

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 17:45
To: futuremedway
Subject: Policy T4 Rochester Airport

Categories: Blue Category

To whom it may concern

I want to register my concerns relating to the proposed Policy T4 for aviation in Medway.

I do not agree with the policy as the proposal to close 16/34 cross runway will intensify aircraft departures and arrivals on to the other runway creating serious safety issues. It is dangerous for local residents, schools and care homes in the area as well as for users of the HS1 and M2 motorway. It will overburden those in its path with more noise as well as causing more environmental damage. Increased usage will also impact the infrastructure (or lack of!) around the airport.

A comprehensive public safety study needs be undertaken to highlight the above issues before further commitment by the council.

If Medway Council intend to continue flying at Rochester airport they need to retain both runways to ease the burden and spread safety and environmental risks.

Yours faithfully
Pam Stockbridge

Sent from my iPad

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 21:50
To: futuremedway
Subject: Medway Council Local Plan

Categories: Blue Category

With regard to the local plan I would like to voice my opinion. Myself and my family have lived happily in Hoo for the last 32 years, all 3 of our daughters completing their education successfully through the local primary and comprehensive school and attending local activities within the village but that is all changing now with more houses being built Hoo is no longer a small village.

Our house backs onto the old BP Social Club which as you are aware new houses are being built, when we moved here we were informed that the land would never be built on as it was recreational land. Since work has started on this site it has caused families who back onto the land a lot of distress. This is due to the noise of diggers being used before 8 00 a.m. on a Saturday, dust from the site and now we all have rats running into our back gardens meaning we are now unable to have our back door open in the evenings. We are also losing the beautiful view we all had of the surrounding countryside, a few years ago plans were submitted for a sports complex to be built which would have been a lot better than houses especially as Deangate Golf Course is now closed, Bellways have on their website that Deangate Golf Course is still available to use. The traffic in and out of the village is getting worse that's without more houses now, the doctors appointments are difficult to go to and elderly people are unable to travel to surgeries that are held in other villages. Also the naming of the new houses are very inappropriate, Nightingale Rise.

Kind Regards

Mrs Julie West

[REDACTED]

From: [REDACTED]
Sent: 25 June 2018 22:21
To: futuremedway
Subject: Draft Local Plan public comment

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

I would be grateful for an acknowledgement to my Local Plan submission.

Thank you for asking for views and observations pertaining to the following draft policy:

Policy T4: Rochester Airport

Rochester Airport will be safeguarded to provide an enhanced aviation facility for business, public service, training, heritage and leisure uses, and support the development of a strategic gateway and an economic hub.

Proposals will need to demonstrate how any impacts will be mitigated, including air quality, noise, traffic, and amenity.

Question T7:

Do you agree with the proposed policy for aviation in Medway?

What alternative approach would you propose for planning policy for aviation in Medway?

I do not agree with Draft Policy T4 or the safeguarding Rochester airport for the following reasons:

Draft policy T4 is contrary to the adopted Medway Local Plan 2003 and saved policies which does not safeguard flying or guarantee continue of aviation at the site.

Policy T23 of the current adopted plan sets out the criteria against which any future proposals for aviation related development will be measured.

- Medway Council has failed to prove that the continuation of aviation at the site alongside a Technology Park development will not result in (T23) (v) the impact upon residential and other noise sensitive properties and (vii) other environmental and social impacts; which would include but not be limited to increased noise, public safety, endangerment to life, air quality and enjoyment of life for nearby residents. All of which fall within Medway Council's duty of care liability and not the CAA.

Draft Policy T4 acts contrary to the Government publication Planning Policy Statement 12: 'Local Spatial Planning' (PPS12): PPS12 which stresses the importance of community involvement in the plan-making process and hence the role of Medway Statement of Community Involvement (Jan 2012).

- Medway Council has no public mandate for the continuation of aviation at the Rochester airfield site in favour of possible alternative employment development options for the entire site without aviation within the last 15 years.

- Public Consultation on the future of Rochester Airport (July - Sept 2103) returned 908 responses. Over 90% opposed the plans.
- No other political party in Medway support the Conservative airport redevelopment plan with the continuation of flying or tax payers investment.

Draft Policy T4 looks to enhance aviation at the site concentrating all departure and arrival flights towards the AONB. It is in conflict with the Medway Council's policy and adoption of the Kent Downs Area of Outstanding Natural management plan and adopted Policy BNE32: Areas of outstanding natural Beauty. Specifically (iv) Any detrimental impact on the environment or landscape,

Draft Policy T4 is in conflict with the Medway Sustainable Community Strategy 2010 by not considering alternative employment strategies for the full site which does not include low employment per hectare general aviation.

- The valuable land asset of Rochester airfield can deliver more benefit and value for money to the community as a site for a new hospital, part recreational use with larger business and retail park without the retention of aviation at the site.
- The South East Enterprise Partnership (SELEP) technical Evaluation stated that the investment of £4.4 million into the airport infrastructure alone returned poor value for money.

The continuation of general aviation at the Rochester Airport site for leisure, training and sports (80% of activity at the site) is not essential as Medway has a second CAA licensed general aviation airfield at Stoke less than 15 minutes drive from Rochester.

While it may be argued that the CAA licenced Stoke airfield is constrained due to nearby power lines the hazard is acceptable to pilots as a liability of flying at the site. If they were dangerous the CAA would not licence the airfield.

In contrast Rochester Airport is severely constrained by the eight lane M2 motorway and High-speed Rail (HS1) rail line perpendicular to and within 200-400 metres from the end of the retained runway. The enhancement and continuation of general aviation at the site recklessly and unnecessarily increases the risk of a fatal incident for unwitting travellers on the critical SRN and 125mph train line.

Draft Policy T4 seeks not only to deny the public the rightful value for money for the entire airfield land asset but seeks to mislead by inferring mitigation of any impact can be achieved when for the past five years Medway Council and airport operator have failed to do so.

Draft Policy T4 is in conflict to the council's previous removal of airfield land to build the Horsted Retail park and west side industrial estate.

Draft Policy T4 infers heritage status for the continuation of aviation at the site yet it has no National Heritage status, the airfield was not even a WWII Battle of Britain fighter base.

The Medway Aeronautical Preservation Society (MAPS) to which the "Heritage" component of Draft Policy T4 may refer does not require an airfield for its good work. It's inclusion in the draft policy to safeguard the airport is misleading and not appropriate.

Draft Policy T4 and the enhancement of the airport facility is in conflict with adopted policy BNE2: Amenity Protection. Specifically: protect those amenities enjoyed by nearby and adjacent properties privacy, noise, vibration and activity levels.

From the above observations it must be concluded that draft Policy T4 is completely unacceptable and that it seeks to undermine the rights of local residents by Medway Council leaders and officers attempting to safeguard and enhance an airport facility for which there is no justification, compelling reason or local community support.

Medway Council have failed to establish a critical and unequivocal reason for the inclusion of policy T4 in the emerging local plan.

The airport safeguarding and enhancement policy itself not only threatens residents lives but attempts to rob the community of a valuable land asset which would rightfully return a far higher value for money and social-economic benefit. It is an ill conceived policy without grounds which the government Planning Inspectorate will question.

There is no compelling argument or impact mitigation which supports the policy or continuation of aviation at the site at the physical and financial detriment to the community. Draft policy T4 should be removed from the emerging Medway Local Plan.

Yours sincerely

Bill McLennan



Sent from [Mail](#) for Windows 10

From: [REDACTED]
Sent: 25 June 2018 22:59
To: futuremedway
Subject: Development Strategy Document - Rochester Airport

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

With regard to the above document regarding the proposed changes to Rochester Airport in particular Policy T4 Rochester Airport and Question T7 I would like to make the following points –

I feel that the £4.4 million business infrastructure improvement proposed by Medway Council leadership along with the closure of the 16/34 runway is extremely dangerous for us local residents and the users of the HS1 and M2 Motorway.

The improvements of new hangars, control tower, fuelling, parking etc and the reduction from two to one runway will intensify aircraft departure and landing, and will overburden the local area with noise and endanger lives. Surely if the leadership of Medway Council say the airport is an important asset, why would they take away one of the existing runways.

