

Medway Council.

6th March 2017

09 MAR 2017

RE; Structure Plan.

The document mentions establishing a vision to drive economic success at the same time as addressing inequalities. Whilst not denying that careful planning may have to be sought to achieve that vision however accommodating sustainability of the Hoo Peninsula for example must avoid harm to its natural environment of which folk are attracted. It has to be acknowledged that protecting the best of Medway's heritage and its natural environment is of paramount importance to the people it attracts. The Peninsula is not such that major change can take place without some consequence for its historic character and the way that character benefits the folk it accommodates.

Strategic Issues

The expansion of the Medway Towns to meet the Employment and Housing targets set out in the Government Objectives cannot be reached, or not even started, no matter which of the set out four scenario's is finally adopted, unless there are major and immediate consideration, planning and implementation of improvements to the transportation links and health services across the whole area.

The roads are gridlocked, the train services are overloaded and erratic, GP's surgeries are overflowing and the major hospital in the area is struggling to meet the needs of an expanding population, which exceeds by hundreds of thousands the number it was designed for. Each improvement made is just papering over the cracks for the short term gain.

Scenario 3: A Rural Focus.

The scenario, if approved would permanently destroy an area of valuable countryside. The scenario identifies Hoo St Werburgh as a focus for growth, expanding the village into a rural town. Principle expansion would be set outside the existing village envelope of Hoo village, but is within the parish of Hoo St Werburgh, and would join together the settlements of Hoo, Chattenden, Deangate and Lodge Hill, and reducing the green belt buffer zone between the peninsula and the spiralling developments of Strood and Wainscott , damaging the character of each of these local communities and riding roughshod over the wishes of significant numbers of taxpayers/local residents who wish to protect the countryside and the semi-rural environment.

The application, if approved, would signify a serious and continued over-development of the village of Hoo, and the wider Hoo St Werburgh Parish. Following mass over-development on land located East of Bells Lane, where no additional infrastructure was or has been provided, which has seriously impacted on the villagers as a whole, these further developments would be a development too far.

With regard to accommodating a level of future growth making Hoo into more of a 'Market Town' rather than a village may be a step too far. Again it is mentioned that a larger scale of planned growth would come with improvements to existing facilities and provision of new – that did not really happen during the old plan and our members are sceptical with the suggestion that it will happen within the new plan. There is also much concern where it is mentioned 'there is scope for freestanding settlements on the Hoo Peninsula'.

This application, if approved, would add a greater burden of road traffic on the already busy Four Elms Hill, Main Road and other approach roads. The roads in this area have long been unable to cope with traffic levels at certain times. In particular there have been numerous near misses in Main road in the vicinity of the Secondary school and this will be exacerbated by the on-going development of the new Primary School on the site, which is already needed to cope with the increased population.

If successful the application would result in thousands of additional car journeys each day, including the current and projected commercial vehicle movements from industrial areas at the Isle of Grain, Kingsnorth, and the numerous farming

and storage outlets across the Hoo peninsula. Four Elms hill is the only main access route for residents in the villages of Chattenden, Hoo, High Halstow, Stoke, St Mary Hoo, Allhallows and the Isle of Grain.

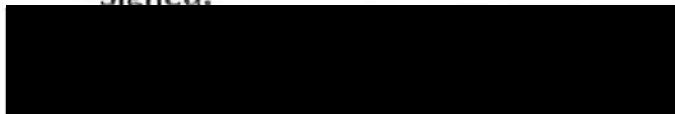
The only access and egress to the Hoo Peninsula the **A228 at Four Elms Hill** which has not seen any improvement since it was duelled, even though many hundreds of dwellings have been allowed to develop over the last few years on the Peninsula and especially in Hoo. Even the 'Sharnal Street Bypass' was privately funded by business. **Four Elms Hill is the gateway to the Peninsula** and when it is closed (which is quite often) the Peninsula is closed to the outside world. With regard to accommodating a level of future growth making Hoo into more of a 'Market Town' rather than a village may be a step too far. There is also much concern where it is mentioned 'there is scope for freestanding settlements on the Hoo Peninsula'. Further along its length, the A228 Peninsula Way reverts to a single carriageway road, which is a source of a considerable number of serious road traffic accidents, and the plans to create employment opportunities at Grain and at the Kingsnorth Power Station sites will increase the amount of road traffic, especially HGV movements on this road.

The proposed development scenario will destroy valuable agricultural land, with the uncertain future facing the proposed farming community and the country's population following the Brexit vote, and the demise of the Common Agriculture Policy, if it becomes necessary for the country to produce more food, this land becomes increasingly important, as once built upon it cannot be recovered.

Over-development of the Hoo Village in recent years has resulted in capacity problems at the local primary school, GP provision, (one of the two GP surgeries in the village has recently closed registration to new patients), dentistry services, general community facilities and local roads. The utility services are stretched to breaking point and beyond, on occasions with sewage removal being a particular problem at times, resulting in difficult problems for some residents which the Water Company have failed to solve. The existing Ancient Watercourse, (known as the Brook), which runs through the village is running at higher levels due to increasing rainwater run-off, as a result of development with inadequate drainage provision, this has resulted in occasional flooding at periods of continuous/heavy rainfall. The increased flow is resulting in serious erosion of the river banks, which the Parish Council is having to resolve with expensive repairs.

Finally, I would urge that the desire of the villagers to remain separate from the main conurbations of the Medway Towns should be respected and the creeping urbanisation halted.

Signed,

A large black rectangular box redacting the signature of Michael Williams.

Michael Williams

bull, andrew

From: [REDACTED]
Sent: 17 May 2017 08:55
To: futuremedway
Subject: The Local Plan

Dear Council

We are adding the following to our suggestions for the Local Plan in response to today's BBC news@

Hedges are often better than trees at soaking up air pollution among tall buildings, research has suggested. They can trap toxins at exhaust pipe level, so reduce people's direct exposure to harmful pollutants.

Lead author Prof Prashant Kumar of Surrey University, who works for the EU, said councils should try to plant low hedges between pedestrians and the street if pavements are wide enough.

"The emissions from vehicles starts to dilute very quickly as you move away from the road - so any hedge that acts as a barrier slowing down the airflow and catching pollutants on the leaves is going to offer people in homes better protection."

The paper comes as cash-strapped councils round the UK are starting to charge households for collecting green waste.

If this policy prompts people to remove their hedges to avoid the charges, it seems that the neighbourhood may suffer."

Could the Council now bear this evidence in mind, as they debate the Local Plan, and when they consider allowing planning permission for concreting front drives.

Thank you

Michele Guinness

[REDACTED]

From: [REDACTED]
Sent: 27 May 2017 21:24
To: futuremedway
Subject: Contribution to The Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Council

Given that there is no choice but to build so many new homes, we would like to make the following suggestions for the Local Plan, in the hope that they might contribute to the quality of life of all local people:

1. Green investment wherever possible to enhance mental health and wellbeing – creating parks and gardens in every new building development area, and pavements wide enough for the planting of trees that absorb CO2 emissions, and enhance the area. London has far more parks per capita than the Medway, so it is essential that more pleasant recreational areas are created.
2. Preserve “Green Corridors” – ie small spaces wherever possible, by ending the nonsense of giving Council planning permission for both concreting front gardens for car parking, and for large rear extensions disproportionate to the space available – even in the conservation areas!!
Even if drainage grids limit the risk of flooding, concreting or block paving a front garden still means the removal of trees and plants that absorb the CO2 emissions. Not to mention robbing the neighbours of the attractiveness of the road.
Large extensions swallow up back gardens, causing ecological damage to the neighbourhood - the loss of bugs, butterflies and birds, as well as play facilities for children. One of the Council’s environmental report says almost half the birdlife in the Medway has vanished already. There is almost no birdsong now in densely populated areas.
3. Enhancing what we already have in the Medway. Some countries have an annual “tree festival”, where every school plants a tree. Medway could be one of the first Councils to instigate a “tree festival”, encouraging the supermarkets to fund the planting of trees in the area, and around their car parks (which may be in the way, but no more so than bollards, and they’re more attractive), as the French do, and schools to plant trees around their playgrounds and in the streets outside.
4. The French also cover their roundabouts with plants and flowers –encouraging local people to take more pride in their towns. Modelling environmental care is essential for encouraging responsible care in local people.
5. The Local Plan pays little attention to Chatham and Gillingham High Streets, which, sadly, are usually the laughing stock of any visitors we have. They simply cannot be forgotten! Replacing Budgeons on Gillingham High Street is not vision enough. The Council needs to look at what “carrots”, such as low rents, might encourage more quality, or even “trendy” businesses into both High Streets. Out of town centres, such as Hempstead Valley, have destroyed the high streets, but parking at Hempstead is now very difficult, due to the new food outlets, which means it could be a time to invest in the high streets and make them the heart of the Medway again.

We do hope these positive suggestions can be fed into the Local Plan, as we feel they are essential in preserving the quality of life to which the plan aspires – that the Medway might not simply become an urban sprawl with no attractions that compare with the rest of Kent.

We would very much appreciate acknowledgement of our email, as our letter sent some months ago, received no acknowledgement whatsoever, despite the involvement of our local councillor.

Yours sincerely

Michele Guinness (Mrs)



Introduction

This is a (late) response to the Regulation 18 consultation report on the Medway Council Local Plan issued earlier this year. The author's excuse for such a late responses that I've only moved into the area at the beginning of this year and was unaware of the process until visiting the Rochester Riverside consultation recently

Smart cities

With the very rapid increase in connectivity for all sorts of applications, this is a key time to recognise that all cities will benefit in many ways, well summarised in a recent EIU report about Asian cities. Given the objectives expressed in the recent consultation report, the smart city approach must be an essential tool in integration of many requirements for a growing modern economy in the area. If nothing else, the 'Smart City' is a very useful marketing concept, giving residents a unifying concept to the series of developments proposed by the Council.

Several references are made in the consultation report to different aspects of connectivity and its benefits, but the document would be much stronger for the Smart City to be used as a unifying theme, if only to spark the imagination of residents about benefits to each of them. Many of the benefits proposed by the consultation report are technology-led, and one should indeed think of Smart City and technology-led development interchangeably.

This approach will also help Medway learn from the plans and experiences of other cities, both in the UK and elsewhere.

Energy Plan

Given the essential need of all urban areas for a reliable source of energy, at the same time minimising the carbon footprint, an essential part of any future development must be a proper energy plan, completely integrated into the main plan. This is conspicuously absent in the consultation report and must be rectified to demonstrate how Medway will meet the 80% reduction in carbon emissions by 2050 target, not merely stated as a platitude.

It was apparent from the comments at the recent Rochester Riverside consultation evening that there was some sort of airy expectation that this key target would be met simply by following the evolution of Building Regulations and the purchase of carbon offsets. This approach will not have a remote chance of success, if only because of the huge legacy of older structures in the area. It would be also against the ethos of the conservation objectives expressed in the consultation report. A more progressive approach can be seen, for instance, in the Warmer Bath document published a few years ago. Many cities on the continent have also made very significant progress in this area, especially in Germany. These lessons should be incorporated, both within the main Planning Document and the proposed Energy Plan, hopefully forming part of the main Planning Document.

Key Energy Developments

The current rate of development, both in the technologies and the commercial, financial and legislative landscape of the energy industries and marketplace, are currently very striking and vivid, truly a disruptive scenario. If nothing else, the rapid change in fortunes of the energy companies from a decade ago is a very good indicator of the wider pattern of development. Typically the profitability of the large electricity supply companies operating in the UK and Europe has halved in that time, consonant with the rise of many other players in the energy markets. It would seem prudent therefore to recognise these changes and incorporate strategies to deal with them so that there is significant benefit over the next 20 years for residents and consumers.

Renewable energy

Solar PV

One of the more remarkable events this year has been the very rapid increase in installation and deployment of solar panels around the nation which, combined with electricity from wind farms, has several times already been sufficient to take all the coal-fired stations off-line for several hours each day. This is a very significant development due, in great part, to the encouragement provided by government subsidies over a period of many years in the form of FITs – Feed in Tariffs. These were effectively withdrawn last year but still there has been an increase in the solar generation fleet, helped very much by the rapidly declining installation price of solar panels, now below £2000/kWp, despite adverse currency conversion rates recently.

One of the more remarkable things about coming to live in Medway is the comparatively low density of solar PV installations in large areas of the conurbation, the reasons for which do not need spelling out. It therefore makes good sense to try and develop initiatives and financing mechanisms to encourage the installation of solar PV, especially on new installations such as Rochester Riverside.

This is certainly more difficult in conservation areas, and it then makes sense to work with local solar farm installations to procure their output on a preferential basis, keeping the proceeds within the local community.

Solar Thermal

Solar thermal is the installation of liquid filled panels on roofs for water heating. These have the significant advantage of being able to store energy economically in hot water tanks even down to the scale of the individual house. At the same time they can abstract up to 60% of the solar energy available (solar PV at best absorbs 20% max). With the design and specification of modern domestic housing, this ensures that solar thermal can provide a significant proportion of both the hot water demand and space heating in spring and autumn when modest boosts only are required. They are best again incorporated in new buildings, rather than adaptation of older buildings, unless the building already has a storage hot water tank installed.

Heat Pumps

Two types of heat pump are usually deployed in the UK, air source and ground source. However, with the very large tidal water resource available within the Medway, renewed twice a day, a serious contender for space heating in both buildings and domestic housing should be water-based heat pumps, perhaps combined with some form of district heating network. Space heating requires comparatively low level heat sources such as tidal water and a strong economic case can be made out for their deployment, displacing comparatively high calorific value sources such as natural gas. Good evaluation models have now been developed and these should be employed to determine if there is an economic and financial case for heat pump installations in medium to large-scale developments such as Rochester Riverside. This would certainly help the attainment of the 80% carbon emission target.

