

-----Original Message-----

From: Jo Brown [REDACTED]  
Sent: 09 April 2017 19:10  
To: harris, dave  
Subject: Medway Local Plan 2017

[REDACTED]

Mr. David Harris  
Head of Planning  
Medway Council  
Dock Road  
Chatham  
Kent. ME4

Medway Local Plan. 2017

Dear Mr Harris

Following the interesting Medway Local Plan display in Cliffe I would like to submit my views for your consideration.

- All development must be sustainable.
- Brownfield sites must be the first used.
- Our landscape must be preserved. It is irreplaceable.
- All agricultural land must be preserved for just that purpose - agriculture.

- Wildlife in all its forms - flora and fauna - must have full protection.
- Villages must not be enlarged to accommodate 'outer Londoners' in 'cheaper' housing.

This does not help local people; it simply brings further congestion.

- Air quality and traffic density must be strictly controlled to improve health.

Our environment is precious and for the sake of future generations long term planning cannot be a simple case of build anywhere today and forget tomorrow.

Please do not allow the greed of a few to dominate the need of many -

the preservation of our rural environment throughout Medway.

I trust you will give this your full consideration.

Yours sincerely,

Mrs Jo Brown

**JOANNA MALE** BA (HONS), MA, MRTPI  
**CHARTERED TOWN PLANNING CONSULTANT**

E-Mail: [REDACTED]

Planning Policy Team,  
The Planning Service,  
Medway Council,  
Gun Wharf,  
Dock Road,  
Chatham,  
Kent,  
ME4 4TR

16<sup>th</sup> February 2017

Dear Sir/Madam

**MEDWAY LOCAL PLAN DEVELOPMENT OPTIONS CONSULTATION AND 2017 SLAA REPORT**

I am instructed to write in respect of the publication of the Council's 2017 SLAA Report and the Development Options Consultation for the new Local Plan. These comments should be viewed in conjunction with those contained within my previous letter dated 29<sup>th</sup> February 2016 in respect of the earlier Issues and Options Consultation.

**2017 SLAA**

My clients own the site of the Former Reservoir, Browndens Road, Upper Halling which was submitted as a suitable housing site for consideration within the SLAA (Site Ref:1046). Within the 2017 SLAA Report, the site has been deemed 'unsuitable' as part of the Stage 4 assessment of the submitted sites. This assessment used the following updated criteria as to 'suitability' and whilst no evidence of the Council's site specific assessment is currently available on their website, a commentary as to the Former Reservoir's suitability against each of the identified criteria is provided below:

**Centres**

Whilst it is accepted that the site does not lie within 800m of an identified centre, as referred to in my previous submission, it lies immediately adjacent to an existing settlement boundary in an area which, despite its rural nature, provides community facilities in terms of a community hall and farm shop together with good access to the primary school, railway station and shops in Halling itself.

**Educational Facilities**

In order to be given a green or amber rating, a site has to be located within 400m or 800m respectively, of an educational facility. This will not be feasible in many instances and Browndens Road lies within 1.8 miles of Halling Primary School, an 11 minute bus journey from the site and a distance entirely practical to accomplish on a day to day basis.

### Open Spaces

The site provides excellent access (within 400m) to an extensive network of public rights of way which allow entry to the open countryside that surrounds the site.

### Transport

An existing bus stop is located in Browndens Road (i.e. within 400m of the site) which provides a service to Halling, Chatham, Rochester and West Malling Railway Stations. The regular service offered also serves local senior schools.

### Site Access

It has previously been accepted by the LPA that a suitable site access could be created from Browndens Road to serve any future development.

### Landscape and Environment

The previous SLAA assessment accepted that *“whilst the site is situated outside of the built up area, the landscape is considered less sensitive and to have some potential to accommodate change”*. The 2017 SLAA assessment criteria indicates that a green ranking should be accorded to sites, such as the Former Reservoir, which are previously developed.

### Heritage

The 2015 SLAA assessment of the Former Reservoir site accepted that any development would be unlikely to have an impact upon any designated heritage assets such that it should score a green rating.

### Flood Risk

The site is at low risk of flooding (Flood Zone 1) such that there is no bar to its future development and it should be accorded a green rating.

### Air Quality

The site is not in an AQMA and no contamination is suspected such that a green rating is again appropriate. The LPA has previously accepted that mitigation for any air pollution is likely to be deliverable.

### Contamination

The 2015 SLAA assessment confirmed that contamination is not suspected on this site such that a green rating should be accorded.

### Agricultural Land

The site is previously developed and not in agricultural use such that it should be accorded a green rating.

From the above assessment it is assumed that the site's *‘unsuitability’* derives from its failure to meet the Council's specific criteria for proximity i.e. within 400m of a 'centre' or to an 'educational facility' since under all of the other categories, the site should score a green rating.



It is unfortunate that the Council has not yet published details of how each individual site scores against these criteria, since it is not possible to confirm if all those sites deemed 'suitable' score green on all of the criteria, although this is considered unlikely.

It is accepted that locating new development in close proximity to existing services and facilities is a key principle of sustainable development which is strongly supported by national policy. However, as recognized in the NPPF, there are three identified dimensions to sustainability: economic, social and environmental. These are all inter-linked and in making a judgement on the relative sustainability of any site, it may be necessary to weigh a number of principles of sustainability, one against another.

The environmental dimension requires a prudent use of natural resources and to this end one of the core planning principles set out in para. 17 of the Framework is that effective use of previously developed land should be encouraged provided that it is not of high environmental quality.

In the Council's SLAA assessment, little or no priority seems to have been given to the fact that my client's site, unlike many similarly located, has been previously developed such that its re-use for residential purposes in preference to a greenfield alternative, is an inherently more sustainable choice. Although the site does not meet the rigid requirements in the SLAA assessment for proximity to a centre and a school, it is material to note that such facilities are available within the local area and are served by the established public transport network.

Furthermore, an assessment that this brownfield site is suitable for development would be completely consistent with the objectives of the emerging Local plan which states: *"The council is following Government policy to promote the use of brownfield land, in preference to releasing greenfield sites"*.

The 2017 SLAA identifies a total of 54 sites capable of providing a total of 6139 residential units. These sites, together with completions between 2012 – 2016, sites with an existing planning permission, residual allocations from the adopted Local Plan, and an allowance for windfalls, provides a current supply of development land for 18,206 dwellings which is referred to as the 'Residential Development Pipeline' in the Development Options Consultation document. This falls far short of the figure of 29,463 dwellings required over the new Local Plan period. It is understood that once responses to the current Development Options have been received and considered, a further review of the SLAA will be completed, in order to inform the next stage of the Local Plan.

My client's views in respect of the relative development scenarios are set out below, however of primary importance is that the Council takes a consistent approach in applying their stated objective to use brownfield land in preference to greenfield alternatives.

Accordingly, it is requested that in undertaking the planned review of the SLAA, the Council reviews the suitability of my clients' site and places an appropriate priority on the sustainability benefits resulting from its re-use due to its previously developed nature, and location immediately adjacent to a settlement boundary which offers access to all necessary

facilities. Failure to do so, would be inconsistent with the Council's stated intention of promoting the use of brownfield land, in preference to greenfield alternatives.

### **Development Options**

The Council's stated aim for the emerging Local Plan is to ensure that Medway grows sustainably, to provide land for the homes, jobs and services that people need, whilst protecting and enhancing the qualities of the area's environment and heritage. Fundamental to this is the Council's stated intention to promote the use of brownfield land, in preference to releasing greenfield sites.

However, taking into account the Council's monitoring information (which includes evidence from the SLAA as referred to above) the Development Options document concludes that *"It is unlikely that the full range of development needs could be met solely in the identified regeneration areas on brownfield land. Therefore greenfield sites in suburban and rural areas may have to form a part of Medway's development strategy for the new Local Plan"*.

The Council have therefore identified 4 development scenarios which are the subject of the current consultation and which the Council are using as the basis of an assessment as to *"which approach could deliver the most sustainable development pattern for Medway, meeting the aspirations set out in the vision and the strategic objectives in the Local Plan"*.

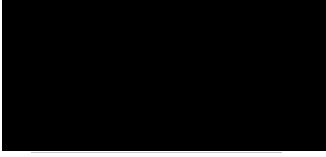
Whilst the Council's assessment that greenfield allocations are likely to be required, may be realistic, the assessment of my client's site within the SLAA would suggest that, to date, the Council has not yet identified the full capacity of existing brownfield sites and therefore is not yet in a position to consider the most sustainable options for development.

As stated above, it is requested that the forthcoming review of the SLAA take a more robust approach in assessing the relative sustainability of sites by placing an appropriate emphasis on their developed character i.e. greenfield or brownfield, in a manner consistent with the Council's stated intention to promote the use of brownfield sites.

In general terms, my clients are supportive of Growth Scenario 4 since it allows for a rural focus for some new development. The use of smaller sites, adjoining existing settlement boundaries will allow an early contribution to be made to the local housing supply without the difficulties associated with land assembly or significant infrastructure improvements. Such sites can support the viability of local rural communities as envisaged by para. 55 of the NPPF.

However, fundamental to achieving the most sustainable development pattern for Medway is the principle of making the best use of previously developed land and accordingly the Council is requested to adopt a development scenario that does this and undertakes an appropriate review of its evidence base i.e. the SLAA in order to facilitate this.

Yours faithfully



Jo Male  
cc. Client

PLANNING DEPT.  
MEDWAY COUNCIL  
DOCK ROAD  
CHATHAM  
ME4 4TR

4 MAY 2017

02.05.2017



05 MAY 2017

Dear Sir or Madam, I understand from Mr. Andrew Bull, who very kindly came to talk to the Medway Pensioners' Forum on 26th April, that there is still time to submit comments on Medway Council's Local Plan 2012-2035.

I have studied the document with maps, that he distributed and I am very impressed with the attention given to the wide-ranging needs and requirements of so many aspects of the Medway community - a daunting task indeed.

One comment I would like to make is for consideration to be given, in planning accommodation (Scenario 1) "mainly in the form of apartments", for Senior citizens specifically, in low rise flats, near town centres, either

private or publicly built for rent or purchase.

Many older folk are living alone in three bedroomed houses, their families having grown up and moved out. If suitable alternative modern accommodation were available, nearer facilities, yet still near familiar surroundings, perhaps they would be incentivised to move and make their property available for a family in need of a home.

I have recently moved from a three bedroomed end of terrace house into the above address, albeit reluctantly after forty years there, but acknowledging increasing age. Accommodation such as this block of flats, seems in short supply, though there must be a great need, which will only increase in the coming years.

Yours truly,

Joan Todd (Mrs.)

[REDACTED]

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**From:** John Burton Burton [REDACTED]  
**Sent:** 01 March 2017 14:22  
**To:** futuremedway  
**Subject:** Fwd: Medway Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

----- Forwarded message -----

From: "John Burton Burton" [REDACTED]  
Date: 1 Mar 2017 14:14  
Subject: Medway Plan  
To: <[www.medway.gov.uk/futuremedway@gmail.com](mailto:www.medway.gov.uk/futuremedway@gmail.com)>  
Cc:

The forthcoming proposed Medway plan appears to have Hoo St Werburgh playing a major roll. I would like to raise a few very important issues that ought to be dealt with before and during but definitely not after any new developments are built.

Traffic on and off the peninsula has always been a issue but even more so now with the increased housing. With more new housing and enhanced employment in the area, one road serving the peninsula for all manner of vehicles is insufficient.

The majority of people will always choose a car over public transport (especially as you can buy a reliable car for the price of a decent washing machine). There will be too many vehicles converging trying to get on and off the peninsula with the majority heading towards London therefore makes sense to spread the traffic across the whole of the Medway Towns along with the new developments.

There is a shortage of GP's throughout the country. The two surgery's in Hoo struggle to meet the demands of the peninsula now and this results in lack of continuity with regard to seeing the same doctor and horrendous waiting times.

Many of the new residents will be from outside the area thus causing greater demand on the infrastructure including all services that the NHS provide.

Hoo's poor infrastructure cannot support the residents now, that is before any new homes are built, even if no more planning permission was granted. This again makes it sensible to spread the new builds across the Towns.

Sustainable Drainage systems play a big part in new developments, unless common sense and observational skills ought to be used along side THE COMPUTER to bring down the GROSSLY OVER ESTIMATED GREENFIELD RUNOFF RATE. All of the fields earmarked for development have lipped edges of 200mm to 400mm in height, this was mainly caused by the soil being dug to form the water courses and with the heavy foliage this in effect creates a basin effect so NO RUN OFF CAN OCCURE even the latest development to start by Abbey Homes this being the case. If this is not addressed parts of residential Hoo will become flood plains.

We probably all realise there is a need for housing but it should not affect the residents of Hoo alone to the degree that this plan could.

Hoo has seen sufficient new housing in the past with NO IMPROVEMENT IN INFRASTRUCTURE, The Medway Local Plan should be exactly as it title says;

MEDWAY !!

NOT HOO AND ITS SURROUNDING AREA.

J Burton

TO: MEDWAY COUNCIL,  
CHATHAM, ME44TR

FROM: JOHN M. J. ROBERTSON,

- 3 FEB 2017

MEDWAY COUNCIL  
LODGE HILL NIGHTINGALES - SSSI.

DEAR SIR,

I AM WRITING TO YOU TO URGE YOU NOT TO  
DESTROY THE NIGHTINGALES SSSI AT LODGE  
HILL.

THIS PROPOSED DEVELOPMENT HAS THE POTENTIAL  
TO LEAD TO THE EXTINCTION OF NIGHTINGALES IN  
THE U.K.

DEVELOPERS THROUGHOUT THE U.K. ARE LINING UP  
TO DESTROY OUR COUNTRYSIDE AND SSSIs -  
TO GIVE IN TO THEM AT LODGE HILL WILL LEAD  
TO ONE ENVIRONMENTAL DISASTER AFTER ANOTHER,  
AND EVENTUALLY THE WHOLESALE DESTRUCTION OF  
SSSIs THROUGHOUT THE U.K.

I URGE YOU NOT TO PERMIT ANY DEVELOPMENT ON THIS  
SITE.

I SHOULD ADD THAT SUCCESSIVE UK GOVERNMENTS,  
BY ALLOWING OPEN DOOR MASS IMMIGRATION, HAVE  
ALLOWED THE UK TO BECOME SEVERELY  
OVERPOPULATED RESULTING IN A NEVER ENDING  
DEMAND FOR MORE HOUSES, ROADS, ETC.; AND AS  
A CONSEQUENCE OUR COUNTRYSIDE (INC SSSIs) IS  
BEING TRASHED.

YOURS SINCERELY,

John Robertson

RSPB MEMBER NO E36576

CC RSPB,  
SANDY, BEDS.

RT. HON THERESA MAY,  
PRIME MINISTER,

LONDON, SW1A, 2AA



7<sup>th</sup> March 2017

613/A3/JJA

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

Dear Sirs

**Re: Medway Council Local Plan – The Development Options Consultation Document – Jan / Feb 2017**  
**Representations on behalf of Redrow Homes Limited**  
**Land at Walnut Tree Farm, High Halstow**

I write with reference to the above. As you will be aware I act for Redrow Homes Limited who have various interests in Medway, including those at Walnut Tree Farm, High Halstow. To this end I wrote to you in February 2016 commenting upon the Medway Council Local Plan – Issues and Options Consultation Document, in particular the Objectively Assessed Housing Need (OAHN) figure of 29,463 between 2012 and 2035 (1281dpa), the link between the level of housing and employment growth being promoted in the plan; the mapping of the environmental constraints; how development in areas that are close to environmentally sensitive locations can actively enhance them / control access to them/ contribute towards an effective green infrastructure network; how a ribbon of small scale urban extensions/ extensions to existing villages in the Hoo Peninsular could help improve access to public transport and address the decline in rural services in this part of Medway; and the merits of the starter homes initiative. We also highlighted the fact that rather than concentrate development in one settlement in the Hoo Peninsular the Council should look to a ribbon of smaller scale growth within the existing villages on the Peninsular to complement a larger scale expansion to Hoo/ Hoo St Werburgh. We also highlighted the fact that Villages such as High Halstow are in our opinion capable of accommodating small scale growth that would complement that in the likes of Hoo and help maintain local services and facilities/ bolster public transport links between the villages to the benefit of all on the Peninsular.

Having regard to the above, we note the OAHN has not changed – it remains at 29,463 over the plan period (1281dpa). As per our previous reps we would question whether the OAHN has taken into account the effects of the London market and whether the housing target has had regard to the requirements of the Duty to Cooperate and thus is providing for any adjacent authority/ looking to others to assist Medway in meeting its needs. Both are strategic issues that the Local Plan needs to address in determining the ultimate housing requirement and the scale and direction of growth. Similarly both are issues that lead us to question the approach and conclusions of the North Kent Strategic Housing and Economic Needs Assessment (SHENA).

Likewise we note that there continues to be no clarity between the relationship between the employment growth forecasts in the SHENA and the proposed housing target. As previously stated housing growth needs to be linked to employment growth if out-commuting is to be reduced.

Turning to the 4 development options promoted in the Development Options Consultation Document we note, and welcome the fact that all 4 provide for incremental expansion at High Halstow. As you will be aware my client has an interest in the Land at Walnut Tree Farm (SHLAA ref 0835) which is shown as suitable, available and deliverable in the January 2017 SHLAA; with appendix 5 suggesting it has the capacity to accommodate 57 dwellings in years 0-5 or 6-10. To this end I note that the SHLAA, 2016 AMR and chapter 3 of the Development Options Consultation Document all suggest

that SHLAA pipeline sites will form part of the current 5 year HLS trajectory as well as that for the remaining plan period.

Having regard to the above we do not really have a view either way on the proposed development options, albeit we would question how realistic option 1B (maximising the potential of the urban regeneration) really is; and the environmental implications of option 1D (Rural Focus).

As set out in our previous reps if Medway Council look to progress a CiL charging schedule with a clear set of identified needs against which CiL payments can be made, a development strategy that integrates the planned expansion of Hoo, a network of small scale urban extensions to the main villages on the Peninsular and a reduced scale of development at Lodge Hill (if permitted), this could, in combination with some incremental suburban development in the less sensitive areas to the south and east (such as Strood and Rainham/Lower Rainham), and some town centre and riverside development, accommodate the Objectively Assessed Housing Needs of the area.

Overall we believe that development on the Hoo Peninsular, including the development of the land at Walnut Tree Farm in High Halstow will help accommodate the Objectively Assessed Housing Needs of the area; that said development can come forward as part of a comprehensive suite of sites to supplement an extended Hoo St Werburgh, and if approved Lodge Hill; and that this would, through a CiL charging schedule with a clear set of identified needs against which CiL payments can be made, help address the service and infrastructure requirements of the Hoo Peninsula, including the public transport requirements of the area; and provide for much need for family sized housing, affordable housing and starter homes without any adverse environmental or landscape impacts. Whilst all 4 development options proffered, provide for development in High Halstow, we believe options 1C, and 1E are probable the more realistic, albeit option 1E may benefit from additional mixed use development in lower Rainham rather than the release of greenbelt land in the Medway Valley.

In the context of the above we would like to highlight Redrow's desire to work with Medway Council on the delivery of its chosen option and to this end would welcome the opportunity to meet with officers to discuss our proposals for the land at Walnut Tree Farm further, if this would be of assistance.

Yours sincerely



**JUDITH ASHTON**  
**Judith Ashton Associates**

C.c. David Banfield Redrow Homes Limited

To: futuremedway@medway.gov.uk

Dear Sir/Madam

### MEDWAY LOCAL PLAN 2035 - CLIFFE

I am writing regarding the Draft Vision and Strategic Objectives outlined in the Medway Council Local Plan 2012 – 2035 Executive Summary.

I would like to raise my concerns regarding the considered development at Cliffe, in particular on the land located between Chancery Road and Cooling Road and also the land adjacent to the Telephone Exchange and running North to Buttway Lane.

Having looked at the map showing these proposals, it seems that this would approximately 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.

#### **These are my concerns:**

1. It concerns me that these proposals seem to be what developers and land owners would like to see happen to our village, they are not what the villagers have said they want. I haven't heard anyone from our village say they would like to see vast areas of our village concreted over.

It seems to me that the developers and landowners have looked at our villages and decided they could make vast sums of money by taking advantage of us and our village. They are not doing it for our benefit but for their own. It seems that these proposals are motivated by their greed for profit not for the benefit of the villages. It is trying to force something on us that we don't want; it feels like the rape of our village.

#### **Is it a Local Neighbourhood Plan that's being prepared or is it a Developer's Plan?**

These major proposals will substantially change the whole character of our village for ever. Our village is small, intimate and personal, with many of our residents having known each other for many years, many from childhood. The village is surrounded by beautiful countryside and highly productive Grade 1 agricultural land, which has been continuously farmed for centuries. It's not built up; it's rural. This is why most of us have chosen to live here.

The proposed sites are situated on the best and most versatile agricultural land and these developments will have a detrimental impact upon these locally valued landscapes.

If these proposals go ahead the small country village character will be changed into a vast, featureless, impersonal housing estate, destroying valuable farm land, the beautiful views over the surrounding countryside and open fields close by, destroying the general openness and character of the whole area where we live, and the neighbourliness of living in a relatively small community.

Cliffe has long been a farming community and the landscape and features relating to this should be respected. This is the reason most people choose to live in the countryside, to

benefit from this type of scenery and rural setting. This rural setting is a direct contrast to living in towns or cities, or even housing estates, and the two are not interchangeable.

Once the developers and landowners have said what they want to do, we, the people that actually live here, are virtually faced with a 'fait accompli'. Proposals which are on the table will always be what the authorities focus on, and push through if it suits them. If it's supposed to be a neighbourhood plan, then surely, all the people of the neighbourhood should be asked first what they feel about having our villages destroyed in this way, not have these things imposed upon us by those who know nothing about our village.

There was a Workshop held recently in Cliffe Memorial Hall, which I attended, supposedly to get the views of the people who live here concerning these developments. The hall was packed because people were greatly concerned by these proposals to build houses on vast areas of farmland surrounding the village. However, the Workshop was deliberately structured to focus people's attention away from the issue for which they had attended, i.e. the housing development plans, and instead they were made to discuss what other amenities they would like to see in the village. It's a very clever technique, which I've used myself when working with consultants, to make people think they've been involved, when the real issue is glossed over and side-tracked. This confirmed in my mind that the Council is going through the motions of consultation and dodging the real issue, but can then say the people didn't have very much to say about the building plans.

Also, these development plans have been very poorly publicised. Many people I have spoken to in the village knew nothing about these plans at all; they certainly didn't know that they should be submitting their comments or objections. Unless you are a Facebook user or managed to see the notice board placed in one location in the village there is no reason why anyone would know anything about them at all. I would have thought that for something that would so dramatically affect the village there should have been a notice put through everyone's letterbox explaining what was at stake and what they should do about it. The result now is that there will be a much smaller response and far fewer objections because many people knew nothing about it, giving the impression that most people in the village are not bothered by the proposals.

**2.** If these plans were to be implemented, doubling the size of our village, then in addition to what's mentioned above:

a. our school would obviously be completely inadequate to cope with the large increase in children. Of course, the school can be enlarged, (doubled?) if there is space, and double the number of teachers, but then again we lose the benefit of the intimacy that a smaller village school provides, to the detriment of all our children.

b. our doctors' surgery, which at present often finds it difficult to offer an appointment in less than two to three weeks, would need to be significantly enlarged or completely replaced, and double the number of doctors, to cope with almost double the numbers of patients. Again, losing the benefits of a relatively small GP practice, where we are often known personally, and being presented instead with a large, impersonal, conveyor belt system where we all become just numbers as in a hospital, seeing a different doctor every time we attend, to the detriment of all the patients that go there.

c. our sewage system, which was installed for a much smaller number of people, would quite possibly not be able to cope, requiring a very costly upgrade or replacement. It already seems to have a significant problem, based on the awful sewage smell that so often seems to be present at the bottom of Lee Green Hill as you approach Cliffe Woods from Strood.

d. our existing approach road from Strood, the B2000, is already seriously undersized and overloaded by the volume of large lorries, buses, coaches and cars making it dangerous. It's a small country road, and almost doubling the population would make this situation intolerable and even more dangerous than it is already. Of course, if enough money is thrown at it the roads could be widened and straightened etc. to deal with all the extra traffic, but then again, we'd become more like a town rather than the country village that many of us chose to live in.

e. access to the proposed new housing sites is poor. Any access via Cooling Road to the proposed site between Cooling Road and Chancery Road would be impractical; this is already very narrow between the existing houses, effectively being a single lane road at that point. Articulated lorries travelling to the farms in Cooling use this road with great difficulty; it is virtually impossible to pass them. There is no other way of access to this site. Any access to the Telephone Exchange site would have to be off the B2000 within the village. This is narrow, effectively single lane through the village due to cars parked in the road outside the houses, and overloaded with traffic at many times during the day.

**3.** Regarding Agriculture in general. When this nation is in the process of leaving the European Union, and much of the UK's food is imported, and our import costs have the potential to rise considerably due to the exchange rate and potential import duty, and when the population is increasing significantly, it seems the decision to destroy valuable food producing land is entirely wrong and has serious implications.

In these circumstances I cannot understand why a growing population would choose to reduce its ability to grow food.

The Government is encouraging the population to consume more fresh fruit and vegetables and to reduce Food Miles with its wider implication for the environment., and so Food Security is not something that should be taken lightly. We live in an ever changing world and add to this the way the climate appears to be changing, we must conserve our highly productive farm land at all costs and find less valuable land that can be considered for redevelopment.

**4.** I recognise that more homes are needed within Medway but surely we should recognise that in this area we have towns and we have villages. We **MUST** let the towns continue to be towns and let the villages continue to be RURAL villages, not try and make the villages into mini towns. I'm sure that if we looked imaginatively at our existing towns we could find many areas where more housing could be constructed. Our town centres are very poorly utilised with dozens of redundant or poor quality shops which offer very little value to the towns and just become vast numbers of charity shops. Just because the landlords or land owners may not have offered them shouldn't mean that they aren't considered as potential locations for the housing needed. It's likely that many, if not most of these properties are owned by investment companies or similar that see them as moneymaking opportunities rather than wanting to productively enhance the areas where they are situated. I believe the local authority should actively investigate how these, and other redundant areas could

be used to meet the additional housing need, (not waiting for them to be offered by the owners,) rather than take good quality, productive farm land in and around our villages just because someone wants to make a lot of money out of us and because we are seen as easy pickings.