Why has there never been a public safety study regarding the closing of the cross runway. The Medway Council nor Rochester Airport Ltd have undertaken a full and comprehensive Public Safety Study. The CAA is not responsible for public safety, Medway Council are. The airport reconfiguration has not been proven to be safe for the public.

I understand that the airport operator is unwilling to pay for the recent overrun of costs for the paved runway deemed to underpin the mitigation of additional noise and purported to increased safety for pilots is now dropped. The airport reconfiguration has not been proven to be safe for the public.

The 25 year airport lease contains a deed of revocation which permits the airport operator to walk away from the contract with no penalty, this is not right. The adopted Medway Local Plan and saved policies do not safeguard the airport or continuation of flying at the Rochester airport site.

Rita Mew

Arriva Kent and Surrey: Responses to Medway Development Plan.

T1 – Yes; from a bus perspective it is important to realise that buses will not replace other modes of transport, but when properly integrated into the transport network can provide additional choices that mean that growth does not simply clog roads with more traffic. This can only happen however when the bus is an attractive alternative to other modes (or at least seamlessly integrates with other modes).

The key to a sustainable approach is to ensure that by reducing public transport journey times and improving connections between routes and transport modes, the overall door to door journeys are not disproportionate to using the car.

For buses, this can be achieved by using bus priority measures or dedicated “busways” (note the successful use of bus-rapid-transit routes in Luton and Cambridge), by allowing buses closer access to town centre attractions and railway stations than the car and a strong partnership with the local operator to invest in both the frequency and hours of operation of core routes.

T2 – We agree that the approach of increasing density at areas around rail stations will help sustainability, however, good public transport options can also exist in periphery areas, if the road networks are designed in such a way that allows quick and direct access by bus. The lower densities in these areas can be compensated for by “joining” areas together to make a viable level of demand for a frequent service. This can only be achieved if the additional demand does not cause the bus to have to deviate too far from the “natural” line of route (so the perception of the journey is similar to if you chose to navigate yourself).

A virtuous circle can be created by joining up areas of demand to increase passenger numbers, which can then be used to justify increases in service frequency, which in turn can generate even higher levels of bus use.

T3 – As per Question T2; public transport use is “non-linear” because higher densities lead to higher levels of service, and this in turn makes the public transport offer more attractive.

T4 – Minimum densities in the periphery area would help for the reasons set out in the response to question T2; but it’s more critical from a bus use point of view that any development has easy access out onto a main trunk route for the bus to serve that area. A bus that has to negotiate small roads, a long way from the main access route is not then attractive to other bus users that may be travelling from other locations. It is essential that we can join these developments up in a logical manner, as no one single development in the periphery is likely to be of sufficient size and density in its own right to justify a frequent enough level of service to be an attractive alternative.

T5 – The approach also needs to consider other transport requirements for the area; the plan focuses on the density around stations, which caters well for commuters and travel needs between the local centres in Medway, but does not consider other travel needs like leisure (currently focussed around Dockside retail, Hempstead Valley and Medway Valley Park). Transport links to these locations will be essential if residents in the core and primary areas are to consider using public transport as their “mode of choice”.

In addition it should be remembered that there is a significant demand between Medway and Maidstone that is not currently well served by Rail (in terms of directness and journey times); this has potential to be a significant corridor for bus services.

T6 – provided any extension to the rail network is properly integrated into the local transport network, this would appear to be a positive proposal.

T7 – As the airport is not likely to be used for commercial flights, we have no strong opinion on how this is developed, other than supporting any proposal that provides additional employment in an area that can be well served by the local bus network.

T8 – development that secures additional employment in the heart of Medway will help in the development of sustainable transport links, provided the areas of development have sufficient density to justify a reasonable frequency of service. The use of disused railways (particularly the bridge that crosses Pier Road) to create “busways” has been proven in other locations to help generate demand for public transport, at least in cases where such methods can be used to significantly reduce journey times.

T9-T13 – no comment from a public transport perspective

T14 – This is an important aspect of any new development; convenient access to bus services for residents, without the bus needing to divert into side streets is an important planning issue. The environment around bus stops is equally important as comfort, safety and security are essential. So areas for connecting with bus services need to be open, well lit, safe from other traffic hazards, but at the same time offer protection from the weather.

We offer the suggestion of dedicated or high profile ‘beacon routes’ where each part of the delivery of bus services are aligned so as to have maximum benefit, to challenge perceptions of bus services and to generate that spark that sees transport by bus as the transport choice for new residents as soon as they move into the area/development. This is key to successful city living and will only contribute to Medway’s desire to achieve city status.

T15 – It is important to emphasise that simply restricting car parking spaces or using “parking courts” does not in itself deter car ownership and increase public transport use. We can give multiple examples of where attempts to restrict car ownership has simply caused parked vehicles to block the access roads and make it impossible for the development to be served by public transport. It’s essential for us that issues raised in question T14 are addressed, so that bus provision can be attractive enough to reduce the number of cars needed (it doesn’t work the other way around).

The policy appears to cover parking for residential developments, but does not cover parking in the central areas, rail stations, etc. In order to promote sustainable transport, consideration should be given to prioritising bus access to key locations over the provision of car parking spaces, and the council should have a clear policy on parking charges to ensure that parking is not always the cheapest option.

There are multiple examples of where cycle sharing schemes can be used in an integrated way with public transport; it could be argued that such schemes could be developed in partnership with existing transport providers without the need for a formal policy change.

June 2018.

Transport

- 11.1 A sustainable and effective transport network is intrinsic to how places work well, and is a fundamental component of successful growth. Transport is one of the most high profile matters associated with development. Consultation on the emerging Local Plan has confirmed concerns about existing pressures on transport networks and their capacity to accommodate growth. These concerns are substantiated in the technical transport assessments being carried as part of the evidence base for the new Medway Local Plan.
- 11.2 Medway benefits from high levels of accessibility to rail and motorway links, but also experiences congestion and a complex highways network, resulting from its geography and historical pattern of development. Transport provides some of Medway's key opportunities for sustainable growth, but also presents some of the greatest challenges. In planning for a successful University waterfront city by 2035, it is essential that considerations of how people will move around form the core of Medway's growth strategy. This will also inform the character of a revitalised urban centre, with an attractive, accessible and inclusive public realm.
- 11.3 Medway's key location in north Kent brings additional transport considerations. The council is committed to working with transport planning agencies, neighbouring authorities and partnerships to coordinate planning and investment in strategic transport networks. Plans for the Lower Thames Crossing to the east of Gravesend will have impacts for Medway and the local and strategic road network. Developments planned to the east of Medway including Ebbsfleet and the proposed London Entertainment Resort, and associated road schemes are also key considerations. Extensions to rail services and connections, such as Crossrail, form part of the wider transport strategy. Medway's wharves are of regional and national importance. The river defines Medway, and there is much support to open up access and realise opportunities for regeneration. The England Coastal Path will run along the land to the south of the Medway Estuary and around the Hoo Peninsula.
- 11.4 The transport policies have been prepared in accordance with national planning policy and the Medway policy framework,¹⁴³ including the Local Transport Plan

¹⁴³ Medway Council, 'Medway Council Plan (2016-21)', Available at:
<http://www.medway.gov.uk/pdf/Council%20Plan%20201617%20Final.pdf>

Medway Council 'Joint Health and Wellbeing Strategy for Medway (2012-17)', Available at:
<http://www.medway.gov.uk/pdf/Joint-Health-and-Well-being-Strategy-for-Medway-2012-2017.pdf>

Thames Gateway Kent, 'Thames Gateway Kent Plan for Growth (2014-20)', Available at:
<http://www.tgkp.org/content/documents/TGKP%20Growth%20Plan%20brochure%20%20-%20web.pdf>

Medway Council, 'Medway's Cultural Strategy (2014-19): Rich heritage-great future', Available at:
<https://democracy.medway.gov.uk/mgconvert2pdf.aspx?id=25118>

(LTP),¹⁴⁴ which provides the transport strategy for the period 2011 to 2026. The LTP is supported by the Cycling Action Plan (2016-18)¹⁴⁵ and the Public Rights of Way Improvement Plan (2007-17).¹⁴⁶ Responses to previous consultations and the emerging evidence base have informed the scope and detail of the policies.