One of the unfortunate effects of the introduction of new technology is the concomitant spread of new acronyms, for which the author apologises! Wherever possible these have been explained.

CHP – Combined Heat and Power

In the right circumstances a similar case can also be made out for CHP units where significant constant electric loads are available, together with long period heating system requirements. A good evaluation paper on this is available. Again CHP would be a serious contender for an overall development such as Rochester Riverside.

Smart Grids

The existing electricity grid structure has been historically developed on the classic top-down model, at the centre of which are large baseload power stations. We still benefit from very large investment by the CEBG during the period between 1950 and 1980. However, with the increase in population of area such as Medway, the grid system will need reinforcement. If, at the same time, there is significant installation of distributed energy resources such as solar PV and CHP, there is need for new investment in both the conductors and the control systems. Industry has already made a large investment in the development of new systems and switchgear to reflect this requirement and these together form an integral part of the concept of a smart grid. In turn, the smart grid is an essential component of any Smart City.

It is therefore both prudent and important to ensure that the requirement is incorporated into the Local Plan, in the same way as other infrastructure.

DER – Distributed Energy Resources And Storage

A significant limitation of resources such as solar PV and wind is that of intermittency, requiring therefore that the grid system have sufficient reserve resources to pick up the load in the event of failure of solar PV and wind generation. More and more this is being addressed with energy storage at various points in the grid, requiring intelligent control. Again these developments are being much helped by a combination of a reduction in price of energy storage in batteries, together with rapid development of control and safety devices.

At the same time DER is much helped by the spread of intelligent devices and appliances which can be controlled remotely. Good examples are refrigeration and air conditioning systems, washing machines, water heating, et cetera. These can, for the most part accept delays of up to 60 minutes without significant impairment of their basic function. DER methods and equipment installations are therefore a key component of an efficient smart grid.

Many of the large power station resources using coal and oil for fuel are reaching the ends of their useful life, their retirement ensuring a more difficult problem for stable control of the grid and thereby enhancing the need for DER at the local level.

BIM – Building Integrated Management

Simple BIM systems have been incorporated in houses and other buildings for many years in the form of programmable timers. These have been rapidly developed over the last few years, however, into much more sophisticated systems, the first of which we are seeing on offer to domestic consumers, e.g. the Hive system available from British Gas. Equivalent systems are available for larger buildings such as retail premises, offices, workshops and factories. These will integrate fully with DER systems where required.

I O T – Internet of Things

All of the developments described in the last few paragraphs depend on the integration of intelligent sensors within components, appliances, systems, and buildings, as well as transport. These are the advanced troops in the deployment of IOT – the Internet of Things. Their communication requirements will therefore demand bandwidth from connectivity systems such as broadband, as well as sophisticated security to minimise interference from external malefactors.

Energy Data and Forecast

An essential part of the Energy Plan is a good understanding of the overall energy sources currently being used by the Medway area. These are described in outline in the consultation report, but this would be massively enhanced by a proper analysis of those energy sources. In the author's experience, these are usually available down to the ward level from ONS statistical sources and can be readily assembled in an Excel spreadsheet.

Such a document will form an essential basis of the Energy Plan and would demonstrate – perhaps too starkly – the dimensions of the task to meet the 80% reduction target by 2050. It should also suggest avenues by which all the various parties involved in a project such as Rochester Riverside can solve the energy trilemma of low-cost, availability and sustainability.

Immediate Applications

Rochester Riverside Project

As already explained, the recent consultation evening at the Corn Exchange in Rochester clearly illustrated the need for a coherent approach in the Local Plan to the energy requirements of the various assets to be installed on the Rochester Riverside project. In particular, as a matter of urgency with the appointed developers, the energy budget should be developed and reviewed to ensure that it will meet the 80% carbon emission reduction, not simply the letter of the Building Regulations in force at the time. All of the tools are potentially already available to ensure this – they just need to be properly deployed.

Financing

Given the concentration of generation and control facilities proposed in this document, it is suggested that it should be possible to aggregate the capital cost requirements for one or more projects such that they become an attractive proposition for financing in the market, enhanced possibly if residents could also invest in the manner of community energy projects. This would be a mechanism to involve local residents and ensure benefits for the local economy.

Training

The author has recently taken up residence in one of the new developments in central Rochester, Kings Quarter – part of The Terrace off Victoria Street. This has been a decidedly mixed experience, one reason being the poor level of training and familiarity of many of the subcontractors involved, together with the parlous nature of the project financing. It highlights that the key trades such as plumbing, electrician, and carpenter, need proper training in some of the new technologies to make a success of such new developments.

In order to avoid a repetition of such problems on a larger scale in projects like Rochester Riverside there should be a strict contractual provision for any main contractors to ensure proper training of all employed subcontractors in the modern technologies to be deployed – before they are let loose on site to allegedly learn on-the-job! Further, in order to make a success of modern technology integration, different trades must learn to work much more closely with each other, especially in installation, testing and set up of all systems. The traditional demarcation lines between trades needs to break down to ensure greater productivity and better quality control. It is also a function of good site management where, historically, they will come with a background in one trade or another which limits their vision of the required objective – again this is a matter of good training.

References

Department, Medway Council Policy Planning. 2017. *Medway Council Local Plan 2012 – 2035 – Development options – Regulation 18 consultation report*. Chatham : Medway Council, 2017. p. 132.

Energy, Bath Preservation Trust and the Centre for Sustainable. 2011. *Warmer Bath – a guide to improving the energy efficiency of traditional homes in the city of Bath.* Bristol : Centre for Sustainable Energy, 2011.

KPMG, Lightsource &. 2015. *The Decentralised Energy Transition.* London : Lightsource and KPMG, 2015. p. 65. Very good summary of changes in UK electricity sector.

Unit, E I U – Economist Intelligence. 2017. *Start-Up My City – Smart and sustainable cities in Asia.* Singapore : E I U, 2017. Although about Asian cities, equally applicable in many respects to any city.

Author Contact: –

Mike Slavin

[REDACTED]

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[REDACTED]

[REDACTED]

From: Michael White [REDACTED]
Sent: 06 March 2017 16:54
To: futuremedway
Subject: Medway Local Plan 2012 - 2035

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Red Category

Good afternoon,

Scenario 4 (as the Executive Summary dated January 2017) is the logical option. The availability of 7 railway stations provides Medway with easy access to London & beyond. Thus urban development with good access to the stations should be maximised. In addition the movement of as much of the Medway Trading Estate as possible to Kingsnorth would release prime riverside land for development.

Urban development on the Peninsula must be considered but should be limited bearing in mind the limited basic services available. Water, waste, power, medical & associated services are already overloaded & of course vehicular access must be upgraded with a second major road to get round the pinch point of Four Elms Hill. Any development should include major contributions to upgrade these services.

In addition we must retain as much of the designated open spaces on the Peninsula (including all the woodland areas of Lodge Hill) to provide locals and newcomers with the necessary outdoor & leisure facilities.

Regards

Mike White
[REDACTED]

Miss BARBARA TOWES

07 MAR 2017

07 MAR 2017



Dear Sir / madam.

March 5th 2017.

I am writing about my great concern of the amount of housing planned for the development in Medway. I.e. the Local plan consultation, planning development. It is so over crowded here now & with more housing, our schools, medway hospital etc; will not cope. Medway hospital is already not being able to cope & yet they want to close it down later on & build another hospital some where else. Medway hospital is not coping - because we use to have other hospitals like All Saints, which was pulled down some years ago & flats built there so that put pressure on Medway hospital also. All saints was a valuable building having been a work house in the old days & it was used for my late mother to recover in & not living far from All saints. I could go & see her & help care for her. (as I was her

carer) every day. It should not have been
pulled down ~~but~~ built on.
& now I see St Barts hospital in
Rochester is closed. That lovely old
hospital. all built. so many years
ago - possibly the oldest hospital
around. I do hope & pray that is not
going to go the same way as All
Saint hospital has knocked down for
flats: are we not allowed to keep our old
buildings any more? have they all got to be
knocked down & used for flats?

It is a lovely old hospital & should be used
as such. Which would help Medway hospital
with its bed problem.

my late Aunt was sent there to recover
& again, I could get to see her but my
other Aunt I couldn't see as she was
sent too far away & I didn't get the
chance to see her before she died & we
were very close especially after my
mother's death.

And now I read in the newspaper
that Kitchener barracks is to be turned
into flats & homes. more old buildings
to face the cut.

I feel really upset over the barracks
as it was built in 1754 (the
same as I feel upset & heartbroken

3

over, St Barts hospital) do we not have
the national Heritage place/people
to help save our history? soon it
will be no old buildings - here at all
only flats were they use to be &
we will be so full of people we won't
be able to move we are already full here
now in Chatham especially with lots of
cars as its a nightmare for me to try
& cross the crossing that goes round to the
Brook. I have sight problems so I can't do
what some people do & walk inbetween
the cars as I can't judge them I have to
wait for the green man which takes ages
to come on then when he does sometimes
theres big lumps across the crossing
so I have to wait again & usually its
raining hard & I get wet through it
is so bad with cars etc there surely a
walk over bridge should be put there
for us to walk over thats how bad that
road is to cross I fear one day I will get
knocked down there I'm so afraid to cross
there I try & cross with ladies with
buggys if I can yet you want to build
more here were is it all going to go?
what schools & hospitals will
these people go to I know medway
hospital is always short of beds
& yet they want to close it.

& gave us here with no hospital at all? why? why? why?

Do we not deserve a hospital any more?
we once had 3, now we will be left
with none. & Medway Hospital also
has history, as it was a Navy hospital
during the war, as my uncle was treated
there, while fire watching, & he fell 20 ft.
so it should not be destroyed & taken
from us.
I do not understand this thing of destroy-
ing every old building. when our
children & Grand children grow up, there
be no old buildings for them to see, there
all be gone, our history wiped out by
flats & our roads & places, so over run
with people, it will be hard to get
from A to B, & this thought really
scared me,

So, you can see, I am really concerned about
 this local planning, housing, development
 & how it will, not only, affect me, but every
one else, who live, in Medway.

we are too full, here now, & are losing
so many of our, lovely, old buildings
because of, housing, development, in
the past.

Let, there, more, to be destroyed, for Flats,
 like that, lovely, old, kitchens, Barracks
 that was built, in 1757, it will

soon be gone, yet its 260 odd years old. I didn't know this was going to happen to the barracks until I got the local paper the other week, or I'd have written before as I am as upset over the barracks being destroyed for flats as I am upset at seeing St Barts hospital closed & boarded up. Left to rot. I hope St Barts Gate is not going the same ^{way} as the Barracks as my late fiance was in that hospital when he had his heart attack in the 1970's & St Barts was having a big Anniversary then, so it was very old back then its even older now. I do hope you do not mind me writing but I just had to tell you my feelings on this flooring development thing.

for Medway.

Please please please do not destroy

Medway like this.

I was born here. my parents mother & Father was born here as was my Grandfather & Grandmother. & possibly my family before them etc. It breaks my heart to think of Medway turning into giant blocks & blocks of flats.

Thank you for reading this

Yours Faithfully

Barbara Towns

P.S. please forgive bad writing & mistakes I have a childhood strained muscle injury which is painful & causes right problems

Dear Sir/Madam,

Thank you for your recent consultation.

Background.

Medway Councils failure to produce two core strategies is clear evidence of a total failure of its plan making function. It is against this backdrop of significant failure that this consultation takes place.

Medway Councils inability to allocate land for development have led them to a point where their Housing land supply is so grim they grant planning permission on unallocated Greenfields for fear of losing appeals. It gives me no pleasure to see local residents fighting housing developments they have no hope of winning. Many local residents report how they see the economic performance of Medway continue to decline by lack of an economic strategy that could be delivered in an adopted Local Plan if they had one. It is not acceptable that Medway are relying on ad hoc, speculative development that does not make the most of their areas potential and lacks co-ordination and limited buy-in from local people.

Introduction

The document presents a number of topic based descriptions of issues about growth in Medway. It presents at para 3.1 Objectively Assessed Need (OAN) for housing Employment and Retail. The document describes a vision for 2035 and outlines Strategic Objectives for Medway. It presents 4 alternative scenarios for growth.

Without further details it appears if Medway is trying to claim that they may not have enough land to meet their development needs over the plan period? If so they simply have to release more least environmentally sensitive land which they have plenty of. The council may have to use greenfield land that is not totally free from environmental constraints.

Evidence.

There appears to be a significant amount of important evidence missing from this consultation. Which questions the validity of the options generation process. This lack of evidence and short fall of sites for each scenario is recognised throughout the document for example:

Further work will be carried out to assess the ability to deliver growth, taking account of detailed infrastructure planning, viability testing and environmental and economic considerations. This will be informed by the representations made in the consultation on this document and development options. (I&O2 para 34)

Alongside the consultation documents, the council is collating a comprehensive evidence base to inform the content and direction of the Local Plan. These include:

- Strategic Housing Market Assessment, 2015
- Employment Land Needs Assessment, 2015
- Retail Needs Assessment, 2016
- Integrated Growth Needs Assessment, 2016
- Iterative Sustainability Appraisals and Habitat Regulations Assessment at key stages of plan preparation
- Viability appraisals

- Strategic Land Availability Assessment, 2016 and now (2017)
- Strategic Transport Assessment
- Infrastructure Delivery Schedule and Plan
- Village Infrastructure Audit
- Green Belt review
- Landscape Character Assessment update
- Green Infrastructure Strategy

As a fundamental precursor to options generation the evidence should identify whether sites are suitable*, available and achievable/economically viable. Only sites that are all three should be considered as reasonable alternatives. This preparatory work needs to be done first before scenario's are produced. Work carried out on the 4 scenario's so far appears unconvincing.