Yours faithfully

Keith Martin

A black rectangular redaction box covering the signature of Keith Martin.

8th April 2017



# Kent Community Rail Partnership



## Medway Local Plan Development Options Consultation Response April 2017

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Kent Community Rail Partnership (KCRP) support the vision and strategic objectives laid out in the consultation ie:-

- A place that works well
- A riverside city connected to its natural surroundings
- Medway recognised for its quality of life
- Ambitious in attracting investment and successful in place-making

The favoured development scenario has been identified as option 4, Urban regeneration and a rural town

This combines elements of the first three development scenarios set out in the consultation document, including some higher density development around the waterfront and town centres and seeking opportunities to consolidate development sites in the urban areas. However limited land is identified for comprehensive redevelopment at Medway City Estate and Chatham Docks, due to their complexity. Suburban expansion would be supported to deliver sustainable and healthy urban extensions, but restricted in scale to mitigate the potential for urban sprawl and unsustainable travel patterns. Some aspects of the rural focus scenario would be supported, for their potential to enhance the provision of services and jobs on the Hoo Peninsula, and strengthen the role of Hoo St Werburgh, but not at the scale envisaged by scenario 3.

KCRP are concerned that there is expansion planned in the Cuxton and Halling areas and that this will have an impact on both rail stations. Therefore it is asked that S106 funding be considered to specifically improve access and facilities at these sites and links to other public transport in the vicinity. Development at Halling is strangled by the weight-restricted road-over-rail bridges at each end of the village and this must be considered should any housing developments be approved in this area.

There has been discussion in the past concerning a unified 'Strood Central' station at the point where the Swanley-to-Rochester and Medway Valley lines cross at right angles on different levels. It has been suggested that this should be funded by s106 from the developer of the old Civic Centre site; And/or, better still, a south to east chord near Strood so that trains from Cuxton can run direct to Rochester (and vice versa). Support from Medway Council would be required to put this suggestion to Network Rail.

There are also further comments that KCRP should like to put forward for consideration during this consultation and these are listed below. These have already been discussed with Andrew Bull at Medway Council and some of the information shown has kindly been provided by him and his colleagues.

### Land adjacent to Cuxton Station - request to consider development and encourage use of station buildings at Cuxton and Halling

1. KCRP would like to encourage some land adjacent to Cuxton Station to be developed as housing. The site has been a car park in the past, but this use is now not supported due to constant vandalism. The KCRP would also support Network Rail to encourage local businesses to use the empty station buildings at Cuxton and Halling.
2. Following a consultation meeting with Andrew Bull, Medway Council, they consulted the latest Strategic Land Availability Assessment (SLAA)<sup>1</sup> and accompanying maps.<sup>2</sup> Site nos. 0676, 0782 and 1068 are have been considered to be either unsuitable or unavailable for development. A review of the SLAA will be carried out in 2017. Kent Community Rail Partnership (KCRP) would like to be updated on this once the review has been carried out. This is a high priority as this area is prone to vandalism and fly tipping and also makes the area unsightly.
3. In respect of Cuxton Station any development proposals for the station should include a facility for people to drop off and pick up.

### New station stop at Medway Leisure Park

4. KCRP would like to ask for consideration for a new station stop at the Medway Leisure Park to serve the complex and the hotel. It has also been suggested that if this is not practical, that consideration could be made for a station

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<sup>1</sup> <http://www.medway.gov.uk/pdf/SLAA%20Report%20&%20Maps%20February%202017.pdf>

<sup>2</sup> <http://www.medway.gov.uk/pdf/Map%2012.pdf>



slightly north of the park, so serve any further housing developed here.

5. Following the meeting with Medway Council it was advised that they will need to propose mitigation and other sustainable transport initiatives to support site allocations in the new Local Plan. Medway Council will be responding to the Kent Route Study (Network Rail) and the South Eastern rail franchising (DfT) consultations setting out the scale of growth expected and infrastructure or improvements required.
6. KCRP are keen to support the consideration to an accessible riverside walk/cycle route from Cuxton Station to the leisure park and on to Strood. The riverside here is not particularly accessible to walkers and cyclists and there should also be more cycle parking at the complex. It may be advantageous if this is developed, that cycle hire be made available at the hotel to encourage use of the cycle route as a sustainable way to get to the Medway towns for visitors.

## Extending the Medway Valley Line to Hoo

7. The KCRP would support the extension of the Medway Valley Line to Hoo, given the scale of growth expected in the area. It is clear that the increase in housing on the Hoo peninsular means there are unknown effects at this stage of the increase in traffic to these new developments. There will also be an increase in traffic on the A228 due to the Peter's Village development. Therefore, it is clear that consideration must be made to extending the passenger rail link to Hoo. KCC and Highways England are already concerned about the knock-on effect to the M2/M20/A2/A229/A228/A289, of these developments and this is an opportunity to remove traffic from these roads.
8. Consideration must also be made as to the effects of a new Lower Thames crossing to the road network in north Kent and more specifically, the Medway towns. KCRP would ask for further modelling to be carried out to ascertain traffic volumes on the entire Medway/North Kent road network to support the request to consider a passenger rail extension to Hoo. Support for this will also be requested in the KCRP's response to the rail franchise consultation.

## Improved signage and designated routes

9. The KCRP would welcome improved signage for pedestrians and cyclists, along with improved designated routes from rail stations to town centres and places of interest. Possible with walking/cycling timings. Medway Council have emphasised that priority will be given to sites in locations which can be made

sustainable in site allocations work in the emerging Local Plan. The proposed policy approach to connectivity and permeability in the 'Development Options' Local Plan consultation (mainly for new developments) but may require further work in terms of the legibility of areas outside train stations.

10. Both Cuxton and Halling would benefit from improved signage outside the station with regards to local walks etc. These would be improved, should Medway develop more accessible routes as discussed above.

## Cycle parking

11. KCRP would encourage more cycle parking throughout Medway to encourage sustainable travel. Medway Council have outlined the proposed policy approach to cycle parking in the 'Development Options' Local Plan consultation. The proposed policy supports the adopted cycle parking standards (i.e. number of cycle parking spaces in relation to development) with best practice design criteria.
12. In the Sustainable Transport section of the Local Plan Development Options consultation document, it states. "The monitoring of cycle parking at rail stations has revealed a 60 per cent increase between 2004 and 2014. Cycle parking at rail stations appears to have peaked in the last four years due to the lack of capacity at some sites. However, the new rail station at Rochester provides more cycle parking, while facilities will be improved at Chatham and Strood stations as part of Medway's Cycling Action Plan 2016-18".

## Travel Planning

13. Medway Council employ a dedicated Travel Planning officer but it is not clear what role they have in encouraging rail travel as a sustainable option. Can this be made a priority in view of the increased road use which will inevitable come with new housing development on the scale that is envisaged in the scope of the local plan.
14. The cycling network in Medway does not integrate with other public transport hubs. This also needs to be looked at to increase sustainable travel and remove some of the burden on the road network. There is access to NCN1 and this should be used in a much more strategic way.
15. The KCRP suggests that a cycle hire scheme may have potential to encourage modal shift in Medway, e.g. from Strood Station to Medway City Estate. Medway Council has stated that it will be building on work undertaken by

Sustrans in 2015 and the new Propensity to Cycle Tool to identify new routes to facilitate sustainable travel to/from site allocations in the emerging Local Plan. This should be an integral part of the new local plan.

16. The KCRP also suggests that a park and ride service may also have a role to play.



Mrs Catherine Smith  
The Planning Service  
Medway Council  
Gun Wharf  
Chatham  
ME4 4TR

**Environment, Planning & Enforcement**

1<sup>st</sup> Floor, Invicta House  
County Hall  
Maidstone  
Kent, ME14 1XX

Phone: [REDACTED]  
Ask for: Sarah Platts  
[REDACTED]

30 May 2017

**BY EMAIL ONLY**

Dear Catherine,

**Re: Medway Council Local Plan 2012-2035 Development Options Regulation 18**

Thank you for consulting Kent County Council (KCC) on the emerging Medway Council Local Plan. KCC previously submitted a technical response to the 'Issues and Options' consultation on 29 February 2016 and welcomes the opportunity to comment on this latest draft.

KCC supports the commitment from Medway Council to work with the neighbouring planning authorities in cross-boundary matters. The need to accommodate identified growth for Medway will have impacts on key services provided in Kent – not only for development growth close to neighbouring boundaries, but also in terms of cumulative impacts and pressures. As the options for growth are developed, a clear strategy for delivering such infrastructure should underpin the Plan to ensure that growth is sustainable. Work is progressing in updating the Kent and Medway Growth and Infrastructure Framework (GIF), which highlights the challenges of population growth to 2031, and will also develop a 2050 vision that will also look to longer term ambitions for growth, and KCC recognises the synergies between this work and the emerging Medway Local Plan and the opportunities for collaborative working. KCC also recognises that there may be opportunities arising from the work of the Thames Estuary Commission, which could impact on the draft local plan.

The County Council will continue to work positively with Medway Council to assess and mitigate impacts and infrastructure requirements.

The County Council has reviewed the consultation document and for ease of reference, sets out its comments structured under the chapter headings used in the Local Plan.

**Vision and Strategic Objectives for Medway in 2035**

The consultation document sets out the vision for Medway:

*"By 2035, Medway will be a leading waterfront University city of 330,200 people, noted for its revitalised urban centres, and its stunning natural and historic assets, and countryside".*

KCC supports the recognition of the significant cross-boundary strategic considerations as a core element in defining strategic objectives and a vision for Medway. Medway will experience increasing demands for growth and travel, especially as the planning and delivery of strategic development and infrastructure progresses, including the Lower Thames Crossing, Ebbsfleet Garden City and potential for a Crossrail extension to Ebbsfleet, raising a variety of cross-boundary impacts. KCC is supportive of a vision for Medway that has regeneration at the core of its growth plans and vision – this also aligns with the Thames Gateway vision for North Kent to prosper; through enabling existing businesses to grow, delivering new homes and re-shaping town centres.

There is a real opportunity to utilise Medway's position in the Thames Gateway as an attractive, accessible, well-connected alternative to London for employers. The County Council supports the potential for mixed-use growth in the waterfront areas and therefore welcomes the vision to transform the urban waterfront and neighbouring centres into attractive locations for homes, jobs, leisure and cultural activities.

The current draft of the Local Plan does not consider any of Medway's transport priorities in detail (such as improvements to the A229 corridor between Maidstone and Medway); however, these priorities are explained in more detail in the adopted Medway Local Transport Plan (2011-2026). The pressures that the Lower Thames Crossing Option C proposal will place on the road network through Medway and the corridors beyond into Kent, and the changes to traffic patterns, should not be underestimated. This will include the impacts on the already congested A2, A289 and A226 corridors. The County Council looks forward to continued liaison with Medway Council as it progresses a Strategic Transport Model to ensure that the model covers the key corridors and junctions identified and is compatible with outputs from other transport models which have been developed or are under construction by KCC – in particular that for Maidstone and the Malling/Aylesford Model. The model outputs will be fundamental in informing the County Council's position on the transport impacts of growth.

KCC also welcomes the prominent inclusion of Medway's heritage features in developing a vision for 2035. As part of the key strategic issues, there is a need to regenerate and develop Medway in a way that is sensitive to its past. The Local Plan should seek to ensure that all heritage assets across Medway are used to their maximum advantage so that regeneration is successful and sustainable. KCC supports the inclusion of the two strategic objectives that seek to conserve heritage assets and also contribute to the health and wellbeing agenda. Development is the greatest threat to the historic environment of Medway, but it can also draw on heritage assets and the historic landscape to be more effective at delivering the Local Plan's regeneration objectives.

### **Sustainable Development - Options**

Four strategic development options are put forward; however, the consultation document is at a high-level options stage which, on the whole, does not enable full consideration of impacts around transport, education and cross-boundary issues from development sites. Below, KCC provides some general comments on the development options.

The general approach of accommodating housing provision through larger planned new settlements is supported, as these are more likely to be capable of either providing the necessary infrastructure or sustaining enhancements to existing infrastructure. For settlements proposed to be located close to the border of Kent, consideration will need to be given to this cross-border impact on infrastructure, services and facilities.

Medway Council acknowledges risks with scenario 1, which includes high density development in the waterfront and town centre sites, redevelopment of commercial land at Medway City Estate and smaller allocations in suburban and rural locations. It states that risks have been identified around the ability to deliver within the plan period, potential loss of overall employment land supply, securing infrastructure and services to support growth at this scale, viability of building at high heights and difficulties in providing the full range of housing that the market requires. KCC would not be supportive of an option that fails to secure infrastructure and services that support the planned growth.

KCC has concerns with the suburban expansions east of Rainham and between Gillingham and Rainham (proposed under scenario 2), which, without the right level of supporting community facilities, could result in migration into the neighbouring Swale Borough and subsequent pressure on KCC service provision. The scenario includes incremental growth in a number of villages and rural areas in the Hoo Peninsula and KCC would want to understand fully the consequent implications on the neighbouring districts of Gravesham, Tonbridge and Malling, Maidstone and Swale, particularly with regard to KCC service provision and impact on the road network.

As part of scenario 3, there is a proposal to expand Hoo St Werburgh into a small town, with integrated infrastructure provision and services. KCC considers that this would have merit, by creating a critical mass of development to provide and support the level of services and community facilities required. The main risk identified in the Local Plan under this scenario is the capacity of the road network. The County Council would need to consider the work currently being undertaken around strategic transport networks and potential for upgrades.

Appendix A below sets out the heritage impact of each major development area, together with a table that summarises the impact of each scenario.

## **Housing**

The County Council supports the emphasis on ensuring that infrastructure and service provision is coordinated alongside housing delivery and that housing options will seek to meet a wide range of needs.

The commitment to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people is welcomed. KCC considers that the policy approach sufficiently addresses Medway's aims for developing specialist accommodation through extra care housing and care homes for older people. KCC does place people in Medway care homes and has a good relationship with the commissioners at Medway.

KCC welcomes the positive planning approach for student accommodation which will continue to grow as continued emphasis is placed on further and higher education sectors.

## **Employment**

KCC supports Medway's vision for inward investment and focusing opportunities for business growth in and close to town centres that can capitalise on its position in the Thames Gateway. The policy approach for economic development emphasises the importance of raising higher value employment through supporting development of the Universities at Medway and linking to growth in the wider economy. Links between universities, colleges and local businesses will help to increase productivity and attract inward investment.

The policy approach for economic development focuses predominantly on supporting higher value employment. The encouragement of higher value employment would be supported by assets like the Learning Quarter in Chatham Maritime and the Rochester Airport Enterprise Zone. However, KCC would stress that the Council should not overlook some of Medway's existing strengths, such as the growth in manufacturing within a strong production sector and the opportunities for port and wharf related activities. In addition, the Development Options place significant employment development at Kingsnorth and Grain on the Hoo Peninsula. It would be helpful to understand more fully how these designations would meet identified existing/future business needs.

Medway's policy approach to protect valuable agricultural and rural services, whilst supporting diversification of the land-based sector (where this can demonstrate positive benefits) is supported.

## **Retail and Town Centres**

The Local Plan defines Chatham as the main location for additional comparison retail growth and sets out recommendations for its improvement. The County Council would support a policy emphasis on providing high density mixed use development in Chatham and other Medway Town Centres, providing residents with a range of services close to where they live and planning for a stronger evening economy through enhancement of commercial leisure provision.

## **Natural Environment and Green Belt**

KCC is satisfied that the importance of the European/internationally designated sites has been recognised as part of the Strategic Access Management and Monitoring policy approach. New developments will need to appropriately address any detrimental impacts such as noise, lighting and vibrations that may impact any areas of functional habitat which in turn, will impact upon the designated sites.

In addition to the two outlined policy approaches, KCC would welcome the inclusion of a policy specifically addressing how Medway Council considers the impact upon internationally, nationally and locally designated sites, as well as on protected species/habitats.

KCC would welcome continued input into the North Kent Strategic Access Management and Monitoring Scheme.

Detailed technical comments on the policies within this section are contained within Appendix 2 to the letter.

## **Built Environment**

The policy approach for design is comprehensive, although KCC suggests that it could be broadened to include consideration of how development will fit into the wider historic landscape.

KCC also supports the commitment to include measures to mitigate and adapt to climate change, which remains a key national priority. KCC suggests also incorporating a policy that requires the production of an Energy Statement for major schemes to show how development will address energy issues for efficiency and the use of renewable energy sources.

### **Health and Communities**

The policy approach to health includes investigating options for redevelopment of the Medway Maritime hospital site or its relocation. The hospital serves the wider community including residents in Swale and Maidstone, and development impacts from these areas could put further pressure on the hospital which will need to be considered as part of the investigation and stakeholder work on these options.

The Local Plan recognises the inequalities challenge in Medway and the need to focus more resources on preventing ill-health and supporting people to stay well and independent. Reference is made in the Local Plan to the Sustainability and Transformation Plan for Kent and Medway (STP), which brings the NHS, public health and social care planning together across Kent and Medway. KCC supports that commitment provided within the Local Plan to ensure that the outcomes of the review process of the STP inform the policy provision for healthcare facilities.

### **Infrastructure**

The commitment to engage constructively on strategic planning matters in order to ensure that development is supported by the provision of on and off site infrastructure, services and facilities is welcomed. The timing of infrastructure provision will depend on the housing trajectory and pace of development, and KCC will welcome continued liaison on all cross-boundary infrastructure pressures relating to the County Council's own service provision across Kent.

**Education** - The Local Plan sets out areas being considered for development but does not identify housing allocations and the phasing development. At present, there is insufficient housing data to determine education needs as the Local Plan refers to primary and secondary schools only in passing. There is an absence of any statements regarding the current capacity situation or quantification of forecast pupil numbers and demand mitigation, and no allowance is being made for meeting pupil demand from outside the county. Therefore, KCC is not in a position to make detailed comments regarding cross-border education issues potentially affecting neighbouring districts and boroughs (Swale, Gravesham, Tonbridge and Malling and Maidstone) and Medway in terms of education matters. It is understood that Medway plans to mitigate the pupil pressure arising from Medway's development and KCC requests continued discussion as work on the Local Plan progresses.

**Communications Infrastructure** - KCC is encouraged to see the requirement for new developments (commercial and residential) to have access to superfast broadband prior to occupation. As policies are prepared, KCC would recommend the inclusion of a policy which promotes Fibre to the Premise (FTTP) or requires the consideration of alternative technologies (such as fixed wireless networks) to provide speeds in excess of 24mbps.



## **Sustainable Transport**

KCC would welcome continued engagement, alongside relevant transport providers, as Medway Council plans for strategic road network and rail improvements. The key development sites that are likely to generate additional trips impacting on the routes outside of Medway are at Rochester Airport (which has recently been awarded Enterprise Zone status, as well as a £4.4 million allocation from the Local Growth Fund), Cliffe, Cuxton, Halling, Capstone and Rainham, which has been identified for a significant mixed use development.

There is likely to be an increase in traffic heading into Gravesham, including:

- Via the A226 (which will need to be considered in the light of the Lower Thames Crossing proposals);
- Into Tonbridge and Malling (impacting on Walderslade and Lordswood);
- Via the A228 corridor towards Maidstone (including via the A229);
- At M2 Junction 3;
- On routes through Bredhurst and Boxley; and
- On the A2 through Newington and into Swale, including the A249/ A2 junction.

The impact of the additional journeys on the strategic highway network will need to be carefully considered and quantified, as well as the impact of rat running traffic and localised congestion on rural communities.

The Local Plan does not contain any significant detail on the extensions and redevelopments at London Thamesport and Chatham Docks, which may influence the freight movements and modal shift through Kent and Medway.

**Overnight lorry parking** - Overnight lorry parking across Kent and Medway is a significant problem. Inappropriate lorry parking or 'fly parking' leads to damaged roads, kerbs and verges, environmental health issues, litter and noise pollution issues, which are all heightened when close to residential areas. It is essential that lorries are parked at managed sites with adequate driver facilities, away from residential areas and close to the strategic road network. KCC would therefore urge Medway Council to consider allocating sites in its Local Plan for dedicated lorry parking. Guidance could also be prepared supporting associated policies in the Local Plan, advising prospective developers of best practice when it comes to bringing forward lorry park sites. Any such guidance should consider:

- Proximity to the strategic road network;
- Locations away from existing residential areas;
- Substantial landscaping and screening to mitigate any visual impact;
- Adequate access with visibility splays, turning and manoeuvring;
- HGV parking spaces to be at least 15 metres by 3.5 metres (50 sq. metres); and
- Adequate perimeter security including CCTV surveillance to prevent crime.

It is also requested that Medway Council considers making provision for HGV layover parking within Use Class B8 (Warehouse and Distribution Centre) developments.

## **Minerals, Waste and Energy**

**Minerals** - KCC supports the overall policy approach for minerals. Both Kent and Medway are increasingly more reliant on imported aggregates and Kent expects there to be an increase of aggregates landed in Medway being exported to Kent. The Kent Minerals and Waste Local Plan (KMWLP) 2013 – 30 and the Medway Local Plan 2012-2035 will need to align in respect of the overall vision and objectives. To this end, KCC supports the notion of sharing importation data for minerals/aggregates.

The Local Plan sets out how Medway will meet the needs for land-won aggregates (sand and gravel) and chalk as the main economic geologies in the area. However, it is silent on how Medway will meet the needs for other potentially required materials that may be part of the area's economic geology, or those that may be required by commercial activities within the area reliant on imports. KCC requests clarification on whether there is an expectation that these other economic minerals will be imported from Kent and the wider region and that the policy approach to safeguarding sand and gravel is expanded to all economic minerals where possible. It is assumed that Mineral Safeguarding Areas and Mineral Consultation Areas will be defined as part of the Local Plan.

The Infrastructure Position Statement (IPS) sets out that a more comprehensive assessment will be carried out as part of the minerals planning evidence base for the emerging Local Plan. The County Council, as adjoining Mineral Planning Authority, would welcome the opportunity to work with Medway Council from the outset of its preparation.

**Waste and Recycling** - KCC supports the policy approach for waste, which closely reflects the policy approach for waste with the KMWLP 2013-30. This is welcomed, given the close relationship between the Kent and Medway areas. In order to maintain net self-sufficiency, the policy approach should safeguard all existing waste management facilities from incompatible development and redevelopment to prevent the loss of waste management capacity. Whilst municipal solid waste (MSW) is handled by an external operator, this waste stream should still be considered in the Local Plan, as it has spatial land use implications.

The proposed policy approach does not include reference to waste water treatment works. KCC suggests that this should be considered in the Local Plan, given the anticipated proposed growth in the Medway area. The IPS does however include reference to waste water treatment works and this is welcomed as capacity may need to be increased outside of the Medway area. It is particularly important if growth is located close to the Council boundaries. Whilst householder waste is managed by an external operator with final disposal outside the Medway area, the Local Plan should ensure that the capacity to deal with this waste will be available for the duration of the Plan.

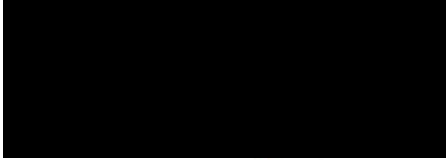
Detailed technical comments on minerals and waste can be found at Appendix 3 to this letter.

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The County Council recognises the importance of the Local Plan in establishing the framework for the sustainable development of Medway. KCC will continue to work with Medway in ensuring we have a shared script regarding priorities; the importance of the Thames Estuary; and the need for infrastructure funding to ensure that Medway's proposed housing and employment growth is supported by necessary infrastructure and service provision.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,



**Barbara Cooper**  
Corporate Director - Growth, Environment and Transport

### **Appendices**

- Appendix 1 – Technical comments on heritage
- Appendix 2 – Technical comments on natural environment and green belt
- Appendix 3 – Technical comments on minerals and waste

## **Appendix 1 – technical heritage comments**

### **Chapter 2 - strategic issues (p13)**

Medway's historic environment has played a significant role in forming the character of the unitary authority today as well as having potential as a contributor to the success of the area in the future. Medway has a wide range of heritage assets, many of which are of international importance. These include 76 scheduled monuments, more than 630 Listed Buildings, and 2 Registered Parks and Gardens. There are many more heritage assets that contribute to character at a local level. These include more than 30 historic parks and gardens, historic landscape features, historic buildings and archaeological sites. Indeed, the Kent Historic Environment Record lists more than 3,300 un-designated heritage assets in Medway. These assets are to be found across the unitary authority. Highlights include Rochester with its important Roman, Saxon and Medieval remains, Chatham, with its internationally important Royal Dockyard and associated fortifications, Gillingham which has Saxon origins and the Thames Estuary fortifications located on the Hoo peninsula and Isle of Grain. Within the rural areas of Medway the historic environment is similarly important: important Palaeolithic remains are present at Cuxton and elsewhere along the former courses of the River Medway and the marshes and intertidal zone are important for later prehistoric remains. The rural areas are particularly important for military and industrial survivals as well as the pattern of historic villages and lanes. Many of these sites are of national significance but currently undesignated (e.g Cliffe explosives works). For new growth and development to be successful in the area it will have to work with the grain of this existing character and, if possible, enhance it.

Among the key strategic issues is the need to regenerate and develop Medway in a way that is sympathetic to its past. At present, Rochester is a visibly historic area with many high quality buildings and an attractive streetscape. Chatham has areas, primarily associated with the river frontage, Dockyard and historic fortifications that are similarly attractive. In Gillingham, by contrast, historic features are less common and visible yet Gillingham is a historic settlement dating to perhaps Anglo-Saxon times. The river frontage contains numerous heritage assets and has great potential for heritage-led leisure and tourism. The Local Plan should seek to ensure that the heritage assets of all of Medway are used to their maximum advantage so that regeneration can be successful and durable.