- 11.5 Transport issues are among the most frequent and contentious issues raised during the previous two consultations on the emerging Local Plan . It is important to note however that planning policies must relate to the development and use of land, while other strategies, including the LTP, will directly deliver improvements to transport.
- 11.6 The council has commissioned a Strategic Transport Assessment (STA) as a key component of the evidence base. It is used to assess the existing situation and determine the transport implications of potential site allocations, providing an understanding of the cumulative and site specific impacts in terms of the capacity of the road network and the associated safety issues. The STA will inform strategic and specific mitigation requirements for sites allocated for development in the Local Plan.
- 11.7 High level modelling indicates that key junctions across Medway and especially in Chatham town centre will exceed capacity by 2035. However, several junctions in Chatham are already exceeding or operating close to capacity. Modelling to date has not included mitigation or sustainable transport initiatives, i.e. it has presented a 'Do nothing' scenario. A strategic approach to joint land use and transport planning will be required to avoid reinforcing unsustainable historic travel patterns and deliver transformative change.
- 11.8 The policies set out below comprise a fundamental approach to the overall Development Strategy, critical infrastructure improvements, travel demand measures and other initiatives concerning the development and use of land. Further evidence base work will determine the range and location for transport facilities to support Medway's growth, including the public transport network, provision for walking and cycling, highways improvements, parking, including consideration of a park and ride facility. These policies will need to be complemented by Transport Assessments, Transport Statements and Travel Plans.
- 11.9 This consultation document presents strategic policies that will contribute to the delivery of the vision and strategic objectives. These policies should also be considered in the preparation of the South East Local Enterprise Partnership's new Strategic Economic Plan, provide a foundation for Medway's participation in Transport for the South East and support Medway's refreshed Regeneration Strategy, Medway 2035.

¹⁴⁴ Medway Council, 'Medway Local Transport Plan 2011-2026', Available at: http://www.medway.gov.uk/pdf/Local_Transport_Plan_2011-2026.pdf

¹⁴⁵ Medway Council, 'Medway's Cycling Action Plan 2016/18', Available at: <http://www.medway.gov.uk/pdf/CyclingActionPlan2016-18.pdf>

¹⁴⁶ Medway Council, Movement in Medway, 'Medway's Public Rights of Way Improvement Plan 2007-2017,' October 2017, Available at: http://www.medway.gov.uk/pdf/public_rights_of_way_improvement_plan.pdf

Policy T1: Promoting sustainable transport

The council will work with the relevant authorities and transport providers to:

- support the Medway Local Transport Plan (2011-26) and subsequent iterations during the plan period, along with the associated three-year Implementation Plans and strategies
- ensure development is located and designed to enable sustainable transport
- mitigate the impacts of new development according to Transport Assessments and Transport Statements, or refuse development where its residual cumulative impacts are severe
- require a Travel Plan for development which will generate significant amounts of movement
- plan for strategic road network and rail improvements
- improve public transport provision and the walking and cycling network
- develop an integrated transport strategy for Medway to deliver sustainable growth
- identify the need for and if required define the location for park and ride facilities.
- engage with the relevant authorities to address the impacts of the proposed Lower Thames Crossing
- undertake any necessary revisions to the adopted Parking Standards
- improve air quality as a result of vehicular emissions

Question T1:

Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?

What do you consider would represent a sound alternative approach towards sustainable transport in the Medway Local Plan?

Integrating Land Use and Transport Planning

11.10 National planning policy states that Local Plans should “support a pattern of development which facilitates sustainable transport.”¹⁴⁷ More specifically, national planning policy states that the “transport system needs to be balanced in favour of sustainable transport, giving people real choice about how they travel.”¹⁴⁸ This is supported by the government’s 2017 Cycling and Walking Investment Strategy, which aims to “make cycling and walking the natural choices for shorter journeys, or as part of a longer journey.”¹⁴⁹

¹⁴⁷ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 4, Paragraph 30, pg.9, 2015 Available at:

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

¹⁴⁸ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 4, Paragraph 29, pg.9, 2015 Available at:

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

¹⁴⁹ Department for Transport, ‘*Cycling and Walking Investment Strategy*’, 2017, Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/603527/cycling-walking-investment-strategy.pdf

- 11.11 Regeneration is a key element of the vision and strategic objectives for Medway's growth to 2035. With this come opportunities to embed new approaches to transport planning and making the most efficient use of land. Appropriate sites can support higher density development in areas well served by sustainable transport options. Government policy and guidance^{150 151 152 153} supports this approach in boosting housing supply in proximity to rail stations. Linking development with sustainable transport is promoted as an approach to joint land use and transport planning by directing new, mixed use development to areas in close proximity to high-quality public transport. A renewed focus on the pedestrian and public space will enhance the attractiveness of the centre itself and the overall offer. This can reduce the need to travel and retain consumer spending within Medway. There are also potential benefits in reducing air and noise pollution and help in the transition to a low carbon economy. The council supports higher density development, including housing, in central areas within walking distance of the rail stations at Strood, Rochester, Chatham (and its bus interchange), Gillingham and Rainham, where appropriate to the specific site considerations.
- 11.12 It is important to recognise that travel choice is limited in peripheral areas which cannot support a viable bus service and this is a factor in car dependency. These areas may not present practical opportunities to maximise sustainable transport; however, the advent of new technologies, such as the 'ArrivaClick'¹⁵⁴ service operating in Swale, could transform bus services over the next 20 years. Meanwhile, the new rail franchise will be required to trial Pay-As-You-Go ticketing in Medway, such as through an Oyster-type card or Contactless payment card) to ensure ticketing is as seamless as possible.¹⁵⁵ This is a significant development to encourage rail travel in Medway. Initiatives for card travel across all public transport modes are important to improve ease of travel.
- 11.13 The council has analysed accessibility to key stations in Medway and defined zones to provide guidance on potential differentiation of densities to make the best use of land, and meet the vision and strategic objectives of the Local Plan. Further details

¹⁵⁰ HM Treasury, *'Fixing the foundations: Creating a more prosperous nation'*, July 2016, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443898/Productivity_Plan_web.pdf

¹⁵¹ Cities and Local Government Devolution Act 2016, <http://www.legislation.gov.uk/ukpga/2016/1/contents/enacted>

¹⁵² Department for Communities and Local Government, *'Proposed Changes to NPPF (Dec 2015)- Summary of Consultation Responses'*, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/589791/Proposed_Changes_to_NPPF_Dec_2015_-_Summary_of_consultation_responses.pdf

¹⁵³ Department for Communities and Local Government, *'Fixing our broken housing problem'*, February 2017, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

¹⁵⁴ Arriva, <https://www.arrivabus.co.uk/arrivaclick/>

¹⁵⁵ Department for Transport, *'Future of South Eastern Rail Services'*, November 2017, Available at: <https://www.gov.uk/government/consultations/future-of-south-eastern-rail-services>

are set out in the Housing Delivery technical paper supporting this consultation document. The approach is based on four walking zones centred on rail stations¹⁵⁶:

1. Core – within a 5 minute / 400 metre walk
2. Primary – within a 10 minute / 800 metre walk
3. Secondary – within a 20 minute / 1,600 metre walk
4. Periphery – all areas beyond the Secondary zone

11.14 These zones have been used to determine the optimum net residential densities shown in Table 11.1. Chatham will need to achieve the highest density as the city centre, while a restrained approach has been applied to other locations to respect their existing built form and heritage.

Table 11.1 – Optimum net residential densities (dwellings per hectare)

	Core	Primary	Secondary	Periphery
Chatham	275	180	79	35
Strood	180	95	79	35
Gillingham	95	79	79	35
Rochester	95	95	79	35
Hoo St Werburgh	35 (50*)	35 (50*)	35 (50*)	35
Rainham	50	35	35	35

** Indicative for Development Strategy Scenarios 2 and 3 only*

Policy T2: Integrating Land Use and Transport Planning

The council promotes development which supports the use of sustainable transport.

