

MEDWAY LOCAL PLAN 2012-2035

REPORT ON DEVELOPMENT OPTIONS CONSULTATION 2017



1. INTRODUCTION

- 1.1 Medway Council is preparing a new Local Plan which covers the period from 2012 to 2035 and upon adoption, will replace the existing 2003 Medway Local Plan. The Local Plan aims to deliver the sustainable growth of the Medway area, providing a healthy balance of homes, jobs, services whilst maintaining and enhancing the natural and historic environment. The council is working to a plan preparation programme that will see the draft plan submitted to the Planning Inspectorate in Spring 2019 for independent Examination. Work to date has involved the collation of a broad evidence base, including assessments of development needs for housing, employment and retail uses and land availability. The council has carried out two formal rounds of consultation on emerging stages of the Local Plan. An Issues and Options document was published for consultation in January 2016, and comments were sought on a Development Options document in 2017.
- 1.2 This report provides a record of the second formal stage of consultation (Regulation 18 Development Options) undertaken in early 2017, between January and May. It outlines the consultation process and highlights the main themes emerging from the responses. The council has considered the comments made in preparing the next stage of the Local Plan preparation. Full copies of all written responses made to the consultation have been published on the council's website at: www.medway.gov.uk/futuremedway
- 1.3 The Issues and Options document presented key issues and sought confirmation that the council had correctly identified the important matters to be addressed through the new Local Plan. The main focus of the Regulation 18 Development Options document 2012-2035, was setting out the proposed broad locations for future growth within the Medway area in scenario format, and policy approaches.
- 1.4 The process of preparing the new Local Plan involved engagement with relevant statutory bodies and various stakeholders in identifying relevant issues and how these could be addressed in preparing a strategy for Medway's successful and sustainable growth. The Development Options consultation document also presented policy approaches across various themes, i.e. housing, employment, environment, design, transport, retail, minerals, waste, and community facilities.
- 1.5 The council consulted on the Development Options document from January to May 2017 to allow for comments on supporting evidence documents that were published

later than the main consultation document. The consultation was largely managed through online resources, using the council's website. Planning officers also arranged a number of consultation events to support further discussions on key issues and wider participation in the development of the new Medway Local Plan. Further details of the consultation programme are set out in section 3 of this report.

- 1.6 The responses received totalled 12,531. There were 331 'general responses' to a wide range of Local Plan issues. 11,681 responses were made specifically objecting to the proposal for development at Lodge Hill on land designated as a Site of Special Scientific Interest, in association with a campaign promoted by environmental groups, including RSPB. These responses overwhelmingly used common text provided on the RSPB website. Many of the 331 'general responses' to the consultation also made reference to Lodge Hill. Gillingham Football Club encouraged its supporters to make representations to the Development Options consultation in connection with a potential new site for the football stadium. 519 responses were received on the specific issue of Gillingham FC. Again many of these used common wording suggested by the Football Club.

- 1.7 This report concludes with information on how the Local Plan will be progressed. The information and comments provided at the Development Options stage of the preparation of the Medway Local Plan have been taken into account in drafting the Regulation 18 Development Strategy document, which will be published for consultation in March 2018.

2. COMPLIANCE WITH THE STATEMENT OF COMMUNITY INVOLVEMENT

- 2.1 The consultation carried out by the council has complied with the statutory requirements of the plan making process – under Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012. The legislation defines ‘specific’ consultation bodies that are statutory consultees, and ‘general’ consultation bodies that cover wider stakeholders and residents. The consultation design was therefore mindful of the legal requirements that it needs to satisfy.
- 2.2 Medway Council prepared its latest Statement of Community Involvement in 2014. This statutory document sets out the approaches and standards to be followed in carrying out consultation on planning matters. The SCI provides a basis for how the council will involve the community in the preparation of planning policy documents, such as the Local Plan, and how it consults on planning applications. The document covers consultation and engagement methods, who will be consulted and the role of elected councillors.
- 2.3 The Development Options consultation ran from 16th January 2017 to the 30th May 2017 and sought the involvement of a wide range of specific and general consultation bodies including; voluntary bodies, bodies representing the interests of different racial, ethnic or national groups in Medway; bodies representing the interests of disabled people in Medway and bodies representing business interests in Medway.
- 2.4 A wide range of engagement methods, compliant with the adopted 2014 SCI, were used to promote the Development Options consultation document in order to make contact with a cross-section of stakeholders, this included:
- **Email and letters** sent directly to all contacts on the Local Plan consultation database
 - All materials made available on the **Council’s website** including an **online questionnaire** (set out at Appendix 1).
 - **Reference copies** of the consultation document were available to view at the council’s offices, libraries and community hubs across Medway.
 - **Leaflets** and other **publicity documents** made available at key Council contact points across Medway, doctor’s surgeries, community centres, local shops and other community venues.
 - Officers visited train and bus stations to **hand out leaflets** and talk to people about the consultation.
 - **Social media** publicity and activities through the Council’s corporate accounts.

- **Public exhibitions** staffed by council officers in community settings throughout urban and rural Medway
- **Presentations and discussions at partnership meetings** to reach a range of sectoral and community interests
- **Thematic workshops** arranged around key issues, with invited representatives from business, community and services.