*The SA when it is produced may help to identify suitability in terms of environmental constraints. However, Medway should not rule out all sites that have environmental constraints. If they think they don't have enough sites to meet development needs they should re-examine and release the least environmentally sensitive land to meet development needs first, before releasing higher quality land which they might very well have to do.

With so much evidence missing and recognition that not all the sites deliver sustainable development can the 4 scenario's represent realistic alternative options? If they cannot be delivered, it is not at all obvious why they were chosen, which questions the validity of the options generation process.

Developing a vision for 2035.

Whilst, by 2035 Medway might be noted for its stunning natural...assets and countryside, it will be less so 'stunningly natural' if it builds on and removes the SSSI at Lodge Hill.

Strategic Objectives

Many of the Objectives as set out at paragraph 2.39 are not specific to Medway and could be anywhere objectives. They need to be more specific and focused for Medway

More worrying is at para 3.3 of the cabinet report (20th Dec 2016) there is a shortfall between identified sites and overall housing need. Without contingencies the possible removal of Lodge Hill from the housing supply may exacerbate the shortfall of housing sites. It would appear that all 4 scenarios are reliant on Lodge Hill for 3,000 homes. Has the Council thought of a contingency?

Lower Thames Crossing. At the time of writing the impact of this is still to be modelled.

Duty to cooperate.

Has Engagement been Constructive from the Outset?

Has Engagement been Active?

Has Engagement been On-going?

Has Engagement been Collaborative?

Has Every Effort been made to Secure the Necessary Co-operation?

Has Engagement been Diligent?

Is the Evidence Robust?

Has Engagement been of Mutual Benefit (the broad outcomes)?

There is a list of Strategic priorities that demonstrate that the Council knows what some these are.

Viability Assessment where is it?

Development of larger planned settlements

Medway suggest that the scale of growth projected for Medway also indicates that the council needs to look more widely than just considering incremental growth around the edges of towns and villages in appropriate locations. Thought must be given to larger planned settlements that can deliver a mixed development of homes, services, infrastructure, green spaces, shops and jobs. (Para 3.15 I&O2 document)

However, the SHENA suggest that whilst the major brownfield sites are a major part of the future supply they are complicated and expensive to develop and in many parts of the area this challenges development viability. Therefore, it will be risky for the majority of supply to lie within large, complex sites and a mixed portfolio will be needed to support delivery in the short, medium, and long term. (North Kent SHENA Appendix 2 (Medway IGNA Technical Paper) Nov 2015 pp10)

It is unclear what Medway are proposing when it says 'larger planned settlements' in its I&O2 document. As stated in the SHENA it is questionable if the Council's strategies will be successful if they are reliant on large complex sites.

Alternative options.

Scenario 1. Maximising the potential of urban regeneration (17,500 homes)

The council will increase the rate of development in urban areas, including: building at higher densities in appropriate locations, seeking land consolidation to bring forward bigger development sites, and bringing mixed development into retail and employment areas. No details have been given as to how viable these proposals are. Indeed as with scenario 4 there is caution in identifying land at Medway City Estate and Chatham Docks for significant residential developments due to the complexity of these sites (Para 3.41 I&O2 Document). Why is it being put forward?

The council acknowledges that there are a number of risks in such an approach, including the ability to deliver within the plan period, potential loss of overall employment land supply, securing infrastructure and services to support growth at this scale, viability of building at high heights, and difficulties in providing the full range of housing that the market requires. (Para 3.26 I&O2 Document)

Without further details and evidence, it is difficult to see if this scenario is a reasonable alternative. Housing figures are shown but it is unclear what these figures actually represent.

Scenario 2. Suburban expansion (15,700 homes)

Many of these sites are subject to environmental constraints or lack the infrastructure and

access to services that would be required for sustainable development. (Para 3.28 I&O2 Document)

There is no consideration of, infrastructure planning or impact on the natural environment which is needed to determine the capacity of these areas to accommodate growth. (Para 3.29 I&O2 Document)

The potential scale of pressure on the highway network may require new transport schemes that cannot be supported on environmental or viability grounds, and this may constrain the scale of development capacity in these areas. (Para 3.29 I&O2 Document)

There is no Green Belt review that supports this scenario. (Para 3.30 I&O2 Document)

Development close to the borough boundaries could have implications for neighbouring towns and villages and countryside, and the council will need to have regard to discussions with adjacent authorities in Kent, Gravesham, Tonbridge and Malling, Maidstone and Swale. (Para 3.31 I&O2 Document)

If this is not resolved there is concern that the duty to cooperate may not succeed.

With so little going for it and without further details and evidence it is difficult to see if this scenario is a reasonable alternative. Housing figures are shown but it is unclear what these figures actually represent. Why is this scenario being put forward?

Scenario 3. A rural focus (15,410 homes)

Growth at this scale would inevitably change the character of Hoo and its surroundings. Such scale of growth would inevitably have an impact on the environment and the countryside character that borders the villages on the peninsula. (Para 3.34 I&O2 document)

Attention needs to be given to: Landscape features, separation of urban rural, wildlife, green spaces, country parks, services, facilities, infrastructure and in particular the road network. Public transport and strategic transport network. At the time of writing no assessment has been put forward to describe any of the above matters. (Para 3.35 and 3.37 I&O2 document)

In generating this scenario the Council has paid little attention to the significant change for the Hoo Peninsular. Housing figures are shown but it is unclear what these figures actually represent.

Until more detail is supplied it is difficult to see what impact this Scenario would have on the character of the area and whether or not it should have been put forward as a reasonable alternative.

Scenario 4. Urban regeneration and a rural town (18,650 homes)

This Scenario states that there is caution in identifying land at Medway City Estate and Chatham Docks for significant residential developments due to the complexity of these sites (Para 3.41 I&O2 Document). Why is it being put forward?

There is no consideration what acceptable level of suburban expansion is necessary that prevents urban sprawl whilst supporting service provision and jobs on the Hoo peninsular.

Once again this scenario has paid little attention to the significant change for the Hoo Peninsular and what could be delivered at key regeneration sites. Housing figures are shown but it is unclear what these figures actually represent.

Until more detail is given it is difficult to assess if this scenario is a reasonable alternative.

Summary

None of the scenarios provide costed /deliverable infrastructure to support them. There is no highways evidence or modelling presented. No real assessment of impact on the environment. With so much evidence missing it is difficult to understand what Medway are proposing. It is difficult to assess how sustainable each scenario is, let alone compare them. I doubt that some of the scores in SA objective 4 and 8 in all 4 scenarios is merited. The loss of an SSSI is likely to have a significant negative impact.

General comments.

All Scenarios include the development on the SSSI at Lodge Hill.

If Lodge Hill is not confirmed by the Sec of State, how will the shortfall in development be made up in each Scenario? If amended will the options need to be reassessed in the SA/SEA and will there be a need for a further period of consultation? This could unnecessarily delay the plan making process.

More worrying is the suggestion that Medway¹ might reduce its development targets in the Local Plan. This would impact on the plan's ability to meet Medway's development needs. They state that at that point they would make requests to neighbouring areas to meet unmet housing need outside of the borough boundary. Maybe they should be making those requests now under the Duty to Cooperate.

The historic under delivery of housing in Medway is a severe problem. Has viability testing been done on the housing supply as shown in the table at para 3.7. It shows an annual delivery rate 2012-2013 of 545 dwellings. Is it realistic to deliver 29,463 dwellings over the plan period of 15 years with a delivery rate of 1964 dwellings per annum? A figure which is 4x the previous delivery rate. A figure Medway's housing market has never come anywhere close to deliver.

It is not clear how many dwellings at Lodge Hill are relied on in the plan period. In the AMR 2016 table Section 8 Residential Pipeline Sites show the majority being delivered 2030+ (4550). This is still within the plan period.

¹ Para 4.29 Interim sustainability report March 2017

Housing Trajectory. SHLAA Jan 2017

Year	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	0-5 yrs	6-10 yrs	11-15 yrs	16+yrs	TOTAL
Large site apps (as at 31/3/2016)	-	-	-	-	583	893	895	884	736	3991	1543	390	24	5948
Small site apps (as at 31/3/2016)	-	-	-	-	112	63	97	13	16	301	2	-	-	303
MLP Allocation	-	-	-	-	0	0	9	108	171	288	18	5	45	356
2017 SLAA pipeline sites	-	-	-	-	0	0	45	227	626	898	2421	731	2089	6139
Extant SLAA sites that received permission between 1/4/2016 and 31/12/2016	-	-	-	-	-	18	-	-	60	78	350	31	-	459
Windfall allowance	-	-	-	-	-	-	202	202	202	606	-	-	-	606
TOTAL					695	974	1248	1434	1811	6162	4334	1157	2158	13811

pp21

At para 3.3 of the cabinet report 20th Dec 2016 it states that up to 30,000 new homes are needed over the plan period. The Housing Trajectory above shows 13,811 dwellings in the pipe line. If this is correct Medway have a significant short fall of more than 50% of its housing requirements.

The Council as a part of the SLAA process has identified wider spatial options to be included in the SLAA to allow for larger comprehensive developments to come forward. In some areas, these are adjacent to SLAA sites submitted and in addition to them, but also represent potential for extensions to villages and urban areas in Medway. This process has identified 21 sites.

The council has included these areas as part of the potential spatial options for consultation in the Medway Local Plan Development Options document. Initial work has been carried out to assess the development potential of these strategic locations for residential, employment, retail, infrastructure, open space and community uses. This work has identified a number of constraints in such areas, including the best and most versatile agricultural land, infrastructure dependencies and impacts, landscape considerations, and potential viability and deliverability challenges. These constraints have been recorded in the SLAA assessment as impacting on the suitability of sites. The wider work on the Local Plan, including the Development Options consultation and iterative Sustainability Assessments, will determine which locations and approaches to development represent the most sustainable strategy for Medway's growth to promote in the new Local Plan. (SLAA 2017 pp8)

However, none of this evidence is available on the Councils website at the time of writing other than a simple SLAA table and SA. It is difficult to understand why some sites are acceptable and other not. This is important given how this assessment feeds into the generation of growth options. Furthermore the quality of the SA assessment leaves a lot to be desired and the scoring in the matrix is inconsistent.

As a presentation matter it may have been better to look at smaller local areas and identify different realistic options for growth. This would have enabled a mix and match approach to selecting the preferred option. For example there may be 4 different options for Rainham Town Centre and land east of Rainham. It may have been better to focus on these 4 options. Similarly for land around Capstone etc.

The way the alternative options have been described is quite ridged. A more flexible Local area based approach may be needed if an appropriate option for the whole of Medway is to be identified.

There is clearly a contradiction that states that the regeneration of Chatham is central to the success of Medway's development. Yet identifies other areas in close proximity for significant retail and mixed use provision that would compete with Chatham.

If master plans are to be produced for major residential schemes in broad locations identified in the Local Plan where are these locations and how much development will be identified for them including infrastructure and service provision?

At para 10.37 (I&O2 document) it states that viability work will be carried out to determine an appropriate approach in the draft Local Plan, based on an assessment of the viability of the preferred development strategy, which will identify the locations, scale and mix of development across Medway. If viability of sites is to be tested only for the preferred option to see if they are suitable for development then all sites need to be tested in all of the 4 scenarios. If this is not done then there has not been an equal examination of the alternatives.

In the policy approach to Implementation and Delivery pp92 it states that an infrastructure Deliver Plan (IDP) will be prepared. If Medway have stated that infrastructure is essential to development should it produce an IDP as part of the local plan process including the assessment of the 4 scenario's?

Conclusion.

At this stage the Council have put forward 4 options for growth. Medway fails to state how much land is actually available/unavailable for these alternatives. There is no examination of viability, infrastructure or services, impact on the highways network locally or nationally.

The options would require a calculation of capacity for Housing land, Employment land, retail, infrastructure, transport, service, impact on the countryside, etc, etc. for 'all' the options. Medway states that it will only be carrying out a viability study of the preferred option. (para 10.37 I&O Document 2017)

This is important given the High Court challenge in both *Heard v Broadlands and Cogent Land LLP v Rochford DC*. According to Ouseley J para 71:

It is appreciated that, although there is a case for examination of a preferred option in greater detail, the aim of the SEA Directive, which may affect which alternative it is reasonable to select, is more obviously met, and it is best interpreted as requiring, an *equal examination of the alternatives*... even at the outset...

So far there is a significant lack of evidence and the scoring in the SA leaves a lot to be desired. Unless this is put right there is a risk that the preferred option could be challenged.

If Medway follow this approach it is unclear if they can set out an appropriate strategy for the area.

Way forward.

Putting Lodge Hill to one side, it is inevitable that Medway will at some point allocate land of greater environmental and agricultural value than it would like. It should not duck politically sensitive options for growth.

At the moment Medway may be saying it is self-contained in terms of the supply of development land. But not if Lodge Hill fails again. So, until enough suitable land is found it is unclear if an appropriate strategy has been set out.

It is a pity that Medway have not developed the evidence base or the Duty to Cooperate adequately before committing to Public consultation. It is equally disappointing that Medway have not developed any of these scenarios to a reasonable level of maturity to enable a proper examination to be made by the public.