There are a number of key studies and resources that should underpin any consideration and use of Medway's historic environment:

- Kent Historic Environment Record, a database of archaeological sites, historic buildings and landscape features in Kent and Medway. See <http://www.kent.gov.uk>
- The outputs of the Hoo Peninsula Historic Landscape Project – a major project carried out by Historic England from 2009 – 2012 that examined all aspects of the peninsula's heritage. See <https://historicengland.org.uk/research/current/discover-and-understand/rural-heritage/hoo-peninsula/>
- Historic town survey reports for Chatham, Rochester and Gillingham (2004). These reviewed the known archaeological and built heritage of the three towns and identified Urban Archaeological Zones of sensitivity. See [http://archaeologydataservice.ac.uk/archives/view/kent\\_eus\\_2006/](http://archaeologydataservice.ac.uk/archives/view/kent_eus_2006/)
- Kent Farmsteads Guidance (2012) for developers and planners considering development in the countryside. See <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>
- Kent Historic Landscape Characterisation (2001). See [http://archaeologydataservice.ac.uk/archives/view/kent\\_hlc\\_2014/](http://archaeologydataservice.ac.uk/archives/view/kent_hlc_2014/)
- Kent Gardens Trust survey reports for gardens and green spaces in Medway. See <http://www.kentgardenstrust.org.uk/research-projects/reports/?projId=8>

## **Developing a Vision for 2035 (p15)**

Although the historic environment does not feature as a strategic issue in chapter 2 KCC heritagewas pleased to see that Medway's heritage features prominently in the Vision for 2035.

2.37 KCC heritage supports the idea of a coastal path that would link key heritage sites. This should tie in with the England Coast Path being developed by Natural England across north Kent. We have already supplied appropriate Historic Environment Record information and advice to Natural England to guide the route and identify any needed mitigation or opportunities for interpretation and would be happy to do so for Medway Council.

## **Strategic Objectives (p17)**

KCC heritage supports the strategic objective "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." This will help conserve the assets themselves but also ensure that their potential is exploited and that they are enjoyed by local people and visitors. This will also help to contribute to the health and wellbeing agenda.

KCC heritage supports the strategic objective "To deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics;" Development is the greatest threat to the historic environment of Medway but can also draw on heritage assets and the historic landscape to be more effective at delivering the Local Plan's regeneration objectives.

## **3 Delivering sustainable development – options**

The four scenarios presented involve essentially the same range of development areas but the level of development at each is weighted differently within each scenario. We have summarised the heritage impact of each major development area below and provided a table that summarises the impact of each scenario on each development area. KCC heritage has not provided summaries of the heritage assets of the incremental expansion sites of Grain, Allhallows, Lower Stoke, High Halstow, Cliffe Wood, Cliffe, Cuxton and Halling, as this is assumed for all four scenarios.

For these sites there is therefore no difference between the different scenarios. All contain heritage assets, however, and full assessment of proposed development sites will be required before development.

### *Development areas included in the Scenarios*

#### *Medway City Estate & Strood sites*

Medway City Estate lies immediately adjacent to the cutting for the Medway Tunnel during which sediments containing horizons of prehistoric and Roman occupation were recorded. In addition the alluvial deposits in this area contain important evidence of the sedimentological and environmental history of the Medway. Strood lies either side of the probable alignment of Roman Watling Street at the west end of the site of the Roman bridge and Roman burials and buildings have been discovered in the area. Saxon and medieval remains have also been found here. A post medieval tide mill and associated channel lies close to the bridge and by the 19th century the surrounding landscape had been reclaimed for a number of industrial

developments including an oil mill. Remains of the industrial development of the area are also of archaeological interest. Development could also impact on the Frindsbury and Manor Farm Conservation Area and the long view setting of high grade Listed Buildings.

#### *Historic Dockyard, Chatham*

The historic dockyard is of international importance and contains many designated remains in the form of both Listed Buildings and Scheduled Monuments. There is also potential for the discovery of further remains related to the historic river-front. Developments in this area have the potential to impact on both standing and buried archaeological remains, to affect the settings of the monuments or to impact on key historic views and the 'riverscape'

#### *Chatham Docks*

Previous archaeological excavation at both ends of the Medway tunnel has demonstrated that this area has good potential for the discovery of prehistoric remains from the Palaeolithic period onwards. Neolithic, Bronze Age and Iron Age remains were discovered at the east end of the tunnel. It is also possible the remains of medieval and post-medieval river frontages could lie in this area. Towards the south of the development area are the Lower Lines, which form part of the landward defences of Chatham Dockyard. The Lower Lines were constructed from 1803 to address a weakness in the Chatham Lines fortifications and their remains could lie in the development area. Development in this area would need to take account of the setting of high-grade heritage assets as well as the historic long views along and across the Medway – part of the general 'riverscape'.

#### *Grange*

The development area lies in a region of considerable archaeological potential, primarily from the Roman period onwards. At Grange Manor prehistoric features and over 20 Roman structures were excavated including a temple or mausoleum, workshops and roads. Early medieval evidence was also found and Grange/Grench Manor includes the remains of a 13<sup>th</sup> century medieval manor house complex. Close to (or possibly within) the development area also survive the remains of two 19<sup>th</sup> century infantry redoubts. These experimental sites marked important stages in the development of defensive sites. Development could also have an impact on the setting of existing designated heritage assets (such as Listed Buildings) and the character of the Conservation Areas.

#### *Lower Rainham*

The development area has archaeological potential associated with its position close to the River Medway, where a number of past archaeological discoveries have been recorded. These include Romano-British pottery vessels found close to Lower Rainham Road, and probably originally deposited in association with a burial. Other finds from the area include a 5<sup>th</sup> century AD gold Merovingian coin and large numbers of flint tools including Palaeolithic hand-axes.

#### *Rainham*

The Rainham development area has been relatively little studied and few heritage assets are known from within the area itself. Nevertheless, the general potential of this part of Medway is significant and includes important Roman remains to the north and at Hartlip. Roman Watling Street also passes through the development area. There are also a number of historic farmsteads and Listed Buildings.

#### *Capstone*

There has been little formal investigation of the development area. A number of Palaeolithic implements have been discovered in the Darland area. A Bronze Age barrow may have existed at Sharstead Farm. Romano-British burials have been reported from Hale Farm and Gransden's Brickfield although there is little further information about these. Their locations suggest that a Roman routeway may have existed in this area. A possible pre-18<sup>th</sup> century chapel has been identified near Capstone. Fort Darland, built as part of the Chatham ring-fortress in 1899, is located to the north of the area. Although now demolished earthworks associated with the fort remain and these and their setting could be affected by development in the area.

#### *Wigmore*

This small development area lies in an area of more limited archaeological potential. The remains of a medieval chapel are located immediately south of Hempstead Valley Shopping Centre. A Second World War decoy site for the Shorts aircraft factory was located west of Capstone Road and a heavy anti-aircraft battery was installed at Gibraltar Farm. Some camp structures survive.

#### *Halling*

It is not possible from the consultation document to tell exactly where this site is but it seems to be in or close by the Rochester Cement Works. It is possible that the development area thus lies in a site already subject to quarrying in which case the below-ground archaeological potential may be limited although important industrial archaeology assets may still survive. If the site has not yet been disturbed then the site has archaeological potential related to its location on the historic route up the Medway valley. A prehistoric burial, possibly of Neolithic date, has been found to the north of the site and a second, probably Romano-British, burial found in the Bores Hole quarry to the north-west.

#### *Outer Strood/Brompton Farm*

The development area lies in an area of general potential, particularly related to the prehistoric and Roman periods. Excavations for new housing on Hoo Road found Middle to Late Bronze Age features. Cropmarks of probable Bronze Age ring-ditches have been observed c. 1 km north of the development area. Excavations near Four Elms roundabout found evidence for prehistoric, Roman and medieval settlement. North-west of the area a watching brief in 1977-9 found evidence for Roman occupation and a Roman bowl and associated finds were found at Brompton Farm. Roman Watling Street also runs to the south of the development area. Large numbers of finds have also been recorded by metal-detectorists including Roman and Medieval finds but also prehistoric flintwork.

#### *Lodge Hill*

KCC heritage has already submitted much detailed comment to Medway Council on proposed Lodge Hill and Chattenden developments. The development area contains several designated assets (including both Scheduled Monuments and Listed Buildings) and Historic England should be consulted on these at an early stage of any proposed development. The site also contains numerous non-designated assets including both standing structures and archaeological sites. It would be appropriate to retain and re-use some of these both to conserve the assets themselves and also to give the new development character and a link with its military past. Others will need appropriate recording.

Although the development area's more recent military heritage is the main theme of interest at the site there is also potential for the discovery of earlier archaeological remains.

Prehistoric remains have been found at the Four Elms roundabout to the south and Hoo St Werburgh is an important medieval centre.

#### *Hoo St Werburgh*

Past archaeological investigations in the area have discovered extensive prehistoric and Romano-British remains in the vicinity of Hoo. The alignment of a Roman road linking the Hoo Peninsula to Roman Watling Street is projected to run to the south of the former Chattenden Barracks close to the development area. To the north-west of the area, within the Lodge Hill enclosure, a Romano-British cemetery has previously been identified and a further occupation site has been found south of Hoo between the village and the shoreline. The village itself contains built heritage assets such as the church and it is important to protect the long views towards them. There are also Saxon and Medieval remains although the site of the 7<sup>th</sup> century nunnery has yet to be identified. The landscape also contains numerous survivals of the Second World War associated with the GHQ Stop Line that runs from the foreshore south-east of Hoo to the north of Lodge Hill where it turns west.

#### ***New / enhanced employment land***

##### *Grain*

Important Pleistocene deposits have been found in a number of locations on the Hoo Peninsula, such as at Allhallows. Prehistoric peat horizons are known in coastal exposures close to the power station and prehistoric remains are known from the nearby Kent Oil Refinery site. There are also a number of probable ring-ditch cropmarks from close to the power station. A major Iron Age occupation site is known from the higher land at Grain. Roman and medieval remains have also been located at the nearby refinery site. In addition there may be evidence of the medieval and post medieval reclamation of the marshlands. The development area is also close to nationally important defensive monuments along the Grain shore whose setting could be affected by new development.

##### *Kingsnorth*

The Kingsnorth development area has been subject to archaeological study over many years. Despite the presence of an operating power station there is significant potential for archaeological remains from several periods. Mesolithic, Neolithic and Early Bronze Age finds have been recovered and archaeological features from the Middle Bronze Age, through the Late Bronze Age and into the Early Iron Age as well as of Late Iron Age date have been discovered. These included Middle Bronze Age to Late Iron Age fields, field systems and droveways; Middle Bronze Age 'ritual' and funerary activity; Late Bronze Age to Early Iron Age saltworking; and Early Iron Age settlement. During the Roman period there is evidence of industrial activities, agriculture and burials. From the medieval period onwards land reclamation is evidenced by sea walls and drainage ditches. During the First World War Kingsnorth became an important centre of airship development and some of the buildings at the site may survive from this era.

The table below summarises the relative archaeological impacts of the 4 proposed scenarios. This is only indicative, however, and detailed assessment is required to more comprehensively identify heritage risks and opportunities.

##### *Wickham cement works*

Various archaeological remains have been recorded mostly from past quarrying operations. Four Roman urns were discovered west of the application area in 1895 during quarrying for the Wickham Cement Works. In addition an Anglo-Saxon burial was found to the south of the



motorway bridge. Although much of this area has already been quarried it is possible that archaeological remains generally and industrial archaeological remains in particular may survive at the development site.

#### *Rochester airport*

Past archaeological discoveries to the south and west of the airport have revealed evidence for archaeological activity of prehistoric and Romano-British date. These remains include a Roman inhumation to the south of the airfield. It is possible that further evidence for prehistoric and Romano-British activity may extend into the development area. Rochester Airfield was itself established in the 1930s, initially developed by Rochester Council, the airfield was quickly taken over by Shorts Brothers who began flying from the site in c. 1934-35. The site was used for test-flights, a flying school and also hosted civilian flights to Southend. In the Second World War Shorts Brothers had a factory at the airfield which was used for the production of Stirling Bombers. Whilst no operational squadrons were based there a number of planes made emergency landings at Rochester. Although not an operational military airfield, the Rochester site was an important manufacturing site and as such was bombed on a number of occasions. Anti-aircraft defences were installed at the site and there were a number of air-raid shelters to provide accommodation for factory workers. A number of buildings relating to Short's use of the site survive, including hangers, air-raid shelters and other ancillary buildings. Of particular note is Hangar 3, built in 1939, for No. 23 Elementary and Reserve Flying Training School.

#### *Lordswood*

There are no archaeological sites within the immediate vicinity of the development area. The area was wooded until relatively recently although the name 'Swingate' and the nearby borough boundary do suggest Saxon activity nearby before this. The wider landscape of chalk downland, capped by clay-with-flints has produced significant prehistoric material and undated trackways in the vicinity may be of some antiquity.

#### *North Gillingham*

The development area is in an area of archaeological significance associated with early settlement along the Medway, along with latter development of Gillingham as a whole. Recent archaeological excavations at Grange Farm have revealed Romano-British and Anglo-Saxon remains of national importance, including a possible villa complex with associated mortuary areas, industrial activity possibly associated with the control of early economies and part of what may represent a complex Roman road network possibly linking the A2 (a Roman road between London and Dover) to the river. The Borough of Gillingham was extensively developed in the post-medieval period, primarily due to the expansion of military sites within the local area and further to the west at Brompton and Chatham. As a result, extensive truncation to earlier archaeological deposits is likely to have occurred. The significance of the site at Grange Farm provides evidence that villa complexes, such as those found within the Swale area, continue along the Medway towards Rochester, and possibly beyond, particularly in previously undeveloped areas.

	Archaeological potential of major development			
Site	Scenario 1	Scenario 2	Scenario 3	Scenario 4
<b>Mixed use development areas</b>				
Medway City Estate including Strood (scenario 1)	Higher	n/a	n/a	n/a

Medway City Estate (scenarios 2, 3, 4)	n/a	Lower	Lower	Medium
Chatham Docks (scenarios 1, 4)	High	n/a	n/a	Higher
Chatham (scenarios 1, 4)	Medium	n/a	n/a	Medium
Grange (scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Lower Rainham (scenario 2)	n/a	Medium	n/a	n/a
Rainham (scenarios 2,3,4)	n/a	Medium	Medium	Medium
Capstone (scenarios 2,3,4)	n/a	Medium	Medium	Medium
Wigmore (scenarios 2,3)	Lower	Lower	Lower	Lower
Halling (scenario 2)	n/a	Medium/Lower	n/a	n/a
Outer Strood / Brompton Farm (scenario 2)	n/a	Medium	n/a	n/a
Strood (scenario 4)	n/a	n/a	n/a	Higher
Lodge Hill (scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Hoo St Werburgh (scenarios 2,3,4)	n/a	Higher	Higher	Higher
<b>New / enhanced employment land</b>				
Grain(scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Kingsnorth(scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Wickham cement works (scenarios 1,2,3,4)	Medium/Lower	Medium/Lower	Medium/Lower	Medium/Lower
Chatham Historic Dockyard – interface land (scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Rochester Airport (scenarios 1,2,3,4)	Medium	Medium	Medium	Medium
Lordswood (scenarios 1,2,3,4)	Lower	Lower	Lower	Lower
Capstone (scenarios 1,2,3,4)	Lower	Lower	Lower	Lower
North Gillingham (scenarios 1,2,3,4)	Medium	Medium	Medium	Medium
Wigmore (scenarios 1,2,3,4)	Lower	Lower	Lower	Lower
<b>Employment land to offset Medway City Estate</b>				
North of Kingsnorth (scenarios 1)	Higher	n/a	n/a	n/a

## **7 Natural Environment and Green-Belt**

**7.14** KCC heritage would suggest that when Medway Council prepares its Green Infrastructure Framework it makes sure that the Framework takes account of the Kent Historic Landscape Characterisation (see my comments on 'Policy Approach: heritage' below). This will help the proposals of the Framework to complement the historic landscape of Medway. This will help ensure not only that historic landscape features are conserved but that route ways between green infrastructure sites work with the grain of existing tracks, lanes and paths helping connectivity and 'flow'.

### **Policy Approach: Landscape**

All Kent's landscapes are the result of the interaction of natural and human processes over centuries or even thousands of years. When preparing policies designed to conserve the beauty, therefore, it is essential that the historic aspects of the landscape are identified, understood and appreciated. The updated Medway Landscape Character Assessment that is planned will be much more effective if it is combined with an enhanced Historic Landscape Characterisation for Medway. This has already been completed for the Hoo Peninsula which can serve as a template. KCC heritage would be pleased to discuss this further.

## **8 Built Environment**

### **Policy approach: Design (p70)**

The text says that consideration of development proposals should include whether the development "Responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site."

KCC heritage supports this, but to ensure that new development fits appropriately into the existing character also requires consideration of how the development will fit into the wider historic landscape (see section below 'Policy approach: heritage').

### **Heritage (p73)**

General note: it is not possible to include all heritage aspects under the heading of 'Built environment'. Medway's heritage includes archaeological remains and the historic landscape, neither of which are part of the built heritage. In future Local Plan documents it would be helpful if the general title of this chapter could be changed to 'Built Environment and Heritage'.

**8.21** KCC heritage was pleased to see that Medway intends to set out a strategy for the Historic Environment. Medway's heritage has great potential to contribute more effectively to the quality of life in the area than it does at present. The heritage is complex, however, and needs careful consideration to ensure that the opportunities it presents are not missed and that it is not harmed by inappropriate or poorly planned development. In recent years, Kent County Council has developed a Heritage Strategy for Dover District Council, and is currently developing another for Shepway District Council. We would suggest that the goals of the Medway strategy should be:

- To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them
- To assess the role that these can play in regeneration and tourism

- To identify both their vulnerabilities and the opportunities they provide
- To inform site allocations within the district
- To support policy development

There are now a number of models for Heritage Strategies. The most successful not only underpin development control decision-making but support the exploitation of the historic environment to bring a range of economic, social, health and educational benefits. Others can be much more superficial, however, and often fail to deliver the objectives for which they have been established. We would ask that Medway discuss this with us at an early stage.

### **Policy approach: heritage (p74)**

The historic environment of Medway is a rich and complex resource that if conserved appropriately and exploited effectively has the potential to bring great benefit to its people. If treated inappropriately, however, then these benefits will not accrue and Medway's environment, both built and historic, will degrade and developments fail to be successfully integrated into existing communities.

With this in mind, the text in this section is very limited. Presumably, at a later point in the Local Plan process, formal policies will be developed to underpin the management of the historic environment by Medway Council? These will need to include a number of sections that go beyond the current text:

### **Built environment**

#### ***Conservation Areas***

Conservation Areas are key to preserving the historic character of Medway's settlements and helping to tie new developments, in both urban and rural contexts, into existing settlements. Central to this process are Conservation Area Appraisals and we would recommend that Medway Council commit to continuing the CAA programme.

#### ***Listed Buildings***

Medway contains more than 600 listed buildings. These are important markers from the past in the urban and rural landscape and are often central to people's appreciation and understanding of their local character. The Local Plan should contain detail of how these buildings will be conserved such that their significance is retained and where possible enhanced by development.

#### ***Locally listed heritage assets***

Another important management tool for the historic environment would be a Local List of Heritage assets (not just buildings). The assets likely to be included on a local list will be those of particular importance to local communities as opposed to those on the statutory list which meet national criteria. A local list thus allows a particularly responsive and community-led approach to the conservation of the historic environment.

A recent project carried out by Medway Council, Kent County Council and the Kent Gardens Trust is a good example of this. The project involved a community group (Kent Gardens Trust) assisting professionals to review information on key local heritage assets so that they can be included in a local list. The model was extremely successful and would lend itself well to projects aimed at other types of asset.

## ***Military and coastal heritage***

The built heritage of Medway has a number of key themes that policies could develop and support.

Medway has long been an area of military significance for the UK. Much of this importance is derived from the presence of the historic dockyard and the text suggests that this is appreciated. However, the potential of the defence systems that surround the dockyard are not fully appreciated. In particular, the fortifications of Grain constitute one of the most powerful and varied sets of defence sites in the country. These could play a much greater role in Medway's tourism industry which could be particularly important given the range of challenges faced by that part of Medway. There are additional defence sites along the Medway that could be incorporated into river-based tourism, even if some, such as forts Hoo and Darnet could not be visited. Within the Hoo peninsula the remnants of the Second World War GHQ Stop Line forms one of the most complete military landscapes of the Second World War in Kent and in conjunction with the nearby military remains at Chattenden could again play an important economic and social role in this growth area. Further to the west, Cliffe Fort and Slough Fort also have an undeveloped tourism potential.

The exploitation of the Thames estuary for industrial purposes has also left a wealth of historic remains that can be seen today in the form of wharves, jetties, hards, landings and structures. These were constructed to serve a range of industries but the most important of these may have been the gunpowder and explosive industries that flourished in the area, particularly at the Curtis and Harvey Explosives Works at Cliffe. Many of these remains will be clearly visible to people using the coastal path and provide an excellent opportunity for interpretation. Across Medway there are numerous industrial structures that may not be listed buildings but which nonetheless form key components in the authority's character and which would be suitable for sympathetic re-use rather than wholesale replacement.

## ***Townscape***

Settlements have a historic character that go beyond just Conservation Areas and Listed Buildings. The urban environment as a whole contributes to historic character. Elements in this environment such as streets and street patterns, structures, furniture, surfaces, boundaries, open and green space (squares, urban parks, etc.) help to give settlements a sense of place even when they may not warrant protection as Conservation Areas.

## ***Archaeology***

At present, there is no consideration of Medway's archaeological heritage in the document. There are more than 1,500 known archaeological assets in Medway. Many of these relate to Scheduled Monuments such as the remains of Roman and Medieval Rochester. Others are undesignated but still significant to local communities such as the Roman temple/mausoleum at Grange Manor or the Saxon to Medieval remains at Hoo St Werburgh. These are inevitably less visible than Medway's built heritage but are no less important in understanding Medway's past and in giving a sense of belonging to new settlements and developments.

## ***Landscape***

### ***Historic landscape***

The landscape of Medway is the result of the interaction of natural and human processes over many centuries. Even apparently less developed areas of landscape will contain many historic features such as the patterns of tracks, lanes and hedgerows that give character to

the district. Even marshland has been created by reclamation from the medieval period onwards. The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent. Where it is to be applied locally further study is needed to refine its conclusions but it remains an essential tool for understanding Medway's landscape. To be fully effective in local planning and development control, the Historic Landscape Characterisation should be backed up by more detailed case-by-case analysis, to add greater detail through secondary sources. The Hoo Peninsula has already been covered by such an assessment and we would suggest that Medway Council works with us to take forward a general Medway study.

### ***Farmsteads***

Like much of Kent, Medway has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. English Heritage has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that Medway Council considers adopting the guidance as SPD, as part of the Local Plan process. KCC heritage would be happy to discuss this further.

## **Appendix 2 – technical biodiversity comments**

### **Policy Approach: Strategic Access Management and Monitoring**

KCC is satisfied that the importance of the European/internationally designated sites has been identified, along with the threats, in particular through increased recreational pressure.

The SAMMS report also encourages development to include greenspaces within their development proposals to provide recreational areas, particularly for dog walkers. This approach will further alleviate any potential impacts through recreational disturbance on the designated sites and needs to be encouraged where necessary.

On top of the SAMM payments, greater emphasis should be placed on the impacts upon any functional habitat associated with the designated sites. In particular, habitats of principal importance such as mudflats and saltmarshes that are a key component to the SPA, despite not being within the designation. Furthermore, new developments will need to appropriately address any detrimental impacts through noise, lighting and vibrations that may impact any areas of functional habitat that in turn, will impact upon the designated sites.

### **Policy Approach: securing strong green infrastructure**

KCC biodiversity welcomes the inclusion of both statutory and non-statutory designated sites. We would be pleased if the policy included the protection of habitats of principal importance. The UK Post-2010 Biodiversity Framework, published in July 2012, succeeded the UK Biodiversity Action Plan (BAP) and 'Conserving Biodiversity – the UK Approach'. The Biodiversity Framework is now focussed at country-level rather than a UK-level to demonstrate how the work of the four countries and the UK contributes to achieving those targets (JNCC, 2015). Priority species and habitats that were identified under the UK BAP remain important and are now referred to as habitats and species of principal importance. The Kent Habitat Survey (2012) has provided a quantitative assessment of habitats of principal importance and reference should be made to this project.

The policy approach does not include reference to protected species as outlined through the Wildlife and Countryside Act 1981 (as amended), Conservation of Habitats and Species Regulations 2010 (as amended) as well as those listed on section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Any implementation of green infrastructure will need to take into consideration the relevant mitigation measures for protected species.

### **Additional Policies**

In addition to the two outlined policy approaches, KCC biodiversity would welcome the inclusion of a policy specifically addressing how Medway Council considers the impact upon internationally, nationally and locally designated sites, as well as on protected species/habitats.

KCC biodiversity expect that new developments will adhere to the 'mitigation hierarchy', ensuring that where the potential for ecological impacts to occur is identified, the approach to development will first try to avoid the impacts, then minimise impacts and, as a last resort, to compensate for any remaining ecological impacts, ensuring that Medway Council has a full understanding of the potential ecological impacts as material considerations in the planning determination.

### **Appendix 3 – technical minerals and waste comments**

#### **Minerals**

Overall, the policy approach for minerals is supported by Kent County Council. Both Kent and Medway are increasingly more reliant on imported aggregates and Kent expects there to be an increase of aggregates landed in Medway being exported to Kent. It was made clear by the Planning Inspector during the examination of the Kent Mineral and Waste Local Plan 2013 - 30 (KMWLP 2013 – 30) that this source of aggregates is vital to Kent maintaining a steady and adequate supply and therefore the safeguarding policy (point 6) is welcomed. Given the importance of importing minerals via wharves, there is an opportunity for sharing data, where appropriate, for the tonnages of mineral/aggregates imported via wharves to assist with the plan making process.

