

Medway Council
Planning Services
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Date: 18 April 2017
Our ref: 06715/NG/BE/13437964v1
Your ref:

Dear Sir/Madam

Representations to Medway Local Plan: Regulation 18, Development Options Consultation

This letter has been prepared by Lichfields on behalf of our client, the Peel Group, including 'Peel Holdings (Land and Property) Limited ("Peel").

Peel is a private real estate, media, transport and infrastructure investment company who is a major landowner in Medway. Lichfields (formerly trading as NLP) has previously submitted representations on behalf of Peel in relation to their landholdings at Chatham Docks (SLAA Ref: 0824), Wooley's Orchard (SLAA Ref. 0749) and Land East of Seymour Road (SLAA Ref. 1047) – appended to this letter. Lichfields has attended on behalf of Peel Local Plan workshops relating to East of Rainham.

This letter comprises formal representations to the Development Options Consultation in respect of the emerging Medway Local Plan.

Peel welcomes the opportunity to be involved in the creation of policies that will form part of the emerging Local Plan. These representations provide comment in relation to the various options proposed within the consultation document relating to sustainable development options and housing strategy.

Section 3: Delivering Sustainable Development - Options

Scenario 1 - Maximising the Potential of Urban Regeneration

This scenario seeks to continue the regeneration of waterfront sites, including building at higher densities in appropriate locations. This approach would deliver much of the housing in the form of apartments, but will not on its own meet the needs of all the different sectors of the population. The Council also recognises that high-density riverside development will not support the housing requirements of everyone. In addition to this approach the Local Plan will need to support the incremental expansion of suburban and rural areas as suitable locations for new development, in order to achieve a balanced development strategy. In order to meet the OAN in the short, medium and long term, a combination of housing approaches is required.

Notwithstanding the need for alternative approaches, Peel supports this urban regeneration scenario as it will form part of a broad range of sites in terms of the location and types of dwellings provided. This will ensure the needs of the different sectors of the population are met. The Housing White Paper – Fixing our Broken Housing Market (2017), suggests that national policy will be amended to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes. In addition, the Housing White Paper places a focus on increasing density in urban locations which are well served by public transport. This scenario would therefore support the aspirations of the Housing White Paper.

Peel considers its landholdings at Chatham Docks are well placed to accommodate growth in line with Scenario 1. This scenario will allow for high density flats and important family housing to be provided. High density development provides an opportunity to rejuvenate underused brownfield sites to create sustainable communities and make a meaningful contribution towards the identified housing need. The Medway Strategic Housing Market Assessment (SHMA) (November 2015) identifies that the number of households in the 15-24 and 25-34 age groups will increase by 5% and 13% respectively from 2013-2033. High density town centre and riverside developments predominantly comprise smaller housing units, typically 1 to 2 beds, and as such will help to meet this identified future need. An example of the positive contribution this development option can make is the Chatham Waters Development which has outline approval for 950 residential units on a 14.6ha site (Ref. MC/11/2756), which by itself will provide 74.2% of Medway Council's annual OAN.

The acknowledged need to supplement urban regeneration with development elsewhere in Medway is supported by Peel. Peel also supports the incremental expansion of suburban and rural areas (see below) as this has the potential to utilise sustainable and well connected infill plots on the edge of existing settlements to meet the housing requirements for families. This type of land is often available for development in a timely manner and as such can help to contribute towards the Council's immediate housing need. Peel's landholdings in Rainham (Wooley's Orchard and Land East of Seymour Road) provide potential to assist in the incremental expansion of Rainham and contribute meaningfully towards meeting Medway's housing need.

Scenario 2 – Suburban Expansion

In this scenario, consideration would be given to the development of sustainable urban extensions around Rainham, Capstone and Strood, and the Council acknowledges that development could be located on greenfield sites *“that may be quicker to develop than large brownfield sites”*.

Peel considers that the first priority should be development on non-green belt land, in particular brownfield land, under-utilised land and appropriate suburban incremental development. Brownfield sites offer sustainable regeneration opportunities and the National Planning Policy Framework (NPPF, 2012) encourages the effective use of land by reusing land that has been previously developed (para. 17). Chatham Docks is a brownfield site which, as outlined previously, offers substantial regeneration opportunities to accommodate future development needs in Medway.

In line with national policy, Peel believes priority should be given to development on existing brownfield sites; and then appropriate edge of suburban / rural locations. This is also supported by the Housing White Paper which places a continued endorsement on Green Belt policies. Peel's landholdings at Wooley's Orchard and Land East of Seymour Road are capable of being developed to meet housing need in the short term and can address the current shortfall in the five year land supply. It is important that deliverable sites such as these are included in the Local Plan strategy, alongside sustainable urban extensions, which will take much longer to come to fruition.

Scenario 3: Hoo Peninsula

This scenario commits to the continuation of urban regeneration of brownfield sites. A key strand of this scenario is also the expansion of Hoo St Werburgh into a small rural town. The focus is on developing a sustainable rural town, and concentrating development around larger villages to avoid sprawl into the wider countryside.

As discussed above, Peel supports the principle of the urban regeneration approach, including at its land holdings at Chatham Docks. Peel considers that the priority should be to focus development on existing brownfield sites along with incremental development of appropriate suburban locations.

Scenario 4: Urban Regeneration and a Rural Town

This scenario brings together components of the previous three scenarios. It includes elements of developing at higher densities in waterfront and urban centre sites in Chatham and Strood, and seeking opportunities to consolidate development sites in these urban areas.

As outlined above, high-density riverside development and incremental suburban development provides a significant opportunity to achieve a balanced development strategy and Peel considers that this should be a priority.

Peel does not accept that land at Chatham Docks should not be identified for housing development due to the complexity of the site. The Council has not adopted a consistent or sound approach to all potential major development sites. No reasoning is provided by the Council as to why the potential complexity of the site should prevent development here and no commentary is provided on other potential development sites. Peel continues to consider the site well placed to accommodate residential development.

As outlined above, high density development in this location would provide an opportunity to rejuvenate an underused brownfield site, to create a sustainable community and make a meaningful contribution towards the identified housing need as in accordance with the principles of the NPPF. In addition, the updated Strategic Land Availability Assessment (January 2017), identifies Chatham Docks as both available and suitable for up to 2,577 dwellings. As discussed above, a previous example of a positive redevelopment of a brownfield site is the Chatham Waters Development which has outline approval for 950 residential units on 14.6ha (Ref. MC/11/2756), which by itself will provide 74.2% of Medway Council's annual OAN.

Summary

In summary, in line with national policy, Peels considers that priority should be given to the development of existing brownfield sites and also appropriate incremental suburban/rural development. These priorities will ensure a broad range of sites in terms of the location and types of dwelling are provided, ensuring the needs of the different sectors of the population are met. High-density riverside development, on brownfield sites and incremental suburban development provides a significant opportunity to achieve a balanced development strategy and Peel therefore considers that this should be a priority.

Section 4- Housing

Policy Approach: Affordable Housing and Starter Homes

The appropriate requirement for affordable housing needs to be kept under review and is inextricably linked to the OAN, the range of housing sites allocated, the appropriate density of development on allocated sites and individual site circumstances. At this stage, the indicated 25% appears to be a realistic maximum target.

Section 8 – Built Environment

Policy Approach: Housing Density

Peel supports the Council's approach to seek the efficient use of land through higher density development in appropriate locations. Notwithstanding this, Peel considers that Riverside areas in particular provide opportunities to achieve higher densities and critical mass, without adverse impacts from taller buildings. This should be recognised in the wording of emerging local plan policy.

The advantages of high density riverside development in meeting new lifestyle trends are clear and this type of development will have an important role in meeting the OAN.

Section 11 – Sustainable Transport

Policy Approach: Transport and the River Medway

The policy approach confirms that the Council will consider opportunities to achieve greater urban regeneration gains, recognising that this may impact on port and wharves facilities. In reaching a decision, the Council will give careful consideration to the need to safeguard the capacity of port and wharves in Medway.

Chatham Dock is currently designated as employment land, but the Strategic Housing and Economic Needs Assessment (SHENA) indicates there is a surplus of this type of land in the sub-region. The Port of Sheerness, located in Swale, is the key deep water commercial port in the sub-region. Peel Ports (who owns the Port of Sheerness) is promoting and implementing a comprehensive masterplan to expand this port function, and this will adequately serve businesses within the Medway area. The emerging plan should therefore not seek to safeguard the future of Chatham Dock as employment land or an operational commercial port facility.

Summary

We consider that the suggestions set out within these representations are appropriate and will assist in ensuring sustainable, viable and deliverable development within Medway. We trust these will be taken into consideration.

Should you have any queries or require any further information, please contact myself or my colleague, Peter Wilks.

Yours faithfully



Beth Evans
Planner

Copy

Philip Rothwell
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Warren Marshall
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Peel Holdings (Land and Property) Limited
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Planning Policy Regeneration
Medway Council
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Email: futuremedway@medway.gov.uk

Date: 30 May 2017

Our ref: 15513/SSL/MCM/13427257v1

Your ref:

Dear Sir/Madam

Medway Local Plan: Development Options Regulation 18 Consultation

Representations on behalf of Church Commissioners for England: Land at Hoo Peninsula.

This letter has been prepared by Lichfields on behalf of the Church Commissioners for England (CCE) and comprises formal representations to the emerging Medway Local Plan: Development Options.

The Church Commissioners for England (CCE) manage the historic property assets of the Church of England. Their Strategic Land Portfolio currently comprises circa 6,000 acres, with sites located nationwide. CCE seek to promote their landholding, where suitable, for development through the Local Plan process and work closely with LPA's to demonstrate site deliverability.

CCE have significant landholdings on the Hoo Peninsula including land to the east of Hoo St Werburgh and at Stoke, Lower Stoke and Allhallows. They are, therefore, in a position to make land available to assist the Council in meeting the identified housing requirements for the area and in meeting the Council's vision and strategy.

CCE welcomes the opportunity to be involved in the creation of policies that will form part of the emerging Local Plan. These representations provide comment in relation to a number of the questions posed within the consultation document but, in particular, the growth options that the Council is considering. These representations are predominantly focused on the policies relating to housing, employment and sustainable development.

It should be noted that CCE is part of the Hoo Consortium. The Consortium has made representations via a Development Framework Document (May 2017) which sets out the Consortium's shared vision for the expansion of Hoo St Werburgh and Chattenden into a sustainable rural town.

General – Approach to the Hoo Peninsula

CCE recognise that, in meeting the identified housing requirement, the Council should, in the first instance, look to bring forward urban sites and previously developed land. However, it is also noted that such sites are often costly to bring forward and can take time to become available to deliver the required housing. These

considerations, coupled with the Borough's significant housing requirement will require the identification and release of less constrained greenfield sites.

To achieve its vision, CCE consider that the Local Plan needs to be ambitious, yet fully deliverable. It needs to ensure that the housing and employment needs of the Borough can be delivered with clear guidance as to the most appropriate and sustainable sites to accommodate the required housing and employment. In doing so, the Council will need to take a pragmatic approach to a range of development options.

In this regard, CCE fully support the proposals in the Development Options for significant growth at Hoo St Werburgh to support a service centre for the Peninsula. The support for these proposals is clearly set out in the submission by Barton Willmore prepared for a consortium of landowners and developers, including CCE. On that basis, we do not provide any further commentary on Hoo St Werburgh within this letter.

However, as mentioned above, CCE also own other land on the Peninsula, which should be made available for housing in the medium to longer term, once Hoo St Werburgh has become established as an employment and service destination.

In addition to the housing requirements, CCE also own land adjacent to the Kingsnorth employment area and consider that this land could be made available to provide further employment opportunities, as and when required.

This representation therefore identifies land that could be made available on the Hoo Peninsula, in addition to Hoo St Werburgh, to assist in meeting the housing and employment requirements of the Borough. In this context, CCE have commissioned initial surveys to identify that development of the sites in question would not be constrained. They have also undertaken initial feasibility analysis to establish the likely capacity of such sites, if they were allocated in the Plan.

We set out these more detailed considerations below and CCE would welcome the opportunity to work with the Council and local communities to take these proposals forward.

Local Plan: Development Options

We note and agree with the Council that whilst regeneration of brownfield sites is at the core of Medway's growth plans and the Council's vision, brownfield sites alone cannot deliver the scale and range of development needed. In this regard, the Council recognise that, realistically, there is a need to find greenfield sites to accommodate the levels of growth envisaged. The overall, sustainable and deliverable solution would, therefore, be to retain a core component of urban regeneration but to promote this as part of a wider, balanced development strategy that also involves the release of greenfield sites at strategic locations.

When releasing greenfield sites for development, the NPPF states at paragraph 84 that "local planning authorities should take account of the need to promote sustainable patterns of development". Release of greenfield land for development should therefore be the most sustainable and least constrained land that is well related to services and infrastructure.

The consultation document provides four development options for consideration. The document acknowledges that Medway needs to plan adequately for 29,463 homes, 48,843sqm of B1 office space, 155,748sqm of industrial land and 164,263sqm of B8 warehousing land. This is in addition to significant retail (comparison and convenience) floorspace and community infrastructure such as schools, health and community centres.

This is a considerable amount of development that needs to be accommodated within Medway and, therefore, we would agree that a range of development and growth scenarios will need to be considered.

The Council is currently seeking views on the following four development scenarios:

- 1 Maximising the potential of urban regeneration;
- 2 Suburban expansion;
- 3 A rural focus; and
- 4 Urban regeneration and rural town.

We comment on these below.

Scenario 1: ‘maximising the potential of urban regeneration’

In respect of Scenario 1 ‘maximising the potential of urban regeneration’, CCE supports this in principle, but has reservations about the ability for this scenario to deliver the housing requirements. As set out at paragraph 3.25, it is recognised that this approach alone will not be able to deliver the range or number of homes required to meet the predicted growth and, as a consequence, additional land is needed elsewhere within the Borough.

CCE supports the Council’s vision for a modern employment park development around an extended Kingsnorth to help meet the predicted need for both commercial and industrial floorspace. This would provide for an accessible and quality site for businesses that may be displaced from development elsewhere within the District.

Scenario 2: ‘Suburban expansion’

CCE we would query the capacity to meet the housing requirement through the release of suburban urban extensions around Rainham, Capstone and Strood to complement the urban regeneration taking place in central Medway as some of these areas are more constrained by landscape designations and flooding. In this regard, CCE would agree that “given the proximity of Medway’s borough boundaries and important landscape features, there is limited capacity for suburban expansion” and, as such, consider that a proportion of development should also be accommodated in the rural areas of the Hoo Peninsula which are less constrained and could be very sustainable, if planned well and with foresight.

Scenario 3: ‘Hoo Peninsula Focus’

CCE agrees that the Hoo Peninsula is a suitable location for growth, given that it is relatively unconstrained, with particular scope to deliver the expansion of Hoo St Werburgh as a sustainable service centre to meet the wider needs of the area.

CCE therefore supports the key strand of this scenario, which is the expansion of the large village of Hoo St Werburgh into a small rural town. This could involve development in neighbourhoods around the wider area, including Chattenden, Deangate and Lodge Hill. As a large village in a rural area, both Hoo St Werburgh and the wider Hoo Peninsula have limited services in comparison with the Medway towns. The focus would be on developing a sustainable rural town, and concentrating development around larger villages to avoid sprawl into the wider countryside. Submissions on behalf of a consortium of landowners and developers in the area confirm that this is achievable and deliverable.

As stated above, CCE believe that the main focus in the short to medium term should be accommodating growth around Hoo St Werburgh, so that this becomes an established service centre. In tandem with this, CCE consider that further growth around the smaller settlements on the Peninsula should be undertaken.

Scenario 4: Urban Regeneration and Rural Town

This brings together components of the urban regeneration, suburban expansion and rural development scenarios set out above. Aspects of the rural focus scenario are supported, for their potential to deliver planned development that could enhance the provision of services and jobs on the Hoo Peninsula, and strengthen the role of Hoo St Werburgh.

As stated above, CCE have reservations about too much reliance on urban sites to deliver the housing requirement because, as stated in the Development Options, there should be “...caution in identifying land at Medway City Estate and Chatham Docks for comprehensive renewal that could deliver significant residential areas in the plan period, due to the complexity of these sites”.

Development Capacity: Smaller Settlement Sites on Hoo Peninsula

In the context of the Local Plan Development Options Scenarios, CCE has appointed a consultant team to undertake studies of the Hoo landholdings to ensure that the areas identified by the Council are sustainable options with no overriding physical constraints to delivery in the medium to longer term of the Plan period and beyond.

The main considerations have been transport, ecology, heritage and landscape in defining potential development areas and capacity, as set out below.

Transport Overview

Road Network

CCE acknowledge that a fundamental consideration in Scenario 3 is the capacity of infrastructure to support potential levels of growth, and in particular the road network. It is recognised that there is a limited highways network on the Hoo Peninsula and the majority of traffic passes through the Four Elms Roundabout. CCE note that this has already been identified as a congestion hot spot and that work is progressing to increase capacity in this area.

However, it is also noted that it is likely that the current scheme would not provide sufficient capacity to meet the needs of a larger development on the Hoo Peninsula, and that further infrastructure investments would be required before development could rise above a specific level. In addition, consideration should be given to providing an enhanced public transport offer, which would give a realistic alternative to car based travel and open up opportunities for rural residents. These will all be dependent on the scale of growth proposed to support, financially, such improvements.

In this regard, CCE are pleased that further assessments of the strategic transport networks and potential for upgrades are being tested and would be prepared to engage in this process.

Bus & Coach

There are a number of bus services which serve the Hoo Peninsula with all of these accessing the peninsula along the A228. However only a single service currently provides a service frequency of more than one per day.

A coach service is also provided by Clarkes of London with this running from the Isle of Grain via Hoo to London Victoria (routes 761 and 762). These routes offer 2 buses per hour during AM peak commuter periods and 3 buses per hour during PM peak periods. The service takes approximately 1 hour and 45 minutes between Hoo and London Victoria.

Cycling

National Cycle Network 1 (Dover to the Shetland Isles) provides connection into the Peninsula from both Gravesend to the north and Rochester to the south. National Cycle Route 179 is the Heron Trail. The Heron Trail, identified in Figure 2.2, is an 18 mile (29 km) circular route on Hoo Peninsula using quiet lanes running through Hoo before turning north to provide connection to High Halstow and Cliff. The route ties in to National Cycle Network 1 at Chattenden and Higham thereby providing a continuous route into the central area of the peninsula. Route 179 runs through Hoo along Main Road and Stoke Road. To the east of Hoo it runs along Ropers Lane and Ratcliffe Highway, directly adjacent to the A228, before turning north towards High Halstow.

Lower Thames Crossing

Highways England has recently consulted on a significant new piece of highway infrastructure involving a new crossing of the Thames located east of the existing Dartford Crossing. A preferred route option has been identified.

Site Description and Feasibility for Housing Sites

CCE appointed masterplanners JTP to undertake initial feasibility studies for the rural towns. The initial findings demonstrate that, taking into account the sites and their individual opportunities and constraints, the sites could be suitable for residential development at the following scales:

- 1 **Allhallows:** Proposed development could infill the greenfield land to the west of the existing settlement and would not lead to any coalescence between existing settlements. There are no overriding ecological or archaeological constraints. Access could be achieved from Avery Way. The Allhallows site is located on the far east of the peninsula with access provided from the A228 via two routes albeit one, Ratcliffe Highway, provides the more appropriate access route. Whilst the existing single carriageway arrangement will likely prove sufficient for connection to development in this location, it may be necessary to improve the alignment to provide a more direct connection.

This option would, therefore, represent a sustainable residential extension to the existing Allhallows settlement to support the existing primary school, local shops and doctors surgery.

As the site is sustainable and accessible with no overriding constraints, we consider that there is scope for either small scale limited residential development to development or a more strategic scale to include mixed-use development and open space.

- 2 **Lower Stoke:** There is scope to provide new development to the west of the existing settlement, potentially either side of Cuckold Green Road. Access could be from Grain Road (A228) and All Hallows Road.

This offers the potential for a sustainable extension to the existing settlement which would help to support the local shops, schools and services. Depending on the scale of development a new primary school could be provided, but this would be dependent on the wider strategy for the surrounding area on the Hoo Peninsula.

As the site is sustainable and accessible with no overriding constraints, we consider that there is scope for small scale residential development, with the potential scope for some mixed-use development, and open space.

Lower Stoke has the potential for further expansion in the longer term, with the residential area extending further west as a second phase on land safeguarded for development.

- 3 **Stoke:** This is a much smaller settlement with limited existing facilities. As such, the scope for expansion is more limited, and would not support additional facilities. Limited expansion could be to the south in the form of infilling.

Feasibility for Employment Site at Kingsnorth

CCE and their consultant team have undertaken a number of assessments and a land capacity study to identify the potential of the land within CCE ownership to deliver employment growth.

Initial feasibility work demonstrates that land to the north of the existing Kingsnorth employment area and south of the railway line would be suitable for expansion in the short term. However, it is considered that this could be extended further to the north, across the railway line, to provide a larger scale of development of employment land.

Strategic Transport Enhancements

As noted above, at present the Four Elms Roundabout acts as a future constraint to the movement of increased traffic to and from the Hoo Peninsula. Upgrades to this junction are proposed under the planning application for the proposed Lodge Hill development scheme. These improvements incorporate a significantly enlarged junction incorporating signalisation of the junction. Whilst this provides sufficient headroom for the Lodge Hill development, to facilitate new settlement proposals across the peninsula further improvements will be required.

The next stage for development of the roundabout would be to consider options to provide free flow lanes as well as a cut through of the central island. In practise this will likely prove insufficient and would restrict wider growth aspirations across the peninsula. To provide a comprehensive solution full grade-separation would likely be required.

A re-construction of the Four-Elms roundabout into a fully grade-separated interchange would also enable a bus link to be incorporated between the A289 and A228 and as such facilitate the public.

Subject to the scale of development on the Peninsula, some improvements to the bus service may be feasible.

Conclusions

In summary, CCE seek to encourage Medway to ensure that emerging policy creates a positive vision for the Borough, is consistent with the NPPF and allocates sustainable sites for housing, and employment in line with the established need that are sustainable and deliverable.

For this reason, CCE support Growth Scenario 3 and consider that their sites at Hoo St Werburgh, Allhallows, Lower Stoke and Stoke are suitable for providing new homes to meet the housing requirement, both in the short and longer term. This could be achieved by first (in the short to medium term) expanding Hoo St Werburgh as a service centre for the peninsula and then, in the medium to longer term, growing the existing smaller settlements. This will help the borough to meet their housing requirement and ensure that development is focused in an accessible location that supports and enhance the local community and existing services.

Land at Kingsnorth could deliver much needed employment growth.

We consider that the suggestions set out within these representations will assist in ensuring sustainable, viable and deliverable development within Medway to help meet the Council's vision.

The logo for Lichfields, featuring the word "LICHFIELDS" in white, uppercase, sans-serif font, positioned within a black L-shaped graphic.

Please contact us if you have any queries regarding these representations. Due to the complexities and potential of our client's sites, we would welcome the opportunity to meet with you to discuss this site and the emerging Plan further.

Yours faithfully

A black rectangular box redacting the signature of Marie-Claire Marsh.

Marie-Claire Marsh
Senior Planner

Planning Policy Regeneration, Community & Culture
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Date: 23 February 2017

Our ref: 04051/03/MBa/SGi/13362774v2

Dear Sir / Madam

Medway Council Local Plan 2012-2035 – Development Options Regulation 18 Consultation Report: Representations on Behalf of Bourne Leisure Ltd.

On behalf of our client, Bourne Leisure Ltd., please find below representations on the Medway Local Plan 2012-2035 – Development Options Regulation 18 Consultation Report (January 2017), published for consultation until 6 March 2017. Bourne Leisure has previously commented on several Medway Local Plan consultations, the most recent of which was the Issues and Options consultation document by way of representations dated 22 February 2016.

We now set out comments on the Medway Local Plan Development Options document in response to the policy approaches proposed in relation to:

- 1 Delivering Sustainable Development
- 2 Employment
- 3 Natural Environment and Green Belt
- 4 Sustainable Transport
- 5 Minerals, Waste and Energy

By way of background to these representations, Bourne Leisure operates over 50 holiday sites in the form of holiday parks, hotels, and family entertainment resorts in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within Medway, Bourne Leisure operates the Allhallows Holiday Park.

For the Company to continue to attract customers and to respond to changing market conditions, Bourne Leisure needs to invest regularly in order to provide new and improved facilities and accommodation.

For many of Bourne Leisure's holiday parks, improvements often necessitate the expansion of sites in order to decrease densities, improve the quality and amount of accommodation, and increase the range of facilities in order to extend the holiday season to provide more of a year-round attraction (accepting the Parks will always be closed for a period of time each year).

Nationally, many of Bourne Leisure's sites are located in rural and / or coastal areas, often adjacent to, or incorporating, environmentally and ecologically sensitive sites. The Company also has significant experience

of taking into account the need for protection and enhancement of such sites as part of day-to-day operations and when drawing up development proposals.

Delivering Sustainable Development

It is Bourne Leisure's view that the economic, social, and environmental strands of sustainability have the potential to outweigh harm in relation to one another, and the Company fully endorses the notion of considering development proposals holistically, consistent with the National Planning Policy Framework. The need to conserve the natural environment should be balanced against the need to ensure that economic development is not unnecessarily restricted.

Given the significance of tourism within Medway both now and in the future, as recognised in the consultation document, it will be important for the emerging Local Plan to demonstrate in-principle support for new development, subject to case-by-case consideration involving balancing the above referred-to objectives. In other words, plan policies should be worded so that new development proposals can each be considered on their own merits against a list of criteria. Emerging policies should therefore be positively worded, to support sustainable growth in principle; for the visitor economy, the detailed criteria of the relevant policies should endorse new development in the form of high quality tourism proposals that increase the quality of Medway as a visitor destination and enhance tourist accommodation, reflecting the current and future economic importance of tourism here. As currently stated in the Policy Approach to tourism, improvements to existing operations should be given as much - if not more - policy support than new tourism-related development.

It is to be expected that local planning policy will encourage new development to be distributed in such a way that the need for travel is reduced, and that sustainable methods of transportation are promoted, in order to reduce greenhouse gas emissions across Medway. In the context of the emerging Local Plan taking the approach of seeking to maximise sustainable travel, it should also recognise that, in particular, many tourism developments - including Allhallows Holiday Park - are of necessity and, for the most part, car-dependent. This is due to their locations and the activity concerned, although it should be noted that family use of the private car is prominent. Bourne Leisure therefore considers that the emerging Local Plan needs to ensure that future development potential is not inhibited due to seeking to limit private car use and it not being fully catered for by continuing poor public transport accessibility – particularly as the expansion and enhancement of existing facilities such as at Allhallows can contribute greatly to the wider economic sustainability of Medway.

Also as a matter of principle, Bourne Leisure endorses a planning policy approach that promotes the incorporation of sustainable development principles within buildings. The Company already ensures that all new buildings and refurbishments of existing venues incorporate the use of LED lighting, efficient heating and cooling solutions, and occupancy sensors. The use of heat pump technology is also designed to benefit from the maximum use of natural ventilation and natural daylight. The Company's hire fleet holiday homes have been developed in recent years to include increased levels of insulation, efficient boilers to provide heating and hot water, LED lighting both internally and externally, occupancy sensors to limit energy use in periods of non-occupancy, and double glazing.

Response to Policy Approaches

Employment

Economic Development

In addition to the specific 'policy approach' for tourism, Bourne Leisure considers that the growth of the tourism economy should be recognised in the Council's overall policy approach to economic development ; it would have been appropriate to include tourism in the list of 'policy approach actions' for economic development that the Council will support. It is vitally important to recognise, within the overall approach to economic development in the emerging Plan, the crucial and integral role the visitor economy plays within Medway at present, and in addition, how it can contribute to economic development growth in the future. It is the Company's view that the visitor economy and wider tourism sector should be fully recognised as a key means of contributing to the future growth of Medway's economy. In particular, and to build on statements made elsewhere in this consultation document and in the previous Issues and Options document, Medway should be promoted as a year-round tourism destination with a wide range of good quality accommodation, facilities, and attractions.

Long-established tourism operators such as Bourne Leisure already employ a significant number of people within the south east region. It is critically important that Bourne Leisure's (and other operators') current contributions and future scope for growth are fully recognised and built upon, in relation to the approach taken to the role of tourism in economic development in the emerging Local Plan, when identifying the key issues for the economy as a whole.

Rural Economy

Bourne Leisure welcomes the Council's approach of supporting sustainable rural tourism and leisure activities that are in keeping with their rural setting.

In the previous Issues & Options consultation document, it was acknowledged that much of Medway's agricultural land lies close to existing settlements and is of interest for potential development; this locational observation is equally applicable to the Allhallows Holiday Park, which in addition lies within the developed coast. As a consequence, Bourne Leisure wishes to reiterate the point that not all development outside settlements will negatively impact on key landscapes, and therefore would encourage a policy approach to the rural economy, and specifically to tourism, that allows development proposals to be considered on their merits, on a case by case basis in relation to their tangible economic, social, and environmental benefits, and their impacts and proposed mitigation measures where applicable.

Tourism

Bourne Leisure welcomes the Council's reference to Allhallows in paragraph 5.35 and the proposed principles for assessing tourism development proposals. It is critically important in developing these principles into a draft policy that Bourne Leisure's (and other operators') current contributions to, and future scope for further growth are fully recognised and built on not only in relation to the proposed approach to be taken to the overall role of tourism in the emerging Local Plan, but also in the context of promoting economic development.

The Company would suggest that the Council should therefore refer in emerging policy to the enhanced role of Medway as an important tourist destination, where improvements to the quality of existing and new tourist-related facilities and accommodation will be encouraged, in order to extend the tourist season, generate additional, less seasonal employment, and attract additional tourism-related expenditure.

Visitor Accommodation

In addition to promoting the provision of additional visitor accommodation as a matter of principle, Bourne Leisure concur with the proposed Policy Approach for tourism and agree that the emerging Local Plan should specifically endorse opportunities for the expansion and improvement of existing holiday parks, such as Allhallows Holiday Park, and acknowledge the invaluable role that existing tourism accommodation and facilities currently play within Medway..

The Company considers that the Local Plan should also specifically acknowledge the importance of holiday parks in providing visitors with choices in terms of where they stay, and recognition should be given to how high-quality static holiday caravan and holiday chalet sites make a vital contribution to providing a variety of high-standard tourist accommodation within Medway.

In addition, Bourne Leisure considers that recognition should be given in policy to the ongoing requirement for operators to consider continuously upgrading and carrying out improvements to tourism facilities such as caravan parks, so as to meet visitors' expectations. The emerging Local Plan's policy for caravan parks should recognise that such improvements may require some expansion of site area, for example, in order to provide enhanced landscaping as an integral part of an expanded Park.

The enhancement and improvement of existing visitor accommodation and facilities is required to meet visitors' requirements and to help attract increasing numbers of 'overnight', higher spending visitors to Medway.

In summary, Bourne Leisure therefore considers that a specific, positively worded and criteria-based policy should be included in the emerging Local Plan, to encourage the upgrading and extension of existing holiday parks. The creation of an improved tourism offer that builds on existing provision holds a unique opportunity to increase the length of visits within the area. An extended visitor season would provide longer term visitor interest, ensure a better quality all-year visitor economy and boost local employment and spin-off benefits to the wider economy. By helping to reduce the seasonal nature of the tourism industry within the area, Medway's tourism sector will remain competitive, profitable, and sustainable.

Natural Environment and Green Belt

Landscape

Bourne Leisure recognises the importance and value of Medway's natural environment. In this regard, the Company considers that policies for the natural environment should include reference to balance, and the consideration of the social and economic benefits potentially arising from the enhancement (and, where appropriate, extension) of existing tourism developments. Accordingly, future decisions should take full account of the specific characteristics of each development proposal and noting any proposed mitigation measures, assess whether it makes a positive contribution to protecting or enhancing the environment, when considered on a case by case basis. It is therefore considered that the importance of balancing environmental concerns with the economic and social benefits of development should be a key approach and policy theme throughout the emerging Local Plan.

In particular, the emerging Plan's policies should support limited new developments in or adjacent to sensitive locations, with proportionate mitigation where required. Such developments would include the enhancement and expansion of holiday parks, for which a countryside or coastal location is essential.

Emerging development management policies should also recognise existing land use and development potential when determining the role of the landscape. For sites such as Allhallows Holiday Park, which is in an environmentally sensitive location, it is important that emerging Local Plan policies do not preclude

appropriate development where any potential impact can be counteracted by commensurate mitigation measures, implemented to address both direct and indirect impacts.