From:

Lt. Col.(Retd.) & Mrs. F. R. Beringer

4th. April 2017.

To:

Medway Council

The Medway Council Local Plan 2012--2035

We write concerning the new plans as outlined in Medway Local Plan 2012__2035.

Broad Concept

We, who live on the Hoo Peninsula, realise we are a relatively small community with not a great voting power or influence in the Medway towns. We seem to be fair game for people from outside as a place to develop their pet projects. The proposed developments of 'Lodge Hill' and Hoo St. Werburgh as towns would act like some great cork in the bottle of the Peninsula, effectively sealing us in. There is already great pressure on all the services in our area ___ medical, schools, transport, road traffic /pollution, social and industrial___ and we are low in the priority list of our Council for improvements.

Our Peninsula has more than its fair share of developments. Hoo St. Werburgh has already been expanded at an alarming rate. High Halstow has had two new estates added since we came to live here many years ago. Allhallows has also been developed and there have been large new estates built at Wainscott. Of course we also have power stations, an old oil refinery, and tank farms and so on the Peninsula.

*Lodge Hill is not really a 'brownfield' site. Like most military areas, flora and fauna flourish there. It could be developed imaginatively as a place of recreation, as a welcome break from the concrete jungle that is now the Medway towns or, better still, provide a convenient site for a **second** very much needed hospital, but avoiding the nightingale terrain.*

Community

- **Access to Hoo Peninsula**

The A228 is the artery to the Hoo Peninsula. If that artery is blocked or congested, there could be dire consequences for the safety of those of us living on the Peninsula. We do live in an area of several potential safety hazards.

- *During construction (over several years) there will be congestion and obstruction on the main road at the Wainscott roundabout and particularly on Dux Court Road. There is considerable congestion at the former already.*
- *Public transport to the Peninsula is already inadequate. This situation will be exacerbated.*
- *Medway Hospital is already overstretched. The addition of large towns at Lodge Hill and Hoo St. Werburgh would place an intolerable burden on Medway Hospital, no doubt resulting in even longer waiting times, or, worse still, an even greater need for cancellations for appointments with consultants or operations.*
- *Our present medical practices on the Peninsula are already working at full capacity. They will be overstretched during any development period (which could stretch over years).*
- *It is hard to see how present education facilities will cope with such a development.*

Economy

It is difficult to see how such developments can be prevented from becoming commuter towns. It is easy to visualise these new developments becoming part of one large formless conurbation of Strood.

- *Would there ever be sufficient finance available for the necessary ongoing upkeep (e.g. road maintenance, already inadequate, etc.) of the already existing villages? They could fast become the poor relations.*

Environment

- *Lodge Hill is not truly a brownfield site. It would be much more enlightened and environmentally friendly to develop it in keeping with the other protected environments on the Peninsula to make it a coherent wild life area for visitors.*
- *To remove this potential 'lung' (i.e. natural unpolluted green area) would be detrimental to the general health of the area. There are few enough 'lungs' in Medway at present.*

Transport

- *Public transport to the Peninsula is already inadequate. The introduction of large towns in the proposed locations could only be to the detriment of the present system and increase the already considerably heavy-weight traffic on our roads.*

Character

- *Despite the industrial development already on the Peninsula the area has a strongly quaint and relatively unspoilt rural atmosphere of its own. The farming community still has a strong influence on community life. In our view, these towns would destroy the rural character of our area.*

Conclusion

You will see that we are completely opposed to the proposed developments as they stand and trust that these views will be taken into account. However we appreciate that extra housing is urgently needed but much could be done by asking individual councils to actively involve/consult their local residents in order to come up with further suggestions as to where extra houses could be best and most acceptably sited within their own boundaries.

We would emphasise the following major concern:

- *We have a nationally important SSSI in our midst. We should all seek to preserve not destroy it.*

Fred & Hazel Beringer.

[REDACTED]

From: Jeanette Drayton [REDACTED]
Sent: 04 March 2017 16:54
To: futuremedway
Subject: FUTURE SHAPE OF MEDWAY

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon

Our main concern with the proposed building of houses, in Medway is the fact that no mention is made of any medical facilities. As it is now we only have one hospital which has a very big catchment area, covering hundreds of thousands of people, how do you expect Medway Maritime to cope with an influx of thousands more people, this hospital is already in special measures so we would have thought this would make their situation impossible. We need another hospital badly, or even several medical centres, like the Will Adams centre, which can do minor ops and procedures thus alleviating pressure on the hospital. Its bad enough now to get an appointment at the hospital and also the car park is insufficient to cope with the number of people now let alone more in the future.

We only have one surgery here in Lordswood, and again similar to the hospital its very difficult to get an appointment.

Another aspect we are concerned about is the traffic situation. The roads around Lordswood, Walderslade, Bluebell Hill are already congested especially at peak times. There should be an entry/exit from Walderslade Woods Road onto the M2 to alleviate the congestion at Bluebell Hill roundabouts.

Thank you.

Mr & Mrs Drayton

Sent from my ipad

[REDACTED]

From: Chris Eden [REDACTED]
Sent: 17 January 2017 11:50
To: futuremedway
Subject: Feedback on the Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

The Medway Towns are already massively overpopulated and in the last twenty years we have lost way too much open land and green spaces. There should not be any plans to increase housing in the area. There should only be plans to revitalize some of the run down areas.

Regards,

Chris Eden
[REDACTED]
[REDACTED]

[REDACTED]

From: Ted Smith [REDACTED]
Sent: 01 March 2017 14:55
To: futuremedway
Subject: Local Plan 2012 - 2035

Follow Up Flag: Follow up
Flag Status: Completed

Mr Edward Smith
[REDACTED]

Dear Sirs,

Local Plan 2012 - 2035

My objections to Expansion of Hoo to solve the housing crisis.

- 1) There will be an acute shortage of farmland in UK. UK is running out of land for food and faces a potential shortfall of two million hectares by 2030 according to new research. The report, from the University of Cambridge in 2014, says the growing population plus the use of land for energy crops are contributing to the gap. Overall the UK runs a food, feed and and drink trade deficit of £18.6bn. The total land area of the UK amounts to over 24 million hectares with more than 75% of that used for farming.
- 2) Medway Council in the past has stated the importance of retaining the rural aspect of Hoo to act as a backdrop to the housing on the other side of the river at Gillingham especially.
- 3) Hoo has already taken a huge hit in the number of new-builds in the last eleven years resulting in a large increase in population with negligible change to the infrastructure. The new-builds are continuing at an alarming rate because the developers have taken advantage of the lack of a local plan. The council did oppose the recent application west of HOH school also stating that it would upset the balance of the village centre
- 4a) Transport. There seems little sense in building huge swathes of housing in Hoo with only two local crossings of the river to access all of the main services on the other side including, medical services, Council Offices, Police Station, retained fire fighters and specialist equipment, the main leisure facilities (Hoo has just lost important leisure facilities to more housing at the top of Bells Lane). All of the main educational facilities for older pupils are on the Gillingham side of the river. The main retailers like B and Q have established themselves in Gillingham with very little this side of the river.
- 4b) Transport. Whatever is done to improve the junction at the bottom of Four Elms Hill will not address the upcoming problems of traffic from the Peninsula sufficiently. Apart from the increase of car traffic (whatever the developers and council say about encouraging other uses of transport people will always turn to their cars), there is also the increasing commercial traffic namely from Kingsnorth Industrial Estate, the new warehousing at Damhead Creek, the building of Damhead Creek 2 and whatever replaces Kingsnorth Power Station, and for the next ten years the quarry traffic at Kingsnorth. There has also been several

accidents of late on the Peninsula Way which are only likely to increase in frequency. Any substantial traffic from the Peninsula will probably have a detrimental affect on traffic from the expanding population in lower Gillingham trying to get to work in London.

5) **Quality of life.** The rural quality of life will be destroyed for several thousand people in the Hoo vicinity. Also, surrounding the existing village with housing will have a huge impact on the traffic problems in the village centre and the old roads where there are already many problems caused by through parking on roads especially to large vehicles like the local bus service.

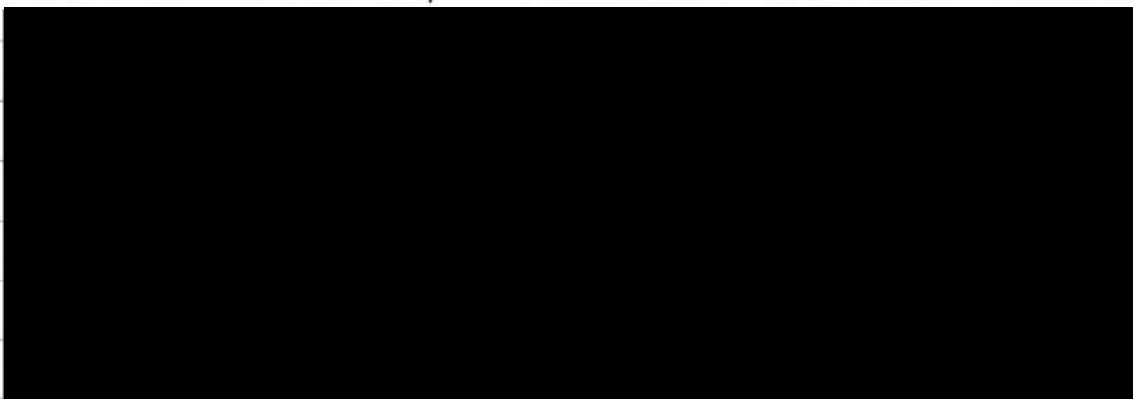
6) **The Government White Paper states that greenfield sites should only be built on when brownfield sites are exhausted.** Surely the various brownfield sites in Medway should be utilised to the full with housing.

I am 76 years old so it is not a case of being a NIMBY.

Yours faithfully

VIEWS FOR THE LOCAL PLAN 2012 - 2035

1. The area of Hoo St. Werburgh is already poorly or just sufficiently served in so many respects.
2. Any development of Lodge Hill would over-stretch existing resources, require a huge input quite apart from being undesirable from other points of view and fact.
3. Compared with surrounding estuary flat-lands Lodge Hill is a place of contrast, natural beauty and ecological interest spoilt forever by development with buildings etc.
4. Ample brownfield sites exist in the Medway area to accommodate proportionately HMGs wish list for new housing of all kinds.
5. Housing, industry and commerce has requirements either met just about sufficiently or less than adequately, if at all. In several areas these include:-
 - (i) Land drainage;
 - (ii) Supplies of gas, electricity and clean water;
 - (iii) Disposal of sewage and other waste;
 - (iv) Community care needs
 - (v) hospital care including ambulance services
 - (vi) doctor and dental services
 - (v) police services
 - (vi) fire services
6. In addition to the foregoing there is;
 - (a) Inadequate access to the peninsula by road with its increasing demands by HGV and other commercial traffic as well as private traffic;
 - (b) deteriorating road surface, liable to damage vehicles;
 - (c) inadequate parking at meeting points, such as shopping areas;
 - (d) inadequate retail facilities in the Hoo area; and
 - (e) lack of recreational facility including sports facility.
7. I do not oppose development if facilities are sufficiently improved.

8. I do not oppose development of greenfield areas when all possible brownfields sites have been used. Developers prefer greenfield sites as they cost less to develop which is not reflected in the price of ^{newly} developed areas.
9. To develop even more without proportionately increasing essential facilities is to compound existing problems requiring much, much greater input later if decay is to be avoided.
10. The presence of industry in and around Hoo has already created poor quality air from industry and heavy traffic output. This need curing now as some emissions are persistently illegal.
11. On an island, land is a finite resource and its use therefore deserves its most careful consideration in the long term. By "island" I mean England.
12. We are guardians ~~as~~ trustees of all resources for the next generations. There is no room for myopic plans or quick unconsidered action. I say this with courtesy and respect to planners on whose wisdom I hope to rely. HMG must stop building up debts, but fund adequately each year.
- 

10 II '17

MEDWAY LOCAL

PLAN NEW HOUSING.

5th March 17

To Whom it may concern,

It amazes me that we could ever consider building so many new houses in this area. The Medway towns is already bursting at the seams with the number of houses built over the last five years.

Left to the politicians and local government this will be a terrible place to live. already we have too many cars, traffic jams, everywhere. Car parks are full

The Medway Hospital does a magnificent job but they can't be subjected to more pressure by more people. The local G.P. surgeries can't cope (try to get an appointment) Surely common sense must prevail and there

07 MAR 2017

2.

building in this area partitany
on the peninsula;

I know that the local Councils
are under pressure from central
government but we cannot cope
with a further influx of people and
cars. We are spoiling what was a
wonderful place to live.

I know that I speak for a lot of
people who feel as I do. but their
voices are not heard.

They said have your say. and this
is my opinion.

Many Thanks,
Yours faithfully,
Norman Latimer,

[REDACTED]

From: Robert Shipley [REDACTED]
Sent: 16 January 2017 16:27
To: futuremedway
Subject: RE Medway Council Local Plan 2012 -2035

Follow Up Flag: Follow up
Flag Status: Completed

Dear Medway Council (Planning Policy, Regeneration, Culture, Environment and Transformation)

The Medway Towns is Not a City it is a Collection of Towns in the County of Kent brought together Administratively through Not Always with local support as in the case of Gillingham Kent and should Not be Referred to as a City.

The Towns Chatham Gillingham Rochester and Strood have their own Histories and Identities and that should be Respected
Not Smothered in a Bland " Medway " Mash.