Following the most recent SEAWP (late 2016) meeting, it was considered appropriate for Kent and Medway to factor in both areas as whole unit for the analysis of aggregate data for the benefit of plan making and strategic planning. This is supported by point 3 of the Policy Approach: Minerals. Therefore, it is necessary for both the KMWLP 2013 – 30 and the Medway Local Plan 2012-2035 to align in regards to the overall vision and objectives and supports the notion of sharing importation data for minerals/aggregates.

Whilst the Development Options document discusses how Medway will meet the needs for land-won aggregates (sand and gravel) and chalk, as the main economic geologies in the area, it is otherwise silent on how it will meet the needs for other potentially required materials that may be part of the area's economic geology or be required by commercial activities within the area that will rely on imports. To clarify what is able to be supplied from the area, an economic geological map is required which will predicate the Mineral Consultation Area and Mineral Safeguarding Areas. The map should also show the safeguarded importation points that may be required for minerals that are unrepresented in the area's geology, such as imported crushed rock and silica sand and to supplement land-won supplies of minerals.

The document states in paragraph 12.3 that Medway imports aggregates but it does not state the type of mineral or aggregate imported and how this will contribute to the needs of a steady and adequate supply of industrial minerals and/or aggregates in the area and its contribution to mineral supply more widely. Paragraph 12.4 suggests that whilst some of the need may be met through secondary and recycled material it is unlikely to account for the whole need. Consequently, the policy approach seems to be weighted towards sand and gravel with less emphasis on meeting the needs of the other economic minerals. Is there an expectation of these other economic minerals being imported from Kent and the wider regional area?

The policy approach to safeguarding sand and gravel should be expanded to all economic minerals where possible and it is also assumed that this policy will be accompanied by Mineral Safeguarding Areas and Mineral Consultation Areas.

Whilst one policy is safeguarding existing mineral infrastructure, another policy approach is seeking to relocate parts of the secondary and recycled aggregate sector that will be displaced through the planned redevelopment scheme. As these policies contain a contradiction it is assumed (though not stated) the safeguarding policy will include exception criteria in which the presumption to safeguard such facilities is exempt if an alternative suitable site is available that is equivalent to, or better than the existing site. It is considered that this position will need expansion and clarification.



Finally, it should be considered that the policy approach should encourage the prior extraction of economic minerals where practical and economically viable in order to meet the mineral needs and prevent needless sterilisation of economic minerals.

## **Waste**

Overall, the policy approach for waste is supported by Kent County Council. The synergies of the policy approach for waste with the KMWLP 13-30 is welcomed, given the close relationship between the Kent and Medway areas. In order to maintain net self-sufficiency the policy approach should safeguard all existing waste management facilities from incompatible development and redevelopment to prevent the loss of waste management capacity. Whilst MSW is handled by an external operator, this waste stream should still be considered in the Local Plan as it has spatial land use implications.

The policy approach does not include any reference to waste water treatment works. This should be considered in the Local Plan given the proposed growth in the Medway area.

## **Minerals & Waste**

The Development Options document provides a substantial basis upon which the Medway Local Plan 2012-2035 can plan for minerals and waste. Given the recommendations from the previous SEAWP meeting and the importance of mineral/aggregate imports for both Kent and Medway, this process will provide a good opportunity for sharing import data. Alternatively, representatives from the Minerals and Waste Policy Team would be happy to meet with Medway Council's officers to discuss mineral and waste matters now and as the Plan progresses.



**Kent  
Police**

Protecting and serving the people of Kent

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Transformation Directorate  
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Date: 2 March 2017

Ref: :

Dear Sirs,

**Medway Council Local Plan 2012-2035  
Development Options Consultation  
Consultation Response**

Kent Police refers to this current consultation and responds as follows. Colleagues will respond separately around specific design matters.

The Kent Police also draws Medway Council's attention to the following case law and Planning Inspector report:

1. On the 22 November 2016 the High Court handed down its judgement in the case of *Jelson Limited vs Secretary of State for Communities and Local Government and Hinckley and Bosworth Borough Council* [2016] EWHC 2979 (Admin).

The High Court rejected all of *Jelson Limited* arguments, as detailed in paragraphs 77 – 81 of the judgement.

Overall, this judgement from the High Court confirms that Section 106 contributions to the police service are fully compliant with the CIL Regulations.

2. Michael J Hetherington BSc(Hons) MA MRTPI MCIEEM, an Inspector appointed by the Secretary of State for Communities and Local Government, 'REPORT ON THE EXAMINATION INTO THE BOROUGH OF REDDITCH LOCAL PLAN NO. 4 (BORLP4)' dated 16 December 2016

Paragraph 84 of this document states:

*Concern has been raised about the Plan's approach to crime reduction and safety, including the provision of appropriate infrastructure for policing and the emergency services. A statement of common ground has been agreed between the Council and the Police and Fire and Rescue services in respect of these matters. Changes suggested by the Council in this regard, including the inclusion of up-to-date crime statistics and a greater emphasis on emergency services infrastructure are necessary for reasons of effectiveness [MM2, MM4-6, MM53-56].*



This, again, confirms appropriate emergency service infrastructure, including policing infrastructure should be included within a Local Plan being necessary for reasons of effectiveness.

Within this context Kent Police responds as follows:

1. Kent Police Estate Strategy Principles:

- To deliver accommodation which responds to the demands of modern policing whilst delivering value for money for the people of Kent
- To deliver an efficient and sustainable police estate, which incorporates energy reduction technologies in line with the Carbon Management Plan
- To ensure a sustainable estates legacy for the people of Kent into the future
- To contribute to the overall Kent Police savings programme, reducing costs and overheads and delivery efficiencies across the police estate
- To reduce the current estate footprint by 25% within 5 years and a commensurate reduction in the cost of running the Estate
- To deliver a flexible estate that responds to the changing demands of modern policing and maximises operational performance
- To improve space utilisation, moving to an 85% space efficiency
- To support the multiple demands of mobile policing
- To move to a position of open plan, agile working with an average desk ratio of 7 desks per 10 employees

The above principles have been taken in to account when compiling this consultation response.

2. Kent Police expresses concern about the Plan's approach to crime reduction and community safety, including the provision of appropriate infrastructure for policing.

A primary issue for the public and Kent Police is to ensure that new developments of the proposed scale within Medway make adequate provision for the future policing needs that such developments will directly generate. Like many public service providers the police service primary funding is insufficient to be able to add capital infrastructures to support major new developments when and wherever they occur. Further there are no bespoke capital funding regimes for the police service (unlike schools; Health; Highways; etc.) to provide capital investment in policing infrastructure. Capital infrastructure has to be funded by borrowing. However, in a service where over 80% of the budget is staffing related, the Capital Programme can only be used to overcome pressing issues within existing infrastructure (premises upgrade/replacement) or to replace essential equipment infrastructure like vehicles, etc., when life expectancy expires.

This situation has been recognised by the National Police Chiefs Council (formally the Association of Chief Police Officers) nationally for some time and there are public statements which explain the particular funding difficulties related to the police service.

The position of police funding was examined and verified by external consultants employed by local authorities in Leicestershire: The Leicestershire Growth Impact Assessment of 2009 concluded at para 82 in relation to policing:

*'It is sensible to assume that most of the capital requirements incurred by growth will not be covered by existing mainstream central and local funding'.*

The Leicestershire situation is replicated nationally including here in Kent.



Faced with the unprecedented levels of growth proposed across Medway, to support the delivery of the public requirements on it, Kent Police has resolved to seek developer/CIL contributions to ensure that existing levels of service can be maintained, as this growth takes place, to the current and growth population. If such contributions are not forthcoming existing resources and infrastructure will have to be stretched further and wider with the resulting negative impact on the level of: service provision to the public; and, crime and disorder (community safety). Of course, Kent Police recognises there are other public sector providers in a similar position but firmly believes the public regard the delivery of effective and efficient policing services as a high priority in order to ensure their safety and security from local, national and international threats. Kent Police accepts its income through the Police Precept will increase as the population grows but, as Medway Council knows, such monies cannot be used for Capital Expenditure, only Revenue Expenditure so is not a funding option with regards to financing these increased policing infrastructure requirements.

3. Kent Police believes the current document fails to meet the requirements of the NPPF for the following reasons and is, therefore, Not Sound:

- a. Under Para 7 in 'Achieving Sustainable Development' the NPPF states: 'There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:
  - an economic role ...
  - a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community needs and support its health, social and cultural well-being; and
  - an environmental role ...'

Whilst Kent Police acknowledges these three elements are recognised within the Draft Plan the NPPF goes on to advise: 'These roles should not be undertaken in isolation, because they are mutually dependent.' It further adds: 'Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.'

As Medway Council will be aware, the NPPF view of 'healthy communities' is far wider than just provision of hospitals and access to doctors, clean air, leisure and fitness facilities, etc., and includes (Part 8, Para 69 'Promoting healthy communities):

- 'safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas'.

It is the view of Kent Police that the document does not take this wider requirement into consideration:

- Para 7 items may have been looked at in isolation;
- due regard may not have been given to the provision of all the infrastructure required in accordance with the requirements of the 'economic role'; and,
- the wider definition of 'healthy communities' may not have been considered when preparing the document.



If the provision of the infrastructure requirements makes the developments unviable in financial terms then the Plan becomes unviable and unsustainable. In addition, without the required infrastructure funding for the police service and other public sector providers, where there is no alternative funding available, Medway Council will not deliver safe and accessible environments/developments as required under the NPPF again resulting in the delivery of unsustainable developments across Medway.

b. Part 7 Para 58 (under 'Requiring Good Design') states, amongst other matters: 'Planning policies and decisions should aim to ensure developments:

- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion;'

Again, it is the view of Kent Police that Medway Council may have looked at the Part 7 elements in isolation and not considered the wider definition of 'healthy communities' when preparing the document. The outcome will be that without infrastructure funding for the police service and with no other indication provided as to how 'safe and accessible environments' will be provided, Medway Council will not deliver safe and accessible environments resulting in the delivery of unsustainable developments across Medway.

4. Kent Police notes infrastructure requirements for the emergency services do not appear to be reflected in this document. Bearing in mind the above Inspector's Report, this appears to be a significant shortcoming in the document.

5. Infrastructure Funding Requirements:

Kent Police advises Medway Council it has reviewed its infrastructure requirements for Medway based upon the Draft Plan growth in dwellings and associated population. It has also reviewed the methodology used in calculating the contribution amount requested. This is to ensure the application is compliant with recent planning decisions/case law and includes up to date construction costs for staff accommodation and custody facilities based upon recent commissioning of such matters. Kent Police has also updated the crime and incident data utilised to calculate the: current demand for policing services; projected growth in demand for policing services directly associated with the planned growth; and, amount of contributions required to maintain the level of service to the existing and growth population.

Kent Police can advise its infrastructure requirements resulting from the growth in population of c50,200 people generated by the proposed new and additional 29,463 dwellings are:

- a. Between 1 February 2016 and 31 January 2017 there were 31,259 crimes and Anti-Social Behaviour incidents recorded by Kent Police for the Medway Council area requiring police intervention.
- b. The current population of Medway is estimated, by a number of different sources, to be c280,000 .
- c. The current crime & disorder incidents per 1,000 population therefore equates to 111.64 incidents/annum.
- d. Based upon the Plan contents the population of Medway will increase by 50,200 to 330,200 during the Plan period (+17.93%).





12m2 minimum (inclusive of all necessary security; storage; parking, including operational police vehicles, etc., requirements). The contribution Kent Police requests in order to fulfil this requirement is £14,079,000.

- k. Kent Police confirms it has sufficient custody accommodation within Medway to meet the growth in demand for such from the new and growth residents. This is because when Medway Police Station was built projected custody demand growth to 2034 was included.
- l. Kent Police will also incur one off infrastructure start-up costs for each member of new staff (as above) as follows:

Item	Police	PCSO	Special Constable	PSE
<b>Uniform</b>	£603	£603	£603	
<b>IT Equipment:</b>				
Computer	£825	£825		£825
Body Cam	£550	£550	£550	
Smart Phone	£229	£229	£229	
Radio	£420	£420	£420	
<b>Protective Equipment</b>				
Pava Spray	£9		£9	
ASP	£58		£58	
Handcuffs	£17		£17	
Stab Vest	£402	£402	£402	
<b>Vehicle (contribution)</b>	£2,119	£2,119	£2,119	
<b>Furniture</b>				
Desk (70% total cost Police/PCSO)	£84	£84	£84	£120
Chair (70% total cost Police/PCSO )	£74	£74	£74	£105
Pedestal	£104	£104	£104	£104
<b>Total</b>	<b>£5,494</b>	<b>£5,410</b>	<b>£4,669</b>	<b>£1,154</b>

- m. The total Developer/CIL contribution Kent Police would require to meet all its infrastructure requirements directly generated by the proposed developments is:

Item	Cost
Staff accommodation costs	£14,079,000
Custody accommodation costs	£0
Officer infrastructure start-up costs	£263,712
Special Constable infrastructure start-up costs	£32,683
PCSO infrastructure start-up costs	£32,460
PSE infrastructure start-up costs	£5,193
<b>Total Contribution Required/Requested</b>	<b>£14,413,048</b>

This equates to £489.19/new and additional proposed dwelling.

6. Kent Police, in general, operates a centralised policing model. This is to maximise resources whilst at the same time ensuring the cost of delivering policing services to the public is kept



to a minimum. There is, however, one exception relevant to this consultation that is it has an additional small operating base on the Hoo Peninsula owing to the geography of the area and this has been taken in to consideration when the above infrastructure calculations were made. Kent Police does not operate from numerous local community hubs. If Kent Police operated from such Hubs it would require more resources and infrastructure than identified within this response resulting in it requiring significantly more contributions for new and additional infrastructure associated with the proposed dwelling and related population growth. On this basis, if it is the intention to include emergency services infrastructure within local 'Community Facilities' this would not be compatible with the policing model nor would it be a cost effective option for the public and developers. Similarly, one suggests the same applies to hospitals and schools. With the current rationalisation to accommodate new reduced budgets it is most unlikely hospitals (if they ever were) will be provided locally and, in many cases, schools. Indeed, Health (hospitals) appears to be moving to 'centres of excellence' where the 'local provision' may be some considerable miles away from the proposed development and may even be outside of the local authority area. So, if 'off site' locations are acceptable, under planning terms' for Health, Education, etc., then the same principle must apply to policing.

### **Planning Policy Justifications for Policing Contributions:**

#### **NPPF: Para 204 Planning Obligation Tests:**

#### **Necessary to Make the Proposed Development Acceptable in Planning Terms:**

The creation of safe, healthy and attractive places to live is fundamental to planning for sustainable development. The police play a key role in helping to deliver sustainable communities and are recognised nationally as key stakeholders in providing social infrastructure needed to support development.

The police service is, like most of the public sector, a population-based service and where there is an increase in population research has shown that there is an accompanying increase in levels of crime and disorder and for other policing services and interventions. It is an undeniable fact, as with the services provided by other public sector organisations (Education; Health' etc.), that new and additional dwellings of the magnitude proposed within the area and the associated growth in population will place significant greater demands on policing services particularly as these dwellings will be built on a Greenfield Site where there is currently no or minimal demand for those services. History shows there will be a corresponding increase in demand from new residents for policing across a wide spectrum of police support and intervention services as they go about their daily lives. The Kent Police has provided details of the impact of this increase in demand upon its business and infrastructure above. Projecting that level of growth the Kent Police would have to increase its workforce and/or its technical and other infrastructure bases in order to meet its customers' needs. Policing is no different to other public sector service providers and is in the same position as: Health (more medical staff/surgeries/hospital beds required); Education (additional teachers and school places required); etc. Policing does, however, differ from most other public service providers in one key way in as much the demand for its services is not restricted to the development area but is spread further across the council area and County as development residents go about their daily business.

There is no existing central or local taxation funding source to support this infrastructure growth. The Police Service does not receive sufficient central capital funding for new growth related development. The funding allocated via Home Office grants and other specific limited funding is generally insufficient to fund requests for capital expenditure whilst, at the same time, there is a time lag associated with the Police receiving operational revenue funding. As previously advised, income from the Council Tax Precept cannot be utilised for Capital expenditure.



Therefore without the receipt of proportionate contributions from new development towards addressing the greater demands on policing generated by the proposed developments, staff and equipment would need to be redeployed across the county resulting in less staff per head of population in the area and elsewhere to meet the increase in demand for policing services from the existing and growth population.

Secondly, officer safety would be put at risk as new and additional staff would have limited communication equipment as the Kent Police would not be funded for such new equipment. The alternative is policing resources would be more thinly deployed with the resulting negative impact on service delivery to the public which may include responses to incident reports.

Therefore, without planning contributions towards police infrastructure it is likely that policing will be adversely impacted upon and the creation of safe communities jeopardised. This would be directly at odds with the key planning objective to provide safe, sustainable communities.

The provision of adequate police infrastructure commensurate with the scale of population increase is necessary to support community safety and to manage crime and the fear of crime to achieve sustainable communities.

### **Directly Related to the Proposed Development:**

There is a functional link between the proposed developments and the contributions being sought as the costs associated with providing additional policing infrastructure would not be incurred without the impact of the proposed development. As set out above, the residual population on the proposed sites is either zero or negligible.

Secondly, the fact that funding for the additional infrastructure is requested by the Kent Police illustrates the link between the proposed development and the contributions being sought.

There is evidence that an increase in population arising from new developments results in an increase in incidents of crime and disorder and, and demand for other policing services/interventions, which would impose greater pressures on the existing police service. In addition, new development inevitably creates targets for crime which requires a visible police presence to reduce the perception of crime and respond effectively to incidents of crime.

Put in simple terms, if there was no development there would be no need for additional police resources/infrastructure and a resultant contribution. The guiding principle is that where a development proposal gives rise to an increase in population it will be necessary to increase the number of police officers and support staff responsible for policing that population to ensure the level of service is maintained. New and additional infrastructure, as detailed above, would be required to be delivered to meet the needs of the expanded staffing. As previously explained, there is no existing funding source to support this from central or local taxation.

### **Fairly and Reasonably Related in Scale and Kind to the Proposed Development:**

The scale of the proposed development means there is limited existing policing infrastructure to cater for the increased demand for policing services and interventions generated. This would impair policing service delivery to existing and new (growth) residents in the local authority area/County if the necessary policing infrastructure were not provided for.

The requirement for additional policing infrastructure to support the additional patrol functions required has been identified as a key mitigation measure owing to the potential adverse impact arising from the proposed developments.

The financial contribution sought in this case is not to resolve deficiencies in police infrastructure provision nor does the Kent Police seek to provide a higher level of service. The impact of the proposed developments on the capacity of the Kent Police to provide an efficient and effective service in the context of the Government's agenda for the delivery of safe communities is a material planning consideration and the contributions/infrastructure sought are proportionate to that impact. The requirement for a Planning Obligation to deliver a financial contribution and secure the provision of the additional infrastructure requirements which are a direct result of the proposed development is therefore reasonable in all respects.

#### **Police Entitlement to such contributions:**

In addition to the *Jelson Limited vs Secretary of State for Communities and Local Government* and *Hinckley and Bosworth Borough Council* [2016] cases referenced at the beginning of this consultation response, such infrastructure funding requests have now been the subject of a number of other planning appeals which have been upheld by Planning Inspectors. Kent Police cites the following by way of further example to assist Medway Council with its Local Plan processes:

1. Appeal Ref: APP/Q3115/W/14/3001839;
2. Appeal Ref: APP/Q3115/A/14/2229389;
3. Appeal Ref: APP/Q3115/A/14/2217931;
4. Appeal Ref. APP/K2420/W/15/3004910;
5. Appeal Ref. APP/G2435/A/14/2228806;
6. Appeal Ref. APP/X2410/W/15/3007980;
7. Appeal Ref. APP/T3725/A/14/2221613;
8. Appeal Ref. APP/T3725/A/14/2229398;
9. Appeal Ref. APP/Y2430/A/14/2224790;
10. Appeal Ref. APP/M2460/A/14/2213689
11. Appeal Ref. APP/K2420/A/13/2208318;
12. Appeal Refs. APP/K2420/A/13/2202658 & APP/K2420/A/13/2210904;
13. APP/X2410/A/13/2196928 & APP/X2410/A/13/2196929

If the Kent Police can be of any further assistance in this matter please contact the writer

**Trevor Hall**  
Developer Contributions Manager

cc:





Your ref: development options regulation 18  
Our ref: reg18devption100417

26<sup>th</sup> May 2017

For the attention of  
Catherine Smith, Planning Policy Manager  
by email



Dear Catherine,

**Medway Council Local Plan 2012- 2035  
Development Options Regulation 18 Consultation**

Thank you for inviting us to comment upon your Development Options Report and Interim Sustainability Appraisal. Kent Wildlife Trust welcomes the opportunity to contribute to the process.

**Development Options and Lodge Hill**

The inclusion of Chattenden Woods and Lodge Hill Site of Special Scientific Interest as a development site is of extreme concern to Kent Wildlife Trust. This is a unique, nationally important site that should be valued for its contribution to the nation's, and Medway's, natural heritage.

The Interim Sustainability Appraisal Report states that Lodge Hill is included “...based on the extent of Previously Developed Land on the potential development site, and the council's view that a satisfactory mitigation and compensation package could be implemented.” (Paragraph 4.16). Regardless of the facts of these matters, neither the encouragement of re-use of previously developed land nor the presumption in favour of sustainable development apply to Sites of Scientific Interest as set out in the National Planning Policy Framework (NPPF)<sup>1</sup>. The Sustainability Appraisal process should be an independent, fact-based process that informs the development of the Local Plan in line with the NPPF, and the current approach to it risks the Local Plan being found unsound.

Furthermore, it is not enough to demonstrate that the benefits of development outweigh the impacts on the SSSI, but rather that the benefits that are specific to that location (compared to the alternatives) outweigh the impacts<sup>2</sup>. It would appear that the Council is relying upon the Inquiry into the Lodge Hill planning application to undertake this task for it. At best this risks delays to the Local Plan process, and at worst it risks the Local Plan being found unsound.

The inclusion of Lodge Hill in all four development scenarios does not consider “all reasonable alternatives”, as is a requirement of the Sustainability Appraisal process. In paragraph 4.62 of the Interim Sustainability Appraisal it states: “*In testing the broad locations and approaches for potential growth, consideration will be given to the capacity of areas to accommodate additional development, if Lodge Hill should not be supported through the Public Inquiry process.*” It is not sufficient to state that capacity will be “modified” in each scenario should Lodge Hill not proceed through the Public Inquiry. A large development site such as Lodge Hill, with a suggested capacity of up to 5000 dwellings and associated community infrastructure, will have a profound impact upon housing figures. An additional four scenarios should be provided without Lodge Hill.

<sup>1</sup> NPPF paragraph 111 and paragraph 14 respectively.

<sup>2</sup> NPPF paragraph 118



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It is very difficult to offer any firm comments on the four scenarios provided, as the diagrams and figures provided are not easy to compare to one another. It would have been much more useful if the diagrams represented the scale or quantum of development being proposed for each location in each of the four suggested scenarios. Scenario detail would have been easier to understand if it had been tabulated, rather than descriptive. The lack of clarity regarding the quantum of development each option has the potential to contribute to the OAN is unhelpful, and we would expect such figures to be presented prior to the draft plan publication.

## Capstone Valley

Inappropriate development within the Capstone Valley has the potential to impact upon the ancient woodland and other important habitats, as well as compromise the role the valley plays as a green link between the North Downs and Medway Towns, Darland Banks Local Wildlife Site and Local Nature Reserve and Capstone Country Park. There are also opportunities within the valley to enhance its role as a green link and area of wildlife value in its own right. Piecemeal development of the valley should be avoided, and any development the Council allocates for the area should be designed in the context of the whole valley, with impacts on important habitats avoided and the green infrastructure through the valley enhanced through appropriate habitat restoration and creation.

## Policy Approaches

As the document does not at this stage include any detailed policy or specific site allocations, we would like to make some more general comments regarding biodiversity content.

Kent Wildlife Trust welcomes the “policy approach” to Strategic Access Management and Monitoring, page 63, in order to protect and enhance spaces of international and national importance. We would recommend that the next version of Medway’s Local Plan should continue to have a specific policy in relation to this.

Kent Wildlife Trust commends Medway Council for its policy on “Securing strong Green Infrastructure” (page 65). This is in line with National policy and it should serve the function of maintaining connectivity and providing ecological resilience between protected spaces and the broader countryside at a landscape scale<sup>3</sup>. We note that the Council intends to publish a Green Infrastructure Framework to support the Local Plan. The next stage of preparation of the Local Plan should include a policy clearly referring to this Green Infrastructure Framework and its relationship to the Local Plan. Medway Council should also ensure that an appropriate financial mechanism is provided. The NPPF does emphasise that the planning system should, “minimise impacts on biodiversity and provide net gains in biodiversity where possible.”<sup>4</sup> We recommend that Medway Council make reference to the Kent Biodiversity Strategy<sup>5</sup> in setting appropriate actions and targets for achieving this in the development of their Local Plan documents.

Unfortunately the statement “*A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland*” is undermined by Medway’s support for development at Lodge Hill and Chattenden Woods SSSI. At present the Council are at risk of making the same mistakes that resulted in the withdrawal of the previous attempt at a Local Plan,

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<sup>3</sup> The NPPF states in paragraph 117, that “planning policies should plan for biodiversity at a landscape-scale across local authority boundaries” and “identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation”.

<sup>4</sup> NPPF, paragraph 109, page 25.

<sup>5</sup> <http://www.kentnature.org.uk/assets/files/Nat-Env/Kent-Biodiversity-Strategy-final.pdf>

and we would remind them that the inspector stated “...in considering the balance to be struck between all the dimensions of sustainable development I am not persuaded that the social and economic benefits that would flow from development on this site would outweigh the harm to a site of national importance for biodiversity.”

