infrastructure Position Statement (2017)', Available at: <https://www.medway.gov.uk/pdf/IPS%20Jan%202017.pdf>

⁹¹ Department for Environment, Food & Rural affairs, 'Environment Agency, Water Stressed Areas (2013)', Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf

⁹² Environment Agency, 'Groundwater Source Protection Zones', Available at: <http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=531500.0&y=181500.0&topic=groundwater&ep=map&scale=5&location=London,%20City%20of%20London&lang=en&layerGroups=default&distance=&textonly=off#x=574986&y=167313&lg=1,10,&scale=6>

⁹³ Environment Agency, 'Groundwater source protection zones', 2005, Available at: <https://www.gov.uk/government/publications/groundwater-source-protection-zones>

Where SuDs are provided, arrangements must be put in place for their management and maintenance over their full lifetime.

Water Supply

Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and it does not put at risk the ability to maintain a public water supply.

Water Quality

All new development should have regard to the actions and objectives of appropriate River Basin Management Plans (in Medway, this is the Thames River Basin District) in striving to protect and improve the quality of water bodies in and adjacent to the district, as well as ecology, geomorphology, and water quantity. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary.

Adaptation to Climate Change

Development will be required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures. These include:

- Incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment.
- Minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDs in accordance with (SuDs policy above).
- Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading.
- Seeking opportunities to make space for water and develop new blue infrastructure to accommodate climate change.
- Where possible watercourses and wetland features will be adequately buffered from development commensurate with the designation and/or ecological value of those features so that they can be safeguarded and managed sustainably in perpetuity.
- Provision for buffering, mitigating and extending habitats and green corridors to ensure that wildlife populations are more resilient for a changing climate.

Question NE7:

Do you agree with the proposed policy for flood and water management?

Do you have suggestions for alternative approaches for this policy area?

Land Contamination and Hazards

- 7.40 National planning policy⁹⁴ seeks to avoid unacceptable risks from pollution and land instability. Land contamination is a key consideration as it causes harm to the environment, has the potential to adversely affect human health, and unless dealt with appropriately, can inhibit the re-use of otherwise suitable brownfield sites.
- 7.41 Medway has a number of brownfield sites that were previously in industrial and/or military use, particularly in waterfront locations. These previously developed sites provide opportunities for regeneration, making the best use of land, boosting the supply of housing and contributing to the area's economic success. However the council recognises that some of these sites may be subject to contamination from previous uses.
- 7.42 The council expects that all potentially contaminated land⁹⁵ should be remediated prior to development and/or during construction to an appropriate level to its proposed use. Investigations and assessments of all sites situated on or in close proximity to potentially contaminated land will be required in conjunction with relevant development proposals. This will identify potential risks to human health and the environment and where relevant, inform remedial measures and future monitoring to mitigate and monitor the risk. All investigations should be carried out in accordance with established procedural guidelines.⁹⁶ Where a site is affected by contamination or land stability issues, responsibility for securing a safe development will rest with the developer and/or landowner⁹⁷.
- 7.43 The council will set out further policy details in the development management policies in the draft Local Plan to ensure that land contamination is dealt with appropriately and where necessary remediated to ensure that there are no negative impacts on human health, controlled waters or other relevant receptors.

Noise and light pollution

- 7.34 National planning policy⁹⁸ recognises that development can adversely affect health and quality of life, through unacceptable levels of noise and inappropriate lighting. There are potential wider impacts on wildlife and landscapes, particularly areas

⁹⁴ Department for Communities and Local Government, 'National Planning Policy Framework', Section 11, paragraph 120-122, pg.17, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁹⁵ Environmental protection act 1990 c.43, Section 11(a)

⁹⁶ BSI Standards Publication, 'Investigation of Potentially Contaminated Land – Code of Practice', BS 10175:2001, Available at: <http://bailey.persona-pi.com/Public-Inquiries/M4-Newport/C%20-%20Core%20Documents/12.%20Geology%20and%20Soils/12.2.13%20-%20BS10175%20Code%20of%20Practice%20for%20Investigation%20of%20Potentially%20Contaminated%20Sites%20%28inc.%202013%20Amendment%29.pdf>

⁹⁷ Department for Communities and Local Government, 'National Planning Policy Framework', Section 11, paragraph 120, pg.17, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁹⁸ Department for Communities and Local Government, 'National Planning Policy Framework', Section 11, paragraph 123-125, pg.17, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

valued for their tranquillity. Noise can significantly affect the quality of life of local people, and has associated health related impacts where there is exposure to elevated levels of environmental noise. Noise may come from a variety of sources, including road, rail and air traffic, industrial processes and recreational activities. Certain forms of development, for example residential development, can be particularly sensitive to noise and there are strict noise criteria which should be achieved if negative effects of exposure are to be avoided. The council advocates that noise management is considered as early as possible in the planning process as an integral part of development proposals.

- 7.35 The council will assess areas of tranquillity across Medway, as part of its evidence base on landscape and green infrastructure to support the draft Local Plan, and develop an appropriate policy response. The council recognises the contribution of tranquillity to conserving the qualities of the Kent Downs Area of Outstanding Natural Beauty, and the special character of the marshland landscapes of the Hoo Peninsula.

Air Quality

- 7.36 As well as a detrimental impact upon the natural environment, air pollution if unchecked will have an increasing impact on human health and quality of life. The new Local Plan will recognise that air quality is an important consideration when making decisions with regards to future developments, transport and pollution control issues.
- 7.37 Where an air quality objective is deemed to be breached, the local planning authority must declare an Air Quality Management Area and put in place an action plan in order to bring pollutant levels below the objective.
- 7.38 Medway has four AQMAs: Central Medway; Pier Road Gillingham; High Street, Rainham; and Four Elms, near Chattenden. The pollutant of significance is nitrogen dioxide, and is almost entirely due to traffic and traffic congestion. The council has a statutory duty to have an Air Quality Action Plan, which aims to improve air quality within these designated areas, as well as the borough in general.
- 7.39 The Medway Council Air Quality Action Plan 2015 (AQAP) was formally adopted in December 2015. Kent and Medway Air Quality Planning Guidance, 2016⁹⁹ has been prepared to set out the measures which will be taken to help reduce emissions which occur as a result of development proposals. It provides advice for the design and layout of schemes and potential mitigation measures. The guidance will apply across the whole borough in order to improve air quality and avoid worsening air quality in existing AQMAs, or resulting in the designation of further AQMAs.
- 7.40 Large, potentially polluting developments include those that generate a significant amount of vehicle movements (such as large out of town industrial, leisure, retail or office developments), industrial processing plants, power stations and incinerators. The impact of any proposals on ambient air quality will also be important where the

⁹⁹ Medway Council 'Kent and Medway Air Quality Planning Guidance 2016', Available at: <http://www.medway.gov.uk/pdf/Medway%27s%20Air%20Quality%20Planning%20Guidance.pdf>

development could in itself result in the designation of Air Quality Management Areas or conflict any Air Quality Action Plans declared by the Council. In appropriate circumstances, air quality impact studies through air dispersions modelling and appropriate modelling will be made legally binding through the use of planning conditions or planning obligations (S.106 agreements).

- 7.41 The use of renewable and alternative energy sources; and integrated transport strategies, will all help to improve air quality and also contributing to reducing CO2 emissions. However biomass burning can pose challenges to air quality. A shift towards more biomass burning in urban areas of Medway could have significant impacts on air quality and public health if only the potential climate change benefits are considered. There could be conflict with policies relating to energy, and therefore very careful consideration of the air quality impacts relating to proposed development of biomass burning will be required.

Policy NE 8: Air Quality

The council seeks to reduce exposure to areas of poor air quality, maintain areas of good air quality, and where possible improve air quality through restricting development or requiring acceptable and effective mitigation measures.

Proposed developments which have the potential to impact on air quality will be expected to be accompanied by air pollution impact assessments and mitigation measures, in accordance with local air quality guidance.

All proposals should take account of the Medway Council Air Quality Planning Guidance that sets out a screening checklist for major size development and proposed development within, or close to an AQMA. Depending on the scale of development, the council may require the submission of an Air Quality Assessment and/or an Emissions Mitigation Assessment.

The guidance also advocates mitigation measures for all development. Where mitigation is not integrated into a scheme, the council will require this through a planning condition(s). If on site mitigation is not possible, then the council may seek contribution to wider air quality mitigation measures through a planning obligation.

Question NE8:

Do you agree with the proposed policy for air quality?

Do you have suggestions for alternative approaches for this policy area?

SECTION 8

BUILT ENVIRONMENT

Promoting High Quality Design

- 8.1 New development should provide high quality homes, employment and other activities in support of sustainable development for the long term. High quality design and attractive environments are key components of good planning; encouraging investment and economic development in an area, supporting social inclusion and helping to create civic pride and community cohesion, along with providing and protecting an enduring built environment which people are proud of. Good design is therefore essential in achieving sustainable development and the objectives of this Plan.
- 8.2 National planning policy requires good design¹⁰⁰ as a key aspect of sustainable development. It directs local planning authorities to develop robust and comprehensive policies that set out the quality of development that will be expected for the area. In assessing applications, the Council will therefore expect a positive assessment against the 'Building for Life (BfL12) Standards'; a national standard for well-designed housing and neighbourhoods to achieve this objective.
- 8.3 The council's vision is for Medway to be a location of quality development and correspondingly high quality environments. This is key to fostering happier, healthier residents that are proud of their homes, towns and communities where they live. The council will also seek to create a destination of choice to support businesses and employment creation. The attractiveness of the Medway area (its public realm, appearance and offer) is fundamental in supporting and nurturing a stronger local economy. The council will seek to achieve its aims for Medway as a Dementia Friendly Community through consideration of accessible design principles in the public realm and new developments.
- 8.4 The scale and mix of growth proposed in the new Local Plan offers great opportunities to shape Medway's future success through excellent design that invests in place making, benefitting established places and creating attractive new development. The regeneration areas provide the basis for new and revitalised urban quarters, delivering the modern University waterfront city. Strategic allocations and sites in suburban and rural Medway will be required to realise the plan's ambitions for quality, attractive, sustainable development that respects the character of the surrounding landscapes and communities.
- 8.5 Whilst the style of building and its adaptability are important considerations, its setting is just as important. Good design that supports a high quality environment and offer will be promoted, and is a key aim of this Local Plan

¹⁰⁰ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 56, p.14, 2015 Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- 8.6 Medway has a distinct local character that is derived from its rich historic environment. This local character creates a unique sense of place that new development should strive to protect and enhance. In considering the design of new development, regard should be given to heritage assets, their settings, the wider historic environment and the appropriate use of local vernacular materials.
- 8.7 The natural environment and well-designed open spaces play an integral role in creating a successful place. The role of the existing topography and other natural features worthy of retention within the site should be considered alongside landscaping from the outset of the design process.
- 8.8 Additional design guidance such as site specific development briefs and masterplans, Conservation Area Appraisals, Conservation Area Design Guides, and the Kent Downs Area of Outstanding Natural Beauty Management Plan and supporting guidance should be consulted as part of the design process where appropriate.

Policy BE1: Promoting High Quality Design

Development in Medway will be expected to be of high quality design that makes a positive contribution and respond appropriately to the character and appearance of its surroundings.

Proposals that incorporate high quality design and sustainability which demonstrably consider the following criteria will be permitted:

- The scale and form of development is appropriate to its surrounding context and is characteristic of Medway, or where appropriate new high quality character;
- The protection and possible enhancement of the historic environment and heritage assets;
- How the proposal relates to and/or reinforces the local distinctiveness and character through the use of high quality materials and local vernacular materials where appropriate; landscaping and building detailing;
- Working with the topography of the site and the incorporation of existing natural features;
- Responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site;
- Makes efficient use of land and ensures appropriate streetscapes;
- Good connectivity permeability that provides a clear user hierarchy for pedestrians, cycles, public transport and cars and that streets and spaces within new residential developments are not overly car dominated;
- Demonstration of provision and/or access to essential services and facilities;
- Respects the amenity of neighbouring uses through consideration of light levels, overshadowing, overlooking, loss of privacy, visual intrusion, appropriately designed car parking and ensuring minimal impact through noise, vibration, fumes or light pollution, and other relevant considerations;
- Creates a safe environment;
- Buildings that are appropriately flexible/adaptable and in appropriate circumstances transformable in the interests of sustainable life-long places;

- Provides for discreet waste and recycling bin storage and collection in accordance with the 'Medway Waste Management Requirements for New Developments' or other superseding guidance;
- High quality landscaping and areas of public realm that make use of or retaining features considered relevant/important by the Council and demonstrating linkages/contribution toward green infrastructure assets and networks;
- Achieves a transition from urban to rural where appropriate;
- Includes measures to mitigate and adapt to climate change.
- For development to demonstrate sustainability criteria, such as at least meeting a BREEAM standard of 'Very Good' for both energy efficiency and water efficiency.

The Council would expect compliance with the principles of nationally recognised standards, such as the Lifetime Homes and Building for Life (BfL12) Standards, so far as practicable, across all proposed new housing.

Proposals that fail to take the opportunity to incorporate high quality design will be resisted.

Question BE1:

Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?

What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

Sustainable Design

- 8.9 The impacts of climate change and the contributing factors must be considered through the design process. Wherever possible, new developments should incorporate mitigating measures as part of their design, construction and occupation.
- 8.10 New homes currently must meet a national Building Regulations standard for water efficiency of 125 litres/person/day. The National Planning Practice Guidance aims to exceed this standard through the imposition of locally adopted standards in order to promote additional water efficiency. New residential development in Medway therefore should meet the higher national water efficiency standard of 110 litres/person/day.
- 8.11 The Building Research Establishment Environmental Assessment Methodology (BREEAM) provides a nationally-recognised standard for the sustainable design of non-residential development. Non-residential development should meet a 'Very Good' BREEAM standard in terms of both energy efficiency and water efficiency.
- 8.12 Should the BREEAM standards be replaced, or any other national standards increased, the equivalent standards of the replacement scheme should be used. The voluntary use of sustainability assessment tools for residential development will also be encouraged.

Policy BE2: Sustainable Design

All new development should aim for high standards of sustainable design and construction where feasible.

For residential development this will include meeting the higher national water efficiency standard of 110 litres/person/day. Where possible on large developments, a water efficiency standard of 90 litres/person/day will be sought.

Question BE2:

Does the proposed policy for sustainable design represent the most appropriate approach for the Medway Local Plan?

What do you consider would represent a sound alternative approach towards sustainable design in the Medway Local Plan?

Housing Design

- 8.13 Through the introduction of the Nationally Described Space Standard (2015)¹⁰¹ which lays down minimum internal floor areas for dwellings, the Government has established that residential amenity and adequate space within homes is a planning concern. It is important that space standards in homes are sufficient for people's needs.
- 8.14 Planning Practice Guidance issued by the Government alongside the Nationally Described Space Standard nevertheless requires local planning authorities to provide justification for requiring internal space standards by:
- The identification of a need for such policies;
 - The effect of the policy on viability, particularly land supply; and
 - The establishment of transitional arrangements to enable developers to factor in the cost of space standards.
- 8.15 Achieving adequate residential standards remains a key planning objective for the Council, especially given the scale of growth envisaged for Medway. It is important that new development is designed to ensure long-term social and economic sustainability, continuing the quest for lifetime homes and to reduce future obsolescence in the face of changing economic, demographic and social trends.
- 8.16 The Impact Statement carried out with regard to introduction of the Medway Housing Design Standards (MHDS) in 2011 provided evidence of the need for space standards. It also established that meeting the standards would not have an undue effect on viability. This has proved to be the case since their introduction as the vast

¹⁰¹ Ministry of Housing, Communities & Local Government, '*Technical housing standards-nationally described space standard*', 2015, Available at: <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

majority of new dwellings constructed since the introduction of the Medway local standards have been compliant.

- 8.17 The Council will not be in a position to adopt the National Standard¹⁰² until it has produced and adopted its new Local Plan. However, given that the criteria of need and viability have been covered by the present MHDS, the Council will continue to expect that the internal floor areas of dwellings submitted for planning permission are adequate, and will use the National Standard as guidance on this matter, supporting existing policy relating to amenity. Schemes that comply with the internal floor areas laid down in the National Standard will be deemed to have adequate internal space by the Council.
- 8.18 In addition to the internal space standards that are the subject of the National Standard, the MHDS has specific standards on the following topics, which developers should continue to adhere to:
- Shared outdoor amenity space
 - Shared access and circulation
 - Cycle storage, refuse and recycling
 - Management
 - Visual Privacy and Private Outdoor space
 - Environmental comfort
- 8.19 Housing choice, flexibility and attractiveness are key considerations for people wishing to live in the area. The creation of functional spaces and the adaptability of a home will provide a better opportunity to secure long term occupation, i.e. lifelong homes. In a changing environment with greater emphasis on climate change and supporting people to be able to carry out their day-to-day activities, the adaptability of a dwelling is also important.

Policy BE3: Housing Design

New housing developments should provide good living conditions for future occupants with high quality, robust, adaptable housing and functional spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities. All new accommodation must, in addition to the general design policy above:

- As a minimum meet the relevant nationally described internal space standard for each individual unit;
- As a minimum meet the Medway Housing Design Standard (MHDS) for external spaces including shared outdoor amenity space, shared access and circulation, cycle storage, refuse and recycling, management, visual privacy and private outdoor space, environmental comfort;

¹⁰² Medway Council, 'Medway Housing Design Standards (interim)', Nov 2011, Available at: <http://www.medway.gov.uk/PDF/Medway%20Housing%20Design%20Standards%20Nov11.pdf>

- Be arranged to ensure primary habitable rooms have an acceptable outlook and where possible receive direct sunlight;
- Be designed to minimise the disturbance to occupants from other land uses nearby and/or other sources of noise, vibration and pollution;
- Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms, unless there is justification for doing so on the basis of a significant design quality gain;
- Incorporate sufficient space for storage and clothes drying;
- Encourage the extensive use of trees as a positive contribution to air/environmental quality within housing developments;
- Be designed with a clear and particular attitude to place-making and distinctiveness within their context.

Question BE3:

Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan?

What do you consider would represent a sound alternative approach for housing design in the Medway Local Plan?