Flood Risk

Bourne Leisure considers that it will be important for the Local Plan's policies on flood risk to be drafted so as to ensure the taking into account of the specific characteristics and vulnerability of particular uses, when considering the effects of flood risk. For example, certain tourism uses need to be, or remain located adjacent to water in order to continue to attract visitors. In addition, it is important for consideration to be given in policy to whether the residual risks of flooding to people and property are acceptable and can be satisfactorily managed and whether the proposed development would make a positive contribution to reducing or managing flood risk. In particular, the Company considers that in regard to the consolidation and expansion of existing tourism accommodation and holiday parks sites within flood risk areas, only the extent of the new development site within or adjacent to the existing holiday park, and not the whole site, should have to be assessed sequentially.

Consequently, Bourne Leisure's view is that proposals for the improvement or expansion of existing tourist accommodation and facilities should be considered on a more flexible basis than new development at such locations. These more flexible considerations should include taking account of the specific characteristics of current uses, and the merits of each individual proposal. Emerging policies should explicitly recognise that new tourism-related development can be justified in areas of flooding in such circumstances, particularly where it provides regenerative benefits and increased contributions to the sustainability of the local economy.

In regard to climate change and the associated flood implications, Bourne Leisure considers that the forthcoming Local Plan should take account of the specific characteristics of different land uses, and in doing so, recognise the importance of maintaining and retaining existing tourism uses. Priority should be given to defending existing properties from flooding, particularly as it is often impractical and financially unviable to relocate existing development, such as holiday parks. Owners and operators should be able, via local plan policy, to provide and maintain defences that would allow them to continue to run their businesses in situ, and expand where appropriate.

Sustainable Transport

Transport

As referred to above and whilst Bourne Leisure endorses the proposed Policy Approach to increase the use of public transport and rates of walking, the Company would emphasise however that in the case of some land uses such as tourism, there is often no feasible alternative available, other than the private car, for reaching more remote areas.

There is therefore a need for the policy and any supporting text within the emerging Local Plan to recognise in relation to tourism uses, such as holiday parks which are car dependent, that there is often no feasible alternative available other than the private car for access.

Bourne Leisure therefore considers that the emerging Plan should promote non-car modes of transport where applicable, but recognise the reality of car-based access, particularly in terms of tourism-related development.

Minerals, Waste and Energy

Renewable and Low Carbon Technologies

Bourne Leisure endorses the widely accepted view that the proposed Local Plan approach to the consideration of wind turbines should specifically take into account the potential effect on sensitive receptors – these would include holiday accommodation in the form of caravan parks. It is pertinent that Medway in this context acknowledges the important relationship between the quality of the natural environment, the role of tourism, and its contribution to the local economy – all as referred to above. It is therefore vitally important that any proposals for on-shore wind turbine development should be determined with a balanced and pragmatic approach, to ensure that the tourism industry and in turn, both the local and regional economy, are not harmed.

We trust these representations are clear and will be considered and reflected fully within the drafting of the Medway Local Plan. Please do not hesitate to contact me should you require any clarification of any of the points made. We would also be grateful if you would keep us informed in the future of any further consultation stages on the Local Plan and any other emerging local development documents.

Yours faithfully



Margaret Baddeley
Planning Director

[REDACTED]

From: Lola A [REDACTED]
Sent: 03 March 2017 06:29
To: futuremedway
Cc: cuxtonparish@btconnect.com
Subject: Medway local plan - you can not build new housing without addressing dire school situation

Follow Up Flag: Follow up
Flag Status: Completed

Hi,

We have moved to Cuxton from Bromley November last year. The area attracted us with beautiful views, nature and peace and quiet. We are first time parents so have not done much research on schools assuming that our 5 year old will easily get a space at Cuxton Infant School, like he would in Bromley.

To our horror we discovered that not only Medway council is desperately struggling with school admissions (process took us way beyond normal period) but also that the area overall has problems with primary schools - many of them are inadequate or require improvement. There is clearly a primary school crisis in Medway that is not being addressed.

My son ended up having to go to a school 3 miles away from where we live (I do not drive so lost any opportunity to drop him off or collect him and interact with his school) and we had to settle with the school Requiring Improvement as we were given no choice by Medway council.

You SHOULD NOT be even considering building any residential housing on Sundridge Hill, along Station road or near cinema complex until you: 1) sort out your school admissions process - you have to employ more competent, honest people following the process!! we had your staff lie to us just to get rid of us and not do their job, 2) improve primary schools - there is clearly a shortage of good schools, 3) make everyone moving into this area aware of the dire situation that primary schools are in before they move.

I am considering writing to Ofsted, Local Government Ombudsman and Rightmove about my concerns - I believe they should monitor the situation and prevent you from building housing without creating the right infrastructure (schools, GPs, roads), and Rightmove should include warning in capital red letters for anyone considering Medway/ Cuxton that schools are in a horrible state and people should consider moving elsewhere.

As much as I enjoy living in Cuxton, I am now considering moving elsewhere and do regret leaving Bromley - as my little one's school situation was so much better before moving. You are not doing your job in respect of primary schools and so should absolutely not increase population in this area without considering improving existing/ creating good schools, creating new GP surgeries, expanding roads and addressing the rest of the infrastructure. You are creating a mess otherwise and not developing the area.

Best regards,

Lola

[REDACTED]

From: Lyn Griffiths [REDACTED]
Sent: 14 February 2017 17:24
To: futuremedway
Subject: Medway Local Plan 2012 - 2035

Follow Up Flag: Follow up
Flag Status: Completed

Hi,

I am writing to oppose the above plan especially with regard to site 837 the farmland west of Church Street, Cliffe.

I am led to believe that it is at Stage 4 and that there is one more SLAA sift/consultation planned. This land should not have even got to this stage.

With regard to the site the land is high grade agricultural land (grade 1) and food security. The NFU have reported that they cannot afford to lose any more agricultural land. Food security in the UK is only 50% self sufficient and the recent bad weather in Southern Europe has highlighted how quickly food shortages can happen.

The government states in their National Planning Policy Framework Guidelines that when allocating land for development the local planning authorities should take into account the quality of the land and that it should be brownfield and areas of poorer quality land in preference to that of higher quality i.e first brownfield then Grade 3 and below before they start looking at the most productive and most versatile land.

The farmer who is currently farming the land is very keen to continue farming it and according to the Medway Landscape Assessment March 2011 Cliffe is part of the Cliffe Farmland landscape area and should not therefore be changed for housing.

The Grade 2 land in Cliffe Woods west of Town Road does not have green lights next to it but Cliffe higher Grade 1 land does, which does not make sense.

These are the main points of my opposition, but I list below my views on all other aspects.

1) The proposed houses as per the current plan will destroy the village completely. Currently there is still a community where residents know one another and this will be destroyed.

2) Parking is already a very large problem. More and more cars are parking in our cul-de-sac. Residents are now not only parking their own cars, but are now also bringing their work vans/lorries adding to the congestion we already face. The entrance to our road has vans/lorries parked on the pavements on the corner of our road and if there was to be an emergency then an ambulance/fire engine would have no chance of gaining access as we are a cul-de-sac. Residents from other roads that are unable to park in their own roads are now using our parking area. By building more houses this problem will get worse. The B2000 which is already extremely busy especially with the lorries and Nationwide Platform vehicles which barely fit the road using it will get even worse. More vehicles, more accidents.

3) Currently there are only two small shops in the village and one doctor's surgery. This will not be enough to support the large developments as outlined in the proposed plan. It is not easy to get a doctor's appointment at the moment let alone in the future. School places are also under pressure.

4) Nowhere in the overall plan is there any mention of a new hospital. I don't think Medway Hospital can cope with any more patients. We are forever hearing on the news that hospitals cannot cope with the number of patients. How about building a new hospital instead of increasing the number of houses.

5) The new residents in Cliffe are likely to be mainly from London as the housing will be cheaper and therefore they will have to commute to London to work. Higham station has no more parking spaces available after 7 a.m on a weekday as it is so congested with commuters.

6) Local public transport is also an issue as buses are few and far between.

7) With the new proposed development noise levels will increase mainly from the increased traffic and the increase in the number of people.

Pedestrians will be at risk.

8) Also if the proposed new crossing goes ahead at Shorne there will be more pollution in the area along with increased noise levels and more disturbance.

The reason we moved here in 2011 is that as birdwatchers we liked the rural aspect of Cliffe. From our house we can see nothing but agricultural land and the views are wonderful. What is being proposed will destroy the aspect that we moved to Cliffe for and it will no longer be a village, but will erupt into a town.

Lyn Griffiths

[REDACTED]

Dear Sir or Madam,

I am writing about
the Draft Vision and Strategic Objectives
outlined Plan 2012-2035.

I would like to raise my concerns
regarding the considered development
at Cliffe at both suit.

1. The school is full now, so it will
get bigger and the children and teachers
will lose the small Village friendship.
The doctors are full as well and it
is hard to get to see a doctor now.
2. our Sewage System is old, so it
requiring costly upgrade or replacement,

now, ~~but~~ with the large lorries, coaches
and cars it is dangerous.

4. You can not keep using grade 1
agricultural land there will run left
to grow food.

We all so stop the the land owners
from making easy pickings and the
villagers and farmers poor losing a rural
life.

yours
M. Dray

Alison Broom
Chief Executive

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Ms Catherine Smith
Planning Policy
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

(BY EMAIL: planning.policy@medway.gov.uk)

Date: 08 February 2017

Dear Ms Smith

**MEDWAY COUNCIL LOCAL PLAN 2012-2034 – DEVELOPMENT OPTIONS
REGULATION 18 CONSUTLATION**

Thank you for the opportunity to comment on this stage of the Medway Local Plan. As you may be aware, Maidstone Borough Council received the Inspector's Interim Findings in December 2016, and has within the last couple of weeks completed the last scheduled session of the Examination in Public hearings. A series of Main Modifications to our Local Plan will now be subject to public consultation during spring 2017.

In regards to the Medway Local Plan Development Options consultation, the Borough Council wish to make the following representations.

Duty to Cooperate

MBC would like to confirm its agreement to the position set out in paragraph 2.30 of the Local Plan that states that Medway Council has engaged in 1:1 meetings with local planning authorities, insofar as MBC is concerned. Officers at MBC look forward to continuing to work closely and constructively with Medway Council on relevant cross boundary matters between the two authorities.

Housing Target and Strategic Housing Market Assessment

MBC notes the Objectively Assessed Need (OAN) of 30,000 new homes within the North Kent Strategic Housing and Economic Needs Assessment (SHENA) and the Regulation 18 Local Plan sets a housing target commensurate with this to deliver sufficient land for up to the 30,000 dwellings. Paragraph 3.7 identifies a pipeline of 18,206 dwellings and the plan identifies a range of development options to meet Medway's housing needs over the plan period, including; maximising the potential of urban regeneration, suburban expansion, Hoo Peninsula focus (Rural focus) and Urban Regeneration and Rural Town. Whilst it is acknowledged that these options are a starting point for the consideration of the development strategy and allocations for the new Local Plan, we have some initial comments on the development options that are set out below. Going forward we welcome being consulted on more specific details at future stages in the plan making process.

MBC is supportive of Medway's approach to meet its needs within its administrative area and we agree with paragraph 3.9 which states that it is unlikely that the full range of development needs could be met solely in the identified regeneration areas on brownfield land. It is noted that three of the development options include development around Rainham and Hempstead, which could have a significant impact on M20/J7 and the southern end of the A249. This junction already suffers from traffic congestion at peak times and requires capacity improvements in order to accommodate planned growth in Maidstone borough. Development across Medway is likely to impact on the highway network at Bluebell Hill, M20 J6 and potentially at Boxley Road. It is important therefore that the potential impacts of Medway's proposed growth on the road network within Maidstone borough are properly assessed through the emerging Local Plan.

The promotion of the Capstone Valley as a green infrastructure allocation is welcomed by MBC. This allocation recognises the high quality landscape of the Capstone Valley and maintains the separation of Medway and Maidstone.

Medway Council will be aware of our previous concerns in regards to the housing market area geography analysis within the SHENA, as set out in our response to the Medway Council Issues and Options consultation and set out by email on 27 October 2015.

Paragraph 2.103 and 2.104 of the SHENA recognises that whilst there are strong relationships between Medway and Maidstone, they are however not consistent across the full local authority area. We welcome recognition in the SHENA that the

strongest relationship is with the north of the borough. This is in line with the Maidstone Local Plan Inspector who has concluded in his Interim Findings (ED:110) that there is a small part of the Borough's existing stock that abuts the Medway towns, however there is little development potential in that area and it is appropriately included in the Maidstone HMA for the purposes of the assessment.

Employment

It is noted by MBC that Medway commissioned an Employment Land Needs Assessment in 2015 that projected the growth of 17,000 jobs and the need of 90ha of employment floorspace in Medway over the plan period. The findings indicate that although there is a potential surplus of employment land available, this existing land supply does not align well to business needs. Paragraphs 5.19-5.21 suggests that the employment needs could be met through retention of existing employment sites, support for enhancing and consolidating current sites to better meet the market's requirements, by making better use of existing sites, and by identifying additional locations. It is noted that the legend for the development options shows 828ha of new/enhanced employment land however we would welcome clarification on the potential quantum and location of new employment floorspace.

As you will be aware from our DtC discussions earlier this week, the MBLP Inspector has highlighted the need to consider the strategic implications of employment provision across the relevant Functional Economic Market Area and we attach a copy of the Interim Findings report and our update paper in response to this matter for your information.

We would welcome more detailed discussions through the DtC if the sites in the Lordswood area and at M2 J4 are progressed. These areas are close to the boundary with Maidstone and development of these areas could have implications in terms of infrastructure provision, including potential highway impacts, within Maidstone borough in the future.

The proposed policy approach for employment states on page 47 that Medway will support actions, amongst other things, to accrue benefits for Medway's economy from strategic developments of infrastructure, housing and employment sites outside the Medway area. The implications of this statement for development in Maidstone are unclear and we seek clarification on this matter.

Transport

MBC notes section 11.8 of the Plan which states that Medway Council has commissioned a new strategic transport model to support the emerging Local Plan, which is anticipated to be completed by spring 2017. This model will be used to assess the cumulative impact of development and associated mitigation strategies for the plan period. As set out above, we would expect that the potential impacts on Maidstone borough would be appropriately assessed through the modelling work.

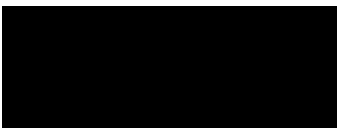
MBC supports the ambitions contained within this chapter to increase sustainable modes of transport, such as public transport provision and improvements to the walking and cycling network. Medway and Maidstone have good transport connections through both rail and bus services and we welcome further discussions on potential improvements to transport networks between Maidstone and Medway.

Gypsy and Traveller Accommodation

It is noted that Medway Council is seeking to refresh its evidence base for the assessment of the need for gypsy, traveller and travelling showpeople accommodation, in line with the Government Policy issues since the 2013 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) was produced. MBC's position is that identified needs will be met through permanent consents, site allocations, turnover of the two public sites in the borough and an allowance for consents coming forward on unidentified sites.

Thank you again for consulting the borough council and we looking forward to on-going, productive discussions with yourselves as our plans progress.

Yours sincerely,



Mark Egerton
Planning Policy Manager

INTERIM FINDINGS FROM THE EXAMINATION OF THE MAIDSTONE BOROUGH LOCAL PLAN

22 December 2016

Robert Mellor BSc DipTRP DipDesBEnv DMS MRICS MRTPI

An Inspector appointed by the Secretary of State for Communities and Local Government

The scope of these findings

This paper has been produced to address a number of main matters which have been discussed at examination hearings to indicate where main modifications may or may not be required to make the Plan sound. It does not cover every matter but it provides a broad overview. It is also intended to assist in identifying where further work may be needed to support an update of the proposed changes that have already been prepared by the Council and which will form the basis of draft main modifications to the Plan (to be supported by revised sustainability appraisal) which would then be subject to public consultation. Such main modifications are also likely to include additional and typically more detailed matters which have previously been the subject of changes proposed by Maidstone Borough Council. These have been the subject of discussion at Examination hearings.

These are interim findings only. Final and fuller conclusions on the matters and issues referred to below will be set out in the Final Report at the end of the Examination process.

Matter 1: Duty to Cooperate

Issue – Whether the Local Planning Authority and other relevant persons have complied with the Duty to Cooperate?

1. S33A of the P&CPA sets out a statutory 'Duty to Cooperate' (DtC) which here applies to Maidstone BC and other local planning authorities, to Kent County Council, and to other persons prescribed by Regulation 4 of the Town and Country Planning (Local Planning) England Regulations 2012 (the Regulations).
2. The duty requires those persons to cooperate with other persons to 'maximise the effectiveness' with which named activities are undertaken. Those activities include the preparation of development plan documents (such as this local plan) and activities that support that activity 'so far as relating to a strategic matter'. A strategic matter is defined by S33A(4) in summary as: (a) 'sustainable development or use of land that has or would have a significant impact on at least two planning areas' (a planning area in this case is the area of a borough or district council); and (b) 'sustainable development or use of land in a two tier area' (as this is) 'if the development

or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter'. County matters broadly relate to minerals and waste and associated developments as defined by Paragraph 1 of schedule 1 to the Town and Country Planning Act 1990 (as amended).

3. S33A(7) requires persons subject to the DtC to have regard to any guidance issued by the Secretary of State about how the duty is to be complied with. In that regard Paragraph ID 9-004-29140306 of the Government's Planning Practice Guidance (PPG) confirms amongst other things that the duty to cooperate is not a duty to agree albeit that local planning authorities should make every effort to secure the necessary cooperation on strategic cross border matters before they submit local plans for examination.
4. A number of Representors have claimed that MBC as the local planning authority has not complied with the DtC. These claims are made mainly in relation to the following broad subject areas:
 - Cross border housing needs and supply
 - Cross border provision for economic development and employment
 - Provision of strategic infrastructure, especially transport
 - Cross border strategic gaps in development
 - Minerals Planning Issues
5. MBC has issued a Duty to Cooperate Compliance Statement [SUB 005] as recommended in paragraph ID 9-011-20140306 of the PPG. This was published after the closing date for representations on the submission plan and thus was not available when Representors were preparing their representations. It lists the relevant bodies and the forms and methods of cooperation undertaken over many years. This demonstrates that there has been extensive engagement notwithstanding that the minuting of meetings and their outcomes is sometimes incomplete.
6. The DtC Statement sets out the 4 strategic areas where there has been active cooperation under the following headings:
 - The homes needed in the area
 - The provision of employment, retail and commercial development

- The provision of infrastructure (includes transport)
 - The natural and historic environment
7. There has not been agreement between the Borough Council and all the persons with which there has been engagement under the DtC and that has impaired the ultimate effectiveness of cooperation. However the above national guidance confirms that there is not a duty to agree. Whether a lack of agreement raises an issue of soundness may be of relevance to other interim findings.

The evidence of the DtC Statement and supplementary evidence provided during the examination supports my conclusion that the Borough Council has engaged with neighbouring authorities and prescribed bodies to address strategic matters and has sought maximum effectiveness. It has therefore met the statutory duty set out in section 33A of the 2004 Act.

Matter 2: Objectively Assessed Housing Need (OAHN)

8. The National Planning Policy Framework at paragraph 47 provides amongst other things and in summary, that to boost significantly the supply of housing local planning authorities should:
- ‘Use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period’.*
9. Based on the 2015 Update of the Strategic Housing Market Assessment (SHMA) the submitted Local Plan identifies an Objectively Assessed Housing Need for 18,560 dwellings over the full Local Plan period between 1 April 2011 and 31 March 2031 (928 dwellings per annum).
10. The Housing Topic Paper [[SUB 005] records that 2,860 dwellings had been completed by 31 March 2016 and that there were extant planning permissions at 1 April 2016 for 5,475 dwellings (including a 5% non-implementation discount). That would leave a residual need for 10,225 dwellings.

11. A significant number of additional dwellings have either been permitted since 1 April 2016 or are the subject to a resolution to permit subject to the completion of a Section 106 planning obligation.

Issue - Whether the OAHN is based on the appropriate Housing Market Area

12. The Housing Market Area (HMA) for Maidstone as employed in the SHMA overlaps into Tonbridge & Malling Borough to the west. The Ashford HMA extends into Maidstone from the east. The SHMA has been commissioned jointly to assess needs in all 3 areas. Whereas a small part of the Borough's existing stock abuts the Medway towns there is little development potential in that area and it is appropriately included in the Maidstone HMA for the purposes of this assessment.

13. Housing Market Areas may need to be adjusted in the future to reflect changing migration patterns. However that is not necessary at this stage.

The Housing Market Areas have been appropriately assessed for the purposes of the SHMA.

Issue - What may be the contribution of local needs to the OAHN by comparison with migration from outside the Borough

14. Only about one quarter of the anticipated population growth in Maidstone is expected to come from natural growth of the existing population. The remainder is expected to result from net migration with about half of the total accounted for by internal migration from elsewhere in the UK including from London and from other Kent Boroughs or Districts. The remaining one quarter would come from international migration. The Annual Monitoring Report July 2016 records that the average total net migration inflow per year in the ten years up to 2014 was 1,317 people. That would equate to 13,170 persons over that period. The overall population rise in Maidstone between 2005 and 2015 is estimated at 21,146 persons including natural growth.
15. To seek to assess only those needs arising from the existing population would be ineffective in that continued migration from London or other areas could not be prevented and local people would likely be outbid in the market by those moving from higher value areas.
16. Whilst some Representors suggest that international migration will reduce as a result of Brexit, the current ONS projections only assume net international in-migration of 180,000 persons per year. The current rate of net

international in-migration is running at about 330,000 persons per year of which more than half are from outside the EU. That does not suggest that an early net reduction below 180,000 can be relied upon or that there is any reliable basis to amend the forecast need in Maidstone.

The OAHN has made an appropriate assessment of local needs and of those arising from migration from outside of the Borough.

Issue - Effect of the 2014-based household projections

17. Whereas the SHMA is based on the 2012 household projections, the ONS has since published 2014 based projections. These indicate a modest increase in need. However national PPG at 2a-016-20150227 makes clear that a new projection does not automatically mean that housing assessments are rendered outdated every time new projections are issued.

Whilst the latest information would need to be taken into account at the date of a Plan review, I do not consider that it is necessary to alter the assessment at this stage to reflect the 2014-based household projections and to do so would only delay the delivery of that housing for which the need has already been identified.

Issue - Whether the OAHN should be reduced because of a claimed previous over-supply of housing

18. Some Representors have argued that there has been a past 'spike' in housing delivery as a result particularly of high density flatted developments on brownfield sites at a time when there was a moratorium on greenfield development. That is claimed to have distorted the trends that have informed the ONS population and household projections. They point to advice in national Planning Practice Guidance at paragraph ID 3-036-20140306 that consideration can be given to evidence that the Council has delivered over and above its housing need in previous years and that past high delivery rates are no longer realistic.
19. However the South East Plan targets for Maidstone were not based on an objective assessment of needs in this Borough but were instead informed by wider regional and sub-regional assessments with individual targets for local areas that took into account a deliberate redistribution of population and households. Also there is no evidence that past delivery rates, which in any case were lower than now proposed, will not be maintained or exceeded. Office to residential conversions in Maidstone and other redevelopment are likely to continue to make a significant contribution to housing supply including high density flats. The SHEDLAA has identified extensive supply

elsewhere including greenfield development which had previously been precluded.

It would not be appropriate or necessary to reduce the OAHN because of alleged past over-supply of housing.

Issue - Whether additional provision should be made for increased population as a consequence of changing migration patterns with London or other migration from areas where supply may be constrained.

20. Representors have raised an issue as to whether adequate provision has been made for migration from London or from parts of West Kent where there are particular development constraints, notably the Metropolitan Green Belt.
21. There are disputes as to whether London is able to meet its own housing needs within its defined Housing Market Area in accordance with the London Mayor's previously stated intention. This relates both to whether those needs have been appropriately assessed and whether the London Boroughs have the capacity to meet the assessed requirement. An important consideration is whether insufficient housing supply in London or affordability issues will result in an uplift in migration from London to the rest of the South East including Maidstone.
22. The SHMA Update 2015 gave consideration to the potential effect of higher migration from London than that assumed in the ONS projections. Past migration figures at Table 28 of Document HOU 004 show that the net annual population flows from London to Maidstone averaged 760pa before 2008 but only 467pa in the period between 2007-2012 which is the period used for the ONS 2012 Sub National Population Projection. On the basis of a forecast that there may be a return to higher levels of movement in between these 2 rates a sensitivity analysis indicates that this could add demand for an additional 5.1% households in Maidstone. However the London Mayor has not requested that authorities outside London accommodate higher levels of migration and no additional allowance for higher migration has been included in the Maidstone OAHN.
23. The west Kent Boroughs of Tunbridge Wells and Sevenoaks have particular constraints on development including extensive areas of Green Belt. If they do not plan to meet their own assessed needs (including migration from London) then there could be increased migration to other areas such as Tonbridge & Malling (which has an overlapping housing market area) and

Maidstone. However whilst those Boroughs have identified an OAHN significantly above the annual housing requirement previously set by the South East Plan, they have yet to determine what their housing requirement should be in future years.

Whilst it is not impossible that increased migration from West Kent or London would place pressure on areas such as Maidstone with transport links those areas, this is a matter which would best be considered at the first Review of the Local Plan when policy provisions for London and west Kent will be clearer.

Issue - Whether the OAHN is based on an appropriate Average Household Size

24. Household size can significantly affect the projected need for dwellings. A long term trend towards smaller household sizes was arrested in recent years. This probably results from the suppression of household formation because of weak affordability, particularly for young people. However the planned uplift in the supply of market and affordable housing should improve affordability with a return to the trend towards smaller households.

The OAHN is based on appropriate Average Household Size.

Issue - Whether the OAHN should include a market signals adjustment for housing affordability

25. The OAHN figure of 18,560 dwellings in the submitted Local Plan includes an approximate 5% uplift for market signals. That equates to 45 dwellings per annum or a total of 900 dwellings over the full plan period.
26. At the examination hearings it was acknowledged by participants that the figure is arbitrary and lacks a scientific basis. The Home Builders Federation acknowledged that a 5% uplift would be too modest to make a difference to affordability and they sought a higher uplift. A modest uplift is unlikely to have a significant effect on market values, particularly if developers do not increase building rates by the same margin. In that regard representatives of the developer of the single largest housing site proposed for allocation told the Inquiry that they would be likely to deliver only 50 dwellings per annum rather than the 85 dwellings per annum previously advised. That 35dpa reduction alone would almost cancel out the 5% uplift which equates to only 45 dwellings per annum. Moreover new dwellings only account for a proportion of the total number of dwellings in the market which include many second hand properties.

27. A much more significant effect on market prices can be expected from the overall increase in past building rates that can be anticipated through the allocations in the plan. These are likely to at least double average completions during the early years of the remaining plan period. In these circumstances a still higher uplift is not justified.

I do not consider that the 5% market signals uplift would have the desired effect or is justified in this case. The OAHN figure should accordingly be reduced by 900 dwellings.

Issue – Whether a need for Additional Affordable Housing would justify and overall increase in housing provision

28. The Strategic Housing Market Assessment identifies an affordable housing need for 5,800 dwellings from 2013 to 2031. The Housing Topic Paper 2016 [SUB 005] identified a supply of 5,350 affordable dwellings from completions, commitments, allocated sites, broad locations and local needs housing on exception sites. That figure has already required revision to 4,961 following the reintroduction of Government policy to raise the threshold for developments where affordable provision is required. It will require further revision to reflect other changes in supply including a reduced supply from the Broad Locations. However there will be an opportunity at the plan review stage to identify further provision from alternative allocations. Additional supply is also expected from the activities of registered providers of social housing.
29. What effect a redefinition of affordable housing to include starter homes may have is uncertain and awaits further Government guidance. The SHMA Update also refers to the significant role of the private rented sector in Maidstone. Those who cannot obtain a mortgage sufficient to purchase in the open market are likely to sort to private rented housing and will pay a market rent which may or may not be supported by housing benefit. However this is not relied upon in the plan as part of the supply of affordable housing.

There is not a current justification to increase the overall housing need figure as a means of boosting the supply of affordable housing.

Matter 3: Housing Supply

Issue – Whether the housing supply proposed in the Local Plan is justified, effective, and consistent with national policy

Issue – Whether there are constraints on the supply of suitable sites that would justify a lower housing requirement which would not meet or exceed the OAHN

30. That England as a nation has for a number of years been building many fewer houses than are needed by a growing population and growing household numbers has been widely reported. The resulting pressures on the housing stock and associated issues of affordability are particularly acute in London and the South East. As one of the main urban areas in Kent, Maidstone town cannot be insulated from these pressures and must have a role in addressing them, including migration from other areas. It is also appropriate to consider the role that the Borough's other settlements can play, particularly those that already have supporting services and infrastructure, such as the railway stations that provide connections to London and other parts of the region.
31. A Core Planning Principle of the National Planning Policy Framework at paragraph 17 is that planning should: *'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.'*
32. More specifically in relation to housing, paragraph 17 provides amongst other things that: *'To boost significantly the supply of housing, local planning authorities should: use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.'*
33. In a letter to Helen Grant MP dated 24 September 2015 and attached to her Representation R19421, the then Minister of State for Housing and Planning, Brandon Lewis, made reference to the above guidance and confirmed that the housing need identified for Maidstone in the Strategic Housing Market Assessment is not the same as the housing requirement.

34. As the Minister pointed out: *'Once the need has been assessed the Council should prepare a Strategic Housing Land Availability Assessment [as it has] to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need. Once these constraints are taken into account the Council can decide how many homes it can plan for. It is against this figure that the five year supply of land is calculated'*.
35. The Minister also pointed out that national planning practice guidance: *'makes it clear that local plans can pass the test of soundness where local planning authorities have not been able to identify sites or broad locations for growth in the years 11-15 of the plan period.'*
36. In the case of Maidstone the amount of brownfield land that is available for redevelopment falls well short of the assessed housing needs. In common with most towns in South East England the main town has grown organically in the past. Whilst that external growth was paused for several years in the early part of this century that position cannot be sustained if the town is to make an appropriate contribution to housing needs. There are nevertheless particular physical constraints on expansion which include the proximity to the Borough boundary to the west, the presence of the River Medway, and the physical barrier created by the M20 motorway to the north.
37. Unlike in much of west Kent, the Green Belt covers only a small part of Maidstone Borough and therefore does not represent a significant constraint on development across the Borough. The main potential constraints of relevance to national planning policy are rather: landscape (especially the Kent Downs AONB and its setting); transport and other infrastructure; agricultural land quality; flood risk; and the natural and historic environment. In some cases such as flood risk and agricultural land value national policy provides for a sequential approach to site selection. Other policy tests also provide in various ways for the weighing of any adverse impacts with any public benefits.

Whilst development constraints are relevant considerations in Framework policies, they do not preclude all housing development or create a fixed capacity limit for the Borough. Rather it is necessary to assess locations individually and to apply judgements as to the impact of development there including whether what would be

significant adverse impacts can be adequately mitigated to allow development to proceed.

Because consideration of the relevant constraints involves judgements, there have been inevitable disagreements in the assessments of impacts as between the Council and those making representations on the Local Plan including those participating at the hearings.

Housing Strategy

Issue – Whether the plan is the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

38. Whilst the submitted Local Plan includes a Spatial Strategy set out in a single Policy SS1, it also includes other spatial policies that are strategic in nature. Some of the allocation and Development Management Policies are also wholly or partly strategic but are not clearly identified as such. The Council has been asked to reorder and amend policies so that the strategic policies are more readily identifiable.
39. A core planning principle of the National Planning Policy Framework at paragraph 17 is that planning should: *‘ actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable’.*
40. The spatial strategy set out in Policy SS1 of the submitted Local Plan appropriately seeks that Maidstone town is the principle focus of development to include making best use of available sites within the urban area, the town centre as the primary office and retail location and with strategic development to the north west and south east of the urban area. 5 rural service centres are identified as second tier locations for development with 5 large villages as third tier locations and restraint elsewhere.
41. Accessibility to services and facilities by sustainable modes will inevitably vary between locations and not all villages or suburban locations will have all services and facilities close at hand. However distance to facilities cannot be the only consideration. Other matters include infrastructure

capacity, congestion and site specific considerations such as the natural and historic environment.

42. The physical layout of the Borough including the existing distribution of settlements, the location of rail and road routes and landscape, flood risk and other environmental constraints all limit the reasonable alternative strategies. The Sustainability Appraisal appraised 5 alternative strategies for the distribution of housing development of between 18,600 and 19,600 dwellings. Two strategies involved a new settlement to the east of Maidstone but that was rejected because of the need for extensive new infrastructure and the harm to the area's character. The other rejected alternatives involved differing amounts of development at the villages, including whether or not there would be major development at Lenham. I consider that the alternatives have been appropriately assessed.