It seeks to realise opportunities for making the best use of land, by promoting higher density mixed use development in areas within close walking distance of the main rail stations (Strood, Rochester, Chatham, Gillingham and Strood) and Chatham Waterfront bus interchange in line with the proposed levels set out at Table 11.1.

Proposals which compromise this policy will be resisted.

Question T2:

Do you agree/disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway?

Question T3:

Research has demonstrated the non-linear relationship between housing density and public transport use. However, in principle, do you agree/disagree that densification is more likely to increase the viability of additional and/or improved public transport services?

¹⁵⁶ Zones are aggregated 2011 Census Output Areas that best fit with walking isochrones

Question T4:

The optimum densities set out at Table 11.1 are likely to be achieved in the absence of this policy due to their central locations. Is it appropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs? For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare? Would it be appropriate to include Cuxton and Halling stations in Table 11.1?

Question T5:

What do you consider would represent a sound alternative approach towards the integration of land use and transport planning in Medway?

Strategic Transport Infrastructure

- 11.15 The vision and strategic objectives for the Local Plan aim to establish a regional profile for successful and ambitious growth, gain competitiveness, attract investment and secure and enhance the diverse business base in accessible locations.
- 11.16 Medway is working with neighbouring local authorities, transport bodies and government agencies in assessing and defining the need for improvements to transport networks, and seeking to secure investments to realise these improvements. The council is engaged with Highways England by sharing growth data and traffic modelling outputs in order to understand and plan for the proposed Lower Thames Crossing. In addition, the council has submitted an ambitious expression of interest bid in response to the government's Housing and Infrastructure Fund (HIF).
- 11.17 The HIF aims to support the preparation of Local Plans by unlocking land which would otherwise be unavailable for development due to a lack of infrastructure. The HIF Forward Funding stream is intended for strategic, high-impact infrastructure schemes, which could provide a significant proportion of upfront development costs, intended to create confidence and instigate further private and public sector funding. The development of a small rural town on the Hoo Peninsula and extended employment areas depend on strengthened connections and significant upgrades to transport. This was reflected in the HIF bid which identified road improvements and the reinstatement of passenger services. The council has included a development strategy option that responds to the specific opportunities that would arise from such strategic infrastructure investments.
- 11.18 The council received responses calling for the reinstatement of passenger rail services during previous consultations, while members of the public frequently raised the potential role of the line with planning officers at public exhibitions. The Kent Community Rail Partnership also supports a passenger rail connection for Hoo.
- 11.19 The principle of a rail upgrade to the Grain freight line providing for passenger services is supported throughout the council's policy framework, and the Medway 2035 regeneration strategy. A rail connection for passengers would not only relieve

local congestion; it would provide a focus for the community and bring about a step-change in travel behaviour. Moreover, it would:

- underpin a wider strategy in conjunction with exemplary approaches to design and green infrastructure;
- address negative perceptions, provide the means to create a higher value offer and make a significant contribution to an aspiring brand for the Hoo Peninsula and Medway; and
- serve an improved employment offer at Kingsnorth and allow for increased rail freight.

11.20 Following the withdrawal of passenger services in 1961, the Grain freight line continues to facilitate the import/export of aggregates, along with rail freight associated with the aviation fuel storage depot and Thamesport activity. However, the line is currently underutilised, prompting the council to emphasise its potential role in making the Hoo Peninsula a sustainable location for growth in response to Network Rail's recent consultation. Network Rail will highlight the potential of the Grain freight line in the forthcoming Kent Route Study, setting out investment options for the next 30 years.

11.21 Many commuters from the Hoo Peninsula currently drive from villages to stations at Strood, Gravesend or Ebbsfleet; with the scale of growth forecast, a continuation of this commuting pattern is not sustainable or desirable. This commuting adds to pressure on the A228 on the Hoo Peninsula, and congestion contributes to the air quality issues at the designated Area Quality Management Area at Four Elms Hill. Further analysis of commuting patterns is set out in the Transport technical paper supporting this consultation.

11.22 Successful HIF bids will receive access to funds to develop a business case in 2018. The prime location for a new rail station and any supporting infrastructure will need to be identified in a business case, along with the need to upgrade road and rail bridges. Train services will need to be compatible with freight activity, while Network Rail are considering the potential to extend an existing service from Gravesend, providing a direct service to London. A positive response from the government will help to ensure that the Hoo Peninsula is a sustainable location for growth.

11.23 The government has described its strategic vision for rail,¹⁵⁷ including commitments to expand the network to boost housing and economic growth, reinforce the importance of rail freight to support the economy and the environment and to explore opportunities to restore routes withdrawn during the 1960s and 1970s. The government is inviting new, innovative proposals based on a strong business case. This suggests that there will be further opportunities to seek government funding in the short to medium term if the HIF bid is unsuccessful.

¹⁵⁷ Department for Transport, *'Connecting people: A strategic vision for rail'*, (Nov 2017), Available at: <https://www.gov.uk/government/publications/a-strategic-vision-for-rail>

Policy T3: Hoo Peninsula rail connection

The council intends to safeguard land for new rail infrastructure, including a station, route alignment and buffer stop zone. Proposals which compromise this policy will be resisted.

Proposals which demonstrate consistency with the Hoo Development Framework and any subsequent masterplans will be encouraged.

The council will work with strategic transport bodies and wider partners to seek investment in providing new passenger rail services on the Hoo Peninsula.

Question T6:

Do you support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight?

The council welcomes responses indicating areas of land to be safeguarded. This information could be considered in a business case, subject to funding.

What alternative approaches would you suggest?

Aviation

11.24 A core principle of national policy is that planning should “proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.”¹⁵⁸ In order to deliver sustainable development, under the policy theme of economic growth, Local Plans should “plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.”¹⁵⁹ Under the policy theme of sustainable transport and specifically in relation to airports and airfields, the government requires plans to “take account of their growth and role in serving business, leisure, training and emergency service needs.”¹⁶⁰

11.25 The government consulted on a new UK Aviation Strategy in 2017 to help shape the long-future of the sector.¹⁶¹ The new strategy will focus on economic growth, regional connectivity and skills. There will be further rounds of consultation in 2018, with the final strategy expected to be published by the end of 2018.

¹⁵⁸ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Paragraph 17, pg.5, 2015 Available at:

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

¹⁵⁹ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 1, Paragraph 21, pg.6, 2015 Available at:

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

¹⁶⁰ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 4, Paragraph 33, pg.10, 2015 Available at:

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

¹⁶¹ Department for Transport, ‘*Government sets out vision for future of UK aviation*’, July 2017, Available at: <https://www.gov.uk/government/news/government-sets-out-vision-for-future-of-uk-aviation>

- 11.26 Rochester Airport is a general aviation facility catering for leisure, business, training, heritage and emergency service uses. It requires investment to secure its medium to long-term future. The Council Plan (2016-21) highlights the role of Rochester Airport in creating a strong, diversified economy with job opportunities for Medway residents. The council approved the Rochester Airport Masterplan in January 2014¹⁶² to provide a strategic gateway and an economic hub.
- 11.27 The masterplan proposes to remove one of the two grass runways and construct a new hard-surfaced runway with improved facilities, while the adjoining land will capitalise on opportunities to create skilled employment opportunities as part of its Enterprise Zone status within the North Kent Innovation Zone. There are no plans to transform the facility into a commercial airport, with regular scheduled and/or chartered passenger flights, and the operations will be subject to conditions to mitigate and manage impacts on the environment and amenity.
- 11.28 There is a small aviation operation at Stoke on the Hoo Peninsula. The Stoke facility, which primarily caters for microlights, is limited in scale and constrained by high voltage power lines and other features. It is not proposed to safeguard this facility.

Policy T4: Rochester Airport

Rochester Airport will be safeguarded to provide an enhanced aviation facility for business, public service, training, heritage and leisure uses, and support the development of a strategic gateway and an economic hub.

Proposals will need to demonstrate how any impacts will be mitigated, including air quality, noise, traffic, and amenity.

Question T7:

Do you agree with the proposed policy for aviation in Medway?

What alternative approach would you propose for planning policy for aviation in Medway?