A Common Sense Approach is to Protect the Rural Green Areas wherever around Cuxton or the Hoo Peninsular for the Benefit of Local Residents and Wildlife as Visitors Not always want to see a Concrete Morass but instead Appreciate Greenery.

Equally Empty Buildings (Including Office Buildings) in the Urban Areas Chatham Rochester Gillingham and Strood Need to be put to Usage for Residential Housing Purposes such as Canal Road Strood and for Instance the site of what was the Civic Center at Strood could also be put to Usage For Housing Purposes by building either Houses or Flats .

Brownfield Sites Need to be the Priority For any future Building of Residential Places taking of course the Need for Green Spaces in Urban Areas as Well .

The Riverside Country Park Definitely Needs to be Protected for Present and Future Generations

The Council should Always Press National Government to Scrap any Housing Building Targets which are Devastating to the Environment and Quality of Life for Local Residents and instead concentrate on Empty Places including Offices

Agricultural Land such as around Ranscombe Farm Also Deserves Protecting

Your's Sincerely

Mr Robert Lee Shipley

28th February 201

Dear Sir/Madam,
After having studied the Development Options,
I wish to inform you of my opinion.

Firstly, I wish to make it known that as far as I am concerned the Medway Towns is now at breaking point. We cannot cope with the current population, let alone adding to it!

The reasons are:-

- 1) Medway Maritime Hospital is unable to cope now as you are well aware - it is already not large enough to support the current population. Even if another hospital is built, where will all the new nurses and doctors come from?
- 2) It is fine to say you will provide new Doctors Surgeries, but I have no idea where these new doctors will appear from - a number of local Surgeries are already struggling to cope as doctors leave, retire etc. and there aren't enough new doctors coming through to replace them. My Surgery, Kings Family Practice, in Chatham has a notice saying they are struggling to replace doctors and are currently shut Thursday afternoons so to say that doctors should work longer hours isn't practical or possible at all.
- 3) We will need new transport links which I don't believe you can actually provide - new road that will cut a swathe through the little countryside & green belt we have left. Also public transport isn't up to scratch, there is nothing done to encourage people to use it & consequently there aren't good enough

Services provided anyway.

4) The number of houses supposedly needed will mean, in general, twice that number of cars added to our roads - where is this traffic all to go? Where will everyone park? The roads are clogged up now with cars and people struggle to park.

5) Gas, electricity & water:-

How will you be able to sustain the extra supplies that will be needed to provide for the thousands of houses you intend to build? Over the last few years our water table has been of concern and we are already conserving water.

6) Schools:-

How can you possibly guarantee that even if you build more schools, you will be able to provide the teachers needed?

Now - Concerning your Development options:-

I do not approve of scenario 2, 3 or 4 as these all mention Lodge Hill, Chatterdon, and as Lodge Hill is an SSSI - your plans defy national planning rules for protected wildlife sites as well as destroying the Nightingales last stronghold in the U.K.

The R.S.F.B, KWT, Friends of North Kent Marshes, Medway Countryside Forum, Butterfly Conservation & Woodlands Trust all oppose development at Lodge Hill. As our Council you should be thoroughly ashamed of the fact that you have ever put this on your agenda and are trying to destroy the S.S.S.I Status and have taken it to the Government - I now

have no trust in you as my local council because of this.

There are other factors in Scenario's 2, 3 & 4 that I disapprove of, namely regarding loss of Green Belt land, which we should not be able to build on.

This only leaves Scenario 1.

I have to consider that of the options you have given, this, IF I had to choose an option, would be the least destructive to firstly wildlife (ie. does not include Lodge Hill) and not so much Green Belt land would be taken and more Brownfield Sites would be used.

My big question is - if you do not get approval to build at Lodge Hill, there appear to be no options but one left anyway - do you know something that we don't?

Finally, I wish to state that I am extremely worried about the need to build all these new houses as not enough will be affordable - the percentage is too low. All that will happen is that people from outside Medway will buy them and also will probably be put up for rent. Our younger generation have been sold down the river - they cannot get on the housing ladder as houses are ridiculously extortionate to buy and they need a large deposit and wages are low but renting is so expensive that they cannot then afford to save for their own property!

I believe the Majority of the housing should be affordable and for local people only and we should also have Council Housing as we used to do until they all disappeared in the 1980's.

It seems to me that the young people of Medway will still be left in the same position, while outsiders gain all the benefits.

Yours.

[REDACTED]

MRS CAROL M. PUTTOCK



[REDACTED]

From: Phillip Hilton [REDACTED]
Sent: 05 March 2017 02:30
To: futuremedway
Subject: BAE Club site development

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam,

Yet again Hoo is being proposed to be bombarded with more developments.

We have had a distinct lack of infrastructure for many years but houses seem to be continually built in this area. It is difficult enough now to get a doctors or dentist appointment. Not to mention that ultimately this will impact on Medway hospital which was never designed to cope with the quantity of residents it has now without any extra! Many services have been compromised by continual building but lack of facilities. The water pressure in this area has deteriorated, the sewage often leaks down Four elms Hill due to demand. Parking in this area is ridiculous, the emergency services have often experienced vehicles parked on both sides of the road due to lack of adequate parking facilities. I find it unbelievable that there are only a requirement of 1 1/2 parking spaces per house considering that the majority of houses have at the very least, 2 cars per household!

The people who live in Hoo St Werburgh want to keep it as Hoo St Werburgh, not part of any other town or village. Hoo St Werburgh was a very close nit community many years ago with very low crime rate. Since being extended by thousands, the police force has been removed locally but the crime rate has increased enormously since a continual influx of residents.

I'm also aware of many pupils on the waiting lists for schools in this immediate area.

There are too many reasons to list as to why this is not a feasible project.

Regards,
Mrs Hilton

Sent from my iPad

MEDWAY'S LOCAL PLAN

Mr Alan Jewett

Here are a few Points regarding the House building at Chatterdean & A New Hospital.

These are very important Views.

1. Build a Purpose Built Hospital.
2. Giving proper Parking for Staff and Visitors.
3. Paramedics find the access an Victorian Streets very difficult.
4. They then would not be entering the existing hospital.
5. If you build more houses ~~are~~ where will the extra sick go.
6. Pull the hospital down and put the houses where the houses are.
7. You could then have a Crematorium & Hospice on the same site.

I do feel very strongly about this -

I am full of admiration for the Staff

at Medway as they are working so hard
No one even seems to say Well done -
well I am. But we need a
New Hospital.

Thanking you

Yours Sincerely

Jim Howard



A Response To The Medway Council Local Plan 2012-2035

By Natasha Steer

16/4/2017

Overall I am very impressed by the Consultation Report and in particular the approach towards affordable housing and the recognition of wellbeing being connected to green spaces and environments. I personally support Scenario 4.

I would like to respond to a paragraph in the [Medway Council Local Plan 2012-2035, Executive summary, page 3](#) (last paragraph) in order to respond to the Local Plan as a whole. Although a small sentence, I feel that within development of a city, the importance of engagement and positivity is related to much more than whether an area's physical image improves.

“Development and regeneration to help establish Medway as an attractive city and counteract the unfair negative perceptions of the area can also help to boost the economy by making it more attractive to businesses.”

Does regeneration improve community cohesion and counteract negative perceptions? Often within area of poverty there will also be a lack of engagement, and likely as you will find in the response to this Local Plan consultation, a large amount of people feel disenfranchised due to not having been consulted in regards to regeneration under previous Government arrangements.

The contact made with community groups and the use of a co-productive model is essential for innovative city planning.

“To move from the more traditional city to a more imaginative one requires thousands of changes in mindset, creating the conditions for people to become agents of change rather than being passive recipients or victims of change.”

(The Creative City, Charles Landry)

The local creative and voluntary sector need to be considered as a core source of service design and community engagement. There is an expanding arts community in Medway that needs to continue to feel involved in the regeneration/redesign of the area and many of the creatives and innovators work within community engagement. When talking about ensuring 'improving residents' health and wellbeing, and caring for the environment it would be essential to make sure the groups already doing this are supported in being able to develop their services further.

An alternative approach to caring for new and existing communities also has the potential to make Medway a lead on innovative partnerships. In Rotherham a partnership between the voluntary sector and the CCG has meant a saving of £500,000 over 3 years. (*Just what the doctor ordered. Social prescribing – a guide for local authorities. May 2016*). A similar project is newly underway in Medway called " Involving Medway" which will look to connect the Voluntary Sector with the Medway Clinical Commissioning Group.

Medway has a strong creative arts scene, I would say generally due to deprivation (for instance the Dockyard Closure 1984) bringing in response, innovation. This scene has created a strong community cohesion that is very unique to Medway. It does not just consist of art based activities, but using creativity as a tool for well-being and education. Rather than creating out of town innovation areas, mixed use spaces create space for the creatives and larger businesses to work together. Local creatives are working with the Medway Dementia Action Alliance for example, to make Medway a Dementia friendly city.

"It's important to recognise and provide people with the feeling that they're better off functioning as economic assets at the heart of the community and that they can be provided with the opportunity to both borrow from and build on their local social capital. This is something that needs to be acknowledged and communicated right at the beginning of any intervention and not at a later stage. However, there is no one way of doing things; regeneration takes an

enormous amount of hard work and patience. I've learnt as much how to kill off social capital as to how to build it. The things that ruin social capital include a precarious labour market and a very insecure housing market. These are both ways that make it very difficult for people to participate and contribute".

(Reaching out a helping hand: identifying and enfranchising the impoverished in Britain's urban neighbourhoods, Julia Unwin CBE AoU)

Boosting the local economy and attitude of the community is not solved through encouraging large investors to Medway - which only disengages communities and gentrifies areas. Providing spaces and buildings for start-ups, charities, CICs alongside larger business investors means that local residents can take a vested interest in the local economy.

"The trend over the past 50 years, in the innovation sector, has been set by places like Silicon Valley – suburban corridors of spatially isolated corporate campuses, accessible only by car, with little emphasis on the quality of life or on integrating work, housing and recreation.

A new contemporary urban model is now emerging, giving rise to what the Brookings Institution is calling 'innovation districts or villages' which by the Institution's definition are;

"Geographic areas where leading edge anchor institutions and companies cluster and connect with start-ups, business incubators and accelerators. They are also physically compact, transit accessible, and technically wired and offer mixed use housing, office and retail. Innovation districts are the manifestation of mega-trends altering the location preferences of people and firms and, in the process, re-conceiving the very link between economy shaping, place-making and social networking."

Innovation requires a symbiotic environment to thrive, it takes place where people come together, not in isolated spaces. Innovation Districts are where ideas are shared in coffee shops and hubs, rather than traditional offices, and businesses share ideas in communal spaces.”

(Lisa Addiscott AoU & Steve Robins AoU, Agenda For The Future Of Urbanism, The Innovation Ecosystem, 2016)

In conclusion, I would like to urge the Local Plan to include more in regards to empowering local communities and the voluntary sector - which in turn also saves the local authority substantial costs. Many charities, CIC's, places of education, health, culture, religion and heritage are already forming partnerships to benefit the residents of Medway: therefore it is important that Medway Council work with these partnerships to engage communities. The benefits of doing so naturally boosts the economy and the image of Medway whilst also building cohesion and improving the wellbeing of residents.

On a final note it is also vital that affordable housing is provided for those working in the above partnerships as well as those they seek to help - in order to avoid gentrification that can often be the result in a prospering community. I understand affordable housing is accounted for in Section 4 but I wanted to amplify the importance of this requirement.

Date: 18 April 2017
Our ref: 206265
Your ref: -



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

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
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CW1 6GJ

By email only, no hard copy to follow

T 0300 060 3900

Dear Catherine Smith

**Medway Local Plan
Development Options Consultation**

Thank you for your letter of the 17 January 2017 consulting Natural England on the Medway Development Options Consultation and the associated Sustainability Appraisal Scoping Report, the Sustainability Appraisal and the baseline documents, including the updated Strategic Land Availability Assessment.

Natural England has a shared objective with Medway of the Council securing a sound plan, that enables growth in Medway in accordance with the principles of sustainable development, and we are committed to working with the Council to achieve this objective. We are providing this consultation response to the Local Plan Regulation 18 consultation report (referred to below as "the document") and also the Interim Sustainability Appraisal (also referred to as "the SA") in that spirit.

Natural England recognises the challenges facing Medway in developing its local plan, and this consultation response and our ongoing engagement with you are aimed at helping ensure the vision within the Development Options consultation can be realised. The document states that *'By 2035, Medway will be a leading waterfront University city of 330,200 people, noted for its revitalised urban centres, and its stunning natural and historic assets, and countryside'*. To this end we support the document's statement that the scale of planned growth needs *'careful consideration of how Medway's environment and infrastructure can accommodate development that is sustainable.'*

Understandably, the proposed development at Lodge Hill is a key concern for Natural England and we have provided a specific section in our comments appended to this letter to address our concerns regarding this site.

Overall, our advice is that in order to meet the tests of sustainable development, alternatives to the proposed development of the site at Lodge Hill need to be fully considered and tested in the plan process. At present, we do not consider this approach has been properly developed. In keeping with our shared objective of ensuring Medway secures a sound local plan, we remain committed to working with the Council to ensure that sustainable alternatives can be identified to avoid the loss of a nationally important environmental asset. To this end, we would be pleased to work with the Council following this consultation to advise on the likely environmental implications of potential site allocations in relation to nature conservation, landscape and best and most versatile agricultural land.