2.5 People and organisations could respond to the consultation in different ways. Written comments could be made by email, an online survey form, or postal letter. There was an online questionnaire posted on the council’s website and hard copies of the questionnaire were available at public exhibitions and Medway libraries during the consultation. Local people were most likely to use the online questionnaire. Statutory and voluntary organisations, developers and planning agents were most likely to submit their responses by email.

Use of information gathered

2.6 All written comments, information and personal contact details, submitted as part of the Development Options consultation were recorded as formal responses to this stage of preparation of the emerging Local Plan. The information was added to the consultation recording system for both documentation and analysis purposes.

2.7 Respondents contact details are held by the council in the Local Plan consultation database for the sole purpose of the Local Plan work and will not be shared with any other council services, or used for other purposes than Planning Policy. The council I retains the contact details for future Local Plan consultations, unless individuals have specifically asked the council not to.

2.8 The written representations, excluding sensitive personal contact details, have been published on the council’s website on the Planning Policy pages, as part of a formal record of plan preparation. Information will be held until an appropriate period after the adoption of the Local Plan.

3. CONSULTATION PROGRAMME

- 3.1 The council wishes to reach a broad range and cross section of organisations, businesses, and residents, and others with an interest in Medway, in preparing the content and direction of the Local Plan to ensure that it effectively considers wider views of how Medway should develop. This section outlines how the council carried out consultation on the Development Options document and the different interests contacted.

Consultation database

- 3.2 A key tool in managing consultation on planning policy documents in Medway is the Medway Local Plan consultation database. This has over 1100 contacts and has been built up over a number of years and includes contact details of a wide range of organisations and people with an interest in Medway's development. These contacts include statutory organisations, voluntary and community groups; individuals, many of whom live in Medway; businesses, developers, landowners, planning consultants and representatives of partnerships. The database covers social, economic and environmental interests. This database is regularly updated and anyone who contacts the council about the Local Plan is asked if they would like to be added to the database so they can be kept updated of work on development policy in Medway. The majority of contacts include email addresses, but there are also many postal contacts, primarily in the local community. The council used the database to send notification of the start of the Development Options consultation directly by email or letter to over 1000 organisations and people registered on the list.

Audiences/stakeholders

- 3.3 The various interests in the preparation of the Medway Local Plan can be considered under a number of broad categories:
- Elected member (councillor)
 - Statutory consultees (defined in planning legislation)
 - Developers
 - Interest, voluntary and Community Groups
 - Residents
 - The wider business community
- 3.4 Elected Member engagement is critical to ensure the democratic basis of the plan, and to input members' views and knowledge into the new Local Plan. The plan needs civic leadership and wide ownership for the vision and development strategy being promoted.

Engagement was undertaken through:

- Formal decision making – Cabinet approval for the Development Options technical consultation document
- Development Plans Advisory Group – formal structure for cross party member involvement in preparation of Local Plan.
- Briefings for members prior to the start of the consultation programme
- Invites for members to attend public exhibitions, particularly those organised in their local wards
- Updated briefings during the consultation on emerging issues.

3.5 Statutory consultees are organisations defined in legislation. The government requires certain organisations, such as Natural England and the Environment Agency, to be consulted during the preparation of planning policy. This is a technical audience that will seek opportunities to influence policy formulation in key thematic areas, and ensure that the local plan is consistent with national policy. The council sought the views of these organisations on the Development Options consultation document. Specific meetings were set up for ‘Duty to Cooperate’ discussions with neighbouring local planning authorities, and key consultees. (Further details on this specific legal requirement of plan preparation is set out in section 4). This work built on ongoing liaison with these organisations throughout the plan preparation work, and this will continue in the refinement of development allocations and policies.

3.6 The council must also work with Neighbourhood Planning Groups active in the area, to ensure coordination between the two tiers of plan making. The Planning Service has been working with the group in Cliffe and Cliffe Woods. This included work during the Development Options consultation, and a well attended public exhibition event in Cliffe.

3.7 Developers are a key sector to engage in the preparation of the local plan. Details of developers and planning agents with an interest in Medway are held on the Local Plan consultation database. The government seeks councils to work constructively with the development industry to identify potential sites and input to the preparation of policies. Developers and land owners have been asked to submit details of sites that they wish to promote for development. Planning officers carried out an assessment of these sites and presented the information in a Strategic Land Availability Assessment (SLAA), published alongside the Development Options consultation document.

3.8 Interest and Community Groups form a core set of the ‘general consultation bodies’ that councils must involve in the plan preparation process. The Local Plan

consultation database includes a number of these groups with interests in Medway. The main areas of representation cover:

- Interest groups – these include environmental and amenity groups, arts and heritage groups, and social welfare organisations; and organisations with specific interests – eg, housing associations, services and facilities.
- Community sectors – eg, young people, older people, faith communities, people with disabilities, minority ethnic communities.

In addition to use of the Local Plan database, the council organised targeted emails to partnerships and stakeholder groups, provided through corporate services and external partners. The Planning Service has worked with colleagues to speak directly to different groups through agenda slots on pre-arranged meetings, such as, young people and in organising thematic based consultation events, such as, environmental issues.

