GL Hearn

Medway Core Strategy – Examination in Public (Ref: 76)

Introduction

1. This further Written Statement has been prepared by GL Hearn on behalf of the Trustees of Hempstead Valley Shopping Centre (herein referred to as the Trustees) in order to provide further clarification with regard to the representations made to the Medway Core Strategy on the basis that it was unsound.
2. As a key investor in the Borough the Trustees have engaged with the process of the development of Medway's Core Strategy and representations have been made to the various stages as the plan policies have evolved. In accordance with guidance pertaining to submission of further written evidence it is not our intention to reiterate the representations made (although these remain valid) within this statement, however the representations made to the Publication Draft Core Strategy are attached as Appendix 1 for ease of reference.
3. The key purpose of this statement is to provide the Inspector with further background to the development of Hempstead Valley Shopping Centre, explain its role within the community and the commitment of the Trustees to maintaining and sustaining its vitality and viability.
4. We have considered the representations made in light of the National Planning Policy Framework (NPPF) which describes a plan that is sound as being that:
    - Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
    - Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
    - Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
    - Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
5. Our analysis pertaining to Policy CS19 and Policy CS30 is set out below. Whilst our objection to the lack of reference to the lack of inclusion of HVSC as a District centre in Figure 10.7 remains we have no further points to add to our original representations in respect of this matter.

Policy CS19 / Paragraph 6.50

6. On behalf of the Trustees we uphold our objection to this policy on the basis that it is unsound. In the context of paragraph 182 of the NPPF it is considered that the policy is unsound on the basis that it is not positively prepared and is inconsistent with National Policy.
7. The NPPF puts the presumption in favour of Sustainable Development at the heart of planning and sets out 3 dimensions of this objective (paragraph 7):
    - An Economic Role
    - A Social Role

- An Environmental Role

8. National policy pertaining to town centres seeks to ensure vitality and viability of centres. The key thrust of the NPPF as set out at paragraph 23 of the guidance is that planning policies should be positive and promote competitive town centre environments.
9. In drawing up Local Plans, local planning authorities, most notably with regard to this objection, should:
   - Recognise town centres as the heart of their communities and pursue policies to support their vitality and viability;
   - Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
   - Retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
   - Where town centres are in decline, local planning authorities should plan positively for their future and encourage economic activity.
10. HVSC is located approximately 6km south-east of Chatham and is situated north of the M2 and west of the A276.
11. The development of Hempstead Valley began in 1974 and was planned as a major district centre, of originally approximately 250,000 square foot in size. Hempstead Valley opened on in 1978 with UK's first Food Court.
12. HVSC is a well managed District Centre providing employment for in the order of 1600 staff. It comprises anchor units such as Sainsbury's and Marks and Spencer's, high street retailers including Argos, Boots, WH Smith and a BHS variety store, together with financial services, travel agents, restaurants, a public house and community facilities. It is a very popular centre with local residents. The centre currently has 52 separate units and a gross floorspace of approximately 41,364 m^2. The centre is therefore an important retail centre, service provider, local employer and community resource for Medway.
13. The Trustees have owned the Centre since its construction and are long term investors having refurbished and improved the Centre since opening. However, much of the centre still reflects its 1970s origins. Today 30 years on, many of the original units no longer meet current retailer requirements for larger floor areas. Retailers now require units with larger footprints, larger structural grids (i.e. less columns) and increased floor to ceiling heights. Customer expectations have also increased in respect of levels of service, quality of finishes and provided space standards.
14. As long standing and committed owners, the Trustees are looking to the future and have assessed a range of investment options for the centre in order to maintain its role, enhance its mix of uses and to improve public realm and transport facilities.
15. An extant outline planning permission exists (MC/10/2971) for the redevelopment of the southern mall of the centre to improve customer choice and facilities. This comprises some 4,681 sqm of net additional retail floorspace. The Trustees have been progressing pre-application discussions with the Local Planning Authority to deliver a detailed scheme which will deliver Class A1, A2, A3 and D1 floorspace in accordance with the approved level of retail floorspace of MC/10/2971 and diversify the offer of the centre in terms of its A3 restaurant and café offer. It is proposed that this will be delivered alongside a high quality public realm and improvements to the public transport facilities at the centre.
16. It is considered that the continued improvement and development of HVSC accords with the planning policy guidance as set out in the NPPF both in terms of the delivery of sustainable development objectives but also the need to recognise centres such as Hempstead Valley as being at the heart of

communities and the requirement to enable to be competitive; diversify and maintain their vitality and viability.