The Spatial Strategy set out in the Local Plan for housing development is consistent with national policy to manage growth patterns that favour sustainable means of travel whilst also taking account of other relevant factors.

The strategic policies in the Local Plan should be more clearly identified and distinguished from the non-strategic policies.

South East Maidstone

43. Policy SP3 of the submitted Local Plan proposes a Strategic Development Location comprising 6 housing sites in South East Maidstone on either side of the A274 Sutton Road. A key issue for these sites concerns highways and transport infrastructure. Some Representors including Kent County Council consider inadequate transport infrastructure to be a constraint that makes this location unsuitable for that development.
44. Maidstone currently experiences unusually high rates of car ownership and use, encouraged by the town's close proximity to the motorway network with 4 motorway junctions. Like other radial routes in Maidstone town which converge on the town centre gyratory system, the A274 Sutton Road already experiences congestion, particularly in the peak hours, as do the side roads that connect south east Maidstone to the A20 and M20 to the north of the town, avoiding the town centre. That congestion also affects bus services including a high frequency route that connects south east Maidstone to the town centre.

45. Under the heading 'Promoting sustainable transport', Paragraph 32 of the National Planning Policy Framework provides amongst other things that:

'Plans and decision should take account of whether:

- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- safe and suitable access to the site can be achieved for all people; and*
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

46. Of the 6 housing sites included in the SP3 allocation, sites H1(5) and H1(6) were previously allocated for development in the current Local Plan that was adopted in 2000. Both sites are now under construction and will together provide some 886 dwellings. In each case the planning permission for the sites was granted in 2014 and gave effect to a unilateral planning obligation under Section 106 of the Town and Country Planning Act 1990 which included a financial contribution to highway mitigation works on the A274. The works included bus stops, highway widening, bus prioritisation measures between the Willington Street Junction and the Wheatsheaf junction, and junction capacity improvements in the vicinity of Willington Street and Wallis Avenue. The need for such works had been identified in the adopted Local Plan and in Transport Assessment for each site.

47. In accordance with paragraph 32 of the National Planning Policy Framework those works include an identified opportunity for sustainable transport. This would improve the reliability and speed of the bus service during congested periods and make it a more attractive mode of travel. The obligations would have been taken into account as highways mitigation when the planning permissions were granted.

48. The Local Plan is required to have regard to the Local Transport Plan. The Local Transport Plan for Kent 2011-2016 [Document ORD 013] (LTP3)

provides that the Maidstone Transport Strategy and an Integrated Transport Programme *'will be driven by the desire to preserve and enhance the accessibility of Maidstone town centre by sustainable means. The proposed level of development will be underpinned by a package containing a number of traffic management measures including the enhanced provision and priority of bus services through the Maidstone Quality Bus Partnership involving the County and Borough Councils along with the town's principal bus operator, Arriva. These priorities will drive scheme delivery irrespective of the future development scenario, with the detail and phasing dependent on the specific sites that come forward through the Local Development Framework'*.

49. The Implementation Plan for the Local Transport Plan theme of a 'Safer and Healthier County (2011-2016)' identifies the sole method of air quality management as *'Provision of bus priority and traffic management measures to reduce congestion and improve traffic flow in Air Quality Management Areas.'*
50. Bus priority on the A274 Sutton Road would accord with those priorities and in any event had already featured in the adopted Local Plan of 2000. Whilst the Local Transport Plan refers to the then draft target of 10,080 dwellings in Maidstone Borough that referred only to a plan period ending in 2026, not 2031. In any case the Local Transport Plan states that the priorities will be retained irrespective of the future development scenario.
51. It is acknowledged that the Local Transport Plan 2011-2016 (LTP3) is due to be replaced by the Local Transport Plan 4 2016-2031(LTP4) which is currently at draft consultation stage [Document TRA 034]. The draft plan contains much less detail than LTP3. Nevertheless it does set out outcomes which include measures to improve air quality, reduce congestion and improve journey time reliability, and to promote affordable, accessible and connected transport. A relevant Countywide priority is to provide: *'Increased access to jobs, education and health by public transport, providing opportunities to Kent's residents without the need for a private car and therefore reducing road congestion. An integrated transport package remains a priority for Maidstone.*
52. The Examination was informed that payments specified in the above S106 obligations have already been made to Kent County Council as the local highway authority. However the County Council has stated that whilst it supports the junction capacity improvements it will not implement the bus

prioritisation measures on the grounds that they would disadvantage other road users. The County Council is seeking instead to divert the relevant funds to pay for exploratory work to develop a case for a new road from the A274 to the A20 which road it would join in the vicinity of Junction 8 of the M20.

53. Of the remaining 4 sites in the SP3 allocation, sites H1(7), H1(9) and H1(10) are the subject of resolutions by the Borough Council to grant planning permission subject to the completion of S106 planning obligations which would also include transport mitigation payments. These would include additional contributions to bus priority measures, the provision of new bus services connecting south east Maidstone to railway stations (including the main Maidstone East station which is to be a Thameslink terminus), and various junction capacity works including signalisation to address congestion at Junction 7 of the M20. There is no application as yet on the fourth housing site - H1(8).

54. Kent County Council has not objected to the allocation of sites H1(5) and H1(6) which in any event are already committed. In these circumstances it is unreasonable for the County Council to obstruct the bus priority measures in Sutton Road on which the decisions to permit those developments were based and which accord with:

- saved policies of the adopted Local Plan;
- the Borough Council's Integrated Transport Strategy
- the sustainable travel objectives of the County Council's own Local Transport Plan 3 - 2011-2016;
- the similar objectives the County Council's emerging Local Transport Plan 4; and
- paragraph 32 of the National Planning Policy Framework.

55. The installation of an extended bus lane in Sutton Road would certainly qualify as a sustainable transport mode which has previously been identified as suitable in this location and its installation would be cost effective in that developer funding is already available. It would accord with the objectives of the adopted Local Plan and both the current and emerging Local Transport Plans. It has been relied upon as mitigation for the already permitted developments. To divert those funds to a study of a relief road would at

best delay mitigation by up to 10 years and at worst may result in no mitigation if that road does not go ahead. Neither would that road promote sustainable travel or provide significant transport capacity for movements between South East Maidstone and the town centre.

56. The County Council has suggested that a bus lane would disadvantage other road users but has not produced substantive evidence to that effect. The A274 Corridor Study prepared for the Borough Council contradicts that stance. It demonstrates that a bus lane can be provided within the existing highway land whilst maintaining one running lane in each direction for other traffic as at present. A bus lane would enhance the speed and reliability of bus services and provide a strong incentive for modal shift from car to bus use that would benefit all road users including other car drivers.
57. The County Council has objected to the allocation of the remaining four sites within the SP3 Strategic Development Location. This is on the grounds that their interpretation of transport modelling is that after mitigation the residual cumulative impacts of development would remain 'severe'. That modelling included a series of junction improvements but did not include any bus priority measures. The Borough Council disagrees that the impacts would be severe.
58. There is no national definition of what may constitute a severe impact and the Secretary of State's decision in relation to the New Line Learning appeal in Boughton Lane (see below) does not provide one. That decision related to a particular development with access to the A229 and where adequate mitigation had not been identified. That decision has in any event been quashed and new transport evidence is likely to be before the Secretary of State when it is redetermined.
59. Whilst the various Sutton Road developments would generate additional traffic movements some mitigation measures have been agreed by the County Council to increase junction capacities.
60. The County Council wishes to develop a case for constructing a new road between the A274 and the A20 which would by-pass the villages of Leeds and Langley and provide relief to existing roads (including Willington Street and the B2163) with potential environmental benefits as well as reduced congestion. Modelling suggests it may also reduce the number of cars heading through the town centre to destinations beyond the town. Such a

road was included in the adopted Local Plan 2000 and was also considered in the context of a new settlement but proposals for that settlement and a road were later abandoned. A new road may follow a different route. The Borough Council is generally supportive but funding the road would be a significant challenge unless it were to support further major development. In any event it would be unlikely to be delivered until very late in the plan period or even outside the plan period. It would not support the provision of housing that is needed in the shorter and medium terms and to delay that housing on the basis that a new road could be a possibility would not be justified when other measures are already available to mitigate its transport impacts.

The Policy SP3 South East Maidstone Strategic Development Location will generate additional traffic but the concentration of development close to the town allows alternative means of travel to be made available and the development proposals include measures to mitigate the travel impacts include highway capacity improvements, and improved bus services supported by bus priority measures.

Other South Maidstone Allocations

61. Traffic congestion is also a key issue for housing allocations that would rely on access to the A229 road which joins the A274 at The Wheatsheaf junction. In particular this relates to allocations H1(29) New Line Learning and H1(53) Boughton Lane. Both sites would be served from the northern end of Boughton Lane which joins the A229 at its junction with Cripple Street (also known as The Swan junction) to the south of The Wheatsheaf junction. In the submitted Local Plan these sites are proposed for allocation for 220 and 75 dwellings respectively.
62. The Borough Council has proposed a series of changes (PC/27, PC/28 & PC/29) which would: reduce the H1(29) allocation to 180 dwellings (with associated density changes); amend the access arrangements from Boughton Lane; and require capacity improvements at The Wheatsheaf junction (in addition to those already required by the policy at The Swan junction).
63. In 2014 the H1(29) site was the subject of a refused planning application for 220 dwellings. The appeal Inspector recommended, and the Secretary of State agreed in early 2016, that the appeal should be dismissed for reasons which included that the proposed development would have a severe adverse impact on the highway network in terms of congestion and inconvenience to local residents and other road users and on the strategic transport planning

of the area generally, contrary to the aims of paragraph 32 of the National Planning Policy Framework (App/U2235/A/14/2227839). That decision was subsequently quashed for unrelated reasons but is to be redetermined. The Highway Authority did not object to the original application but does now object to the proposal subject to the appeal redetermination.

64. Compared to that appeal scheme the H1(29) allocation including the proposed changes would amend the dwelling numbers and access arrangements within Boughton Lane. A scheme to alter The Swan junction has also been investigated as a means of improving its capacity. The Council has also proposed the addition of a policy criterion relating to capacity improvements at The Wheatsheaf junction. However one scheme to improve capacity by restricting access to the Cranborne Avenue arm of that junction has already been rejected. The alternatives would require land acquisition, road widening and the relocation of services which measures have not been agreed. The Kent County Council as Highway Authority now objects to the proposed allocation on the basis that the mitigation would not be sufficient to avoid a severe impact and it has particular safety concerns about the proposed Swan junction improvements.
65. The A229 already carries more traffic than the A274 and is also likely to attract additional movements due to development at villages to the south of Maidstone and the withdrawal from the Local Plan of proposals for a park and ride site at Linton Crossroads which would have diverted some trips. Unlike the A274 road there is insufficient room within the highway to create bus priority measures that would encourage modal shift. A lack of capacity at The Wheatsheaf junction is likely to contribute to queues backing up and obstructing the Swan junction. Moreover Boughton Lane is itself already anticipated to carry significantly more traffic due to school expansion.
66. In all of these circumstances I do not consider the allocation of the H1(29) site to be sound. The H1(53) site is proposed for 75 dwellings which would also generate significant movements in the northern part of Boughton Lane. Without adequate identified mitigation that allocation is also unsound and that site allocation should also be deleted.
67. The H1(54) Boughton Mount site is a brownfield site for only 25 dwellings. It was included on a list of sites in South Maidstone to which the Highway Authority objected in its letter of 16 December 2016. However it would generate fewer traffic movements than the H1(53) site to which the Highway

Authority did not then object and some movements would have been generated by the site's previous use. The allocation should be retained.

68. Another site H1(55) for 40 dwellings at the junction of Church Road and Heath Road in Boughton Monchelsea may also generate additional movements on Boughton Lane. However traffic from that site has the opportunity to disperse to other routes and is likely to do so depending upon congestion levels on each route. Its development has not been objected to by the highway authority in relation to traffic impacts. This allocation should also be retained.

Having regard to the previous conclusions of the Secretary of State concerning development in Boughton Lane and because adequate mitigation measures for the impact on the A229 have not been demonstrated, allocations H1(29) and H1(53) should be removed from the Local Plan.

Policy H2 Broad Locations for Housing Development

69. Paragraph 45 of the National Planning Policy Framework provides amongst other things that local planning authorities should identify a supply of specific deliverable sites sufficient to provide five years' worth of housing and to *'identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15'*. Footnote 12 provides that: *'To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged'*.

70. The submitted Local Plan relies on 3 Broad Locations for the delivery of 3,500 dwellings.

H2(1) Town Centre Broad Location

71. The submitted Local Plan defines the whole town centre as a broad location for approximately 700 dwellings. During the examination the Council clarified that this would not include the other specific allocations proposed within the town centre and that neither would it include all windfall

development. The Council has also proposed a change which would increase the estimated number of dwellings to 990 such that the total delivery from all 3 Broad Locations would rise to 3,790 dwellings.

72. As the town centre covers a large area and development could take a variety of forms, including high density and mixed development schemes, there is uncertainty about how and where this housing would come forward. In further evidence to the examination the Borough Council has agreed that the policy should be modified so that delivery is concentrated firstly on 2 locations where change is anticipated in the plan period – The Mall and the Riverside Quarter. Both were previously identified in the Town Centre Study [Document CEN 002]. The second main source of supply would be through office to residential conversions that would typically come forward through the prior notification process as permitted development. The scope for such development has previously been identified in Document ECON 002 and has been demonstrated by a stream of prior notification applications. The residual 50 dwellings on unidentified sites in the town centre would be removed from the Broad Location and added to the windfall allowance.

The H2(1) Town Centre Broad Location should be amended to increase the amount of housing to 940 dwellings from the 700 proposed in the submitted Local Plan and to focus on the 2 areas of The Mall and the Riverside Quarter within which redevelopment is expected to deliver additional housing together with an allowance for office to residential conversions elsewhere in the town centre. 50 units should be added to the Borough wide windfall allowance in respect of other development on unidentified sites in the town centre that was previously part of the Broad Location allowance.

H2(2) Invicta Park Barracks Broad Location

73. The second Broad Location identified for housing development in the submitted Local Plan is the Invicta Park Barracks site which at present remains in operational use. At the date of submission it remained uncertain whether the Invicta Barracks site would become available for development within the plan period. However the Ministry of Defence has since announced that the Barracks are to close in 2027. This is a brownfield site in a sustainable location. However it is improbable that all 1,300 dwellings proposed on the site could then be delivered before the end of the plan period. A more realistic figure would be 500 dwellings.

The H2(2) Invicta Park Barracks Broad Location should be amended as only 500 of the anticipated 1300 dwellings are likely to be delivered within the Local Plan period.

H2(3) Lenham Broad Location and Allocations

74. The submitted Local Plan proposed Lenham as a Broad Location to deliver 1,500 dwellings between 2026 and the end of the plan period in 2031. Lenham is unusually well provided with services and facilities including shops, a secondary school, a railway station and direct access to the A20. It is also in a housing market area which overlaps with that of Ashford. Nevertheless development on that scale would represent a very substantial increase in size for the village, the railway service is inferior to that on other lines, and the village is relatively distant from both Maidstone and Ashford. It would thus be improbable that housing could be delivered at the rate of 300 per annum implied by the policy.
75. There is no reason to delay delivery until 2026 (as proposed in the submitted Local Plan). However, as there is an available supply of planning permissions and proposed allocations in both Lenham and nearby Harrietsham, neither is it necessary or appropriate to bring development forward sooner than 2021, particularly as there are expected to be infrastructure constraints to be addressed including sewerage and waste water treatment capacity and the need for a new primary school.
76. The Council has agreed that 2 existing permissions for sites granted on appeal at Ham Lane and the Old Goods Yard should be deducted from the Broad Location figure. That would leave a need to identify sites for 1,350 dwellings. However I consider that it would remain unrealistic in this village location to deliver 135 dwellings each year for 10 years. I therefore consider that the Broad Location should be further reduced to 1,000 dwellings, equivalent to 100 dwellings per annum between 2021 and 2031.
77. There is controversy over where development should be located around Lenham and especially what effect housing development at Lenham would have on the Kent Downs AONB which borders parts of the village to the north. If development is to come forward after 2021 that would allow that the Lenham Neighbourhood Plan can determine what sites should be

allocated. In particular it can examine the scope for development south of the railway which the Borough Council no longer opposes in principle. To that end the Borough Council has agreed to delete an inset map from the submitted Local plan that suggested the Broad Location development would be both east and west of the village and not to the south. In any event that map does not accord with statute and national policy provisions relating to how proposals are to be shown on the Policies Map and Key Diagram. The Borough Council proposes instead to amend the Key Diagram to indicate that the village would be a Broad Location but without further identifying where land would be developed. The above reduction in total numbers would also create more flexibility for the allocation of sites. Should the Neighbourhood Plan not succeed in identifying suitable site allocations then it would fall to a review of the Local Plan to do so.

78. Landscape capacity assessments have recommended that sites around Lenham and especially to the east have a low capacity for housing development. However such an assessment by its nature can only consider landscape character impacts within the identified areas and not the many other considerations that need to be weighed in the planning balance.
79. The Countryside and Rights of Way Act requires that due regard be had to the purposes of the AONB designation when considering development that may affect an AONB. That would include relevant development within the setting of the AONB as Lenham is. However it does not constitute an overriding duty to conserve or enhance all views to and from the AONB without regard to other considerations.
80. Evidence at the examination was that the main concern relates to views to and from the scarp and the Pilgrims Way long distance footpath which passes close to a memorial cross on the hillside. The outward views from here already include the built up area of Lenham, where not screened by trees, and especially the prominent industrial estate to the east of the village. There are also wide and distant views beyond the village as well as across the open foreground within the AONB which would be retained.
81. In that context the identified low landscape capacity east of Lenham means that more housing development can be expected to result in some change to landscape character adjacent to the village and some adverse effect on outward views from the AONB - albeit mitigated by the design and landscaping of the development. Some views towards the AONB and towards the memorial cross may also be affected. However views are

already restricted in places by buildings and vegetation and important viewpoints can be protected in the design and layout of schemes. Neither does the ability to see development from within the AONB necessarily harm the purposes of the AONB.

82. Whereas the final siting of the Broad Location development would be a matter for the Neighbourhood Plan, or by default a Local Plan Review, the submitted Local Plan also includes proposed housing allocations at H1(42) Tanyard Farm and H1(43) Glebe Gardens.
83. The small H1(43) site is already the subject of planning permission and does not require further consideration here.
84. The H1(42) site is separated from the AONB only by the A20 road and it straddles a right of way that leads from Old Ashford Road up to the memorial cross and the Pilgrims Way and from which long views are available. Parts of the site have also been affected by ground water and surface water flows during periods of high rainfall. Whilst the H1(42) site would be visible from the AONB, just as the adjacent industrial estate is already visible, there is scope for mitigation in the design and landscaping of the development to soften the edge of the built development. The site is sufficiently distant from the Pilgrims Way and set at a lower level such that its impact on the wider available views would be limited. Views towards the AONB and the memorial cross would continue to be available from the right of way that leads through the site and development can be set back from this route to allow broader views. Whilst there would remain some residual effects on views to and from the AONB I consider that these would be outweighed by the benefits of early provision of needed market and affordable housing in a sustainable settlement. The ground water and surface water issues would require detailed assessment through the development management process but there is likely to be a suitable engineering solution.

The H2(3) Lenham Broad Location should be reduced from 1500 to 1000 dwellings to be delivered between 2021 and 2031. That would be a more realistic delivery rate. The reduced total development within the Plan period would also allow more flexibility for its location. The allocations would be determined by a Neighbourhood Plan or, by default, in a Local Plan review before April 2021. The plans would need to address any infrastructure constraints. An additional 150 dwellings which would have been part of the Broad

Location will now come forward before 2021 as commitments following appeal decisions at Ham Lane and the Old Goods Yard.

The H1(42) Tanyard Farm allocation should also be retained in the Local Plan to support housing delivery before 2021.

Other Rural Service Centres

85. Lenham is one of 5 Rural Service centres identified in the submitted Local Plan as second tier locations for growth. Harrietsham is close to Lenham and shares some of its characteristics.
86. Headcorn, Staplehurst and Marden all lie on the same railway line south of Maidstone with particularly good rail connections to west Kent and London that would make them attractive for those migrating from those areas (including commuters and retirees) and offset their relatively weaker road links. There are also some local employment opportunities.

The rural service centres are appropriately identified as second tier settlements for development.

Large Villages

87. The third tier settlements are the large villages of Coxheath, Sutton Valence Yalding, Boughton Monchelsea and Eythorne Street (Hollingbourne).
88. Coxheath has a wide range of services and shares many characteristics with the Rural Service Centres. Whilst it lacks a railway station it is close to Maidstone.
89. Sutton Valence and Yalding have fewer services and are more constrained by heritage, landscape and (at Yalding) floodrisk.
90. The main mixed development proposed at the Syngenta site at Yalding would make use of a brownfield site and is much closer to the railway station than the main village. However its allocation would not be sound as the housing development needed to make the development viable would conflict with the floodrisk and there is a lack of evidence that the risk could be adequately mitigated without worsening flood risk elsewhere in an area that has experienced severe local flooding and where the Environment Agency has

been unable to devise the means to prevent repeated flooding. The allocation should be deleted as it would not be effective in delivering the allocated development but to make best use of this derelict site it should be replaced by a policy that positively seeks alternative uses that would be compatible with the site's Zone 3a flood status.

91. Only one other housing allocation is proposed at either Sutton Valence or Yalding. These should be retained to provide the limited housing growth identified for these villages. The Sutton Valence allocation already has planning permission. In each case there is the opportunity for an emerging neighbourhood plan to identify the additional smaller sites which the parish councils have indicated that they would prefer. However once the Local Plan is in place with an identified housing supply these and other villages will be in a stronger position to resist unallocated development outside the settlement boundaries except where it would accord with other Local Plan policies such as that to provide affordable housing to meet local needs.
92. Traffic issues relating to Boughton Lane affect some of the Boughton Monchelsea allocations and are addressed above.

The large villages are appropriately identified and the amount of development is suitably related to the existing services and facilities which they possess. However due to floodrisk the RMX1(4) Syngenta site at Yalding should be deleted as an allocation for housing or specified employment use. The H1(53) Boughton Lane housing allocation at Boughton Monchelsea should also be deleted for traffic impact reasons.

Windfall

93. The Borough Council has provided suitable evidence to support its estimate of the contribution to housing supply of windfall development on brownfield sites. It has reasonably excluded a windfall allowance for the early years of the plan as this would risk double counting with existing commitments. It has also reasonably concluded that the number of anticipated windfalls should be reduced in the middle years of the plan period as many sites have already been identified through the SHEDLAA and allocation processes. Whilst a higher annual windfall figure is indicated for the final 5 years of the plan period, that would need to be similarly adjusted in a plan review as further sites are identified and allocated.

The windfall allowance as amended has been adequately justified.

The Housing Trajectory and the 5 year Housing land Supply

94. The revised housing need figure of 17,660 dwellings over the plan period would equate to 883 dwellings each year on average. As delivery in the first 5 years of the plan from 2011 to 2016 was at a lower rate there is an existing shortfall which needs to be made up. The national Planning Practice Guidance advises that, where possible, this backlog should be made up in the first 5 years of the plan period (also known as the Sedgefield Method). The trajectory seeks to reflect this.
95. The trajectory also takes account of the 5% buffer sought by paragraph 47 of the National Planning Policy Framework whereby supply is brought forward from later in the plan period. Some have argued for the application of a higher 20% buffer on the basis of alleged persistent under delivery of housing in the past. I disagree. Past delivery overall has exceeded the previous housing targets set out in the South East Plan and it would be unreasonable to apply higher housing need figures retrospectively that were only identified as recently as 2014.
96. Nevertheless, the combination of: a much higher housing need figure than the previous housing target; the Sedgefield method of addressing the backlog; and the 5% buffer together lead to a trajectory which oscillates from a low rate of delivery against currently assessed needs to a very high and possibly unachievable rate in the early years of the remaining plan period before reverting to a low rate. The latter low rate is exacerbated by a heavy and unrealistic reliance on high rates of delivery from 2 Broad Location sites. There is also some evidence of likely slippage in the delivery of some allocated sites early in the plan period.
97. There is a strong case for seeking a smoother and more realistic rate of delivery over the plan period. That would also provide more regular local employment in construction to accompany the uplift in housing provision. Such a smoothing of the trajectory would be most readily achieved by addressing the existing backlog over a 10 year period from April 2016 rather than over 5 years as currently proposed. However additional allocations on a greater variety of sites in the latter part of the plan period through the first plan review would also boost delivery then and especially in the final 5 years, avoiding overall under-provision against the assessed needs across the plan

period. If sufficient sites cannot be identified then the matter would need to be pursued through the duty to cooperate.

98. The recommended smoothing of the trajectory should strengthen the 5 year supply position as at 1 April 2016. That many additional planning permissions have been granted since that date indicates that the 5 year supply should also be strong at 1 April 2017 and in subsequent years.

If the suggested changes to the allocations and broad locations are carried forward as main modification the housing trajectory would need to be amended pending any new allocations at the first review of the Local Plan. Spreading the existing backlog over the 10 years from 2016 to 2026 would allow for a more realistic rate of delivery of the allocations and provide steady employment in the construction industry as a contribution to the identified need for additional employment in the Borough.

Matter 4: Employment

Issue - Whether employment needs and existing supply have been appropriately assessed

99. National Planning Practice Guidance advises that the assessment of economic development needs should relate to the functional economic market area. The Economic Sensitivity Testing and Employment Land forecast 2014 [Document ECON 001] concluded that it is reasonable to define the functional economic area of Maidstone as focussed on the immediately surrounding districts. However whilst that document refers to a selection of plans and proposals in the adjoining targets and some of their targets for jobs and housing growth, it acknowledges that plans and proposals are being revised or finalised and could be subject to change. The Document does not contain any overall assessment of employment needs or provision across the neighbouring districts and does not relate employment growth to planned housing growth across that area in the light of commuting patterns.
100. MBC has issued an Employment and Retail Topic Paper 2016 [Document SUB 003] as supporting evidence for the Local Plan's employment policies. It explains that the Local Plan anticipates the creation of 14,400 jobs by 2031 in accordance with the aims of the *Maidstone Economic Development Strategy (2011-2031)* (EDS) [Document ORD 005]. This figure is derived

from the *Economic Sensitivity Testing and Employment Land Forecast Final Report* (February 2014) [Document ECON 001].

101. The Economic Development Strategy indicates what sectors are relied upon to deliver that jobs growth.

Issue - Whether employment trends are appropriately taken into account when assessing housing needs.

Issue – What are the implications of the housing and employment targets for cross-border commuting patterns

102. The Economic Development Strategy acknowledges that Maidstone Borough has moved from being a slight net importer of labour to a net exporter. Information provided to the examination on commuting patterns in the 2011 census indicates that the net daily outward flow from Maidstone to London is 5,834 and that there is a net daily inflow to Maidstone from other mid and west Kent authority areas of 3,844 persons. The strongest net daily flows include 2,008 persons from Maidstone to Tonbridge and Malling and 3,413 persons from Medway to Maidstone.

103. Table 33 of the *Strategic Housing Market Assessment* [Document HOU 002] acknowledges that employment growth in Maidstone could partly support housing demand in the Medway Towns, Tonbridge and Malling, Tunbridge Wells, Maidstone and Swale. It might have also referred to Ashford from which there is also a significant net daily inflow of commuters.

104. Table 33 sets out what was then known about Housing and Employment Growth policies in the nearby authorities (including Ashford). However 3 of the 6 authorities then had no employment growth target and the only recent targets for the period ending in 2031 were then in the Swale Draft Local Plan of 2013. The Swale housing target has since been increased. Some updated information was provided in the Borough Council's written statement for Session 8.

105. In the examination hearings attention has been drawn to how the Maidstone housing target may relate to the employment target. It has been pointed out that the 14,400 jobs target is acknowledged as ambitious and yet at a current estimated employment rate of 1.3 jobs per household it may fall short of the numbers of employed persons that might be accommodated by the new dwellings proposed in the Local Plan.

106. Relevant factors could include changes in average household size including more single person households, and an increase in the proportion of retired persons and households no longer participating in the labour market. These trends would affect existing as well as new households.

107. What remains unclear is what impact cross-border commuting between Maidstone and neighbouring areas (and London) would have on job provision.

108. There is evidence that where the adjoining authorities have assessed their employment needs they consider that they can meet their needs within their own areas and in most cases are proposing new employment allocations to that end. However there are apparent disparities between the authorities concerning the number of jobs and the amount of employment land that is being proposed relative to the intended growth in housing in each area. It is also unclear how each authority is taking account of the effect of net cross-border commuting flows. Where flows are currently in equilibrium and likely to remain so this may not matter. However where an authority is planning for particularly high or low rates of job growth relative to the anticipated change in population or housing this could result in sharp changes in commuting patterns.

It is necessary to establish both whether there is likely to be sufficient land overall to accommodate the employment needs and also what effect there may be on travel patterns, including net flows to London or elsewhere.

An assessment is therefore needed which updates the position on job targets and employment land provision in Maidstone and the adjoining Boroughs/Districts within the same economic area relative to the anticipated housing and population growth in those areas.

Issue – Whether the employment allocations are justified and consistent with national policy and whether they would be effective in terms of deliverability

109. Only part of the growth in employment would be in B class business floorspace amounting to 3,732 jobs with a further 4,200 jobs at the medical

campus being developed at Junction 7. The Employment and Retail Topic Paper [Document SUB 003] and Proposed Change PC/2 corrected the employment floorspace requirements set out in the submitted Local Plan at Table 4.4 and identified a need for 24,000sqm of B1a office floorspace, 6,500sqm of warehouse floorspace and -15,600sqm of industrial floorspace.

- 110.EMP1(5) Woodcut Farm is identified as a strategic site that is critical to address a qualitative and quantitative need for high quality business space, notwithstanding that it is acknowledged that it would have adverse landscape impacts and that one scheme for the site has been refused planning permission mainly on landscape grounds.
- 111.The Employment and Retail Topic Paper suggested that the identified need for 24,000sqm of office floorspace would be met with 16,000sqm at Woodcut Farm and 8,000sqm at Mote Road in Maidstone Town Centre. However there are evident viability issues with both sites such that neither site is now expected by the Council to deliver this much space. Provision may be as little as half the figure of 24,000sqm. The suggested identification of 3,000sqm of office floorspace at Maidstone East would only partially make up the anticipated shortfall.
- 112.The Syngenta site at Yalding has been identified for 8,640sqm of business space. However floodrisk issues and the necessary deletion of a housing allocation that would have assisted development viability also mean that site is unlikely to be delivered in that form.

Unless alternative provision is identified there is likely to be a shortfall in the delivery of office floorspace against the identified requirement. Alternative provision may involve mixing development with more lucrative land uses in the town centre.

In the town centre, reduced on-site parking requirements could improve viability where alternative parking and public transport are available.

Consideration should be given to safeguarding part of Woodcut Farm or other sites suitable for office development from other uses for a

period pending a recovery of office development values later in the plan period.

Matter 5: Transport and Air Quality

Issue: Whether the Local Plan is consistent with national policy in relation to air quality impacts.

113.Paragraph 110 of the National Planning Policy Framework provides amongst other things that in preparing to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment.

114.An issue that has come to the fore during the Examination is that of air quality, especially in relation to road traffic emissions and their associated health impacts. This follows the intended quashing by the High Court of the National Air Quality Plan (AQP) and the direction that the Government should urgently replace it with a new plan by July 2017.

115.Maidstone town is designated as an Air Quality Management Area on the basis that air quality targets for Nitrogen Oxide emissions exceed limits set by an EU Directive and national regulations at a series of locations within the town. These locations include The Wheatsheaf junction and also Upper Stone Street which is part of the town centre gyratory and carries traffic towards the A274, A229(S), A20(E) and B2010.

116.An Air Quality Action Plan adopted for Maidstone in 2010 is referred to in the national AQP but has not yet succeeded in bringing emissions within the limits.

117.Whilst some have argued that the air quality issue warrants a moratorium on new development in the town, that would not solve the existing problem and would not be consistent with national policy. A solution is needed that both addresses the existing air quality problem and allows that the needs for housing and other development can still be met whilst minimising pollution.