3.9 Medway’s residents are directly affected by planning and the approach taken to development in the Local Plan. The Local Plan database contains contact details for a number of residents who have asked to be kept updated on planning policy issues, and they have been directly invited to respond to the Development Options consultation. However this represents only a very small number of the local population. Strategic planning over a wide area and 20 year timeframe and the technical requirements of the local plan process can also present potential barriers to wider engagement in consultation. The council therefore sought to promote work on the Development Options consultation broadly and the public exhibitions were particularly aimed at local people.

3.10 The wider business community is important to a strong local economy, which is a key objective for the Local Plan. The Planning Service has contact details for many local and sectoral businesses, they were directly invited to respond to the consultation. In addition specific consultation events were arranged on employment and retail issues, and planning officers attended partnership meetings with businesses to discuss the Local Plan.

Communications and Notification

3.11 The consultation was largely managed through online resources and email in line with corporate communications protocol. The consultation document was available to view on the council’s website and responses could be made via email, letter response and online questionnaire. There was a strong media presence on the council’s website, with information on the front page of the website. A programme of workshops and events were held during the consultation to further encourage participation, especially of local people.

3.12 A Public Notice was placed in the Kent Messenger to alert people to the consultation. The council contacted over 1000 people on its Local Plan consultation database, which included postal letters to a number of residents who had indicated that they wanted to be kept informed of progress on planning policy matters. The Planning Service placed copies of the consultation document in public libraries and community hubs across Medway. Copies of the document were also sent to all Medway Parish Councils.

Engagement

3.13 Sixteen public exhibitions were organised as part of the consultation to broaden engagement in the Local Plan preparation work and provide residents with an opportunity to directly discuss the proposals with a Planning officer. These events were held at varying times of the week, including weekday daytimes and evenings and Saturday mornings to accommodate people's availability to attend. Further events were held on specific themes and under the specific 'Duty to Cooperate' on cross border strategic matters. The events included:

- Staffed public exhibitions across the authority in community venues
- Thematic workshops & meetings with invited technical audiences
- Duty to cooperate meetings with neighbouring Local Authorities and statutory organisations

3.14 A schedule of the public exhibition events held during the consultation is set out in Section 5. These events were held in order to share information from the consultation document to promote discussion and gather comments on how the new Local Plan should address the area's economic, social and environmental needs, seek opinion on the development options and identify areas for improvement.

3.15 Planning officers staffed exhibitions in community venues, including leisure centres, country parks and community centres across Medway, where people were able to find out more about the Local Plan and speak to officers. The council also organised a number of meetings focusing on specific themes within the consultation. These themes included issues of housing, infrastructure, education, health, employment, retail and the natural environment. These workshops provided opportunities to discuss thematic and technical issues in more detail. Further information is provided in section 5 of this report.

3.16 Officers also attended partnership meetings during the consultation to raise issues in the Local Plan and seek input to the consultation, which provided access to a diverse

range of key stakeholders in Medway, including business, housing and education providers, community and voluntary organisations.

- 3.17 Briefings were held for Medway councillors in advance of and during the consultation. A briefing session was also held for parish councils in Medway at the start of the consultation.
- 3.18 Officers visited railway stations in Medway and Chatham's Waterfront bus station to hand out flyers about the Development Options consultation and encourage people to take part and submit comments.
- 3.19 These various methods of publicising the consultation enabled a range of people to express their views and opinions on development options within Medway. Local community based publicity for workshops and exhibitions proved useful in increasing attendance. The council have made greater use of local community networks and venues as noted from the previous local plan consultation which saw great success in increasing attendance. The council also noted from the previous consultation that use of local newsletters and social media groups helps to increase awareness of the work on the Local Plan. The council welcomes further information on local contacts.

4. DUTY TO COOPERATE

- 4.1 The emerging Medway Local Plan is being prepared within the context of the National Planning Policy Framework, the Localism Act 2011 and other relevant legislation. In support of the preparation of the new Medway Local Plan the Council is committed to 'engage constructively, actively and on an ongoing basis' with other Local Planning Authorities and public bodies and services to address 'strategic matters'. This legal obligation is known as the 'Duty to Cooperate'. In particular the Duty to Cooperate requires the Council to work with neighbouring authorities, including Kent County Council, to address strategic issues that 'cross administrative boundaries' for example the provision of infrastructure or meeting housing needs.
- 4.2 The Duty to Cooperate on cross boundary strategic issues is embedded in Medway's plan making process and this duty has informed preparation of the Development Options consultation document as well as the requirement for further evidence base work.
- 4.3 Medway Council has engaged with relevant Local Authorities in collaborative evidence preparation and sharing baseline and analytical work on development needs. Meetings were held separately with each Local Authority to discuss and agree on ways forward regarding issues raised during the Issues & Options consultation, which helped to refine the content of the 'Development Options' document. Further meetings and workshops were held during preparation of the Regulation 18 Development Options document.

Consulting on Development Options

- 4.4 The council contacted all statutory consultees who represent interests on cross border strategic matters as part of the consultation on the Development Options document, seeking their comments to inform the development of the emerging Local Plan. Responses were received from neighbouring local planning authorities, statutory bodies and health, infrastructure and utilities providers.
- 4.5 Specific meetings were held with :
- Highways England
 - Network Rail
 - Environment Agency
 - Natural England
 - Historic England
 - Tonbridge and Malling Borough Council
 - Swale Borough Council

- Gravesham Borough Council
- Maidstone Borough Council
- Kent County Council
- Greater London Authority
- Homes and Communities Agency

4.6 These meetings were held to understand progress on strategic plans and evidence gathering as well as to discuss issues arising from the ‘Development Options’ document.