17. The retail strategy as set out in the emerging Core Strategy (Policy CS19) hinges on delivering major new retail development in Chatham and focuses the delivery of retail floorspace in the latter half of the plan period. This is considered in detail in the representations attached as Appendix 1. It is our view that if a more flexible approach is not applied in the early part of the plan period Medway will be faced with leaking expenditure and growing pressure from retail proposals in less sequentially preferable sites.
18. We do not consider that this strategy is in accordance with the NPPF. It will not help to ensure, as required by paragraph 23, that HVSC remains attractive or competitive as the restrictions upon the sustainable comparison and convenience growth of the centre alongside other appropriate district centre uses would restrict the centre from meeting the demands of the community through providing choice and a diverse offer.
19. For the reasons as set out above and contained within the representations we request that the reference made to Hempstead Valley Shopping Centre is redrafted to reflect a more flexible approach inserting a new bullet point to state:

> *"Hempstead Valley is a district centre and new retail investment will be encouraged to enhance its competitive position ensuring new development is of a scale that would not divert investment from Chatham in particular, and other district centres."*

Policy CS30

20. We note that our observation that Rainham was not correctly identified as a District centre has now been corrected.
21. Our representation to this policy as set out at Appendix 1 states that we do not consider Policy CS30 to be sound in its approach to the further development of HVSC. As previously stated the NPPF encourages the "promotion of competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres". In the Portas Review – An independent review into the future of our high streets (December 2011) the importance of diversification and multifunction of centres is acknowledge and referenced in the quote from Action for Market Towns (2011) which sets out that *"town centres that are fit for the 21st century need to be multifunctional"* and that they should be *"rooted in the interests and needs of local people, and will meet the demands of a rapidly changing world."*
22. As previously described HVSC is over 30 years old and in order to enable it to deliver customer choice and maintain its vitality and viability it must be able to respond to the retail market and deliver the services required within a competitive district centre or it will lose trade to competing out of centre developments.
23. If the centre is to continue to meet the needs of its local community its development needs to enhanced rather than *"maintained"* as described in emerging Policy CS30 to ensure that retail spend is not leaked outside of the borough. This is in keeping with the NPPF's position on promoting competitive centres.
24. HVSC has seen a rise in its vacancy rate over the last few years with most notably Units 63 and 64 being untenanted following a period of short leases. The Trustees are committed to reinvesting in the centre to ensure this trend does not continue however this requires the clear support from the Council over the plan period or the centre could face decline as it will be unable to compete with surrounding centres.

25. We therefore respectfully request that Policy CS30 is amended as follows:

"Hempstead Valley is a district centre and new retail investment will be encouraged to enhance its competitive position, ensuring new development is of a scale that would not divert investment from Chatham in particular and other District Centres."

Appendix 1

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the DPD does this representation relate?

Paragraph	6.50	Policy	CS19	Proposals Map, Figure or Table.	

4. Do you consider the DPD is:

	Yes	No
4.(1) Legally compliant		
4.(2) Sound *		✓

* The considerations in relation to the DPD being 'Sound' are explained in Planning Policy Statement 12 in paragraphs 4.36 – 4.47, 4.51 and 5.52 and the boxed text. (See associated 'Guidance Notes for Submitting Representations').

If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified	
(2) Effective	✓
(3) Consistent with national policy	✓

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.
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Medway Publication Draft Core Strategy Consultation

We write on behalf our clients the Trustees of Hempstead Valley Shopping Centre Trust who are the owners of the Hempstead Valley Shopping Centre. We make these representations on the Medway Draft Core Strategy (August 2011), having made previous representations on earlier versions of the emerging Core Strategy.