118.The amount of emissions from road vehicles is affected by the number of vehicles and also by the means of propulsion. The number of vehicles is unusually high in Maidstone because of high levels of car use relative to

other modes such as public transport, walking and cycling. The proportion of diesel vehicles has also grown in recent years and is likely to have arrested what was previously a downward trend in emissions. A switch away from older diesel vehicles towards electric vehicles as range improves and costs reduce and might help. Heavy diesel vehicles such as lorries and buses also make a significant contribution to emissions although the introduction of low emission vehicles can achieve reductions. Moreover one bus can carry as many people as a large number of cars, resulting in less emissions overall. This further supports the need for a bus lane on Sutton Road to encourage modal shift in south east Maidstone, including by existing residents.

119. Even where they are physically possible, road capacity improvements may reduce congestion and pollution from stationary traffic but can also encourage more vehicle movements with their associated emissions.

120. The need to reduce emissions supports the aims of the Borough Council's Integrated Transport Strategy and the Walking and Cycling Strategy to encourage modal shift.

121. Additional measures are likely to be needed including the designation of low emission zones or clean air zones, additional bus priority, replacing or retrofitting existing buses to reduce emissions, encouraging the use of electric cars and electric bicycles by requiring charging places and storage provision at homes, and reviews of the amount of parking provision in the town centre and its costs relative to other travel modes, especially bus travel. The commitment in the Integrated Transport Strategy to increase long stay parking costs 50% by 2031 lacks sufficient urgency and is unlikely to prompt the necessary early shift to other transport modes that is needed to reduce congestion and improve air quality, particularly if bus and train fares rise at a similar or greater rate.

122. Park and Ride (or Park and Train) may also be part of the solution if it results in fewer vehicles entering the town centre and would be of most benefit to those travelling from locations outside Maidstone with poor public transport connections. However careful siting and pricing policies are needed if park and ride sites are not to encourage passenger transfer from service buses to cheaper park and ride services that depend on subsidy, especially if this would harm the frequency or viability of service buses.

123. That significant modal shift is possible is demonstrated by other towns in the south including Brighton, Poole and Oxford. Concentrating development in or adjacent to the town on high frequency bus routes and in those rural service centres with railway services as proposed in the Local Plan makes modal shift more likely to be achieved than if development were to be more dispersed or located in new settlements with fewer facilities or public transport services and which still relied heavily on access to Maidstone town by car for employment, services and facilities.

124. A land use plan like the Local Plan can only partially address the air quality issues. Other available measures include the emerging Low Emissions Strategy, the intended review of the Maidstone Air Quality Action Plan, and a review of the parking strategy. The national Air Quality Plan may propose other specific measures for local implementation.

The need to address poor air quality within the Air Quality Management Area and especially at the exceedance locations would not justify a moratorium on development although it does emphasise the need for mitigation measures for individual developments. To achieve satisfactory air quality is likely to require a range of measures to address the existing problem whilst also allowing for necessary growth.

Issue - Whether the Local Plan is consistent with national policy for the avoidance of severe traffic impacts on the strategic road network resulting from development and is it supported by proportionate evidence

125. Further modelling work has been undertaken during the examination to test the cumulative impacts of planned development in Maidstone and adjoining Boroughs on the strategic road network.

126. A Statement of Common Ground [Document ED 103] has been agreed between Highways England and Maidstone Borough Council which concludes in summary that proposed junction improvements at M20 junctions 5-8 can adequately mitigate development but that timely implementation and continued monitoring are necessary as well as the possibility of Plan B mitigation if the planning permissions that would provide mitigation are not implemented in a timely fashion. Changes to the Policies DM24 and ID1 are recommended in the Statement including the use of Section 278 agreements under the Highways Act 1980. Subject to these changes Highways England is content that its objections have been addressed.

Severe traffic impacts on the strategic network are capable of avoidance through mitigation.

Matter 6: Monitoring and Plan Review

127. During the examination, consideration has been given to when the Local Plan should be first reviewed and whether the timing of such a review should be adjusted to address particular issues that have arisen.

128. A commitment to an early plan review has been used elsewhere to deal with identified shortcomings in plans and to allow them to proceed to adoption. Advice by the Planning Advisory service in *'Early Reviews' and Local Plans* suggests that they should not be used to resolve matters critical to the Plan's strategy and that they are not a panacea for addressing the difficult issues.

129. In this case there are some issues which do need to be resolved before the plan is first adopted. However there are others, especially in relation to housing delivery at the end of the Local Plan period. These are less urgent because they do not impact on strategy in the first 5 years of the Local Plan. To delay the adoption of the Local Plan to resolve all of these matters would have other disbenefits including prolonged uncertainty about the 5 year housing supply position later in the plan period.

130. The submitted Local Plan indicated at paragraph 17.126 that a first review of the Local Plan *'will commence in 2022'*. A change proposed by the Borough Council (PC/59) would amend this to *'will commence by 2022.'* However there is no commitment to how quickly such a review would progress and no timetable for the necessary work. Moreover that would be too late to address the need to identify specific development site allocations in the Broad Locations (including any need to address a failure of the Lenham Neighbourhood Plan to make such allocations). A review would also be needed in association with any decision by Kent County Council to go ahead with the Leeds-Langley Relief Road. Additional allocations will also be needed for the latter part of the plan period to supplement supply from the Broad Locations in order to provide necessary choice and to offset a reduced rate of delivery from those sites.

The Local Plan should include a policy commitment to a review with a target adoption date by April 2021. That review process would accordingly need to start much earlier. The plan could then be rolled forward by 5 years from 2031 to 2036.

Robert Mellor

INSPECTOR

Inspector's Interim Findings – additional employment matters

The Council has prepared this further briefing note in response to the employment matters raised in the Inspector's Interim Findings (22 December 2016).

1 –WIDER EMPLOYMENT NEEDS/PROVISION

Interim Findings

- 1.1 In the interim findings, the Inspector made the following request;

It is necessary to establish both whether there is likely to be sufficient land overall to accommodate the employment needs and also what effect there may be on travel patterns, including net flows to London or elsewhere.

An assessment is therefore needed which updates the position on job targets and employment land provision in Maidstone and the adjoining boroughs/districts within the same economic area relative to the anticipated housing and population growth in these areas. (paragraph 108)

Council's response

- 1.2 In response, the Council commissioned its economic consultants, GVA, to undertake an additional piece of analysis covering with the following matters;
- Understand the commuting assumptions used in the most up to date economic forecasting evidence published by Maidstone and its 5 neighbouring authorities
 - Analyse the relationship between population growth, workforce growth, jobs growth and in/out commuting levels across the area covered by Maidstone and its immediate neighbours
 - Conclude on the implications for employment land supply and overall commuting patterns across the area
- 1.3 GVA has prepared a briefing paper setting out its methodology, analysis and conclusions. This is included as Appendix A. The key findings are summarised in the following paragraphs.
- 1.4 The economic forecasts being used by Maidstone and its neighbours exhibit some variation in terms of the timing of their preparation and the brand of forecasting model used. Maidstone's strongest commuting relationships (excluding London) are with Tonbridge & Malling and Medway. These three authorities have used Experian forecasts in their evidence which indicates that economic relationship assumptions across these 3 areas are likely to be consistent.
- 1.5 Also, and importantly, commuting patterns from the census (be it 2001 or 2011) are an input to the models used by all the neighbouring authorities. This provides some overall consistency in terms of the baseline for how commuters' origins and destinations have been

accounted for across the wider area. The economic models do not, however, predict the exact destination of future out-commuters.

- 1.6 Further, from the analysis undertaken, it appears that none of Maidstone's neighbours are using an economic scenario for their plan making process which explicitly seeks to increase or decrease commuting rates as a policy objective (a so-called 'policy on' approach). This confirms that none of the authorities are actively following a policy to alter commuting patterns which could have reciprocal impacts on other authority areas.
- 1.7 The table on page 7 of GVA's note presents a summary of the workforce-jobs-commuting balance for Maidstone and its neighbours. The aim is to provide a strategic overview of how individual authorities' proposals may affect this balance in the future. The table uses the commuting patterns from the 2011 census to help provide some consistent basis.
- Column A – OAN
 - Column B – total population growth
 - Column C – increase in workforce as a result of population growth (population-led)
 - Column D – increase in the number of jobs based on the capacity of the economy (economy-led)
 - Column E – number of out-commuters (2011 census)
 - Column F – proportion of people living and working in the same LPA (2011 census)
 - Column G – proportion of jobs in the LPA taken by people living in the same LPA (2011 census)
 - Column H – number of additional jobs needed if the increase in workforce as a result of population growth (column C) were to live and work in the same borough in the same proportion as was evident in the 2011 census (column F)
 - Column I – number of new jobs in the LPA (column D) which will be taken by people not living in the borough if the proportion of jobs taken by non-residents stays the same as was evident in the 2011 census (100%-column G)
 - Column J – number of new jobs in the LPA which will be taken by people living in the borough if the proportion stays the same as was evident in the 2011 census (D x G)
 - Column K – the workforce surplus/deficit (H – J)
- 1.8 The final column (K) shows that for Maidstone there will be 1,306 additional workers than jobs available in the borough, assuming 2011 commuting patterns. Tonbridge & Malling has a similar scale of 'surplus' workers. Whilst there is a complexity of factors which influence the balance between workers and jobs (such as economic activity rates, unemployment levels), in simple terms these workers could need to commute out of their resident borough for work, and for Maidstone this would represent an increase in out-commuting of

approximately 4% (K as a proportion of E). On the other hand, Medway, Swale, Tunbridge Wells and Ashford all show more jobs than workers in this analysis. When the jobs-workforce balance for the 6 authorities is looked at as a whole, this shows that an overall 'surplus' of just 1,724 workers across the 'sub region' could result from the combined authorities' plan proposals/emerging evidence bases. The scale of the potential increase in out-commuting from the sub region as a whole would be just 0.9% of the 2011 position (1,724 as a proportion of 195,674).

- 1.9 This is a highly marginal change both in absolute and proportionate terms. Also, the role that London plays as a highly significant source of employment for local workers cannot be discounted from this assessment and it can be expected that commuting to London will increase, as workers continue to capitalise on the good public transport links. The briefing paper highlights that for Maidstone the proportion of out-commuting to London increased from 10% of trips in 2001 to 20% in 2011. A further increase should therefore be expected as a continuation of this trend.
- 1.10 The briefing paper also provides an update of neighbouring authorities' B class land supply position relative to needs. The emerging Plans produced by Ashford, Medway, Swale and Maidstone indicate sufficient supply to meet their quantitative needs and all indicate a degree of over-supply to provide flexibility and choice. For Maidstone, Swale and Medway, additional allocations are stated to be needed to address qualitative issues. Tonbridge and Malling and Tunbridge Wells are at an earlier stage in the Plan making process and have not yet affirmed how much additional land will be allocated. For Tonbridge & Malling the evidence indicates between 3 and 33ha additional land is needed depending on the economic scenario to be followed. Tunbridge Wells' evidence identifies a need for some 12.3ha of additional employment land.
- 1.11 Where positions have been confirmed, Maidstone and its adjoining authorities are allocating sufficient B class land to meet identified needs.
- 1.12 Overall, the analysis indicates that there will be sufficient land overall to accommodate employment needs in the wider area. The assessment of the relationship between population growth, workforce growth, jobs growth and in/out commuting levels across the wider area does not indicate any significant to change to the overall commuting balance.

2 – OFFICE FLOORSPACE

Interim Findings

- 2.1 In the interim findings the Inspector made the following request;

Unless alternative provision is identified there is likely to be a shortfall in the delivery of office floorspace against the identified requirement. Alternative provision may involve mixing development with more lucrative land uses in the town centre.

In the town centre, reduced on-site parking requirements could improve viability where alternative parking and public transport are available.

Consideration should be given to safeguarding part of Woodcut Farm or other sites suitable for office development from other uses for a period pending a recovery of office development values later in the plan period.

Council's response

Employment Floorspace Requirement (2016-31)

- 2.2 At the Modifications hearing on 1st December, the Inspector requested that Table 4.4 of the submission Local Plan setting out the net employment floorspace requirement be updated to an April 2016 base date. The Council has updated the table to include completions up to 1st April 2016 and the updated table has been included in its schedule of Main Modifications/minor changes:

Update Table 4.4 of the Local Plan to take account of completions¹ to 1st April 2016

	Offices B1a/b (NIA)	Industry B2 (GIA)	Warehousing B8 (GIA)
Gross requirement (2011-31) sqm	39,830	20,290	49,911
Net requirement (2014-31) sqm	24,000	-15,600	6,500
<u>Net requirement (2016-31) sqm</u>	<u>24,600</u>	<u>-18,610</u>	<u>7,965</u>

- 2.3 The updated net requirement for offices and warehousing has increased because losses to other uses have exceeded gains. Conversely more industrial floorspace has been completed than has been lost.

¹ For B1a/b – all completions; For B2/8 – completions of 400sqm and above;

Allocations

2.4 As an outcome of both the hearings and the Interim Findings, changes have been proposed to site allocations which will affect the overall employment land supply position. The changes are as follows;

- Policy EMP1(1) Mote Road - proposed Main Modification to state that the site is allocated for up to 2,000sqm of office floorspace as part of a mixed use development
- Policy EMP1(5) Woodcut Farm – proposed Main Modification to state that the site will deliver, as a minimum, 7,500sqm B1a/b floorspace. A further Main Modification proposes an additional criterion confirming that serviced land to accommodate a minimum of 3,300sqm of floorspace within Use Classes B1(a) and B1(b) will be provided before any units falling within Use Classes B1(c), B2 or B8 are occupied. These proposed changes are agreed with the developer
- Policy RMX1(4) Syngenta – proposed Main Modification to delete the allocation for housing and employment (B class uses)
- Policy RMX1(2) Maidstone East and Royal Mail Sorting Office – revision to the proposed Main Modification to state that the site will deliver 4,000sqm of office floorspace as part of the mixed used development. This is an increase of 500sqm from the 3,500sqm figure put forward at the Modifications Hearing based on further consideration of the capacity of the site in the interim. The revised Main Modification to Policy RMX1(2) is set out below. If agreed, this will need to be incorporated in the finalised schedule of Modifications.

Policy	Proposed change	Main Modification or Minor Change	Reason
Policy RMX1(2) – Maidstone East and Royal Mail Sorting Office and paragraph 13.12	Amend paragraph 13.12 as follows; <u>13.12 Office uses will be an important component of the mix of uses on the site. The site is in a highly sustainable location adjacent to Maidstone East station which will benefit from improved services to London in 2018 and with good access to Junction 6 of M20.</u> Housing is <u>also</u> seen as an important supporting use on this site. Residential development could be delivered in separate blocks either to the west of the site or possibly south of the railway line fronting Brenchley Gardens, or on upper floors above the retail	Main Modification	To ensure consistency with national policy and to ensure the plan is positively prepared to meet identified needs.

	development.		
	<p>Amend Policy RMX1(2) as follows;</p> <p>Maidstone East and former Royal Mail Sorting Office, as shown on the policies map, is allocated for development for up to 10,000m2 comparison and convenience retail, <u>4,000sqm of offices (B1a)</u> and approximately 210 dwellings. In addition to the requirements of policy H1, planning permission will be granted if the following criteria are met.</p> <p>1 The provision of up to 10,000sqm of comparison and convenience shopping floorspace, <u>4,000sqm of offices (B1a)</u> and some 210 dwellings. <u>The submission of a retail impact assessment is required which demonstrates that the National Planning Policy Framework's impact test is met.</u></p>		

- 2.5 These changes are incorporated into the table below which shows the amount of B class floorspace to be delivered on allocated sites in the Local Plan. Two of the allocated sites are in the town centre and will together deliver 6,000sqm of new office floorspace as part of mixed use schemes.

Table 1 - Local Plan allocations providing B class employment floorspace

	Office (B1a/b) sqm	Industrial (B1c/B2) sqm	Warehousing (B8) sqm
EMP1(1) Mote Road (will be a RMX1 policy)	2,000		
EMP1(2) Barradale Farm		5,500	
EMP1(3) Land south of Claygate		6,800	
EMP1(4) Land at Wheelbarrow estate		14,500	
EMP1(5) Woodcut Farm	7,500	41,500	
RMX1(2) Maidstone East	4,000		

TOTAL	13,500	68,300
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Pipeline supply of offices (consents)

- 2.6 There will be additional supply of office floorspace from planning consents granted between 1st April 2014 and 1st April 2016. The Council previously provided an update on the supply of office floorspace from the main sites granted planning permission since 1st April 2014 in its 'Note on office floorspace' (ED 099).
- 2.7 A more comprehensive list of sites with extant consent at 1st April 2016 is set out below:

Table 2 – Sites with consent for B1a at 1st April 2016 (>400sqm)

MA/15/505504	Mandarin Chef, 35-37 Lower Stone Street	660sqm
MA/12/0867	Congelow Farm, Benover Road, Yalding	530sqm
MA/13/2059	Knight Ashphalt, Lenham	730sqm
	Total	1,920sqm

- 2.8 This shows that there is a pipeline supply of some 1,920sqm of additional office floorspace. This is additional to the capacity within the designated Economic Development Areas and the Local Plan allocations.

Supply of B1a/b floorspace from windfall sites

- 2.9 This pipeline supply of consents helps to illustrate that there will be other unidentified sites which will be developed for new offices over the remaining plan period. To date, no allowance for such windfall sites has been included in the Council's assessment of B1a/b supply.
- 2.10 The Council has undertaken an analysis of the amount of B1a and B1b floorspace completed in the 5 years between 2011/12 and 2015/16 on windfall sites. The list of applications is provided in Appendix B. To ensure only genuine windfall sites were included, the following approach was taken;
- Completions on allocated sites and within the designated Economic Development Areas (including ED1/ED2 sites in the adopted Local Plan) have been excluded; and
 - Completions where the office floorspace was ancillary to the primary use of the site/building have been excluded

- 2.11 The findings are included in Appendix B. This shows that in the preceding 5 years there has been a significant level of delivery of office floorspace on unidentified sites totalling 3,776sqm. The Council considers that a 5 year period represents a reasonable historic period from which to derive a trend and, whilst the annual rate of completions has fluctuated year on year, this should be expected as part of a natural economic cycle. On average, 755sqm has been completed per annum.
- 2.12 More than 50% of the completed floorspace is in the town centre. As offices are a specified town centre use, national policy and Local Plan policy (Policy DM17 in the submission Plan) would positively support further such development in the future. The most significant scheme was the conversion of the Maidstone Library building in St Faiths Street to 1,443sqm offices. An example of a similar type of site which could provide additional offices, most likely as part of mixed use proposals, is the empty Maidstone Post Office building on King Street PO Sorting office. This site was identified in the Town Centre Study (CEN 002) as an opportunity site (Figure 6.2, page 82, site 52). The Study concluded that the site would be appropriate for 2,740sqm additional retail (paragraph 11.167) with the opportunity for employment on upper floors (paragraph 11.159).
- 2.13 The schemes contributing to the completed floorspace in the rest of the borough fall into two broad types. Firstly, schemes for the extension of existing business premises in countryside and Policy DM41 (as proposed to be modified) will provide the framework for such proposals in the future. The remaining schemes were on sites within identified settlements where development is, in principal, acceptable.
- 2.14 Based on this trend, the council considers that it is reasonable to make an allowance for future supply on 'windfall' sites which will contribute to the forecast demand. To not make such an allowance would fail to take proper account of a source of future supply. As the sites which have come forward as windfalls are different in terms of nature and scale to the allocations for B1a/b space made in the Plan, the Council does not consider that the inclusion of the allocations in the Local Plan will alter the future incidence windfall sites to any significant degree.
- 2.15 In common with the approach taken to housing windfalls, no allowance is proposed for the first 3 years (2016/17 to 2018/19). For the twelve year period 2019/20 to 2030/31 an allowance of 750sqm/annum equates to some 9,000sqm of B1a floorspace to include in the overall employment land supply. The extant consents listed in Table 2 (which are all 'windfall' sites) help to further underline that this rate of supply is likely to continue in the future.
- 2.16 The revised Monitoring section of the Local Plan includes a monitoring indicator to measure the amount of B class floorspace delivered annually (indicator M18). This data will be used to assess delivery of office floorspace on windfall sites in comparison with the allowance to confirm that this level of supply is being achieved.

B1a/b Land Supply

- 2.17 Taking account of the sources of supply identified in the preceding sections, the supply position is as follows

Table 3 – B1a/b sources of supply

Requirement 2016-31 (sqm)	24,600
Supply (sqm):	
Allocations	13,500
Consents @ 1 st April 2016	1,920
Windfall allowance (B1a)	9,000
Total	24,420
shortfall	-180

- 2.18 This shows a small shortfall of some 180sqm against forecast needs by the end of the Plan period. Overall this is de minimus and can be expected to be bridged given that the Local Plan has some 15 years to run. Indeed, since 1st April 2016, consent has been granted for a scheme a Turkey Court, Maidstone² (MA/16/502359) which would deliver an additional 816sqm B1a over and above that already assumed for this site in the Council's evidence base (ECON 002). Implementation of this consent alone would overcome the numerical shortfall identified.
- 2.19 There is therefore a sufficient supply of land for B1a/b uses through allocations and consents in conjunction with a justified allowance for future windfalls to meet the evidenced need for the full Plan period to 2031.

Local Plan Review

- 2.20 In response to the discussion at the hearings and the Interim Findings, the Council is proposing a Main Modification committing it to a first Local Plan Review with a target adoption date of April 2021. The proposed wording of the Review Policy LPR1 and the supporting text confirms that employment land provision (supply) and needs is one of the matters which the Review may need to address.
- 2.21 The updated Local Plan monitoring indicators which have been proposed provide a much more comprehensive framework for how the Council will monitor employment land supply (indicators M18-M21). If overall delivery is falling short of identified requirements, the monitoring framework underlines that the Council will need to consider changes to the employment land strategy as part of a Local Plan review.
- 2.22 The employment forecast that forms part of the Plan's evidence base provides an assessment of needs for the full Plan period to 2031 (ECON 001). Inevitably the confidence

² Site is within a EDA so no double counting with the windfall allowance

level of such economic projections reduces over time. Whilst there can be a higher level of certainty over the level of need in the earlier phases of the Local Plan, over the longer term performance needs to be monitored and updated to refine the understanding of need in the future. This is a further argument to review demand and supply as part of the first Local Plan Review.

- 2.23 The document ED 099 sets out how the need for additional office floorspace (B1a/b) is phased in the Council's economic forecast (ECON 001). The table reproduced below shows the cumulative requirement in 5 year phases to the end of the Plan period.

Table 4 – Office (B1a/b) need in 5 year phases (cumulative)

	2014-16	2016-2021	2021-26	2026-31
B1a/b Cumulative requirement (sqm)	-235	8,094	16,602	24,000

- 2.24 Reading the supply position in Table 3 in conjunction with the phasing of needs in Table 4 reveals that there is sufficient supply on identified sites alone (allocations and consents) to meet needs up to the start of the 2025/26 monitoring year. This before any account is taken of the supply from windfall sites which the Council considers will form part of a sustained supply of office space over the Plan period. Also, the relative lack of current market interest in larger scale new office development suggests demand may actually be deferred more towards the end of the Plan period than the forecast suggests whilst the office market continues to go through a period of rebalancing with the loss of the poorer quality stock.
- 2.25 As part of the Local Plan Review, the Council will re-assess both the need (demand) for employment floorspace and the supply, including whether additional allocations or alterations to existing allocations are required.
- 2.26 Policy RMX1(1) allocates the Newnham Park site specifically for a medical campus of up to 100,000sqm. Criterion 1 of the policy specifies that 25,000sqm of this will be for associated offices and research and development. The site was granted outline consent for 98,000sqm of floorspace in April 2014 with the consent conditioned to state that the occupation of the office buildings shall be limited to those occupiers directly related to the provision of medical services (MA/13/1163). None of this consented floorspace currently counts as supply towards the general requirement for additional office floorspace. There is a current application to renew the outline consent (MA/16/507292).
- 2.27 The Council considers that the Local Plan Review would be a timely point at which to review progress with the delivery of the medical campus. At this point it would be 5-6 years since outline consent was first granted and it would be an appropriate point to consider, in the round, if any adjustments to the policy framework for the site are justified. This could include assessing the prospects of the full 25,000sqm being developed out for medical

related offices or whether an element could go towards meeting more general office needs. Relevant to this assessment would be both an updated forecast of office needs for the borough and a fuller understanding of the demand for the medical specific office floorspace.

- 2.28 The allocation is for up to 100,000sqm of floorspace of which 98,000sqm has extant consent. There is a further area of land within the RMX1(1) allocation which is allocated for medical and associated uses which does not form part of the currently consented scheme. This area of land which is shown in the Plan in Appendix C lies between the shopping village and the new access road into the site and extends to some 3ha.
- 2.29 The medical campus as currently envisaged does not require this area of land. This additional area has the potential to accommodate additional general needs B1a/b floorspace. As part of the Local Plan Review, the allocation of this area should also be reviewed to determine if it should be identified for general office needs. Indicatively, the site is large enough to provide up to 15,000sqm of offices.
- 2.30 The Council is proposing a Main Modification to the Plan to signal the potential of the Newnham Park site to accommodate additional general needs B1a/b floorspace and for this to be further assessed as part of the first Local Plan Review.

Policy	Proposed change	Main Modification or Minor Change	Reason
RMX1(1)	<p>Add an additional paragraph after paragraph 13.9 as follows;</p> <p><i><u>13.x As the medical campus is a specific allocation for a specialist type of use, the first Local Plan Review will be a timely point at which to review progress with the delivery of the campus and to consider whether any adjustments to the policy framework for this site are justified. Specifically the Council will assess the site's suitability for an element of non-medical B1a/b uses which could be additional to, or a partial alternative to, the floorspace allocated in Policy RMX1(1). Factors which will inform this review will be progress with, and the prospects for, the implementation of medical-related office development on this site and an updated assessment of the need for additional B1a/b class employment floorspace in the borough to the end of the Plan period.</u></i></p>	Main Modification	To ensure the plan is positively prepared to meet identified needs.

	<p>Add an additional section to the end of Policy RMX1(1) to read;</p> <p><u>Through the first Local Plan Review the Council will assess the site's suitability for an element of non-medical related B1a/b uses. Factors which will inform this assessment will be progress with, and prospects for, the implementation of medical-related office development on the site and an updated assessment of the need for additional B1a/b floorspace in the borough to the end of the Plan period.</u></p>		
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Maidstone Borough Local Plan Examination

Additional Analysis in Response to Inspector's Interim Findings: Matter 4 Employment

- 1.1 This note provides additional analysis relating to the discussion of Employment Matters in the Inspector's Interim Findings from the Examination of the Maidstone Borough Local Plan.
- 1.2 This focuses on the following key points raised in the Inspector's Interim Findings:
- Updating the position on job targets and employment land provision in Maidstone and adjoining local authorities in relation to projected housing and employment growth
 - Considering the impact of cross-border commuting between Maidstone, neighbouring areas and London on job provision
- 1.3 It is worth noting that throughout the preparation of the Maidstone Borough Local Plan the Council has continued to engage with its neighbours on all matters, including the need for and provision of employment land. At no point have any of the neighbouring authorities raised any challenges or issues relating to the approach to employment matters proposed by Maidstone Borough Council.
- 1.4 In preparing its Local Plan and evidence base Maidstone Borough Council has taken into account the plans (at whatever stage they were at) of its neighbours. In preparation for the Local Plan Examination Maidstone Borough Council has undertaken further engagement with its neighbours to confirm its plan does not create issues with its neighbours. Through this process all neighbouring authorities have confirmed to the Council that they have no unmet employment land needs which they require Maidstone's Local Plan to address.
- 1.5 This further note has been prepared to assist the Inspector's understanding of the 'sub-regional' housing and employment context. In line with the existing evidence base this note considers the functional economic area within which Maidstone sits, encompassing the following local authority areas:
- Medway;
 - Tonbridge and Malling
 - Swale;
 - Ashford; and
 - Tunbridge Wells
- 1.6 It is clearly not appropriate for Maidstone Borough Council to 're-assess' the demand and supply for each local authority. Therefore this note provides a further review of the published evidence and policy direction for each district. It then considers the relationship between forecast population and

jobs growth in the sub-region and compares this at a strategic level with current in and out commuting rates.

- 1.7 By undertaking this analysis we have developed a high level understanding of the potential future impacts of housing and jobs growth (as planned) on the need for residents within the sub-region to commute to other locations to work.

Economic Forecasting Approach

- 1.8 In understanding the potential impacts of growth on the need to commute we first confirm the approach taken by each local authority within their employment forecasts. Each forecasting model includes an assumption on commuting as a key input into the model in order to provide an understanding of the relationship between potential population growth and potential jobs growth.
- 1.9 Whilst all forecasting models differ in their detailed methodology, on review it is clear none use the existing commuting rate as an 'absolute', with the models internally balancing the demand for labour (jobs) and the supply of labour (population) in each local authority area. Where a local authority area is forecast to provide more jobs than the workforce its population creates the models assume in-commuting will increase, where jobs will be below the workforce models assume out-commuting will increase. In equilibrium the commuting rates are held constant.
- 1.10 However, whilst the 'standard' base models align commuting between authority areas, each local authority evidence base varies both the population and employment forecasts through their respective SHMA and ELR scenario tests, with the effect that different levels of in/out commuting could result. Therefore, there is potential for the commuting relationship to be different from that assumed in any base model.
- 1.11 Further, depending on the date of each evidence base, the initial commuting pattern assumptions will vary, with some based on older Census data where 2011 information wasn't published. It is therefore critical to understand the model used in each local authority area, any specific considerations of commuting used and any conclusions drawn. A summary for each is presented below. For Maidstone we also consider how commuting has changed between the 2001 and 2011 Census given the evidence base was prepared using 2001 data.

Maidstone

- Base model used for economic forecasting: Experian Business Strategies (September 2013)
- In the Experian modelling approach used in the MBC Economic Scenario Testing & Employment Land Forecast Report, workplace and residence based variables are linked by the commuting relationship

derived from the 2001 Census, which is how the relationship between workforce and jobs is considered. 2011 Census data had not yet been released.

- Based on 2001 travel to work data;
 - 42,009 people live and work in Maidstone
 - Commuting inflow of 27,746, commuting outflow of 27,501. Therefore there is 60% self-containment (based on the 42,009 Maidstone residents who live and work in Maidstone, as a proportion of the 69,755 total Maidstone jobs).
- Based on 2011 travel to work data;
 - 30,693 people live and work in Maidstone
 - Commuting inflow of 29,999, commuting outflow of 31,095. Therefore there is 51% self-containment (based on the 30,693 Maidstone residents who live and work in Maidstone, as a proportion of the 60,692 total Maidstone jobs).
- In 2001 approximately 10% of trips by Maidstone residents to work outside of the authority area were to London. In 2011 this proportion had doubled, and approximately 20% of the trips to work outside of the authority area were to London. This increase is not surprising as London is a major jobs generator offering a range of employment opportunities, which means it is almost inevitable that residents will (increasingly) continue to commute to London from Maidstone, particularly where transport options have increased or services improved. This will (most likely) also be the case for other neighbouring local authorities in the South East region. It also suggests that the major factor behind the change in the 'self-containment' of the labour in Maidstone resulted from an increase in out-commuting to London rather than within the sub-region.

Swale

- Base model used for economic forecasting in Swale SHMA (September 2015), which informs Employment Needs in Swale (2014-31) Report: Experian (September 2015) – Experian commissioned to run three forecasts, varying population (or housing) assumptions. This is cross-checked with the Oxford Economics EEFM model, Autumn 2014 release (which has adjusted migrations flows compared to the Experian model “to reflect the comparative strengths and weaknesses of local economies”, amongst a range of other variations in modelling assumptions (Swale SHMA, page 53)).
- In relation to the consideration of commuting patterns in this modelling approach, it is suggested in the Swale SHMA (page 49) that “where labour supply exceeds demand (for jobs) the model adjusts other labour market variables. For example increasing out commuting, increasing unemployment or suppressing economic activity rates”.
- In the Experian modelling approach workplace and residence based variables are linked by the commuting relationship derived from the 2011 Census, which is how the relationship between workforce and jobs is considered.

Ashford

- Base model used for economic forecasting in Strategic Employment Options Report (2012): Cambridge Econometric's Local Economy Forecasting Model (LEFM), consistent with CE's Regional forecasts published in July 2011. Historical employment data in the baseline scenario is to 2009 so does not incorporate more up to date employment trends than this. The Baseline projection incorporates Ashford's economic structure, Ashford's past relative performance compared to the wider South East economy, trend based population growth, and macro-economic sector forecasts (July 2011).
- No specific information on the approach to considering commuting patterns is evident, however 2011 travel to work data could not have been considered as it was not yet published at the time this Report was produced.
- The SHMA Update (June 2015) uses the CE LEFM scenarios from the Strategic Employment Options Report (2012) in its modelling, and introduces an additional revised scenario incorporating CE's November 2013 forecasts. However, there is no information evident on the approach to considering commuting patterns in this revised scenario.