4.7 A few key areas for consideration emerged as a result of government’s stated intentions and ambitions for Planning and housebuilding in the Housing White Paper. Other key matters included the accommodation of unmet housing needs, higher levels of housing need, employment land, demands on existing infrastructure arising from the impacts of development, and the need for further critical transport infrastructure etc. In addition the following were identified as common issues to neighbouring authorities:

- Where opportunities existed for the provision of additional housing land – noting constraints within the respective authority boundaries and beginning discussions where options may need to be explored
- Transport infrastructure requirements and capacity
- The importance in addressing air quality, particularly in proximity to designated Air Quality Management Areas
- The Lower Thames Crossing and its impact on local authorities directly and indirectly affected and connections into the wider road network
- Proposals for the London Entertainment Resort on the Swanscombe Peninsula
- The consideration and implication of Green Belt review/release along the western border in common with Gravesham Borough Council, and to a lesser extent with Tonbridge and Malling Borough Council
- Impacts of developments in proximity to borough boundaries.

4.8 Discussions also covered other matters such as minerals and waste, wharves, cross border movements, migration patterns, the future of Medway Maritime Hospital, the review of the London Plan, self build and custom housebuilding, and brownfield registers.

4.9 The council is continuing to engage with Duty to Cooperate bodies as an integral part of the preparation of the new Local Plan. Further specific engagement activities will be held in conjunction with the Development Strategy consultation in early 2018.

5. CONSULTATION EVENTS

Overview

- 5.1 The council held 'drop in' style exhibitions on the Development Options proposals in community venues across Medway, open to all to attend. It also organised a series of thematic workshops to consider key issues in more detail. These meetings took the format of a short presentation on the Development Options document, followed by a discussion on key issues to be considered. The thematic based events were useful in gathering detailed information, to determine components of the plan's vision and objectives and support the development of policies. Invites to the workshops were sent to key stakeholders and representatives of business and community interests. Planning officers also attended partnership meetings where they presented on the emerging Local Plan and opened up discussion on issues. Meetings were held with youth representatives including representatives from the youth parliament and a number of local partnerships, including Town Centre fora in Chatham, Strood and Rainham, and community PACT meetings in Chatham, Gillingham and Rochester.

Exhibitions

- 5.2 The council organised 16 events at community venues across urban and rural Medway. These attracted over 653 people, which was a significant increase from the Issues and Options consultation and comparable stages in the preparation of earlier planning policy documents. Over 500 flyers and summary documents were given out at the consultation exhibitions. A briefing was arranged for parish councillors in advance of the community events. The table below shows the level of attendance to the exhibitions, with the highest attendance in Cliffe at 181 people. The main issues raised by people attending the exhibitions were interest in the options for Medway's development, and concerns on how infrastructure would be improved to cater for the rise in population. Particular issues were voiced in relation to pressures on health, education and transport services. Residents generally accepted the need for additional housing, and welcomed opportunities for local people, such as young families and older people being able to access the type of housing they sought in Medway. There were some concerns that local people were being 'priced out' of the local housing market, particularly by people moving from London. Local people often spoke of areas which they valued in Medway, such as open spaces, countryside and historic buildings and places, which they wanted to see protected. They also identified areas where there was potential for improvements. A frequently voiced ambition was to see a strengthened role for town centres across Medway. Regeneration was generally supported, but many spoke of the need to ensure that areas were not overly 'gentrified', pricing out wide groups of people living in Medway.

Event venue	Attendance	Date held	Time of day
Chatham	8	25/01/2017	evening
Hoo St Werburgh	120	28/01/2017	Saturday morning
Parkwood	16	30/01/2017	afternoon
Rainham	27	04/02/2017	Saturday morning
Rochester	32	07/02/2017	evening
Lower Stoke	48	10/02/2017	morning
Rainham	29	11/02/2017	Saturday morning
Gillingham	8	14/02/2017	evening
Lordswood	22	15/02/2017	evening
Cliffe	181	18/02/2017	Saturday morning
Cuxton	22	20/02/2017	afternoon
Horsted	10	21/02/2017	evening
Strood	22	23/02/2017	evening
Chattenden	42	25/02/2017	Saturday morning
Halling	22	27/02/2017	evening
St Mary's Island	44	01/03/2017	evening
Total	653		

Thematic meetings/workshops

- 5.3 The Planning Service organised a number of thematic workshops, with an invited range of stakeholders, which also helped to engage a range of organisations, community groups and businesses in the development of the Local Plan. These included events on the topics of the Environment, Retail, Employment, Transport, Health, Housing, Skills, Sport and Utilities issues. Officers additionally attended, by invite, a range of partnership meetings, including of residents associations, Medway Innovation Board, Medway Youth Parliament and the Medway Pensioners' Forum in association with the Development Options document.
- 5.4 The meetings took the format of a short presentation on the Development Options document, followed by a discussion on key issues to be considered. The thematic based events were useful in gathering detailed information, to determine components of the plan's vision and objectives and support the development of policies. A schedule of meetings held during the consultation is set out in the table below.