As you may be aware The Trustees have owned and invested in Hempstead Valley for over 30 years. Hempstead Valley is a popular and well managed District Centre which is highly regarded by the local population it serves.

In January 2011 the Trustees obtained outline consent (MC/10/2971) for the redevelopment of the southern mall to improve consumer choice and facilities. It is the intention of the Trustees to shortly present to the Council its detailed proposal for the southern mall. This illustrates the owners continuing commitment to invest in the district centre, notwithstanding extremely challenging market conditions for retail development in the UK. Given the age of the centre, significant investment is needed to provide modern retail and associated facilities, in the light of changing retail patterns such as the internet and growing competition from other locations.

The Trustees welcome the Council's preparation of the Core Strategy and are keen to see its early examination and adoption. The Trustees support the strategic objectives of the Core Strategy as set out at paragraph 3.21 that *"...by 2028 Medway will have experienced major change and that Chatham will be transformed into a city of regional significance"*. We note that Policy CS1 gives priority to the *"...established regeneration programme"*, including major physical change in Chatham centre, including significant new retail floorspace between Best Street and the Brook and expansion of the Pentagon Centre.

These representations reflect the Trustees key concerns, namely that the Core Strategy should set out a balanced and flexible retail and town centres strategy capable of delivering the intended regeneration benefits on the ground. Our representations are therefore focused on the draft Core Strategy's economic development and retail policies and their spatial expression in the area plans. However, the Trustees reserve the right to comment further on other parts of the plan as it emerges.

As the long standing owner of the Hempstead valley centre, with investment plans for the future, it is also the Trustees wish to be represented at the examination in public of the Core Strategy

Retail and town centres

We note that paragraph 6.37 states that the current retail hierarchy is being retained, consisting of the primary centre (Chatham) and the five District centres, including Hempstead Valley Shopping centre.

The Council's own retail study (Nathaniel Lichfield and Partners- NLP -March 2009, as revised June 2009), provides the evidence base upon which the Core Strategy's retail strategy and its policies are based. The NLP study sets out four scenarios to model the need for additional retail in Medway over the plan period. We note that the draft Core Strategy at table 6.5 sets out three scenarios for comparison goods, namely one scenario which assumes "constant market" share (with high population growth) and two "increased market" share scenarios (with baseline and high population growths assumptions).

These scenarios identify need for additional comparison retail of between 23,750 sqm net (constant market share) and 41,363 sqm net (increased market share with high population growth) up to 2016 (i.e. the first five years of the plan) in Medway. Over the whole plan period 2011-2026, the forecasts range from between 76,775 sqm m net (constant market share) and 99,958 sqm net (increased market share with high population growth).

The increased market share scenarios reflect trade leakage outside the district as set out in the NLP study. NLP also recommend (Para 13.80 of the 2009 study) that the leakage can be "clawed

back" if a critical mass of new retail development can be delivered in Chatham town centre.

Paragraph 6.50 the draft Core Strategy calls for at least 30,000 sqm gross of additional comparison floorspace to be brought forward in Chatham to *".....radically change the perception of the centre and its range of shops and attract larger retailers"*. Paragraph 6.51 continues that the district centres role *"....will complement Chatham by providing convenience and comparison shopping facilities and other services catering for their immediate catchments"*.

Therefore the draft Core Strategy's overall retail strategy hinges on delivering major new retail development in Chatham. This flows into Policy CS19 draft Core Strategy which, in a departure from the NLP recommendation, sets out provision for 50,000 sqm gross comparison for Chatham town centre, and a combined provision for Chatham, the district centres and Lodge Hill of 81,400 sqm gross in Medway over the plan period (i.e. up to 2026).

When compared with Table 6.5 of the draft Core Strategy which sets out the forecast comparison retail need, the provision in CS19 exceeds the identified need for comparison retail up to 2016, but is justified in the higher market share scenarios beyond 2016, as derived from the evidence base. In other words it appears clear that the draft Core Strategy is based on the increased share scenarios.