Tonbridge & Malling

- Base model used for economic forecasting in Tonbridge & Malling's Economic Futures Forecasting Study (January 2014): Experian Economic Modelling (May 2013 model run of Experian UK Regional Planning Service (RPS)). As stated in the Study (page 14) "This reflects a range of standard assumptions about the way in which the national and regional economy is expected to perform, incorporating short and long term drivers".
- In the Experian modelling approach used in the Economic Futures Forecasting Study, workplace and residence based variables are linked by the commuting relationship derived from the 2001 Census, which is how the relationship between workforce and jobs is considered. As was the case for Maidstone's evidence, the 2011 Census data had not yet been released.
- An alternative approach, forecasting future labour supply, is also undertaken. This uses the demographic scenario for OAN from the SHMA, where the modelling "takes account of economic activity rates and future pension age changes outlined in current national policy" which facilitates a more nuanced understanding of both in and out commuting, including the relationship of out-commuting with the London economy.

Tunbridge Wells

- Base model used for economic forecasting in the Sevenoaks & Tunbridge Wells Economic Needs Study (August 2016): Oxford Econometrics' 2014 East of England Forecasting Model (EEFM), considering both the 2013 and 2014 EEFM datasets, but then focussing completely on the 2014 EEFM dataset.
- The net commuting assumption in this approach is "the residual between an area's residence-based and workplace-based estimates of number of numbers of people in employment". The residence employment

consideration in this model relies on a commuting matrix from the 2011 Census and assumes no change in commuting patterns over time (EEFM Technical Report 2014¹, page 16).

Medway

- Base model used for economic forecasting in the Medway Employment Land Needs Assessment (2015): Experian Business Strategies (finalised and published in May 2015), which “factors in demographic trends and future expectations and changes” (Medway Employment Land Needs Assessment 2015, page 3).
- In the Experian modelling approach workplace and residence based variables are linked by the commuting relationship derived from the 2011 Census, which is how the relationship between workforce and jobs is considered.

1.12 As shown above, whilst the model base varies Maidstone, Medway and Tonbridge and Malling are all based on Experian data. This suggests that in terms of Maidstone's strongest economic relationships assumptions in the model are likely to be consistent.

1.13 The above analysis also shows that despite differences in the base models used for economic forecasting, the approach of all local authorities in the sub-region is to use the latest available Census data related to commuting as the starting point for understanding employment growth needs. This provides a level of consistency in the commuting assumptions given it is not then deliberately adjusted to incorporate any subjective ‘policy on’ scenarios.

Relationship between Population, Workforce and Jobs

1.14 Given there is no common forecast that ‘balances’ the demand and supply of labour across all the authorities outlined above it is helpful to consider, at a strategic level, the relationship between forecast population and workforce growth in relation to jobs projections in order to understand potential impacts on the need to commute.

1.15 It should be noted this only provides a broad understanding of potential commuting impacts given forecasts vary by time period and forecasting models are not identical. However, by understanding each local authority's forecast position against current commuting patterns, an indicative change in commuting need can be established.

1.16 In the table below the first four columns (A – D) detail the most up to date projection figures for population, homes, workforce and jobs for Maidstone and its five neighbouring local authorities, sourced from the most up-to date evidence bases for each local authority (see source list at the end of this paper). The remaining columns (E – K) consider commuting trends, and possible out-

¹ http://atlas.cambridgeshire.gov.uk/EEFM/EEFM_2014_technical_report_January2015.pdf

commuting influenced by the relationship between projected workforce and jobs growth (where 2011 commuting patterns are held constant).

- 1.17 Column E simply states the level of out-commuting observed in each local authority in 2011, combined as a total in the final row to show this for the whole economic sub-region. Column F calculates the proportion of local authority residents in 2011 who worked in their local authority area (local residents living and working in the LA / total workers in LA x 100). Column G calculates the proportion of LA jobs taken up by residents in that LA (residents living and working in the LA / total jobs in LA x 100).
- 1.18 Building on this analysis, column H determines the projected number of local jobs driven by the projected local workforce, which is calculated by multiplying the projected workforce by the 2011 proportion of local residents working in their LA, assuming this is held constant over the period ($C \times F$). Column I then calculates the number of local jobs that will be taken up by non-LA residents, multiplying the projected jobs growth by the proportion of jobs taken by non-LA residents in 2011, again assuming this is held constant over the period ($D \times (1 - G)$).
- 1.19 The projected jobs available for local residents is identified in Column J by subtracting the number of jobs taken up by non-LA residents from the projected jobs growth ($D - I$) and the difference between columns H and J is indicated in the final column. This difference constitutes the local residents prepared to work in their LA, but who would not necessarily find a job in the LA and would therefore be likely to out-commute. This therefore provides a crude calculation of the change in out-commuting reflecting the relationship between workforce, jobs growth and 2011 commuting patterns.

	Projected homes	Projected population growth	Projected workforce growth	Projected jobs growth	2011 out-commuting	2011 residents working in LA (%)	2011 LA jobs taken by LA residents (%)	Workforce driven local jobs	Jobs growth taken by non-LA residents	Jobs available for Local Residents	Difference
	A	B	C	D	E	F	G	H	I	J	K
Maidstone (2011 – 31)	928dpa	33,811	17,300	14,400	31,239	50%	51%	8650	7056	7344	1306
Swale (2014 – 31)	776dpa	25,000	7,870	10,900	22,825	55%	69%	4329	3379	7521	-3193
Ashford (2011 – 31)	727dpa	25,487	12,700	12,600	17,981	47%	49%	5969	6426	6174	-205
Tonbridge & Malling (2011 – 31)	646dpa	23,635	12,500	7,400 - 8,700	30,624	29%	29%	3625	5716	2335	1291
Tunbridge Wells (2013 – 33)	648dpa	19,210	8,640	9,168	42,477	50%	52%	4320	4401	4767	-447
Medway (2012 – 37)	1,281dpa	58,600	22,676	17,200	50,528	51%	70%	11565	5160	12040	-475
Whole Economic Area	5,006dpa	185,743	81,686	72,318	195,674			38565	32137	40181	-1724

N.B. The relevant projection periods for each local authority have been used based on their most up to date forecasting evidence, so some variation in the time range is evident.

The figures used in this table have been sourced from the most up to date evidence base studies for each local authority, produced by a range of Consultants. There may therefore be some variations in the methodological and calculation approach of these figures.

- 1.20 As shown in the table above in total there is an under-provision of jobs within the sub-region when compared to the number of workers that will be generated by forecast population growth. Whilst the relationship differs in each local authority area in total there would potentially be 1,724 residents who would need to commute out to work who would otherwise have worked locally.
- 1.21 Whilst this is clearly a simplification of the complex inter-relationships between population growth, employment and commuting it does give a sense of the scale of impact that forecast growth may have on residents commuting outside of the sub-region to work. Overall it would potentially see a further increase in out-commuting of c.1%.
- 1.22 It is not possible to robustly project out-commuting and the nature of these flows in terms of destination. However, it is anticipated that commuting to London will continue to increase from Maidstone and neighbouring authorities considering the significant employment role of London and the strong public transport connections already in existence.
- 1.23 Considering the close in-commuting relationship between Maidstone and the five local authorities, the majority of the out-commuting from the whole economic sub-region is expected to be to London boroughs, particularly considering the doubling in the out-commuting trend to London from Maidstone from 2001 to 2011. However, the trend of out-commuting is likely to predominantly reflect

the employment opportunities provided by London and does not necessarily mean there is an under-provision (or increasing under-provision) of jobs for local residents within their local authority areas.

Employment Land Provision

- 1.24 In terms of the employment land position across the whole economic sub-region it is evident that Maidstone and all local authorities are seeking to meet their quantitative employment need. The exceptions to this are Tonbridge & Malling which has not yet determined how much additional land will be allocated, and Tunbridge Wells which has not yet published a first consultation version of its new Local Plan.
- 1.25 A summary of the employment land position of Maidstone and the five neighbouring local authorities combined in the economic sub-region is as follows:

Maidstone

- There is a quantitative requirement for additional employment land for office and distribution (B8) uses to meet the maximum jobs growth scenario in its evidence base. There is also an identified qualitative need for employment land to match the likely land requirement of future growth sectors, as detailed in the Examination submission and evidence base documents.

Swale

- As indicated in the Swale Local Plan Examination Inspector's Interim Findings (March 2016); the ELR update translates projected jobs growth into floorspace requirements, and the monitoring of employment land indicates that the Borough continues to have sufficient employment land supply.
- The Borough's proposed main modifications to update its Local Plan evidence reference qualitative reasons for an oversupply of employment land (Main Mods 51/52/53), and allocations amount to an oversupply of 369,299sqm (Main Mods 58).

Ashford

- The Ashford ELR Sites Report (April 2016) identifies that there is a quantitative over-supply of 26.7ha – 27.5ha of employment land.
- In the Ashford Local Plan the Council concludes that "in broad terms there is sufficient land allocated already within existing adopted Plans to meet the overall land requirements to 2030...."

Tonbridge & Malling

- The Tonbridge & Malling Employment Land Review (December 2014) suggests a quantitative under-supply of employment land in the authority area to meet identified need to 2031. There is therefore a need to

identify 3 – 33ha of additional employment land alongside maintaining existing sites, in order to meet this identified need.

Tunbridge Wells

- The Tunbridge Wells Employment Land Review (2010) found that the local authority had sufficient capacity to fully meet their identified employment land needs, with no demonstrable over supply.
- However, updated evidence in the Sevenoaks and Tunbridge Wells Economic Needs Study (August 2016), forming part of the evidence base supporting the emerging new Local Plan (at early evidence gathering stage), indicates that in quantitative terms there is a 12.3ha shortfall in employment land to accommodate growth up to 2033/2035. There is therefore a recommendation to address this through new land allocations, which will also support a qualitative case for increased choice of sites. As the new Local Plan is at a very early stage, the Council's response to addressing this shortfall has yet to be formalised, it is therefore unclear if this need will be met within the borough.

Medway

- In its Development Options (Regulation 18) consultation document, Medway Council indicates it is planning to fully meet its quantitative need for 90ha of employment land over the plan period to 2037. Allocations in the previous plan would also provide additional capacity to meet qualitative requirements. The full employment land strategy will be clarified following the completion of the current Regulation 18 Local Plan consultation (16th January – 6th March).

Conclusion

- 1.26 Whilst the analysis within this paper is only able to provide an indicative understanding of the relationship between projected population and employment growth and its implications for commuting, it is clear that based on current evidence, the impact would most likely be small.
- 1.27 Given trends in out-commuting to London (which have increased from most boroughs between 2001 and 2011) as well as significant jobs growth planned in other locations that are easily accessible (for example Ebbsfleet, London Paramount, Discovery Park) it is likely that the additional 1% in potential out-commuting would be absorbed elsewhere.
- 1.28 All local authorities within the sub-region have identified a need for additional employment land based on both quantitative and qualitative, only Tonbridge and Malling and Tunbridge Wells are yet to identify sufficient land capacity to meet the identified requirements because of the stage they are at in the plan making process.
- 1.29 For Maidstone specifically there would be a deficit of c.1,300 jobs if in-commuting remains constant, this would potentially increase the level of out-commuting by approximately 4% over the plan

period. Given the level of growth in out-commuting to London between 2001 and 2011 (10%) this would not represent a significant increase in commuting trends.

Sources

Ashford Strategic Employment Options Report (2012), found at: <http://www.ashford.gov.uk/local-plan-2030-evidence-base>

Ashford ELR Sites Report (April 2016), found at: <http://www.ashford.gov.uk/local-plan-2030-evidence-base>

Maidstone, Ashford and Tonbridge & Malling SHMA Update (2015):

http://www.maidstone.gov.uk/_data/assets/pdf_file/0003/94035/Strategic-Housing-Market-Assessment-Update-Affects-of-the-2012-Based-Household-Projections-2015.pdf

Maidstone Economic Sensitivity Testing and Employment Land Forecast (February 2014):

http://www.maidstone.gov.uk/_data/assets/pdf_file/0003/47640/Economic-Sensitivity-Testing-and-Employment-Land-Forecast-February-2014.pdf

Sevenoaks and Tunbridge Wells Economic Needs Study (August 2016):

http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0003/134238/Economic-Needs-Study_Final-Report-with-appendices-min2.pdf

Tunbridge Wells SHMA (2015): http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0007/98521/SHMA-final-September-2015.pdf

Tunbridge Wells Employment Land Review (2010):

http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0018/26424/Employment-Land-Review-Update-Oct-2010.pdf

Swale SHMA (2015): <http://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/Local-Plan-2014/Further-evidence-2015/Part-1-SHMA-Sep-15-SBCPS025a.pdf>

Swale SHMA Update Development Needs Study (2013): <http://www.swale.gov.uk/assets/Planning-General/Planning-Policy/Local-Plan-2013/Misc/13164-Swale-SHMA-Update-Development-Needs-Study-Final-Report-Issue-Low-Res-March-2013.pdf>

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Swale SHMA Appendix (2015): <http://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/Local-Plan-2014/Further-evidence-2015/SBCPS025b-Appendix-A1.pdf>

Swale Local Plan Examination Inspector's Interim Findings (March 2016): <http://www.swale.gov.uk/examination-document-library/>

Medway SHMA Report (2015): <http://www.medway.gov.uk/pdf/Medway%20SHMA%20Final%20Report.pdf>

Medway Employment Land Needs Assessment (2015):

<http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

Medway Local Plan Cabinet Report, 20 December 2016

<https://democracy.medway.gov.uk/mgConvert2Pdf.aspx?ID=10094&T=9>

Tonbridge & Malling Economic Futures Forecasting Study (January 2014):

https://www.tmbc.gov.uk/_data/assets/pdf_file/0006/134565/Economic_Futures_Forecasting_Study_Final_160114.pdf

Tonbridge & Malling SHMA (March 2014):

https://www.tmbc.gov.uk/_data/assets/pdf_file/0006/134673/TMBC_SHMA_March2014_web.pdf

Tonbridge & Malling SHMA Update (2016):

https://www.tmbc.gov.uk/_data/assets/pdf_file/0003/242319/SHMA_Sept_2016_Update.pdf

APPENDIX B

Calculation of Windfall Allowance for Offices

Table 5: Completions contributing to calculation of windfall allowance (B1a)

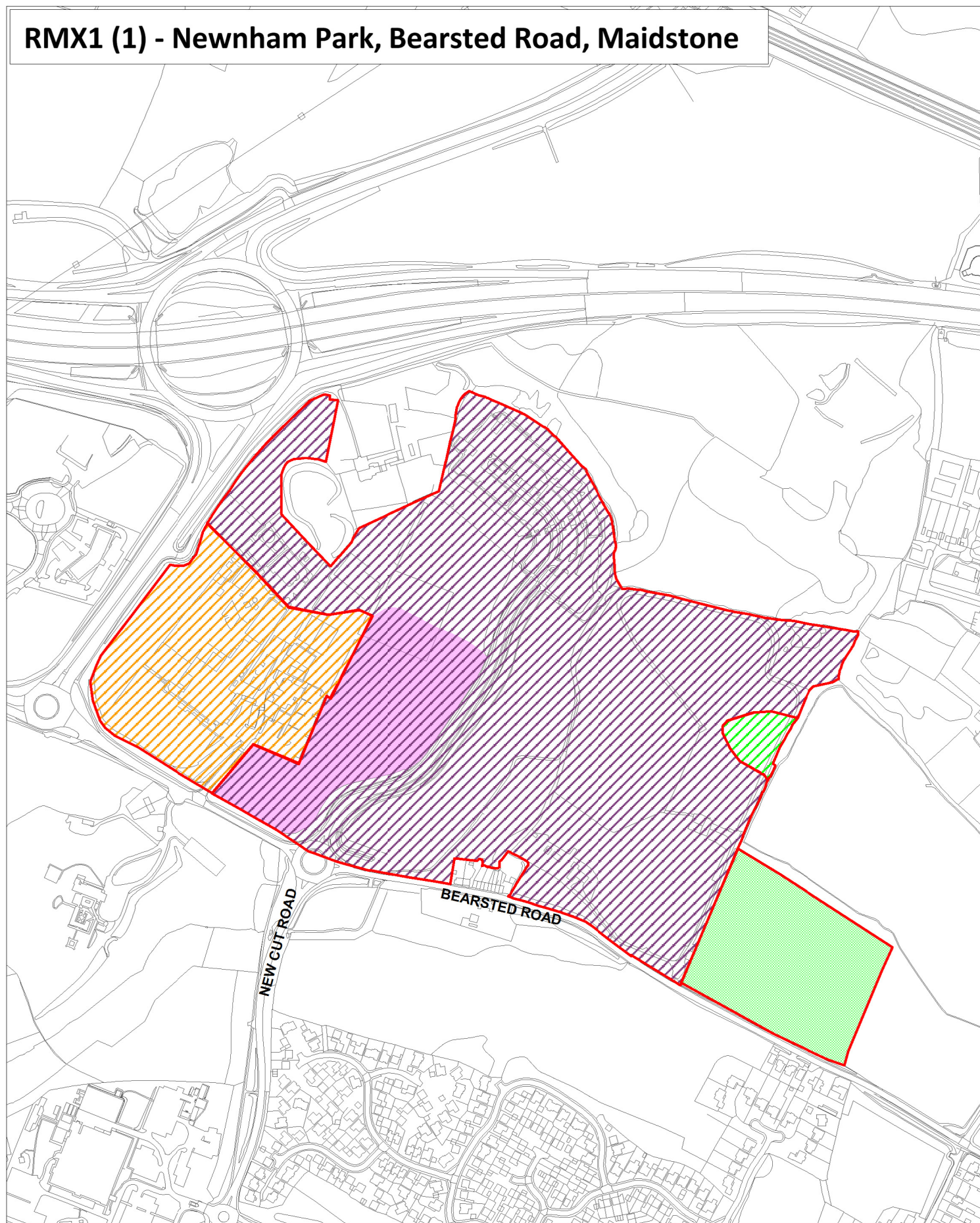
	Application	Town Centre Site/Rest of Borough	B1a Floorspace completed (sqm)	B1a floorspace completed /year (sqm)
14/15 and 15/16	MA/15/503384 Second Floor Sussex House 21 – 25 Lower Stone Street, Maidstone ME15 6YT	TC	225	1709
	MA/14/5285 Allington Marina, Castle Road, Maidstone ME16 0NH	RoB	41	
	MA/15/505223/FULL Maidstone Library St Faiths Street	TC	1443	
13/14	MA/11/1950 Rankins Farm, Linton Hill, Linton	RoB	139	215
	MA/11/1859 First floor, 89 Week Street, Maidstone ME14 1QX	TC	76	
12/13	MA/09/1150 South East Water, Hockers Lane Maidstone ME14 3JJ	RoB	153	567
	MA/10/1524 12 Marsham Road, Maidstone. ME14 1EP	RoB	118	
	MA/11/0995 3 -5 Brewer Street, Maidstone	TC	296	
11/12	MA/10/0140 Corbin Business Park Caring Lane Bearsted ME14 4NJ	RoB	1030	1285
	MA/09/1044 Senacre Housing Co-Op, Ascot House, Epsom Close	RoB	21	
	MA/10/1267 First floor, 17 Earl Street, Maidstone	TC	164	
	MA/10/2180 First floor, Lenham Library, The Square, Lenham.	RoB	70	
Total Town Centre				2,204
Total Rest of borough				1,572
Total				3,776
Average /annum				755

Calculation






Delivery of, on average, 750sqm of office floorspace over the past 5 years

12 years (2019/20 – 2030/31) @ 750sqm/annum = 9,000sqm

RMX1 (1) - Newnham Park, Bearsted Road, Maidstone



Legend

-  Retail allocation
-  Medical and associated uses allocation
-  Woodland Nature Reserve
-  'grassy knoll' area to be excluded from development
-  Area not covered by planning consent 13/1163



To: Planning Policy, Regeneration, Culture, Environment and Transformation.

From: Mr & Mrs R J Tilley

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dear Sirs

We have read the consultation document and attend the exhibition at Riverside Country Park and would like to take issue with the following.

- Lodge Hill: I note that in the glossy propaganda there was no mention of this being a SSSI site. This is an important site for wildlife so how can you claim that you “balance growth with care for the environment...” and consider building on a SSSI site.
- With a proposed 29500 new homes being built how can we maintain our open spaces and how will they improve the area for the local residence, as far as we can see these homes are for incomers from perhaps the London suburbs who find the prices here cheaper. Unfortunately this inflates the local housing prices therefor making them unaffordable for the local population.
- Medway is an area not a town or city. Gillingham, Chatham, Rochester and surrounding areas make up the Medway towns, governed by the unitary authority of Medway. Can a unitary authority become a city?
- Medway Hospital: Before all this new building work goes ahead, what is going to happen with Medway Hospital, a hospital that is in special needs and can't cope with the patients it has now! What measures are being put in place to cope with this envisaged 330,200 population! Where are all the extra doctors, nurses and teachers that will be needed for such a large population.

I understand that Medway authority is under pressure from the government to build all these houses but we think the area cannot sustain such development and deliver all that has been promised in the promotional leaflet

We have lived in the Medway Towns for over sixty years and have witnessed the decline in Chatham and Gillingham High Streets. In all those years we seen the one way system introduced in Chatham which now takes you nowhere fast! A flyover built and taken down, at I'm sure, great cost. A huge office block that was empty for years and overshadows the Town Hall. The one aspect that has in our opinion does look promising and seems to be the way forward is the development of the university area of the Quays. These building are bright and a good use of the area of land available.

In fact we have seen nothing else that encourages us to look forward with any great expectations of the fruition of these plans.

Yours faithfully

Mrs Marie Tilley & Mr Robert Tilley

From: [REDACTED]
Sent: 18 April 2017 09:49
To: futuremedway
Subject: Medway Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

Please see my comments below on the Draft Local Plan 2012-35

- Despite the predicted rise in the number of older people in Medway, and the way in which this will affect the proportional age balance of Medway's population, the draft of the Local Plan makes very little specific provision for this significant change.
 - There are limited references in the Plan to the needs of older people and the ways in which these will change over the lifetime of the plan.
 - The policy in the Housing section of the Plan seems very limited and does not really reflect the complexities of an ageing population. It is actually shorter than the policies on mobile homes, self builds, student accommodation and travellers, despite the huge disparity between the numbers of older people in comparison to these other groups.
 - I understand that older people not a race apart and are affected by many of the other policies in the Plan, but the elements of the Plan that are specifically about older people do not seem to create a future in which the significant rise in the proportional size of this group is an integral part of Medway's future.
 - Unless this receives much more thought and provision then a generational opportunity will be lost across the lifespan of the Plan.
 - Policies in the Plan should reflect the complexities that specifically affect older people living in Medway as at present these appear to be simplistic afterthoughts.
- The Plan lacks a compelling view about how alternative forms of transport will be provided for. This is especially the case for cycling which appears as an afterthought throughout the document. There is no sense in which the future development of Medway will make it into a place in which cycling will be the first rather than the last choice for short to medium journeys.
 - Cycling is seen primarily as a recreational activity in the Plan and not as a fundamental transport mode (there are some minor concessions to the provision of cycle parking near transport hubs). As such there is no sense in which facilities for cyclists will form an integral part of traffic planning for the future.
 - This is not about small scale cycle facilities at individual locations that actually create barriers to cycle use (less direct, slower, cyclists giving way to every other road user etc).
 - The needs of cyclists should be considered at the fundamental planning stage for any new roads. It should also be reflected in a network development across the existing road infrastructure, either funded through the Local Transport Plan, or developer contributions. Developer contributions should not stop at small (and poorly thought out) changes at new road junctions, but should be used to support the whole cycling network.
 - Cyclists should be given facilities that encourage them to use roads on at least an equal footing with vehicles. Cyclists travelling on main routes should not have to give way to side roads and private entrances. They should not have to travel convoluted routes (including crossing back and forth over main roads).
 - The Plan should make this a much more integral part of its thinking as at present cycling is an afterthought.
 - The Plan should provide a future vision for Medway as a cycling centre and an example to other major conurbations.

- The relationship between traffic management, safety, health and wellbeing benefits caused by cycling should be a much stronger theme within the Plan.
 - This also applies to other forms of transport and there again is no compelling policy within the Plan that will drive a shift from cars to public transport or walking.
- The ideas about Chatham town centre seem flawed, and appear to rely on developments in physical infrastructure generating a more thriving economy and community based activities.
 - The basic issue with Chatham (and other areas in Medway) is the offer. There appears to be no attempt in the Plan to shift up the focus to an offer that would raise the economy of the area.
 - Despite having a reasonably sized student population this seems to have no effect on Chatham town centre (unlike other towns such as Brighton). The Plan does not seem to reflect this except for accommodation, and there seems to be no attempt to reflect and realise the potential economic impact of students living in Medway.
 - Chatham has had a centre that for years has been resolutely heading towards the lowest common denominator. No amount of new public infrastructure is going to change that. You visit Chatham because you have to not because you wish to. Even small towns, such as Totnes in Devon have more than Chatham with significantly smaller populations. We are light years behind areas in Brighton (such as North Laine) which seems to synthesise the student, alternative culture and visitor populations.
 - Unless we can create a much more vibrant area such as the ones above Chatham will remain downmarket and unattractive no matter how much money is invested.
 - I do not think there is a magic bullet for this, but the Plan ought to at least to present policies in which this is acknowledged and which can form the basis for a change in the thinking about Chatham.
- Development on the Hoo Peninsula may have to occur to reach housing targets, but if this occurs it is necessary that developers are required to pay significant sums to ensure that the remainder of the peninsula retains and enhances its unique layers of heritage (environmental, historical, agricultural and cultural).
 - The Plan reflects, in the main, small proposals sitting on the back of new developments that will have no impact whatsoever.
 - The Hoo is a unique area and the things that make this so will disappear without a more coherent view about how this will be preserved.
 - Contributions from developers must be thought about in this wider context and policies developed in the Plan to ensure that this coherence can be used to take advantage of developments in a positive way.
 - This is of course on top of ensuring the basic facilities to support the growth of these new communities.
- Health inequalities are not a function of facility siting but basic income inequality.
 - The main focus of the Plan ought to be more on economic regeneration with better paid and sustainable jobs for poorer residents.
 - This requires a move away from a determinedly low wage economy that reinforces health, social, educational and cultural inequalities.
 - The Plan ought to reflect this much more clearly than it does at present. The current draft reflects a series of inadequate sticking plasters, which are exceptionally dependent on public funding that is already inadequate and is being squeezed even further. It is mainly aftercare of the most basic nature and the Plan does not really reflect the wider causes of the underlying problems.
 - The Plan needs much stronger policies that recognise and seek to address fundamental income inequalities in the area.
 - Without this Medway will not move forward as we are significantly underperforming at a regional and national level. Given our population we should be a significant economic centre in Kent and the wider South East but we underperform even small towns such as Faversham.

Mark Williams And Tina Carwardine



Dear Sir / Madam,

I am writing in response to the Draft Vision and Strategic Objectives outlined in the Medway Council Local Plan 2012 - 2035 and I would like to raise the following concerns regarding the considered development at Cliffe, in particular the land between Chancery Road and Cooling Road and also the land adjacent to the Telephone Exchange and North to Buttway Lane.

Many of the concerns would also apply to Cliffe Woods as the main access to local towns from Cliffe is via Cliffe Woods and other aspects of the local infrastructure are also shared between the two villages.

Having had a look at a map of the local area, if the two main proposed sites at Cliffe were put forward for development, it would appear to me that this could potentially double the size of Cliffe which has far reaching implications for the village and any significant development would, I believe, have a negative impact on this treasured rural setting and substantially change its character.

There would be an impact on the local environment as currently the land is used for growing crops, land that is very high grade and valuable for growing food efficiently and building on land used for this purpose would also have an impact on Carbon absorption and drainage.

Cliffe has long been a farming community and the landscape and features relating to this should be respected as this is the reason many people live in the countryside for this type of scenery and rural setting. This rural setting is a direct contrast to living in towns or cities.

Regarding Agriculture in general, at a time when the Common Agricultural Policy and membership of the European Union is ,to say the least, 'under review', the majority of the UK's food is imported, there are millions of people in the UK in what could be considered Food Poverty, our import costs have the potential to rise considerably due to the exchange rate and potential import duty, the decision to destroy valuable food producing land at a time when the population is increasing significantly has serious implications as far as I am concerned. I cannot understand why an exponentially growing population would choose to reduce its ability to grow food.

I believe there is a government directive to encourage the population to consume more fresh fruit and vegetables and to reduce Food Miles and its wider implication for the environment and so I believe Food Security is not something that should be taken lightly in an ever changing world and add to this the way the way climate appears to be changing, there must be less valuable land that could be considered for redevelopment.

Taking all of the above into consideration, valuable farming land and the skills of the farming community should not be taken for granted and the long term future way past 2035 should also be considered as once very fertile and productive soil is destroyed by development it is very difficult to regain.

Back on to a more local and personal level, if the fields between Chancery Road and Cooling Road were developed, the view from house of the countryside, farming land, the hills and woods in the distance would be completely obscured by any development in this area, a view that many others living adjacent to this land would also share. In my mind there is no better rural view than a field of ripened wheat and it is something I have looked forward to for as long as I can remember over the 45 years I have lived in the village and I greatly enjoy the fact that I can see my parents' house, my childhood home on the opposite side of the proposed development.

From a more practical point of view, the local infrastructure is already, in my opinion, at capacity.

The local school is full, the waiting time to see a GP has increased considerably recently, the single main road leading to Cliffe is narrow, the sewage system at the other side of Cliffe woods struggles to cope with the current population, the broadband and phone system in areas of Cliffe, in particular where I live, is unreliable due to out of date cable technology, mobile phone coverage is limited, there is no visual Police representation, facilities for young people are minimal to name a few examples.

The transport structure to the village is limited with an expensive taxi journey many times the only transport option, the roads or lanes are restricted, the shops are small, there are no big business' fancy coffee shops, cinemas or gyms and that is exactly how it should be.

Our local shopkeepers and landlords should all be treasured along with all the other features that make the villages what they are and which would be lost for ever if these areas were developed considerably.

All this considered, I accept that there are disadvantages to living in a relatively isolated community because the benefits of the local surroundings far outweigh factors that some people may consider to be unfavourable.

In summary, I believe, any significant development of Cliffe, Cliffe Woods and most likely the other rural villages on the peninsular would have a detrimental impact on their character, the local environment, the infrastructure, the countryside views and wildlife.

There are local implications regarding traffic generation, car parking, and general amenities with far wider implications for food security and the economy if such valuable land is destroyed to house a rapidly and uncontrollably growing population that relies on it for its own long term survival.

It is for the reasons above I would oppose any significant development at Cliffe, and Cliffe Woods for that matter as development spreads and if Cliffe woods is developed then Cliffe Will be next in line and it would only be a matter of time before all the countryside local to the two villages is consumed by development and roads.

Yours Faithfully

Mark Williams And Tina Carwardine

From: [REDACTED]
Sent: 17 April 2017 21:38
To: futuremedway
Subject: Medway Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam

I would like to submit some views on the local plan consultation. These don't quite fit with your online questionnaire so I hope it is acceptable to feedback via email instead.

I feel that the priorities for development, based on the options provided in the consultation, should be Urban regeneration (1B). It feels like a no brainer to not initially focus on the opportunities to regenerate the urban areas. Existing regeneration plans and government guidelines both point towards brownfield redevelopment being the first thing Local Authorities should look towards in order to meet new development needs, and therefore taking as much of this option as possible forward would be the most sensible step to delivering the local plan.

It is mentioned to some degree in the documentation but I do agree that urban regeneration alone is unlikely to deliver in a logistically feasible way all of the needs of the plan and so picking up sustainable options from options 1C as part of this work would be sensible. However I am **strongly opposed** to the extension of the peninsula villages, significant development at Lodge Hill, building at Capstone, or substantial new development at Hoo St Werburgh (which has already grown significantly over the past few years). After the debacle that was the Land Securities bid to develop Lodge Hill a couple of years ago I had hoped the council had moved on from its goal of mass destruction of the countryside, I urge it to consider this further before approving thousands of new homes in these areas. The local villages, with the possible exception of the industrial Isle of Grain are similarly not the first places for building just because they look the easy option. Preserving rural life is important, for quality of life and environmental reasons. The peninsula and Capstone are the lungs of Medway and should be left alone as much as is possible in order for the green spaces and woodland we already have to remain intact. There is still farming on the peninsula and a large percentage of that land is grade 1. Once built on, this land would be lost forever. So don't build on it!! Small, sustainable development pockets should obviously be considered, but proposals for mass building/extensions of existing areas are pretty disgraceful in my opinion. Many people have chosen to live in the rural spaces, in existing or small new developments, over the past 10 or so years, and these should not be taken away from them purely because of government targets. Build, build, build should not be Medway's motto.