Riverside Infrastructure

- 11.29 The River Medway is a key asset, providing a strong sense of place and identity. It is highly visible from some areas, particularly from public areas of the waterfront and areas of higher ground. However, in some areas it is less accessible due to historic military and industrial uses. Historically the river has played a functional role in the transportation of goods to wharves, reflecting the area's manufacturing and industrial heritage. Some of this activity continues today, such as on the Medway City Industrial

¹⁶² Medway Council, 'Rochester Airport', (ME DWAY.GOV.UK), Available at: <http://www.medway.gov.uk/businessandinvestment/medwayregeneration/rochesterairport.aspx>

Estate. The waterfront areas are characterised by the infrastructure associated with a range of economic activities, from aggregates importation to marine engineering and leisure activities. The river represents an important transport corridor for commercial and leisure traffic.

- 11.30 National planning policy requires Local Plans to “support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.”¹⁶³ In addition, national policy requires Local Plans to safeguard existing, planning and potential infrastructure, including wharfage, for the transport of minerals, including recycled, secondary and marine-dredged materials.¹⁶⁴ However, national policy also stipulates that plans should “avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”¹⁶⁵
- 11.31 The 2015 North Kent Strategic Housing & Economic Needs Assessment (SHENA) highlighted the regional connections through road, rail and waterfront logistics sites as influential factors in business location and the labour market.¹⁶⁶ Furthermore, the SHENA found that energy and water industries are relatively strong in Medway compared to local, regional and national comparators.¹⁶⁷ A response to the last consultation suggested that the policy approach for economic development places too much emphasis on ‘higher value employment’, however this should not overlook some of Medway’s existing strengths, such as manufacturing and opportunities for port and wharf related activities. The Employment Land Needs Assessment (ELNA), commissioned as part of the SHENA, noted that Medway has significant space for

¹⁶³ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 1, Paragraph 21, pg.6, 2015 Available at:

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

¹⁶⁴ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 13, Paragraph 143, pg.32, 2015 Available at:

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

¹⁶⁵ Department for Communities and Local Government, ‘*National Planning Policy Framework*’, Section 1, Paragraph 22, pg.7, 2015 Available at:

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

¹⁶⁶ Gravesham Borough Council and Medway Council, ‘*North Kent Strategic Housing and Economic Needs Assessment*’, para 5.1, March 2015, Available at:

<http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf>

¹⁶⁷ Gravesham Borough Council and Medway Council, ‘*North Kent Strategic Housing and Economic Needs Assessment*’, para 5.10, March 2015, Available at:

<http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf>

businesses reliant on available wharfage sites.¹⁶⁸ Some existing units located on Medway City Estate – one of the largest employment centres in Medway – benefit from active wharfs¹⁶⁹, understood to involve the importation of timber. The ELNA recommended that the ‘Medway City Peninsula – Wharf/Specialist industry use’ should be protected and maintained, along with vacant land at Kingsnorth and Isle of Grain with potential for wharf users.¹⁷⁰ The ELNA also provided advice concerning the future of the Chatham Docks site.

11.32 The predominant stock quality of the Chatham Docks site was considered mixed or good, currently in B-class use for construction, marine, engineering, materials processing, warehousing and storage activities.¹⁷¹ The ELNA considered that there are a range of possibilities to increase employment capacity on this site, which were at the time of the survey either vacant or underutilised.¹⁷² The facility is understood to cater for smaller vessels and this may continue to complement larger ports and handle vessels too large for other local facilities. Chatham Docks forms part of the Peel Ports’ London Medway cluster, along with the Sheerness Port.¹⁷³ In response to the last consultation, Peel Ports highlighted the promotion and implementation of a 20-year masterplan with substantial investment for Sheerness Port and that this is considered to adequately serve businesses in Medway. The response stated that “the emerging plan should therefore not seek to safeguard the future of Chatham Dock as employment land or an operational commercial port facility.”

11.33 Peel Ports have also responded to the Strategic Land Availability Assessment (SLAA), indicating that the Chatham Docks site has a potential capacity of 2,577 new homes, likely to be flatted development. This has been incorporated as a potential site allocation (phased later in the plan period), given the regeneration agenda and the presence of St Mary’s Island to the west and development under construction to

¹⁶⁸ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 6.8, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁶⁹ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 7.22., December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷⁰ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, Table 27, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷¹ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 7.4 and 7.12, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷² GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 7.17, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷³ Peel Ports Group, ‘The quay to international trade’, available at: <https://www.peelports.com/ports/london-medway>

the east. The redevelopment of the remainder of Chatham Docks would provide an opportunity for a continuous riverside path and this is considered to be central to the vision and strategic objectives of the new Local Plan. However, a key finding of the SHENA noted that the private market is dominated by homes aimed at smaller households, including newer waterfront flats.¹⁷⁴ These house types should be directed to the core accessibility zones in the first instance, given that the Chatham Docks site is peripheral and likely to be car dependent, unless significant transport upgrades are introduced. The scale of such proposed growth would justify such transport improvements. The exact recommendations of the SHENA and ELNA are unlikely to be compatible with a residential led, mixed use development. It is however conceivable that the Chatham Docks site can potentially deliver on multiple, rather than competing, elements of the vision and strategic objectives.

11.34 The new Local Plan should not overlook the potential for innovative approaches to these land uses to emerge in future, such as multi-storey warehouses¹⁷⁵, while the disused line to Gillingham station could provide a bespoke sustainable transport solution. It is considered that the potential site allocation should be regularly reviewed in line with national planning policy.

11.35 A network of piers, jetties, slipways, steps and stairs are interspersed along the urban stretches of the river, although some facilities are in a poor state of repair. The council supports the potential for new services on the river to complement the regeneration and tourist attractions along the waterfront, therefore the retention of and access to wharves and public piers will be promoted. However these need to meet the requirements of conserving the important environmental features of the designated river and estuarine habitats. The introduction of a new river crossing could facilitate sustainable transport and address the restrictions that apply to pedestrians and cyclists who are unable to use the Medway Tunnel, as well as meeting regeneration ambitions.

Policy T5: Riverside Infrastructure

This policy intends to reinforce Medway's strategic location in the Thames Gateway. Ports and wharfage will be safeguarded in order to support existing business sectors and to attract businesses requiring such facilities.

The allocation of Chatham Docks for mixed use development will be regularly reviewed, taking account of market signals and development needs. Innovative, mixed use proposals for this strategic site will be encouraged. The Council will require bespoke sustainable transport solutions, including the assessment of the re-use of the disused line from the docks as a link to Gillingham station.

¹⁷⁴ Gravesham Borough Council and Medway Council, 'North Kent Strategic Housing and Economic Needs Assessment', para 4.54, March 2015, Available at:

<http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf>

¹⁷⁵ The Financial Times, <https://www.ft.com/content/26036984-e7cd-11e6-893c-082c54a7f539>

Riverside infrastructure associated with the transport of minerals, waste and other defined materials will be safeguarded in accordance with national planning policy.

The existing network of piers, jetties, slipways, steps and stairs will be safeguarded to support the potential for visitor and river taxi services and to accommodate visiting vessels, while any new facilities will be encouraged.

Riverside infrastructure will be required to comply with the requirements of conserving the designated environmental features of the estuaries and river. Development must demonstrate that there will be no loss of protected or priority habitats or species, unless the impacts are not significant at a waterbody scale, and can be adequately mitigated for.

Question T8:

Do you agree with the proposed policy for riverside infrastructure in Medway?

Question T9:

Do you consider the flexible approach to Chatham Docks to be appropriate?

Question T10:

What alternative approach would you propose for planning policy for riverside infrastructure in Medway?

Riverside Path

- 11.36 The River Medway is a defining feature of the area, providing a strong sense of place and identity. The local character of the river and its edges varies along its length, from extensive areas of intertidal habitat to historic military uses and industrial facilities. A series of spectacular meanders, framed by steep escarpments, create the opportunity for stunning views and connections between the urban quarters. It also provides opportunities for sport and recreation, however access is restricted in some areas due to historic military and industrial uses, and environmental constraints.
- 11.37 Responses to previous consultation on the emerging Local Plan generally supported the proposed vision which highlights the river itself and its strategic role. A strong emphasis on the river can help to deliver multiple elements of the vision, strategic objectives and wider policy outcomes.
- 11.38 The urban waterfront is a focus of the regeneration agenda and the delivery of quality public spaces. A riverside path or boardwalk will establish new infrastructure that inspires place-making and how people move around the area. A defined route would be a draw for residents and visitors, linking key heritage sites, stations with town centres, the Universities and work places, supporting healthier lifestyles and cultural activities. It would be a focus for quality public spaces in shaping the modern waterfront city. The highest quality place-making standards will be realised along the urban waterfront, with public spaces as focal points, and increased access to the

riverside and the river itself. Where appropriate, this will align with the route of the England Coastal Path that runs along Medway's frontage with the river and estuaries.