Housing Density

- 8.20 There is a great variation in housing densities across urban and rural Medway. The higher density Victorian terraces in central urban areas contrast to lower density post war suburban development. More recently higher density apartment blocks have emerged along the frontage to the River Medway around Gillingham and Chatham.
- 8.21 National policy, as outlined in the NPPF, encourages locally set density requirements¹⁰³. This is in order to help authorities boost the supply of housing within their areas and make the most efficient use of land, where this does not compromise the quality of development. In considering options for Medway's development over the plan period, the council will explore opportunities to achieve higher densities in appropriate locations with the benefit of excellent public transport links. Such an approach has the potential to make a positive contribution to place-making. However development must respect the character and amenity of the surrounding area. Given the significance of Medway's heritage assets, this will be an important matter in determining the acceptability of development proposals.
- 8.22 Regeneration is a key element of the vision and strategic objectives for Medway's growth to 2035. The new Local Plan will have an important role in challenging longstanding negative perceptions by establishing a city centred on Chatham. In response to wider changes in retailing, central Chatham and its waterfront will be a

¹⁰³ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 47, p.12-13, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

hub for community life, with more homes and mixed uses generating footfall throughout the day, evening and night. This will support services and businesses, increase opportunities for social and cultural activity and bring about vibrancy and investment. Crucially, central areas will provide an accessible, convenient and safe environment for walking and cycling. This will help to promote a low carbon future and address poor air quality, obesity and inequality.

- 8.23 Linking sustainable transport and development is promoted as an approach to joint land use and transport planning by directing new, mixed use development to areas in close proximity to high-quality public transport. A renewed focus on the pedestrian and public space will enhance the attractiveness of the centre itself and the overall offer. In Medway, there are opportunities to raise densities in appropriate sites in close proximity to the rail stations in Strood, Rochester, Chatham (including the modern bus interchange), Gillingham and Rainham, all located at the heart of urban areas. This is consistent with the principles of 'smart growth', a sustainable approach to planning.¹⁰⁴
- 8.24 The 2017 Housing White Paper noted common misconceptions about high density¹⁰⁵, however research¹⁰⁶¹⁰⁷ has demonstrated how high density can be also be achieved in a suburban setting through combinations of house types and layouts and this is of particular relevance beyond Medway's central areas. 'Sustainable Suburbia' provides a blueprint for a walkable garden suburb by reconciling the aspirations and qualities of suburban housing with the communal benefits of high density, such as viable public transport.
- 8.25 In assessing the potential of sites to contribute towards Medway's development needs, the council has considered levels of accessibility and the principles of sustainable suburbia to make best use of land. Chatham will need to achieve the highest density as the city centre, while a restrained approach has been applied to other locations to respect their existing built form and heritage. Further details are set out in the Transport section and Housing Delivery background paper supporting this consultation document.
- 8.26 In line with meeting the differing needs for types of housing in Medway, the council recognises the need to plan for a range of densities in new developments to achieve sustainable development and deliver successful and attractive places with a distinctive sense of place.

¹⁰⁴ Smart Growth UK, 'A National Coalition pursuing sustainable communities planning and transportation- What is Smart Growth', Available at: <http://www.smartgrowthuk.org/>

¹⁰⁵ Department for Communities and Local Government, 'Fixing our broken housing market', February 2017, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

¹⁰⁶ <http://www.sustainablesuburbia.co.uk/>

¹⁰⁷ Savilis, 'Solving London's housing crisis, London needs to capitalise on infrastructure improvements to deliver the necessary housing', 2015 (SAVILLS.CO.UK), available at: http://www.savills.co.uk/research_articles/186866/187152-0

Policy BE4: Housing Density Approach

The council will seek the efficient use of land and secure positive contributions to place-making through supporting developments at higher densities in appropriate locations, where it can be demonstrated that it does not create an unacceptable impact on the surrounding amenity and environment, and has the potential to boost the vibrancy and vitality of town centres.

Density should be reflective of the particularity in its surroundings and make the most effective and efficient use of land.

The council will consider varying attitudes to density on a case by case basis in developing masterplans and development briefs for regeneration sites.

Densities surrounding transport interchanges (railway stations and bus stations) will be expected to be higher to reflect the nature of these areas as transport hubs providing sustainable travel choices.

A range of house types should be considered regarding housing mix.

Question BE4:

Does the proposed policy for housing density represent the most appropriate approach for the Medway Local Plan?

Is there an alternative way to express optimum net residential density, e.g. habitable rooms per hectare?

What do you consider would represent a sound alternative approach for housing density in the Medway Local Plan?

Historic Environment

8.27 The historic environment in Medway is an irreplaceable asset that lies at the heart of the local character, contributing to the local distinctiveness and helping to create a unique sense of place. Through the Medway Heritage Asset Review a range of themes were identified that are considered to be key factors contributing to the local character, including:

- Medway's location on the River Medway and the southern bank of the River Thames;
- The high quality agricultural land;
- The establishment of the Roman road *Watling Street*, and the associated river crossing at Rochester Bridge;
- The geological makeup of the area; and
- The range of religious and ritual funerary structures.

8.28 Providing a basis for the Heritage Strategy (to be published in 2018), the Medway Heritage Asset Review provides an in-depth analysis of these themes, their legacy,

how they can be interpreted today through heritage assets, and the importance of their future role in delivering sustainable growth that contributes positively to Medway's unique character and local distinctiveness.

- 8.29 Medway benefits from some of the region's most celebrated heritage assets, many of which are recognised through national designation by Historic England; such as Scheduled Ancient Monuments, Listed Buildings and Registered Parks and Gardens. Furthermore, there are those identified at a more local level, such as Conservation Areas, Locally Listed Buildings, historic landscapes, development patterns, important views and vistas, and the archaeology.
- 8.30 The NPPF recognises 'heritage assets' as both 'designated' assets and any 'non-designated' assets identified by the Local Planning Authority.
- 8.31 A number of historic assets in Medway are considered to be 'at risk' through neglect, decay or other threat. Assets considered 'at risk' will be monitored by the council, who will seek to bring them back into use and/or into a good state of repair. Through the delivery of its Local Plan and its wider activities, the council will act to conserve and enhance Medway's heritage assets.

Policy BE5: Historic Environment

To ensure the continued contribution that the historic environment has on Medway, the council will support the conservation and, where possible, the enhancement of the historic environment; including the heritage assets and their distinctiveness and characteristics. This will be achieved through:

- Restricting development that could have an unacceptable impact on a designated heritage asset and its setting;
- Ensuring that all new development contributes to local distinctiveness and character;
- Encouraging development that makes sensitive use of historic assets, particularly where they are under-used or redundant;
- Promoting the preservation of historic buildings considered to be 'at risk';
- Resisting demolition or destruction of heritage assets without substantial justification that clearly demonstrates that public benefit outweighs the harm or loss resulting from the demolition or destruction;
- Working with stakeholders on heritage initiatives, including bids for funding.

- 8.32 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest. In making decisions regarding a Listed Building, the council must have particular regard to the importance of preserving the buildings character or features that are of special architectural or historic interest. The Act also requires the council to have particular regard to the importance of preserving the character, appearance or setting of conservation areas.

- 8.33 Any alteration, extension, conversion or change of use of a heritage asset must be sympathetic and, where possible enhance the asset; ensuring that it does not lead to any unacceptable adverse impact on the asset or its setting.
- 8.34 In instances where proposed development may impact upon a heritage asset or its setting, an appropriate heritage assessment will need to be submitted that assesses the level of impact.
- 8.35 As part of determining a planning application that may impact upon a heritage asset, an assessment of any potential harm will be weighed against any wider benefits of the development.
- 8.36 Further information on the historic environment and heritage assets in Medway are available in published Conservation Area Assessments, the Medway Heritage Asset Review, Landscape Character Assessment and from the Medway Council Design and Conservation Team.

Policy BE6: Managing development in the historic environment

Development that impacts a heritage asset, or its setting, should achieve a high quality of design which will preserve or enhance the asset's historic or architectural character, appearance and setting.

Where a development impacts upon a heritage asset, or its setting, a proportionate heritage assessment must be submitted that assesses the level of impact.

The demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that all possible methods of preserving the asset have been investigated. In the circumstances where the loss of a heritage asset can be fully and robustly justified, the developer must make information about the heritage asset and its significance available to the council, along with making it possible for any materials and features to be salvaged.

Where a development involves, or has the potential to involve heritage assets with archaeological interest, applicants must submit a desk-based assessment, or where appropriate, a field evaluation.

Question BE5:

Do the proposed policies for the historic environment represent the most appropriate approach for the Medway Local Plan?

What do you consider would represent a sound alternative approach towards planning for the historic environment in the Medway Local Plan?

SECTION 9

HEALTH AND COMMUNITIES

9.1 The Local Plan aims to improve the quality of life for Medway's residents, meeting their needs for services and providing the opportunities that support people in living healthy and fulfilling lives. The social role of sustainable development is embedded in national planning policy.¹⁰⁸ Responses to earlier rounds of consultation on the emerging Local Plan called for greater recognition to be given to quality of life in planning for Medway's future, and that the impacts of development and change on local people are addressed. The council's objectives for the Local Plan include promoting health and wellbeing, access to services and enhanced opportunities for residents. It recognises that there are marked inequalities in health across the area. Medway's population is changing, such as an increasing proportion of older people and more diverse communities. The range of services and facilities in the area has altered, as seen in the closure of local pubs and shops, and merger of facilities, as lifestyles and organisations have changed. These are key considerations for the new Local Plan.

Health

9.2 Medway Council is committed to reducing health inequalities, increasing life expectancy and improving the quality of life of those who live and work here. People's lifestyles and environment affect their health and wellbeing and each of these lifestyle risk factors is unequally distributed across Medway. Medway performs poorly against key public health outcomes in life expectancy and causes of death as a result of inequalities¹⁰⁹. Average male life expectancy is below the national average, and there are pockets of marked health issues in some neighbourhoods, with reduced life expectancy and health impairments. Lifestyle issues including smoking, obesity and alcohol are key contributors to high mortality rates, particularly circulatory disease, cancer and respiratory disease. With an ageing population, the number of people living with dementia, and other long term limiting illnesses is projected to increase.

9.3 Planning has a role in supporting healthier lifestyles, particularly in:

- Promoting healthy lifestyles by providing a safe, green, attractive and inclusive infrastructure that will encourage people from all sectors of the community to increase their everyday activity through walking and cycling and other physical activity and participation of all sectors of the community in active lifestyles;
- Improving access to healthcare and services;

¹⁰⁸ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 8, p.3, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁰⁹ Medway Council, 'Annual Medway Public Health Report', Available at:

http://www.medway.gov.uk/search?q=medway%20public%20health%20report&site=All&client=Medway_frontend&output=xml_no_dtd&proxystylesheet=Medway_frontend

- Supporting access to healthy and affordable food, including opportunities for food growing.
- 9.4 One of the council's biggest aspirations is to enable all of Medway's people, both residents and people who work here, to enjoy an outstanding quality of life, including happy, healthy, safe and fulfilled lives. Quality of life is essential to physical and mental health and wellbeing and relates to every facet of life. Challenges to this may include the lack of skills needed to secure productive employment; an unfit and poorly insulated home; poor access to public open space; not having access to affordable healthy food; reduced opportunities to be physically active as part of everyday life; having limited opportunities for food growing; lack of access to health care; fear of crime; or a lack of social interaction and sense of community. Alongside creating and sustaining economic growth, we wish to place residents, workplaces and communities in a position to take advantage of the opportunities growth brings.
- 9.5 Healthy food environments can help address obesity. Areas where there are opportunities for people to buy affordable healthy food can help support healthier lifestyle choices. There are also positive benefits in people having space, such as allotments, where they can grow their own food. Obesity levels in Medway are above average and the council supports an integrated programme to address the problem through healthy eating and physical activity.
- 9.6 In some areas there is a proliferation of hot food takeaways with menu choices high in fat, salt or sugar. In 2014 the Council published a Hot Food Takeaway Guidance Note¹¹⁰ to restrict the number of these facilities within close proximity to a school and avoid over concentrations of takeaways in one location. This document has been used in planning application decisions and is seen as a successful tool as part of a wider strategy to help facilitate a change in the health of Medway's residents.
- 9.7 Medway is projected to see an increase of 31,000 residents aged over 65 by 2035. With this population change, planning for the needs of older people is a key consideration for the Local Plan. Medway seeks to establish the area as 'Dementia Friendly', embedding awareness of the needs of people with dementia and their carers in service design and delivery. This will include how public places and buildings are designed to make it easier for people with dementia to find their way around and be safe. This will also help to deliver on the council's ambitions that Medway's growth should benefit all, and will take consideration of the needs of different groups in the community with physical and learning disabilities. In planning for Medway's future, the council will seek to retain and develop sustainable and accessible neighbourhoods, where people can easily reach a range of services and facilities, and reduce the risk of social isolation through enabling interactions in the wider community. These key principles will be embedded in planning for the design of new neighbourhoods and public places.
- 9.8 The council will encourage new development to promote opportunities to improve health. It supports the use of Health Impact Assessments (HIAs) to identify how

¹¹⁰ Medway Council, 'Planning Policy', Available at: www.medway.gov.uk/planningpolicy

proposed development might have positive or negative effects on health through use of a Rapid Health Impact Assessment Tool (2017).¹¹¹ This assessment helps to ensure that health and wellbeing are properly considered in development proposals. HIAs are best done at the earliest stage possible to look at the positive and negative impacts of a development as well as assessing the indirect implications for the wider community. The aim is to identify the main impacts and provide the basis for review to maximise the benefits and avoid any potential adverse impacts.

Healthcare facilities

- 9.9 Access to healthcare is one of the greatest concerns raised by local people in consultation on the emerging Local Plan. Residents already experience difficulties in registering with GPs, and getting appointments at local surgeries and the hospital. People fear that these services will be placed yet further strain with the increased population projected for the area. The council's work on infrastructure planning, as part of the evidence base for the new Local Plan, has identified several issues of capacity. There are high numbers of GP practices where the number of patients per GP is above the national average. There is also a challenge in succession planning as many GPs approach retirement age, and difficulties in recruiting replacement staff. Medway Maritime Hospital is also under increasing pressure, and many local people have asked that the Local Plan look at identifying a site for a new hospital.
- 9.10 Since the Health and Social Care Act was implemented in 2012, provision has undergone major change, and will continue to do so. Responsibility for public health was passed to Local Government, meaning the council now has this responsibility within its area. Clinical Commissioning Groups are responsible for commissioning of healthcare at a local level.
- 9.11 The Local Plan must put effective and timely delivery of services and infrastructure for health at the forefront of its ambitions for sustainable growth. However, Planning provides only part of the solution to meeting healthcare needs. Through the Local Plan, and planning applications for development, the council can identify and secure land needed for new or expanded health care facilities, such as surgeries or health centres. The council collects funding from developers of housing schemes over 10 homes that is passed to the Clinical Commissioning Group to invest in local GP services. Wider structural and personnel issues in the NHS are often the cause of pressures on local health services and lack of capacity, such as difficulty in recruiting staff.
- 9.12 The NHS, Medway Council and Kent County Council as the major healthcare, social care and public health providers in the area have drafted a Sustainability and Transformation Plan, 2016¹¹². This highlights the need to evolve the model of care provision to develop larger multi-modal practices that provide a range of services.

¹¹¹ NHS London Healthy Urban Development Unit, *'HUDU Planning for Health: Rapid Health Impact Assessment Tool'*, 2017, available at: <https://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2017/05/HUDU-Rapid-HIA-Tool-3rd-edition-April-2017.pdf>

¹¹² NHS Medway, *'Sustainability and Transformation Plan- NHS and social care leaders make 'case for change' in Kent and Medway'*, available at: <https://www.medway.nhs.uk/about-us/sustainability-and-transformation-plan.htm>

These could be based on the present healthy living centre model within Medway. The outcomes of this review process will inform the policy provision for healthcare facilities in the new Local Plan.

Policy HC1: Promoting Health and Wellbeing

The council is committed to reducing health inequalities, increasing life expectancy and improving quality of life. It will support work to improve economic and social opportunities to tackle disadvantage across Medway by:

- Seeking opportunities to improve access to healthcare facilities and activities that promote physical and mental health and wellbeing.
- Requiring planning applications for major new residential developments where Environmental Impact Assessments are required, or developments identified by the council with the potential for negative health impacts, to be accompanied by a health impact assessment in line with the HUDU Rapid Health Impact Assessment Tool. The results of this assessment will be a material consideration in determining applications.
- Helping to tackle obesity, encourage physical activity and support mental wellbeing, through the provision of greenspaces, public realm and sports facilities accessible to all, creating and enhancing environments conducive to walking and cycling.
- Ensuring new development is sustainably located with access to local health facilities, and contributes to increasing capacity in line with the scale of proposed growth, and the council's policy for infrastructure contributions from developers.
- Increasing access to healthy food choices through extending opportunities for growing food such as allotments & community gardens; securing a range of local services; and a reduction in the proliferation of uses promoting unhealthy food options, including controls on A5 uses, in line with the council's Hot Food Takeaway Guidance Note.
- Promoting health and wellbeing through the design and layout of development in order to mitigate health conditions, such as dementia, and improve the accessibility of public places.
- Working alongside healthcare commissioners to plan for the future of acute care the council will seek to investigate the redevelopment of the present Medway Maritime Hospital site and if deemed necessary the relocation, or partial relocation of some services, to a new site within Medway.

Question HC1:

Does the proposed policy for Health and Wellbeing represent the most appropriate approach to planning for health improvements in Medway?

Question HC2:

Do you agree with the proposed threshold for HIAs?

Question HC3:

Do you agree with the council's proposed approach to managing Hot Food Takeaways?

Question HC4:

What do you consider would represent a sound alternative approach towards planning for health in the Medway Local Plan?

Community Facilities

- 9.13 Community facilities including local shops, meeting places, such as village halls and community centres, sports venues, cultural buildings, public houses and places of worship form part of social infrastructure. They bring people together, tackle loneliness, build cohesive and healthy communities, and help to create attractive places to live. They provide a focus for community life, and are integral to sustainable development, as endorsed in national planning policy.
- 9.14 The council recognises the importance of community facilities in towns, neighbourhoods and villages. These facilities, especially halls, were identified in earlier rounds of consultation on the emerging Local Plan as vitally important to local communities. People valued the distinct sense of community in their local areas, and raised concerns that new development could damage these intrinsic qualities.
- 9.15 As Medway's population grows and changes, it is essential there is a strong network of community facilities to support social activities and interactions. For many residents, including older people and young families, having local facilities that are easy to reach is particularly important to retain a good quality of life, and health and wellbeing. New and growing communities within Medway, such as students and people from minority and ethnic backgrounds may have specific interests that need to be addressed in planning the provision of community facilities, including places of worship.
- 9.16 Some of the existing facilities, such as halls, are ageing and community groups can struggle to maintain and improve quality standards.
- 9.17 Around 12% of Medway's population lives in the rural area. The council recognises that rural communities are particularly vulnerable to the loss of community facilities. Trends in recent years have seen the closure of rural pubs, post offices and shops. Villages without a shop or a place for people to meet can become unsustainable. The council has undertaken a village infrastructure audit¹¹³ in conjunction with parish councils to identify the range and condition of services, such as village shops, halls, and parks in Medway's rural area, and how these met the needs of local communities. This work found that poor public transport and broadband connectivity were key problems for the area, increasing the importance of local facilities. The report also identified that there was a good coverage of community facilities across the villages, but some were in need of improvement.