Kent Wildlife Trust is concerned about the reference in this policy “Securing strong Green Infrastructure (page 65) which states: “*The council will consider the need to protect the special features of...Local Wildlife Sites and Local Nature Reserves.*” This is not strong enough policy wording; active protection of sites of County importance, such as Local Wildlife Sites or Roadside Nature Reserves, is vitally important in order to maintain and enhance the green infrastructure network and protect biodiversity and delivery the aims of the NPPF with regard to biodiversity<sup>6</sup>. We would recommend that Medway should have a specific, separate policy in relation to the protection and enhancement of sites of county importance, such as Local Wildlife Sites and Roadside Nature Reserves. This would better support development management decision-making, as local sites in Kent are increasingly under threat, from both direct and indirect impacts of development, including increased recreational pressure.

The next stage of plan-making should also make policy provision for the protection and enhancement of biodiversity within its allocated sites. This should include clear “development principles” on sites of higher biodiversity value or adjacent to more sensitive sites for nature conservation. Reference should be made to county Biodiversity Opportunity Areas<sup>7</sup> and Kent Wildlife Trust would recommend referring to these in the policy detail. Ashford’s Local Development Framework and its Area Action Plans are a good example of where biodiversity objectives have been included within site-specific “development principles”. Kent Nature Partnership has also produced guidance against which policies can be assessed<sup>8</sup>.

Kent Wildlife Trust understands that a key driver to this plan is the projected significant increase in population of 21.8% in Medway during the timeframe for this plan, alongside economic growth. It is essential that in planning for this projected increase in population, the natural environment is not compromised, in accordance with the NPPF Core Planning Principles.<sup>9</sup>

#### Sustainability Appraisal Documents

Table 2 (Sustainability framework) of the Sustainability Appraisal Interim Report does not include any indicators that would allow the monitoring of the plan against national and local biodiversity policies. We therefore support the statement in the Sustainability Appraisal Scoping Report that Medway recognises there is an evidence gap in this respect, and that the Council will seek other means to gather information (Paragraph D.14). We recommend that the Council engage with the Kent Nature Partnership on this matter, in assessing their monitoring needs and information availability.

Thank you for involving us in the development of this Local Plan. We look forward to commenting on future stages of development.

Yours sincerely

Greg Hitchcock  
Thames Gateway Officer

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<sup>6</sup> NPPF, paragraphs 109 and 114, for example.

<sup>7</sup> <http://kentbap.org.uk/kent-boas/>

<sup>8</sup> <http://www.kentnature.org.uk/planning-policy-advice.html>

<sup>9</sup> NPPF reference, paragraph 17, Core Planning Principles “Planning should contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework”.



Our ref – 13/M/TE00561

Your ref:

Date 18 April 2017

Planning Policy team  
Planning Service  
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Chatham  
Kent  
ME4 4TR

[futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk)

Dear Sir

### **Future Medway Consultation**

The 4 scenarios all, disappointingly, continue to be predicated upon Lodge Hill. This is despite Inspector warning at the last Examination and no progress since, in face of the copper bottomed designation of that land i.e. both in terms of its ornithological value, and ecological value. There is no realistic prospect of that site coming forward, yet all 4 scenarios assume it will. Such a serious flaw in the analysis affects the "4 scenarios" fundamentally, and has wider implications.

The identification of Hoo as a new town, and Medway City Estate being partially relocated, stem from the Lodge Hill site despite it being a nationally designated site of environmental importance. Lodge Hill's promotion is directly contrary to the environmental dimension of sustainable development set out in NPPF. The last examination Inspector urged the Council to take a more pragmatic view, identifying land on the fringes of the Medway towns built-up areas. All 4 scenarios are skewed by such flawed approach.

The Medway towns have 4 mainline railway stations by main shopping areas, surrounded by housing. It is national policy to direct new development to these hubs. The 4 appended maps identify a significant geographical gap between Gillingham and Rainham in the approximate position of the Mill Hill site where a new station would clearly revitalise a wider area to bring growth and reduce emissions. The displacement of City Estate, a well-established, thriving river side employment site, from the centre of the heart of the Medway towns (which is both historically and spatially river focused) is another serious flaw. The policy focus should be to retain employment rather than repel it from the towns. To promote a thriving economy it is irrational to plan to displace employment away from the towns, reducing the draw for existing retail even further.

The Council should, for the first time in decades, now face the reality that substantial new development (just as the last local Inspector's indicated) must be met by growing from the fringes of some of the existing built-up area. There is very significant land available without need to expand villages or displace existing employment. The suggestion (e.g. see scenario 2) that villages would need to take up some of the "pressure" is wholly unjustified. These remote villages are not well served by public transport, their enlargement will simply result in entirely avoidable emissions harming the environment, failing to provide growth where it is needed, contrary to nationally policy that places high priority upon improving public health.

Growth from the urban fringes nearest these hubs is organic, the least intrusive, most sustainable development scenario, to meet objectively assessed need both for new homes and job creation. Expansion in north Gillingham between the hubs south of B2004 would not be on land that is NPPF foot note 9 restricted; it avoids the need to consider building on Metropolitan Green Belt and will be harmonious with City Estate's thriving economy, plus Gillingham Business Park (west and south respectively). New riverside expansion at north Gillingham if well-planned will not be inconsistent with the River's ecosystem; to the contrary the wealth created can be used to direct long lasting improvements to the River which has been so badly lacking for decades.

Yours faithfully

A large black rectangular box redacting the signature of the sender.

Kingsley Smith Solicitors LLP



# KODIAK LAND

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ME4 4TR

By email to: [futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk)

18 April 2017

Dear Sir/Madam

These representations are submitted by Kodiak Land (from here on referred to as Kodiak) in response to the current consultation on the Local Plan Development Options Consultation Document. Kodiak welcomes the opportunity to comment on this version of the Medway Local Plan, and asks to be kept informed on progress with this document.

Kodiak specialises in the promotion of small sites (typically 5-7 acres) for residential development, by working alongside the community to deliver bespoke, high quality, design-led schemes which meet local housing needs and deliver community benefits while also assisting Councils to meet their five year housing land supply requirement.

I enclose a site submission for Land south of Lower Rainham Road, Lower Rainham which Kodiak consider to be suitable, achievable and deliverable within 5 years in line with the guidance in the Framework (para. 47) and in accordance with the findings of the Council's February 2017 SLAA. We submit that this site should be carried forward as a recommended allocation in the next stage of the preparation of the Local Plan.

Kodiak believe that the allocation of this site would be consistent with all of the options identified in the Development Options document, and generally support the Options identified. However, below we make a number of points which the Council should take into account in taking the plan forward to the next stage.

## Policy

The current Development Options consultation proposes 4 key scenarios to help accommodate the challenging housing needs of Medway. It is likely that to meet the needs outlined the Council will need to ensure that all sectors of the house building industry have a range of sites in a range of locations. This will mean that there will need to be small, medium and large sites brought forward in places which range across the 4 development scenarios outlined within the consultation document.

Kodiak consider that of the development options put forward, Scenarios 1 and 2 would be unlikely accommodate all of the housing needs required for the plan period. Scenario 1 focuses on an increased level of urban regeneration to deliver the needed housing, it would require further densification of development sites as well as the relocation and compulsory purchase of employment land. It would also lead to a reliance on flatted development to meet the required housing numbers. It is our view that such a strategy would not deliver the range of sites in the range of locations needed to meet the overall development numbers.

Whilst Scenario 2 would have a greater chance of delivering the required housing numbers, it would require substantial release from the Green Belt and very significant infrastructure expenditure. Our view therefore is that the Council will need to consider an amalgamation of the scenarios put forward to meet the identified need. This will likely require some suburban extension, focused on deliverable sites outside of the Green Belt, brought forward alongside realistic and deliverable brownfield urban regeneration sites, and probably with large focused growth targeted on the Hoo Peninsula.

The benefit of the site put forward by Kodiak is that it is sustainable, outside of the Green Belt and can provide a site attractive to a small and medium size housebuilders and which can be brought forward quickly, to help meet both the overall plan target for housing and the 5 year land supply.

## Conclusion

Kodiak can confirm that enclosed the site is available, offers a suitable location for development now and is achievable with a realistic prospect that the housing will be delivered within five years. We therefore consider that the site should be allocated within the Local Plan, and look forward to taking part in future consultation exercises on the plan.

Yours faithfully

Christien Lee

Planner

Kodiak Land



# **KODIAK LAND**

## **MEDWAY COUNCIL LOCAL PLAN 2012-2035**

Site Submission to the Development Options  
Regulation 18 consultation report

April 2017

# 1 LAND SOUTH OF LOWER RAINHAM ROAD, RAINHAM

## 1.1 Introduction

- 1.1.1 Kodiak is promoting a site at Land south of Lower Rainham Road, Rainham for proposed residential development (see location plan below).



## 1.2 Context

- 1.2.1 The c.3.2ha site is located to the north of Rainham, and comprises numerous small agricultural fields with boundaries formed chiefly of hedgerows and mature trees. To the north of the site beyond the B2004 Lower Rainham Road lies open countryside, to the west of the site is a small allotment and wooded area forming part of the Berengrave Nature Reserve. Existing residential development abuts the site to the south, and to the east is a mixture of existing residential development and scrubland. Residential development of the site would be in keeping with existing abutting land uses and a logical infill of development.
- 1.2.2 The site lies adjacent to Rainham which is a sustainable settlement with a wide range of services and facilities. Within 2km of the site there is a primary school, convenience store, shops, public houses, railway station, and a public park. All of these facilities are easily accessible from the development site via safe walking routes along footpaths adjoining well-lit highways or by the use of frequent public transport services.

1.2.3 The site lies within 400m of a bus route with up to 5 services per day to Sittingbourne and 6 services per day to Chatham (Monday-Friday) which provide for a range of higher order services. A short distance from the site is Rainham railway station which is served by up to 5 services per hour to London (St Pancras or Victoria) with journey times inside one hour. Services also run to Stratford International, Ramsgate, Faversham, Canterbury and Dover.

1.2.4 Rainham is capable of hosting additional residential growth which will help to sustain and enhance the existing services and facilities in the town. The site is located in a sustainable location within Rainham; indeed, an appeal decision on a nearby site at Station Road, Rainham (APP/A2280/W/15/3002877, December 2015) confirmed that *“the site is well located in terms of shops, services and transport links”*.

### **1.3 SLAA**

1.3.1 The February 2017 SLAA document identifies the promotion site as part of a wider site “00849” which is assessed as suitable and available for development within 5 years. Kodiak supports this assessment and thinks development of the site can contribute to the Council achieving a 5 year housing land supply.

### **1.4 Local Plan Development Options**

1.4.1 The Local Plan Development Options document outlines a number of broad strategic options for the location of the substantial quantum of new housing which is required between 2012 and 2035. Kodiak considers that the development of the site at Lower Rainham Road would be consistent with all of the development options identified, as it is recognised that the district’s constraints mean that new housing will need to be delivered from a range of sources.

### **1.5 Conclusion**

1.5.1 Kodiak can confirm that the site is available, offers a suitable location for development now and is achievable with a realistic prospect that the housing will be delivered within five years. We therefore contend that the site should be allocated within the Local Plan.



Medway Council  
Pembroke (Compass Centre) Chatham  
Maritime  
Chatham  
Kent  
ME4 4YH

**Our ref:**  
**Your ref:**

KT/2006/000047/CS-04/PO1-L01

**Date:** 14 March 2017

Dear Sir/Madam

### **Notice of Regulation 18 'Development Options' Consultation**

Thank you for consulting us on the above. We apologise for your delay in responding but hope you find our comments useful.

#### **Flood Risk**

We are pleased to note that flood risk has been identified as a key consideration within the Local Plan. We look forward to working with the Council to develop a suitable policy covering flood risk.

We would welcome further consultation on specific housing development site allocations.

#### **Water Resources**

We are pleased that the Council is proposing to adopt the higher standard for water efficiency in new homes of 110 litres per person per day. This is appropriate in view of our classification of the area as one of "serious water stress". We would also hope to see some requirement for commercial developments to meet one of the higher BREEAM classifications.

#### **Groundwater and Contaminated Land**

We attended the workshop and raised a number of points related to the issues consultation. We re-iterate them here:

We would request that water quality is covered in the environment section, Medway is significantly dependent on groundwater supply from aquifers for its public and commercial water supply. This should be recognised and any development with potential impacts on the water quality in aquifers or in surface waters should ensure controlled waters are safeguarded from detrimental effects. Groundwater is also important for agricultural supply.

Under infrastructure sections, drainage provision is critical to again ensure detrimental effects are avoided. SuDs are welcomed as part of flood prevention and assistance to biodiversity, but infiltration drainage is not always viable on some developments, especially on Brownfield sites.

Certain types of development have a high pollution potential and areas designated as SPZs should be prevented from being brought forward for high risk developments, as outlined in our GP3 document.



Brownfield development is welcomed to address historic contamination burdens, but these sites need to be developed in accordance with best practice and not all sites are viable for all types of development use.

Sections on minerals and waste provision should be clearer on what is a suitable use in sensitive locations.

### **Fisheries, Biodiversity and Geomorphology**

It is not really clear how the different options will benefit, damage or provide opportunities for ecological interests as there is a lack of detail or 'high level' assessment of likely impacts on how development could secure GI.

Therefore we cannot provide feedback on the best approach, although development that extends into or close to priority habitats and/or designated sites, will by their nature have significantly more impact, and potentially fail to deliver biodiversity net gains.

We recommend that different options for development are tested against what could be delivered or damaged, to demonstrate how designated sites, priority habitats and potential new habitats could be affected.

It is good to see the general comment that the council will support delivery of more nature conservation, particularly when considering the management of tidal embankments along the Medway estuary area.

However, the provision of 'green infrastructure' (GI) needs to state that a net gain in biodiversity is required and that the council will positively work towards achieving that through the development control process, and also facilitate delivery.

On this basis the council should propose working with the EA and other partners to propose new GI that delivers multiple benefits (resolving coastal squeeze, new flood defences, recreation, ecology, tourism etc.)

It would be helpful to specifically mention the Medway Estuary and Swale Strategy as well as Thames Estuary 2100 and the requirements therein.

Specific policy area comments:

- Policy approach on proposed marinas and moorings needs to be explicit that there should be no loss of protected or priority habitats or species (those listed under the NERC Act 2006) unless the impacts are not significant at a waterbody scale, and can be adequately mitigated for.
- All new marinas and moorings will have to assess their impact on Thames River Basin Management Plan.
- The Environmental and Green belt designations in Medway does not include Local Wildlife Sites, which are a consideration for the planning process. It could also include ancient woodland, which is also available data.

If you have any queries please do not hesitate to contact me.

Yours faithfully

**Ms Jennifer Wilson**  
**Planning Specialist**

Direct dial [REDACTED]

Direct e-mail [REDACTED]

Medway Council  
Pembroke (Compass Centre) Chatham  
Maritime  
Chatham  
Kent  
ME4 4YH

**Our ref:** KT/2006/000047/SE-05/SP1-L01

**Your ref:**

**Date:** 20 April 2017

Dear Sir/Madam

### **Medway Local Plan - Sustainability Appraisal Scoping and Interim reports**

Thank you for consulting us on the above. We have the following comments to make.

#### **Groundwater and Contaminated Land**

There is very little mention of Brownfield sites, passing mention here and there and a bit about formal process for Contaminated Land in Appendix A section 3. There should be mentioned the PIP and Brownfield registers as well, given its imminent introduction before plan is fully formulated and sent to inspector. The scope should also cross reference impacts from land affected by contamination/brownfield site on water quality and relevant interventions through life of plan to reduce historic contamination impacts.

Water quality decision are very river based, need to include groundwater quality issues, perhaps also alongside water resources and "water stress" that development would pose if current resources are not managed and "protected".

There should also be a link to wellbeing policies to derelict land clean up, reduction in vandalism and development of brownfield/public open space use perhaps, such as proposals for Queen Elisabeth fields/Woodland closed landfill - Managing risk and enhancing public health and wellbeing opportunities.

With the public announcement of the third Thames crossing we would recommend your Local Plan recognises this development and the potential impacts, as it is a cross-boundary issue. This could affect development opportunities, aspirations in the Cliffe, Hoo areas.

#### **Flood Risk**

We are pleased to see that the Sustainability Appraisal includes objectives and reference to flood risk and climate change.

#### **Water Resources**

***Scoping report p14, p108, p112 and Interim Sustainability Appraisal Report Appendix 2 Pages 6, 15, etc***

Objective 6 issues: The use of the term "water stress" in the statement "There are areas of water stress in the Authority" might cause confusion, because the Environment Agency has a classification of "water stressed areas" and the whole of Medway, indeed the whole of South-East England is classified as a water stressed area. This is from the point of view of water supply, and the interconnectivity of the network means that the same level of stress applies to a wider area than the Medway UA. (<https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>).

Environment Agency  
Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH  
Customer services line: 03708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)





This definition is recognised in Scoping report p58, but the use of the term in the Appraisal Report seems to be less specific and perhaps ambiguous. There it seems to relate to either the excess, the shortage, or the distribution of water as affected by climate change (e.g. p135 in respect of flooding, p188 seemingly of pinch points in the supply infrastructure). Areas prone to flooding will be localised whereas for water shortage in the environment, the estuary and all the river catchments in the area are classified as at risk, or probably at risk of deterioration under the Water Framework Directive (WFD).

#### ***Scoping report p101***

Considering the above, it is unclear to me what specifically is meant by Indicator 6 of objective 6. Our classification is unlikely to change in response to a single LA's plan. Might a better indicator be status of waterbodies under the Water Framework Directive classification? The last bullet of the questions here refer to the Code for Sustainable Homes but this is no longer in use and should be deleted (see also 6 below). For "water stress" in the context of this bullet point it might be better and more consistent to substitute "water efficiency".

#### ***Scoping report and Interim Sustainability Appraisal Report***

Table 1: The only objectives listed for the water environment are "To adapt and mitigate the impacts of climate change" and "Making the best use of natural assets". Should there perhaps be mention here of helping to achieve the objectives of the Water Framework Directive (WFD), both of no deterioration in status and of achieving good status/potential. The Scoping Report mentions it on p126, and recognises that the Plan needs to take account of it.

#### ***Interim Sustainability Appraisal Report Appendix 2***

Pages 46, 51, 57, 82: The comment "Building regulations incorporate mandatory design considerations regarding climate change. The policy approach does not require any further detailed considerations beyond satisfying the principles of sustainable development." seems inconsistent with our understanding, and with pages 89 and 149 here, which contain the comment "Meet energy efficiency targets and the higher national water efficiency standard". This should apply to the above numbered pages as well, not just to self-build homes. For water efficiency it is an option, which we understood Medway had chosen, for a local authority to require a design standard of 110 litres/person/per day, over and above mandatory building regulations (where the standard is 125 litres). This is appropriate for a water stressed area with regard to both climate change and other considerations.

#### ***Interim Sustainability Appraisal Report Appendix 2***

Pages 62, 67, 172, 174, 184: The same comment as above appears. Here the domestic standard does not apply, but for commercial buildings we would like to see the council setting some requirement to meet one of the higher BREEAM classifications.

#### ***Scoping report p156***

The Code for Sustainable Homes is no longer in use and reference should be removed. It is superseded by the Building Regulations (and options therein) and in any case the remarks here are inconsistent with those on p155 under "Housing Standards Review". Should note that the Building Regulations &c. (Amendment) Regulations 2015 themselves be listed in this table? They appear to be absent.

#### ***Scoping Report p162***

Catchment Abstraction Management Strategies (CAMS) are now called "Abstraction Licensing Strategies (ALS)". It might be worth mentioning that the River Basin Thames Management Plan (sic, actually the Thames River Basin Management Plan) is the strategy for implementing the WFD.

### **Scoping Report p163**

The "North Kent and Swale Catchment Abstraction Management Strategy Final Strategy April 2004" is superseded by the North Kent & Swale Abstraction Licensing Strategy February 2013". The next CED for North Kent & Swale CAMS is 2023 and the subsequent one is 2029. However the Medway UA area falls entirely inside the "Medway abstraction licensing strategy" (February 2013) area.

### **Scoping Report p164**

Similarly the "South East Water Resources Management Plan (2010-2035)" is superseded by the "South East Water Resources Management Plan 2014" which covers 2015-2040. Consultation will soon be underway on draft 2019 plans (2020-2045). However the majority of the Medway UA area is supplied by Southern Water, for which the latest plan is entitled ["Water Resources Management Plan 2015-40"](#)

### **Fisheries, Biodiversity and Geomorphology**

#### ***Objective: The conserve and enhance existing green space***

Unfortunately this objective doesn't include any biodiversity indicators. It would be good to see something for improving the ecology of existing greenspace as part of the enhancements.

#### ***Objective: To adapt and mitigate the impacts of climate change***

##### **1. Number of developments incorporating SuDS**

This could record where SuDS have biodiversity benefits. E.g. number of green roofs or new ponds/ swales created.

##### **2. Amount of grazing marshland affected by rising flood levels/flood zones**

Unclear why this indicator is chosen. What does 'affected' mean? Does it matter if grazing marsh is "affected"? Is it significant, or are there ecological benefits even?

An indicator needs to be clear what it is showing. We would suggest that accurate habitat mapping of all important habitat types and their coverage should be used and then in the future this can be compared with the baseline. The Kent and Medway 2012 habitat maps coupled with any updates since that time (Natural England and Kent Wildlife Trust/KMBRC may be able to provide annotations to that baseline.)

##### **3. Amount of open space and allotment provision**

We support this.

##### **4. Quality of biodiverse areas - designated (for consistent information) and undesignated where information is available to demonstrate an increase in biodiverse areas and quality of these areas.**

We would ask the "quality" is defined. We would suggest that as well as the habitats (suggested above) that important species are targeted for these areas that are more likely to be at risk from development from a planning perspective. For example there might be particular bird or aquatic species vulnerable to increased activity in the estuary.

We hope you find our comments useful.

Yours faithfully

**Ms Jennifer Wilson**  
**Planning Specialist**

Direct dial 0208 474 6711

Direct e-mail [REDACTED]



3 January 2017

Minerals & Waste Planning Policy Team  
Kent County Council  
1<sup>st</sup> Floor, Invicta House  
County Hall  
Maidstone  
Kent ME14 1XX

16 Titan Court  
Laporte Way, Luton  
Bedfordshire LU4 8EF  
Tel: 01582 725067  
Fax: 01582 482688

By Email

Dear Sir/Madam,

**Replacement Kent Waste Local Plan  
2<sup>nd</sup> Call for Waste Sites  
Consultation from 5 December 2016 to 30 January 2017**

## 1. Preamble

KTI Energy Limited (KTI) on 21 April 2015 gave personal evidence to the Inspector of the Kent Waste Local Plan. Jonathan King in his Report dated 26 April 2016, under s.110-114, made specific reference to a Representor, without naming him, advocating continuing development of a renewable CHP scheme supplying Ebbsfleet Garden City and London Paramount Entertainment Resort with low carbon electricity and heat. KTI was that Representor taking advantage today for the Call for Waste Sites to enable progression of the project presented herein to Kent County Council in its entirety.

Dartford Borough Council, through Policy CS23 of its Local Plan, calls for a renewable CHP scheme serving Ebbsfleet Garden City and Swanscombe Peninsula. The Secretary of State enacted Ebbsfleet Development Corporation (EDC) to plan utility infrastructure. Homes & Communities Agency is assisting EDC with that infrastructure in compliance with s.2.5.26 and s.2.5.27 of National Policy Statement for Renewable Energy Infrastructure 2011, s.97 of National Planning Policy Framework 2012 and s.1 and s.4 of National Planning Policy for Waste 2014. Evident from recent communication with EDC is that this is a work still in progress.

The Inspector, Mr King, reported his uncertainty on whether the renewable CHP scheme, fired by a blend of virgin/waste biomass fuel, was in fact a waste management facility – a subject which KTI is currently discussing with Dclg and Planning Inspectorate but which should not concern Kent County Council or Dartford Borough Council at the present time.

## 2. Optimum Location of CHP Plant

On the recommendation of Gravesham Borough Council, KTI withdrew Northfleet Riverside in favour of a green field site at Springhead. The latter is heavily degraded by



existing electricity infrastructure, Roman remains and slope. But it is excellently located to construct a primary district heating main running north under the A2 trunk road, has easy access to the National Grid high pressure gas pipe at Southfleet, and easy road access from the Pepperhill roundabout on said A2 trunk road.

The selected location shown in Annex 1 enters negotiation with UK Power Networks on which 400kV, 132kV and 33kV overhead and underground cables may require diversion to create a 5.5 ha unobstructed site. Furthermore, frequently neglected when sites are proposed, an equal additional area is available adjacent for a construction laydown area. Notwithstanding its slope, the overall site shown in Annex 1 appears unique for the application and should be entered into the Replacement Kent Waste Local Plan for examination in public.

### **3. Advanced Waste Management Compatible with Renewable CHP Scheme**

A renewable CHP plant fired by virgin/waste biomass fuel, serving a major community like Ebbsfleet Garden City with low carbon electricity and heat, is not a waste management facility (incinerator) according to Environment Agency. Confirmatory evidence is provided by Slough Heat & Power and cement kilns fired by the same type of fuel. **Should that renewable CHP plant proposed by KTI at Springhead be entered into the Replacement Kent Waste Local Plan or not?**

Annex 2 contains recent correspondence with Homes & Communities Agency:-

- a) ownership of the renewable CHP plant and its district heating network as power project is recommended to be held by residents and businesses of Ebbsfleet Garden City - no recommendation is made for them to own a waste disposal incinerator;
- b) unless the CHP plant is entered into the Replacement Waste Local Plan for examination in public the local opportunity it presents to remote waste authorities, household and non-household contractors/processors working in London, East Sussex and Medway, including those managing agricultural and forestry residues, will remain unknown to them.

The recommendation made to Dclg and Planning Inspectorate is that the site of a community-led renewable CHP plant fired by a blend of virgin/waste biomass fuel should be examined in public as for a **waste related project**.