Consultation Meeting	Date
Tonbridge and Malling Borough Council	10 January 2017
Natural England	17 January 2017
Briefing for Medway Parish Councils	17 January 2017
Gravesham Borough Council	25 January 2017
Gillingham Green PACT	25 January 2017

Thematic meeting – Utilities	3 February 2017
Maidstone Borough Council	6 February 2017
Medway Equalities and Access Group	7 February 2017
Thematic meeting – Environment	8 February 2017
Kent County Council	9 February 2017
Medway Youth Parliament	10 February 2017
Thematic meeting – Education	14 February 2017
Swale Borough Council	14 February 2017
Thematic meeting – Sport	15 February 2017
Thematic meeting – Retail – Rainham Town Centre Forum	16 February 2017
Thematic meeting – Health	17 February 2017
Thematic meeting – Community Facilities	20 February 2017
Thematic meeting – Transport	21 February 2017
Highways England	21 February 2017
Thematic meeting – Employment	22 February 2017
Medway Bus Operators	22 February 2017
Thematic meeting – Skills	27 February 2017
Thematic meeting –Housing	1 March 2017
Thematic meeting – Retail – Strood Town Centre Forum	1 March 2017
All Saints Residents Association meeting	2 March 2017
Thematic meeting – Retail – Chatham Town Centre Forum	2 March 2017
Medway Pensioners Forum	26 March 2017

5.5 Key matters arising from the meetings and workshops included:

- Securing effective improvements to infrastructure to meet the demands of Medway’s growing population, particularly in transport, utilities, education and health services
- Support for continuation of the regeneration programme, but some debate on the extent to which brownfield development alone could meet development needs over the plan period
- Balancing Medway’s development needs with managing the potential impact on the natural environment, with particular consideration of flood risk, air quality and green infrastructure
- Debate over the possible role of Lodge Hill, in securing its status as a designated SSSI and considering its potential for development
- Impacts of strategic development, such as the proposed Lower Thames Crossing
- Advantages and constraints associated with different aspects of the proposed development scenarios
- Degree of protection to be afforded to the best and most versatile agricultural land
- Acknowledgement of existing service pressures, such as on healthcare at Medway Maritime Hospital and local GP surgeries and the need to plan accordingly for sustainable growth

- Providing for a range of housing needs, including for older people, students and affordable housing, and addressing areas of poor quality housing
- Support for strengthening the role of town centres, including greater use for residential, reviewing town centre boundaries, improvements to the public realm, reviewing car parking provision and costs
- Addressing negative perceptions of Medway that suppress economic prosperity through delivery of sustainable development, with investments in transport and urban centres
- Transport impacts associated with development options and acknowledgement of cross border issues. Need for detailed assessments to ensure that development is deliverable without severe impacts on road network.
- Call for the plan to make provision for changes in transport industry and patterns of travel, including electric vehicles and the role of public transport, walking and cycling and align with strategic investments in roads and rail transport.
- Planning for freight transport
- Role of the river and water based transport
- Planning for a skilled and adaptable workforce.

6. RESPONSE ANALYSIS

Overview of responses

- 6.1 The council invited comments on the matters set out in the Development Options document. Views were sought on a series of policy approaches and development scenarios for growth. Many respondents focused on specific areas of interest, rather than commenting on all themes. The development option scenarios, involving potential development sites were the focus for the majority of responses rather than the policy approaches.
- 6.2 331 'general' written responses were received to the Local Plan consultation, outside of the representations made in specific reference to the campaigns promoted for Lodge Hill and Gillingham Football Club. The responses were submitted through the online questionnaire and by email/letter to the council. The online questionnaire was most frequently used by members of the public. Developers and statutory consultees generally submitted responses by email, focusing on specific matters of interest.
- 6.3 The 'general' responses fell into a number of broad categories of stakeholders listed in the table below with the largest proportion of responses coming from the public at 54% followed by developer/consultants (17%).

Proportion of total responses by respondent type	
Category of Stakeholder	Percentage
Members of the public	54%
Business	3%
Charity/Community/Faith group	6%
Developer/Consultant	17%
Local authority	3%
Government department/Public bodies	6%
Councillor/MP/Parish Council	4%
Other	3%
Information not given	4%

- 6.4 The most frequently raised matters concerned the scale of potential growth being considered in the Local Plan and the associated impacts, particularly on infrastructure, such as transport, utilities, education and health services. In addition to the responses generated in support of the campaign to protect the Lodge Hill SSSI from development, there were comments raised in relation to Lodge Hill. Local people stated how they valued greenspaces and countryside in forming Medway's character. From the perspective of the development industry most representations sought to promote specific sites in Medway, and provided comments on the

emerging evidence base, and requests for policies to be sufficiently flexible to support development.