We note Policy CS19 does not indicate the likely delivery dates of the additional retail space to be provided for in Chatham and the district centres. However, the Infrastructure Delivery Schedule (table 11.02) of the draft Core Strategy does set out expected delivery dates.

From the schedule at table 11.02 we note that there are two key schemes indicated for Chatham, which we assume are intended to provide "critical mass" to claw back expenditure. These are an 15,000 sq m extension to the Pentagon Centre which is scheduled to be delivered between 2016 - 2021, and a major new allocation at Best Street and High Street consisting of 28,000 sqm scheduled to be delivered between 2021 - 2026.

As noted we support the Council's strategy to regenerate Chatham town centre and recognise that major town centre development takes time. However, we also note this is not a new aspiration of the Council, indeed it is also the key objective of the saved Policy R1 of the Local Plan 2003.

We are therefore concerned that the underlying retail strategy is dependent on proposals which on the Council's own assessment are at best medium term (post 2016) and in the case of the key critical mass scheme (high Street/Best Street) long term i.e. post 2021. To be found sound we consider that it is vital that the draft Core Strategy's retail strategy also addresses the first five years of the plan period (2011-2016).

In this regard, we note from the Infrastructure Delivery Schedule (table 11.02), that up to 2016 there is a significant shortfall of retail sites provided for, as compared with identified need as set out in Table 6.5. Given PPS4 requires local planning authorities to identify need and then allocate sites to meet that need, we consider there is a danger that the draft Core Strategy would be unsound in that it "back loads" much of the proposed retail development to 2021- 2026 period. This is against an evidence base which identifies considerable need in the early plan period and the NLP surveys which show there is considerable expenditure currently leaking out of the district.

If the Council does not employ a more flexible approach and provide for more retail space which is capable of being delivered within the town and district centres in the early part of the plan period, Medway will be faced with growing expenditure leakage and growing pressure for retail proposal for less sequential preferable sites. We do not consider this to be a desirable or sustainable development policy as it is not in the interests of Medway and its residents

As such we question whether the current retail strategy as set out in the draft Core strategy is sound in the terms set out at PPS12. A retail evidence base has been prepared, but the draft Core Strategy seems not to allocate sufficient provision to meet the identified need especially at the front end of the plan period. Moreover, whilst we agree with the goal of regenerating Chatham, the

deliverability of this is untested, and even on the Council's own evidence the extended time frame renders this goal considerably less likely. It follows that we consider that there is a demonstrable absence of reasoned alternatives and flexibility as required by PPS12.

Policy CS19 makes provision for 2,800 sq m gross of comparison retail for Hempstead Valley. It is unclear where this figure is derived from as it does not appear to reflect the NLP evidence base. What is clear from the NLP evidence base is that Hempstead Valley, of all the town and district centres in Medway, is the one centre which offers consumers more modern albeit ageing retail facilities. Hempstead Valley is also capable of delivering new retail development early in the plan period. This is against the backdrop of expenditure leakage out of the district particularly to Maidstone, where Hempstead Valley is geographically well located to help prevent that leakage.

We therefore consider the Council needs to give consideration to a greater level of investment into Hempstead Valley than that set out in the draft Core Strategy at Policy CS19. This would not challenge Chatham's higher order status. Hempstead Valley is a designated district centre as opposed to a primary centre, it is considerably below Chatham in the NLP national rankings (393 compared with 188 for Chatham), is substantially smaller and has a much more localised catchment than Chatham. We also consider it significant to note that from the NLP survey that Chatham loses comparatively little expenditure to Hempstead Valley.

By encouraging more retail and associated investment at Hempstead Valley, Medway would have a centre which is capable of helping deliver on the ground some of the quantitative and qualitative needs of the district in the early part of the plan period. Given Hempstead Valley's location in the south east of the district, this would in particular claw back trade being lost to Medway's largest competitor, namely Maidstone. This would still leave more than sufficient identified need for Chatham to be developed as envisaged by the draft Core Strategy post 2016 and post 2021,nor would it adversely impact on the investment prospects of the other centres.