For ease, we have provided our advice in four sections appended to this letter:

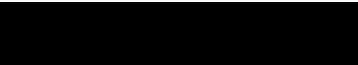
1. The Council's Vision for 2035 and Strategic Objectives
2. Proposed development and site allocation at Lodge Hill
3. Development Options Consultation Document
4. Sustainability Appraisal Scoping Report and interim Sustainability Appraisal

We recommend, however, that our advice in each section should not be considered in isolation due to the inherent overlap.

I trust these comments are helpful and we look forward to working closely with you over the coming months as you move towards a preferred options stage of the Local Plan.

For any queries relating to the specific advice in this letter only please contact Sean Hanna on 0208 0266 064 or by email to sean.hanna@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

A black rectangular box used to redact the signature of Patrick McKernan.

Patrick McKernan
Manager
Sussex and Kent Team

Natural England's detailed advice in relation to the Medway Development Options consultation

Natural England's advice is provided below. Given the potential implications for the Chattenden Woods and Lodge Hill Site of Special Scientific Interest from the Lodge Hill site allocation/development, our letter has been structured to include this towards the start of our response.

1 The Council's Vision for 2035 and Strategic Objectives

- 1.1 Natural England has a shared objective with Medway of the Council securing a sound Local Plan that enables growth in Medway in accordance with the principles of sustainable development. We are committed to working with the Council to achieve this objective.
- 1.2 Our focus is on ensuring that the importance of the natural environment is recognised and valued as a core element of the Local Plan. Medway has a wealth of environmental assets that are an essential part of the distinctiveness and character of the district. We aim to work collaboratively with the Council to help identify the benefits to the environment that can be obtained from sustainable growth, and secure opportunities for working at the landscape scale to create a stronger and more resilient network of environmental sites, in accordance with our (shared) statutory duties, Conservation 21¹: Natural England's conservation strategy for the 21st century, and Government policy.
- 1.3 We welcome therefore the Council's Vision for 2035 that: *'Medway will be... noted for its... stunning natural and historic assets, and countryside... defined by development that respects the character, functions and qualities of the natural and historic environments... to ensure that important wildlife and heritage assets are protected and opportunities are realised to enhance their condition and connectivity'*².
- 1.4 We also welcome this vision for the environment being further underlined by the statements that *'The environment is central to the ambitions for Medway's sustainable growth'*, and that the Local Plan *'will set out the Council's commitment to protecting biodiversity, valued landscapes and geological conservation interests'*³. We also recognise and welcome the Council's ambition to *'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'*⁴.
- 1.5 Natural England recognises the challenges facing Medway in developing its local plan, and this consultation response and our ongoing engagement with you are aimed at helping ensure the vision within the Development Options consultation can be realised. The document states that *'By 2035, Medway will be a leading waterfront University city of 330,200 people, noted for its revitalised urban centres, and its stunning natural and historic assets, and countryside'*. To this end we support the document's statement that the scale of planned growth needs *'careful consideration of how Medway's environment and infrastructure can accommodate development that is sustainable'*⁵.

¹ <https://www.gov.uk/government/publications/conservation-21-natural-englands-conservation-strategy-for-the-21st-century>

² Page 15 of the document.

³ Paragraph 7.15 of the document.

⁴ Paragraph 7.12 of the document.

⁵ Paragraph 3.3 of the document.

- 1.6 This approach is also supported in the document's section on Strategic Objectives, and we welcome the statement that the role of the Medway Local Plan is to *'plan positively for the development and infrastructure that the area needs, whilst protecting and enhancing the natural, built and historic environment'*⁶.
- 1.7 We also support the objective that, in order to deliver sustainable development, and respect Medway's natural environment, growth should be directed to *'the most suitable locations that can enhance Medway's economic, social and environmental characteristics'*⁷.
- 1.8 In our response to this consultation we have provided sections covering the Development Options consultation as well as the recently published Interim Sustainability Appraisal (also referred to as "the SA"). As well as statute and national policy, we have considered both documents against the Council's Sustainability Appraisal scoping report ("the SA scoping report"), including the statement at paragraph 1.1 of the SA scoping report that *'Policies in the Local Plan will be subject to a Sustainability Appraisal at each stage of preparation to ensure the most sustainable approach has been identified and pursued'* (our emphasis).
- 1.9 Understandably, the proposed allocation within the Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI) ('Lodge Hill') is a key concern for Natural England and we have provided a specific section in our comments to address our concerns regarding this site. Natural England does not consider that the approach taken to Lodge Hill is sustainable or sound.

⁶ Paragraph 2.39 of the document.

⁷ Paragraph 2.39 of the document, 12th bullet point.

2 Proposed development and site allocation at Lodge Hill

Lodge Hill

- 2.1 We are keen to work with the Council to ensure the rich environment of the district is conserved and enhanced, whilst realising the economic growth and regeneration of the area. Chattenden Woods and Lodge Hill SSSI is one of Medway's finest natural assets. As well as its national importance, we consider the SSSI is a fundamentally important site underpinning the biodiversity value of the district and the wider area of North Kent.

Impacts on the SSSI and wider biodiversity interest

- 2.2 The SSSI is a nationally important site designated for its breeding nightingale population, woodland and unimproved neutral grassland. The purpose of the SSSI notification of Chattenden Woods and Lodge Hill for nightingale is to contribute to the conservation of the British population of the species. Natural England's position is that in-situ preservation of the Chattenden Woods and Lodge Hill SSSI would provide the best outcome for biodiversity.
- 2.3 The proposed development/site allocation at Lodge Hill would result in major direct and indirect impacts to all of the interest features of the SSSI. In Natural England's statement addressing the matters and issues for the Lodge Hill hearing in May 2013, we considered that the proposed development would be likely to result in the loss of 83% of the nightingales on the site and 92% of its special grassland interest⁸.
- 2.4 In addition to the SSSI interest, the site supports significant biodiversity features which would also be directly impacted by the proposed development. The site is rich in protected and notable species including great crested newts and common toads, slow worms, grass snakes and common lizard, as well as a diverse invertebrate assemblage, a rich breeding bird assemblage, and in excess of 50 bat roosts, with at least eight species of bats using the site for feeding or commuting.
- 2.5 There may also be adverse impacts on the areas of ancient woodland outside of the boundary of the proposed development (but also within the SSSI), such as those which could result from increased levels of trampling, pollution, and disturbance, for example.

SSSI and biodiversity duties for local authorities

- 2.6 Whilst we welcome Medway's stated commitment to protecting biodiversity, we would encourage the Council to clearly set out how the approach to Lodge Hill in the development options document is in accordance with the duty placed upon public bodies under section 28G of the Wildlife and Countryside Act 1981 (as amended); this requires a 'section 28G authority':

'in exercising its functions so far as their exercise is likely to affect the flora, fauna or geological or physiographical features by reason of which a site of special scientific interest is of special interest... The duty is to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest.'

⁸ Written Statement from Natural England for the further hearing session, 22 to 23 May 2013, of the Medway Core Strategy Examination, para. 3.

- 2.7 Similarly, it would be helpful if the Council were to clearly set out how the approach in relation to Lodge Hill is in accordance with the biodiversity duty under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006. This places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.
- 2.8 Government planning practice guidance (PPG) on the natural environment ⁹ states that *'A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by government in its Biodiversity 2020 strategy.'*
- 2.9 Biodiversity 2020 states that the challenge set out in biodiversity is to halt the decline in biodiversity *'for the benefit of this and future generations.'* Paragraph 19 further states that *'We need to ensure biodiversity is taken into account by decision-makers within sectors which have the greatest direct influence on our biodiversity, and we need to reduce direct pressures on our biodiversity.'* Specifically with regard to planning and development, Biodiversity 2020 states that government *'will retain the protection and improvement of the natural environment as core objectives of the planning system.'*
- 2.10 In addition, 'Outcome 1' (Habitats and ecosystems on land) has a specific target of maintaining at least 95% of SSSIs in favourable or recovering condition. Natural England's view is that the impact on Chattenden Woods and Lodge Hill SSSI from the proposed development of the site would have a major impact on biodiversity in England. We would therefore expect the Council, in fulfilling its section 28G duty and its biodiversity duty, to seek the protection of the SSSI as a key principle of delivering for biodiversity in its local plan.
- 2.11 We have provided comments on the SA Scoping Report and Interim SA in relation to environmental issues generally which include suggestions for improvement, in Section 4 of this letter. However, on the basis of the SA Scoping Report as it stands, we also consider the protection of Chattenden Woods and Lodge Hill SSSI would be in accordance with the SA scoping report, in particular Sustainability Objective 4 *'Conserve and enhance the existing green network'* and Sustainability Objective 8 *'Making the best use of natural assets'*. Sustainability Objective 4 speaks for itself, and D.17 in particular makes clear that both policy and legislation protects designated sites against inappropriate development, whilst the 'sustainability issue' identified under Objective 4 similarly protects designated sites such as Lodge Hill.
- 2.12 The detail of Sustainability Objective 8 also chimes with Objective 4, and in particular the first of the opportunities identified under that Objective mirrors that under Objective 4, whilst the final Objective 8 'opportunity' is also relevant:

Opportunities:

- *plan for the protection and enhancement of the natural environment...*
- *conserve and protect agricultural land and valuable landscapes and designations in order to support the creation and perseverance of wildlife, habitats and diversity.*

As detailed within Paragraph 113 of the NPPF, the second bullet point should ensure it reflects the hierarchy of international, national and locally important sites.

- 2.13 We have recommended below in our comments on the Sustainability Appraisal that an indicator to ensure no net loss of designated sites from development is included to help the Council in this regard.
- 2.14 We also consider this would be in accordance with the SA scoping report, in particular

⁹ <https://www.gov.uk/guidance/natural-environment>.

Development options scenarios – compliance with NPPF

2.15 Natural England is concerned that Lodge Hill is included within all of the development option scenarios in the consultation document. Such an approach is not compliant with the NPPF, and seems inconsistent with the Council's stated commitment to protecting biodiversity.

2.16 At the heart of the NPPF is the 'golden thread' of a '*presumption in favour of sustainable development*'. Paragraph 14 of the NPPF states that:

*'At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.*

*For **plan-making** this means that:*

- *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 this Framework taken as a whole; or*
 - specific policies in this Framework indicate development should be restricted'*

2.17 The Footnote to this paragraph clarifies that these '*specific policies*' include those relating *inter alia* to sites '*designated as Sites of Special Scientific Interest.*' It is clear, therefore, that the presumption in favour of sustainable development needs to take full account of SSSIs (as well as other environmental designations) in both plan and decision making.

2.18 The NPPF also makes clear that the aim is to seek firstly to avoid adverse impacts on land of higher environmental value and provide a full consideration of alternatives.

2.19 One of the core planning principles stated in NPPF paragraph 17 is that planning should:

'contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;'

2.20 Paragraph 152 of the NPPF further states that for plan-making, significant adverse impacts on any of the dimensions of sustainable development '*should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.*' Paragraph 182 of the NPPF continues this theme regarding alternatives (amongst the other points made there).

2.21 Similarly, Paragraph 110 of the NPPF states that '*In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the **least environmental** or amenity value, where consistent with other policies in this framework*' (emphasis added).

2.22 Paragraph 113, concerned with plan-making, explains a hierarchical approach:

'Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national

and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.'

2.23 As regards paragraph 118 of the NPPF, which makes specific provision for SSSIs in the context of decision making, this states:

'When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;*
- development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;*
- opportunities to incorporate biodiversity in and around developments should be encouraged;*
- planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;'*

2.24 It is clear therefore from paragraph 113 that for policy-making there is a hierarchy as between sites, in which in our view Chattenden Woods and Lodge Hill SSSI sits towards the top, and from paragraph 118 that there is a requirement to follow a decision-making hierarchy when considering impacts on biodiversity. Only if significant harm to the environment cannot be avoided, and alternative approaches have been exhausted, should compensation be considered, as a 'last resort'. This 'avoid, mitigate, compensate' approach is also supported in Paragraph 109 of the NPPF which states that the planning system should contribute to the natural environment by *'...minimising impacts on biodiversity...'*

2.25 In addition, Natural England's view is that the 'last resort' of compensation should only be considered once the planning merits of a development proposal affecting an environmental feature have been fully considered.

2.26 The Development Options report and accompanying documents (e.g. SA, SLAA) do not in our view provide a clear rationale of how these requirements have been met. Whilst the Development Options document notes that the planning status of the land at Lodge Hill is uncertain, the accompanying SA states (in paragraph 4.16) that one of the two main reasons Lodge Hill has been included is due to *'the Council's view that a satisfactory mitigation and compensation package could be implemented.'* (the other is in our view a flawed approach to NPPF policy regarding previously developed land, which we address below).

2.27 This 'leapfrogging' approach (leapfrogging to the assumption that Lodge Hill can be considered as a potential development option because it may be possible to compensate for the environmental impacts) is, in our view, not in accordance with the NPPF. A similar

rationale is implicit in the 2017 version of the SLAA. Although the site is considered unsuitable, this assessment is made *'pending the outcome of the Public Inquiry scheduled for 2018'*¹⁰.