Policy T6 – Medway Riverside Path

The council intends to maximise the potential of the River Medway and its edges as a strategic priority.

Waterfront development proposals will incorporate public space to facilitate walking and cycling and demonstrate the highest design standards, including Sport England's Active Design guidance.

Proposals will need to demonstrate how any impacts will be mitigated.

Question T11:

Do you agree with the proposed policy for a riverside path in Medway?

What alternative approach would you propose for planning policy in Medway?

Marinas and moorings

11.39 Marine leisure activities primarily consist of yachting and motor boating facilities along the middle and upper reaches of the river, largely away from conflict with the commercial activities elsewhere. A marina is a dock or basin with moorings and supplies for yachts and small boats. It can include activities such as boat sales, repair facilities, chandlery, boat storage, club house and parking. It is effectively a small port that is used for pleasure rather than trade, often with hotels, restaurants and bars ancillary to the main function. Marinas therefore have a very urban appearance and will generate a significant amount of vehicular movement, which could lead to traffic congestion. Rural areas are therefore not preferred locations for marinas. Within or adjoining an existing built-up area, however, a marina can, if well designed, be a positive asset. Where existing or historical facilities are located in smaller settlements or rural areas it may be appropriate to support the development of larger or more permanent marina facilities in the context of this policy.

11.40 Existing marinas operate at or close to full capacity. Facilities for visiting vessels are currently limited, but there is significant potential for growth. It is recognised that better co-ordination between marina operators would improve Medway's leisure boating offer. Evidence at the South East regional level indicates that there is a shortfall of marina provision along the North Kent coast between Ramsgate harbour and facilities around the Medway Estuary.

11.41 Therefore, proposals for upgraded or new high quality marina facilities and amenities will be supported where there will be no adverse environmental impacts. In particular, river access to shore facilities and attractions requires improvement.

- 11.42 Moorings can have a negative impact on the landscape of the waterway. Urban locations, marinas and sites used historically for the function would be appropriate for permanent moorings. In other areas recreational boat users require short stay or overnight moorings necessitating only mooring posts and public footpath access in order to limit the impact on the waterways and natural and marine environment. The development of moorings, other than overnight stays, will be judged on their merits, having regard to their impact on the landscape, access, parking and cumulative provision.
- 11.43 Residential houseboat moorings occupy areas that could be utilised for additional marina berthing. Many of the houseboats have limited facilities and can create negative environmental impacts. This is considered in the Housing section.

Policy T7: Marinas and moorings

Proposals for marinas and permanent moorings will be permitted where:

- It will meet a proven need
- In an urban location, it is supported by the provision of other commercial leisure uses at an appropriate scale without undermining the role of centres and their vitality and vibrancy
- Required for the proper functioning of an existing facility or to enhance and improve access to the waterway
- Will not have a significant adverse impact on transport network
- Will not result in increased flood risk further downstream or elsewhere
- Will not conflict with neighbouring uses, have a significant adverse impact or result in unacceptable environment consequences. A detailed HRA may be required.
- Provision of access, servicing and car parking is made in a form that will not adversely impact on amenity particularly with regard to the waterways
- The site has adequate land-based utility infrastructure and support facilities including sewage, waste, water, secure storage and washing

Proposals will be required to demonstrate careful consideration with regard to the Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest and the Marine Conservation Zone. Developments will need to adhere to the council's policy for the North Kent Strategic Access Management and Monitoring Scheme.

Question T12:

Do you agree with the proposed policy for marinas and moorings in Medway?

What alternative approach would you propose?

Urban Logistics

- 11.44 Wider changes in retailing and logistics have created a new demand for industrial land in urban areas. Products ordered online are rarely delivered from the central warehouse to customers' doors; they need to be consolidated before the 'last mile' delivery is completed by couriers. However, the pressure to deliver housing has reportedly resulted in significant losses of industrial land across the country. Research estimates that Britain and Ireland need five times more new logistics space

each year than what is being built.¹⁷⁶ New approaches to warehousing are also emerging.

- 11.45 The SHENA highlighted the rising demand for logistics space in the Thames Estuary Corridor. As one of the largest conurbations in the South East, in Medway is reportedly an area of significant interest for logistics operators given the large population and manufacturing sector requiring distribution.¹⁷⁷ However, the SHENA noted that Medway has underperformed in this sector, with areas either side of the Dartford Crossing traditionally more attractive, in part due to the lower suitability and availability of sites.¹⁷⁸ However, the sector has seen recent expansion with new activity, such as London Medway Commercial Park, a major new facility at Kingsnorth. Furthermore, the proposed Lower Thames Crossing is likely to increase demand for sites in Medway, creating new employment opportunities.¹⁷⁹¹⁸⁰ This is despite the latest Medway Authority Monitoring Report revealing a net loss of 3,395 sq m storage and distribution (B8) floorspace,¹⁸¹ in line with the national trend.
- 11.46 These structural changes to economic sectors and the way areas need to function present new challenges for local planning policy. It is nonetheless a national requirement that Local Plans should “proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.”¹⁸² The potential for increased use of modular construction offers opportunities for related factories in Medway. Areas such as expanded employment land near Kingsnorth could provide suitable sites from which to service the local housebuilding industry and minimise the impact on the national, regional and local highway network.
- 11.47 The logistics sector is likely to prefer sites in close proximity to main roads, providing convenient and economic access to urban areas. Such locations are more likely to support the use of low emission vehicles due to their limited range and this would

¹⁷⁶ Colliers International, quoted in The Planner (February 2018)

¹⁷⁷ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 2.62, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷⁸ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 2.63, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁷⁹ GVA, ‘North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway’, para 2.65, December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

¹⁸⁰ Gravesham Borough Council and Medway Council, ‘North Kent Strategic Housing and Economic Needs Assessment’, para 5.109, March 2015, Available at: <http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf>

¹⁸¹ Medway Council, ‘Medway Authority Monitoring Report 2016-17’, Vol. 1, p.28, Available at: <http://www.medway.gov.uk/pdf/Vol1AMR2017FINAL.pdf>

¹⁸² Department for Communities and Local Government, ‘National Planning Policy Framework’, Paragraph 17, pg.5, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

help to address poor air quality in central areas. As part of this consultation, the council is inviting responses concerning the potential allocation of new sites for storage and distribution. Responses will be considered in accordance with national planning policy and guidance.

Policy T8: Urban Logistics

This policy will support the logistics sector to develop in Medway and encourage efficient courier distribution, likely to be a significant source of local traffic congestion.

The loss of existing B8 (storage or distribution) uses will be resisted, unless it can be demonstrated that the site is no longer suitable for this activity, for example due to amenity issues.

This policy only applies to premises under 500 sq m if and when temporary permitted development rights are removed under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the change of use to B1 business and C3 residential use.

Question T13:

Do you agree with the proposed policy for planning for logistics in Medway?

This is believed to be the first local planning policy of its kind. It has been prepared in response to recent sector articles calling for planning policy interventions. The council would welcome responses to refine or develop an alternative policy to support the growth of this sector in Medway.

What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?

Connectivity and Permeability

11.48 The vision for Medway emphasises connections through effective transport networks, while the strategic objectives underline the role of design to deliver an accessible city where people can move around safely. These are also important elements of the Medway policy framework.