¹¹³ Medway Council, 'Planning Policy', available at: www.medway.gov.uk/planningpolicy

- 9.18 The council has also gathered evidence¹¹⁴ on how well urban communities are served by local facilities. Many of these facilities are located in the town centres, but there is a wider network of social infrastructure in neighbourhoods across the urban and suburban areas, often located in district and local centres. The survey found that facilities were generally well used, were well located and most were in sufficient condition for the activities undertaken. However many had plans to expand to keep pace with demand from users.
- 9.19 In planning for town, village and local centres across Medway, the Local Plan will consider the need to secure a range of community facilities. Much of the growth planned for Medway over the plan period is likely to be located in large developments that extend or establish neighbourhoods, towns or villages. The council will expect the provision of community facilities to be integral to the planning of large developments, so that residents can easily access a range of services, supporting community life. Large scale housing development without adequate provision of community facilities will not be acceptable.

Policy HC2: Community Facilities

The council recognises the importance of community facilities and the need for an appropriate range of facilities as a key component of sustainable development. The council will seek to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors.

The council will support appropriate development that seeks to enhance community facilities, that does not have a negative impact on the surrounding amenity, historic and natural environment and transport networks.

The council will require provision to be made for community facilities in planning for new development. Large scale residential developments will be required to provide community facilities to meet the needs of new residents and seek opportunities to support integration with existing communities.

New community facilities should be located within or near the community they are intended to serve and should be appropriately located to limit the need to travel, being accessible to users by walking, cycling and public transport.

If the development is smaller scale and community facilities cannot be accommodated on site, a contribution will be sought to upgrade appropriate facilities off site, where it can be demonstrated that they are accessible to residents of the new development and that there is capacity for the increased population. All developments for over 10 homes will be required to contribute to upgrading community facilities in line with the council's policy on infrastructure contributions from developers.

¹¹⁴ Urban Facilities Report at:
<http://www.medway.gov.uk/planningandbuilding/planningpolicy/localplanevidencebase.aspx>

There is a presumption against the loss of community facilities in rural and urban areas. Any proposal which would result in the loss of a community facility¹¹⁵ will not be permitted unless:

- an alternative community facility which meets similar local needs to at least the same extent is already available; and
- it can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character and vitality of the area; and
- in the case of commercial community facilities, it has been demonstrated that it is no longer economically viable and cannot be made so.

Question HC5:

Does the proposed policy for Community Facilities represent the most appropriate approach to planning for this aspect of social needs in Medway?

Do you agree with the proposed approach to addressing the presumption against loss of community facilities?

What do you consider would represent a sound alternative approach towards planning for community facilities in the Medway Local Plan?

9.20 In considering proposals that involve the loss of community facilities, the council will require evidence not only that an alternative facility or facilities can be found within easy walking distance but that there is at least one such facility which offers services and an environment comparable to that of the facility subject to the proposal.

9.21 Regarding local needs, the council will require evidence that there has been public consultation to ascertain the value of the facility to the local community. If the facility is registered as an Asset of Community Value then the council will regard this as a material consideration in the determination of any planning application affecting the facility..

9.22 On viability, the council will require evidence demonstrating that:

- the existing or recent business is not financially viable, as evidenced by trading accounts for the last three years in which the business was operating as a full-time business;
- a range of measures were tried during this time to increase trade and diversify use; the potential for the property to extend the range of facilities offered at the site has been fully explored;

¹¹⁵ Department for Communities and Local Government, 'National Planning Policy Framework', paragraph 70, p.17, 2015 Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- for public houses, the CAMRA Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes show that the public house is no longer economically viable.
- 9.23 Also on viability, the council will require evidence that all reasonable measures have been taken to market the facility to other potential operators. The facility must have been marketed for at least 12 months either as the current type of facility or as an alternative community facility, at a price agreed with the council following an independent professional valuation (paid for by the developer). In turn there must have been no interest in purchasing either the freehold or leasehold as a community facility. The business must have been offered for sale locally, and in the region, in appropriate publications and through relevant specialised agents.

Neighbourhood Planning

- 9.24 The council will continue to work with parish councils and community organisations in identifying and planning for the needs of communities across Medway. This includes support for the preparation of Neighbourhood Plans. The government encourages local communities to prepare Neighbourhood Plans to help shape their areas. Once formally 'made', that is adopted, the Neighbourhood Plan forms part of the Development Plan. This means that it is planning policy that must be taken into account when determining planning applications.
- 9.25 Currently there is one designated Neighbourhood Planning area in Medway, in the parish of Cliffe and Cliffe Woods. The steering group is liaising with the council in progressing its plan, to coordinate with work on the new Medway Local Plan. Based on the uptake of neighbourhood planning across the country, it is anticipated that further communities will come forward in rural and urban Medway to develop their own neighbourhood plans. The council will continue to provide support to forums and parish councils preparing neighbourhood plans in Medway.

INFRASTRUCTURE

- 10.1 The services and facilities that make up the area's infrastructure provide a vital network supporting economic and community life, and managing impacts on the environment. Medway has a diverse and complex infrastructure network, from strategic energy, communications and transport services, to parks, schools and halls serving local communities. The demands of a growing and changing population, and wider changes in how we live and work, have placed pressures on infrastructure and services. For many local people who responded to earlier rounds of consultation on the emerging plan, planning for infrastructure improvements was the most important issue for the plan to address.
- 10.2 Infrastructure is a vital component of the Local Plan as it is essential for a place to function well. Infrastructure planning is a key requirement of Government planning policy¹¹⁶ and its economic strategy. It encompasses transport, water supply, wastewater, energy, telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management.¹¹⁷ The Industrial Strategy White Paper 2017¹¹⁸, set out the Government's economic vision for boosting the country's productivity and earning power of people throughout the UK. A key aspect of this strategy is a commitment towards increased investment in infrastructure to drive growth across the UK.
- 10.3 To ensure that existing and new residents/businesses benefit from the growth that will be delivered in Medway over the plan period it is important that infrastructure is delivered in support of new developments in a timely fashion and in appropriate locations. This section of the consultation document considers education, communications technology, utilities and open space and sports. Other aspects of infrastructure are covered in other sections of this document.
- 10.4 The council has researched current infrastructure capacity and its ability to meet increased demand in line with the growth proposed in the new Local Plan¹¹⁹. The Council has had discussions with infrastructure providers, such as utilities companies and transport bodies, as part of the plan preparation process. This work has shown that there are infrastructure deficiencies in many areas. The council seeks to use the Local Plan as a means of securing new and improved infrastructure and services, and policy interventions. In assessing the suitability of areas to accommodate growth,

¹¹⁶ Department for Communities and Local Government, 'National Planning Policy Framework', Paragraph 156, pg.37, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹¹⁷ Department for Communities and Local Government, 'National Planning Policy Framework', Paragraph 162, pg.40, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹¹⁸ Department for Business, Energy & Industrial Strategy, 'Industrial Strategy: Building a Britain fit for the future', 27 November 2017, Available at: <https://www.gov.uk/government/publications/industrial-strategy-building-a-britain-fit-for-the-future>

¹¹⁹ Medway Council, Local Plan Evidence Base, Available at:

<http://www.medway.gov.uk/planningandbuilding/planningpolicy/localplanevidencebase.aspx>

the council has considered the potential for mitigating impacts on infrastructure, and providing new services.

- 10.5 The Local Plan has particular regard to strategic infrastructure which has impacts over an area greater than Medway, and which may be of national significance. These form part of the council's engagement with other local authorities and key bodies on cross border matters through the Duty to Cooperate. Major development proposals in the wider area, including the Lower Thames Crossing, may have implications for Medway's infrastructure planning.
- 10.6 The council is producing an infrastructure delivery plan to sit alongside the Local Plan. It will identify the key infrastructure interventions needed to meet the required growth over the plan period.¹²⁰ The plan will be published with the draft Local Plan at the next stage of consultation. The draft plan will also include a range of strategic and supporting development management policies that set out the requirements for infrastructure, associated with development.

Policy I1: Infrastructure Planning and Delivery

The council will seek the timely and effective delivery of infrastructure to support the local economy and meet the needs of Medway's communities. It will seek opportunities through working with government agencies, infrastructure bodies, developers and partner organisations to secure improvements to infrastructure in Medway.

It will produce and regularly review an Infrastructure Delivery Plan, identifying the range, cost and scope of infrastructure improvements required in Medway.

Development coming forward in Medway will be expected to contribute to the delivery of new and improved infrastructure, in line with the council's evidence base and policy for infrastructure contributions from developers.

Appropriate conditions will be attached planning permissions in order to make development acceptable and to support the provision of infrastructure.

The council will identify land for safeguarding for the provision of future infrastructure where required to meet specific development needs.

The council will engage with appropriate bodies on strategic infrastructure planning matters, meeting the Duty to Cooperate and where appropriate, and through Statements of Common Ground supporting plan making.

Question I1:

Does the proposed policy for Infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway?

¹²⁰ Department for Communities and Local Government, 'National Planning Policy Framework', Paragraph 177, pg.42, 2015 Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

What do you consider would represent a sound alternative approach towards planning for infrastructure in the Medway Local Plan?

Developer Contributions

- 10.7 Development will be expected to mitigate its impacts through planning obligations. This is supported by national policy which directs obligations to be 'necessary, directly related and fairly and reasonably related' to the development.¹²¹ Contributions for upgrading services and infrastructure can be requested through different mechanisms including Section 106 agreements or Community Infrastructure Levy (CIL) contributions, and conditions. The council currently makes use of S.106 agreements and conditions, and its policy is set out in the Medway Guide to Developer Contributions and Obligations¹²². It will respond to any updated government guidance and legislation on developer contributions, planning conditions and approaches to viability testing. This may involve the possible implementation of a locally adopted CIL or other recognised funding mechanism to provide for contributions for strategic infrastructure supporting the development of the wider area. The cumulative impact of all development and needs for infrastructure provision will be reflected in any resulting tariff attached to such an approach.
- 10.8 The Local Plan needs to be deliverable if it is to achieve the vision and strategic objectives set for Medway's growth. The council aims to achieve quality development that fairly contributes to meeting the needs of residents and avoids or mitigates any negative impacts, but does not place unacceptable demands on developers that can not be delivered.

Policy I2: Developer Contributions

To make development acceptable and enable the granting of planning permission, deficiencies in infrastructure arising from proposed development will be mitigated through developer contributions and conditions.

Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to provide or contribute towards the additional requirement to an agreed delivery programme. Where demonstrated to be necessary, the council will require that infrastructure is delivered ahead of the development being occupied.

Where developers consider that providing or contributing towards the infrastructure requirement would have serious implications for the viability of a development, the council will require an "open book" approach and, where necessary, will operate the policy flexibly.

204, pg.47, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹²² Medway Council, *Guide to Developer Contributions* (2014), Available at:

<http://www.medway.gov.uk/PDF/GUIDE%20TO%20DEVELOPER%20CONTRIBUTIONS%202014.pdf>

Question 12:

Does the proposed policy for developer contributions represent the most appropriate approach?

What do you consider would represent a sound alternative approach for developer contributions in the Medway Local Plan?

Education

- 10.9 Local planning authorities should take a proactive, positive and collaborative approach to ensuring that a sufficient provision and choice of school places is available to meet the needs of communities and authorities should give great weight to the need to create, expand or alter schools to widen choice in education.¹²³
- 10.10 As a unitary authority, Medway Council is a Local Education Authority. Within Medway there are 35 day nurseries, 60 pre-schools, 78 primary schools, 17 secondary schools and one all-through school, as well as further education and university provision. Boosting educational attainment and qualifications and skills levels in Medway is a core priority. This underpins the area's economic performance and opens up greater job and social opportunities for residents. The Local Plan can help in these ambitions, by supporting the provision of nurseries and schools and the development of the higher and further education sector.
- 10.11 A learning quarter of further and higher education has been established in the Chatham Maritime area, with the Universities at Medway, Mid Kent College and the University Technical College. These have a major social and economic impact on the area and are set to expand further over the plan period.
- 10.12 The latest population projections for Medway have indicated that the proportion of young people will be relatively stable over the plan period. In 2014 the number of 0-15 year olds was 20.2% of the population and by 2035 this would be 19.5%.¹²⁴ Planning for school places therefore needs to keep pace with the projected growth in Medway's population.
- 10.13 The latest Medway School Organisation Plan was produced in 2017. Following a recent programme of expansions and new schools, there is generally sufficient capacity in primary education in the early part of the plan period. However additional capacity will be needed after 2021.¹²⁵ There is a similar position within the secondary education, with existing capacity only until 2020.¹²⁶ The Education Planning Team at Medway Council has identified locations where there is sufficient space at existing

¹²³ Department for Communities and Local Government, 'National Planning Policy Framework', Section 8, Paragraph 72, pg.17, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹²⁴ Medway Council, 'Medway Authority Monitoring Report 2016-17', Vol. 1, p.28, Available at:

<http://www.medway.gov.uk/pdf/Vol1AMR2017FINAL.pdf>

¹²⁵ Medway Council, 'Annual Review of the School Organisation Plan (2017)', Available at:

<https://democracy.medway.gov.uk/mgconvert2pdf.aspx?id=38033>

¹²⁶ *ibid* 125

school sites to allow for expansion, but also areas of Medway where new schools would be needed.

- 10.14 Schools have associations with other uses, such as sports facilities and community halls. As part of the plan's strategy to create more sustainable places and to make the best use of land and resources, the council will support the co-location of community facilities with education uses, where appropriate.

Policy I3: Education

Early Years & School Provision

As Medway's population grows additional school places will be needed. New residential developments of significant scale will be expected to provide education facilities within their development in order to create sustainable communities. The requirements will be informed by the council's School Organisation Plan and Education Planning team providing an assessment of the capacity and suitability of existing local schools to expand existing school provision.

All proposals for residential developments over 10 homes will be required to contribute to the funding of education services in accordance with the council's policy for infrastructure contributions from developers.

Proposals for the upgrading and expansion of existing schools and development of new schools in locations where additional provision is required will be supported subject to the criteria below. The council may use its Compulsory Purchase powers to facilitate the development of new schools where necessary.

Proposals for new education facilities should:

- have safe access by cycle and walking, public transport and car and incorporate a school travel plan;
- have safe drop-off and pick-up provision;
- provide outdoor facilities for sport and recreation; and
- avoid conflict with adjoining uses.

The Council supports consideration of opportunities for co-location of community services and shared use facilities on school sites. Educational facilities shall be encouraged to diversify to provide a wider range of services to benefit the whole community, such as sports facilities or community centres open to the public.

Further & Higher Education

The development and expansion of the Universities at Medway and Higher and Further Education Colleges will be supported within the 'learning quarter' at Chatham Maritime. Development of supporting uses where there is an identified link to the Universities and other research and development establishments will be supported where appropriate, and does not conflict with other policies in the plan.

Question 13:

Does the proposed policy for Education represent the most appropriate approach for planning for education facilities?

What do you consider would represent a sound alternative approach for planning for education facilities in the Medway Local Plan?

Communications Technology

- 10.15 Telecommunications are intrinsic to how we now live and work. Access to good broadband and telephone services are essential for business, learning and communities, and provision of high speed broadband services is a key component of a successful economy. The council seeks to establish Medway as a well-connected smart city that offers a competitive base for businesses and excellent telecommunications services for residents.
- 10.16 National policy supports the development of digital and communications infrastructure in planning for sustainable places.¹²⁷ This form of development should be carefully sited, with regard to local amenity, heritage and landscape, but not discouraged. The mobile phone network and coverage has increased in importance with the reliance on mobile technology to stay in contact and do business through mobile phones and tablets. Medway is generally well served by mobile network coverage. However there are weak spots across the authority area; including: Hoo Peninsula, Hempstead, Rainham and parts of Strood.¹²⁸
- 10.17 The government has recognised the role of effective high speed broadband in supporting and driving the economy. It has invested in its Broadband Delivery UK (BDUK) programme to extend superfast broadband coverage across the UK, and is introducing a broadband Universal Service Obligation so that by 2020 everyone across the UK will have a clear, enforceable right to request high speed broadband.
- 10.18 Medway Council is working with Kent County Council on the BDUK programme. 134,000 homes and businesses have been connected to superfast broadband resulting in a total coverage of 95% of properties across Kent and Medway.¹²⁹ However there are still issues within the provision of the broadband across Medway. Ofcom statistics indicate that there are areas of disparity within Medway with a rural urban split.¹³⁰ The rural wards in Medway experience download speeds below the UK average, whilst the urban wards exceed it. In March 2017, the Government

¹²⁷ Department for Communities and Local Government, 'National Planning Policy Framework', Section 5, Paragraph 43, pg.11, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹²⁸ Think Broadband,

<http://maps.thinkbroadband.com/#lat=51.40693073873729&lng=0.5937778239746372&zoom=12&type=terrain&exchanges>

¹²⁹ Kent County Council, 'Making Kent Quicker', Available at: <http://www.kent.gov.uk/leisure-and-community/broadband/making-kent-quicker>

¹³⁰ House of Commons Library, 'Broadband coverage and speeds: local statistics', 2017 Available at: <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-8200#fullreport>

released its 5th Generation (5G) Strategy for the UK¹³¹, with the rollout of the next generation of mobile networks expected to commence in 2020. The council anticipates more base and booster stations will be required than for the current 3G and 4G networks across Medway and will aim to work with the telecommunications industry to agree suitable provision and shared guidance.

Policy I4: Communications Technology

In order for Medway to achieve its economic and social potential and maintain its status as a well-connected place to live and work, the Council will seek to develop and enhance the provision of broadband and telecommunications infrastructure coverage across Medway.

When considering proposals for the development of communications installations, regard will be given to:

- operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications apparatus;
- the potential for sharing existing masts, buildings and other structures; and
- the impact of the development on its surroundings with particular regard to the visual amenity, character or appearance of the surrounding area, and the proposed provision of landscaping.

Apparatus and associated structures sited on a building should be sited and designed in order to seek to minimise impact to the external appearance of the host building.

Development should not have an unacceptable effect on conservation areas or buildings of architectural or historic interest or areas of ecological interest or areas of landscape value or sites of archaeological importance.

Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.