- 2.28 Appendix 2 of the SA also implies that the use of mitigation and compensation means the site can be considered for development. Whilst having a principle that *'Development will be directed away from areas of environmental designations'*, it suggests that Lodge Hill can be considered for development *'if an acceptable solution can be determined for ecological mitigation and compensation...'*
- 2.29 Paragraph 4.27 of the SA also states that the Lodge Hill Public Inquiry *'will determine if the proposed mitigation and compensation strategy is an appropriate planning approach in assessing development on a designated SSSI'*. Natural England's view is that it can already be determined that moving straight to consideration of a mitigation-and-compensation strategy by 'leapfrogging' is not an appropriate planning approach with regard to the NPPF.
- 2.30 Paragraph 4.60 of the SA, which states that the scale of development *'is identified as potentially presenting negative impacts on the environment'*, similarly appears to reflect a 'leapfrogging' approach that does not meet the requirements of the NPPF, as well as the Council's statutory duties regarding Chattenden Woods and Lodge Hill SSSI. This is also the case within paragraph 4.65 of the SA, since the 'balance' suggested fails to differentiate between undesignated and designated sites such as Chattenden Woods and Lodge Hill SSSI and therefore may not be in accordance with the NPPF.
- 2.31 We consider that these NPPF requirements should underpin the further development of Medway's local plan. Our view is that the reliance on the possibility of a mitigation and compensation strategy for Lodge Hill is not sufficient justification for the site being included in all development options as this approach does not comply with the NPPF, in particular the policies in Chapter 11 of the NPPF discussed above and, most specifically, the 'avoid' (or alternatives) part of the 'avoid, mitigate, compensate' hierarchy in the NPPF.
- 2.32 We advise that the assessment of development options will need to clearly identify how the NPPF's principles of avoiding environmental harm and seeking alternatives have been addressed. The inclusion of Lodge Hill in any of the development options should therefore be based on a clear rationale of how the requirements of the NPPF have been met. We recommend that the revised development options are then tested through the Sustainability Appraisal (SA) of the local plan.

Reliance on assumption that Lodge Hill contains Previously Developed Land

- 2.33 The other main reason provided in the SA for the Council considering Lodge Hill potentially suitable for development is that the site contains Previously Developed Land. Natural England is concerned that this approach does not take into account the requirements of the NPPF regarding brownfield land, and the comments made by the Inspector to the Council concerning the withdrawal of the core strategy in 2013.
- 2.34 With regard to brownfield land, the core planning principles of the NPPF (paragraph 17) state that planning should (emphasis added): *'encourage the effective use of land by reusing land that has been previously developed (brownfield land), **provided that it is not of high environmental value,***
- 2.35 This requirement is also reiterated in paragraph 111 of the NPPF: *'Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.'*
- 2.36 As stated in our response to the SA, Natural England supports the reuse of brownfield land

¹⁰ Footnote to Appendix 5 in the 2017 SLAA

where this is not of high environmental value. We are concerned, however, that the SA does not include consideration of the SSSI status of Chattenden Woods and Lodge Hill SSSI as clearly demonstrating the nationally important environmental value of the site. This seems at odds with the recognition in the Landscape & Environment section of the 2017 SLAA that *'the NPPF makes reference to the importance of land of high environmental value.'*¹¹

2.37 The fact that this assessment in the SA is followed by reference (in paragraph 4.16) to a mitigation and compensation package implies, without being stated, that this is the means by which the NPPF exception to brownfield land policy for land of 'high environmental value' is addressed. Our comments above regarding the requirement in the NPPF to seek to avoid environmental impacts and examine all alternatives apply equally to this aspect of the approach being taken towards the Lodge Hill site which we also consider out of step with the NPPF.

2.38 We consider therefore that the SA and Development Options document as currently presented are not consistent with the requirements of the core planning principles of the NPPF.

2.39 Our view is supported by the comments made in the Inspector's letter to Medway Council in June 2013 concerning the withdrawal of the core strategy. In her letter¹², the Inspector noted:

'Various estimates of the amount of the site that can be classified as previously-developed land were put to me in evidence, ranging from 15% (RSPB) to 53% (verbal evidence of CBRE for Land Securities)...

From what I saw [on a site visit], I formed the view that the proportion of the site that could be described as previously developed land is more likely to be towards the lower end of the range set out above. In any event, paragraph 111 of the Framework encourages the reuse of previously developed land, provided that it is not of high environmental value. Whatever the proportion of the site that is previously developed, the fact that it has been designated as a SSSI and is therefore of high environmental value means that its development does not benefit from any particular support from the Framework in this respect.'

2.40 We consider therefore that both the Development Options and the accompanying SA should provide a clear recognition of the high environmental value of Lodge Hill as an SSSI with regard to any extent of Previously Developed Land on the site. In our view this should highlight that the lack of support in the NPPF for development of the site in this respect is a key consideration in assessing the suitability of Lodge Hill for development.

Employment land potential at Lodge Hill

2.41 In addition to the provision of housing, Lodge Hill and the potential allocation sites on the Hoo Peninsula are being considered as potentially offering an opportunity to deliver business park space. The December 2015 Employment Land Needs Analysis (ELNA) highlights that there may be *'the opportunity to deliver an office and research development employment proposition at the site.'* Table 27 in the ELNA suggests that a potential requirement for seven hectares of employment at Lodge Hill area *'Could have more campus office/R&D function.'*

2.42 However, the ELNA applies a considerable degree of caution when considering the employment land potential at Lodge Hill, recognising in particular the 'weak market for business parks in Kent':

¹¹ SLAA report January 2017, p.13

¹² Letter from Laura Graham, Inspector, to Medway Council, dated 21 June 2013

'Clearly, given the early stage the proposals for Lodge Hill are at there needs to be some caution exercised in predicting its future activity, particularly given the need to establish it as a place first, the lack of an existing high quality office market in this area and the still relatively weak market for business parks in Kent.'

- 2.43 Paragraph 9.21 then considers the challenge of taking forward the proposition at Lodge Hill:

'Recent experience at Kings Hill, a major business park located within Tonbridge and Malling, highlights the potential challenges of establishing the Lodge Hill proposition. Despite strong performance and demand for early phases of development more recently demand for space has reduced significantly reduced. As a result the site owners have reviewed the plans for later phases and received planning permission to deliver additional housing rather than the planned future office space.'

- 2.44 Given the relatively small requirement for office space across the plan area and the weak argument for business park space at Lodge Hill, it is unclear why this requirement could not be fully met on a mix of alternative development sites with lesser environmental constraints, thereby helping to achieve sustainable development and adhering to the 'avoid, mitigate, compensate' hierarchy in the NPPF.
- 2.45 We recommend therefore, that to ensure the local plan is sound, a full consideration of alternative sites and ways of realising the economic aspirations for Medway is undertaken and robustly tested through the Sustainability Appraisal (and where appropriate Habitats Regulations Assessment) process as part of the work the Council will be undertaking to progress the Local Plan to the next stage.

Consideration of alternatives to Lodge Hill

- 2.46 We recognise that one of the reasons for the withdrawal of Medway Council's core strategy was the Inspector's conclusion in a letter to the Council in June 2013 ¹³ that she was '*not convinced that there are no reasonable alternatives to the proposed development at Lodge Hill.*' The inclusion of Lodge Hill within all of the development option scenarios means that it is not clear how this comment by the Inspector has been addressed.
- 2.47 We note that the Issues and Options consultation document (paragraph 27.7) considered that the uncertainty surrounding the Lodge Hill site necessitated the consideration of alternatives, stating:
- '...given the uncertainty on the site, in advance of the outcome of the Public Inquiry, the new local plan must consider options for development, should Lodge Hill not form part of Medway's growth strategy. This involves not only identifying sufficient alternative land for the homes and employment proposed at Lodge Hill, but also a fundamental review of the development strategy being promoted for Medway.'*
- 2.48 However, it is not clear from the Development Options document whether a fundamental review has been undertaken, but as the reference is to uncertainty, which is plainly the current position, with the outcome of the public inquiry still unknown, we consider that this review should be taking place at this stage of the plan process.

¹³ Letter from Laura Graham, Inspector, to Medway Council, dated 21 June 2013

- 2.49 Paragraph 4.29 of the SA states that the Council will need to consider its response to Lodge Hill if the proposed development is not supported by the Secretary of State. Natural England is concerned that waiting until after the outcome of the public inquiry, and any subsequent challenge, may risk the Council being able to secure a sound plan. We advise that the consideration of alternatives set out in the SA to development at Lodge Hill should be explored fully at this stage of the plan-making process so that a clearer assessment of the deliverability of the plan is made before the commencement of the public inquiry.
- 2.50 The SA suggests one of the alternative approaches could be to seek to increase development allocations in other areas of Medway. The first bullet point of paragraph 4.29 considers that such an approach '*could place unacceptable pressures on the environment...*'. Natural England recognises and welcomes the Council's stated commitment in the Development Options document to protect biodiversity, valued landscapes and geological conservation interests. We also recognise the Council's concerns, in this document, the SA, and the SLAA, regarding the potential impacts from development options on environmental features including best and most versatile agricultural land and areas of local landscape value (as well as the nationally important Kent Downs Area of Outstanding Natural Beauty [AONB]).
- 2.51 We consider, however, that the potential local environmental impacts of alternative sites to Lodge Hill, including their potential impact on undesignated land such as best and most versatile agricultural land, need to be weighed up against the significant harm from the proposed development of a nationally important SSSI.
- 2.52 We note that various development options which were assessed in the 2017 SLAA as unsuitable (and also considered in the November 2015 SLAA as '*unsuitable for development unless identified constraints can be addressed*') are nevertheless shown on the maps in the Appendices of the Development Options document. This is noted in paragraph 4.19 of the SA. We would wish to explore further with the Council whether the environmental impacts of alternative sites can be addressed, when seen in the context of avoiding the significant direct harm to the Chattenden Woods and Lodge Hill SSSI. We consider support for this approach is provided in the SA (paragraph 4.19), which states that with regard to the review of sites not considered suitable in the SLAA '*Other constraints may need to be assessed in the wider context of establishing a balance of planning considerations.*'
- 2.53 In this respect, we would consider that if alternative sites can be taken forward as development options, because their environmental impacts can be addressed and/or are of a lesser magnitude, these are likely to represent a more sustainable alternative to Lodge Hill. In other words, such sites might only be considered as suitable in environmental terms because of the significant environmental harm they avoid to the Chattenden Woods and Lodge Hill SSSI. We suggest this approach should be tested as part of the Sustainability Appraisal of the emerging local plan.

Duty to Cooperate

- 2.54 Natural England notes that in the SA (paragraph 4.29) a further alternative option to Lodge Hill is through the Duty to Cooperate, through requests being made to neighbouring areas to meet unmet housing need outside of the borough boundary.
- 2.55 This may be particularly important, not just given the constraints upon Medway, but also because the November 2015 North Kent Strategic Housing and Economic Needs Assessment identifies that the Medway Council Housing Market Area (HMA) encompasses a wider area beyond the authority area, to include Gravesham, Swale, Maidstone, and Tonbridge & Malling.
- 2.56 We are committed to working closely with Medway Council as part of the Duty to Cooperate and note that the Duty to Cooperate Scoping Report will be consulted upon in due course. It would be helpful if further information could be made available on the outcome of the

stakeholder workshop with the prescribed Duty to Cooperate bodies in February 2016 (a summary of which is provided in the Issues & Options Consultation Responses report), and the conclusions of any other discussions with neighbouring authorities on the potential for allocating some of Medway's housing need outside of the district. This would also help Natural England understand more clearly how Medway's housing requirement sits within the wider north Kent area.

Best and most versatile agricultural land

2.57 Natural England recognises that significant areas of land on the Hoo Peninsula, and bordering the urban areas of Strood and Rainham are of the highest grades of best and most versatile agricultural land (as noted in paragraph 3.12 of the Development Options Consultation document). We would be happy to work with the Council to offer advice on the wider environmental implications for possible allocation sites.

2.58 The NPPF does not preclude the allocation of best and most versatile agricultural land within a Local Plan, with paragraph 112 stating:

'Local planning authorities should 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, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

2.59 This contrasts with the presumption against development on a designated site unless there are exceptional circumstances, as detailed in Paragraph 118 of the NPPF:

'...proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest'

2.60 The Development Options Consultation and accompanying documents do not appear to reflect this difference in approach to nationally designated sites and agricultural soil protection detailed within the NPPF. In Table 2 of the Sustainability Appraisal Scoping Report, the decision-aiding question for Objective 4: Conserve and enhance the existing green network in relation to designated sites is *'Will it protect and enhance the environmental designations?'*. This would appear to exclude the further consideration of an allocation at Lodge Hill within the Local Plan.

2.61 For Objective 8: Making the best use of natural assets, a similar decision-aiding question is provided, namely *'Does it protect or improve on the quality of agricultural land?'*. This approach appears to give agricultural land the same level of consideration in the Local Plan decision-making process as nationally designated sites.

2.62 Natural England therefore recommends that as the development options are refined, greater clarity is provided on how potential development allocation sites will be considered in accordance with the differing requirements of the NPPF in relation to designated sites and agricultural land to ensure that the Plan is sound.

Summary and recommendations in relation to the proposed allocation at Lodge Hill

2.63 Overall, our advice is that in order to meet the tests of sustainable development, alternatives to the proposed development of this site need to be fully considered and tested in the plan process. At present, we do not consider this approach has been properly developed. In keeping with our shared objective of ensuring Medway secures a sound local plan, we

remain committed to working with the Council to ensure that sustainable alternatives can be identified to avoid the loss of a nationally important environmental asset. To this end, we would be pleased to work with the Council following this consultation to advise on the likely environmental implications of potential site allocations in relation to nature conservation, landscape and best and most versatile agricultural land.

2.64 We are concerned that the lack of alternatives to Lodge Hill within the strategic development options gives rise to considerable uncertainty and risk of the Plan being found unsound. We would encourage the Council to consider and set out alternative options to the development of the SSSI that recognise the approach that needs to be taken under the NPPF to address significant impacts on the environment. We welcome the initial consideration in the SA of alternative options to Lodge Hill and we are committed to working with the Council to examine all alternative options that will result in the protection of the SSSI.