11.49 The government recognises the role of the planning system in “*facilitating social interaction and creating healthy, inclusive communities.*”¹⁸³ Local planning policies are expected to aim for places which promote “*opportunities for meetings between members of the community who might not otherwise come into contact with each other ...*” and “safe and accessible developments, containing clear and legible

¹⁸³ Department for Communities and Local Government, ‘National Planning Policy Framework’, Section 8, Paragraph 69, pg.17, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.”¹⁸⁴

- 11.50 The multiple benefits of walking and cycling for individuals and the community are well documented and promoted, for example through the Living Streets campaign, not least in terms of addressing various public health, environmental and economic issues as a result of traffic congestion.¹⁸⁵ Research suggests the lack of attractive routes and perceptions of crime are factors that deter walking.¹⁸⁶ The same is likely to apply to cycling.
- 11.51 Individual and household travel choices are complex; however certain forms of street layout are more likely to facilitate walking and cycling. The diagrams below compare forms of development which are more conducive to driving (A) and walking and cycling (B).

Figure 11.2 - Car dependent (A) versus walkable street layouts (B)



Source: CLG and DfT, *Manual for Streets* (2007)

- 11.52 Moreover, networks of multi-functional green spaces, along with increased riverside access and river crossings and the conversion of disused infrastructure will have a crucial role in making locations sustainable.
- 11.53 Due to the way in which development will be built out over time, it is crucial that proposals demonstrate careful consideration of every opportunity for connections to integrate with adjacent areas, whether existing or likely to come forward in future. ‘Filtered permeability’, or the separation of vehicle traffic from other favourable routes

¹⁸⁴ *ibid* 183

¹⁸⁵ Living Streets, ‘*Making the Case for Investment in the Walking Environment*’, Available at, <https://www.livingstreets.org.uk/media/1392/making-the-case-summary-final.pdf>

¹⁸⁶ The Guardian, ‘*Unhealthy Britain: half of adults walk less than a mile a day – survey*’, (GUARDIAN.CO.UK), <https://www.theguardian.com/society/2017/may/26/unhealthy-britain-half-of-adults-walk-less-than-a-mile-a-day-survey>,

for public transport, walking and cycling, may offer an appropriate solution in some circumstances.

- 11.54 These principles are also important factors for specific groups. For example, a legible environment, incorporating hierarchy of street types, including short and narrow streets, has been emphasised in urban design guidance to help people living with dementia to lead an active and independent life for longer.¹⁸⁷

Policy T9: Connectivity and Permeability

Proposals must demonstrate how the street layout will promote connectivity and permeability.

Masterplans and/or Design and Access Statements must demonstrate how the proposed street layout will promote ease of movement along safe routes and integrate with adjacent built-up areas. The external connectivity and internal permeability of new development proposals will require careful consideration. Development will be expected to be integrated with the public realm and public transport, in particular ensuring that local facilities and services are easily accessible by foot or bicycle.

The council will seek to expand the network of safe pedestrian and cycle routes to ensure that areas dedicated to vehicular circulation are designed with pedestrian safety and needs of vulnerable groups in mind.

Proposals which highlight design features for vulnerable groups will be encouraged.

Question T14:

Do you agree with the proposed policy for connectivity and permeability in Medway?

What alternative approach would you propose for planning for connectivity in Medway?

Vehicle parking

- 11.55 The Council's current Parking Standards (second edition, adopted 2004)¹⁸⁸ sets out the non-residential parking requirements according to the proposed floorspace of new development. Revised residential car parking standards were issued in 2010. The minimum number of spaces required increases in relation to the number of bedrooms per dwelling. Reductions in the number of parking spaces are considered in urban areas with access to public transport.

- 11.56 National policy (NPPF paragraph 39) requires local planning authorities to consider a number of factors, such as access to public transport, if setting local parking

¹⁸⁷ RTPI- Mediation of space-making of place, 'Dementia and Town Planning- Creating better environments for people living with dementia', Jan 2017 Available at, http://www.rtpi.org.uk/media/2213533/dementia_and_town_planning_final.compressed.pdf

¹⁸⁸ Medway Council, 'Parking Service Standards', Available at: <http://www.medway.gov.uk/parkingandtransport/parkingservicestandards.aspx>

standards. However, this has been qualified by a written statement to Parliament, dated March 2015, which referred to the Government's revised, market-led approach to determine if additional parking spaces should be provided, having abolished maximum parking standards in 2011. The following text supplements paragraph 39 of the NPPF:

"Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network."

- 11.57 The council's new strategic transport model and wider evidence base will demonstrate where it is necessary to manage the local road network.
- 11.58 It is recognised that a reduction in the number of parking spaces may present an appropriate measure for some schemes as part of a wider strategy and to promote sustainable transport. The council is exploring the alternative approaches to car parking provision in some circumstances, such as high density development in close proximity to train stations. The final approach would provide a robust basis for any revisions to the current Parking Standards.
- 11.59 Along with the overall quantity, it is important to consider where car parking is accommodated in relation to the home and the street. It is generally accepted that the most desirable streets are dominated by lined trees with cars parked in the street, either parallel to the pavement or at an angle, providing a buffer for pedestrians. In contrast, cars often dominate the street scene of cul-de-sacs developed since the 1960s.
- 11.60 More recently, car parking is often placed to the rear of houses in parking courts. Parking courts are designed with the intention to reduce the visual impact of cars, maintain the overall required number of parking spaces and enable the free movement of vehicles. The streets in such developments are often relatively narrow to reduce construction costs. However drivers often choose to park on the street in front of houses, where there may be better surveillance. This can lead to instances of vehicles parking with two wheels on the pavement and impacting on the public realm and pedestrian safety.
- 11.61 There are further disadvantages to parking courts, including the inefficient use of land to accommodate parking, smaller rear gardens, lack of surveillance and residents preferring to use their rear door, resulting in a loss of street activity. 'Home zones' have been advocated to encourage more street activity through the integration of play, socialising and car parking. Such designs often incorporate traffic calming measures, signage, public seating, planting and street surfacing to promote uses in addition to vehicle movement.
- 11.62 Research indicates that the allocation of parking spaces can be inefficient.¹⁸⁹ Car ownership depends on dwelling type and tenure, therefore the allocation of most

¹⁸⁹ English Partnerships, 'The National Regeneration, Quoted in English Partnerships, 'Car Parking: What Works Where' (2006), Available at: https://www.ipswich.gov.uk/sites/default/files/ncd42_-_car_parking_what_works_where.pdf

parking spaces will inevitably lead to households with too few or too many spaces. Visitors are more likely to require parking during the evening and at the weekend. There are times when demand for visitor parking coincides with the highest demand for residents' parking, such as evenings. At such times, there may be insufficient capacity and result in pressures on spaces and incidences of inappropriate parking.

- 11.63 Furthermore, in addition to a private car, some households may also need to park a commercial van. Some parking spaces may not be designed to accommodate larger vehicles and this can also lead to dangerous parking practices.
- 11.64 Car club membership is seen as a measure to significantly reduce car parking provision. Residents have access to discounted car hire, which can be secured through planning condition. This can be practical where residents rely on public transport for commuting, but require a car for occasional and affordable use.
- 11.65 It is recognised that there is no single solution to vehicle parking provision; developments are likely to use a combination of measures, depending on residential density, proximity to public transport and market conditions.

Policy T10: Vehicle Parking

Planning applications for residential and non-residential development will be determined in accordance with the adopted Parking Standards.

For predominantly residential development, Design and Access Statements must demonstrate how vehicle parking adheres to the following design principles:

- formal parking bays as part of the carriageway, indicated by clear road markings or surfacing
- access to vehicles should be from the front of the property
- avoid parking within the front curtilage of the property where appropriate
- well surveyed
- planting to soften the impact of vehicles
- establish 'home zones' where appropriate
- accommodate parking for larger, commercial vehicles
- accommodate parking for Blue Badge holders in suitable locations
- accommodate dedicated spaces for car club membership where appropriate
- accommodate electric and other ultra-low emission vehicle parking

In line with national policy and guidance, the council will seek opportunities to improve the quality and, where appropriate, the quantity of parking in town centres. In addition, the strategic management of public car parking, as set out in the LTP, will support the vitality of town centres.