Broadband

Proposals for new major employment and residential developments should include appropriate infrastructure, wired and wireless, to provide high speed internet access as part of the development.

Question I4:

Does the proposed policy for Communications represent the most appropriate approach for the Local Plan?

What do you consider would represent a sound alternative approach for planning for communications infrastructure in the Medway Local Plan?

¹³¹ Department for Culture Media & Sport, 'Next Generation Mobile Technologies: A 5G Strategy for the UK', 2017, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/597421/07.03.17_5G_strategy_-_for_publication.pdf

Utilities

- 10.19 Utilities such as water, energy and sewage are vital to enable development to be sustainable and function effectively. Planning policy must assess the quality and capacity of infrastructure in considering the needs and impacts of development. Medway is within an area of water stress, and some capacity issues have been identified.¹³² Southern Water is the provider of water and waste water services within Medway and has identified that supply is balanced in the early part of the plan period but there is a need towards the later period.¹³³ Water supply and provision for the treatment of waste water are increasingly seen as key issues in planning for and delivering development. There are pressures on the existing services and in planning for sustainable growth, it is essential that there is greater coordination and investment in key utilities. The council, with other local authorities and the development sector in Kent, supports early engagement with water services providers to plan strategically for growth as set out in Local Plans.
- 10.20 With the level of growth projected in Medway, the capacity in the utilities networks will likely change over time. Capacity will need to either be built in to the system through expansion of facilities or efficiencies made in the system to allow for spare capacity to be developed.
- 10.21 The council will continue to work with utilities providers to share information on planned levels and locations of growth to assess the capacity of systems to meet increased needs, and to identify any upgrades required, or where limits on development need to be considered.

Policy I5: Utilities

Any new development will be supported by the requisite utilities infrastructure.

The council seeks early engagement with utilities providers in planning to meet the strategic growth needs of Medway as set out in the Local Plan, and which supports the timely and sustainable delivery of development.

Significant new development proposals will be assessed to determine the impact on the existing network (water, electricity and gas).

Question I5:

Does the proposed policy for Utilities represent the most appropriate approach for the Local Plan?

What do you consider would represent a sound alternative approach for planning for utilities infrastructure in the Medway Local Plan?

¹³² Environment Agency, 'Water Stressed Areas (2013)', Available at: <https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>

¹³³ Southern Water, 'Water Resources Management Plan 2015-40', Available at: <https://www.southernwater.co.uk/media/default/pdfs/WRMP-technical-report.pdf>

Sport and Recreation

- 10.22 Medway is one of the largest conurbations in the South East with a diverse open space estate of 1,900 ha, including country parks, playing fields, play areas, formal parks and gardens and allotments. Residents and businesses have expressed their concern in response to previous consultations about the scale of growth and the impact on Medway's open spaces and facilities for sport and recreation. This will be determined by the type of land available and investment. A recent study found that 28% of the land in Medway is built on, 55% is farmland and 10% 'Natural' land.¹³⁴ 7% of land in Medway is made up of managed greenspaces such as parks, gardens and sports grounds, providing opportunities for sport and recreation. The River Medway, along with the skiing and ice skating facilities, provide for other activities beyond mainstream sports. The new Local Plan will need to protect and enhance existing facilities and provide new facilities to accommodate growth.
- 10.23 The sport and recreation policies have been prepared in accordance with national planning policy, Sport England guidance and the Medway policy framework.¹³⁵ Responses to previous consultations and the emerging evidence base have informed the scope and detail of the policies.
- 10.24 Gillingham Football Club promoted a site for a "state-of-the-art modern stadium, enabling development and other facilities" during the previous consultation. In response, a specific policy is set out below in recognition of the football club's strategic and community role in Medway.

Open Space and Sports Facilities

- 10.25 The plan's vision establishes Medway as an area noted for its revitalised centres and natural assets, while the strategic objectives emphasise the role of infrastructure and quality design to facilitate walking, cycling and recreation. These are also important elements of the Medway policy framework.
- 10.26 National planning policy sets out the government's aspirations and requirements for sport and recreation which can be described as the need to "protect existing facilities,

¹³⁴ Mark Easton, 'How much of your area is built on?', (BBC.CO.UK), November 2017, Available at: <http://www.bbc.co.uk/news/uk-4190129>

¹³⁵ Medway Council, 'Medway Council Plan (2016-21)', Available at: <http://www.medway.gov.uk/pdf/Council%20Plan%20201617%20Final.pdf>

Medway Council 'Joint Health and Wellbeing Strategy for Medway (2012-17)', Available at: <http://www.medway.gov.uk/pdf/Joint-Health-and-Well-being-Strategy-for-Medway-2012-2017.pdf>

Thames Gateway Kent, 'Thames Gateway Kent Plan for Growth (2014-20)', Available at: <http://www.tgkp.org/content/documents/TGKP%20Growth%20Plan%20brochure%20%20-%20web.pdf>

Medway Council, 'Medway's Cultural Strategy (2014-19): Rich heritage-great future', Available at: <https://democracy.medway.gov.uk/mgconvert2pdf.aspx?id=25118>

enhance through improving quality and accessibility, and provide for the future through a planned approach, based on robust and up-to-date assessments of need.”¹³⁶ In addition, Sport England’s draft Playing Fields Policy will: “oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.”¹³⁷

10.27 National planning policy also provides for Local Green Space designations during the preparation or review of Local Plans or Neighbourhood Plans. These designations are intended for the special protection of green areas; however this should be “consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.”¹³⁸ As part of this consultation, the council is inviting responses concerning potential Local Green Space designations. Responses will be considered in accordance with national planning policy and guidance.

10.28 In response to the last consultation, Sport England stated: “No sites, including playing fields, should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field.” Table 11.1 below shows which potential site allocations would compromise existing greenspaces, derived from the Ordnance Survey Greenspace dataset.¹³⁹

¹³⁶ Sport England, ‘*Planning for Sport : Forward Planning*’, Available at: <https://www.sportengland.org/media/11054/planning-for-sport-forward-planning-guide-july-2014.pdf>

¹³⁷ Sport England, ‘*Playing Fields Policy and Guidance*’, Available at: <https://www.sportengland.org/media/12130/playing-fields-policy-and-guidance-consultation-draft.pdf>

¹³⁸ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 8, Paragraph 76, pg.17, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹³⁹ Ordnance survey, <https://osmaps.ordnancesurvey.co.uk/51.38922,0.52659,13>

Potential Site Allocation	OS Greenspace Type	Greenspace Name	Explanatory Notes
0050 – Lodge Hill	Playing Field	Lodge Hill Recreation Ground	Lodge Hill Recreation Ground forms part of the Homes England site. Any proposal would need to be in line with the development plan.
0090 – Strood Riverside, Canal Road	Play Space	Watermill Gardens	The proposed Strood Waterfront Development Brief (2017) indicates that Watermill Gardens will be retained and substantially improved with new landscaping and facilities to serve the increased population, including new play equipment, a café, public toilets, a drinking water fountain and seating.
1114 - Driving Range, Street End Road	Golf Course	Chatham Driving Range	Subject to current planning application (MC/17/2767).
1121 - Deangate Ridge, Sports Complex	Golf Course	Deangate Ridge, Sports Complex	Considered to be in poor condition, underutilised and financially unviable. If made available, the sites could accommodate a range of uses, including open space and sports facilities.

10.29 Sport England requires a robust evidence base in order to meet national planning policy. The last open spaces and playing pitch audit, conducted in 2012¹⁴⁰, identified a substantial overall surplus of open space, however this was overwhelmingly attributed to the 'Natural Greenspace' of Strood and the Hoo Peninsula. All other types of open space amounted to a shortfall across Medway, save for a parks surplus in Chatham and Rainham. The same audit identified that some pitches have spare capacity, however there was a need for most other types of sports pitch, particularly for youth football and tennis, although the latter will have been addressed in part following the 2017 opening of the Avenue Tennis centre in Gillingham, providing 17 multi-surface courts. The council is commissioning a new Playing Pitch Strategy in accordance with Sport England guidance and this will form a key part of the evidence base.

10.30 A draft Medway Sports Facility Strategy and Action Plan has been produced providing an assessment of need up to 2035 and setting out a phased approach to planning. It sets out opportunities for improvements in a range of sports facilities

¹⁴⁰ Ploszajski Lynch Consulting Ltd, 'Medway Council (2012) Playing Pitch and Outdoor Sports Facilities Study', Available at: <http://www.plcisureconsulting.co.uk/medway-council-outdoor-sports-facilities-study/>

across Medway. It is possible that existing and new school sports facilities could be made available for community use outside of school hours to help meet demand. Moreover, there could be other innovative ways for the wider policy framework to fulfil the multiple elements of the vision and strategic objectives, for example by linking new school provision to an existing open space.

10.31 The findings of the 2012 open spaces and playing pitch audit and the scale of growth to 2035 underline the need for a strong local policy to protect, enhance and provide for sport and recreation. This will be based on a robust and up-to-date evidence base.

10.32 The scale of growth proposed in the emerging plan will require significant investment in open space and sports provision. Strategic allocations will include provision for new parks, green spaces and sports and leisure facilities.

Policy I6: Open Space and Sports Facilities

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Policy I7: New Open Space Provision

Provision for new open space will be in line with specifically identified needs, informed by a robust assessment. Strategic scale development will be required to provide new greenspaces to meet community needs, and contribute to the quality of placemaking,

Policy I8: New Playing Pitches

New pitches will be provided in line with specifically identified needs, informed by a robust assessment.

Any new playing pitches should be constructed in line with Sport England guidance.

Question I6:

Do the proposed policies for open spaces, sports facilities and playing pitches represent the most appropriate approach for the Local Plan?

What do you consider would represent a sound alternative approach for planning for open spaces, sports facilities and playing pitches in the Medway Local Plan?

Gillingham Football Club

- 10.33 The plan's vision and strategic objectives aim to establish a regional profile for successful and ambitious growth, gain competitiveness, attract investment and secure and enhance the diverse business base in accessible locations.
- 10.34 Gillingham Football Club provides an important strategic role in Medway and a focus for the community. Among other factors, notably the close proximity to London and the Universities at Medway, the football club contributes to the competitive profile of the area, enhancing its ability to attract inward investment. Gillingham is the only football league team in Kent.
- 10.35 National planning policy supports the economic¹⁴¹ and community¹⁴² benefits that can derive from a leading sports facility in Medway. Such ambitions accord with the Council Plan (2016-21) and the Thames Gateway Kent Plan for Growth (2014-20). It is recognised that new stadiums for successful football clubs can have a positive impact for their towns and cities, for regeneration, the local economy, and health, as well as boosting a sense of community pride in the area.
- 10.36 Gillingham Football Club has had longstanding ambitions to relocate to a new purpose built stadium. The existing stadium is contained within a tightly knit urban area. This location limits the club's ability to grow. The ground has capacity for just under 11,000 spectators, and as an ambitious football club it is compromised in achieving its aspirations to emulate the likes of clubs such as Brighton and Bournemouth which have successfully expanded. The constrained urban site also limits the club's ability to provide for non-football related activities on site, which would help with its viability. A wider offer could include education facilities, building on the existing work of the club; sports and associated health activities, such as physiotherapy and sports medicine; leisure and community uses; associated hotel and conference facilities; and provide links to the Universities and further employment uses. Such a strategic development opportunity would have an important role in the economy, community, health and prosperity of Medway.
- 10.37 The council will continue to work with the football club to secure its future in Medway and to develop its strategic and community role. Any proposal should be multi-functional to address any sports or other community use shortfalls to be identified in the evidence base.

Policy I9: Gillingham Football Club

The Council recognises the positive benefits of a successful football club to the Medway community and economy and will work positively with the club to find an appropriate site for

¹⁴¹ Department for Communities and Local Government, 'National Planning Policy Framework', Paragraph 17, pg.5, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁴² Department for Communities and Local Government, 'National Planning Policy Framework', Paragraph 70, pg.17, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

the development of a new stadium with associated facilities that should include education, employment, sports and leisure, community use and hotel and conference facilities. Any proposals must demonstrate the sustainability of the site, include an Environmental Impact Assessment and demonstrate the benefit to Medway as a place to live, work, learn and visit.

Question I7:

Do you agree with the proposed policy for Gillingham Football Club?

Do you support the relocation of Gillingham Football Club to a new stadium in Medway?

Where do you consider would be a suitable location for a relocated stadium?

Question I8:

What uses would you expect to see come forward as part of any new stadium proposals?

SECTION 11

Transport

- 11.1 A sustainable and effective transport network is intrinsic to how places work well, and is a fundamental component of successful growth. Transport is one of the most high profile matters associated with development. Consultation on the emerging Local Plan has confirmed concerns about existing pressures on transport networks and their capacity to accommodate growth. These concerns are substantiated in the technical transport assessments being carried as part of the evidence base for the new Medway Local Plan.
- 11.2 Medway benefits from high levels of accessibility to rail and motorway links, but also experiences congestion and a complex highways network, resulting from its geography and historical pattern of development. Transport provides some of Medway's key opportunities for sustainable growth, but also presents some of the greatest challenges. In planning for a successful University waterfront city by 2035, it is essential that considerations of how people will move around form the core of Medway's growth strategy. This will also inform the character of a revitalised urban centre, with an attractive, accessible and inclusive public realm.
- 11.3 Medway's key location in north Kent brings additional transport considerations. The council is committed to working with transport planning agencies, neighbouring authorities and partnerships to coordinate planning and investment in strategic transport networks. Plans for the Lower Thames Crossing to the east of Gravesend will have impacts for Medway and the local and strategic road network. Developments planned to the east of Medway including Ebbsfleet and the proposed London Entertainment Resort, and associated road schemes are also key considerations. Extensions to rail services and connections, such as Crossrail, form part of the wider transport strategy. Medway's wharves are of regional and national importance. The river defines Medway, and there is much support to open up access and realise opportunities for regeneration. The England Coastal Path will run along the land to the south of the Medway Estuary and around the Hoo Peninsula.
- 11.4 The transport policies have been prepared in accordance with national planning policy and the Medway policy framework,¹⁴³ including the Local Transport Plan

¹⁴³ Medway Council, 'Medway Council Plan (2016-21)', Available at:
<http://www.medway.gov.uk/pdf/Council%20Plan%20201617%20Final.pdf>

Medway Council 'Joint Health and Wellbeing Strategy for Medway (2012-17)', Available at:
<http://www.medway.gov.uk/pdf/Joint-Health-and-Well-being-Strategy-for-Medway-2012-2017.pdf>

Thames Gateway Kent, 'Thames Gateway Kent Plan for Growth (2014-20)', Available at:
<http://www.tgkp.org/content/documents/TGKP%20Growth%20Plan%20brochure%20%20-%20web.pdf>

Medway Council, 'Medway's Cultural Strategy (2014-19): Rich heritage-great future', Available at:
<https://democracy.medway.gov.uk/mgconvert2pdf.aspx?id=25118>

(LTP),¹⁴⁴ which provides the transport strategy for the period 2011 to 2026. The LTP is supported by the Cycling Action Plan (2016-18)¹⁴⁵ and the Public Rights of Way Improvement Plan (2007-17).¹⁴⁶ Responses to previous consultations and the emerging evidence base have informed the scope and detail of the policies.

- 11.5 Transport issues are among the most frequent and contentious issues raised during the previous two consultations on the emerging Local Plan . It is important to note however that planning policies must relate to the development and use of land, while other strategies, including the LTP, will directly deliver improvements to transport.
- 11.6 The council has commissioned a Strategic Transport Assessment (STA) as a key component of the evidence base. It is used to assess the existing situation and determine the transport implications of potential site allocations, providing an understanding of the cumulative and site specific impacts in terms of the capacity of the road network and the associated safety issues. The STA will inform strategic and specific mitigation requirements for sites allocated for development in the Local Plan.
- 11.7 High level modelling indicates that key junctions across Medway and especially in Chatham town centre will exceed capacity by 2035. However, several junctions in Chatham are already exceeding or operating close to capacity. Modelling to date has not included mitigation or sustainable transport initiatives, i.e. it has presented a 'Do nothing' scenario. A strategic approach to joint land use and transport planning will be required to avoid reinforcing unsustainable historic travel patterns and deliver transformative change.
- 11.8 The policies set out below comprise a fundamental approach to the overall Development Strategy, critical infrastructure improvements, travel demand measures and other initiatives concerning the development and use of land. Further evidence base work will determine the range and location for transport facilities to support Medway's growth, including the public transport network, provision for walking and cycling, highways improvements, parking, including consideration of a park and ride facility. These policies will need to be complemented by Transport Assessments, Transport Statements and Travel Plans.
- 11.9 This consultation document presents strategic policies that will contribute to the delivery of the vision and strategic objectives. These policies should also be considered in the preparation of the South East Local Enterprise Partnership's new Strategic Economic Plan, provide a foundation for Medway's participation in Transport for the South East and support Medway's refreshed Regeneration Strategy, Medway 2035.

¹⁴⁴ Medway Council, '*Medway Local Transport Plan 2011-2026*', Available at: http://www.medway.gov.uk/pdf/Local_Transport_Plan_2011-2026.pdf

¹⁴⁵ Medway Council, '*Medway's Cycling Action Plan 2016/18*', Available at: <http://www.medway.gov.uk/pdf/CyclingActionPlan2016-18.pdf>

¹⁴⁶ Medway Council, Movement in Medway, '*Medway's Public Rights of Way Improvement Plan 2007-2017*,' October 2017, Available at: http://www.medway.gov.uk/pdf/public_rights_of_way_improvement_plan.pdf

Policy T1: Promoting sustainable transport

The council will work with the relevant authorities and transport providers to:

- support the Medway Local Transport Plan (2011-26) and subsequent iterations during the plan period, along with the associated three-year Implementation Plans and strategies
- ensure development is located and designed to enable sustainable transport
- mitigate the impacts of new development according to Transport Assessments and Transport Statements, or refuse development where its residual cumulative impacts are severe
- require a Travel Plan for development which will generate significant amounts of movement
- plan for strategic road network and rail improvements
- improve public transport provision and the walking and cycling network
- develop an integrated transport strategy for Medway to deliver sustainable growth
- identify the need for and if required define the location for park and ride facilities.
- engage with the relevant authorities to address the impacts of the proposed Lower Thames Crossing
- undertake any necessary revisions to the adopted Parking Standards
- improve air quality as a result of vehicular emissions

Question T1:

Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?

What do you consider would represent a sound alternative approach towards sustainable transport in the Medway Local Plan?