Lodge Hill

- 6.5 A high volume of responses (11,681) were received in association with a campaign to protect the Lodge Hill and Chattenden Woods SSSI from development. The RSPB facilitated an online 'Save Lodge Hill' campaign to encourage the general public to respond to the Development Options consultation. A dedicated RSPB webpage set out the RSPB's position and provided an online tool enabling respondents to generate an email submission. The tool allowed responses to be tailored with additional, personalised content. Other local environmental groups also encouraged their supporters to make representations to protect Lodge Hill from development.
- 6.6 The council received 11,554 emails and 127 letters via the RSPB's campaign. 1,169 responses were submitted via shared email addresses. This is likely to be as a result of resubmission, perhaps where respondents were expecting to receive confirmation following their original submission, or where different individuals share an email address. In total, 11,190 valid postcodes were provided. Many responses came from outside of Medway, reflecting the status of the national campaign. One-quarter of responses were received from the South East region, 7 per cent (798) were received from other areas in Kent, with 4 per cent (493) from people living in Medway. Within Medway, 38% of responses came from people living in the Peninsula and Strood Rural wards which are closest to Lodge Hill.
- 6.7 The responses objected to inclusion of Lodge Hill as a potential development site due to its status as a designated SSSI and provided grounds for their objections. More specifically, statutory bodies and environmental interest groups objected to its inclusion without having the site taken through the same appraisal and constraints analysis as all other sites considered through the Strategic Land Availability Assessment (SLAA), published in January 2017 to support the Development Options consultation.
- 6.8 Natural England did not consider that a compensation package for Lodge Hill would be acceptable. Neighbouring authorities had concerns with reliance on including such a large site as a contribution toward the development strategy, and as a result the ability of Medway to deliver its housing target. It was recommended that officers undertake a public consultation to explore scenarios with and without Lodge Hill.

Gillingham Football Club

6.9 During public consultation on the Development Options, Gillingham Football Club promoted Mill Hill as a suitable site for a 'state-of-the-art modern stadium, enabling development and other facilities'. The consultation was used as an opportunity to demonstrate support for the proposal and in much the same way as the Lodge Hill campaign, promoters of the scheme campaigned for people to send letters and emails of support to the Council, providing a template that could be used in drafting responses. 519 responses were received on this specific issue. 87% (453) supported the club's proposals and 13% (66) objected to the plans. Analysis of valid postcodes given showed that two-thirds of support was from respondents living in Medway, whilst the remaining third was mostly from the wider South East. Most of those who objected to the plans were also local to Medway.

Summary of responses by structure of the Development Options document

Vision and strategic objectives

6.10 Responses from the consultation showed general consensus for the ambitions set in the draft vision and the strategic objectives for the Medway area. There was particular support for maximising regeneration and economic growth. Some respondents referred back to this section in making comments that potential development options or policy approaches may not align with the vision and objectives set for Medway's growth. This was particularly raised in relation to concerns that potential development of Lodge Hill would have on the area's environment. There were some comments that a focus on Medway as a modern city undermined the distinct identity of the area's historic towns and villages. Some specific comments were raised in seeking a greater recognition of the needs of older people, climate change, maximising the benefits of new infrastructure, such as the Lower Thames Crossing, and establishing a 'smart city. There was support for the greater role of the Universities and colleges in Medway and for a 'learning quarter', with greater integration of students into wider Medway.

Delivering sustainable Development Options

6.11 This formed the basis of the great majority of responses, with local people, developers and wider consultees providing views on how Medway should approach planning for growth. Although the development scenarios provided options on how growth could be distributed across Medway, many respondents, particularly local people, focused on specific sites and locations that they considered to be suitable or unsuitable for development. Again there was support shown for regeneration, but varying views as to whether it was feasible to concentrate Medway's growth into a defined urban area, and if it would be viable. Overall there was support for a

'brownfield first' approach. Generally local people showed the strongest support for options that intensified development on regeneration sites, and avoided the loss of greenfield sites. There were a number of responses made specifically to the option of expanding Hoo St Werburgh into a small rural town. Many local residents strongly objected to the loss of rural character and pressure on services arising from such scale of potential growth. Further comments were given on local constraints in wider Medway to development, including transport infrastructure, services and environmental considerations.

- 6.12 The development industry and other stakeholders challenged the deliverability and soundness of such a strategy, considering that it would not meet the full range of development needs, or be supported by the market. A number of respondents identified the need to review the calculation of housing need to take account of the latest household projections and provide greater clarity on how Medway was taking account of unmet housing needs from neighbouring areas and migration trends from London.
- 6.13 Comments made in relation to development options largely referred to the capacity of infrastructure and the local environment to accommodate such growth. Responses from neighbouring local planning authorities raised issues on cross border impacts, particularly where development sites may be close to the borough boundary or impact on transport routes or key services.
- 6.14 A number of responses stated that the council should explicitly consider an alternative development option that did not involve development impacting on the designated SSSI at Lodge Hill. Some comments also sought alternatives to the consideration of a new stadium site for Gillingham Football Club. Generally respondents sought greater detail on the potential sites and refinement of options to identify the quantum and mix of development being considered through the emerging Local Plan.

Housing

- 6.15 Housing attracted a number of responses with concerns regarding the scale of development and its associated impacts, particularly on services and the natural environment. There were concerns raised on the need for affordable housing for local residents, particularly younger people. Emphasis was placed on the need to demonstrate how affordable housing delivery could be maximised.
- 6.16 Many responses expressed support for a broad housing mix and housing suitable for different groups and income levels within the Medway area.
- 6.17 The specific needs of older people were often mentioned. This included consideration of design issues in housing suitable for older people, who may face

health and mobility issues. There were some comments specifically seeking more bungalows, planning for people with dementia, and 'retirement villages'.