More generally, the idea that a plan made in 2017 will deliver the needs of 2035 is a little pie in the sky in my view. The needs of Medway, the South East, England, and indeed the entire UK are ever changing and it is impossible to know now not only what is needed in the future, but also how that need will be met. Whilst I appreciate that the council needs to meet central government directives to deliver a plan, I would urge it to consider a phased approach to development. If "pods" of development could be carried out, the new infrastructure needs tested to see if they can be fulfilled, and then this development scaled appropriately I believe the impacts on the existing area would be minimised. I question the growth target for Medway in general. I could not see any clear information in the documentation as to where the 30,000 home target comes from, it doesn't feel like this is based on any firm knowledge, indeed the immigration/population growth figures for the future are unknown. Phasing development based on shorter term, and more reliable figures would be sensible.

The fact that impact on the existing areas and residents over the timescale of the plan is not mentioned in any detail is of concern. The plan discusses infrastructure and health and sets some bold goals, but does not discuss in any detail how these goals will be met. For example item 9.9 says "There are high numbers of GP's practices where the number of patients per GP is above the national average". Simply building more surgeries/extending existing ones will not resolve this issue. The St Werburgh Medical Practice was extended in size a few years ago, but the number

of GPs working there has decreased. Locum doctors fill some gaps but making an urgent appointment at the surgery is close to impossible. Recently my wife spoke to one of the GPs at the practice and was told that there were not enough doctors for the patients but that wasn't for the want of trying by the surgery, there simply were not enough doctors for the vacancies that exist. I also understand a similar issue exists in regard to teaching vacancies. The fact the authority no longer controls the majority of schools in the area due to academisation does not mean it can ignore the issue. Families that move in to the new homes will need access to education and healthcare provision that I do not believe the local plan comes close to addressing. We do not live in a Field of Dreams "If you build it, they will come" world, a focussed plan to recruit (and bring to the new housing developments) targeted key personnel needs to be considered. The impact on emergency service cover is not mentioned at all as far as I can see. How will the police, ambulance and fire services be impacted? The final, and very obvious, area for discussion here is transport. Our roads are already gridlocked during the rush hour periods, the speed limits in the tunnel are testimony to this. With all the new housing to be built, where will the roads go? The authority cannot provide good public transport services now, and I see nothing in the plan that suggests this will change.

Finally I am not convinced that the employment areas mentioned in the options are necessarily going to take off. I imagine Medway will continue to grow as a university town and as a commuter town. I don't see that mass employment opportunities are suddenly going to present themselves here (outside of retail) and I'd be interested to see the studies the council has undertaken that suggest otherwise. I would welcome more local employment opportunities, but something will need to be done to actively support this. Section 5 of the plan merely highlights that right now there is a long way to go to address local employment issues.

I hope these views will inform the decisions taken.

Kind regards

A large black rectangular redaction box covering the signature area.

MEDWAY ALLOTMENTS FEDERATION

Chairman: Mr D Wyett

Planning Policy, Regeneration, Culture, Environment and Transformation
Medway Council
Civic Headquarters
Gun Wharf
Dock Road
Chatham
ME4 4TR

24 March 2017

Dear Sirs,

RE: Medway Council Local Plan 2012-2035.

I would like to comment on the above, on behalf of the 1252 local families that are lucky enough to have use of an allotment and the 442 families that are still waiting to obtain their own plot.

The Medway Wildlife Countryside and Open Space Strategy 2008-2016 set a target of 15 plots/1,000 households by 2016 (page 62 table thirteen). In addition accessibility of allotments should have improved so that newer developed areas such as Lordswood, Parkwood and Walderslade have greater access with 90% of tenants being able to obtain a plot within 1km of their homes by 2016 (page 64 table fourteen).

Medway Council was able to achieve the first target. This was done by
1/. Opening two new sites, Watts Meadow, Rochester (16 plots) and Chapel Lane, Hempstead (130 plots).
2/. By halving larger plots (250 sq metres and above), so that two families can share the one plot.

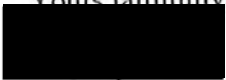
Medway Council failed to achieve the second target and only by opening Chapel Lane did the figure improve at all. Over the last few years the accuracy of reporting the number of plots utilised (98.5%) and the number of families on the waiting list (442) has improved. The council's website is updated every other month so that figures are current.

Although the new local plan proposes an increase in housing by nearly 30,000 homes there is no mention of any increase in allotment provision. There will need to be an increase of 450 new plots in order to keep to the original target. The location of new sites would have to be thoroughly researched in order to improve the figures for the second target. Any increase in plots would have to be done on an "as required" basis so as not to waste limited finances.

Without more allotments being made available during the 18 years remaining of this latest plan it is hard to see how the council's aim of having an "attractive Medway with healthier communities" will be achieved.

Allotments fulfil many aims, plot holders that come from different countries, cultures and religions coming together with a common aim of being able to grow healthy food for their families. Fresh air, regular exercise and comradeship for those living on their own are all benefits which far outweigh the costs when compared to the upkeep of open spaces and leisure centres.

Yours faithfully,

A black rectangular box redacting the signature of D WYETT.

D WYETT
CHAIRMAN

cc. **Alan Jarrett Leader of Medway Council**
 Rodney Chambers OBE Portfolio Holder that includes Regeneration
 Howard Doe Portfolio Holder that includes allotments
 Paul Schmoeger Medway Norse responsible for managing allotments

Name: Noel Filmer BSc (Hons) MRICS
Head of Valuation and Asset Management

Reference:

1121

Organisation:

Medway Council: Valuation and Asset Management Team

On Behalf of:

Medway Council (as Landowner)

Type of Consultee:

Agent for Landowner

Medway Council Local Plan

Submission

by

Medway Council Valuation and Asset Management Team

for

Medway Council as Landowner

March 2017

1. INTRODUCTION

1.1. Context

- 1.1.1. This document relates to Deangate Ridge Golf Course and Sports Complex Hoo as shown shaded pink on the plan at Appendix A.

2. SITE SUBMISSIONS

2.1. Introduction

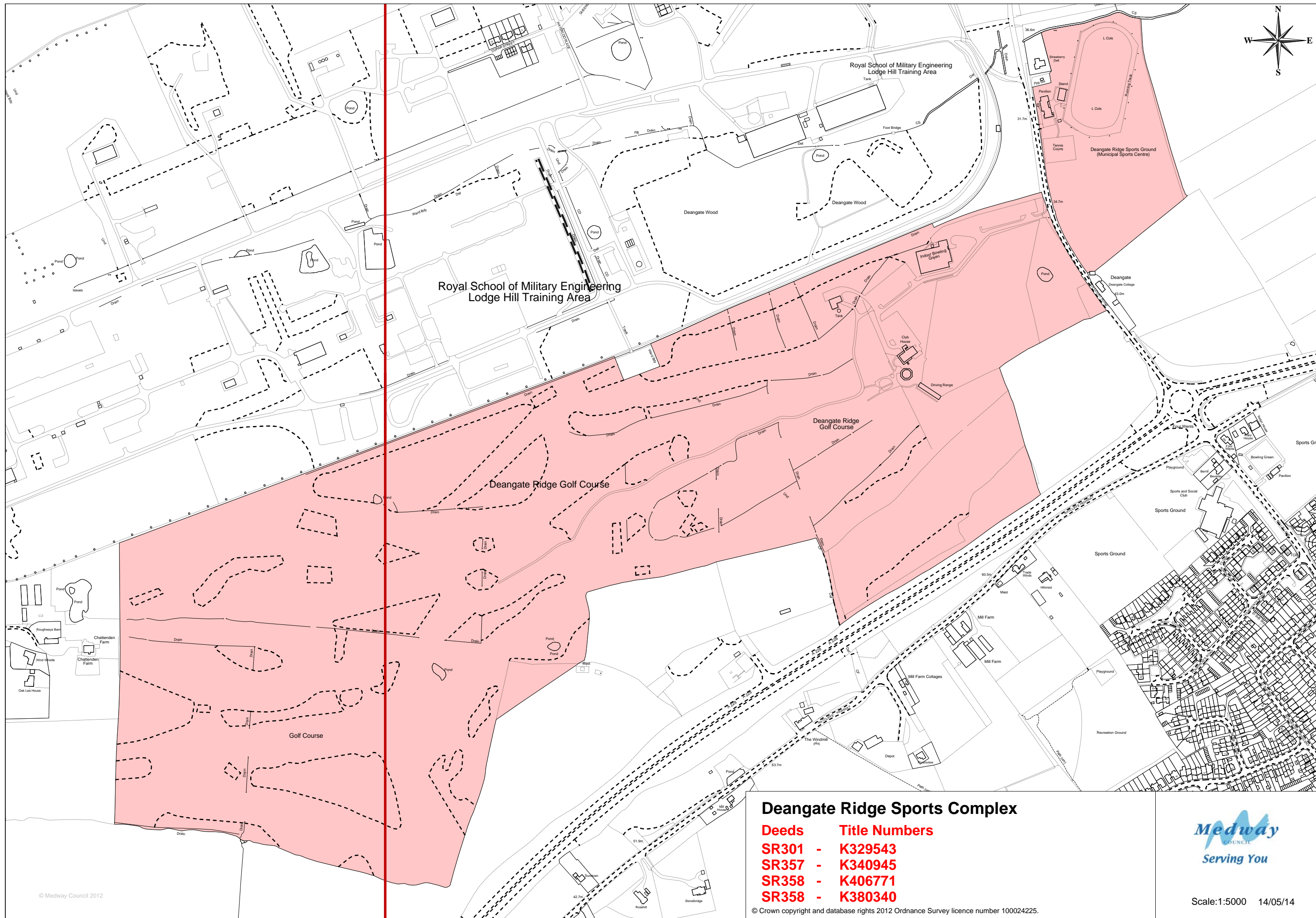
- 2.1.1. Medway Council as Landowner supports the promotion of the land at Deangate Ridge Golf Course and Sports Complex Hoo, for inclusion within the Medway Local Plan as a housing allocation. Please see the site plan attached at Appendix A.
- 2.1.2. The site is not used intensively and is capable of helping meet Medway's housing growth needs together with an appropriate amount of community infrastructure.
- 2.1.3. At present, detailed assessments have not been carried out, however where possible, base line information is provided that demonstrates that the site is suitable, available and deliverable for a housing lead development site.
- 2.1.4. The following summary is provided in respect of the site submission.

- **It is a deliverable Housing Site** – The site can make a valuable contribution to the housing land supply for Medway. The site can assist in providing the supply of housing required to meet the needs of present and future generations. The whole site is deliverable within the plan period. The site to the west has an area of around 67.1 ha (165.9 acres). So at a density of only 24 dwelling per hectare the site will be suitable for up to 1,600 dwellings. It is proposed that the land to the east area of around 5.8 ha (14.3 acres) is retained for community facilities.
- **Provision of Affordable Housing** – The site can deliver 25% policy compliant affordable homes.
- **Provision of Market Housing** – The site can deliver high quality market family housing which will meet the needs identified in Medway.
- **Access to Community Facilities** – There is a range of community facilities available in Hoo. This proposal will help to support the vitality and viability of these.
- **Public Transport** – Hoo is well served by existing public transport which provides connections to wider services and facilities available in Medway. The best and most sustainable way of maintaining and improving bus services is with an appropriate S106 contribution. This existing service will be extended to serve the site becoming sustainable when the site is fully developed.

- **Public Open Space** – The development of this site will deliver formal and informal public open space benefiting both new and existing residents.
- **New Pedestrian and Cycling Links** – New links will be created through the site.
- **Travel Plan** – The site is located in a strategic position directly adjacent to the A228 Hoo Bypass. New development will assist in establishing travel habits that concentrate on reducing reliance on the private car. Travel plan measures will be deployed from the outset of occupation of the development.
- **Population Growth** – An increase in population within Hoo will help to sustain and support its role as a large village/small town and will reinforce its vitality and viability, its businesses, services and facilities.
- **Labour Force Supply** – The development will provide additional people of working age that, as economically active residents, will help to support the sustainability of Medway's economy.
- **Construction Jobs** – Employment opportunities will directly arise from the site construction together with supply chain job opportunities.
- **Resident Expenditure** – Residents will spend money and boost the local economy.
- **New Homes Bonus & Council Tax** – Medway Council will be the recipient of significant funds arising in respect of the New Homes Bonus and future revenue from Council Tax/business rates, all of which will help sustain essential facilities and services in Medway.
- **Ecological Benefits** – The development site presents opportunities for biodiversity enhancements. Currently the site is predominantly used as a golf course and is of low ecological value. The provision of new green infrastructure with the development will enhance ecology.
- **Biodiversity** – The development proposals will greatly enhance Flora and Fauna helping to compliment the nearby SSSI.
- **Flooding** – The site is not recorded on the Environment Agencies maps as being at risk of flooding.

APPENDIX A

SITE PLAN



Deangate Ridge Sports Complex

Deeds	Title Numbers
SR301	- K329543
SR357	- K340945
SR358	- K406771
SR358	- K380340

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From: kirk, lucy
Sent: 02 March 2017 16:36
To: futuremedway
Cc: trainor, alison; england, tim
Subject: Local Plan 2012 -2035 consultation comments

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir

The Environmental Protection team have the following comments to make on the 'Local Plan 2012-2035' Development Options consultation.

It is important to recognise that all of the proposed development scenarios outlined in the Development Options document pose potential environmental risks to a greater or lesser degree, and could all present challenges in terms of air quality, noise and land contamination. The degree of potential impact will be dependant to a large extent on the nature of each development and the locality.

Air Quality- Section 7: Natural Environment and Green Belt

This section includes a segment on air quality which is very pleasing to see. We have the following comments to make on this section.

The general policy approach to Air Quality is supported, and is consistent with the current approach being taken by the Environment Protection Team when considering proposals being brought forward through the planning process.

Section 7.25 of the above section is slightly confusing as it appears to be mixing up the Medway Air Quality Action Plan with the Medway Air Quality Planning Guidance. If the wording of this section is carried over into subsequent local plan documents it will require some rewording so that it is more clear.

Section 7.26 should have recognised that developments may not just create new AQMA's, but can also worsen air quality in existing AQMA's.

Section 7.27 Renewable energy sources can pose challenges to air quality. A notable example of this is biomass burning. A shift towards more biomass burning in urban areas of Medway could have significant impacts on air quality and public health if only the potential climate change benefits are considered. This could conflict with local plan policies relating to energy, therefore there will need to be very careful consideration of the air quality impacts as appropriate.

Noise and land contamination

The Development Options consultation document does not make any specific reference to noise (including vibration) or land contamination. These are both important factors which need to be considered and require policies to be developed so that the Council can ensure that these issues do not have a negative impact on new and existing developments within Medway. We would welcome the opportunity to work with the Planning Policy team to develop these areas more fully.

Noise can significantly affect the quality of life of local people, and has associated health related impacts where there is exposure to elevated levels of environmental noise. Noise may come from a variety of sources, including road, rail and air traffic, industrial processes and recreational activities. Certain forms of development, for example residential development, can be particularly sensitive to noise and there are strict noise criteria which should be achieved if negative effects of exposure are to be avoided. There has been a significant amount of change in relation to the guidance available on the assessment of noise relevant to planning as a result of the introduction of the

National Planning Policy Framework, which has introduced uncertainty into the consideration of noise for new developments. One way in which this uncertainty can, and is being addressed by local authorities is through the production of local planning guidance on noise which sets out how noise from new developments should be assessed, and how the significance of impacts is classified.

As with air quality the Environmental Protection team recommends that a robust policy for noise is developed, which would support the use of local planning guidance to secure sufficient mitigation for noise, with the aim of preventing substantial loss of amenity and health impacts. A local guidance document would be able to draw on other relevant sources of guidance including World Health Organisation guidelines, British Standards etc.

The re-use of derelict land/brownfield sites can contribute towards the revitalisation of urban areas and reduce the need to use fresh land outside built-up areas. However, such land might be contaminated and require remediation. New development may need to incorporate measures for adequate protection from contamination. The best way of minimising any associated risks is to ensure that sites which may be contaminated are identified at an early stage. A desk study, risk assessment, and any necessary investigations, will then need to be carried out by the developer, and the results evaluated. Mitigation measures (remediation) will need to be agreed before there is a decision on the suitability of the proposed development.

As with air quality the Environmental Protection team recommends that a robust policy for land contamination is developed, which would support the use of local planning guidance to ensure that land contamination is dealt with appropriately and where necessary remediated to ensure that there are no negative impacts on human health, controlled waters or other relevant receptors. A local guidance document would be able to draw on other relevant sources of guidance including Groundwater Protection: Principles and Practice (GP3), the Model Procedures for the Management of Land Contamination (CLR11) etc..

Regards

Lucy Kirk

Lucy Kirk

Environmental Protection Team Leader

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Medway Council Local Plans
Gun Wharf
Chatham
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3rd April 2017

Dear Catherine,

Local Plan Consultation

The Medway Countryside Forum has discussed the documents relating to the Consultation and believe that the housing developments should concentrate on the Urban areas with as little reliance on rural development, other than perhaps enlarging Village Envelopes, as possible.

The documents often state the need to protect the Natural environment but go on to encourage developments which will have detrimental effects on Specially designated areas, especially on the Hoo-Peninsular

We note that the only figures mentioned are the total housing requirement and the reduction of 2000 dwellings on Lodge Hill during the plan period. The documents do not say if these dwellings are to be carried forward into the next plan period. Regardless of this we believe that Lodge Hill inquiry will find against development and this will also affect any neighbouring areas such as Chattenden due to the need to protect the buffer area for Lodge Hill. Therefore no great reliance should be placed on large scale development on the Hoo-peninsular.

Whist some agree that employment could be re-located from Medway City estate there is great concern about the transport consequences including the difficulty young people may have in gaining employment in more isolated parts of the Towns.

The above items are those with unanimity in the Forum and individual organisations in the Forum will make their own representations regarding other matters.

[REDACTED]

Ian H Burt





Response to Medway Council Local Plan Consultation – Development Options

For the attention of the Planning Department

This is the joint response by Medway Green Party members to the Development Options stage of the Local Plan Consultation. Our membership is drawn from all wards in the Medway Council area.

Although we have produced a separate document, for ease of reference we have broadly followed the questions outlined in the online questionnaire.

Section 1 – Draft vision for Medway in 2035

Medway Green Party agrees overall with the draft vision for 2035, with some important qualifications:

1. We feel that precise population numbers should not be included in the vision. Predictions are not fool-proof and while some drivers of population growth are constant, others can be affected by changes in the political landscape and choices made by governments national and local. For example the planned building of “commuter homes” is likely to have been itself a driver of population growth on which the figures have been based. Our concern is that this will become a self-fulfilling prophesy. If provision is made for a certain number of people to live in Medway, then they will. This area is a cheap and attractive place to live, compared to nearby London. Any development delivered now will outlive the Government of the day, but ecosystems which have often been hundreds or thousands of years in the making cannot be recreated once destroyed. Medway is already well below average in its proportion of green spaces¹ in comparison to adjacent local authorities, so we cannot afford to lose more. It seems impractical to impose a figure on an individual administrative area which is likely to be unsustainable.
2. We are cautious about statements which speak of promoting economic growth for its own sake as this is so often used to trample all other considerations, including preservation of important natural environments. Our focus should be on better rather than bigger.

¹ As stated in the Issues and Options consultation document, page 66 as follows:

16.3 A local standard of 3.25ha per 1000 population is currently used as a basis for assessing the level of provision, including that which should be made in new developments. This compares to standards of 6.14ha per 1,000 people in Tonbridge and Malling, 10.1ha in Gravesham and 7.39ha in Swale.

<http://www.medway.gov.uk/PDF/Final%20Issues%20and%20Options%20Public%20Consultation%20Copy.pdf>

3. The vision ignores the economic benefits of promoting a low carbon economy, as clearly pointed out in the response by Medway Green Party to the first consultation. The statement “Medway’s growth will promote a low carbon economy” implies that the economic growth has to come first. A better vision statement would be “promotion of a low carbon economy will be central to Medway’s success”. This would be more consistent with the NPPF statements such as that local planning authorities should “*have a positive strategy to promote energy from renewable and low carbon sources*” and “*design their policies to maximise renewable and low carbon energy development...*”².
4. We hope that the use in the consultation document of the terms “university city” and “riverside city” do not suggest that the Council will seek to impose city status or a name change for the area on the people of the Medway Towns without their agreement.
5. While we particularly welcome that the vision includes a commitment to “ensure that important wildlife and heritage assets are protected”, it can be argued that this commitment has already been contradicted by the Council’s express inclusion of Lodge Hill for development in at least three of the development options.

Section 2 – Strategic objectives

With our reservations outlined in Section 1 taken into account, we broadly agree with the strategic objectives, particularly the promise to “secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development”.

However the objectives would be improved by a commitment to seek business and employment opportunities in climate change reduction, such as encouraging local production of renewable energy technologies, the insulation of existing housing stock and off-site manufacture of energy efficient homes.

It should be noted that while the strategies outlined to reduce inequalities in health are very welcome, there are other factors, such as low incomes and poor housing that also contribute to poor health outcomes.

Section 3 – Development options

Of the options presented, Option 1 would be the only one for which we could offer any support. This is for two main reasons:

1. All other options explicitly include development at Lodge Hill, which we do not support under any circumstances; and
2. It appears to represent the most sustainable option of those on offer.

² National Planning Policy Framework (NPPF) (p22)

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

We also note that the Sustainability Appraisal accompanying the consultation clearly shows Option 1 as being the one that is most likely to have positive or significant positive effects when assessed against each of the Strategic Environmental Assessment objectives. This is graphically demonstrated in the Appendix 2 Sustainability Appraisal tables by a preponderance of green in the matrix for Option 1³. The other three Options show much more neutral or negative effects.

Reasons for supporting Option 1:

We broadly support the approach described in Option 1 of making the best use of brownfield land with the building of good quality homes at higher densities near town centres close to travel hubs. This would be likely to cut down on car use and the need for provision of additional road networks and road widening, reducing the impact on green spaces as well as ensuring that communities have services and facilities close-by to suit their needs.

The development of Medway City Estate appears an attractive option and would be likely to be an improvement. However we do have concerns in relation to additional traffic pressures on already congested access roads.

This could be offset by a new river crossing for pedestrians and cyclists from Chatham Town Centre to Medway City Estate which would also connect the two areas. We hope that the new link across the river, mentioned in Option 1, would represent that described in Section 11 on Sustainable Transport: *“The introduction of a new river crossing could facilitate sustainable transport and address the restrictions that apply to pedestrians and cyclists who are unable to use the Medway Tunnel”*.

In fact one of our candidates in the 2015 General Election mooted the possibility of just such a bridge for pedestrians and cyclists from Chatham Town Centre to Medway City Estate. As part of his research he contacted Amanda Levet Architects (who designed a few of the landmark footbridges in Canary Wharf), who were open to an initial consultation to explore the feasibility of this idea.

A ferry crossing from Chatham to a new development at Medway City Estate would also be a good option and be likely to cut down on road congestion.

A downside of this Option (noted in the consultation) is that a large proportion of apartments may not meet the needs of all the sectors of population in the Medway Towns looking for homes. However considering the predicted shift in need towards one and two bedroom properties for individuals living alone, couples downsizing, and small families, together with the existing housing stock and potential for additional incremental suburban development, it is unclear why this should be an issue. There is also potential for building large apartments within high density development.

Additionally, high density homes should be built to meet or exceed Medway Council’s space specifications, particularly in main living areas. This should be adhered to whether the housing is at full market price or in the “affordable” category. It should be made clear that building at higher densities refers to building taller buildings, not skimping on space within individual apartments or on providing inadequate green “infrastructure”.

3

http://www.medway.gov.uk/pdf/APP2_SA%20Tables%20for%20Development%20Options%20and%20Policy%20Approachesfinal.pdf

Buildings should also be built to be accessible to those with disabilities, including adequate doorway width in all apartments and public areas for wheelchair access and lifts. This allows the buildings to be adaptable for many different uses.

We believe that, in addition to higher density urban projects, each existing residential location throughout the Medway Council area could take a proportionate amount of additional development but this should be on a relatively small scale.

Aspects of option 1 we do not support:

We are concerned by the comment that “suburban and rural growth, including options for locations on the Hoo peninsula” would make up the identified shortfall of 7000 homes and hope that this does not represent the inclusion of substantial development at Lodge Hill.

We are concerned that Medway City Estate lies within either flood zones 2 or 3 [7.20] and attention must also be paid to flood risk in other riverside locations.

We would be cautious about development at Mill Hill. Though it appears a good idea to move Gillingham Football Club to a larger site, the Mill Hill site, as with many others suggested within the four Options, has not been deemed “suitable” in the SLAA. There has also been a lot of local objection to development at this site.

Reasons for not supporting Option 2:

In addition to objection to the development of Lodge Hill we would also be concerned about any review of the Green Belt, and that farmers may be encouraged to sell valuable agricultural land. Much of the land referred to appears to be Grade 1 or 2 agricultural land which is of the highest quality. It is likely that for this reason much of the proposed land around Capstone Valley, Rainham and Strood has been deemed “unsuitable” in relation to sustainability standards on the SLAA. Development of this valuable green space would be of great loss to the neighbouring areas as well as reducing the potential for self-sufficiency, protecting future generations and supporting the rural economy. In this respect the recent decision of the Government planning inspector to permit 450 houses to be built at Gibraltar Farm is very unfortunate and sets a bad precedent for other areas. We feel that the Local Plan should focus on brownfield land which has met the suitability criteria.

Reasons for not supporting Option 3:

We are concerned about the extent of development proposed on the Hoo Peninsula generally including Lodge Hill. Much of the proposed land for development appears to be Grade 1 agricultural land, the best and most versatile form of agricultural land, and should not be developed for the reasons stated above in relation to Option 2.

Lodge Hill:

Inclusion of the Lodge Hill site for potential development is in direct contradiction to the draft Vision statement which states that the Council would “*ensure that important wildlife and heritage assets are protected*” and also the statement [Policy Approach: Securing Strong Green Infrastructure, p65] that “a high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest”.

Further inconsistency appears to be demonstrated in the Strategic Land Availability Assessment (SLAA), January 2017, cited as part of Medway Council’s evidence base. In keeping with the methodology outlined in the document the proposed site at Lodge Hill should have been screened out at Stage 3 of the screening process due to its SSSI

designation. However it has not been included in the list of sites screened out for this reason and no explanation is provided for this. NPPF guidelines state that:

“...proposed development on land within or outside 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 Interest.”⁴

According to the RSPB, “40% of the SSSI [at Lodge Hill] (including 80% of all the nightingale territories) would be destroyed if the development goes ahead. The remainder would be fragmented and compromised by all the development around it”. Alongside this, development within or around the SSSI at Lodge Hill would set a dangerous precedent for other SSSIs across the country.

Since the impacts of development are likely to destroy the features that warrant its SSSI designation, as well as affecting the preservation of other SSSIs, it is difficult to see what the benefits of going ahead with development at Lodge Hill might be. Housing can and should be provided in other locations, whether in the Medway Towns or elsewhere. Additionally, as the Lodge Hill site is an out of town location, development there would require additional road infrastructure. It is very difficult to imagine where that could go without causing further environmental damage and loss.

Despite this, we understand that Medway Council continue to support the development of 3000 homes and associated infrastructure there during the Local Plan period and a further 2000 homes following this period.

Medway Green Party remains against development of this area.

Reasons for supporting Option 4:

As there are no easy, quick fix options, in principle we support the idea of offering a combination of solutions.

Reasons for not supporting Option 4:

Despite the suggestion that this is a mixture of options, the Hoo peninsula is still expected to take the majority of housing pressure with 6500 homes at Hoo and 3000 at Lodge Hill. We believe that development should be proportionate to existing development throughout the Medway Council area. The developments proposed at Hoo and Lodge Hill are not proportionate. It would be good to see a Local Plan that included a real alternative to major development at Lodge Hill and greater balance in development.

In comparison to Option 1, Option 4 reduces the potential for high density development from 10,500 to 6,500. Medway Green Party believe that good quality high density housing around travel hubs is the most sustainable option and, given the extent of homes needed, the Local Plan should encourage this area to be developed to its full potential. We also support development of Medway City Estate with gradual movement of employment areas away from the area. Option 4 appears to be limiting this opportunity.

⁴ National Planning Policy Framework (NPPF) (p27/28)

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

An alternative sustainable development option from Medway Green Party:

Rather than taking a numbers first approach, the Council would begin by putting a hard line around public green areas, SSSIs and other protected sites, farmland, woodland, open spaces and areas of special biodiversity and not permit development in these under any circumstances.

The Council would then work within these environmental limitations to provide the best possible solution in the circumstances, bearing in mind that the population will probably expand. This is likely to lead to the Council needing to look outside the “business as usual approach” and to explore options such as making empty homes and offices available for housing and building in the space above car parks and existing buildings, all of which are recommended in the new Government Housing White Paper⁵. In addition to this the council should be mindful that large houses that are currently under-occupied may come up for sale during the plan period. These properties could be converted into several smaller accommodations. The existing development options do not appear to take into account potential better use of the existing housing stock in Medway. It is also important to factor into plans things which may not currently be taken into account in determining housing needs, such as infill developments and loft conversions or extensions to existing homes.

Finer details of this approach are as follows:

- If not already done by the Council, as early as possible during the plan period:
 - Every brownfield site would be recorded and assessed for its bio-diversity and environmental value and publicized.
 - Every piece of under-used land will be recorded and assessed for its development potential and publicized.
 - Every vacant or under-utilized building will be recorded and assessed for their development potential and publicized.
- The Council would appoint a senior planning officer to offer pre-application advice on the local plan criteria to potential developers with a short time limit for a site visit and a further short time limit for the written assessment. Failure to meet the time constraint would result in a refund of the fee.
- The first component of this alternative option for development would then be to focus on the regeneration of Chatham as a dense urban centre and the redevelopment of the Medway City Estate area as a mixed development, while using the urban section of the river to its maximum potential. This would represent the regeneration area under our Plan.
- The emphasis would be on a mixed development of residential, business and retail in Chatham with light industrial added to the same mix in the Medway City Estate area.

⁵ Taken from Government White Paper (2017) “Fixing our broken housing market” (P32) as follows: “address the particular scope for higher-density housing in urban locations that are well served by public transport (such as around many railway stations); that provide scope to replace or build over low-density uses (such as retail warehouses, lock-ups and car parks); or where buildings can be extended upwards by using the ‘airspace’ above them;”

- The River Medway, from the Rochester/Strood railway bridge to the Council Offices in Chatham would be used to accommodate people living on the river in houseboats with proper services installed.
- In the first phase Medway City Estate and Chatham will be connected by a ferry service from Sun Pier.
- In later phases pedestrian and cycle bridges will be built at key locations, for example from the Council Offices to the Medway City Estate.
- The riverside site in Chatham will be divided into at least three sites to create a sustainable high density development.
- Redevelopment of the Pentagon would be considered as a priority.
- All existing and new car parks will be built above and used primarily for housing.
- All major developments would be initiated via a design competition with the emphasis on sustainability and the environmental credentials of the proposals.

Within the plan period there is a need for 1281 homes per annum. Of these, according to the consultation documents, 58% of the total (744 each year) should be affordable and the Plan would be based around this requirement. A small proportion of the homes required each year could be built outside the regeneration area outlined above, in other parts of Medway, but this would be on a percentage basis of the existing housing stock. For example, if 250 of the homes required each year were built outside the regeneration area, this would represent approximately 2 for every 1000 existing homes, creating a development percentage of 0.20%.

Homes built outside the regeneration area would be built on small sites, with priority given to self-build, cooperative ownership and small local contractors. Large developers and volume house builders would be excluded from the areas outside of the regeneration area to limit inward migration from London and maximise the benefits to the local economy.

Predictions of growth in the Medway Towns are from a high baseline with the population figures in Medway already high in comparison to neighbouring areas⁶. It is therefore unsurprising that predicted figures will be high. Ultimately it is unrealistic to expect individual administrative areas to expand in line with predicted populations when those populations are likely to be better served by adjacent areas, or other areas in the country, that are less populated and congested and have a higher ratio per person of green spaces.

We would urge the Council, in addition to considering the above alternative option, to make a case against over-expansion in the Medway Towns, rather than simply falling in line with unrealistic and damaging expectations. While the consultation document notes the “duty to cooperate” in relation to cross boundary projects, there is also a clear avenue for seeking cooperation with adjacent local authorities in relation to lack of land availability for predicted need, which is set out in the new Government Housing White Paper. We would urge Medway Council to explore this option in light of the low proportion of green spaces per 1000 people in Medway, rather than allowing greenfield land to be built on.