Integrating Land Use and Transport Planning

11.10 National planning policy states that Local Plans should “support a pattern of development which facilitates sustainable transport.”¹⁴⁷ More specifically, national planning policy states that the “transport system needs to be balanced in favour of sustainable transport, giving people real choice about how they travel.”¹⁴⁸ This is supported by the government’s 2017 Cycling and Walking Investment Strategy, which aims to “make cycling and walking the natural choices for shorter journeys, or as part of a longer journey.”¹⁴⁹

¹⁴⁷ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 4, Paragraph 30, pg.9, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁴⁸ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 4, Paragraph 29, pg.9, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁴⁹ Department for Transport, ‘*Cycling and Walking Investment Strategy*’, 2017, Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/603527/cycling-walking-investment-strategy.pdf

- 11.11 Regeneration is a key element of the vision and strategic objectives for Medway's growth to 2035. With this come opportunities to embed new approaches to transport planning and making the most efficient use of land. Appropriate sites can support higher density development in areas well served by sustainable transport options. Government policy and guidance^{150 151 152 153} supports this approach in boosting housing supply in proximity to rail stations. Linking development with sustainable transport is promoted as an approach to joint land use and transport planning by directing new, mixed use development to areas in close proximity to high-quality public transport. A renewed focus on the pedestrian and public space will enhance the attractiveness of the centre itself and the overall offer. This can reduce the need to travel and retain consumer spending within Medway. There are also potential benefits in reducing air and noise pollution and help in the transition to a low carbon economy. The council supports higher density development, including housing, in central areas within walking distance of the rail stations at Strood, Rochester, Chatham (and its bus interchange), Gillingham and Rainham, where appropriate to the specific site considerations.
- 11.12 It is important to recognise that travel choice is limited in peripheral areas which cannot support a viable bus service and this is a factor in car dependency. These areas may not present practical opportunities to maximise sustainable transport; however, the advent of new technologies, such as the 'ArrivaClick'¹⁵⁴ service operating in Swale, could transform bus services over the next 20 years. Meanwhile, the new rail franchise will be required to trial Pay-As-You-Go ticketing in Medway, such as through an Oyster-type card or Contactless payment card) to ensure ticketing is as seamless as possible.¹⁵⁵ This is a significant development to encourage rail travel in Medway. Initiatives for card travel across all public transport modes are important to improve ease of travel.
- 11.13 The council has analysed accessibility to key stations in Medway and defined zones to provide guidance on potential differentiation of densities to make the best use of land, and meet the vision and strategic objectives of the Local Plan. Further details

¹⁵⁰ HM Treasury, *'Fixing the foundations: Creating a more prosperous nation'*, July 2016, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443898/Productivity_Plan_web.pdf

¹⁵¹ Cities and Local Government Devolution Act 2016, <http://www.legislation.gov.uk/ukpga/2016/1/contents/enacted>

¹⁵² Department for Communities and Local Government, *'Proposed Changes to NPPF (Dec 2015)- Summary of Consultation Responses'*, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/589791/Proposed_Changes_to_NPPF_Dec_2015_-_Summary_of_consultation_responses.pdf

¹⁵³ Department for Communities and Local Government, *'Fixing our broken housing problem'*, February 2017, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

¹⁵⁴ Arriva, <https://www.arrivabus.co.uk/arrivaclick/>

¹⁵⁵ Department for Transport, *'Future of South Eastern Rail Services'*, November 2017, Available at: <https://www.gov.uk/government/consultations/future-of-south-eastern-rail-services>

are set out in the Housing Delivery technical paper supporting this consultation document. The approach is based on four walking zones centred on rail stations¹⁵⁶:

1. Core – within a 5 minute / 400 metre walk
2. Primary – within a 10 minute / 800 metre walk
3. Secondary – within a 20 minute / 1,600 metre walk
4. Periphery – all areas beyond the Secondary zone

11.14 These zones have been used to determine the optimum net residential densities shown in Table 11.1. Chatham will need to achieve the highest density as the city centre, while a restrained approach has been applied to other locations to respect their existing built form and heritage.

Table 11.1 – Optimum net residential densities (dwellings per hectare)

	Core	Primary	Secondary	Periphery
Chatham	275	180	79	35
Strood	180	95	79	35
Gillingham	95	79	79	35
Rochester	95	95	79	35
Hoo St Werburgh	35 (50*)	35 (50*)	35 (50*)	35
Rainham	50	35	35	35

** Indicative for Development Strategy Scenarios 2 and 3 only*

Policy T2: Integrating Land Use and Transport Planning

The council promotes development which supports the use of sustainable transport.

It seeks to realise opportunities for making the best use of land, by promoting higher density mixed use development in areas within close walking distance of the main rail stations (Strood, Rochester, Chatham, Gillingham and Strood) and Chatham Waterfront bus interchange in line with the proposed levels set out at Table 11.1.

Proposals which compromise this policy will be resisted.

Question T2:

Do you agree/disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway?

Question T3:

Research has demonstrated the non-linear relationship between housing density and public transport use. However, in principle, do you agree/disagree that densification is more likely to increase the viability of additional and/or improved public transport services?

¹⁵⁶ Zones are aggregated 2011 Census Output Areas that best fit with walking isochrones

Question T4:

The optimum densities set out at Table 11.1 are likely to be achieved in the absence of this policy due to their central locations. Is it appropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs? For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare? Would it be appropriate to include Cuxton and Halling stations in Table 11.1?

Question T5:

What do you consider would represent a sound alternative approach towards the integration of land use and transport planning in Medway?

Strategic Transport Infrastructure

- 11.15 The vision and strategic objectives for the Local Plan aim to establish a regional profile for successful and ambitious growth, gain competitiveness, attract investment and secure and enhance the diverse business base in accessible locations.
- 11.16 Medway is working with neighbouring local authorities, transport bodies and government agencies in assessing and defining the need for improvements to transport networks, and seeking to secure investments to realise these improvements. The council is engaged with Highways England by sharing growth data and traffic modelling outputs in order to understand and plan for the proposed Lower Thames Crossing. In addition, the council has submitted an ambitious expression of interest bid in response to the government's Housing and Infrastructure Fund (HIF).
- 11.17 The HIF aims to support the preparation of Local Plans by unlocking land which would otherwise be unavailable for development due to a lack of infrastructure. The HIF Forward Funding stream is intended for strategic, high-impact infrastructure schemes, which could provide a significant proportion of upfront development costs, intended to create confidence and instigate further private and public sector funding. The development of a small rural town on the Hoo Peninsula and extended employment areas depend on strengthened connections and significant upgrades to transport. This was reflected in the HIF bid which identified road improvements and the reinstatement of passenger services. The council has included a development strategy option that responds to the specific opportunities that would arise from such strategic infrastructure investments.
- 11.18 The council received responses calling for the reinstatement of passenger rail services during previous consultations, while members of the public frequently raised the potential role of the line with planning officers at public exhibitions. The Kent Community Rail Partnership also supports a passenger rail connection for Hoo.
- 11.19 The principle of a rail upgrade to the Grain freight line providing for passenger services is supported throughout the council's policy framework, and the Medway 2035 regeneration strategy. A rail connection for passengers would not only relieve

local congestion; it would provide a focus for the community and bring about a step-change in travel behaviour. Moreover, it would:

- underpin a wider strategy in conjunction with exemplary approaches to design and green infrastructure;
- address negative perceptions, provide the means to create a higher value offer and make a significant contribution to an aspiring brand for the Hoo Peninsula and Medway; and
- serve an improved employment offer at Kingsnorth and allow for increased rail freight.

11.20 Following the withdrawal of passenger services in 1961, the Grain freight line continues to facilitate the import/export of aggregates, along with rail freight associated with the aviation fuel storage depot and Thamesport activity. However, the line is currently underutilised, prompting the council to emphasise its potential role in making the Hoo Peninsula a sustainable location for growth in response to Network Rail's recent consultation. Network Rail will highlight the potential of the Grain freight line in the forthcoming Kent Route Study, setting out investment options for the next 30 years.

11.21 Many commuters from the Hoo Peninsula currently drive from villages to stations at Strood, Gravesend or Ebbsfleet; with the scale of growth forecast, a continuation of this commuting pattern is not sustainable or desirable. This commuting adds to pressure on the A228 on the Hoo Peninsula, and congestion contributes to the air quality issues at the designated Area Quality Management Area at Four Elms Hill. Further analysis of commuting patterns is set out in the Transport technical paper supporting this consultation.

11.22 Successful HIF bids will receive access to funds to develop a business case in 2018. The prime location for a new rail station and any supporting infrastructure will need to be identified in a business case, along with the need to upgrade road and rail bridges. Train services will need to be compatible with freight activity, while Network Rail are considering the potential to extend an existing service from Gravesend, providing a direct service to London. A positive response from the government will help to ensure that the Hoo Peninsula is a sustainable location for growth.

11.23 The government has described its strategic vision for rail,¹⁵⁷ including commitments to expand the network to boost housing and economic growth, reinforce the importance of rail freight to support the economy and the environment and to explore opportunities to restore routes withdrawn during the 1960s and 1970s. The government is inviting new, innovative proposals based on a strong business case. This suggests that there will be further opportunities to seek government funding in the short to medium term if the HIF bid is unsuccessful.

¹⁵⁷ Department for Transport, *'Connecting people: A strategic vision for rail'*, (Nov 2017), Available at: <https://www.gov.uk/government/publications/a-strategic-vision-for-rail>

Policy T3: Hoo Peninsula rail connection

The council intends to safeguard land for new rail infrastructure, including a station, route alignment and buffer stop zone. Proposals which compromise this policy will be resisted.

Proposals which demonstrate consistency with the Hoo Development Framework and any subsequent masterplans will be encouraged.

The council will work with strategic transport bodies and wider partners to seek investment in providing new passenger rail services on the Hoo Peninsula.

Question T6:

Do you support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight?

The council welcomes responses indicating areas of land to be safeguarded. This information could be considered in a business case, subject to funding.

What alternative approaches would you suggest?

Aviation

11.24 A core principle of national policy is that planning should “proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.”¹⁵⁸ In order to deliver sustainable development, under the policy theme of economic growth, Local Plans should “plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.”¹⁵⁹ Under the policy theme of sustainable transport and specifically in relation to airports and airfields, the government requires plans to “take account of their growth and role in serving business, leisure, training and emergency service needs.”¹⁶⁰

11.25 The government consulted on a new UK Aviation Strategy in 2017 to help shape the long-future of the sector.¹⁶¹ The new strategy will focus on economic growth, regional connectivity and skills. There will be further rounds of consultation in 2018, with the final strategy expected to be published by the end of 2018.

¹⁵⁸ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Paragraph 17, pg.5, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁵⁹ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 1, Paragraph 21, pg.6, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁶⁰ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 4, Paragraph 33, pg.10, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁶¹ Department for Transport, ‘*Government sets out vision for future of UK aviation*’, July 2017, Available at: <https://www.gov.uk/government/news/government-sets-out-vision-for-future-of-uk-aviation>

- 11.26 Rochester Airport is a general aviation facility catering for leisure, business, training, heritage and emergency service uses. It requires investment to secure its medium to long-term future. The Council Plan (2016-21) highlights the role of Rochester Airport in creating a strong, diversified economy with job opportunities for Medway residents. The council approved the Rochester Airport Masterplan in January 2014¹⁶² to provide a strategic gateway and an economic hub.
- 11.27 The masterplan proposes to remove one of the two grass runways and construct a new hard-surfaced runway with improved facilities, while the adjoining land will capitalise on opportunities to create skilled employment opportunities as part of its Enterprise Zone status within the North Kent Innovation Zone. There are no plans to transform the facility into a commercial airport, with regular scheduled and/or chartered passenger flights, and the operations will be subject to conditions to mitigate and manage impacts on the environment and amenity.
- 11.28 There is a small aviation operation at Stoke on the Hoo Peninsula. The Stoke facility, which primarily caters for microlights, is limited in scale and constrained by high voltage power lines and other features. It is not proposed to safeguard this facility.

Policy T4: Rochester Airport

Rochester Airport will be safeguarded to provide an enhanced aviation facility for business, public service, training, heritage and leisure uses, and support the development of a strategic gateway and an economic hub.

Proposals will need to demonstrate how any impacts will be mitigated, including air quality, noise, traffic, and amenity.

Question T7:

Do you agree with the proposed policy for aviation in Medway?

What alternative approach would you propose for planning policy for aviation in Medway?

Riverside Infrastructure

- 11.29 The River Medway is a key asset, providing a strong sense of place and identity. It is highly visible from some areas, particularly from public areas of the waterfront and areas of higher ground. However, in some areas it is less accessible due to historic military and industrial uses. Historically the river has played a functional role in the transportation of goods to wharves, reflecting the area's manufacturing and industrial heritage. Some of this activity continues today, such as on the Medway City Industrial

¹⁶² Medway Council, 'Rochester Airport', (ME DWAY.GOV.UK), Available at: <http://www.medway.gov.uk/businessandinvestment/medwayregeneration/rochesterairport.aspx>

Estate. The waterfront areas are characterised by the infrastructure associated with a range of economic activities, from aggregates importation to marine engineering and leisure activities. The river represents an important transport corridor for commercial and leisure traffic.

- 11.30 National planning policy requires Local Plans to “support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.”¹⁶³ In addition, national policy requires Local Plans to safeguard existing, planning and potential infrastructure, including wharfage, for the transport of minerals, including recycled, secondary and marine-dredged materials.¹⁶⁴ However, national policy also stipulates that plans should “avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”¹⁶⁵
- 11.31 The 2015 North Kent Strategic Housing & Economic Needs Assessment (SHENA) highlighted the regional connections through road, rail and waterfront logistics sites as influential factors in business location and the labour market.¹⁶⁶ Furthermore, the SHENA found that energy and water industries are relatively strong in Medway compared to local, regional and national comparators.¹⁶⁷ A response to the last consultation suggested that the policy approach for economic development places too much emphasis on ‘higher value employment’, however this should not overlook some of Medway’s existing strengths, such as manufacturing and opportunities for port and wharf related activities. The Employment Land Needs Assessment (ELNA), commissioned as part of the SHENA, noted that Medway has significant space for

¹⁶³ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 1, Paragraph 21, pg.6, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁶⁴ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 13, Paragraph 143, pg.32, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁶⁵ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 1, Paragraph 22, pg.7, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁶⁶ Gravesham Borough Council and Medway Council, ‘*North Kent Strategic Housing and Economic Needs Assessment*’, para 5.1, March 2015, Available at:

<http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf>

¹⁶⁷ Gravesham Borough Council and Medway Council, ‘*North Kent Strategic Housing and Economic Needs Assessment*’, para 5.10, March 2015, Available at:

<http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf>

businesses reliant on available wharfage sites.¹⁶⁸ Some existing units located on Medway City Estate – one of the largest employment centres in Medway – benefit from active wharfs¹⁶⁹, understood to involve the importation of timber. The ELNA recommended that the ‘Medway City Peninsula – Wharf/Specialist industry use’ should be protected and maintained, along with vacant land at Kingsnorth and Isle of Grain with potential for wharf users.¹⁷⁰ The ELNA also provided advice concerning the future of the Chatham Docks site.

11.32 The predominant stock quality of the Chatham Docks site was considered mixed or good, currently in B-class use for construction, marine, engineering, materials processing, warehousing and storage activities.¹⁷¹ The ELNA considered that there are a range of possibilities to increase employment capacity on this site, which were at the time of the survey either vacant or underutilised.¹⁷² The facility is understood to cater for smaller vessels and this may continue to complement larger ports and handle vessels too large for other local facilities. Chatham Docks forms part of the Peel Ports’ London Medway cluster, along with the Sheerness Port.¹⁷³ In response to the last consultation, Peel Ports highlighted the promotion and implementation of a 20-year masterplan with substantial investment for Sheerness Port and that this is considered to adequately serve businesses in Medway. The response stated that “the emerging plan should therefore not seek to safeguard the future of Chatham Dock as employment land or an operational commercial port facility.”

11.33 Peel Ports have also responded to the Strategic Land Availability Assessment (SLAA), indicating that the Chatham Docks site has a potential capacity of 2,577 new homes, likely to be flatted development. This has been incorporated as a potential site allocation (phased later in the plan period), given the regeneration agenda and the presence of St Mary’s Island to the west and development under construction to

¹⁶⁸ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 6.8, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁶⁹ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 7.22., December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷⁰ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, Table 27, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷¹ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 7.4 and 7.12, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷² GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 7.17, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷³ Peel Ports Group, ‘The quay to international trade’, available at: <https://www.peelports.com/ports/london-medway>

the east. The redevelopment of the remainder of Chatham Docks would provide an opportunity for a continuous riverside path and this is considered to be central to the vision and strategic objectives of the new Local Plan. However, a key finding of the SHENA noted that the private market is dominated by homes aimed at smaller households, including newer waterfront flats.¹⁷⁴ These house types should be directed to the core accessibility zones in the first instance, given that the Chatham Docks site is peripheral and likely to be car dependent, unless significant transport upgrades are introduced. The scale of such proposed growth would justify such transport improvements. The exact recommendations of the SHENA and ELNA are unlikely to be compatible with a residential led, mixed use development. It is however conceivable that the Chatham Docks site can potentially deliver on multiple, rather than competing, elements of the vision and strategic objectives.

11.34 The new Local Plan should not overlook the potential for innovative approaches to these land uses to emerge in future, such as multi-storey warehouses¹⁷⁵, while the disused line to Gillingham station could provide a bespoke sustainable transport solution. It is considered that the potential site allocation should be regularly reviewed in line with national planning policy.

11.35 A network of piers, jetties, slipways, steps and stairs are interspersed along the urban stretches of the river, although some facilities are in a poor state of repair. The council supports the potential for new services on the river to complement the regeneration and tourist attractions along the waterfront, therefore the retention of and access to wharves and public piers will be promoted. However these need to meet the requirements of conserving the important environmental features of the designated river and estuarine habitats. The introduction of a new river crossing could facilitate sustainable transport and address the restrictions that apply to pedestrians and cyclists who are unable to use the Medway Tunnel, as well as meeting regeneration ambitions.

Policy T5: Riverside Infrastructure

This policy intends to reinforce Medway's strategic location in the Thames Gateway. Ports and wharfage will be safeguarded in order to support existing business sectors and to attract businesses requiring such facilities.

The allocation of Chatham Docks for mixed use development will be regularly reviewed, taking account of market signals and development needs. Innovative, mixed use proposals for this strategic site will be encouraged. The Council will require bespoke sustainable transport solutions, including the assessment of the re-use of the disused line from the docks as a link to Gillingham station.

¹⁷⁴ Gravesham Borough Council and Medway Council, 'North Kent Strategic Housing and Economic Needs Assessment', para 4.54, March 2015, Available at:

<http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf>

¹⁷⁵ The Financial Times, <https://www.ft.com/content/26036984-e7cd-11e6-893c-082c54a7f539>

Riverside infrastructure associated with the transport of minerals, waste and other defined materials will be safeguarded in accordance with national planning policy.