- 6.18 Other specific groups mentioned included students, and there was support for dedicated provision and some opportunities were seen in town centre locations. The accommodation needs of rural workers were raised. There was a comment that the criteria for Gypsy and Traveller accommodation should include consideration of the agricultural land classification. Planning for self build housing was raised and the use of accelerated construction to support the delivery of housing. Opportunities for improving areas of existing poor housing were sought.
- 6.19 A number of representations on the calculation of the scale of housing need and housing market area were made in this section, particularly from the development sector and neighbouring local planning authorities.

Employment

- 6.20 There was support for strengthening the local economy and reducing the rate of out-commuting. The role of the Universities in growing the economy was mentioned and the opportunities for graduate retention and improving the skills levels of Medway's working population.
- 6.21 There were mixed views on the option raised in the consultation document on the potential redevelopment of Medway City Estate and relocation of employment activities to an extended site near Kingsnorth. Some supported the regeneration ambitions that could be achieved, but others considered that it would be undeliverable and could damage the local economy, knocking the confidence of the many businesses sited at Medway City Estate. Generally comments supported a diverse portfolio of sites and flexibility to provide the right environment for business growth. The council's regeneration strategy should support the employment land portfolio.
- 6.22 A number of representations were received from businesses supporting the retention of their key sites for employment uses, such as at Grain and Kingsnorth. However there were other developers and landowners promoting the redevelopment of employment sites, bringing forward more land for housing. There was support for an extended employment area at Rochester Airport
- 6.23 Many of the responses considered specific sectors. Local people and groups made frequent comment on the need to protect productive agricultural land from development, linked to concerns about food security. Representations in relation to the farming sector called for flexibility in considering the needs and opportunities for diversification and growth in land based businesses. Others identified growth opportunities in the creative and cultural industries sector and sought flexible start

up/'pop-up' spaces for businesses. Tourism was seen as a key sector by some, with opportunities to enhance Medway's role as a tourism destination, and an increased choice of accommodation, including camping and caravanning, and B&Bs. It was considered that the healthcare sector should be afforded a higher profile for its role in the local economy.

Retail and town centres

- 6.24 Many of the responses identified the pressures facing traditional High Streets, linked to changes in retail trends. There were particular concerns raised about some of Medway's town centres, such as Chatham, Gillingham and Strood, and calls to improve the quality and range of shops and the public realm.
- 6.25 There were some mixed views on the role of Chatham. Many supported its position at the top of the retail hierarchy in Medway, but others considered that more of the retail growth should be directed to other centres, such as Hempstead Valley Shopping Centre and Strood. A number of responses raised concerns about the impact of out of centre shopping on the town centres, but some argued that peripheral sites were accessible and attractive to customers.
- 6.26 Opportunities were seen to enhance the vibrancy of town centres, through new residential development and a greater range of cultural and community activities. Student accommodation in town centres was supported by some. The historic character of Medway's towns was a potential basis for investment and attracting more people to the centres. Some called for a more flexible approach to uses in town centres and review of the boundaries.
- 6.27 The role of Chatham Maritime and Dockside in the retail hierarchy was raised. There was support for local shops in performing an important social role in communities.
- 6.28 Some comments were received on the evidence base on the Retail Needs Assessment supporting the emerging Local Plan, and wanting to see the allocation of retail needs in the development scenarios. Queries were raised on the assessment of qualitative needs.

Natural environment and green belt

- 6.29 Concerns were expressed about the potential impact of development on the natural environment and Green Belt. The main issues raised were impacts on landscape, loss of productive agricultural land, and damage to biodiversity. Local people attached strong value to areas of countryside and open space, and considered this an intrinsic component of their quality of life and Medway's character. Generally there was support for the retention of the Green Belt boundary, but some representations

indicated the need for a Green Belt review. There were a small number of developers promoting sites in the Green Belt.

- 6.30 There were a large number of specific comments raised in relation to the consideration of Lodge Hill as a potential development location, and the associated damage that could occur to the designated SSSI, as outlined above.
- 6.31 Comments were made on the issues of air quality, noise, contaminated land, flood risk and surface water drainage, and the role of the plan in effectively addressing these concerns. A number of respondents identified that more use could be made of the river, including establishing a riverside path, as part of a wider network of public rights of ways. The need for additional allotments to support an increased population was identified.
- 6.32 There was general support for the green infrastructure policy and the approach to the Strategic Access Management and Monitoring scheme. Some developers sought flexibility in the policy and tariff approach. There was support from neighbouring local planning authorities and wider stakeholders on the cross border planning of green infrastructure.

Built environment

- 6.33 Generally people wanted to see Medway's growth characterised by quality development, built to design standards that were fit for a range of households. Developers asked for flexibility in design policies. A number of comments were received supporting greater energy and water efficiency in development, and making provision for electric vehicle charging and cycle access and storage. Opportunities to promote healthier and safer environments were raised. Medway's heritage was identified as a key consideration, with opportunities for enhancement and areas identified needing specific assessment. A strengthened evidence base on heritage was sought.