We consider that without this more flexible and deliverable policy response, there is a real concern that Medway's shoppers will continue to vote with their feet and take their expenditure out of the district. If this were to happen then the prospect of any major comparison retail in Chatham at any point in the plan period will significantly recede. In effect the draft Core strategy objectives to deliver development after 2016 and post 2021 may be too little too late.

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We therefore respectfully request that Policy CS19 should be redrafted to reflect a more flexible approach for Hempstead Valley. This should include deleting the current reference to Hempstead Valley in the policy and inserting a new bullet point to state:

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Policy CS30 sets out area policy for the Rainham area. We note that Rainham is incorrectly referred to in the policy as a "town" centre when it is clearly stated at Para 6.37 that it is a district centre. We note that Hempstead Valley which the draft Core Strategy recognises has development potential is not included on figure 10.7 as a district centre. We ask that these factual matters are corrected.

Policy CS30 sets out that *"....new retail investment should focus on maintaining the current competitive position of the centre and not be of a scale that would divert investment from other centres and Chatham in particular"*.

We do not consider this to be a sound policy. It appears to be based on the view that because Hempstead Valley has more modern facilities than the other district centres in Medway, then it is has a "competitive position". This is far from the case. In reality Hempstead Valley is over 30 years old, it is showing clear signs of age, has too few "right sized" units for modern retailers and is under pressure from other much more modern centres such as Maidstone as well as the internet and other special forms of trading.

The Trustees are committed to investing in Hempstead Valley for the future, but this requires the clear support of the Council with a more flexible policy approach which recognises Hempstead Valley's ability to deliver additional new retail and associated district centre facilities, in the short to medium terms as well as continued investment over the longer term.

7. **Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

We respectfully request that the Council adopts a more flexible and positive approach to further retail development at Hempstead Valley, in keeping with the overall goal of being of scale which does not divert investment form other centres (which based on the draft Core Strategy will in any event be some way off).This could be s achieved by amending Policy CS30 to state:

"Hempstead Valley is a district centre and new retail investment will be encouraged to enhance its competitive position, ensuring new development is of scale that would not divert investment from Chatham in particular and the other district centre"

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations at the submission stage.

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Medway Publication Draft Core Strategy Consultation

Ref:
Date received:
(Official use only)

Medway Core Strategy
Publication Draft Core Strategy
Consultation 30th August - 14th October 2011

Representation Form

Please return to:
Post: Development Plans and Research, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR or
E-mail: ldf@medway.gov.uk no later than 5 p.m. on Friday, 14th October 2011.

This form has two parts –
Part A – Personal Details
Part B – Your representation(s).
Please fill in a separate sheet for each representation you wish to make.

We will accept photocopies of this form or you can download copies from the Council's website at: **http://www.medway.gov.uk/ldf**

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Part A	1. Personal Details*	2. Agent's Details (if applicable)
Title (Mr. Mrs. Miss		MISS
First Name		EMMA
Last Name		BEARDMORE
Job Title (where relevant)		PLANNING ASSOCIATE DIRECTOR
Organisation (where relevant)	TRUSTEES OF HEMPSTEAD VALLEY	GL HEARN
Address		20 SOHO SQUARE LONDON
Post Code		W1D 3QW
Telephone Number		020 7851 4900
E-mail Address (where relevant)		emma_beardmore@glhearn.com

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the DPD does this representation relate?

Paragraph		Policy	CS30	Proposals Map, Figure or Table.	

4. Do you consider the DPD is:

	Yes	No
4.(1) Legally compliant		
4.(2) Sound *		✓

* The considerations in relation to the DPD being 'Sound' are explained in Planning Policy Statement 12 in paragraphs 4.36 – 4.47, 4.51 and 5.52 and the boxed text. (See associated 'Guidance Notes for Submitting Representations').

If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified	
(2) Effective	✓
(3) Consistent with national policy	✓

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy CS30 sets out area policy for the Rainham area. We note that Rainham is incorrectly referred to in the policy as a "town" centre when it is clearly stated at Para 6.37 that it is a district centre. We note that Hempstead Valley which the draft Core Strategy recognises has development potential is not included on figure 10.7 as a district centre. We ask that these factual matters are corrected.