The existing network of piers, jetties, slipways, steps and stairs will be safeguarded to support the potential for visitor and river taxi services and to accommodate visiting vessels, while any new facilities will be encouraged.

Riverside infrastructure will be required to comply with the requirements of conserving the designated environmental features of the estuaries and river. Development must demonstrate that there will be no loss of protected or priority habitats or species, unless the impacts are not significant at a waterbody scale, and can be adequately mitigated for.

Question T8:

Do you agree with the proposed policy for riverside infrastructure in Medway?

Question T9:

Do you consider the flexible approach to Chatham Docks to be appropriate?

Question T10:

What alternative approach would you propose for planning policy for riverside infrastructure in Medway?

Riverside Path

- 11.36 The River Medway is a defining feature of the area, providing a strong sense of place and identity. The local character of the river and its edges varies along its length, from extensive areas of intertidal habitat to historic military uses and industrial facilities. A series of spectacular meanders, framed by steep escarpments, create the opportunity for stunning views and connections between the urban quarters. It also provides opportunities for sport and recreation, however access is restricted in some areas due to historic military and industrial uses, and environmental constraints.
- 11.37 Responses to previous consultation on the emerging Local Plan generally supported the proposed vision which highlights the river itself and its strategic role. A strong emphasis on the river can help to deliver multiple elements of the vision, strategic objectives and wider policy outcomes.
- 11.38 The urban waterfront is a focus of the regeneration agenda and the delivery of quality public spaces. A riverside path or boardwalk will establish new infrastructure that inspires place-making and how people move around the area. A defined route would be a draw for residents and visitors, linking key heritage sites, stations with town centres, the Universities and work places, supporting healthier lifestyles and cultural activities. It would be a focus for quality public spaces in shaping the modern waterfront city. The highest quality place-making standards will be realised along the urban waterfront, with public spaces as focal points, and increased access to the

riverside and the river itself. Where appropriate, this will align with the route of the England Coastal Path that runs along Medway's frontage with the river and estuaries.

Policy T6 – Medway Riverside Path

The council intends to maximise the potential of the River Medway and its edges as a strategic priority.

Waterfront development proposals will incorporate public space to facilitate walking and cycling and demonstrate the highest design standards, including Sport England's Active Design guidance.

Proposals will need to demonstrate how any impacts will be mitigated.

Question T11:

Do you agree with the proposed policy for a riverside path in Medway?

What alternative approach would you propose for planning policy in Medway?

Marinas and moorings

11.39 Marine leisure activities primarily consist of yachting and motor boating facilities along the middle and upper reaches of the river, largely away from conflict with the commercial activities elsewhere. A marina is a dock or basin with moorings and supplies for yachts and small boats. It can include activities such as boat sales, repair facilities, chandlery, boat storage, club house and parking. It is effectively a small port that is used for pleasure rather than trade, often with hotels, restaurants and bars ancillary to the main function. Marinas therefore have a very urban appearance and will generate a significant amount of vehicular movement, which could lead to traffic congestion. Rural areas are therefore not preferred locations for marinas. Within or adjoining an existing built-up area, however, a marina can, if well designed, be a positive asset. Where existing or historical facilities are located in smaller settlements or rural areas it may be appropriate to support the development of larger or more permanent marina facilities in the context of this policy.

11.40 Existing marinas operate at or close to full capacity. Facilities for visiting vessels are currently limited, but there is significant potential for growth. It is recognised that better co-ordination between marina operators would improve Medway's leisure boating offer. Evidence at the South East regional level indicates that there is a shortfall of marina provision along the North Kent coast between Ramsgate harbour and facilities around the Medway Estuary.

11.41 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, river access to shore facilities and attractions requires improvement.

- 11.42 Moorings can have a negative impact on the landscape of the waterway. Urban locations, marinas and sites used historically for the function would be appropriate for permanent moorings. In other areas recreational boat users require short stay or overnight moorings necessitating only mooring posts and public footpath access in order to limit the impact on the waterways and natural and marine environment. The development of moorings, other than overnight stays, will be judged on their merits, having regard to their impact on the landscape, access, parking and cumulative provision.
- 11.43 Residential houseboat moorings occupy areas that could be utilised for additional marina berthing. Many of the houseboats have limited facilities and can create negative environmental impacts. This is considered in the Housing section.

Policy T7: Marinas and moorings

Proposals for marinas and permanent moorings will be permitted where:

- It will meet a proven need
- In an urban location, it is supported by the provision of other commercial leisure uses at an appropriate scale without undermining the role of centres and their vitality and vibrancy
- Required for the proper functioning of an existing facility or to enhance and improve access to the waterway
- Will not have a significant adverse impact on transport network
- Will not result in increased flood risk further downstream or elsewhere
- Will not conflict with neighbouring uses, have a significant adverse impact or result in unacceptable environment consequences. A detailed HRA may be required.
- Provision of access, servicing and car parking is made in a form that will not adversely impact on amenity particularly with regard to the waterways
- The site has adequate land-based utility infrastructure and support facilities including sewage, waste, water, secure storage and washing

Proposals will be required to demonstrate careful consideration with regard to the Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest and the Marine Conservation Zone. Developments will need to adhere to the council's policy for the North Kent Strategic Access Management and Monitoring Scheme.

Question T12:

Do you agree with the proposed policy for marinas and moorings in Medway?

What alternative approach would you propose?

Urban Logistics

- 11.44 Wider changes in retailing and logistics have created a new demand for industrial land in urban areas. Products ordered online are rarely delivered from the central warehouse to customers' doors; they need to be consolidated before the 'last mile' delivery is completed by couriers. However, the pressure to deliver housing has reportedly resulted in significant losses of industrial land across the country. Research estimates that Britain and Ireland need five times more new logistics space

each year than what is being built.¹⁷⁶ New approaches to warehousing are also emerging.

- 11.45 The SHENA highlighted the rising demand for logistics space in the Thames Estuary Corridor. As one of the largest conurbations in the South East, in Medway is reportedly an area of significant interest for logistics operators given the large population and manufacturing sector requiring distribution.¹⁷⁷ However, the SHENA noted that Medway has underperformed in this sector, with areas either side of the Dartford Crossing traditionally more attractive, in part due to the lower suitability and availability of sites.¹⁷⁸ However, the sector has seen recent expansion with new activity, such as London Medway Commercial Park, a major new facility at Kingsnorth. Furthermore, the proposed Lower Thames Crossing is likely to increase demand for sites in Medway, creating new employment opportunities.¹⁷⁹¹⁸⁰ This is despite the latest Medway Authority Monitoring Report revealing a net loss of 3,395 sq m storage and distribution (B8) floorspace,¹⁸¹ in line with the national trend.
- 11.46 These structural changes to economic sectors and the way areas need to function present new challenges for local planning policy. It is nonetheless a national requirement that Local Plans should “proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.”¹⁸² The potential for increased use of modular construction offers opportunities for related factories in Medway. Areas such as expanded employment land near Kingsnorth could provide suitable sites from which to service the local housebuilding industry and minimise the impact on the national, regional and local highway network.
- 11.47 The logistics sector is likely to prefer sites in close proximity to main roads, providing convenient and economic access to urban areas. Such locations are more likely to support the use of low emission vehicles due to their limited range and this would

¹⁷⁶ Colliers International, quoted in The Planner (February 2018)

¹⁷⁷ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 2.62, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷⁸ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 2.63, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷⁹ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 2.65, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁸⁰ Gravesham Borough Council and Medway Council, ‘North Kent Strategic Housing and Economic Needs Assessment’, para 5.109, March 2015, Available at: <http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf>

¹⁸¹ Medway Council, ‘Medway Authority Monitoring Report 2016-17’, Vol. 1, p.28, Available at: <http://www.medway.gov.uk/pdf/Vol1AMR2017FINAL.pdf>

¹⁸² Department for Communities and Local Government, ‘National Planning Policy Framework’, Paragraph 17, pg.5, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

help to address poor air quality in central areas. As part of this consultation, the council is inviting responses concerning the potential allocation of new sites for storage and distribution. Responses will be considered in accordance with national planning policy and guidance.

Policy T8: Urban Logistics

This policy will support the logistics sector to develop in Medway and encourage efficient courier distribution, likely to be a significant source of local traffic congestion.

The loss of existing B8 (storage or distribution) uses will be resisted, unless it can be demonstrated that the site is no longer suitable for this activity, for example due to amenity issues.

This policy only applies to premises under 500 sq m if and when temporary permitted development rights are removed under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the change of use to B1 business and C3 residential use.

Question T13:

Do you agree with the proposed policy for planning for logistics in Medway?

This is believed to be the first local planning policy of its kind. It has been prepared in response to recent sector articles calling for planning policy interventions. The council would welcome responses to refine or develop an alternative policy to support the growth of this sector in Medway.

What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?

Connectivity and Permeability

11.48 The vision for Medway emphasises connections through effective transport networks, while the strategic objectives underline the role of design to deliver an accessible city where people can move around safely. These are also important elements of the Medway policy framework.

11.49 The government recognises the role of the planning system in “*facilitating social interaction and creating healthy, inclusive communities.*”¹⁸³ Local planning policies are expected to aim for places which promote “*opportunities for meetings between members of the community who might not otherwise come into contact with each other ...*” and “safe and accessible developments, containing clear and legible

¹⁸³ Department for Communities and Local Government, ‘National Planning Policy Framework’, Section 8, Paragraph 69, pg.17, 2015 Available at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.”¹⁸⁴

- 11.50 The multiple benefits of walking and cycling for individuals and the community are well documented and promoted, for example through the Living Streets campaign, not least in terms of addressing various public health, environmental and economic issues as a result of traffic congestion.¹⁸⁵ Research suggests the lack of attractive routes and perceptions of crime are factors that deter walking.¹⁸⁶ The same is likely to apply to cycling.
- 11.51 Individual and household travel choices are complex; however certain forms of street layout are more likely to facilitate walking and cycling. The diagrams below compare forms of development which are more conducive to driving (A) and walking and cycling (B).

Figure 11.2 - Car dependent (A) versus walkable street layouts (B)



Source: CLG and DfT, *Manual for Streets* (2007)

- 11.52 Moreover, networks of multi-functional green spaces, along with increased riverside access and river crossings and the conversion of disused infrastructure will have a crucial role in making locations sustainable.
- 11.53 Due to the way in which development will be built out over time, it is crucial that proposals demonstrate careful consideration of every opportunity for connections to integrate with adjacent areas, whether existing or likely to come forward in future. ‘Filtered permeability’, or the separation of vehicle traffic from other favourable routes

¹⁸⁴ *ibid* 183

¹⁸⁵ Living Streets, ‘*Making the Case for Investment in the Walking Environment*’, Available at, <https://www.livingstreets.org.uk/media/1392/making-the-case-summary-final.pdf>

¹⁸⁶ The Guardian, ‘*Unhealthy Britain: half of adults walk less than a mile a day – survey*’, (GUARDIAN.CO.UK), <https://www.theguardian.com/society/2017/may/26/unhealthy-britain-half-of-adults-walk-less-than-a-mile-a-day-survey>,

for public transport, walking and cycling, may offer an appropriate solution in some circumstances.

- 11.54 These principles are also important factors for specific groups. For example, a legible environment, incorporating hierarchy of street types, including short and narrow streets, has been emphasised in urban design guidance to help people living with dementia to lead an active and independent life for longer.¹⁸⁷

Policy T9: Connectivity and Permeability

Proposals must demonstrate how the street layout will promote connectivity and permeability.

Masterplans and/or Design and Access Statements must demonstrate how the proposed street layout will promote ease of movement along safe routes and integrate with adjacent built-up areas. The external connectivity and internal permeability of new development proposals will require careful consideration. Development will be expected to be integrated with the public realm and public transport, in particular ensuring that local facilities and services are easily accessible by foot or bicycle.

The council will seek to expand the network of safe pedestrian and cycle routes to ensure that areas dedicated to vehicular circulation are designed with pedestrian safety and needs of vulnerable groups in mind.

Proposals which highlight design features for vulnerable groups will be encouraged.

Question T14:

Do you agree with the proposed policy for connectivity and permeability in Medway?

What alternative approach would you propose for planning for connectivity in Medway?

Vehicle parking

- 11.55 The Council's current Parking Standards (second edition, adopted 2004)¹⁸⁸ sets out the non-residential parking requirements according to the proposed floorspace of new development. Revised residential car parking standards were issued in 2010. The minimum number of spaces required increases in relation to the number of bedrooms per dwelling. Reductions in the number of parking spaces are considered in urban areas with access to public transport.

- 11.56 National policy (NPPF paragraph 39) requires local planning authorities to consider a number of factors, such as access to public transport, if setting local parking

¹⁸⁷ RTPI- Mediation of space-making of place, '*Dementia and Town Planning- Creating better environments for people living with dementia*', Jan 2017 Available at, http://www.rtpi.org.uk/media/2213533/dementia_and_town_planning_final.compressed.pdf

¹⁸⁸ Medway Council, '*Parking Service Standards*', Available at: <http://www.medway.gov.uk/parkingandtransport/parkingservicestandards.aspx>

standards. However, this has been qualified by a written statement to Parliament, dated March 2015, which referred to the Government's revised, market-led approach to determine if additional parking spaces should be provided, having abolished maximum parking standards in 2011. The following text supplements paragraph 39 of the NPPF:

"Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network."

- 11.57 The council's new strategic transport model and wider evidence base will demonstrate where it is necessary to manage the local road network.
- 11.58 It is recognised that a reduction in the number of parking spaces may present an appropriate measure for some schemes as part of a wider strategy and to promote sustainable transport. The council is exploring the alternative approaches to car parking provision in some circumstances, such as high density development in close proximity to train stations. The final approach would provide a robust basis for any revisions to the current Parking Standards.
- 11.59 Along with the overall quantity, it is important to consider where car parking is accommodated in relation to the home and the street. It is generally accepted that the most desirable streets are dominated by lined trees with cars parked in the street, either parallel to the pavement or at an angle, providing a buffer for pedestrians. In contrast, cars often dominate the street scene of cul-de-sacs developed since the 1960s.
- 11.60 More recently, car parking is often placed to the rear of houses in parking courts. Parking courts are designed with the intention to reduce the visual impact of cars, maintain the overall required number of parking spaces and enable the free movement of vehicles. The streets in such developments are often relatively narrow to reduce construction costs. However drivers often choose to park on the street in front of houses, where there may be better surveillance. This can lead to instances of vehicles parking with two wheels on the pavement and impacting on the public realm and pedestrian safety.
- 11.61 There are further disadvantages to parking courts, including the inefficient use of land to accommodate parking, smaller rear gardens, lack of surveillance and residents preferring to use their rear door, resulting in a loss of street activity. 'Home zones' have been advocated to encourage more street activity through the integration of play, socialising and car parking. Such designs often incorporate traffic calming measures, signage, public seating, planting and street surfacing to promote uses in addition to vehicle movement.
- 11.62 Research indicates that the allocation of parking spaces can be inefficient.¹⁸⁹ Car ownership depends on dwelling type and tenure, therefore the allocation of most

¹⁸⁹ English Partnerships, 'The National Regeneration, Quoted in English Partnerships, 'Car Parking: What Works Where' (2006), Available at: https://www.ipswich.gov.uk/sites/default/files/ncd42_-_car_parking_what_works_where.pdf

parking spaces will inevitably lead to households with too few or too many spaces. Visitors are more likely to require parking during the evening and at the weekend. There are times when demand for visitor parking coincides with the highest demand for residents' parking, such as evenings. At such times, there may be insufficient capacity and result in pressures on spaces and incidences of inappropriate parking.

- 11.63 Furthermore, in addition to a private car, some households may also need to park a commercial van. Some parking spaces may not be designed to accommodate larger vehicles and this can also lead to dangerous parking practices.
- 11.64 Car club membership is seen as a measure to significantly reduce car parking provision. Residents have access to discounted car hire, which can be secured through planning condition. This can be practical where residents rely on public transport for commuting, but require a car for occasional and affordable use.
- 11.65 It is recognised that there is no single solution to vehicle parking provision; developments are likely to use a combination of measures, depending on residential density, proximity to public transport and market conditions.

Policy T10: Vehicle Parking

Planning applications for residential and non-residential development will be determined in accordance with the adopted Parking Standards.

For predominantly residential development, Design and Access Statements must demonstrate how vehicle parking adheres to the following design principles:

- formal parking bays as part of the carriageway, indicated by clear road markings or surfacing
- access to vehicles should be from the front of the property
- avoid parking within the front curtilage of the property where appropriate
- well surveyed
- planting to soften the impact of vehicles
- establish 'home zones' where appropriate
- accommodate parking for larger, commercial vehicles
- accommodate parking for Blue Badge holders in suitable locations
- accommodate dedicated spaces for car club membership where appropriate
- accommodate electric and other ultra-low emission vehicle parking

In line with national policy and guidance, the council will seek opportunities to improve the quality and, where appropriate, the quantity of parking in town centres. In addition, the strategic management of public car parking, as set out in the LTP, will support the vitality of town centres.

Cycle parking and storage

- 11.66 Cycling is recognised for the contribution it can make as a sustainable and healthy form of transport for trips within our towns and between rural communities. To support this, the council is committed to providing measures that make the choice to cycle a more natural one. The cycle network and associated infrastructure, including cycle parking, are essential to encourage cycling as a viable means of transport.
- 11.67 In the case of new developments and re-developments, good quality cycle parking should be designed in from the outset and not introduced as an afterthought. Cycle parking must be easy to use and accessed by all members of the community at all life stages and the need to lift or drag the bicycle at any time should be designed out of all new parking layouts.
- 11.68 Cycle parking should always give cyclists the confidence that their bicycle will still be there upon their return and therefore, racks or other support systems should be conveniently sited and provide good security. Cycles are generally expensive goods. Parking and storage facilities that rely on the securing of wheels are unlikely to provide effective deterrents against theft or damage. It is much easier to remove cycle wheels without the need for tools. Cyclists are not likely to use communal cycle stores with limited security, and this could lead to storing cycles inside properties and/or on balconies, which can impact on amenity.

Policy T11: Cycle parking and storage

Development proposals will be expected to comply with the cycle parking standards in accordance with the council's adopted Parking Standards.

Long term cycle parking facilities for residents, visitors and/or employees of the development must be conveniently located; safe to use; secure; weatherproof; and be well integrated into the building and/or layout of the site.

Short term cycle parking facilities should be conveniently located in relation to the public realm, provide effective security for cycles and be safe to use.