### **4. Specification of Virgin/Waste Biomass Fuel for Power Generation**

Annex 3 describes the specification of 600,000 t/a virgin/waste biomass fuel sought from outside waste contractors/processors for delivery by road to the renewable CHP plant at Springhead in 23-25 tonne loads. Consistent particle size, c.v and ash content will ensure the electricity and heat output of the CHP plant will be equally consistent for supply to its customers. KTI makes no recommendation where those Material Recovery Facilities (MRFs) should be located. Equally, KTI makes no recommendation where the Fuel Refining Plant, a low-cost innovation, should lie except that it should be remote from the site of renewable CHP plant at Springhead.



## **5. Extensive District Heating Networks**

On the understanding that the 2<sup>nd</sup> Call for Waste Sites will be subject to independent examination in public, the question which Dclg and Planning Inspectorate will have to address is whether its Inspector will have to judge sound the extensive district heating network attached to the renewable CHP plant at Springhead.

Annex 4 is extracted from "Ebbsfleet Implementation Framework 2016" with KTI superimposing the CHP plant and primary district heating main upon relevant utility documents. EDC has not yet taken account of Policy CS23 of the Dartford Local Plan. Neither EDC nor Dartford Borough Council appear to employ an expert CHP engineer in respective office. KTI has already recommended to Dartford Borough Council to approach Beis for grant to employ Ramboll to perform that task.

The target 60,000kWth to 75,000kWth anchor heat load is not irrelevant to a waste planning authority like Kent County Council. Every incinerator generates electricity but few also generate heat to make the transition to a renewable CHP scheme. Not every renewable CHP scheme fired by virgin and waste biomass fuel makes the transition to a good quality CHP scheme which the European Union encourages under its R1 Energy efficiency formula.

When KTI advocates circa 50MWe low carbon electricity generation and up to 75MWth heat generation by the renewable CHP scheme we are in fact seeking to raise the official status of the overall project to Recovery. KTI has received no guidance from Dclg or Planning Inspectorate on the economic benefit to the Ebbsfleet community of their renewable CHP scheme attaining that pinnacle of excellence.

## **6. Competing Projects**

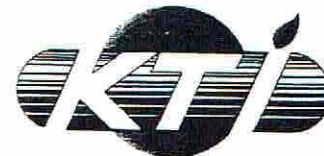
The Communities Secretary who enacted National Planning Policy for Waste 2014 advocated the benefit to be felt is principally by locally-led villages, towns and cities and not industry. The Kemsley mill owned by DS Smith already possesses an efficient gas fired CHP scheme: replacing it with a virgin/waste biomass fuel fired renewable CHP scheme will add not one kilowatt of new electricity and heat generation capacity which SE England desperately needs.

Kent County Council needs to think carefully about the future of the Allington incinerator which destructs 500,000 t/a waste but generates not one kilowatt of low carbon heat to mitigate climate change. The possibility of the Allington incinerator competing for fuel with the EbbCHP renewable CHP scheme should be strongly discouraged.

Kent County Council also needs to think carefully about the 3.2 million t/a fuel feedstock exported to mainland Europe. The Environment Agency expresses concern as does Defra. Springhead undoubtedly will be a significantly cheaper outlet for fuel to specification than Hanover or Rotterdam.

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## **Annex 1**



18 November 2016

Steve Carlow  
Major Connections Manager  
UK Power Networks  
Parkwood Industrial Estate  
Bircholt Road  
Maidstone  
Kent ME15 9XH

16 Titan Court  
Laporte Way, Luton  
Bedfordshire LU4 8EF  
Tel: 01582 725067  
Fax: 01582 482688

By Email

Dear Mr Carlow,

## **Ebbfleet Combined Heat & Power (EbbCHP)**

Many thanks to you and Mark Adolphus for your initial thoughts conveyed by your email of 16 November 2016. UKPN conducted consultation on community-led power projects a few years ago. EbbCHP falls into that category. Prime objective herein is to establish technical feasibility relative to Ebbfleet Garden City.

I attach site plan which you sent showing the criss-crossing of overhead and buried electricity cables. The preferred and alternative location of renewable CHP plant is superimposed. As previously advised, UKPN and NG routes would need to be relocated in conjunction with the 132kV teed connection.

Our objective is to run the district heating main and 11kV cable under the A2 trunk road to another sub-station and heat node where shown north of the A2 trunk road. The intention is that all new properties to be built within Ebbfleet Garden City will be connected to this 11kV sub-station and heat node via LV wires and secondary/tertiary heat networks. While the heat networks will be under the control of the CHP plant. I have no strong feelings as to whether UKPN will finance and own that 11kV sub-station and all wires leading from it except, of course, that all low carbon electricity flowing through those wires emanates from the CHP plant and not from a competitor.

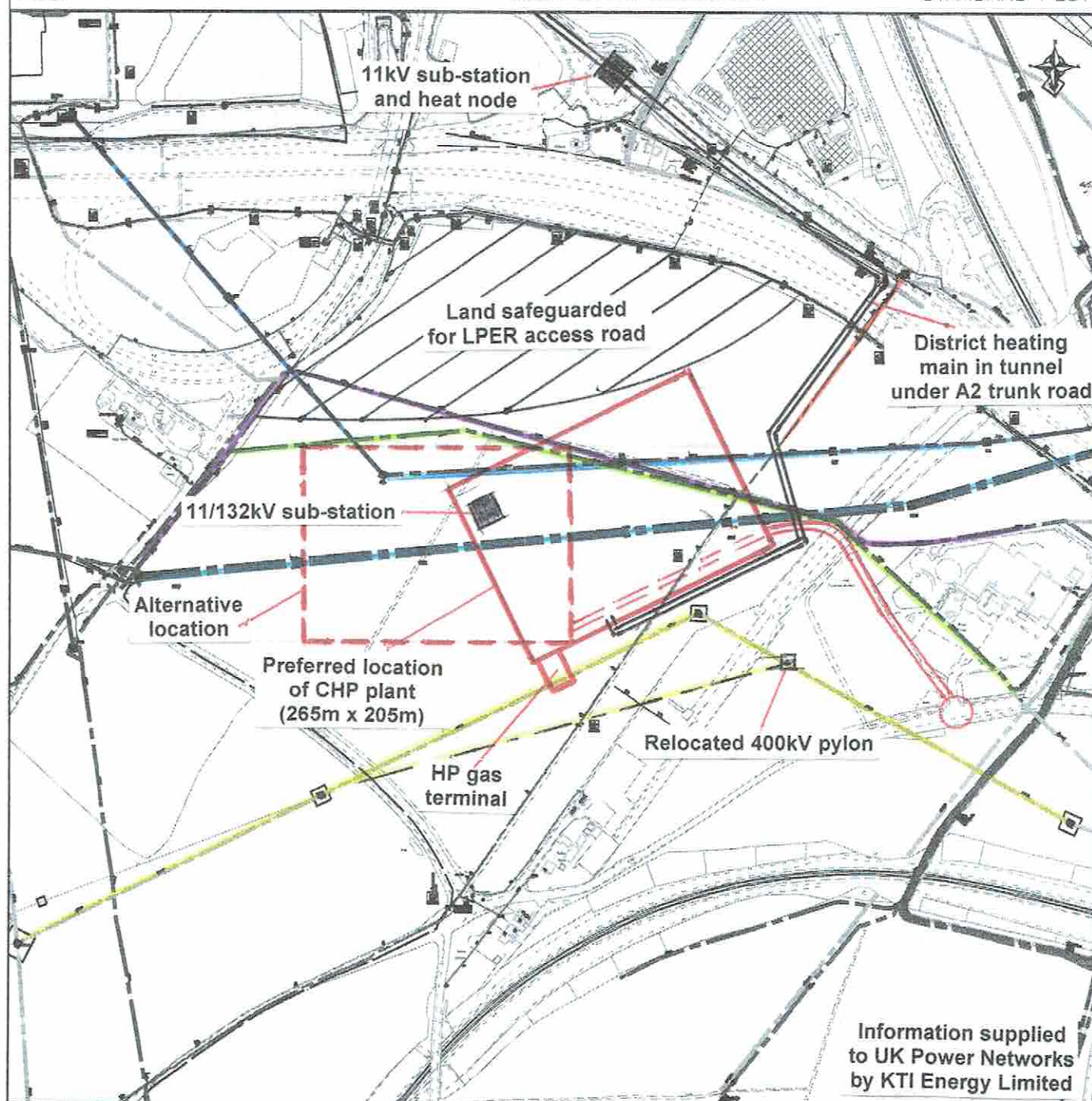
The one concern I have with the access road and new bridge over the A2 trunk road, which LPER plans, is that its design should not permit some drunken oaf to drive his truck/car over the parapet to fall onto our energy infrastructure. I am afraid consultants acting for LPER severed discussion with KTi Energy Limited on our community-led CHP proposal for reason never explained.

Our plan allows UKPN to partner the community-led renewable CHP scheme without infringing upon your statutory inability to proactively invest in its generation component.

Yours sincerely

Dr Bill Temple-Pediani  
Managing Director





The quality and accuracy of any print will depend on your printer, your computer and its print settings. Measurements scaled from this plan may not match measurements between the same points on the ground.

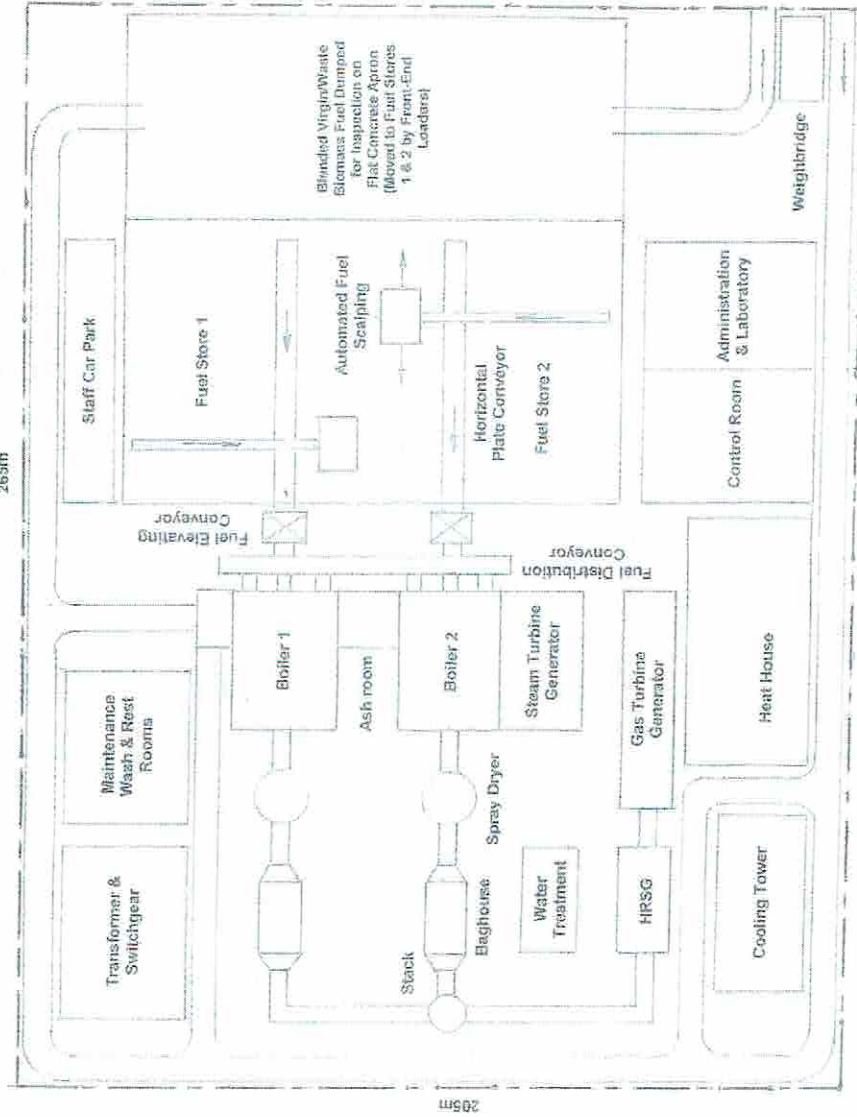
<p>LV Cable or Line</p> <p>HV Cable or Line</p> <p>EHV Cable or Line</p> <p>Approx. position</p> <p>Ductline</p> <p>Pole &amp; Street Furniture</p> <p>Substation &amp; Link Box</p> <p>Contact UK Power Networks on 0800 056 5866 for details of EHV Cable routes before commencing work.</p>	<p>1. The position of the apparatus shown on this drawing is believed to be correct but the original landmarks may have been altered since the apparatus was installed.</p> <p>2. The exact position of the apparatus should be verified - use approved cable avoidance tools prior to excavation using suitable hand tools.</p> <p>3. It is essential that trial holes are carefully made avoiding the use of mechanical tools or picks until the exact location of all cables have been determined.</p> <p>4. It must be assumed that each property and item of street furniture has an electricity supply. Service cables shown only where known.</p> <p>5. All cables must be treated as being live unless proved otherwise by UK Power Networks.</p> <p>6. The information provided must be given to all people working near UK Power Networks plant &amp; equipment. Do not use plans more than 3 months after the issue date for excavation purposes.</p> <p>7. Please be aware that electric cables/lines belonging to other owners of licensed electricity distribution systems may be present and it is your responsibility to identify their location.</p> <p><b>Plan Provision</b></p> <p>CHECK IT OUT BEFORE YOU DIG IT OUT</p> <p>CALL 0800 056 5866</p> <p>EMERGENCY - If you damage a cable or line</p> <p>Phone 0800 056 3766 (24hrs) URGENTLY</p> <p><b>ALWAYS LOOK UP BEFORE YOU START WORK</b></p> <p>Refer to HSE Guidance note GS6</p>	<p>Grid Ref: TQ 61405 72305</p> <p>Scale: 1:5735</p> <p>(When Plotted at A4)</p> <p>Plotted on: 16/11/2016</p> <p>Plotted by: Steve Carlow</p> <p>1. UK Power Networks does not warrant that the information provided to you is correct. You rely upon it at your own risk.</p> <p>2. UK Power Networks does not exclude or limit its liability if it causes the death of any person or causes personal injury to a person where such death or personal injury is caused by its negligence.</p> <p>3. Subject to paragraph 2 UK Power Networks has no liability to you in contract, in tort (including negligence), for breach of statutory duty or otherwise for any loss, damage, cost, claims, demands, or expenses that you or any third party may suffer or incur as a result of using the information provided whether for physical damage to property or for any economic loss (including without limitation loss of profit, loss of opportunity, loss of savings, loss of goodwill, loss of business, loss of use) or any special or consequential loss or damage whatsoever.</p> <p>4. This plan has been provided to you on the basis of the terms of use set out in the covering letter that accompanies this plan. If you do not accept and/or do not understand the terms of use set out in the covering letter you must not use the plan and you must return it to the sender of the letter.</p> <p>5. You are responsible for the security of the information provided to you. It must not be given, sold or made available upon payment of a fee to a third party.</p>
<p>VISITING AN OPEN POINT? Please mark on this plan all locations visited and open points as found, then return updated map to your Business Unit - Thank You.</p>	<p>Maps produced at 1:2500 scale are LV Geo-Schematics which show LV mains cables and overhead lines (in some cases all voltages). Prior to carrying out excavations you must refer to the 1:500 records to determine the location of all known underground plant and equipment.</p>	<p>Reproduced by permission of Ordnance Survey on behalf of HMSO. (c) Crown copyright and database right 2016. All rights reserved. Ordnance Survey Licence number 100019450. Data has been added to the Ordnance Survey base map; all proprietary rights in such additional data are and shall remain the exclusive property of (c) South Eastern Power Networks plc or London Power Networks plc each being a distribution licensee under section 6(1)(c) of the Electricity Act 1989 for the relevant distribution services area as that term is defined in such licensee's distribution licence. All rights in such data reserved.</p>





KTI ENERGY LIMITED  
16 Titan Court  
Laporte Way  
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Bedfordshire LU4 8EF

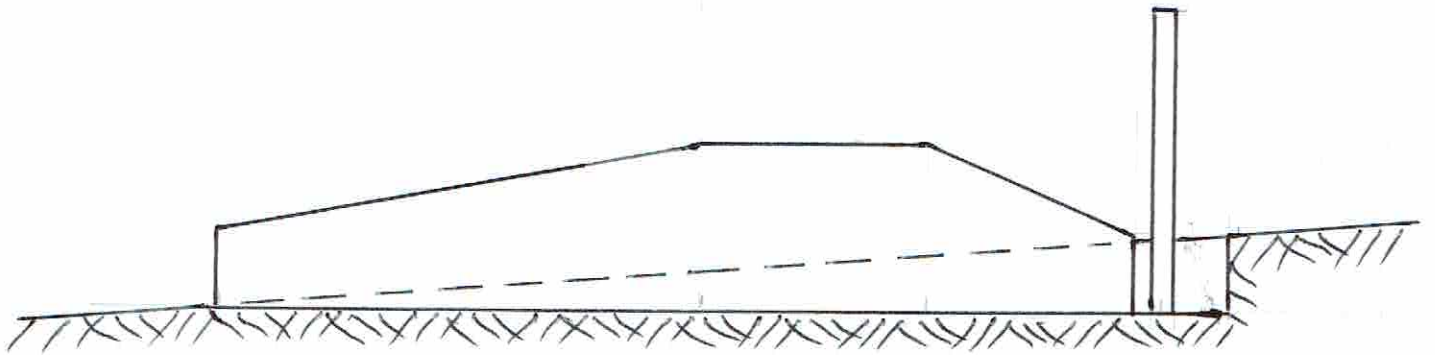
Anodised Aluminium  
or similar Architectural  
Cladding to Main Building



ENGINEERING LAYOUT OF COMBINED HEAT  
& POWER STATION SERVING A  
LOCALLY-LED GARDEN CITY  
WITH LOW CARBON ELECTRICITY AND HEAT

March 2016

Note: Individual components  
may not be to scale  
Modification to Fuel Reception Hall  
November 2016



**LONGITUDINAL ELEVATION OF CHP PLANT  
SCULPTED INTO HILL SIDE AT SPRINGHEAD  
NORTH KENT**

**SCALE: 1 TO 2000**

# BESLEE FARMS

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Hook Green Farmhouse, Hook Green Road, Southfleet, Kent, DA13 9NQ Tel. 01474 834111 Fax. 01474 834614

December 7<sup>th</sup> 2015

Mr R William Temple-Pediani  
KTI Energy Ltd  
16 Titan Court  
Laporte Way  
Luton  
Bedfordshire  
LU4 8EF

Dear Mr Temple-Pediani

**Re: Ebbsfleet Combined Heat & Power (EbbCHP)**

Following our meeting at Hook Green Farmhouse last Monday we write to give you our permission to look into the feasibility of EbbCHP. The area in question is located on our land south of the A2 and you have permission to discuss the planning with the local authorities.

Yours sincerely



Mr & Mrs J Beslee  
(John and Josephine Beslee)  
Mr Charles Beslee

# Archaeological surveys

- Phase 1: walk over geophysical survey
- Phase 2: intrusive surveys determined by results of geophys survey. Likely that there will be a requirement to dig a small number of trial trenches to be agreed with statutory authorities



Figure 1

## **Annex 2**





12 December 2016

Gareth Blacker  
General Manager  
Infrastructure & Complex Projects  
Homes & Communities Agency  
Fry Building  
2 Marsham Street  
London SW1P 4DF

16 Titan Court  
Laporte Way, Luton  
Bedfordshire LU4 8EF  
Tel: 01582 725067  
Fax: 01582 482688

By Email

Dear Mr Blacker,

## **Financing of Community-led Renewable CHP Projects serving Major Communities with Low Carbon Electricity & Heat**

I refer to our meeting on 17 November 2015 at Marsham Street and letter dated 22 November 2016 which you requested to summarise our discussions. The content of that letter remains confidential between ourselves.

Since those dates we have circulated engineering details of advanced waste management amongst West Sussex County Council, Surrey County Council and Kent County Council plagued by the dash for waste incineration promoted by Defra under the previous Labour administration. Capel Parish Council was able to defeat Surrey County Council in the High Court after it consented the Sita incinerator at Clockhouse Works. This type of waste disposal infrastructure is wholly unsuited to the rigours of power/CHP generation serving Locally-led Villages, Towns and Cities currently promoted by Dclg.

I believe I have made myself perfectly clear that our clients, in the case of community-led renewable CHP schemes under development by KTI Energy Limited, are new and existing communities led by Dclg. We have much common ground with builders and host planning authorities. We have less in common with waste planning authorities and their Waste Local Plans when the market is flooded with low-cost waste derived fuel which Defra/WRap encourage for export to mainland Europe.

The purpose of this additional letter is to highlight Part 6 of Infrastructure Act 2015 by which the Secretary of State remains silent about how such community-led renewable CHP schemes are to be financed. In particular, s.38(6) contains those questions I have consistently asked Decc, Dclg and Planning Inspectorate caused by absence of background knowledge displayed by Inspectors appointed by the Communities Secretary to examine Local Plans and Waste Local Plans for soundness.

I am asking you to take on board a recent initiative by Beis to offer £320 million over the next 5 years to local authorities and public bodies to develop district heating networks and appropriate CHP plants. Even though KTI Energy Limited is working on selected CHP schemes on behalf of Dclg, and even though KTI Energy Limited is co-

developing appropriate district heating networks, as a private company we are excluded from applying to this fund. We are therefore forced to persuade host local authorities to apply on our behalf who then commission a consultant to conduct the work over which my company has no official supervisory role to ensure its soundness.

Unlike North London Waste Authority, seeking a DCO for a waste incinerator from the Secretary of State, my firm aim is for both the renewable CHP plant and its district heating network to be owned by a single Special Purpose Vehicle (SPV) in which the host local authority is invited to possess shareholding according to its investment. The SPV will then apply to the Major Infrastructure Unit of the Planning Inspectorate for a DCO for CHP plant and district heating network as a coherent whole. It is clear from past representations made by KTI Energy Limited that Inspectors have next to no experience of such configuration.

s.39(6) refers to the subject of our meeting. Members of a community, of the scale of a Village, Town or City, should be empowered to buy a shareholding in their SPV. A host local authority (ies) is already empowered to raise equity through its Community Infrastructure Levy plus the quantum of monies secured from Beis. You explained at our meeting, that HCA has access to other funds for equity investment at locations where it owns sites which must comply with climate change policies entered into host Local Plans. Those HCA sites coincidentally lie in North Kent, South Essex and West Sussex where KTI Energy Limited remains highly proactive.

Taking our budget costings as reasonably accurate, 20% equity in a £470 million renewable CHP scheme serving a Village, Town or City amounts to £94 million. With the greatest respect, it is unreasonable for Government to anticipate KTI Energy Limited raising this sum for personal enrichment when the combined budgets of Beis. Dclg, HCA and host local authorities seek good quality climate change projects with the objective of community enrichment.

This letter, which I shall share with selected local authorities, makes the planning and financing position of my company clearer than possibly hitherto. The proactive involvement of host local authorities is essential to progress. The proactive involvement of waste disposal authorities is non-essential except where Waste Local Plans are willing to assist additional waste derived fuel from their household waste feedstock.

I look forward to a coherent Government response to our Business Plan with great interest.

Yours sincerely,

  
  
Dr Bill Temple-Pediani  
Managing Director  
KTI Energy Limited



# INFRASTRUCTURE ACT 2015

## SECTION 6: ENERGY AS IT APPLIES TO LICENSED COMMUNITY-LED RENEWABLE CHP SCHEMES UNDER DEVELOPMENT BY KTI ENERGY LIMITED

2

### Consultation Initiated by KTI Energy Limited With:

#### 1. Department for Communities & Local Government

#### 2. Homes and Communities Agency

#### 3. Planning Inspectorate

#### 4. Selected Local Authorities

### Part 6

### Energy

### *The community electricity right*

#### 38 The community electricity right

(1) The Secretary of State may make regulations which give individuals resident in a community or groups connected with a community (or both) the right to buy a stake in a renewable electricity generation facility that is located--

- (a) in the community (if it is a land-based facility), or
- (b) adjacent to the community (if it is an offshore facility).

(2) The Secretary of State may make regulations about--

- (a) the kind, or kinds, of body which may be a facility operator,
- (b) ownership of facility operators, and
- (c) matters relating to the ownership of facility operators (including the rights, duties and powers arising from ownership),

if the Secretary of State considers that the regulations are appropriate in connection with the right to buy.

(3) The Secretary of State may make regulations about the supply of information in connection with the following--

- (a) the right to buy;
- (b) ownership of stakes in qualifying facilities (including the transfer of ownership);
- (c) operation of qualifying facilities;

- (d) ownership of facility operators (including matters relating to the ownership of facility operators);
- (e) monitoring and assessing--
  - (i) the operation of the right to buy, and
  - (ii) the ownership of stakes in qualifying facilities.

(4) The Secretary of State may make regulations about the enforcement of obligations imposed by regulations made under any of subsections (1) to (3); and the regulations about enforcement may include--

- (a) provision for obligations to be enforceable as, or as if they were, generation licence conditions or relevant requirements;
- (b) a power to impose financial penalties for breach of obligations.

(5) The Secretary of State may by regulations modify--

- (a) any generation licence condition, or
- (b) any generation licence exemption,

if the Secretary of State considers that the modification is appropriate in connection with regulations made under any of subsections (1) to (4) or this subsection.

(6) Schedule 6 (which describes certain provision that community electricity right regulations can make, including provision about renewable electricity generation facilities, communities, and individuals and groups who may exercise the right to buy) has effect.