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8. **If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?**

☐ No, I do not wish to participate at the oral examination

☑ Yes, I wish to participate at the oral examination

9. **If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

As the long standing owner of the Hempstead Valley centre, with investment plans for the future, it is the Trustees wish to be represented at examination in public of the Core Strategy.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: Emma Beardmore

Date: 14-Oct-2011

Data Protection Statement: The information you provide will be held and used by Medway Council, in accordance with the Data Protection Act 1998, to help in the preparation of the Medway Local Development Framework and related planning policy issues. Please note that all responses received will be available for public inspection and will be placed on the Council's website. Your personal details will however remain confidential.

Medway Serving You

EQUALITY & DIVERSITY MONITORING FORM

The information that you provide on this form will be used for monitoring and will not be used for any other purpose or stored electronically. Information will be used in aggregate form only and where there are less than 3 people providing a response this will not be reported.

AGE				
Please choose one option only.	0-9	☐	50-59	☐
	10-19	☐	60-69	☐
	20-29	☐	70-79	☐
	30-39	☐	80 & over	☐
	40-49	☐		

I prefer not to answer this question ☐

CARING RESPONSIBILITIES

Do you have caring responsibilities (ie for children, parents or others)? Please choose one option only.

Yes ☐ No ☐ I prefer not to answer this question ☐

DISABILITY STATUS

Do you consider yourself to be a disabled person i.e. may experience discrimination on grounds of impairment or long-term health condition? Please choose one option only.

Yes ☐ No ☐ I prefer not to answer this question ☐

If yes, please choose all the relevant options.

Physical impairment	☐	Sensory impairment	☐
Mental health condition	☐	Learning disability / difficulty	☐
Memory impairment	☐	Visibly different	☐
Long-standing illness or health condition	☐		

Any other impairment ☐ - please specify below

.....

GENDER

Please tick one box only Male ☐ Female ☐

I prefer not to answer this question ☐

MARITAL / CIVIL PARTNERSHIP STATUS

Please choose one option only (the one that best describes your status).

Married or in a civil partnership	☐	Divorced or dissolved civil partnership	☐	Separated, but still legally married or in a civil partnership	☐
Widow or widower	☐	Surviving partner from a civil partnership	☐	Living with someone	☐
Single	☐				

I prefer not to answer this question ☐

POST CODE

Please write your Post Code W1D 3QW

RACE AND ETHNICITY

Please choose one option only (the one that best describes your racial/ethnic origin).

White	British	☐			
	Irish	☐			
	Any other White background	☐	- please specify below		
	.....				
Multi-Ethnic	White & Black Caribbean	☐	White & Black African	☐	
	White & Asian	☐			
	Any other Multi-Ethnic background	☐	- please specify below		
	.....				
Asian or Asian British	Indian	☐	Pakistani	☐	
	Bangladeshi	☐	Chinese	☐	
	Any other Asian background	☐	- please specify below		
	.....				
Black or Black British	Caribbean	☐	African	☐	
	Any other Black background	☐	- please specify below		
	.....				
Other	Arab	☐			
	Gypsy/Romany/Traveller of Irish Heritage	☐			
	Any other Ethnic background	☐	- please specify below		
	.....				

I prefer not to answer this question ☐

RELIGION AND BELIEF

Do you belong to a particular religion or hold a particular belief? Please choose one option only.

Yes ☐ No ☐

If Yes, which option best describes your religion or belief? Please choose one option only.

Agnostic	☐	Hindu	☐	Pagan	☐
Atheism	☐	Humanist	☐	Sikh	☐
Buddhist	☐	Jewish	☐		
Christianity (all denominations)	☐	Muslim	☐		
Other religion/belief	☐	- please specify below			

.....

I prefer not to answer this question ☐

SEXUAL ORIENTATION

Please choose one option only (the one that best describes your sexuality).