For dwelling houses, individual provision should be made within the private garden area. For flatted developments and commercial uses, communal cycle stores should be provided in individual cages or containers, in very secure locations where access is restricted to residents. In the event that internal space constraints mitigate against providing on-site provision, the Council may seek contributions from the developer towards secure on-street residential parking or maintenance of strategic cycle routes throughout the Borough; where appropriate.

Managing the transport impact of development

- 11.69 The integration of land use and transport is a key element of sustainable development. The NPPF recognises that developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The council uses its influence as a highway and traffic authority to promote public transport, walking and cycling as alternatives to the private car, so that development is easily accessible by a range of transport options.
- 11.70 New developments or intensification of existing uses can have a detrimental effect on the transport network by generating additional traffic or by placing additional burden on public transport. In addition, vehicular access should not cause a road safety hazard or delays to other road users. This draft policy would therefore be in general conformity to the NPPF, which states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 11.71 The council expects proposals that will generate a significant amount of movement to be supported by a Transport Assessment (TA). The council has adopted guidance¹⁹⁰ for TAs which promotes the use of its new traffic model, recently validated by Highways England. The potential advantages may result in a more efficient planning process, leading to increased confidence, reduced costs and higher quality developments. This will also help to ensure that the council can effectively plan for growth.
- 11.72 Travel Plans will be required for residential developments and workplaces above a specified threshold. A Travel Plan should set out measures that a proposed over the longer term that will be taken to give rise to the use of more sustainable modes of transport.
- 11.73 The need for TAs and Travel Plans for mixed use developments, where individual uses fall below the threshold, will be assessed on a case-by-case basis. The measures set out in Travel Plans should be put in place as early as possible with a new development, so that people can benefit from a choice of transport, and develop sustainable travel patterns.
- 11.74 The council has guidance for the construction of vehicular access from the highway and crossovers (dropped kerbs) will not be permitted in areas where they would cause a road safety hazard.

¹⁹⁰ Medway Council, 'Transport Assessments Guidance Note', January 2018, http://www.medway.gov.uk/pdf/Guidance%20Note_Transport%20Assessments_v11.pdf

Policy T12: Managing the transport impact of development

Transport Assessments

The council expects proposals that will generate a significant amount of movement to be supported by a Transport Assessment.

Applicants are encouraged to refer to the adopted Guidance Note for Transport Assessments.

Travel Plans

Travel Plans will also be required for developments above threshold sizes, specified by the council.

Vehicular Crossovers

Developments, including those that require new or additional crossovers, will need to demonstrate that the proposal would not cause a road safety hazard to vehicle occupants, cyclists and pedestrians.

Question T15:

Do you agree with the proposed policy approaches for managing the transport impacts of development and provision for parking?

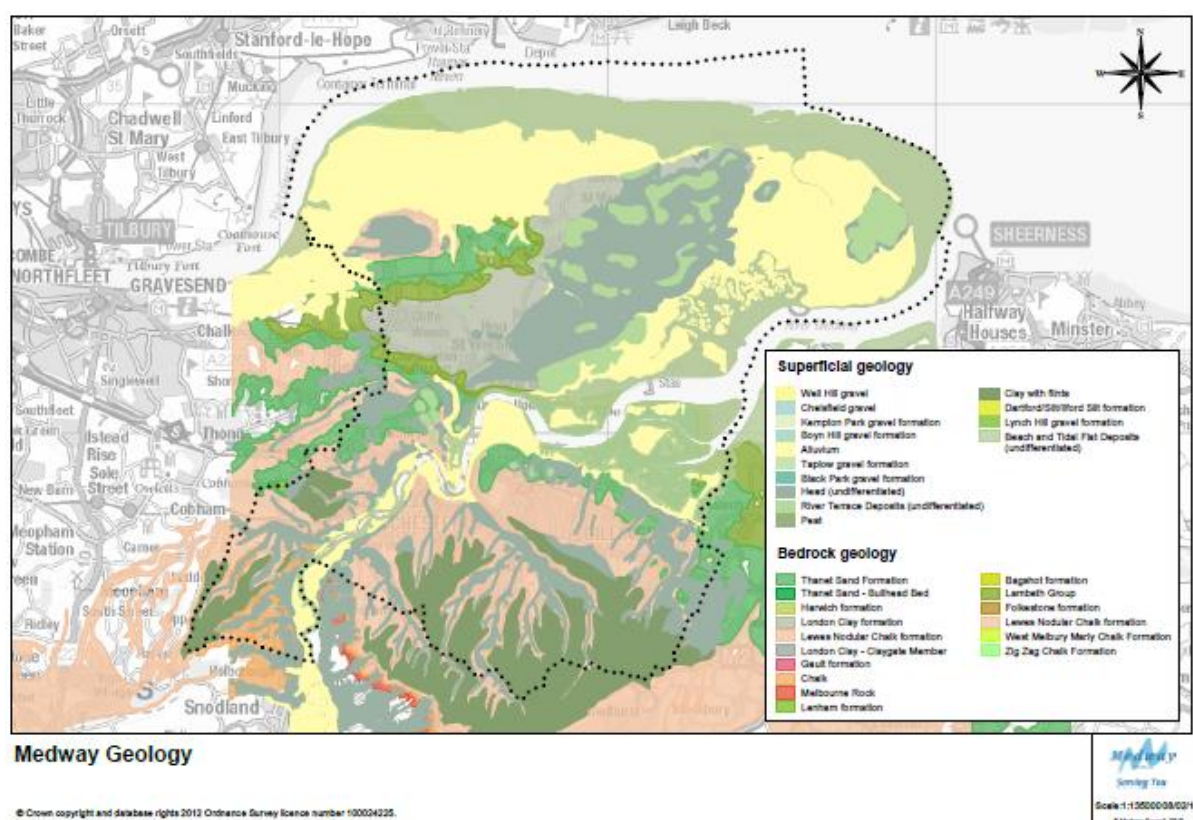
There may be opportunities to secure a ‘dockless’ bike sharing scheme in Medway, however this is likely to be initiated by the market. This may be appropriate for specific routes, such as to/from Chatham rail station and the university campuses. Would it be prudent to seek to manage this through planning policy?

What alternative approaches would you propose for policy in the new Medway Local Plan?

MINERALS, WASTE AND ENERGY

Minerals

12.1 As a Minerals Planning Authority, Medway Council has the responsibility to produce planning policies for the management of minerals to ensure that there is a steady and adequate supply to meet local needs and contribute to regional requirements. The geology in Medway includes deposits of chalk, clay and sand and gravel, much of which is located on the Hoo Peninsula.



Policy MWE1: Minerals Supply

The council will plan for a steady and adequate supply of minerals by:

- Maintaining a 7-year landbank of permitted sand and gravel reserves;
- Supporting regional consideration and planning of minerals through its membership of the South East England Aggregates Working Party.

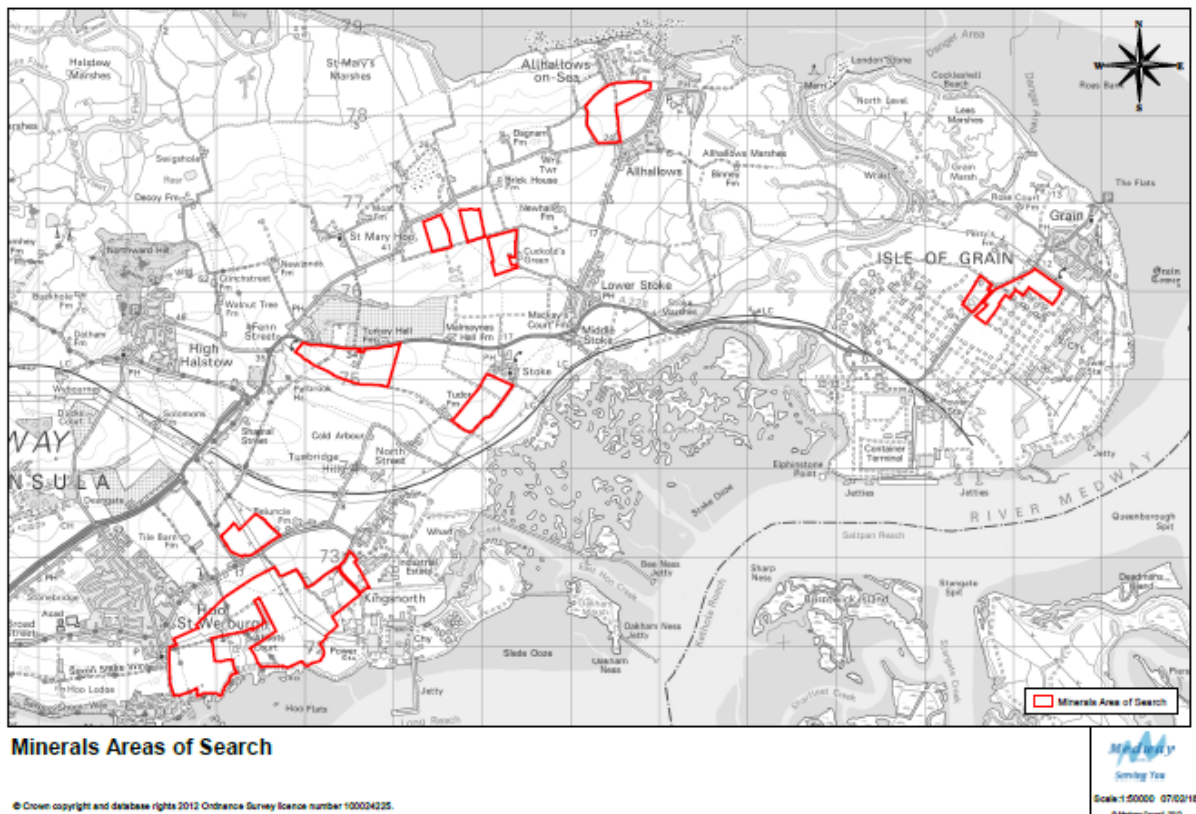
Land-won Minerals Extraction: Sand and Gravel

- 12.2 Planning permission has previously been granted for the extraction of sand and gravel at two quarries on the Hoo Peninsula, equating to a total permitted reserve of 1.3 million tonnes. Extraction of a large proportion of these permitted reserves is expected to take place over the next 10 years. Previous studies of river terrace sands and gravels on the Hoo Peninsula have identified in excess of 1.6 million tonnes of proven reserves, with between 0.9 million tonnes and 3.6 million tonnes of unproven reserves. Further studies of buried channel sand and gravel have also been previously undertaken within 2 specific areas on the Hoo Peninsula, providing reasonably robust evidence indicating reserves of 35.6 million tonnes.
- 12.3 The economics of exploiting the buried channel sand and gravel is not known and the likely impact of the extraction methods could be substantial, therefore only the identified reserves of river terrace sand and gravel will be safeguarded at this time. Furthermore, a 250m minerals consultation area will apply to all of these areas of search in order to safeguard against any development that would prejudice or prevent their future extraction.

Policy MWE2: Land-won extraction of sands and gravels

Proposals for the extraction of sand and gravel will be permitted within the identified areas of search when:

- There is a proven need for the minerals to be extracted at that time in order for the council to maintain a 7-year landbank;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
 - Exceptions will be considered when there are demonstrable overriding benefits that justify the development.



Land-won Minerals: Chalk and Clay

- 12.4 Whilst no recent interest has been shown for the extraction of chalk and clay in Medway, it would be prudent that the resources of chalk and high quality engineering clay 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.
- 12.5 Planning permission has been granted for a chalk quarry with permitted reserves for at least 25 years supply at Holborough in the neighbouring Tonbridge and Malling Borough Council, on the border with Medway.

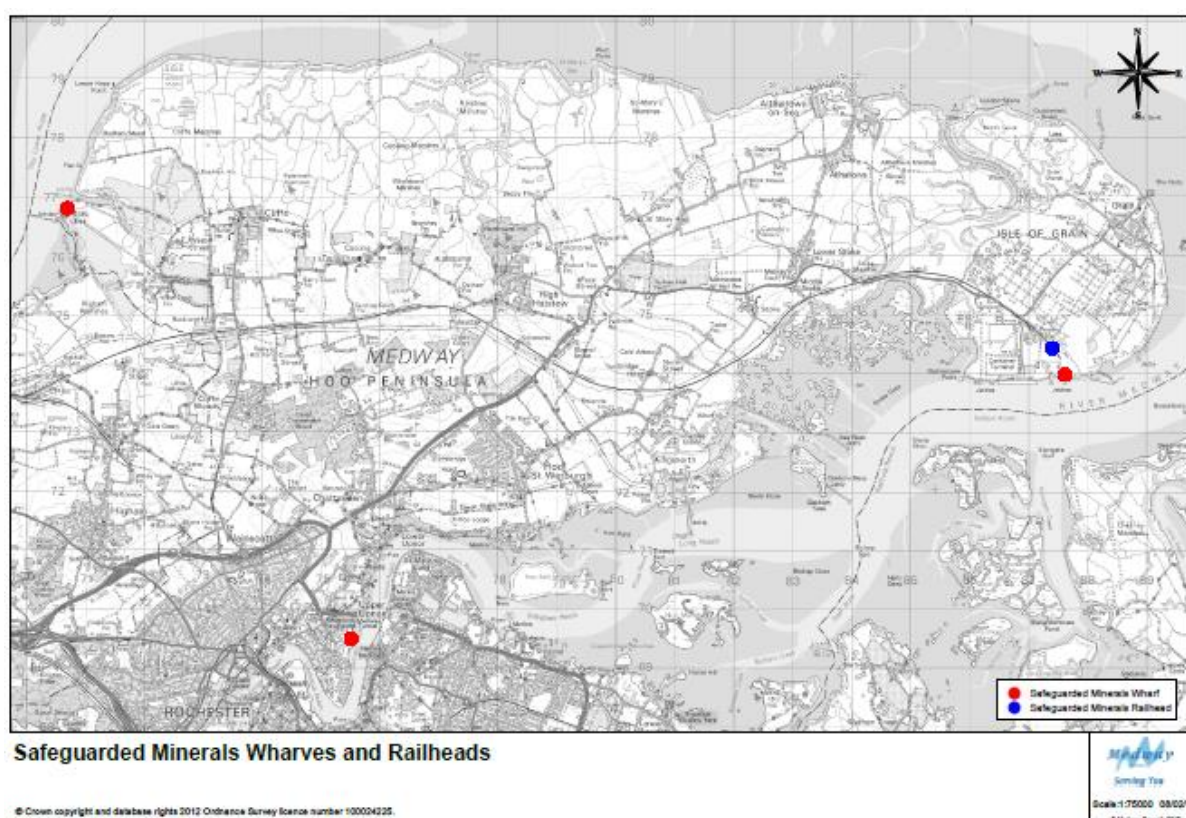
Policy MWE3: Land-won minerals: chalk and clay

Proposals for the extraction of land-won minerals will be permitted outside of the identified areas of search when:

- There is no adverse impact on sites designated for environmental or heritage significance;
- There is a proven need for the minerals to be extracted at that time;
- The site is not allocated for another use in the Local Plan;
- The site is located in an area that can accommodate the proposed development;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
- Exceptions will be considered when there are demonstrable overriding benefits that justify the development.

Minerals Wharves and Railheads

- 12.6 Medway makes a critical contribution to the south east's infrastructure for the importation of aggregates through its wharves; particularly marine dredged soft sand, sharp sand and gravel. The scale of the importation makes Medway's wharves of regional and national significance. Medway currently has 3 wharves that are used for the importation of aggregates, at Cliffe, Medway City Estate, and on the Isle of Grain.
- 12.7 Two of the wharves, at Cliffe and the Isle of Grain, have associated rail depots. It is noted that the rail depot serving Cliffe is located just outside of the Medway area in Gravesham borough. Both provide valuable infrastructure for the distribution of aggregates to the wider south east region.
- 12.8 In order to maintain Medway's contribution to the importation and distribution of aggregates, current aggregates importation and distribution facilities and their proximity will be safeguarded against development that would prejudice or prevent their use. Furthermore, a 250m minerals consultation area will apply to all of the identified wharves and railheads in order to safeguard against any development that would prejudice or prevent their future operation.



Policy MWE4: Minerals wharves and railheads

The identified minerals importation and distribution facilities that currently benefit from permanent planning permission will be safeguarded from development that would prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;
- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the importation or distribution facility can be made elsewhere in Medway.

Secondary and Recycled Aggregates

- 12.9 Materials defined as recycled or secondary aggregates are derived from demolition and construction waste, and industrial by-products such as power station ash, colliery spoil, blast furnace slag and slate. Materials can be used as substitutes for aggregates, such as in concrete production, and as fill material. The use of recycled and secondary aggregates is critical to the sustainable management of primary mineral resources.
- 12.10 Medway currently has a range of facilities that have the potential to supply recycled and secondary aggregates. In-line with government policy to secure the valuable finite resources of materials required for development, the council supports the use of alternatives to primary aggregates.
- 12.11 In order to promote the continued use of secondary and recycled aggregates as a sustainable alternative to primary aggregates, current facilities will be safeguarded against development that would prejudice or prevent their operation.
- 12.12 Many of these types of sites are often located within existing commercial and industrial estates; therefore a generic (non-site specific) means of safeguarding these facilities is required.

Other Minerals Infrastructure

- 12.13 National policy requires other types of mineral infrastructure to be safeguarded. This includes existing, planned and potential sites for concrete batching, the manufacture of coated materials and other concrete products.
- 12.14 As with secondary and recycled aggregates facilities, many of these types of sites are often located within existing commercial and industrial estates; therefore similarly an appropriate generic (non-site specific) means of safeguarding these facilities is required.

Policy MWE5: Minerals infrastructure

Facilities for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material in Medway will be safeguarded from development that will prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;
- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the facility can be made elsewhere in Medway.

Question MWE1:

Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway?

What do you consider would represent a sound alternative strategy for minerals planning in the Medway Local Plan?

Waste Management

12.15 As a Waste Planning Authority, Medway Council has the responsibility to produce planning policies for waste management to ensure that there is sufficient capacity to sustainably manage the waste streams in the area. The council also has the responsibility as a unitary authority for the contractual arrangements for the collection, treatment and disposal of municipal waste.

12.16 Medway is an active partner to the South East Waste Planning Advisory Group (SEWPAG); a technical advisory group that considers waste management issues. SEWPAG comprises local authorities from the south-east of England along with several stakeholders, such as the Environmental Services Association and the Environment Agency.