Health and Communities

- 6.34 There was support for addressing health inequalities and embedding health considerations throughout the plan. There were specific references to the needs of older people, and planning for a 'dementia friendly' Medway. Security was raised as a health consideration and the health issues associated with homelessness were mentioned.
- 6.35 Many local people commented on pressures on health facilities and sought improvements to hospital and GP services. Suggestions were made for a new hospital site, including land at Lodge Hill. Medway NHS Foundation Trust supported working with the council to plan for health facilities.

Infrastructure

- 6.36 Infrastructure was a frequently recurring theme raised throughout the responses given, with great concern around the strain on resources that exist already, and how these services would cope with an increase in demand with a projected population increase totalling over 330,000 people by 2035. Concerns around infrastructure were focused on key areas including; schools, healthcare, transport, leisure activities, open spaces, and utilities (e.g. gas, water). Particular concern was expressed surrounding the existing strain on health care services, particularly hospitals including Medway Maritime Hospital, which currently falls within a large catchment area, and difficulty in obtaining GP appointments and other health care services. With regards to schools, the shortage in supply of teachers has raised issues around the quality and choice of education received.
- 6.37 There were a number of specific issues raised regarding infrastructure which crossed over into other thematic sections of the document, such as health and transport. There were concerns about the lack of sport and leisure facilities, with implications for people's health. An updated evidence base for sport and recreation was needed. Broadband and mobile phone services in rural areas were considered to be in need of improvements. Comments were made on the specific needs for faith facilities. Opportunities for co-location of services were identified. Resourcing for Kent Police was raised as an issue, and there were suggestions to engage with parish councils, particularly on community facilities.
- 6.38 There were concerns that improvements in infrastructure were not keeping pace with housing growth, and the impacts of 'piecemeal development' not delivering the strategic investments needed to upgrade services. A coordinated and timely approach to infrastructure planning and delivery was sought, so that people could be confident of sustainable growth. Developers sought flexibility in policies and consideration of viability.

Sustainable transport

- 6.39 Local people were particularly concerned about planning for transport, both in addressing current issues and in managing the potential impacts of future growth promoted in the emerging plan. Pressures on the road network within and around Medway were frequently mentioned, together with limitations to public transport options. There was strong concern that development would lead to unacceptable congestion and directly impact on the quality of life for residents and businesses. More specifically mention was made of the A2 and the high concentration of traffic around the high streets; the impacts of Lower Thames Crossing; developing lower Gillingham and the Hoo area which will have a direct impact on the highways. It was commented that major roads with better links to the M2 were required. Suggestions

were also offered for a new river crossing at Hoo linking with the lower Gillingham road to reduce through traffic and link to the M2. There was a prevalent concern surrounding the motorways. A robust evidence base was needed to demonstrate how and where growth could be accommodated and where upgrades would be made to the highways network.

- 6.40 There were calls to further invest in sustainable transport choices, such as a new light rail link on the Hoo Peninsula, new stations at sites such as Medway Valley Park and Mill Hill. There was support for better provision for walking and cycling, particularly through dedicated routes, and safe and adequate parking. Parking was raised as a concern in relation to residential development and securing the role of town centres. Development in proximity to transport hubs was mentioned in some responses as a potential element of Medway's growth strategy. Responses also expressed a need for more train services to and from London.
- 6.41 A number of comments made reference to strategic transport infrastructure, such as consideration of the impacts of the proposed Lower Thames Crossing, and the surrounding motorway network. This was a key cross border issue identified by neighbouring local planning authorities and statutory consultees, particularly in relation to potential development sites, traffic generation and air quality impacts. Managing HGV traffic and parking were also particular matters raised. River crossings in Medway were fundamental to transport networks and there was a call to consider the strategic importance of Rochester Bridge and consider opportunities for further crossings.
- 6.42 The use of the river was mentioned, and the opportunities for water based transport, particularly freight, as well as leisure activities and establishing a riverside path. Comments were made that environmental issues should be explicitly considered in relation to marinas and moorings.

Minerals, Waste and Energy

- 6.43 Fewer comments were received on this theme. Concerns were raised about the option to redevelop Medway City Estate and the potential to lose minerals wharves capacity, that could lead to pressures on other facilities outside of Medway. Transport of aggregates should be encouraged by road and rail. Clarification was sought on mineral importing and safeguarding.
- 6.44 It was suggested that the plan should make reference to the waste hierarchy and waste water treatment.
- 6.45 A number of responses sought greater promotion of low carbon energy and supporting policies and land allocations. There were opportunities for production of

biomass, further renewables installations and storage of distributed energy resources. The strategic importance of land at Grain for power generation and energy storage was acknowledged.

7. Next Steps

- 7.1 The council has collated the responses received and identified the specific matters raised. The representations have been published on the council's website for wider review. The matters raised have been assessed and the council has taken these into account in preparing for the next stage of plan preparation. This includes the further development of the evidence base for the Local Plan.
- 7.2 The council is consulting in Spring 2018 on a Development Strategy document setting out options for how Medway could meet its growth needs over the plan period. The consultation programme will build on the work carried out to date, and the council will continue to engage with neighbouring local authorities and statutory consultees on cross border strategic matters as part of the Duty to Cooperate.
- 7.3 Outcomes of the next consultation stage will be published in Autumn 2018, with further work on the council's new Local Plan for Medway.