Bisexual	☐	Gay woman/Lesbian	☐
Gay man	☐	Heterosexual/Straight	☐
Other	☐	please specify below	

.....

I prefer not to answer this question ☐

Protecting your personal information

Medway Council will keep the information provided above as confidential. Access to, retention and disposal of this information will be strictly in accordance with data protection requirements. It will be used solely to ensure that Medway Council meets its obligations under equality legislation. Individuals will not be identifiable in any reporting.

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Ref:
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Publication Draft Core Strategy
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Part A	1. Personal Details*	2. Agent's Details (if applicable)
Title (Mr. Mrs. Miss		MISS
First Name		EMMA
Last Name		BEARDMORE
Job Title (where relevant)		PLANNING ASSOCIATE DIRECTOR
Organisation (where relevant)	TRUSTEES OF HEMPSTEAD VALLEY	GL HEARN
Address		20 SOHO SQUARE LONDON
Post Code		W1D 3QW
Telephone Number		020 7851 4900
E-mail Address (where relevant)		emma_beardmore@glhearn.com

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the DPD does this representation relate?

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We note that Hempstead Valley, which the draft Core Strategy recognises has development potential is not included on Figure 10.7 as a District Centre.

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Signature: Emma Beardmore

Date: 14-Oct-2011

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10-19	☐	60-69	☐
20-29	☐	70-79	☐
30-39	☐	80 & over	☐
40-49	☐		

I prefer not to answer this question ☒

CARING RESPONSIBILITIES

Do you have caring responsibilities (ie for children, parents or others)? Please choose one option only.

Yes ☐ No ☐ I prefer not to answer this question ☒

DISABILITY STATUS

Do you consider yourself to be a disabled person i.e. may experience discrimination on grounds of impairment or long-term health condition? Please choose one option only.

Yes ☐ No ☐ I prefer not to answer this question ☒

If yes, please choose all the relevant options.

Physical impairment	☐	Sensory impairment	☐
Mental health condition	☐	Learning disability / difficulty	☐
Memory impairment	☐	Visibly different	☐
Long-standing illness or health condition	☐		

Any other impairment ☐ - please specify below

.....

GENDER
Please tick one box only

Male ☐ Female ☐

I prefer not to answer this question ☒

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- Separated, but still legally married or in a civil partnership ☐
- Widow or widower ☐
- Surviving partner from a civil partnership ☐
- Living with someone ☐
- Single ☐
- I prefer not to answer this question ■

POST CODE

Please write your Post Code W1D 3QW

RACE AND ETHNICITY

Please choose one option only (the one that best describes your racial/ethnic origin).

White
- British ☐
- Irish ☐
- Any other White background ☐ - please specify below

.....

Multi-Ethnic
- White & Black Caribbean ☐
- White & Black African ☐
- White & Asian ☐
- Any other Multi-Ethnic background ☐ - please specify below

.....

Asian or Asian British
- Indian ☐
- Pakistani ☐
- Bangladeshi ☐
- Chinese ☐
- Any other Asian background ☐ - please specify below

.....

Black or Black British
- Caribbean ☐
- African ☐
- Any other Black background ☐ - please specify below

.....

Other
- Arab ☐
- Gypsy/Romany/Traveller of Irish Heritage ☐
- Any other Ethnic background ☐ - please specify below

.....

I prefer not to answer this question ■

RELIGION AND BELIEF

Do you belong to a particular religion or hold a particular belief? Please choose one option only.

Yes ☐ No ☐

If Yes, which option best describes your religion or belief? Please choose one option only.

- Agnostic ☐
- Hindu ☐
- Pagan ☐
- Atheism ☐
- Humanist ☐
- Sikh ☐
- Buddhist ☐
- Jewish ☐
- Christianity (all denominations) ☐
- Muslim ☐
- Other religion/belief ☐ - please specify below

.....

I prefer not to answer this question ■

SEXUAL ORIENTATION

Please choose one option only (the one that best describes your sexuality).

Bisexual	☐	Gay woman/Lesbian	☐
Gay man	☐	Heterosexual/Straight	☐
Other	☐	please specify below	

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