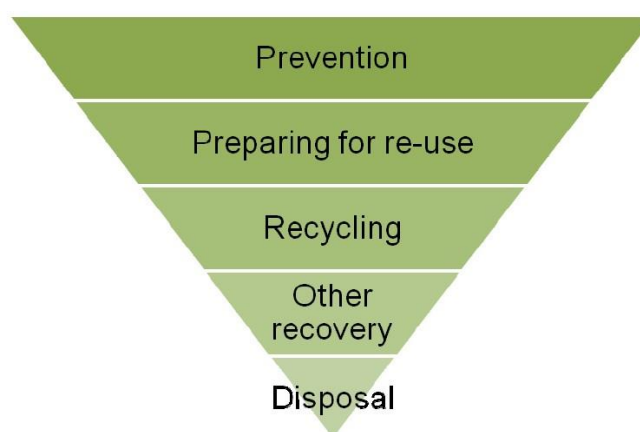
12.17 The Waste Management Plan for England (2013)¹⁹¹ and the National Planning Policy for Waste (2014)¹⁹² currently set the planning policy context for waste management.

¹⁹¹ Department for Environment Food & Rural Affairs, 'Waste Management Plan for England', December 2013, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

¹⁹² Department for Communities and Local Government, 'National Planning Policy for Waste', October 2014, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

Whilst the NPPF does not contain policies specific to waste, its principles remain relevant.

- 12.18 A 2016 Government report *From Waste to Resource Productivity*¹⁹³ provides an indication of current thinking on waste management, including recommendations on how the country must minimise waste and manage it more effectively through maximising opportunities to generate value from material that is both prevented from entering and extracted from waste streams.
- 12.19 One of the key principles of sustainable waste management is by driving waste management up the Waste Hierarchy; where '*Prevention*', '*Preparing for re-use*', '*Recycling*' and '*Other recovery*' come before '*Disposal*' as a last resort.



- 12.20 Another key principle is that the treatment of waste as close to its origin as possible; limiting the environmental impact of transportation elsewhere, and instilling a more responsible self-sufficient approach towards waste management.

Policy MWE6: Waste Management

All development should seek to minimise the generation of waste, having regard to the Waste Hierarchy.

The council will promote sustainable waste management within all new developments, ensuring that there is an appropriate provision for the separation, storage and collection of waste.

In order to help reduce waste through the development process, planning applications for major or strategic development¹⁹⁴ or those where significant levels of waste will be generated must include a waste management audit. The audit will be expected to show how waste is to be managed both through the construction period, including demolition and

¹⁹³ Government Office for Science, 'From Waste to resource productivity', Available at, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/667476/from-waste-to-resource-productivity-final-report.pdf

¹⁹⁴ Major development and Strategic comprises development of over 10 residential units, over 1,000sqm floorspace, over 2 hectares site area, or any development proposals requiring an Environmental Assessment.

remediation, if appropriate; and that effective means of managing waste arising from the development are provided.

The council will continue to actively support regional consideration and the planning of waste management through its membership of the South East Waste Planning Advisory Group (SEWPAG), and with neighbouring Waste Planning Authorities on cross-border waste management issues and opportunities.

New Waste Management Facilities

12.21 Many of the existing waste management facilities in Medway are clustered within existing industrial areas such as at Medway City Estate and Kingsnorth, near Hoo St Werburgh; therefore further waste development in these locations (as defined by Policy MWE7) would be appropriate provided that the relevant environmental standards are met.

12.22 Opportunities should be explored for the development of new waste management facilities in these locations that utilise the river Medway as a means of transportation.

Policy MWE7: New Waste Management Facilities

The council will strive to maintain net self-sufficiency across each of the waste streams through 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 industrial estates are the preferred locations for such activities. The development of waste facilities outside of identified industrial areas will only be permitted where:

- There is no adverse impact on sites designated for environmental or heritage significance;
- The site is not allocated for other uses in the Local Plan;
- The site is located in an area that can accommodate the proposed development and does not have an unacceptable impact on amenity, the local environment and transport networks; and
- The site comprises brownfield land;
 - Proposals on green field land will only be permitted where no alternative suitable brownfield sites can be identified.

Special consideration will be given to the development of waste management within existing established industrial estates that utilise existing rail facilities or the river Medway as a means of transportation.

Existing Waste Management Facilities

12.23 Medway currently has a range of waste management facilities capable of handling a number of different waste streams. This mix of facilities is of regional significance, particularly with regard to hazardous waste; therefore in order to fulfil the ambition to retain self-sufficiency and to achieve zero waste to landfill, the current facilities and their proximity will be safeguarded against non-waste development that would prejudice or prevent their use.

Policy MWE8: Existing Waste Management Facilities

Existing waste management facilities that currently benefit from permanent planning permission will be safeguarded from development for non-waste management uses, unless;

- The proposed site is allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;
- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the waste management facility can be made elsewhere in Medway.

Disposal to Land

12.24 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.

12.25 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.

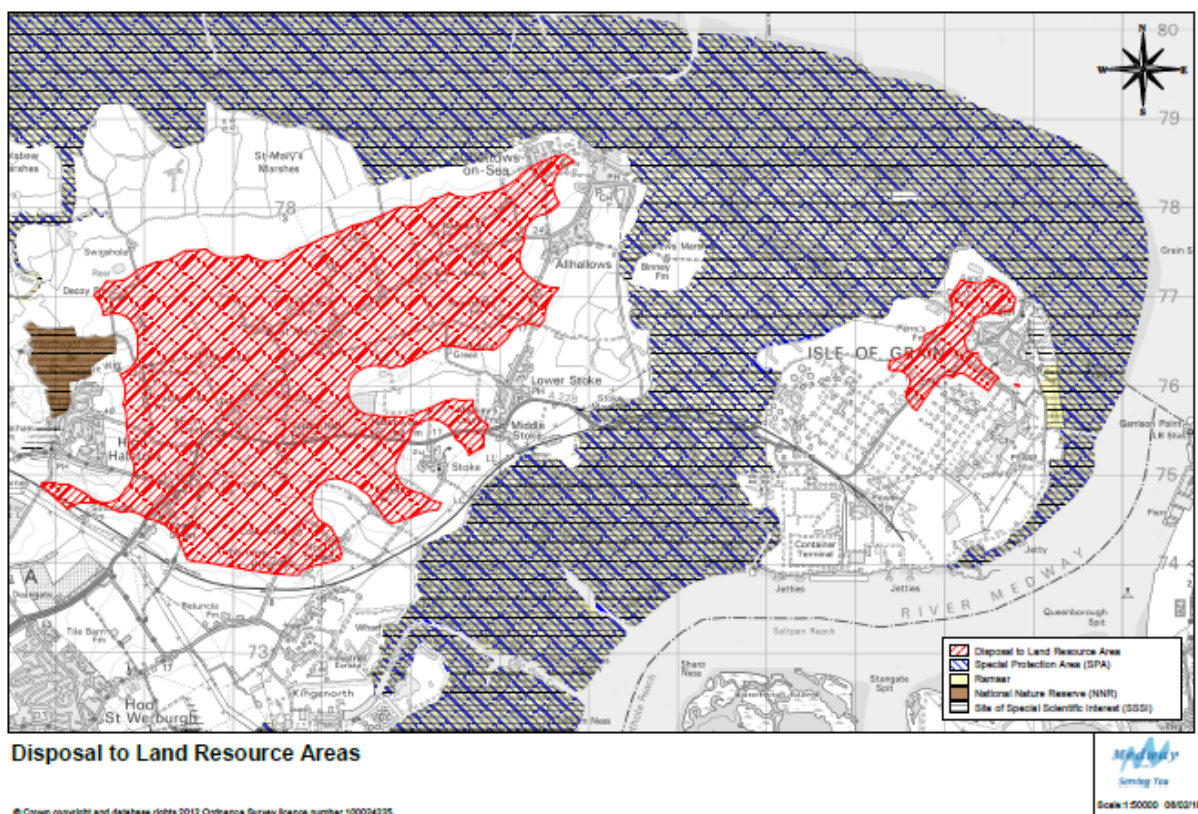
12.26 Due to the limited local market for the creation of new void space and the remoteness of the Hoo Peninsula to the wider market, no specific allocations for new landfill or land-raising facilities are proposed; however appropriate criteria for determining any proposals that may come forward in this area are provided.

Policy MWE9: Waste disposal to land

Proposals for the creation of void space or land-raising to facilitate a disposal facility for non-inert or hazardous waste located within the areas referred to as the Disposal to Land Resource Areas on the Hoo Peninsula and Isle of Grain will be assessed against the following criteria:

- Impact of development on rural landscape character and local distinctiveness;
- 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, and that impacts on the transport network are acceptable. Opportunities for transport by rail and water are encouraged;
- It being clearly demonstrated that the material 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; and
- There being a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site.



Waste Water Treatment Works

- 12.27 Waste water generally comprises surface water runoff, water discharged into the sewers and waste water that is resultant from other industrial and commercial processes that is then collected in sewers and transferred to waste water treatment plants. Here it is processed and treated, resulting in a reusable sewage sludge and effluent.
- 12.28 A range of works for the treatment of water can be undertaken without planning permission, however proposals for new and extensions to existing waste water treatment and disposal works generally require planning permission. Due to the necessity to construct facilities that are able to connect to the existing waste water

network, exceptions to the locational requirements set out in the waste management planning policies may be appropriate.

- 12.29 Whilst there is current capacity within Medway for the treatment of waste water, this may diminish during the plan period in-line with growth in the area. It is therefore anticipated that new, or extensions to the existing waste water facilities may be required to meet the need.

Policy MWE10: Waste Water Treatment Works

Proposals for the development of new, or the extension to existing waste water treatment works, sewage treatment and disposal facilities will be permitted in sustainable locations where there is a proven need for the proposed facility, and development does not conflict with the need to safeguard the environment and does not create unacceptable impacts on amenity.

Question MWE2:

Do the proposed policies MWE6-MWE10 represent the most sustainable approach to managing Medway's waste?

What do you consider would represent a sound alternative strategy for waste management in the Medway Local Plan?

Energy & Renewables

- 12.30 Medway is of national significance for power generation, electricity and aviation fuel distribution and Liquefied Natural Gas (LNG) importation.
- 12.31 Power stations located at Damhead Creek and the Isle of Grain have a combined installed capacity of 3GW.¹⁹⁵ This represents almost half of the installed capacity for the South East region and 5 per cent of the UK.¹⁹⁶ Damhead Creek has planning permission for a significant expansion in generating capacity.
- 12.32 The Grain LNG terminal is the largest in Europe and eighth largest in the world, with plans for further expansion.¹⁹⁷ The terminal has a vast regasification capacity and a ship reloading facility to help meet high export demand to Europe and lucrative international markets, having received seven cargoes in 2017, including the first shipments from the US and Russia.^{198,199} Global LNG supplies are expected to

¹⁹⁵ Department for Business, Energy & Industrial Strategy: Power Stations in the United Kingdom (operational at the end of May 2017), <https://www.gov.uk/government/organisations/department-for-business-energy-and-industrial-strategy>

¹⁹⁶ – *Figures derived by analysing data for conventional forms of energy for the South East and England (i.e. coal, oil, natural gas and nuclear power generation)*

¹⁹⁷ GrainLNG, <http://grainlng.com/>

¹⁹⁸ Financial Times, 'UK gets first big shipment of US liquefied natural gas', 2017, (online), Available at: <https://www.ft.com/content/f7ea9416-616e-11e7-8814-0ac7eb84e5f1>.

increase substantially, making this a competitive fuel source for various purposes. LNG is considered a vital part of the energy mix, given the reduction of domestic gas production.²⁰⁰

- 12.33 Various pipelines and cables forming part of the national energy supply network also cross the Medway area, including the two-way electrical inter-connector (BritNed) linking Grain and the Netherlands. Aviation fuel is also imported, stored and distributed from Grain.
- 12.34 The proximity of power stations to the proposed expansion of Hoo suggests there is potential for large scale district heating utilising waste heat from power plants. Previous initial feasibility studies in relation to Kingsnorth indicated a scale of opportunity unique in the UK. This would seemingly help to ensure that Hoo is a sustainable location for growth. New policy may also seek to establish a mechanism to target existing buildings as well as new development, for example through a dedicated fund for off-site mitigation in lieu of on-site provision.
- 12.35 Medway's contribution to national energy supply and security will represent a strategic priority in the new Local Plan. The proposed policies will encourage future opportunities for new power generation and energy storage, especially where this secures investment in the Grain freight line.

Energy and Renewables

- 12.36 The vision clearly states that Medway's growth will promote a low carbon economy, seeking to address and mitigate climate change, while the provision of quality, effective infrastructure represents a strategic objective.
- 12.37 National planning policy requires Local Plans to "support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances."²⁰¹
- 12.38 In planning for renewable energy, Local Plans should take a positive approach by identifying suitable areas for renewable energy generation and its supporting infrastructure, and by maximising the opportunities for community-led and decentralised energy production.²⁰²

¹⁹⁹ Financial Times, 'First ever shipment of Russian gas unlikely to remain in UK for long', 2017, Available at: <https://www.theguardian.com/business/2017/dec/29/russian-liquified-natural-gas-shipment-unlikely-remain-uk>

²⁰⁰ Financial Times, <https://www.ft.com/content/6fc45d4e-dfed-11e7-8f9f-de1c2175f5ce>

²⁰¹ Department for Communities and Local Government, 'National Planning Policy Framework', Section 1, Paragraph 21, pg.6, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

²⁰² Department for Communities and Local Government, 'National Planning Policy Framework', Section 10, Paragraph 97, pg 22, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- 12.39 A Ministerial Statement, dated 28 June 2015, states that proposals for wind energy development should only be granted planning permission if the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and, following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed.
- 12.40 Medway commissioned a Renewable Energy Capacity Study in 2010.²⁰³ Although this document is somewhat dated and predates current national planning policy, it nonetheless provides a comprehensive assessment of a baseline and opportunities for renewable energy. This can be supplemented with the government's mapping tool to help identify locations with opportunities for heat supply.²⁰⁴
- 12.41 The renewable energy market was considered to be suppressed at the time of reporting; however, the document stated that policy should be sufficiently flexible to address changing market conditions. Any policy demands should be accompanied by the onus of evidence of non-viability being provided by developers.
- 12.42 An Energy Opportunities Map identifies areas favourable for specific technologies in Medway. However, these indicative areas would appear to compromise potential site allocations for wider development.
- 12.43 The study identified potential district heating opportunities through power stations. Specifically, the study highlighted an exceptional opportunity to re-use waste heat through a district heating grid. Central Chatham benefits from the proximity of the hospital and several schools; there are potential synergies for a heat network. The Hoo Peninsula provides a distinct opportunity for large scale wind energy installations, subject to restrictions from built-up areas, environmental land designations, and other materials considerations. Small scale wind energy was considered to be viable on most of the Hoo Peninsula and in other areas to the south. Areas suitable for solar technologies were also identified.

Policy MWE11: Energy and Renewables

Proposals for energy developments, including any ancillary building or infrastructure, will be supported unless:

- the impact would compromise statutory designations where national planning policy restricts development;
- their scale, form, design, material and cumulative impacts is unacceptable to the local landscape or built environment, or loss of the best and most versatile agricultural land;
- any adverse impacts on the local community, economy, biodiversity or historic interests cannot be mitigated;

²⁰³ Medway Council, 'Renewable Energy Capacity Study in 2010', available at:

<http://www.medway.gov.uk/pdf/Renewable%20Energy%20Capacity%20Study%202010.pdf>

²⁰⁴ Department for Business, Energy & Industrial Strategy, 'UK CHP Development map', Available at:

<http://chptools.decc.gov.uk/developmentmap/>

The council will consider the designation of defined areas for renewable energy technologies through a Local Landscape Character Assessment.

The council will actively promote the development of local supply chains and other associated employment opportunities.

The council will explore opportunities for Combined Heat and Power Systems connected to district heating networks.

Low Carbon Development

- 12.44 The transition to a low carbon economy and the implementation of quality design standards are important elements of the vision and strategic objectives.
- 12.45 National policy is clear that planning has a key role in helping address climate change; this is central to the economic, social and environmental dimensions of sustainable development.²⁰⁵ This also provides for improvements in the energy efficiency of existing buildings.²⁰⁶
- 12.46 The 2010 Renewable Energy Capacity Study²⁰⁷ found that the largest source of emissions arise from domestic properties, reflecting the mix of building stock in Medway. The domestic and commercial emissions projections identified a limited level of impact on overall building stock emissions as a result of new-builds only. The study suggested that the transition to a low carbon future will therefore require policy measures that target existing buildings as well as new development.
- 12.47 The vast majority of applications in Medway are for small developments, i.e. for less than 10 dwellings or 1,000 sq m of non-residential floorspace. The cumulative impact in terms of increased energy demand and carbon emissions of these proposals will be significant. As a result, the study suggested the council consider the introduction of a policy to address the impact of extensions to existing dwellings to support Building Regulations.
- 12.48 The study also suggested that the council consider the establishment of a carbon fund for developers to make an off-site contribution where on-site carbon reduction measures are deemed unviable. For example, the fund could allow for targeting insulation improvements for poor performing stock or pooled towards investments in new infrastructure, such as a community heat network. This would require a clear

²⁰⁵ Department for Communities and Local Government, 'National Planning Policy Framework', Section 10, Paragraph 93, pg 21, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

²⁰⁶ Department for Communities and Local Government, 'National Planning Policy Framework', Section 10, Paragraph 95, pg 22, 2015 Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

²⁰⁷ http://www.medway.gov.uk/pdf/renewable_energy_capacity_study_may_2010.pdf

programme for implementation of off-site energy measures and an appropriate means of delivery.

Policy MWE12: Low Carbon Development

This policy seeks to implement an energy hierarchy by achieving energy efficiency first, before requiring the implementation of other forms of renewable energy generation on a larger scale.

Developers are required to follow the hierarchical approach set out below in achieving the energy and carbon dioxide emission requirements of the Building Regulations for all new residential development. New non-residential development is encouraged to follow the same approach.

1. To improve energy efficiency through thermal and fabric performance improvement measures.
2. Provide on-site renewable energy generation or on-site connected heating, or Combined Heat and Power (CHP) technologies, or Combined Cooling, Heat and Power (CCHP) systems.
3. The remainder of the carbon reduction targets to meet the Building Regulations targets should be met through suitable additional measures.

Developers are encouraged to meet higher standards than those required nationally, and pursue additional low carbon or renewable energy generation measures where practicable.

Compliance with this policy approach is required to be demonstrated through design and access statements submitted with a planning application.

Question MWE3:

Do the proposed policies MWE11- MWE12 represent the most sustainable approach to planning for energy in Medway?

What do you consider would represent a sound alternative strategy for energy in the Medway Local Plan?