2.65 We consider that addressing the question of alternatives to Lodge Hill at this stage of the plan process is both a requirement of plan-making, and a core principle of sustainable development. We also consider that identifying alternatives is the appropriate way to reduce the considerable risk to the plan having undue reliance on this site, and to enable the Council to realise its stated commitment of protecting biodiversity.

2.66 In summary, we have advised:

- that the Council should clearly set out how the approach for Lodge Hill is in accordance with the biodiversity duty for local authorities (under the NERC Act, 2006), and Medway Council's responsibilities as a 'section 28G authority' under the Wildlife and Countryside Act 1981 (as amended).
- that a robust assessment of development options will need to clearly identify alternatives to Lodge Hill.
- that the consideration of Lodge Hill should fully recognise the requirement in the NPPF to reflect a hierarchy of environmental designations in plan-making and to follow a decision-making hierarchy when considering impacts on biodiversity - only if significant harm to the environment cannot be avoided, and alternative approaches have been exhausted, should compensation be considered, as a 'last resort'.
- that both the development options and the accompanying SA should provide a clear recognition of the high environmental value of Lodge Hill as an SSSI and that this removes any policy support for development of any Previously Development Land on the site.
- that the potential local environmental impacts of alternative sites to Lodge Hill need to be weighed up against the significant harm from the proposed development on a nationally important SSSI.
- that the consideration of alternatives set out in the SA to development at Lodge Hill should be explored fully at this stage of the plan-making process so that a clearer assessment of the deliverability of the plan is made before the outcome of the public inquiry.
- that if alternative sites can be taken forward as development options, because their environmental impacts can be addressed and/or are of a lesser magnitude, these are likely to represent a more sustainable alternative to Lodge Hill.

3 Development Options Consultation Document

- 3.1 Natural England has a shared objective with Medway of the Council securing a sound plan, that enables growth in Medway in accordance with the principles of sustainable development. We are committed to working with the Council to achieve this objective.
- 3.2 Our focus is on ensuring that the natural environment is fully considered as part of the plan-making process, and that every opportunity is sought to protect and enhance Medway's environmental assets. We welcome therefore the Council's vision that: *'Medway will be... noted for its... stunning natural and historic assets, and countryside... defined by development that respects the character, functions and qualities of the natural and historic environments... to ensure that important wildlife and heritage assets are protected and opportunities are realised to enhance their condition and connectivity.'*
- 3.3 We also welcome this vision for the environment being further underlined by the statement that *'The environment is central to the ambitions for Medway's sustainable growth... The Local Plan will set out the Council's commitment to protecting biodiversity, valued landscapes and geological conservation interests'*¹⁴.
- 3.4 Natural England is supportive of the text within the *'Developing a vision for 2035'* and we are keen to work with the Council to ensure that Medway's rich and varied natural assets are conserved and enhanced through the local plan delivery.
- 3.5 Similarly, Natural England welcomes, and is generally supportive of the Strategic Objectives detailed in Section 2.39. Given the diverse environmental assets in Medway, we would recommend that the first bullet point under the *'Ambitious in attracting investment and successful in place-making'* could be made to reflect better the aspirations for Medway elsewhere in the document by a minor amendment along the following lines:
- ...meeting the needs of Medway's communities, ~~respecting~~ *safeguarding* the natural and historic environment...
- 3.6 Natural England supports the reuse of brownfield land where this is not of high environmental value (as detailed within Paragraph 17 of the National Planning Policy Framework); it would therefore seem appropriate to include this caveat within the second bullet point under the *'Ambitious in attracting investment and successful in place-making'* strategic objective to ensure it fully reflects the approach advocated by national policy.
- 3.7 Natural England supports the *'Policy Approach: Securing strong green infrastructure'* and we note that *'A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland'*. The inclusion of the development site at Lodge Hill within each of the Development Options appears contrary to this Policy Approach and, as detailed in the second section of our response to this consultation, does not reflect the 'avoid, mitigate, compensate' hierarchy within the NPPF.
- 3.8 Natural England notes the Council's desire to safeguard Rochester Airport to provide *'an enhanced aviation facility'*. Given its location, any proposed increase in flights would need to fully consider the implications for the Kent Downs AONB.
- 3.9 In terms of the development scenarios presented within the Development Options Consultation Report, notwithstanding the advice above in relation to the inclusion of the site at Lodge Hill within them all, Natural England considers that the option (or elements of more than one option) which avoids impacts to the most important environmental assets should be pursued to the preferred options stage. We consider that the best way to test this is through a robust Sustainability Appraisal process which should thoroughly compare the environmental implications of the site allocations against each other.

¹⁴ Paragraph 7.15 of the document

- 3.10 Natural England would be pleased to work with the Council as you move towards the preferred options stage of the local plan to provide advice on the likely environmental impacts of individual allocation sites and the nature and scale of any mitigation measures that may be required to help realise our shared aspiration of a sound local plan.
- 3.11 Natural England considers that it would be helpful if the Council were to undertake a reasonable alternatives and preferred options consultation, once further details of the development options presented in this consultation have been finalised, before consulting on the draft Local Plan.
- 3.12 In summary, we have advised:
- that the development option, or options, which avoids impacts to the most important environmental assets within Medway should be pursued to preferred options stage. Natural England would be pleased to work with the Council to offer further advice on a site-by-site basis.
 - that the Council undertakes a reasonable alternatives and preferred options consultation following this consultation so that a robust assessment of allocation sites and their potential environmental impacts can be undertaken.

4 Sustainability Appraisal Scoping Report and interim Sustainability Appraisal

- 4.1 Natural England welcomes the opportunity to provide comments on the Sustainability Appraisal Scoping Report and the Interim Sustainability Appraisal Report (both dated March 2017). It is normal practice for the scoping report to be consulted in advance of the Sustainability Appraisal to ensure that any comments or amendments recommended by consultees can be taken into account during the appraisal process. Natural England therefore recommends that the interim Sustainability Appraisal report is revised following the amendments that may be necessary as a result of this current consultation.
- 4.2 The Sustainability Appraisal process is key to ensuring that a robust consideration of proposals and their alternatives is undertaken to confirm that the most sustainable development allocations are selected, considering all elements of sustainable development on an equal basis.
- 4.3 The SA Scoping Report identifies the area of land covered by key environmental designations within Medway. It would, however, be helpful if the individual sites were detailed by name as part of the baseline information to ensure that the appraisal considers all potential direct and indirect impacts. It would also appear appropriate for priority habitats to be mapped as part of the baseline data following the 2012 Kent Habitat Survey which also covers Medway. They should also be detailed fully within the subsequent iterations of the Local Plan documentation in accordance with Paragraph 117 of the NPPF which requires that:

‘To minimise impact on biodiversity and geodiversity, planning policies should:

- Plan for biodiversity at a landscape-scale across local authority boundaries;*
- Identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them...’*

- 4.4 In addition to areas of high wildlife or landscape value, Medway supports key populations of protected, rare or notable species. Whilst a comprehensive data set for Medway is not available, it would appear appropriate for species data from the Kent and Medway Biological Records Centre¹⁵ to form part of the baseline data to aid the decision-making process.
- 4.5 The ‘Specific issues and opportunities’ section of the Scoping Report highlights, in paragraph D.17, that *‘Planning policy and legislation provide strong protection against inappropriate development of the most important designated sites...’*. The inclusion of Lodge Hill within all of the development options, and the identification of some of the employment sites on the Isle of Grain appears to be in conflict with this approach highlighted in the Scoping Report and also *‘Sustainability Objective 4: Conserve and enhance the existing green network’*.
- 4.6 *‘Sustainability objective 5: To adapt and mitigate the impacts of climate change’* is also pertinent to designated nature conservation sites and wildlife since air quality can result in changes to habitats, and providing habitat and corridors to help species adapt to the effects of climate change is key to sustainable development. It would therefore seem appropriate to make reference to biodiversity within Sustainability Objective 5.
- 4.7 In terms of the natural environment, Natural England considers that Sustainability Objective 4 within the Sustainability Appraisal report, *‘Conserve and enhance the existing green network’* could be more clearly worded to reflect the rich environmental assets (International, European, national and county sites of wildlife importance and the national and local areas of landscape importance) in addition to the wider green spaces which may have significant

¹⁵ www.kmbrc.org.uk

cultural and social importance but have a lower wildlife value. A possible alternative wording for Objective 4 which reflects the District's rich environmental heritage is provided below:

'Conserve and enhance the District's designated sites, important landscapes, priority habitats, priority and protected species and areas of green infrastructure.'

The above wording would appear to reflect better the *'Decision Aiding Questions'* accompanying Objective 4 in Table 2 of the Scoping Report.

- 4.8 Natural England supports the *'Decision Aiding Questions'* for Objective 4 *'Conserve and enhance the existing green network'* of Table 2 within the Interim Sustainability Appraisal, namely:

- Will it protect, conserve or enhance the green infrastructure network?
- Will it protect and enhance the environmental designations?
- Will it contribute positively to the green infrastructure network, the Authority's established high quality landscapes and biodiverse landscapes?
- Does it result in the creation of more open space including allotments, parks, gardens etc.?
- Does it create opportunities to link to and create a green infrastructure network?
- Will it improve access to green spaces?

However, the Sustainability Appraisal assessment tables for Development Options and Policy Approaches contained within Annex 2 of the Appraisal do not appear to reflect the decision-aiding questions detailed within Table 2 and reproduced above. It would be helpful if a table detailing how the various Development Options and Policy Approaches proposed score against each of the *'Decision Aiding Questions'* to allow an understanding of how the appraisal scores have been reached as the issues identified within Appendix 2 for each Option or Policy do not reflect these questions.

- 4.9 All of the proposed development options include the site at Lodge Hill; as highlighted above the lack of a development option without the proposed development site at Lodge Hill would appear to be contrary to the NPPF. It also appears contrary to Sustainability Objective 4 *'Conserve and enhance the existing green network'* and Sustainability Objective 8 *'Making the best use of natural assets'* along with the supporting text for these Objectives. Natural England therefore recommends that clarity is provided on how the inclusion of Lodge Hill in all of the development scenarios accords with the requirements of the NPPF and the Sustainability Appraisal before the next formal stage of the local plan.
- 4.10 We note in the Spatial Options section of Appendix 2 within the appraisal comments column that Lodge Hill is only specifically mentioned within Options 2 and 3 despite it appearing in all four options. In addition, it is stated for Options 2 and 3 that *'Development will be directed away from areas of environmental designations (if an acceptable solution can be determined for ecological mitigation and compensation at Lodge Hill)'*. This approach appears contrary to the NPPF and guidance provided by the Inspector on the withdrawn core strategy. In addition, it does not appear to consider all allocation sites equally since some proposed allocations within the Strategic Land Availability Assessment have been discounted on environmental grounds but these impacts may be lesser and more straightforward to mitigate than those at Lodge Hill, thereby providing a viable alternative to the proposed development at Lodge Hill.
- 4.11 The proposed indicators against which Objective 4 will be assessed appear to focus primarily on greenspace provision from development rather than ensuring the rich natural environmental assets of Medway, and wildlife they support, are conserved and enhanced. In addition to the proposed indicators contained within Table 2, Natural England suggests the

Council should consider including the following as indicators:

- No net loss in areas of designated wildlife sites.
- Area of net gain of priority (or Biodiversity Action Plan [BAP]) habitats delivered by development.
- Area of multifunctional greenspace delivered through developments contributing to the district-wide green infrastructure strategy.
- Number of landscape enhancement schemes secured.

4.12 Natural England advises that it may be appropriate to separate landscape and nature conservation during the Sustainability Appraisal process. Whilst the two are linked, to aid clarity in the decision-making process, we consider dividing them into separate sections would make the process more sound.

4.13 Sections 2.9 and 2.10 of the Interim Sustainability Report confirm that a Habitats Regulations Assessment of the Development Options Report has been undertaken which highlights the potential for impacts to occur from noise and light pollution, along with water and air resources. We received this Assessment on the 13 April 2017 and Natural England will of course be pleased to provide advice on this document in the near future.

4.14 In summary, we have advised:

- that further work is required to identify and map the ecological networks across Medway, being mindful of the hierarchy of designations.
- that clarity is provided on how the inclusion of Lodge Hill in all of the development scenarios accords with the requirements of the NPPF and the Sustainability Appraisal before the next formal stage of the local plan.
- the Sustainability Objectives are modified to fully reflect the rich environmental assets within Medway to allow a robust Sustainability Appraisal of the development options.
- that the Sustainability Appraisal is revised to provide detail on how each of the proposed allocation sites scores against the '*Decision Aiding Questions*' to allow a clear appraisal of the environmental implications for each of the potential allocation sites.
- that additional indicators against which the development options will be assessed should be included to ensure that important wildlife, landscape and environmental assets within Medway are conserved and enhanced through the lifetime of the Local Plan.

[REDACTED]

From: Neil Shorthouse [REDACTED]
Sent: 25 February 2017 11:53
To: futuremedway
Subject: RE: Proposed Development | Cuxton

Follow Up Flag: Follow up
Flag Status: Completed

Having recently, read about potential development alongside Sundridge Hill and Station Road Cuxton, this would not only add to traffic considering the developments in Halling and Wouldham and inadequate road infrastructure in place would create further traffic. Also the land opposite Station Road, constantly and always floods during heavy rain, and would therefore be considerable unsuitable for building. What happened to the development by the new Rochester Train Station. Are we not supposed to be the Garden of England vs the overdeveloped garden of England.

Best wishes,

Neil Shorthouse
[REDACTED]