⁶ Taken from Strategic Market Housing Assessment (2015) as follows: “Based on the 2011 population level, Medway makes up the largest proportion of the population in the wider HMA, at 34%” – Housing Market Area (HMA) has been identified as consisting of Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling) <http://www.medway.gov.uk/pdf/Medway%20SHMA%20Final%20Report.pdf> (p42)

Section 4 – Housing

Policy approach for housing delivery:

While we broadly agree with the need to plan ahead and create sustainable communities with adequate infrastructure and service provision, we disagree with a policy approach that focuses on numbers. Truly sustainable communities also need green spaces and clean air as this is so important to health and well-being.

We do, however, agree that a Local Plan should be produced which focuses on making Medway the best that it can be. We note that in section 7.2 the statement is made that “The new Local Plan will seek to strengthen the condition of the local environment, and respect the need to live within the earth’s environmental limits” – an important statement which we hope the Council genuinely believes in.

Policy approach for housing mix:

We broadly agree with the policy approach.

We agree that a sufficient range of sustainable housing options should be produced, support a mixture of tenures, and note that the preferred option is for good sized two bedroom properties, which would be consistent with Option 1 of the development options. This option would also be supported by the analysis that there has been a rise in single person and small households.

We like that the Council has stipulated that consideration is needed of those on the council house waiting list and that provision of affordable housing be discussed with the Council’s Housing Strategy team, but feel that the focus is still too much geared towards market housing with little or no provision for social rentable homes. Medway has been noted to have the biggest shortfall in social rentable property in the country (Housing Measures Summary Analysis Report, Office of National Statistics, 2015⁷). This consultation document fails to address that. It is of note that there is no mention of the Council building social homes and no mention of working collaboratively with MHS homes to increase the provision of social homes. This is surprising given they are currently a major provider in the area. If the option was available, many people may prefer to rent Council Homes given the lack of security provided by private landlords.

We agree to developers giving consideration to custom and self-built plots, but we would like to see the Council offering encouragement to cooperative building projects including providing support to Community Land Trusts. Support also needs to be included for encouraging off-site built eco efficient homes which can be enshrined in the Local Plan’s economic policy.

⁷ Taken from Housing Summary Measures Analysis, Office for National Statistics, 2016 - chapter 17

"In 2015, the 3 areas with the largest shortfall in social housing were Medway, Fylde and Isle of Wight (236% of social housing stock, 145% and 125% respectively). This means that the social housing shortfall in Medway was more than double the social housing stock for Medway in 2015".

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/housingsummarymeasuresanalysis/2015#social-housing-stock>

Policy approach for affordable housing and starter homes:

We disagree with the policy approach.

While we agree that the Council should make provision in the Local Plan for affordable housing in line with the evidenced need of the area, it appears that the Council are limiting their ambition to achieve this by over-reliance on private developers.

The identified need for 17,112 'affordable' homes⁸ represents nearly 59% of the 29,463 being planned for. Thus if, as stated in the consultation, no more than 25% of the eventual mix will be of an affordable type, this would fail to meet the needs of many residents and would be likely to lead to needless expansion of the built-up Medway Towns area, resulting in at least 9,000 homes being built which don't meet the needs of the local population.

There is also a need for clarity on what "affordable" actually means. For example, many of the two bedroom flats being built at Victory Pier currently are more expensive than the existing local terraced housing stock, even with a 20 per cent discount, and so continue to be out of reach for the majority of young people seeking their first home.

As mentioned above in our response on housing mix, there is no mention of providing social housing or of working with MHS homes to ensure that the provision is increased.

A change in national government policy towards, for example, allowing Local Authorities to borrow more so that they can build more Council homes, could happen within the plan period and this possibility needs to be taken into account.

The Council should also state their support for Community Land Trusts which are community led alternatives of providing affordable housing. A description is contained within the Local Plan for East Cambridgeshire (p40) as follows:

"One mechanism for delivering community-led development is a Community Land Trust (CLT). CLTs are not for profit organisations based in and run by the community, that seek to develop key community assets to help communities become stronger and more independent. The usual starting point for CLTs is the provision of affordable housing but other benefits such as community shops, pubs, allotments, gardens, play areas, orchards, workspace, and renewable energy can also be provided".⁹

Policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation:

We broadly agree with the policy approach.

⁸ See section 4.11 of the consultation document.

⁹ As an example, support for this form of provision is included in Policy Growth 6 – Community Led Development of the East Cambridgeshire Local Plan, Adopted April 2015:

https://www.eastcambs.gov.uk/sites/default/files/Local%20Plan%20April%202015%20-%20front%20cover%20and%20inside%20front%20cover_0.pdf p41

Additional information is included on their website. <https://www.eastcambs.gov.uk/housing/community-land-trusts>

We appreciate that older people prefer to continue to live in their own homes with adaptations and community care if necessary – though this needs to be sufficient. At present this is not the case and improvements in social care need to be made.

The aim to “improve flexibility of accommodation” should also include schemes that allow older people to convert their existing homes into smaller units which would make better use of the existing housing stock and reduce the need for new builds.

Medway Council could address under-occupation by older people through actively encouraging the mutual exchange of homes, helping to match people who want to downsize with those who need more space, and providing more homes suitable for people to downsize into, such as smaller social rented homes for older people. The Green Party do not support punitive or coercive measures such as “the bedroom tax”. Encouragement to downsize should take place in a supportive environment that is sensitive to the needs of individuals.

A key aspect of this is that older people who do wish to downsize are likely to require support in considering their options.

There seems to be an implication that as the population of over 65s will account for just over half of the predicted population growth in Medway over the next twenty years (per 4.16 of the consultation document), we need to look at providing accommodation targeted at older people. It is true that older people are likely to need a greater degree of supported accommodation than younger people and so any future plans need to be mindful of this. However, arguably this is not really growth in the population as presumably these people already exist in Medway – they do not represent an “extra” 31,000 residents but instead the number is largely made up of existing residents who have become older. In addition the majority of older people are likely to want to remain independent and will already have accommodation.

So the main growth area in housing may therefore instead be from younger people leaving home and wanting a place of their own. Older people might even free up suitable accommodation for younger people if they downsize from bigger to smaller accommodation after their children have moved out. How much of this potential exchange of existing property has been reflected in the figures used in the consultation?

Lastly, the Green Party support all cooperative forms of home and land ownership, including mutual retirement housing and specialist retirement co-housing. Like housing associations, the potential for cooperatives to serve particular needs should also be recognised, for people with mental health or learning disabilities, with substance misuse problems, the formerly homeless, ex-offenders and women fleeing domestic violence. Cooperatives have significant potential to enable such people to keep control of their lives and creating communities with mutual aid enables people to retain their independence.

Policy approach for student accommodation:

We agree with this policy approach.

Policy approach for mobile home parks:

We broadly agree with the policy approach but any new developments should be based on a fairer form of ownership such as cooperatives.

Policy approach for houseboats:

We broadly agree with this policy approach as long as the Council ensures that houseboats are well provided with appropriate services. We feel that these provide a good alternative to traditional homes within a broad mix of housing types.

Medway is well known for its clusters of houseboat dwellers in several locations along the river and is also a centre both for the construction of new houseboats and the conversion of redundant vessels into houseboats.

Houseboat living suits all ages and appeals to those who like fresh air and the unique atmosphere of the river. The vessels themselves are inexpensive. They can be built to a high standard of amenities and thermal comfort at a reasonable cost. With renewable energy features and onshore facilities they can be easily serviced and entirely non-polluting.

Due to the shortage of houses, many young people cannot afford to purchase or rent a house yet a young couple could set up home on a new purpose designed houseboat for about a third of the cost of the smallest one bedroom house or flat.

The Council could assist with promoting this option to help reduce the housing shortage in Medway by allowing more marinas to be developed close to the urban centres and by recognizing the unique contribution a well-designed and managed water based community would add to the character of the area.

Policy approach for houses of multiple occupation:

We disagree with this policy approach

We are surprised that only 350 HMOs have been identified, as our impression is that there are far more locally. While HMOs are a useful provision they need to be much better managed and regulated. Although we are in broad agreement with the measures included in the Policy Approach it fails to consider the needs of the tenants which also should be addressed.

Policy approach for self-build and custom house building:

We broadly agree with this approach and hope that the Council gives particular support to any applications for sustainable eco housing and those made by not for profit cooperatives

Policy approach for gypsy, traveller and travelling show people accommodation:

We disagree with this policy approach.

The Green Party believes that there should be a requirement for Local Authorities to provide sufficient sites for travellers and that this requirement would apply to both residential and transit sites. The Local Plan consultation appears to be using vague Government definitions to restrict provision to transit sites in contrast with their own previous evidence base. While there may be movement between transit and settled communities, the Green Party believes that authorities should not seek to impose unwanted conformity on travelling communities. We feel that any change in provision should therefore only happen in consultation with the communities concerned. It is unclear whether any consultation has taken place with the communities concerned in or around Medway at this point.

Alternative sustainable development options for housing that have not been considered

There is little offered in the proposed policy approaches on housing regarding opportunities for utilising offsite constructed houses which have much higher energy efficiency standards than traditional building. Promotion of this form of housing is central to Medway Green Party's vision for housing development in the Medway Towns, as described in our response to the previous Issues and Options consultation paper. We understand that Local Authorities up and down the country work with a few different architectural/housing designs that have materialised over the years. We would suggest that this practice is revolutionised to take in sustainable eco housing, which will ensure that Medway Council will be seen as a flagship authority in this regard. It is noted that the current UK Government is fully supportive of this type of housing, as demonstrated in the recent Housing White Paper 2017 which states:

"Industry reports suggest homes constructed offsite can be built up to 30% more quickly than traditional methods and with a potential 25% reduction in costs. They are high quality, reliable, more productive and can be highly energy efficient."

The Government has also stated in the Housing White Paper their willingness to work with Local Authorities who are "supportive of this type of manufacturing to deliver growth, provide jobs and build local housing more quickly". We would urge Medway Local Authority to take up this offer.

Perhaps offsite construction has been associated in people's minds with previous wartime emergency and other ad hoc attempts to provide quick and cheap solutions to a housing shortage. However things are different now and in these days of universal awareness of climate change and the need to reduce carbon emissions, we have already adopted improved thermal standards, but we still need to take urgent measures to reduce the embodied energy in the materials we use for construction. Off-site construction, compared to so-called traditional methods of construction, is cheaper, more efficient, less wasteful and more sympathetic to the circular economy and lends itself to the use of sustainable and renewable materials with a corresponding much reduced environmental impact.

Currently one in eight skilled construction workers, in the traditional sector, come from European Union countries. An unforeseen consequence of Britain leaving the EU is going to be an incentive for construction to use off-site manufacturing methods. Such methods when designed into the construction process are as equally suitable for large scale and high rise developments as they are for small scale residential and self-build houses.

Medway Council could promote a cheaper, more eco-friendly method of construction through the planning system and by incentives for local off-site manufacturers to flourish. Locally members of the Royal Institute of British Architects are working on proposals to develop off-site construction as one of their initiatives to find solutions to the housing crisis.

We do note that Medway Council have been reported as supporting the idea of off-site construction and recently gave planning permission for the siting of some off-site built homes at Peacock Rise in Chatham. We understand that the provider of these homes, Ene Group, have also shown interest in locating a factory in Kent. This is to be welcomed in principle as long distance transportation from Scotland of such buildings will have both cost and environmental impacts. It is however unclear whether the homes at Peacock Rise meet the highest of energy saving standards. Additionally, they remain an expensive option which may not encourage local interest. We would urge Medway Council to further explore how the off-site build option can be done more affordably, more locally and with a focus on high energy efficiency.

We would also encourage Medway Authority to illustrate support in the Local Plan for cooperative forms of housing provision, including Community Land Trusts, as indicated in our earlier responses.

Section 5 – Employment

Policy approach for economic development:

While there are a few good aspects (such as working to enhance local skills and encouraging businesses that will provide high quality local jobs) we cannot agree to the policy approach in its current format. Firstly we are unable to determine the accuracy of land needs stipulated. Secondly this approach appears to indicate that GVA would be virtually the sole determining factor in assessing planning applications. An overly restricted focus on economic growth has the risk of being costly in other areas that affect wellbeing and sustainability.

Despite the opening statement of this section that the Government is committed to “meeting the twin challenges of global competition and a low carbon future” the policy approach provides no evidence that the Council would seek a joined up strategy which combines pursuing employment opportunities with taking essential measures to address climate change as well as protecting our environment. In fact, “a business as usual” approach is taken in the consultation document that embraces employment from environmentally destructive developments such as the Lower Thames Crossing, which is likely to increase pollution and will destroy even more of our local green space.

In our response to the previous Issues and Options stage of the consultation, we identified the economic opportunities presented by encouraging off-site construction of energy efficient houses. As noted in our response above to Section 4, Housing, the UK Government is also promoting this approach and are willing to work with Local Authorities who are supportive of this type of manufacturing. We therefore urge Medway Council to explore measures to actively support this form of industry within Medway, including encouraging local education establishments to include training in architecture, engineering and technology in this area. There are also opportunities in connection with the renewable energy industry which should be exploited. It is time we stopped importing these technologies and focussed on developing the manufacturing expertise ourselves.

Additionally there are ‘Green’ jobs in retrofitting existing housing stock. This idea could be particularly taken up in relation to social housing or housing association properties, which should all be fitted with adequate insulation and solar panels. The initial investment can be recovered and additional financial resources for the Council could be achieved by the sale of any surplus energy generated to the National Grid. Additionally it should be written into planning criteria that any warehouses built in industrial areas should be fitted with roof solar panels.

We urge the Council to explore potential opportunities in this area and propose that they should include a separate section of the Local Plan that specifically addresses issues such as proactively lowering our carbon footprint.

In identifying employment land, the Council must consider that patterns are likely to change over the plan period, for instance by more people working from home. There should be

regular reviews and land not being used for employment should be allocated to other uses, including housing.

Policy approach for the rural economy:

We agree with this policy approach though feel that it should contain more detailed explanation in relation to the statement that the Council will seek to “*direct development to land of lesser agricultural land [sic] where feasible*”. It is of particular concern that perceived housing pressures will give the Council room to deem the protection of Grade 1, 2 and 3a land unfeasible, particularly as Grade 1 and 2 land has already been suggested as sites for development in three of the four development options.

Policy approach for tourism:

We broadly agree with the policy approach but have a few reservations.

While tourism has significant benefits to Medway’s economy (and the potential to provide much more), it must be recognised that it has social and environmental impacts as well as economic. Any expansion of tourism must be sustainable, keeping damage to the local environment to a minimum, benefitting the local economy and being on a scale that fits with the local community. Certain leisure pursuits are resource intensive and have greater impact on the environment so may need to be discouraged in specific locations, such as motor boating and small aircraft pleasure flights.

‘Eco’ or ‘green’ tourism has been mentioned in 5.36 as an opportunity and we would like to see this carried through more positively into the Policy Approach, provided such tourism can be done in a sustainable way. Development at Lodge Hill, which includes a SSSI plus other vital habitats for wildlife, would undermine the Council’s credibility in this area.

In thinking of tourist facilities, we would particularly like to see support given to smaller independent local providers and priority given to employment of local people. The vitality and vibrancy of Medway would be enhanced if greater encouragement was given to the local arts and music scene.

Policy approach for visitor accommodation:

We agree with the policy approach, but any proposed development must be sustainable and deliver real benefit to the local economy. We think the construction of new visitor accommodation should present a real opportunity for innovative zero-carbon design to be employed.

Alternative sustainable development options for employment that have not been considered:

A joined up solution which places environmental protection at its core would improve the local economy by providing training and jobs in:

- Renewable technologies.
- Provision of efficient, sufficient new housing – the Council should explore the possibility of encouraging businesses into Medway which produce factory built energy efficient homes. These can be produced at a cost equivalent to or less than traditional homes.
- Transforming the existing housing stock by retrofitting with energy producing and saving measures.

We also support growth in independent businesses and other community based organisations, such as co-operatives and social enterprises, which would also provide employment opportunities for local people.

Section 6 - Retail and Town Centres

We broadly agree with the policy approach, with some reservations.

We believe the days of Chatham as a significant retail destination have passed due to changes in both people's shopping habits and the strategies of retailers. Therefore we do not necessarily agree that Chatham should continue to be placed at the top of the hierarchy as the main location for retail growth. We would like to see a more even investment across all town centres, with the area allocated to retail in Chatham reduced, freeing up buildings or land for alternative uses, including residential. When the town centre has more people living there, the retail aspect may become more attractive to bigger or better shops which in turn will make Chatham a more attractive place to visit to shop.

We believe that people in the villages and other local centres within the Medway area have as much right as those in the towns to adequate public services and local shops. We would like to see the Local Plan incorporate a commitment to encouraging innovative solutions to maintaining vital local shops and services.

The policy approach states that the Council will set out policy on uses considered to be 'appropriate' in local centres. We are concerned that it is not clear who will be determining what is 'appropriate'. Any policy from the Council must not be too prescriptive. We believe that decisions on what is suitable should be taken as locally as possible.

Section 7 – Natural Environment and Green Belt

Policy approach for Strategic Access Management and Monitoring:

We broadly agree with this policy approach, but urge the Council to be proactive in protecting the habitats of the Medway, Swale and Thames estuaries. It should actively seek to prevent harmful development rather than be reconciled to accepting payments as compensation for lost or damaged habitats.

Policy approach for securing strong Green infrastructure:

We agree with this policy approach.

It recognises the need to protect important green spaces, including providing “*a high level of protection for Sites of Special Scientific Interest and Ancient Woodlands*” (although this is at odds with aspects of the development options currently proposed by the Council) and speaks of supporting access and connectivity to green spaces for any new developments and improving connectivity generally via the public rights of way network, cycle paths etc., all of which we support.

We are in favour of greening the built environment so welcome the commitment to securing strong 'green' infrastructure. We hope that the Council will apply this concept not just to new

developments but also to existing areas of Medway, opening up estates and roads that currently lack any real connection with the natural world.

Policy approach for landscape:

We agree with this policy approach.

Policy approach for flood risk:

We support the use of sustainable drainage systems. However the Council should consider other policies to reduce flood risk such as those detailed in our response to the Issues and Options stage of the consultation - we hope these will be included in the next version of the Local Plan.

Individual developments should minimise the loss of permeable surface area and increase it where possible. Where development entails a reduction of permeable surface area, it must mitigate the resulting increase in surface water runoff using Sustainable Urban Drainage Systems (SUDs). Loss of permeable surfaces in existing developments such as front and back gardens should be avoided.

The role of trees and vegetation in preventing surface water flooding must also be taken into account in planning decisions. Water sinks into soil under trees at 67 times the rate at which it sinks into soil under grass.

In rural areas, smaller areas of agriculture broken up by trees and vegetation rather than large monocultures are not only better for wildlife but also have benefits in helping to absorb surface water and prevent flooding.

Urban Forestry has been introduced into some urban areas, for example in Portland Oregon, to reduce flooding and improve the quality of surface water run-off from residential streets. The planting of trees in residential streets can also help to improve air quality.

Policy approach for air quality:

We agree that any new developments should be assessed for their potential to make air quality worse than it is already and mitigation measures should be introduced for such developments. It is noted that the Council recognises that large out of town developments which generate significant vehicle movements are amongst a list of those which are likely to contradict Air Quality Action plans. This should be taken into account when making developmental decisions. We do of course agree with measures outlined in 7.27 to reduce air pollution and CO₂ emissions. Suggested additional measures to those proposed in the Medway Council's Draft Air Quality Action Plan 2015 were both forwarded by us to the consultation regarding that Plan and included in our response to the Issues and Options consultation. We hope that "integrated transport strategies" will include these measures.

Section 8 – Built Environment

Policy approach to design:

We broadly agree with the policy approach.

We do feel that Medway Towns are already at capacity for the existing infrastructure, so wherever possible the Council should resist pressure to over-populate and over-develop the area.

For areas within the unitary authority that can and should be developed, there is an opportunity to look to the future in respect of design.

Maintaining a sense of community is essential, with sufficient open spaces provided to give breathing space and areas for recreation. The maintenance or provision of local services, with space allowed for small business to thrive also helps to give a sense of community. New developments often promise such things, but somehow developers constantly seem to fall short of providing what has been promised initially.

Vehicles and parking are a constant problem in developments and even without any increases in population innovation in parking needs to be considered. The most logical solution is to ensure that car parking in new developments is put under the buildings and that, where possible, all public car parks offer opportunity to build above them creating opportunity for further development on brownfield sites. In these situations double story car parks could also be considered.

It is also important that the impact on the local natural environment should be considered and we are surprised to see nothing specific in this policy approach about that. We would also appreciate clarification over the item concerning landscaping (third bullet point from the end), which refers to “features considered relevant/important by the Council”. We hope that such considerations will be transparent, for example by having published guidelines. As a Party we consider that decision making should take place as locally as possible and certainly local people should always have a say in any developments that will alter the landscape of their local area.

Policy approach to housing design:

We broadly agree with this policy approach.

We would like to see movement in Medway towards zero-carbon housing, although realize this will take time to achieve. However we feel that the Council should already be aiming for low-carbon, sustainable, energy efficient housing design.

Medway Green Party would hope that all new developments take Medway into the future:

1. Ensuring that the maximum roof areas are able to take advantage of solar energy by having a strong south facing aspect. Further roofs should avoid shading those of other properties to ensure that the maximum number of properties can access solar energy.
2. Ideally all new properties should have solar panels fitted as standard, but even if this is not considered economical by the developers, the roofs should be designed in such a way that future owners can easily retrofit this technology.
3. Consideration should also be given to other renewable energy technologies such as providing locations for wind turbines. As with solar, if not actually built-in then properties should be built in such a way that retrofitting could be easily considered in future.
4. High standards of thermal and sound insulation should be insisted on in all new developments. For a property to be truly affordable it needs to be affordable to run.

Homes are still being built with poor thermal insulation even though the technology available is proven to reduce heating bills, in some cases almost to zero. Sound insulation is also given scant regard by developers and yet is one of the biggest causes of friction between neighbours and within communities. Semi-detached housing and apartment developments should have much higher standards of sound insulation and, as with thermal insulation, the technology exists to make this a reality. Unfortunately it seems as if developers will not embrace these technologies unless planning regulations compel them to. Places of entertainment within communities could be much more successful if they were built with excellent sound insulation from the outset.

5. Medway Green Party would also urge that new building materials are considered in housing design that ensure a low carbon footprint for building and sustainability. A good example is the use of hempcrete for the main wall construction of buildings. Its thermal properties are excellent, it is a truly breathable material and the raw materials (hemp and lime) can be brought to site for manufacturing into a building material, reducing transport costs and possibly also the need for some large plant and machinery. It might also be possible to grow hemp locally, meaning that locally grown hemp and timber could form the backbone of all future development in Medway, not just benefiting the global environment but also creating huge benefit to the local economy. It is also worth remembering that a building constructed of hempcrete can be returned to the earth at the end of its life - it can be crushed up and spread on the fields as fertilizer. Hempcrete is also a great material for renovation and regeneration and is easier and less expensive to repair and maintain than brick and concrete. It also offers great scope for innovative visual design and buildings of character.

Policy approach to housing density:

We broadly agree with the policy approach. As we have stated in Section 3 of this response, we generally support the idea of building good quality homes at higher densities near town centres and close to travel hubs.

Policy approach to heritage:

We broadly agree with the policy approach. We agree that Rochester and Chatham's historical legacy is of particular historical significance, but urge the Council not to overlook the importance of heritage properties in other areas of the Medway Towns.

We broadly support the Council's view management policy and believe that it should be key in determining the character of new developments and regeneration. The historical legacy should be enhanced by developments. However, perhaps one example of where this has not really happened is the new Rochester train station. Here a very modern looking building has been created and while it does work as a facility close to the centre of Rochester, there seems to have been little consideration of its setting in a city with buildings of a historic or more traditional design. We hope that in future a whole view of developments is considered which takes into proper account their setting.

While the historic legacy of Rochester and Chatham especially needs to be protected, it does seem that other areas are neglected. Strood is a good example, where much of the centre has been developed with no reference to its own historic legacy or the character on the Rochester side of the river. Regeneration here needs to reflect Rochester in character (but not copy). Perhaps the character of buildings in a re-developed Strood centre could embrace our proposals for new building materials and renewable energy access, making it

an example of modern urban development with sweeping south facing roofs featuring solar panels and properties that cost little to run and maintain.

Section 9 – Health and Community

Policy approach - reduce health inequalities:

We broadly agree with the overall aims of the policy approach to reduce health inequalities and prevent the development of health problems. However we feel that the specific measures suggested are rather limited in scope and hope that the Council truly recognises and is ambitious in addressing the multifaceted challenges to good health.

We support the Council's plan to consider the needs of those with dementia and other different groups in the community, such as those with physical and learning difficulties. The recognition that community/adult social care includes groups other than the over 65s needs more emphasis generally and within the Local Plan. It is anticipated that the Council will continue to develop appropriate plans in consultation with Service Users and Service Providers.

Policy approach - healthy food environment:

While this is important it is just one contributing factor and it is hoped that the Council's policy approach will truly be multifaceted and address the many challenges to quality of life. The Green Party believe that health for individuals is only possible in the context of a healthy environment and society. A healthy society is one which guarantees a safe and clean environment; material security for all its citizens; good work; adequate housing; a balanced and unpolluted diet and clean water; appropriate education; a safe transport system; accessible and sensitive public services; equality of opportunity; and a secure present and hope for the future. Medway Council needs to recognise and include measures in its Local Plan to address all of these issues.

Policy approach - Medway Maritime Hospital and Healthcare Provision:

We believe that it should always be considered whether services currently offered in or by hospitals could be transferred to the community and we would support the provision of accessible, local community health centres that provide a wide range of services, including out-of-hours care, but feel these should be to help people access healthcare quickly and easily rather than being a replacement for GPs. Community care has often been used as a cost cutting exercise which is inadequately resourced and as a result provides inadequate care and support and this must be avoided.

It is noted that Medway Council and Kent County Council ('KCC') drafted a Sustainability and Transformation Plan ('STP') in October 2016. It would have been useful to have details of these plans highlighted in this consultation. It is understood that Medway Council are currently evaluating responses to the STC draft and that there will be further consultation in the summer of 2017. It has been reported in the national press (Tuesday 14th February 2017) that Medway Council and KCC have made plans which include:

- 10 per cent reduction in hospital beds, equivalent to 300 beds by 2020-21.
- Trauma and maternity to be located at a single acute hospital with A & E and planned care at two hospitals.

- Services including vascular, renal, urology and hyper-acute stroke care to be moved to a single site.

Clarity on these plans would be appreciated. While we support integrated delivery of services and increased community provision, we do not support hospital closures to finance these changes. We do not support centralised services if it means that patients need to travel further distances to access necessary outpatient or inpatient care. A better approach is outreach services from central bases within local hospitals. Centralising services has the risk of impacting the most vulnerable members of our society, such as low income groups who cannot afford travel costs. As an example, the closure of 'A' block at Medway Maritime Hospital has been reported by a local volunteer to have had an impact on rising numbers of street homelessness in Medway, as people with mental health conditions have been unable to access support locally when they are in crisis.

We would urge that Medway Council, as part of the Kent and Medway STP team, is thorough in investigating the full potential impact of changes before making them and that they ensure that any changes will not lead to further loss of access to vital services within Medway.

It is very good news that Medway Maritime Hospital has been taken out of special measures recently and we trust that everything will be done to support the Trust in furthering improvements. It is anticipated that the Council will continue to update the public regarding future plans for Medway Maritime Hospital.

Neighbourhood plans:

We agree with this policy approach as we support the principle of subsidiarity, that is, decisions should be made as close as possible to those they affect. However the policy approach would benefit from greater clarity on the processes and criteria that will apply, particularly in regard to how much influence decisions made in Neighbourhood Plans would actually have in relation to the Local Plan and planning decisions made by Medway Council. For example it appears that Headcorn Parish Council is now struggling to have its Neighbourhood Plan recognised by Maidstone Borough Council¹⁰.

Alternative sustainable development options for health and communities:

The Green Party feel that greater investment is needed in health and social care and in our 2015 election manifesto we promised additional funding. Ultimately, the Green Party would choose to reinstate the NHS to its original model, removing the purchaser provider split and PFIs which should make it cheaper to run.

The Green Party would also provide social care that is free at the point of delivery for the over 65s and additional funding towards social care for 18-65 year olds.

We understand that local authorities are limited by national decisions but we feel that Medway Council should be more proactive and vocal in informing central government about the difficulties that are being experienced locally and in seeking additional central funding, particularly for social care. The Government should be urged to take responsibility and invest in councils, rather than pushing costs onto residents and effectively creating a postcode lottery of care.

¹⁰ http://www.downsmail.co.uk/news_sport/News/Headcorn_village_plan_rejected_by_examiner/

We believe that a substantive injection of funding is needed and support the call by Unison to use £2.4bn in unallocated business rates collected from local government to provide real additional funding for social care.

We also believe that the Barker Report (Commission on the future of Health and Social Care in England)¹¹ made a significant contribution regarding possible ways forward. No doubt Medway Council is aware of the Commission's recommendations and we hope that they will take account of these in the Local Plan. There seems to be general agreement that health and social care need to deliver more integrated services. The Commission believe that the financing of future services is affordable, and note that by 2025 public expenditure on health and social care combined might reach somewhere between 11 and 12 percent of GDP, broadly comparable with current expenditure on health alone in some other countries.

Section 10 - Infrastructure

Policy approach on infrastructure (general and strategic):

We broadly agree with the policy approach.

It is important that supporting infrastructure and services must be put in place before or at the same time as any new development, not at some unspecified time in the future. This includes services and facilities promised by developers as part of their approved planning application.

As respects strategic infrastructure, while we appreciate that current or future national or regional projects may affect the Local Plan and its delivery, we urge the Council to always act in ways that best protect the interests of Medway people and the natural environment they enjoy.

Medway Green Party is on record as having opposed the proposed Lower Thames Crossing near Shorne – see Section 11 below for our further comments on this.

Policy approach on education:

We broadly agree with the policy approach.

However we are concerned that under the recent change in the Government's funding formula most schools and academies effectively face cuts in funding over the next few years. For example it is estimated that by 2020 Sir Joseph Williamson's Mathematical School in Rochester faces a cut of 12% in its annual budget by 2020 – equivalent to 12 teacher salaries – and Warren Wood Primary Academy a cut of 19%¹². Such reduced funding is likely to result in increased class sizes, a loss of staff and cuts to extra-curricular activities. With pressures like these it is difficult to see how the existing educational facilities in Medway will be able to cope with an increased population.

It is of particular concern that funding cuts could lead to reduced support for children with special educational needs.

¹¹ https://www.kingsfund.org.uk/sites/files/kf/field/field_publication_file/Commission%20Final%20%20interactive.pdf

¹² Information from www.schoolcuts.org.uk

Policy approach on community facilities:

We broadly agree with the policy approach.

We feel it is especially important to safeguard and enhance community facilities in the rural areas of Medway, especially if any incremental development is permitted in the villages on the Hoo peninsula. In order to move towards sustainability, each village needs the basic facilities for those social and cultural activities required by the local community.

The Council should actively encourage and support innovative solutions to maintain vital local services if necessary, such as post offices being relocated into village shops or pubs, or churches doubling up as community meeting rooms.

We are concerned that paragraph 10.17 of the consultation document implies that it has already been decided that there will be large developments extending the boundaries of existing villages. Medway Green Party believes that any additional development allowed to villages in the Medway area should be incremental only, and limited to a very small percentage of the existing housing stock there. Our objections to large developments in the Medway countryside that seek to establish a new town such as Lodge Hill are noted elsewhere in our response.

Policy approach on communications infrastructure:

We agree with the policy approach, but would also like to see a firm commitment to treat the rural and urban areas of Medway equally when it comes to communications infrastructure, for example by ensuring that high-speed broadband will be available to those living in the rural parts of Medway at the same cost and speed as to those based in the town centres.

Policy approach on open space & sports facilities:

We broadly agree with the policy approach.

We believe that all existing open spaces should be protected and if possible enhanced. Wherever feasible, new developments should be required to include on-site open space provision which is carefully planned and managed to protect and encourage wildlife, forming part of an enhanced, linked green infrastructure throughout the Medway Towns.

We are not opposed to the idea of Gillingham Football Club moving its ground away from Priestfield Stadium. However as noted in Section 3 of this response we are cautious about development at the Mill Hill site. The Green Party seeks to treat all farmland and open country as environmentally sensitive, to be protected appropriately. Whatever site is eventually chosen for a new stadium complex, it must be easily accessible by train and other public transport to minimise car use.