(7) In this section, Schedule 6 and section 39--

"community electricity right regulations" means regulations under this section;

"electricity generation licence" means a licence granted under section 6(1)(a) of the Electricity Act 1989;

"facility operator" means a person who generates, or is expected to generate, electricity at a qualifying facility for the purpose of giving a supply to any premises or enabling a supply to be so given;

"generation licence condition" means--

- (a) the conditions of a particular electricity generation licence, or
- (b) the standard conditions so far as they are incorporated in electricity generation licences by virtue of section 8A of the Electricity Act 1989;

"generation licence exemption" means an exemption from section 4(1)(a) of the Electricity Act 1989 granted under section 5(1) of that Act;

"land-based facility" means a renewable electricity generation facility that is not an offshore facility;

"offshore facility" means a renewable electricity generation facility that is located in waters in or adjacent to Great Britain that are beyond the mean low water mark;

"qualifying facility" means a renewable electricity generation facility in relation to which the right to buy is to be, is, or has been, exercisable;

"relevant requirement" has the same meaning as in section 25 of the Electricity Act 1989;

"renewable electricity generation facility" means a facility using a renewable source of energy to generate electricity (and here "renewable source" has the same meaning as in sections 32 to 32LB of the Electricity Act 1989--see section 32M of that Act) which is located in--

- (a) Great Britain,
- (b) waters in or adjacent to Great Britain which are between the mean low water mark and the seaward limits of the territorial sea adjacent to Great Britain, but do not form part of that territorial sea,
- (c) the territorial sea adjacent to Great Britain, or
- (d) the Renewable Energy Zone (within the meaning of Chapter 2 of Part 2 of the Energy Act 2004), except for any part of that Zone which forms part of the territorial sea adjacent to Northern Ireland;

"right to buy" means the right to buy a stake in a renewable electricity generation facility that is given by regulations under subsection (1).

### 39 Supplementary provision

(1) Community electricity right regulations may confer a function on--

- (a) the Secretary of State, or
- (b) any other person, apart from the Scottish Ministers or the Welsh Ministers.

(2) The functions that may be imposed include--

- (a) a duty (including a restriction or prohibition);
- (b) a function involving the exercise of a discretion;
- (c) a requirement to consult;
- (d) a requirement to take account of guidance.

(3) The provisions of section 38, Schedule 6 and this section which specify particular kinds of provision that may be made in community electricity right regulations do not limit the powers conferred by section 38 to make such regulations.

(4) The duties under Schedule 6 to make particular provision in community electricity right regulations do not apply unless the Secretary of State decides to exercise the power conferred by section 38 to make such regulations.

(5) Provision which commences community electricity right regulations may be framed so as to secure that the regulations do not apply to a renewable electricity generation facility if development of the facility has reached a stage of advancement specified in the commencement provision.

(6) A reference in section 38 or Schedule 6 to buying a stake in a renewable electricity generation facility includes a reference to making a loan in relation to a renewable electricity generation facility.

(7) The Secretary of State must carry out a review of section 38, Schedule 6 and the preceding provisions of this section as soon as reasonably practicable after the end of the period of 5 years beginning with the day on which they come into force.





20 December 2016

Gareth Blacker  
General Manager  
Infrastructure & Complex Projects  
Homes & Communities Agency  
Fry Building  
2 Marsham Street  
London SW1P 4DF

16 Titan Court  
Laporte Way, Luton  
Bedfordshire LU4 8EF  
Tel: 01582 725067  
Fax: 01582 482688

By Email

Dear Mr Blacker,

## **Essential Legal Issues Concerning Waste Derived Fuel**

My final plea to HCA concerns compliance by Dclg and Planning Inspectorate with SI 2010 No 675. I have in the past taken advice from Jeff Cooper of London Waste Regulatory Authority and Phil Ackerley of Environment Agency on the essential difference between a power station and a waste incinerator. Their advice is attached. A Chapter 1 process is authorised as a power generation process. A Chapter 5 process is authorised as a waste disposal process. Both legal experts are retired but their advice holds good the present day.

The essential difference may be summarised as follows:- If the focus of waste management is upon the supply of low carbon electricity and heat to a community using waste derived fuel then that process is authorised under Chapter 1. If the focus is upon the disposal of waste produced by that community by incineration then that process is authorised under Chapter 5.

Dclg under s.97 of NPPF and s.1 & s.4 of NPPW seeks a Chapter 1 process but appears not to understand the legal implications of its policy. Roger Wand of Dclg and Steve Quartermain/Martin Long of Planning Inspectorate wrote to my company not cognisant of the law of the land. My answer to all is that a renewable CHP scheme, fired by waste derived fuel, supplying a major new locally-led village, town or city with low carbon electricity and heat, under the law of England & Wales is not a waste management facility.

I am reminded of the frequent conflict between coal mining unions and CEGB. Coal miners believed coal was an essential commodity that they could dispose as they wished. CEGB, on the other hand, believed the supply of electricity and heat to communities was an essential service. Government sided with CEGB to call in the police and military to uphold.

The essential renewable CHP schemes which KTI Energy Limited currently develops include the following:-

1. Ebbsfleet Garden City : cooperation between Dartford and Gravesham Borough Councils;
2. Dunton Garden Village; cooperation between Basildon and Brentwood Borough Councils;
3. Gatwick Diamond: cooperation between Horsham District Council and Crawley Borough Council.

The Communities Secretary appoints waste Inspectors to determine the soundness of schemes which comply with Chapter 5. It is quite clear from s.75 of Environment Protection Act 1990 that if waste derived fuel is essential to mitigate climate change then that waste derived fuel cannot be held to be unwanted. Waste planning authorities and Inspectors determining whether the aforementioned community-led renewable CHP schemes should proceed or not places them on a par with Arthur Scargill and his union.

My previously voiced complaint about four ducks short of a pond relate to honourable waste contractors who produce waste derived fuel for power generation under Chapter 1 finding waste planning authorities and Inspectors instead examining the process under Chapter 5. If, as you read from the attached, Slough Heat & Power was not authorised by Environment Agency under Chapter 5 (waste disposal) then nor should be any of the aforementioned CHP schemes under development by KTI Energy Limited.

What you and colleagues need to recognise is that under Brexit the export of 3.2 million t/a waste derived fuel to mainland Europe users may no longer be viable. The development of an equivalent home market becomes imperative not to be clouded by waste Inspectors appointed by the Communities Secretary examining the soundness of CHP schemes under development by KTI Energy Limited but unfortunately unfamiliar with the legal status of modern renewable CHP technology.

I respectfully request you to continue determining optimum financing of community-led renewable CHP schemes as power generation and not waste disposal processes.

Yours sincerely



Dr Bill Temple-Pediani  
Managing Director  
KTI Energy Limited



Our ref: TH148

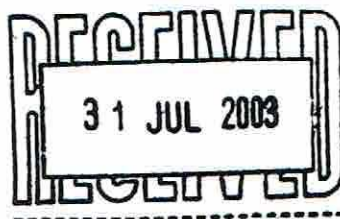
Your ref:

Date: July 29, 2003



ENVIRONMENT  
AGENCY

Dr Bill Temple-Pediani  
Managing Director  
KTI Energy Ltd  
16 Titan Court  
Laporte Way  
Luton  
Bedfordshire  
LU4 8EF



Dear Dr Temple-Pediani

### **ESSENTIAL DISTINCTION BETWEEN A POWER STATION AND A WASTE INCINERATOR**

There are distinctions between the definition of biomass that I provided in the letter of 16th June and that which appears under Renewables Obligation.

The definition provided was taken from the Waste Incineration Directive but also appears in the Large Combustion Plant Directive, LCPD (2001/80/EC). These Directives, along with the PPC Regulations, define the requirements of a permit for a combustion plant. Both the Directives (including definition of biomass) have been transposed into national legislation and will be used in issuing a permit. Whether a given biomass is eligible under ROCs does not affect the requirements of a PPC permit.

PPC permit for a power station has to have conditions imposed either under the WID (if burning waste) or LCPD (if burning biomass and/or fossil fuels). The activity description under various chapters does not come from Directive but comes from national legislation. A stand alone power plant will be permitted under Chapter 1 irrespective of whether it has to comply with WID or LCPD. For example, Slough Heat and Power operates a number of combustion plants that burn fossil fuels and/or waste derived fuels. All these plants are authorised under Chapter 1 and are not called incinerators but the requirements of the WID will apply to the units that burn waste. Similarly, we authorise the burning of waste in cement plants and authorise them under chapter 3 even though they will be subject to the requirements of the WID.

We would be in a much better position to advise you if you ask specific questions on environmental protection legislation and requirements related to plants that you are proposing.

Yours sincerely

PHIL ACKERLEY  
Strategy Manager



### **Annex 3**



**ADVANCED VIRGIN AND WASTE BIOMASS MANAGEMENT  
COMPATIBLE WITH MULTI-FUEL RENEWABLE COMBINED HEAT  
AND POWER SCHEMES SERVING LOCALLY-LED VILLAGES, TOWNS  
AND CITIES WITH LOW CARBON ELECTRICITY AND HEAT**

**TARGET AUDIENCE**

**Department for Communities & Local Government (Dclg)  
Homes & Communities Agency (HCA)  
Selected Waste Authorities & Contractors**

**Preamble**

"Locally-led Villages, Towns and Cities" was published by Dclg in March 2016 to encourage Local Authorities to enter into their Local Plans the development of new communities with at least 10,000 new dwellings attached. Known contenders are North Kent (Ebbsfleet), South Essex, Gatwick Diamond, Bicester and North Northamptonshire. Frequently, such property development straddles the boundary of two Local Authorities. Frequently, such property development is on land largely devoid of robust utilities to adequately support new dwellings and essential employment, educational, medical and retail premises.

KTI Energy Limited is deploying its expertise in power generation to co-develop multi-fuel renewable CHP schemes to serve each Locally-led Village, Town and City with low carbon electricity and heat. One criterion insisted upon is that not less than 10,000 new properties are to be connected to an extensive district heating network installed as original equipment. The second criterion is that residents and businesses within the energy catchment are to be offered shareholding in the overall renewable CHP scheme.

Dclg in October 2014 published National Planning Policy for Waste which in s.1 and s.4 advocates that planning authorities recognise the contribution which waste can make to the development of sustainable communities; particularly by the supply of low carbon heat. Three reasons why this will not happen under the present regime, as follows:-

- a) Inspectors examining Waste Local Plans express universal doubt as to whether such renewable CHP plant and its district heating network serving a major new community are in fact waste management facilities (KTI Energy Limited finds they are not);
- b) The waste industry, under the tutelage of Defra and Wrap, has become accustomed to dispose waste by mass burn incineration, certainly a waste management process, but without heed to optimum location to comply with climate change terms set out under s.1 and s.4 of NPPW; and
- c) The waste industry, under the tutelage of Defra and Wrap, has become accustomed to export virgin and waste biomass fuel feedstock, produced to random size, composition and moisture specification, to mainland European users at a cost less than disposing exactly the same fuel feedstock to British incinerators.





### **Specification of British Renewable CHP Plant**

A renewable CHP serving a major new community must perform with the durability and reliability of a utility power plant. Its output of electricity and heat must predictably match the demand of the community it serves. As a general rule, every utility power plant fired by coal, oil or gas receives its fuel to an agreed specification of calorific value, size and blend. There is no record of the British waste industry following the same practice by building a renewable CHP plant and its district heating network to then produce and deliver virgin and waste biomass fuel to an agreed specification.

Intending to counter this unpromising background, KTI Energy Limited has proposed to Dclg and HCA the development of dedicated renewable CHP schemes serving new communities of not less than 10,000 new properties planned by Local Authorities in Ebbsfleet Garden City, Basildon/Brentwood and Horsham/Crawley. There are no impediments to progress except those which might be erected by the Waste Planning Authorities of Kent County Council, Essex County Council and West Sussex County Council whose Waste Local Plans do not enter compliance with s.1 and s.4 of NPPW because they too agree renewable CHP schemes are not waste management facilities.

The specification of renewable CHP plant is already well publicised by KTI Energy Limited. Each will install twin boilers and steam turbine generating 60MWe net in pure electricity mode. As back-up, each will install a 39MWe CCGT to maintain consistent energy output over 8,760 hours per annum when one boiler is down for planned maintenance. Each CHP plant will own its district heating network. Present consideration is that each should also own its dedicated virgin and waste biomass fuel refining plant producing 600,000 tonne per annum to an agreed specification.

RDF size specification is 99% < 150mm; 95% < 100mm; 99% > 19mm. Woodchip size specification averages 75mm. Rubber chip specification averages 50mm. There is no merit in waste authorities producing costly SRF instead of cheaper RDF because the increase of calorific value causes a decrease in annual revenue to the CHP plant.

### **Specification of British Virgin and Waste Biomass Fuel Refining Plant**

For consistent energy output it is helpful that the twin boilers receive fuel with consistent calorific value. Interposed between a plurality of contractors operating mechanised Material Recovery Facilities (MRFs) and a plurality of contractors, builders and public engaged in the hand sorting of combustible solid waste, and the CHP plant is a dedicated Fuel Refining Plant (FRP) to be owned by the renewable CHP plant.

The FRP need incorporate of no more than shredders, screens (trommel or disc) and blender operating at a rate of around 100 tonne per hour. Output of 600,000 t/a will likely require input of around 625,000 t/a from the plurality of feedstock suppliers quoted above. Input in 23-25 tonne loads will be matched by delivery of fuel to specification by the same trucks also in 23-25 tonne loads. The location of FRP should enable 6 trucks per hour to enter and leave without causing congestion to the local road system.





Co-development of renewable CHP scheme and FRP should enable the out-moded technology of mass burn incineration to be rejected from Waste Local Plans. All solid waste is efficiently treatable by this technique with possible blending of selected agricultural and forestry residues while still retaining a consistent fuel calorific value of 12.5 MJ/kg delivered to the CHP plant.

### **Budget Economics of Three-Stage Treatment of Solid Waste**

KTI Energy Limited is consulting with interested Government and private parties on the basis that the gate fee for 600,000 t/a fuel blend delivered to a renewable CHP plant should average £45 per tonne. The average amount is founded upon RDF, woodchip and tyrechip qualifying for different gate fees paid to the CHP plant. But, in total, the WRP will pay annual revenue to the CHP plant in an amount of £27.0 million.

The gate fee which MRFs, civic amenity sites, builders, industry and commerce will pay the WRP to process their waste feedstock to fuel to specification is negotiable. But it appears reasonable for the WRP to charge an amount similar to brokers who export the same feedstock to mainland Europe. Around £70 to £80 per tonne for feedstock to be converted to 345,000 t/a RDF to an agreed specification; less for material to be converted to woodchip to specification; even less for tyres to be converted to rubber chip; possible close to zero gate fee for blending in straw and poultry litter.

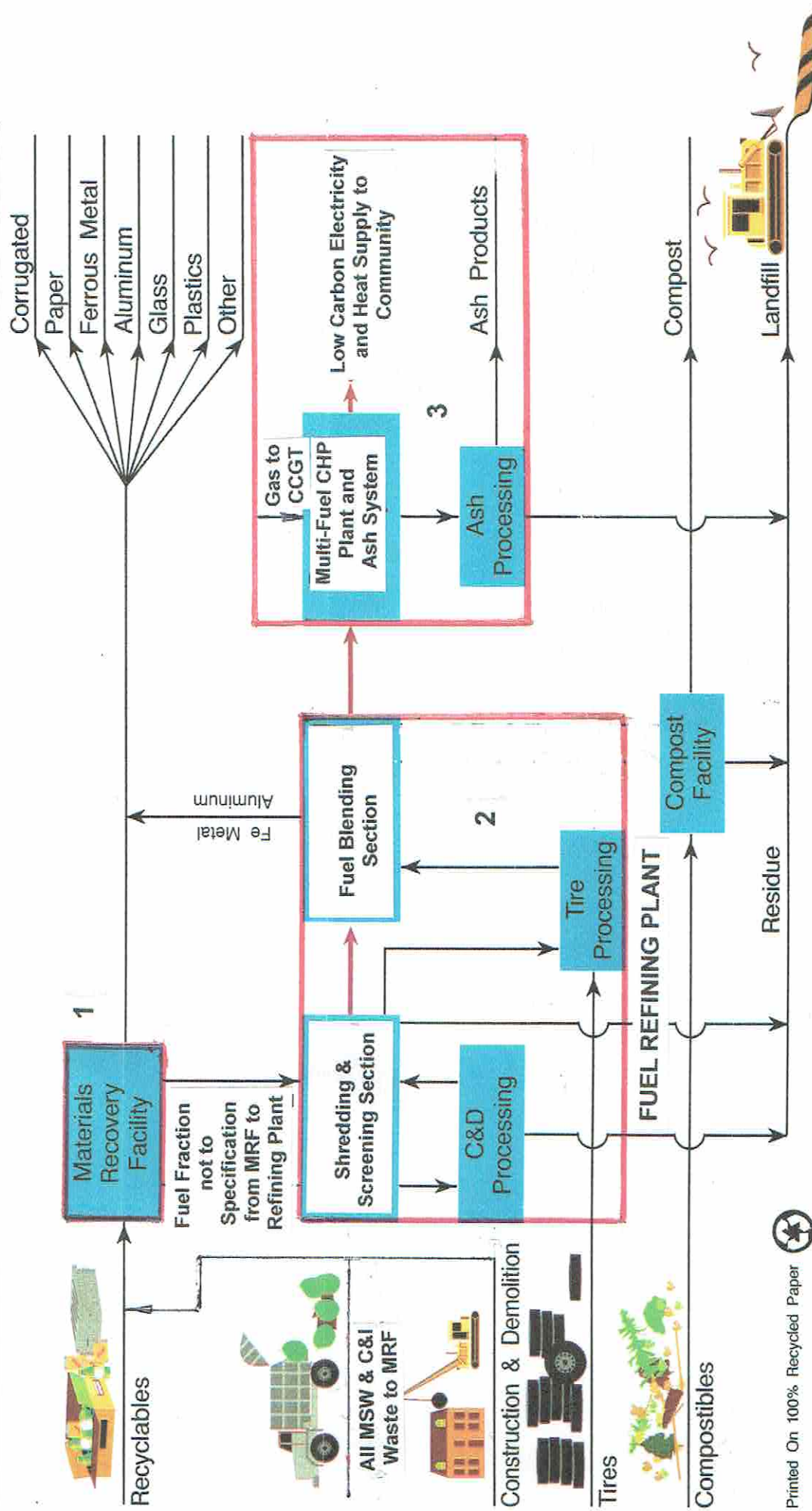
Working from front to rear, the question which KTI Energy Limited is not disposed to answer is the gate fee which Waste Disposal Authorities and other waste producers should pay a plurality of contractors operating MRFs with or without shredders/screens. Taking Viridor and Veolia MRFs as typical, possibly £100 per tonne for crude waste received by each MRF is not unreasonable on the basis that neither contractor in future will have to export their fuel fraction to mainland Europe.

KTI Energy Limited is advised by Dclg and Environment Agency that 3.4 million t/a fuel fraction not to specification is currently exported to users in mainland Europe. When the UK is at risk of blackouts in winter due to a shortfall of generation capacity, the prospect of 50MWe electricity and 60MWe heat supplied to six selected Locally-led Villages, Towns and Cities is the challenge which the British waste industry is neglecting. KTI Energy Limited has identified three deserving communities and is developing renewable CHP schemes serving them with low carbon electricity and heat.

A consideration which KTI Energy Limited is asking Dclg and HCA to evaluate is the financial saving which Waste Disposal Authorities could make by closing down waste incinerators, some approaching the end of their contracts, in favour of the three-stage treatment of solid waste for the explicit purpose of reinforcing Britain's energy infrastructure and mitigating community climate change.

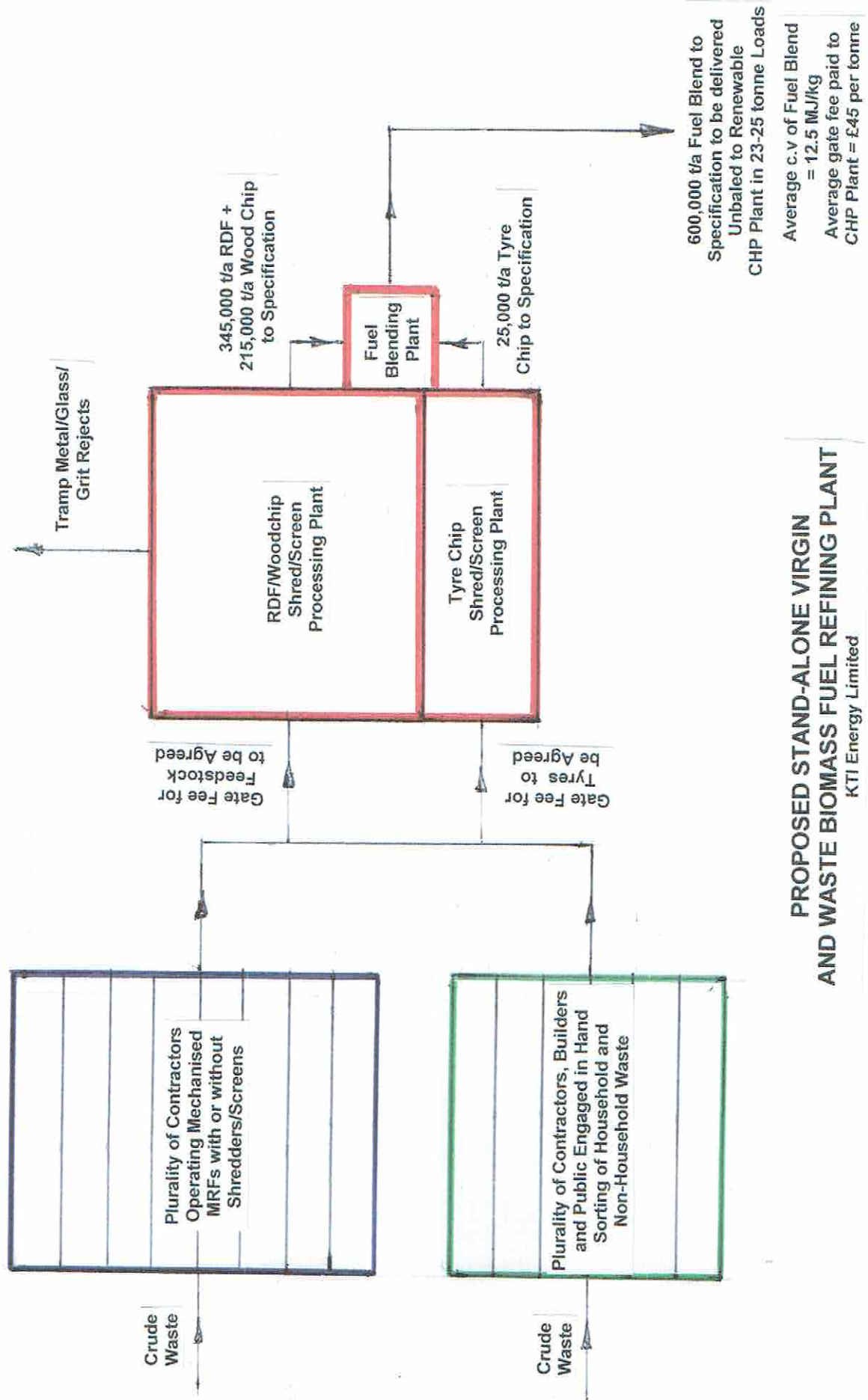
## Waste Streams

## End Products



**THREE-STAGE TREATMENT OF SOLID WASTE**  
showing interface between Waste Industry and Power Industry  
KTI Energy Limited





## PROPOSED STAND-ALONE VIRGIN AND WASTE BIOMASS FUEL REFINING PLANT

KTI Energy Limited



## Annex 4

# #6 Integrated utilities and services

Delivering sufficient utilities capacity will be a significant challenge for Ebbsfleet, but also provides a major opportunity to unlock development potential and accelerate the pace of development.

EDC is acting as a mediator between utility companies to bring forward a more integrated approach to provision, that ensures that development sites are unlocked and unconstrained by utilities infrastructure through intelligent timing and phasing.

EDC will also continue to investigate new technologies, including renewable technologies and decentralised approaches to utility provision to further advance the pace and quality of development.

## Integrated utilities

- The Framework establishes a coordinated, area-wide approach to utility provision, ensuring utilities are provided from the outset and making maintenance easier and less inconvenient for residents. A network of utility corridors is integrated into the Framework, extending to all corners of Ebbsfleet and running primarily beneath the dedicated Fasttrack route. Cabling will be laid in conduits for easy access. As such, any work or upgrade of the network will cause minimum disruption to the movement network.
- This integrated network includes new duct networks to deliver the high speed broadband fibre optic cable distribution, and will converge at a utilities hub, to monitor service provision and help optimise efficiency in the networks.

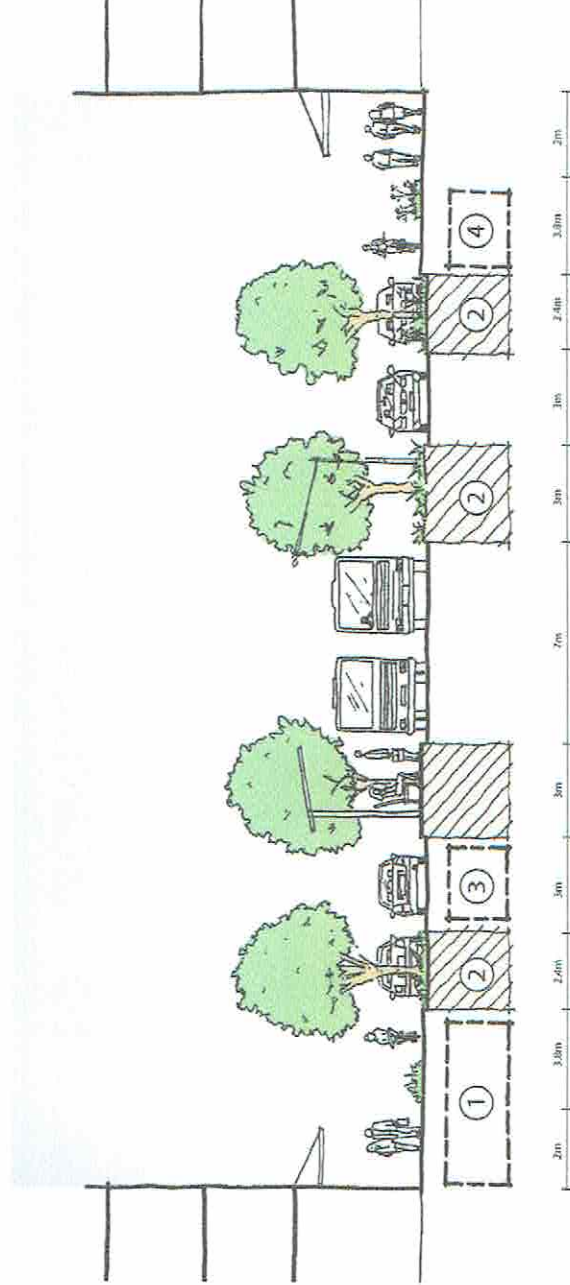
## Water management

- Ebbsfleet will continue to be designed using the principles of Water Sensitive Urban Design – the process of integrating water cycle management with the built environment through planning and urban design. Rather than being channelled into the constrained sewer network, rain water falling on Ebbsfleet will be slowed using appropriate approaches and devices to help clean the water before it is discharged into waterways or potentially stored for reuse.
- Waste water should not be wasted. Opportunities for new localised and scalable waste water treatment will reduce the pressure on the existing and traditional waste water treatment plants by treating waste water ready for reuse through flushing toilets or for irrigation.