Policy approach on utilities

We broadly agree with the policy approach.

However we notice that there is no mention in the policy approach of demand management. An alternative to expanding facilities is to reduce demand. We believe that Medway Council should take a lead in encouraging and supporting measures to reduce energy usage and water use, such as the installation of solar panels, home insulation programmes and reusing treated wastewater.

See also our comments in relation to Energy in Section 12.

Policy approach: implementation and delivery

We broadly agree with the policy approach but do have reservations:

It is important that the Council acts firmly in relation to developer contributions, which should not be used as a means for the developer to avoid providing infrastructure needed to make a development sustainable. Where contributions are agreed these should be a true reflection of the costs associated with the development – not just those associated with providing physical infrastructure but also those that reflect such things as any lost environment.

The demonstration of ‘viability’ should apply to any development, not just those regarded as ‘significant’ (who decides that, and on what basis?), and ideally should be replaced by a demonstration of ‘sustainability’.

We note that paragraph 10.35 makes no mention of the Council having regard to the views of local residents in developing the strategy and producing policies for the new Local Plan. We hope this is an oversight as planning decisions should always be made at the most local practical level. The importance of proposed developments in the opinion of developers or national or regional government should always be weighed alongside the needs and expressed opinions of the local communities in the areas in which they will be sited.

Section 11 – Sustainable Transport

Policy approach for transport:

We broadly agree with the policy approach with some reservations:

We feel that the definition chosen for ‘sustainable transport’ in 11.1 misses some key features of true sustainability. For transport to be sustainable it has to both minimise harmful effects on people and the environment (rather than just having a ‘low impact’) and minimise the depletion of natural resources (not mentioned at all in 11.1), and as a result can be sustained in the long term. A particular omission from the definition in the consultation document is any reference to minimising harm to human health, despite it being recognised that certain areas of the Medway Towns already suffer significant levels of air pollution and traffic noise. It is good to see a reference in the Policy Approach to improving air quality as a result of vehicle emissions but we would like to see a greater emphasis placed on this with a firm commitment made to an overall reduction in emissions, even taking into account the planned growth.

One alternative approach, originating from the EU, defines a sustainable transportation system as one that:

- allows the basic access and development needs of individuals, companies and society to be met safely and in a manner consistent with human and ecosystem health, and promotes equity within and between successive generations;
- is affordable, operates fairly and efficiently, offers a choice of transport mode, and supports a competitive economy, as well as balanced regional development;
- limits emissions and waste within the planet’s ability to absorb them, uses renewable resources at or below their rates of generation, and uses non-renewable resources at or below the rates of development of renewable substitutes, while minimizing the impact on the use of land and the generation of noise.

Very few of these features of 'sustainable transport' are incorporated in the simplistic definition in 11.1.

If sustainable transport truly is the aim in the Local Plan, then we feel that in planning priority should be clearly given to certain forms of transport over others. Walking and cycling should come first, followed by public transport, then taxis and light goods vehicles, cars and lastly HGVs. We would like to see both the Local Plan and the future three-year implementation plans for Medway's Local Transport Plan clearly reflect this hierarchy, for example by pedestrian and cycling routes and bus lanes being given priority. While public funds would best be spent on the forms of travel at the top of the hierarchy, we recognise that many people will prefer to use cars (or will need to as no other method of transport is available). We therefore urge the Council to be pro-active in supporting electric or hybrid vehicles as a valid alternative to petrol or diesel cars. Electric cars are likely to grow in popularity over the plan period and could potentially replace petrol or diesel cars in the near future, given adequate infrastructure. The Council should work with developers (both commercial and residential), employers and green energy providers to ensure that adequate infrastructure for recharging electric cars is provided where car parking is available, both for current and predicted future need. The Council should also be alert to the possibilities and implications of other types of vehicles that may become commercially available, such as hydrogen cell cars and autonomous vehicles.

It is also important that the peripheral and rural areas of the Medway Towns are not overlooked or neglected. While providing sustainable transport options for such areas may be more difficult than for urban or suburban areas, it should not be regarded as impossible, especially if incremental development is permitted there. Any new housing developments in the countryside should fully recognise the potential transport needs of residents, providing solutions that do not rely on private car ownership.

To improve the sustainability of transport in Medway we must begin to reduce our dependence on car use and the Local Plan provides an opportunity to start this process which should not be lost. The nearly 30,000 homes proposed in the Plan could easily mean 50,000 extra vehicles on Medway's roads and probably many more. We would like to see the Council taking measures to reduce car traffic in the urban areas of the Medway Towns, such as improving public transport options and reducing the need to travel by creating mixed-use urban developments, as discussed in Section 3 of this response.

Public transport in Medway is inadequate. While we recognise that the Council currently has limited control over the operation of privatised bus or train services, we would like to see a firm commitment in the Local Plan that the Council will do whatever they can to improve such services and make them more accessible to all users. This could, for example, include the subsidising of vital rural bus services or ensuring free bus travel for school students.

Lastly Medway Green Party was opposed to the proposed Lower Thames Crossing near Shorne ('Option C'). We were disappointed when Medway Council expressed their support for this Option and even more so when the Government announced that it had been chosen. It is likely to impact negatively on areas such as Strood, Frindsbury and Wainscott, bringing increased local traffic and air pollution, as well as causing irreparable harm to the environment. Now that the decision has been made to pursue this Option for the Crossing, we urge the Council to make a firm commitment in the Local Plan that they will work actively to minimise and mitigate the impacts of the project, both during its construction phase and when operational, particularly through the prevention of 'rat runs' on local roads and infill development between the Crossing site and the Medway Towns.

Policy approach for transport and the River Medway:

We broadly agree with the policy approach and believe that the River Medway is an asset that is currently under-utilised. In particular we would like to see:

1. A firm commitment to introducing a river taxi service to connect the whole of the Unitary Authority area, from Halling to the Riverside Country Park. Water transport can be energy efficient with a low environmental impact. It could be used to help take traffic off the roads by making transport within the Towns easier, particularly if fully integrated with accessible and affordable bus and train services.
2. More and better facilities and infrastructure for permanently moored houseboats. When considering how to accommodate new homes in the Medway Towns the river should not be overlooked as a possible development area.

We welcome the commitment to addressing the loss of intertidal habitats and to supporting measures to protect and enhance the river as a resource for wildlife and biodiversity.

Policy approach for waterfronts and river access:

We broadly agree with the policy approach.

We like the idea of a new river crossing, but hope this will be for the use of pedestrians and cyclists only. It should form part of improved car free accessibility for all people to the whole of the riverfront. While appropriate development along the river should be encouraged this should not be at the expense of public access – for example there should be no gated communities that deny the people of Medway access to their River.

Policy approach for marinas and moorings:

We broadly agree with the policy approach.

Section 11.19 concerns us slightly. We believe there should be scope on the River for both marina berthing and residential houseboat moorings. The section on houseboats under “Housing” (4.41 and 4.42) suggests that the Council will look more favourably on new marinas than proposed sites for residential houseboats.

Policy approach for aviation:

We disagree with the policy approach.

Medway Green Party questions the continuing need for an airport in the Medway Towns. We do however recognise that the Council approved the Rochester Airport Masterplan in 2014 and so, as things currently stand, that document will be used to provide guidance on the future development of the site.

We do welcome the statement in section 11.22 that there are no plans to transform Rochester Airport into a commercial airport. We would also be happy for the establishment at the site of an enhanced base for the Air Ambulance service, as has recently been proposed.

However it does concern us that the consultation document suggests that there will be some expansion of operations at the site. The aim stated in the ‘Policy Approach’ of providing an ‘enhanced aviation facility’ certainly needs further clarification as to what this means in practice in terms of any increase in aircraft movements. While section 2.23 of the

Masterplan suggests that a restriction on the number of movements is likely to be imposed, which is positive, the initial limit suggested is 38,000 per annum, which is about 20% more than the average number of movements over the previous ten years. We consider that this would represent a significant increase in flights to and from the Airport.

With the exception of increased use by the Air Ambulance, we oppose the expansion of aircraft operations at Rochester Airport. While the aircraft that will be using the facility are relatively small, they will still be sources of pollutants, including carbon dioxide, carbon monoxide, carcinogenic particles and noise. Such emissions can cause damage to the natural environment and have serious effects on human health.

Policy approach for vehicle parking:

We broadly agree with the policy approach.

As stated in the consultation document, the imposition of parking standards should be used to manage the local road network and promote sustainable transport. Planning rules should be used to reduce the requirements for car parking. All developers must be required to show how their development can be fully accessed by more sustainable modes of transport than cars. Any development that potentially encourages a large number of journeys must only be permitted in a location accessible to a wide range of public transport.

The Council should also be prepared to seek to support or create totally car-free developments wherever feasible.

According to the last paragraph of the policy approach, the Council may be seeking to increase the quantity of parking in town centres. This should not detract from the establishment and maintenance of 'Park and Ride' facilities to take traffic away from the town centres. Additionally any large scale surface car parking should only be permitted with the building of homes above to maximise the use of the space.

Policy approach for cycle parking:

We agree with the policy approach.

Policy approach for connectivity:

We broadly agree with the policy approach.

New building developments and road systems should be designed in accordance with the hierarchy we set out near the start of our response on this Section, i.e. with priority given to pedestrians and cyclists, followed by public transport and so on. Such new developments/systems should provide:

1. convenient, safe and pleasant access for pedestrians and cyclists;
2. convenient and safe access to affordable public transport;
3. measures to control dangerous and unsociable driving, especially speeding.

We would also like to see existing road systems adapted in a similar way wherever possible.

Alternative sustainable development options for sustainable transport that have not been considered:

We have already mentioned some ideas in relation to the previous headings, however we also suggest:

- restricting urban growth to 'corridors of growth' along key transport routes;
- provision of so-called 'Boris Bikes';
- other active encouragement of the use of cycles, for example by having bike festivals, investing in cycle lanes and supporting other projects which promote cycling;
- greater use of 20 mph zones;
- conversion of all Council-owned vehicles to hybrid or electric-power;
- promoting and supporting car sharing schemes for areas poorly served by public transport;
- ensuring no-one in Medway lives more than ten minutes' walk from a bus stop.

Section 12 – Minerals and Energy

Policy approach for minerals planning:

We broadly agree with the policy approach.

It is important to note that sand and gravel are not renewable resources, so it is questionable how their production and distribution could ever be described as 'sustainable'. The Green Party would generally like to see more movement towards the use of alternative materials in construction, with the aim of reducing the amount of non-renewable natural resources that need to be removed from the Earth. We must learn to do more with less and make better use of re-use and recycling when planning the built environment.

However we do recognise the current importance of the minerals industry to the local economy. We welcome the intention to promote the transportation of minerals by rail or water instead of road and hope that the Council will be very active in this promotion. We also support the greater use of facilities supplying secondary and recycled aggregates as an alternative to the extraction of new.

Policy approach on waste planning:

We broadly agree with the policy approach.

We note that municipal waste is handled under a contract that does not expire until 2035, so is outside the scope of this Local Plan.

We agree with the aim for zero waste and hope that the Waste Framework Directive will not be thrown out when we leave the EU. While zero waste has to be the ultimate aim for the sake of Medway and the planet, the immediate priorities for waste management should be to avoid or reduce unnecessary waste in the first place and to maximise the efficient reuse, recycling and composting or digestion of any waste produced. Improving waste management may avoid the need for additional landfill sites totally, even with possible population growth.

We recognise that the proportion of household waste in Medway sent for reuse, recycling or composting (2015/16 financial year) increased to 42.7%¹³, but the figure two years before was 41.2% - an increase of just 1.5% in two years is nowhere near enough.

We would like to see the Local Plan set out a clear hierarchy of waste treatment, with reuse first, followed by recycling/composting, then treating any residual waste in non-polluting ways that produce useful products like biogas. There should be very little left destined for landfill.

It is especially important that all new developments have adequate provision for the storage and collection of waste. One of the biggest obstacles to reducing waste is changing the behaviour of householders and businesses. We believe that it is the Council's responsibility both to educate people on how to reduce waste and to reuse, recycle or compost, and to make things as easy as possible for them to do this.

We would like to see the current recycling rates in Medway raised to at least 65%, which is in keeping with current UK flagship local authorities. Medway Council has the power to keep perishable waste from landfills. The current system, which generally works well, utilising brown bins for recycling perishable goods and white and blue boxes or bags to separate paper and plastics, should be able to negate the need to use black bags.

Other initiatives may help too. For example black bags are used to send waste such as nappies and cat waste to landfill. The Council could highlight the deceptive advertising by multi-national companies that disposable nappies are good for the environment. In practice, they take years to disintegrate on landfill sites. The Council could also more actively promote their own advice which is to use disposable nappy liners, which can then be flushed down the toilet. Similarly, they could advise people to bury cat waste in their gardens (provided that the garden is child free and pregnant women are made aware of the toxic hazards associated with cat waste).

Policy Approach on Energy:

The policy approach on energy has been split under two headings - "Conventional Energy" and "Renewable & Low Carbon Technology".

(1) Policy Approach - [Conventional] Energy:

The Green Party believes that action on climate change must be prioritised by Government at all levels, including through a rapid transition to a zero-carbon sustainable economy. This will include phasing out fossil-fuel based energy generation. Because of this we do not agree with the Policy Approach for Conventional Energy, where we take the statement of support for additional new power generation to refer to additional new conventional, fossil-fuel based energy. This is inconsistent with a shift to zero carbon provision and meeting agreed climate change targets and we therefore cannot support it.

(2) Policy Approach - Renewable and Low Carbon Technologies:

While the consultation document states a commitment to reducing the carbon footprint of the Medway Towns and describes possible development opportunities associated with taking such action, this is not reflected in the policy section which concentrates too much on perceived negative features of this form of energy provision. There is no indication that the Council will positively promote this form of energy such as through R&D activities, unlike with

¹³ <http://www.kentononline.co.uk/kent/news/kent-council-in-top-three-122274>

conventional energy. This is inconsistent with the guidance of the NPPF which states that local planning authorities should:

“have a positive strategy to promote energy from renewable and low carbon sources” and “design their policies to maximise renewable and low carbon energy development...”¹⁴.

Our previous response to the Issues and Options consultation set out how the challenges presented by the need to combat climate change also presented economic opportunities. Medway Council should be seeking to exploit such opportunities by exploring potential for both the manufacture of renewable technologies within the towns and of attracting industries that promote demand reduction such as through retrofitting and building of energy efficient homes.

Alternative sustainable development options for minerals, waste and energy that have not been considered:

1. There should be a commitment to supporting community led forms of renewable energy provision. Communities not only respond better to being included very early in the decision making processes but to being co-producers in schemes that provide energy for those communities. The benefits of this approach (including monetary savings) should be promoted at all levels.
2. The River Medway is the defining feature of our area and the consultation document indicates that the Council intends to acknowledge this in the Local Plan and to use its potential to the full. One way of using the many advantages the river offers would be to use it for district heating systems. The water in the river is a constantly renewable source of heat which can be exploited to provide a super-efficient heating system for both new and old developments close to it.

When coupled with solar power a water source heat pump can provide zero carbon emission heating at virtually zero running cost. Local expertise in this technology is available and the Council could take a lead by installing the technology into its own headquarters in Dock Road.

General comments

To finish we would like to comment on the process of the Local Plan consultation. Like many others, Medway Green Party responded to the Issues and Options stage of the consultation. We understand that the Council produced a report on all of the responses. However, although the actual individual responses were uploaded to the Council's website along with other documentation related to the consultation process, the report which analysed the public responses was not. It is therefore difficult to know how much impact the public consultation has had on the Council's subsequent decisions, particularly as responses receive only an occasional passing mention at best within this Development Options stage of the consultation.

Additionally, while it is appreciated that an evidence base is necessary this is likely to contain a set of assumptions. The large volume of reading both within the consultation

¹⁴ National Planning Policy Framework (NPPF) (p22)

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

document and the evidence base makes it difficult to thoroughly explore the basis for each policy approach. This means that the process is not particularly accessible. We would hope that accessibility has been improved by the consultation events that were held as part of the process. However one of our members reported being misinformed by a Council official hosting one of these events that there are no SSSIs in Medway. This is particularly worrying given the important status that Lodge Hill has within the process.

We hope that this is not a frequent occurrence as it would put the validity of the public consultation which has been carried out in some doubt.

While we continue to value the process of consultation, we would be grateful if the Council could clearly demonstrate that the consultation has been carried out thoroughly and show a willingness to take on board the results.

From: CATTELL, Darren (MEDWAY NHS FOUNDATION TRUST) [REDACTED]
Sent: 18 April 2017 16:58
To: futuremedway
Cc: DWYER, Lesley (MEDWAY NHS FOUNDATION TRUST); ALEXANDER, Glynis (MEDWAY NHS FOUNDATION TRUST); HAMILTON-FAIRLEY, Diana (MEDWAY NHS FOUNDATION TRUST); RULE, Karen (MEDWAY NHS FOUNDATION TRUST); DEVINE, James (MEDWAY NHS FOUNDATION TRUST); DUFFY, Gemma (MEDWAY NHS FOUNDATION TRUST); CORDWELL, Mandy (MEDWAY NHS FOUNDATION TRUST); STUART, Lynne (MEDWAY NHS FOUNDATION TRUST); RICE, David (MEDWAY NHS FOUNDATION TRUST); STEVENS, Ben (MEDWAY NHS FOUNDATION TRUST); LOWELL, James (MEDWAY NHS FOUNDATION TRUST); LOWE, Claire (MEDWAY NHS FOUNDATION TRUST); DALZIEL, Margaret (MEDWAY NHS FOUNDATION TRUST); LINDSAY, Alistair (MEDWAY NHS FOUNDATION TRUST)
Subject: Local Plan - Future Medway Feedack from Medway NHS Foundation Trust
Follow Up Flag: Follow up
Flag Status: Completed

Dear Colleague,

Thank you for providing the opportunity to feedback on the consultation of the Local Plan – Future Medway.

Our overall comment is that the Consultation document is very well written and positive. It sets the right tone and provides a really helpful message to the people of Medway over the longer term.

The vision of healthy communities is one we aspire to here at the Trust where only those really sick people in need of our specialist Acute Hospital skills actually come to us for the best of Emergency or Elective care. We welcome the aim to reduce Health Inequalities which are often down to our demographics and we see the prevention agenda rather than the more traditional treatment agenda as being essential and something we can participate in.

In specific response to the document, particularly in regard to section 9;

1. We welcome a vision to reduce Health Inequalities as these often lead to long term health conditions requiring increased use of acute health services, and ultimately higher mortality rates. We specifically welcome an aim to reduce the prevalence of Smoking, Obesity and Alcohol which frequently mean an on-going need for Acute Hospital care.
2. We already recognise the increased need for Dementia services and are increasing our service provision here at the Trust. We have started to work collaboratively with Health and Social Care Partners outside the Trust to determine the most appropriate and best care Pathways for Patients with Dementia and see this continuing at scale and quickly. We also welcome the establishment of “Dementia Friendly Medway” to ensure the local infrastructure is safer and better accessible for people with Dementia.
3. Enabling a healthy lifestyle through such measures as a green, vibrant infrastructure and providing improved access to health care settings, physical activity and healthy and affordable food is something we welcome as evidence supports the reduction in usage of more specialised services in the Acute sector when the population is generally more healthy and active.
4. We welcome the ambition to embed a Health Impact Assessment in the planning process to consider the positive and negative impacts on health of any development and would suggest the Trust can play an active part in this assessment process.
5. We welcome the opportunity to take part in planning on a wider health system perspective in relation to Primary, Community, Secondary Care and Social Care particularly in how we can reduce or remove the boundaries between care providers and plan and then provide seamless and the best of care to the population. This is particularly important due to the change in workforce profile we see within Medway. This is very much in tune with the Sustainability and Transformation Partnership, in which we take an active role.

6. Medway NHS Foundation Trust has recently received an improved rating from the CQC after a number of years as being rated inadequate. We recognise there is still more to do to ensure our Patients receive the best of care however we still face a number of challenges over our finances and the increasing demand for our services. We welcome the opportunity to work together under the auspices of the STP to evolve our longer term provision of health and social care to more appropriate care settings.
7. Finally it has been recognised that the physical location of Medway Maritime Hospital needs review over the medium to long term. As demand for services has increased, access to the wide variety of services we provide can prove a challenge at a number of times in a busy day. An integrated Acute health care provider would almost certainly be located on a redeveloped if not a different site and we would welcome the opportunity to discuss this with local (Health) planners.

As ever we would be happy discuss our comments in more detail at a convenient time

Kind regards

Darren Cattell
Director of Finance
MFT

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Response to Medway Local Plan consultation from Medway Ramblers, part of the Ramblers Association

Medway Ramblers has around 300 members. We organise a regular programme of walks in Medway and surrounding areas, together with social events for our members. Our walks programme supplements the programme of Health Walks organised by Medway Council, providing a wider range of walks for people. Our walks mainly go through the countryside.

Our main plea is that the Plan should be designed to keep as many walking and countryside visiting opportunities as possible. People enjoy such access and it is good for the vitality of the area and the health of its residents. It is not just the quantity of walking opportunities but also their quality. Already we have examples in Medway of rights of way passing between high fences without views. Paths should be places that people enjoy using.

We also have two context comments:

- First the plan seems to be very inward looking. It mentions Bluewater but surprisingly not the new Lower Thames Crossing which is expected to be open by 2025, well within the period of the new Local Plan. The LTC could be both a threat and an opportunity. The threat would be around the strain on local infrastructure. But the opportunities could be on major new employment opportunities from businesses setting up new distribution centres etc close to a major new national road. To maximise this benefit would require Medway to add new local roads to the main road leading to and from the LTC. (This comment applies to all of the options for the LTC as even the roads nearer to Gravesend are still close to Medway.)
- Second the documents flag up the strain and negative impacts on health and other services. But (at least in the Executive Summary) there are no solutions offered to deal with these. Without work on road and transport services congestion will increase with an adverse impact on air quality.

Vision and Strategic Objectives

These feel to be appropriate. But we would note that they – particularly the vision – set a high bar which seems unlikely to be achieved. Will Medway really be “leading”, “revitalised” and “stunning” by “2035”.

This section references the benefits of the “river and estuary” but the rest of the document makes little reference to this. The river could be a great resource and in a sense part of the green spaces of Medway which people enjoy visiting and walking along. Making the most of this requires a quality riverside path but there are several stretches where one cannot currently walk by the water. This needs sorting – even the section past the Council Offices at Gun Wharf currently has limitations on riverside access.

Scenario preferences

Choosing between these with their advantages and disadvantages is difficult. However on balance based on our points raised above we find scenario 1 the best. This appears to provide the best protection for access to good quality countryside. Development is more compact leaving more space to enjoy. And most new housing is not too far from that space. The other options have developments more spread with a greater impact on the countryside.

Budgets

Maintenance of public rights of way and access to the countryside needs money – volunteers can help but can't do everything. Maintaining a PROW network is a statutory responsibility of local government and should be adequately funded – which is not currently the case.

Michael

20 Roebuck Road, Rochester, Kent ME1 1UD

Catherine Smith
Medway Local Plan Manager
Medway Council
Gun Wharf
Dock Road
CHATHAM ME4 4TR



Gill Ltd

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e-mail: business@michaelgillian.plus.com

22nd MARCH 2017

Dear Catherine,

**FOLLOW UP OF CONSULTATION WITH RESIDENTS/STROOD TOWN CENTRE FORUM
MEMBERS IN MARCH 2017**

We refer to the consultation that has been held Medway-wide concerning the new Draft Local Plan and, in particular, the meeting convened with Prem Velayutham-Smith at the former Strood Library in Bryant Road recently. Michael Dakers and Gillian Dalton, the joint Directors of this Company, attended and made several oral comments at that meeting. Although notes of those comments were made, we were invited to encompass them into a written representation which is constituted by this letter so that you have a copy to consider more formally.

We believe that the original time for lodging comments has been extended from 8th March to the 10th April 2017. These representations should be received by you in good time, but we would nevertheless request you to confirm receipt of this letter to us by post, or email.

Our main contention was that there was a fundamental flaw which affected consideration of the Plan in that the area defined as the Strood Town Centre under consideration was incorrectly exclusive of the Retail Park and should additionally, for the future, include the area of the former Civic Centre. Thus all figures contained in reports etc. Relating to the Town Centre that you are relying for evidence are therefore greatly incorrect. We will, however, set out our comments under separate headings and they are as follows:

A. Strategic Objectives

Although we agree that regeneration should be at the core of the Council's growth plans we cannot agree:-

- (a) That the whole of the Strood Waterfront should be a priority for residential development, particularly at the southern side of Rochester Bridge and:
- (b) The regeneration of Chatham as a prime Retail Centre is central to the success of this approach.

B. Development at Strood Esplanade

It was stated at the meeting that the former Strood Waterfront Plan, on which we had previously made representations, included a proposal for residential development on this area, i.e. the Civic Centre Car Park and site of the Civic Centre itself. This is not a sustainable suggestion since it does nothing to improve the ambience or maintain the vitality of the Strood Town Centre. It presupposes that the only appropriate use is of a residential nature.

Although that may be the case north of the bridge along Canal Road (save for the proposal for development of small craft workshops, etc. on the area immediately north of the A2 which is reasonable), the area immediately to the south where the Civic Centre Buildings lay and the car park for those former buildings, should be developed with an eye to its value to assist the growth of Strood Town Centre. Not only is the area adjacent to the Town Centre, in fact, but it is also one where it would have been sensible to have a small unit Retail Park use to provide an additional Retail element.

Part of that area (effectively in the centre) should be reserved to provide the space for a ring road/distributor road leading to and joining up with Saxon Way so as to procure a direct connection to that area, without going through the Town Centre, and thence to the M2 Motorway. We believe that this could be easily accessed off the existing A2 at the western end of Rochester Bridge with minimal difficulty, and that that junction might well be served by being converted into a roundabout. This road provision is vital to take traffic, particularly HGV'S, out of Strood Town Centre to improve, at a stroke, the ambience and quality of the Retail offer there.

The rest of the land lying to the east of this proposed new road, or the area reserved for it, should then become a public garden giving magnificent views over the river to Rochester Castle, Rochester High Street, and Esplanade, vastly improving the heritage amenity and tourist offer for this part of the Medway Towns. The rest of the land to the west of the road/proposal could then become a Retail Park of small units and Craft centres to allow for growth of Strood Town Centre there.

C. The Regeneration/Primacy of Chatham Town Centre

Ever since the Ring Road for Chatham was removed, despite the fact that it had recently been constructed as the best of several alternatives looked at lengthily in the 1980's/90's, Chatham Town Centre has reduced in retail importance and should no longer be considered a prime priority. It was fading beforehand, when Chatham Dockyard closed, but has continued to decline as is evidenced by the departure of major retail companies such as M&S, W H Smiths, Tesco and more recently Staples. Part of the reason for that lies in the wrong decision made to remove the Ring Road thus making Chatham perceived as less accessible and less attractive for people to shop in. Already too much effort and money has been spent on seeking to revive a failed centre. The arrival of Blue Water was a further blow/erosion of its effectiveness.

Strood Town Centre now provides a major weekly shopping destination for consumers living on the west side of the Borough, and incidentally partly serving Gravesend East and the villages in between. Within its Centre, and immediate edge, are:

- A very large supermarket (Morrisons),.
- Two large supermarkets (Tesco & Aldi)
- Two medium sized supermarkets (ASDA and Iceland)
- A Retail Park containing NEXT, Matalan, Argos & two "Pound" Shops
- All four major Banks
- Three Building Societies
- A large Wilkinsons and Sports Direct in the High Street
- Several other shops both independent and branches of national chains.
- A dedicated and substantial Post Office
- A Council Community Hub

All of which provides one of the best general weekly shopping destinations in the Medway Towns. Hempstead Valley to the east does not have the same offer, as a Shopping Centre, and is therefore not completely competing with Strood because it is mainly focussed on non food items and does not have the banks/other services, like Estate Agents and other Professionals, that Strood offers.

Essentially this means that Strood should certainly have much higher priority than it now appears to have, in the view of The Local Plan, and should have considerably more growth written into it. Plans should be focussed on bringing growth and improving the ambience of the Offer.

C. PROPOSALS FOR THE DEVELOPMENT OF THE NEW TOWN CENTRE

1. The extent of the Town Centre

The map shown at the Consultation to describe the extent of Stood Town Centre was the Strood Town Centre Map accompanying the Medway Towns Local Plan (Adopted version) 2003. It was probably already out of date by then, and is now certainly out of date. The area of the Centre to the south of the High Street shown on the 2003 Plan only extends to the rear of the shops fronting that side of the High Street. It took no account of the Retail Park, which is now, to all intents and purposes, an integral part of the Town Centre and connected by the important pedestrian thoroughfare through Tolgate Lane and the Commercial Road car park.

Parking for Strood is largely provided south of the High Street in and off Commercial Road. The other parking lies attached to Asda/Wilkinson and Aldi. If you asked an ordinary person in the street they would have no hesitation in saying that Strood Town Centre encompasses the High Street area together with the Retail Park.

It would naturally stretch to include the area east of the railway line between Strood and Aylesford and west of the proposed new road referred to at "A" above. That is then what

should be the area to be looked at and to be encouraged and promoted by the Local Plan as a realistic prospect for growth on the west side of the Medway Towns.

2. Comments on Chatham Town Centre

The solution to Chatham Town Centre is to allow it to find its own level. It no longer has an sustainable prime Town Centre connotation even though the main Bus Station is there. It is difficult to develop it as a cultural centre because the vast majority of culture and tourism attraction lies in Rochester. The Dockyard is too far away from the Centre and inaccessible from the south. Indeed this is why the outlet centre which is accessible just off the northern ring road/Medway Tunnel, has proved so popular and it is also near to the entrance to the Dockyard.

Perhaps it would be wiser to seek to develop the Waterfront residential housing that seems to be a principle objective of the Council at Chatham Riverside thus finding quite a large area of space to develop and provide the housing requirements for the area conveniently near to the Bus Station, and reasonably accessible to Chatham Railway Station.

D. The Chronic Problem of the Road System in Strood Town Centre

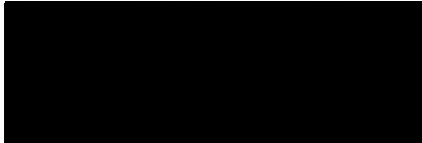
On behalf of the Strood Town Centre Forum, of which Michael Dakers was, at the time, Chairman, detailed representations were made to the previous Draft of the Local Plan, which has not been formally responded to because the Inquiry that followed consultation was unsatisfactorily inconclusive. He was also selected to give evidence at the Inquiry. The points he made remain relevant still and are referred to so that you can treat them as repeated. If you want a further copy, it should be able to be provided if requested.

Those representations are based on the fact that the A2 and the other major roads running through Strood have been the subject of considerable public discussion since **1929**. The issue was first addressed formally by the inclusion of a ring road in the 1970's Local Map, which may now be out of date, but the principle of which is still relevant. Although continued in the next Local Plan, the 2003 Local Plan failed to provide any significant provision for the road structure problems to be resolved. Therefore the problem of a major trunk road to Rochester Bridge travelling through the middle of the old Town Centre and, its returning in the opposite direction through the enhanced Town Centre, was not addressed.

This long-standing problem is something that is urgent to tackle if Strood is to retain a major and vital Town Centre. This is where effort should be directed, and proposals put forward, in the Local Plan, to resolve that problem. It will undoubtedly increase the viability and vitality of a major growth centre realistically available in the Medway Towns.

Please, as stated at the beginning of these representations, send a written acknowledgement of these comments/representations. If you wish to have a meeting to discuss it further with this Stakeholder, then we would be happy to attend, particularly as these issues raised are fairly fundamental.

Yours sincerely,

A solid black rectangular box used to redact the signature of Michael Dakers.

Michael Dakers, L.M.R.T.P.I.

Gillian Dalton

[REDACTED]

From: turnermick73 [REDACTED]
Sent: 15 March 2017 09:51
To: futuremedway
Subject: Medway plan Allhallows

Follow Up Flag: Follow up
Flag Status: Completed

Dear council

Your proposed plan for Allhallows is on farm land. We dont produce enough food in this country we should not be reduceing if further.

Also the only access to Allhallows is via a country lane. this could not cope with further trafic that then all coverges on the four Elms hill roundabout. The traffic back up to Hoo now.

There is only part time doctor/nurse at Allhallows and the nearest secondary school is Hoo which is aready vast and could not cope also the council have to pay for school busses. There would need to be more and this would be more cost.

Michael Turner

[REDACTED]

Sent from Samsung Mobile on O2