Extract by KTI Energy Limited from “Ebbsfleet Implementation Framework – October 2016”

## Superimposition of CHP plant and district heating main in compliance with Policy CS23 of Dartford Local Plan

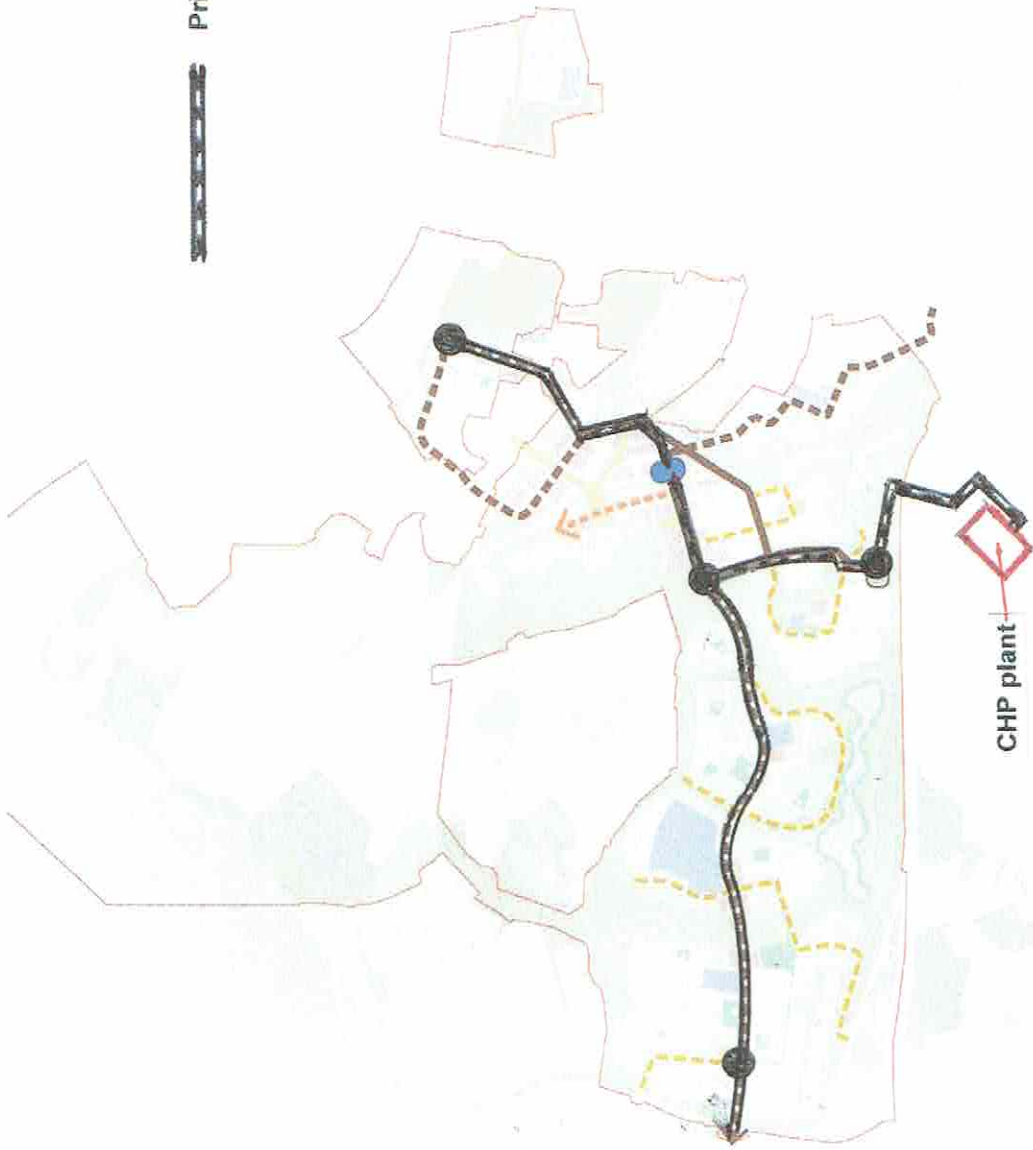
**Primary Utilities Corridor**  
Typical arrangement of utilities and services under the street so that disruption is minimised and potential for SuDS maximised.



- 1 Primary utility service corridor zone under footway / cycleway (2m buffer from building boundary required);
- 2 Bio-retention / swales and deep planting zones to accommodate large trees.
- 3 Low maintenance, gravity-fed primary utilities (e.g foul main) could be accommodated here if insufficient space under footway.
- 4 Duct for district heating pipes

**Sustainable utilities**  
Provision of an integrated utilities network that facilitates a 21st century smart Garden City.

**Primary district heating main**



- Key**
- Key utilities corridor
  - Key utilities corridor alignment for further investigation
  - Potential secondary utilities corridor
  - Potential Paramount access route with integrated utilities
  - Utilities hub

# Bringing it all together

The Implementation Framework brings together the six key moves to provide a comprehensive and integrated structure for the planning and design of Ebbfleet.

EDC will use the Implementation Framework as a basis for working with developers and partners to adopt an integrated approach to development across the area, with a focus on maximising the development potential, delivering at pace and advocating for outstanding quality for both the natural and built environments.

The Framework requires a multi-layered approach to implement the six key moves and deliver against the Framework's delivery themes and associated objectives.

- Celebrating and reflecting Ebbfleet's landscape, people and cultural heritage
- Bringing in the green and the blue - an integrated green infrastructure network;
- Building on connections - connected movement networks and street hierarchy;
- Focus on centres and community facilities - hub locations for jobs, social infrastructure and leisure provision;
- Quality Homes and Neighbourhoods - densities and layouts responsive to the landscape, movement and accessibility to centres;
- Integrated utilities - a more joined up and sustainable approach to utility provision.

Target anchor heat load:  
60,000kWth to 75,000kWth

Framework Ambitions  
These figures set out the key ambitions and targets that underpin the Implementation Framework





### The Implementation Framework

Key diagram illustrating built form, movement, land use and green infrastructure, as well as areas of flexibility.

#### Key

- |   |   |
|---|---|
| EDC Urban Regeneration Area Boundary                                  | Open space  |
| Residential   | Public realm/squares/promenade                      |
| Potential floating houses   | Local Open Space                                    |
| Commercial mixed use  | Topographical feature                               |
| Mixed use retail, education and community                             | SSSI  |
| Education   | Waterway/Lake                                       |
| Community   | Strategic open space with water management function |
| Local centre  | Wetlands  |
| Employment  | Marsh   |
| Mixed use (with residential)  | Natural Landscape                                   |
| Land subject to London Paramour MSP process                           | Key pedestrian and cycle way (on site)              |
| London Paramour Resort road route alignment for further investigation | Key pedestrian and cycle way (off site)             |
|   | Tunnels   |
|   | Cliff   |
- |   |   |
|---|---|
| London Paramour Resort underground road alignment for further investigation | Road network                                  |
| Existing residential  | Vertical connection                           |
| Existing employment   | Pedestrian / cycle connection                 |
| Existing major retail   | Green street/tourist                          |
| Green belt  | Railway corridor                              |
|   | Railway stations                              |
|   | Fast-track corridor                           |
|   | Fast-track corridor for further investigation |



**From:** Lesley Sage [REDACTED]  
**Sent:** 05 March 2017 12:32  
**To:** futuremedway  
**Subject:** LOCAL PLAN 2035

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi

I object to further building on the Hoo Peninsula. It is one of the last rural areas in Medway, and the proposal to build an additional 30,000 homes will totally transform the region, and not for the better.

I have the following comments in connection with your planning proposal:

1. There has already been significant building in recent years and the level of anti-social behaviour has increased noticeably. There is more rubbish being dumped, more bullying of children, more vandalism, more drunken and loutish behaviour, I myself I have noticed all of this, and not bothered to report it to the police because it's all relatively trivial, but it is increasing. At the moment the peninsula is still a safe place for children and single women to walk alone at night.

2. Before farmland and green areas are turned into housing and industrial estates, you need to consider all the following:

Building on waste land and derelict land in the towns  
Converting empty warehouses and factories to housing.  
Converting unused retail premises and offices to housing.

There are many of these sites on both sides of the Medway Tunnel and within the towns. Mountbatten House is a prime example of a building that has been empty for years, and should have been converted to apartments a long time ago. Bourne Court is an example of what can be done. Even if these actions cannot provide the 30,000 homes you say you need, it would reduce building on the peninsula. Any reduction is essential to preserve the rural aspect of the area.

3. Not only do I have concerns about the devastation to the character of the area, there are practical matters too:

The schools are full  
The doctors are full  
The bus service is poor:

Buses are often late and the journey time to the towns is significant, often taking an hour (or longer) to reach Chatham from Hoo (return journeys in the evening rush hour are even longer).

Villages further out from Hoo have a limited bus service and the travel times can be lengthy.

Morning buses are often full before they leave Hoo and passengers have to stand for the whole journey (remember this could be an hour) or are left behind because there is no space.

With a massively increased population, travel times to and from the towns will be significantly longer, and they are already onerous.

4. The Medway Tunnel and the connecting road to London have made the peninsula an expensive place to live. House prices have increased disproportionately compared to the rest of the towns, and my children who were both born in Hoo cannot now afford to live here. House prices and rents are well beyond their means. This is something I also hear from many friends and neighbours.

Building more houses that are too expensive for locals is an insult to us. Prices are now such that only Londoners can afford them. Rents are also so high that only Londoners can afford them. Where ever you build these houses they must be affordable for locals and with long term tenancies. This is essential if locals are going to be able to live in the communities where they were born and educated and hope to raise their own families.

I do not want private landlords with high rents and sub-standard housing on the peninsula. There is a risk, I believe that the peninsula could turn into something similar to Luton. A few years ago there were serious problems with Chattenden and families moved there from London. It was not a safe place at night, with cars set on fire, burglaries and high crime. I do not want that again.

5. The plans also include substantial areas for industrial development. It was said that employers are desperate to locate businesses, warehouses and factories on the peninsula. But, if that were the case, surely all the premises on the Medway City Estate would be in use, and they are not. And again, these must be jobs for locals, and there must be improved public transport for locals to these sites. My belief is that work will be for drivers only and workers will not be mainly chosen from local areas.

Finally, I object very strongly to any development on the peninsula. There has already been excessive building but these plans will desecrate the area totally. The peninsula will no longer be rural and these plans will lead to Medway becoming one continuous urban area from Rainham to Grain.

If I had to choose one of your terrible plans, I would choose the one that shares the burden between all the villages, so that all expand a little to hopefully preserve some of the peninsula's unique character.

Regards

Lesley Sage (Mrs)

[REDACTED]

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**From:** Lesley Sage [REDACTED]  
**Sent:** 06 March 2017 06:12  
**To:** futuremedway  
**Subject:** Local Plan 2305

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi

Instead of building housing that locals cannot even dream of affording, you need to build council housing. I don't mean houses built by that tyrannical, behemoth MHS. I mean low rent, good quality, council housing with long-term rents.

Both my son and my daughter are expecting children this year, both were born and have lived all their lives on the peninsula, and neither have the funds for a deposit to buy a house. Both are looking for a home to rent on the peninsula and it is impossible because rents here are beyond their pockets.

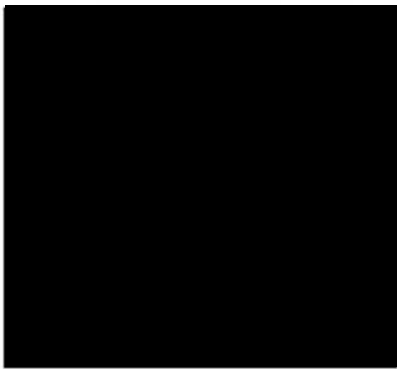
My fear is that the limited social housing that will be built will be given to people without a local connection. There will be an influx from London and Swale placed here by their councils because Medway is cheaper, and they will be people who have no interest in the area, who want to return 'home' as soon as possible. These councils also tend to move their problem families, as London & Quadrant did in Chattenden, a few years ago.

I don't believe that Medway needs 30,000 homes. I believe there would be enough homes for Medway residents if other councils housed their people in their own areas, and did not take housing from locals. Maybe you should be investing time and money encouraging private landlords to rent to locals.

Regards

Lesley Sage





9 MAR 2017

09 MAR 2017



Medway Council.

6<sup>th</sup> March 2017

RE; Structure Plan.

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

### **Strategic Issues**

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

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

### **Scenario 3: A Rural Focus.**

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

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

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

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

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

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

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

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

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

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

Signed

A large black rectangular box redacting the signature.

Lesley Williams.

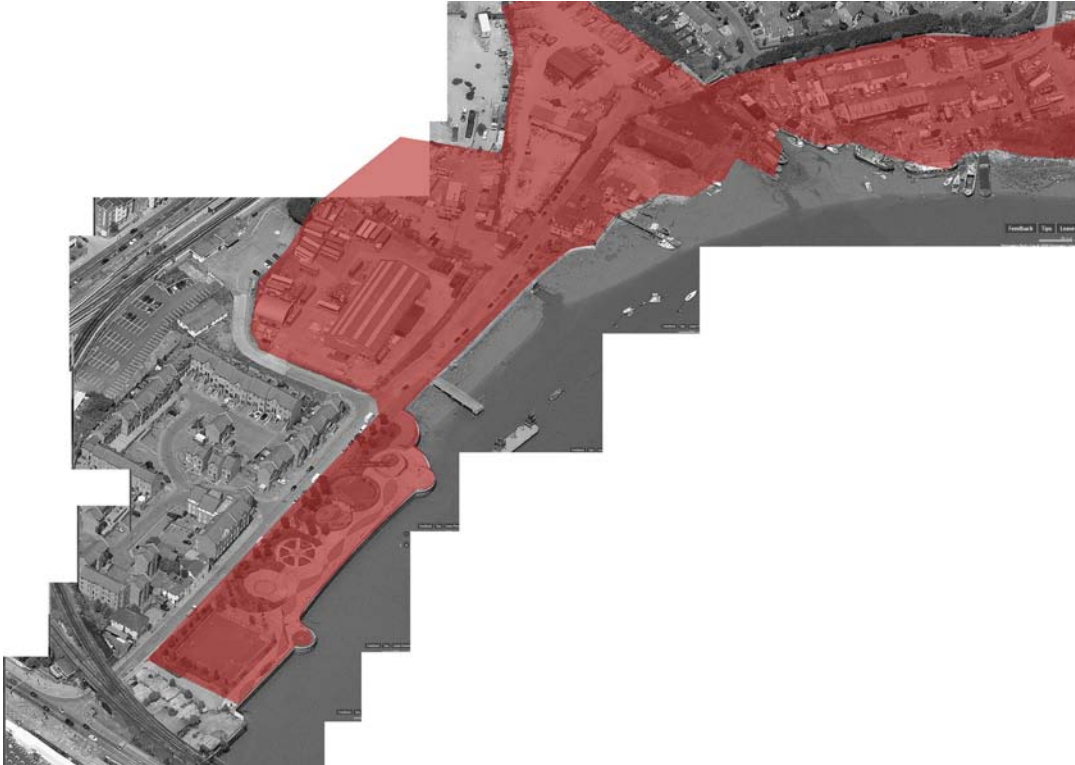


## **Response to Medway Local Plan 2012 - 2035**

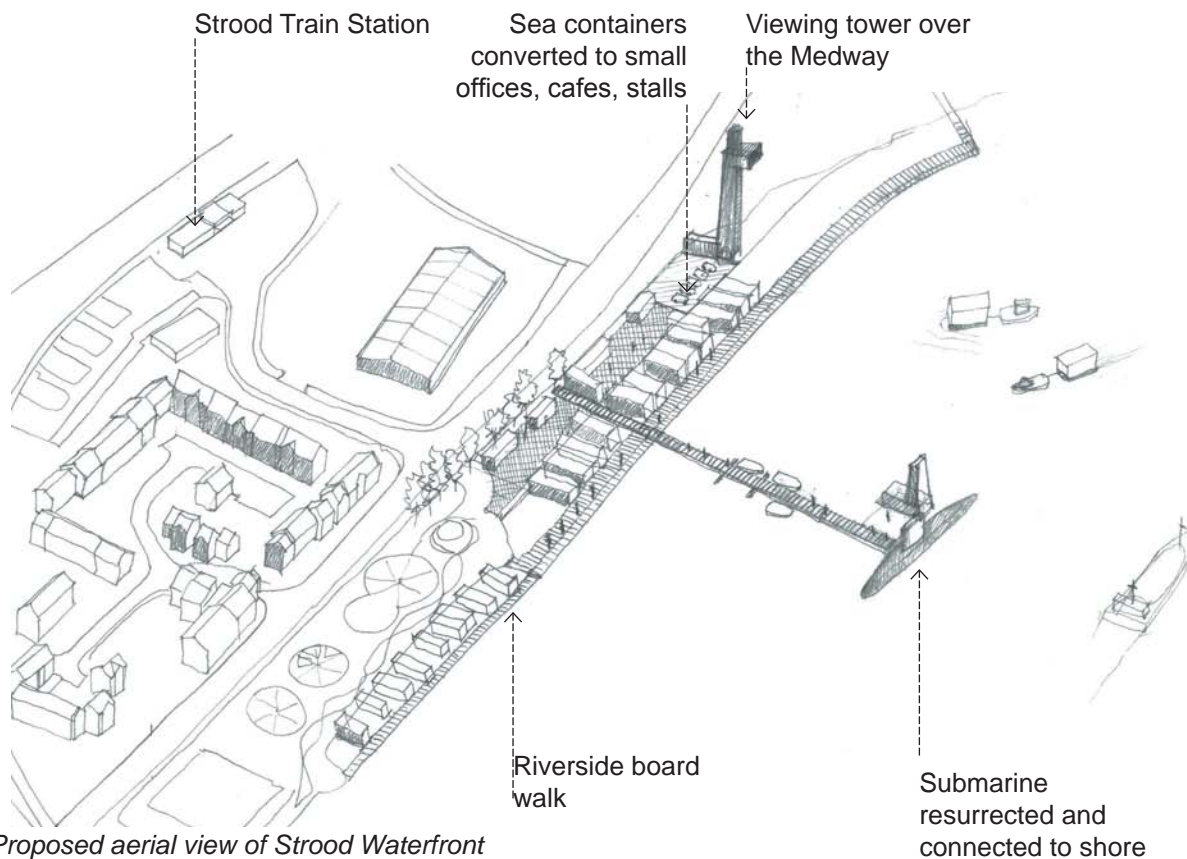
Lewis Bailie  
April 2017

## Strood Riverside

Strood is 33 minutes from London's St Pancras Station. It is a beautiful setting overlooking the River Medway with historic views to Rochester Cathedral and Castle. However much of the section along Canal Road, beside the River Medway lies under utilized and derelict. There seem to be no future proposals for this area mentioned in this version of the development proposals. I think this could be greatly improved and the following sketches and images show some possible ways this could happen.

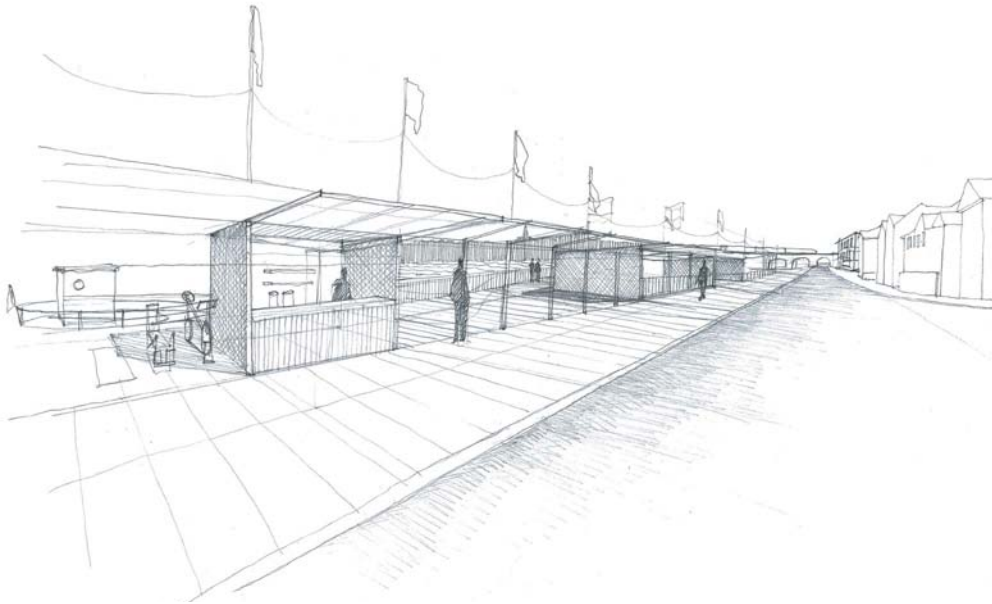


*Strood waterfront - recent aerial view*

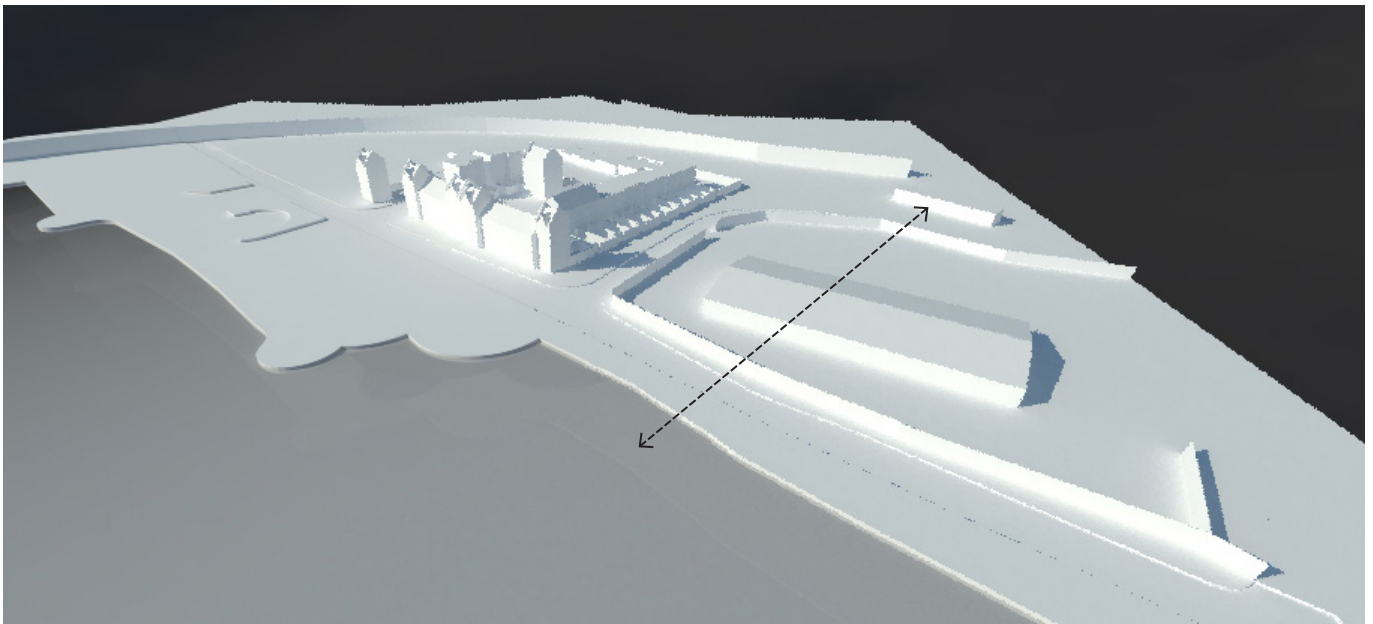


*Proposed aerial view of Strood Waterfront*

*Proposed Market stalls on Canal Road  
These could create a feeling of a seaside promenade, with a carnival atmosphere.*



*Current view from Canal Road to towards Rochester ..and proposed*



*3D model showing existing buildings around Strood Station  
The station could have a much stronger connection to the riverside*



## Existing Precidents

The images below show a number of proposals for riverside regeneration from around the world.



*Above:  
Proposed riverside, Norwich  
(from Generation Park Norwich)*

*To left:  
Riverside boardwalk, Toronto by  
Room 11 Architects  
(From Dezeen)*

*Below:  
Changi boardwalk, Singapore*





## Appendix 1C - Suburban expansion

The diagram shows an expansion of mixed use development to the North-West of Strood. This is an area of green fields and countryside - why is this being developed when there are areas within the city that are vacant and underutilized. Why not instead seek to develop and enhance the inner areas of Strood, many of which lie vacant and underutilized instead of spreading the town out into the existing beautiful countryside which will be irreversibly altered. I think it is important that this outward expansion is kept at least within the confines of the A289 around Wainscott. Also, the diagram is not clear exactly where the development will be located - there seems to be some overlap with the roads around this area.