Cycle parking and storage

- 11.66 Cycling is recognised for the contribution it can make as a sustainable and healthy form of transport for trips within our towns and between rural communities. To support this, the council is committed to providing measures that make the choice to cycle a more natural one. The cycle network and associated infrastructure, including cycle parking, are essential to encourage cycling as a viable means of transport.
- 11.67 In the case of new developments and re-developments, good quality cycle parking should be designed in from the outset and not introduced as an afterthought. Cycle parking must be easy to use and accessed by all members of the community at all life stages and the need to lift or drag the bicycle at any time should be designed out of all new parking layouts.
- 11.68 Cycle parking should always give cyclists the confidence that their bicycle will still be there upon their return and therefore, racks or other support systems should be conveniently sited and provide good security. Cycles are generally expensive goods. Parking and storage facilities that rely on the securing of wheels are unlikely to provide effective deterrents against theft or damage. It is much easier to remove cycle wheels without the need for tools. Cyclists are not likely to use communal cycle stores with limited security, and this could lead to storing cycles inside properties and/or on balconies, which can impact on amenity.

Policy T11: Cycle parking and storage

Development proposals will be expected to comply with the cycle parking standards in accordance with the council's adopted Parking Standards.

Long term cycle parking facilities for residents, visitors and/or employees of the development must be conveniently located; safe to use; secure; weatherproof; and be well integrated into the building and/or layout of the site.

Short term cycle parking facilities should be conveniently located in relation to the public realm, provide effective security for cycles and be safe to use.

For dwelling houses, individual provision should be made within the private garden area. For flatted developments and commercial uses, communal cycle stores should be provided in individual cages or containers, in very secure locations where access is restricted to residents. In the event that internal space constraints mitigate against providing on-site provision, the Council may seek contributions from the developer towards secure on-street residential parking or maintenance of strategic cycle routes throughout the Borough; where appropriate.

Managing the transport impact of development

- 11.69 The integration of land use and transport is a key element of sustainable development. The NPPF recognises that developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The council uses its influence as a highway and traffic authority to promote public transport, walking and cycling as alternatives to the private car, so that development is easily accessible by a range of transport options.
- 11.70 New developments or intensification of existing uses can have a detrimental effect on the transport network by generating additional traffic or by placing additional burden on public transport. In addition, vehicular access should not cause a road safety hazard or delays to other road users. This draft policy would therefore be in general conformity to the NPPF, which states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 11.71 The council expects proposals that will generate a significant amount of movement to be supported by a Transport Assessment (TA). The council has adopted guidance¹⁹⁰ for TAs which promotes the use of its new traffic model, recently validated by Highways England. The potential advantages may result in a more efficient planning process, leading to increased confidence, reduced costs and higher quality developments. This will also help to ensure that the council can effectively plan for growth.
- 11.72 Travel Plans will be required for residential developments and workplaces above a specified threshold. A Travel Plan should set out measures that a proposed over the longer term that will be taken to give rise to the use of more sustainable modes of transport.
- 11.73 The need for TAs and Travel Plans for mixed use developments, where individual uses fall below the threshold, will be assessed on a case-by-case basis. The measures set out in Travel Plans should be put in place as early as possible with a new development, so that people can benefit from a choice of transport, and develop sustainable travel patterns.
- 11.74 The council has guidance for the construction of vehicular access from the highway and crossovers (dropped kerbs) will not be permitted in areas where they would cause a road safety hazard.

¹⁹⁰ Medway Council, 'Transport Assessments Guidance Note', January 2018, http://www.medway.gov.uk/pdf/Guidance%20Note_Transport%20Assessments_v11.pdf

Policy T12: Managing the transport impact of development

Transport Assessments

The council expects proposals that will generate a significant amount of movement to be supported by a Transport Assessment.

Applicants are encouraged to refer to the adopted Guidance Note for Transport Assessments.

Travel Plans

Travel Plans will also be required for developments above threshold sizes, specified by the council.

Vehicular Crossovers

Developments, including those that require new or additional crossovers, will need to demonstrate that the proposal would not cause a road safety hazard to vehicle occupants, cyclists and pedestrians.

Question T15:

Do you agree with the proposed policy approaches for managing the transport impacts of development and provision for parking?

There may be opportunities to secure a ‘dockless’ bike sharing scheme in Medway, however this is likely to be initiated by the market. This may be appropriate for specific routes, such as to/from Chatham rail station and the university campuses. Would it be prudent to seek to manage this through planning policy?

What alternative approaches would you propose for policy in the new Medway Local Plan?

From: [REDACTED]
Sent: 17 June 2018 00:04
To: [REDACTED]
Subject: Fw: Local Plan 2035 - Joint Comments from Cllr Roy Freshwater and Councillor Mick Pendergast, Peninsula Ward

Local Plan 2035 - Joint Comments from Cllr Roy Freshwater and Councillor Mick Pendergast, Peninsula Ward

All the Local Plan 2035 development proposals for the Peninsula are considered unsound and do not address the sustainability and essential service needs for Peninsula communities

All the Local Plan 2035 consultation document relating to development scenarios 1 to 4 are all considered to be unsound in respect growth plans for the Peninsula as proposals concentrate and focus on the building of 37,143 new homes by housing developers without objectively assessing the development and infrastructure needs of the people living on the Peninsula or additional residents for approximately 14,000 new homes to be built mainly Peninsula green field.

Residents do not see the Local Plan sufficiently gathering any evidence by Medway Council or carrying out of any sustainability appraisal of additional services to meet the needs of the existing community and substantial expansion of services needed for new residents. The Local Plan talks about opportunities for new infrastructure but residents feel that major infrastructure improvements needed, such new roads, schools, health services including addition GP, parks, additional services and specialist housing for the ageing populations, discussion on a country park at Deangate and other important infrastructure needs should be listed in the Local Plan consultation document. This will give existing residents confidence that Medway Council will not continue (as happens at the moment) to squashed new residents in existing communities without putting in place additional services or necessary infrastructure and continue to make lives worse for local residents.

Local Plan Development proposals will make lives worst for local residents of Hoo St Werburgh Village and all villages on the Peninsula

The majority of Peninsula residents have lost trust in Medway Council and feel that new houses will not be met with the appropriate upgrade of critical and sustainable development and infrastructure. Residents have many current examples where new developments are taking away essential services from the existing residents as a result of new developments where Medway Council has made no provision at all for essential and additional services needed to meet the essential service needs of additional residents. It is felt Medway Council is just continuing to take and take from local communities and is giving nothing back and history of previous approvals where statements 'subject to sufficient 106 monies being available

'really means that no assessment of any real infrastructure improvements are untaken and reported to the Planning Committee needed to make developments sustainable. Section 106 monies are not sufficient to meet the cost of necessary levels of new infrastructure to meet the needs and expectations of new residents.

Local Plan Housing Developments proposals will be aking lives worst for all people living on the Peninsula

All the proposal set out in the Local Plan 2035 consultation document will substantially make many lives worse for people living on the Peninsula. The Local Plan 1 and 2 scenarios are proposing in excess of 15,000 new homes and residents have lost trust in Medway Council delivering substantial new infrastructure - residents need to see a list of new infrastructure investments **before** new housing developments involving thousands of new houses are approved - as stated in the Local Plan 2035 new housing and proposals for turning Hoo Village into a town against the wishes of the majority of local residents 'is dependent on new infrastructure and services'.

The Peninsula communities have lost trust with Medway Council as more than 2,000 new homes have already been built on the Hoo Peninsula or given planning approval by Medway Council bringing 7,000 new residents to live on the Peninsula. No real infrastructure investment has been made by Medway Council and no sustainability appraisal was undertaken to ensure services were expanded before the houses were built to meet the needs of new residents. Additionally, two large developments - Wimpey Taylor and Chatterden of over 1,000 new homes will in all probability be approved by Medway Council before the local plan is approved and bring over 3,000 additional people living on the Hoo Peninsula. Substantial and necessary infrastructure improvement and additional services should have already been agreed with local communities. But minimal additional infrastructure, if any, will in real terms be put in place for over 7,000 new people. - section 106 monies will be insufficient to pay for even minimal new services and infrastructure improvements There are no proposals in the Local Plan 2035 for NEW ROADS, HEALTHCARE OR GP SERVICES, NEW SCHOOLS, CHILDREN AND ADULT SOCIAL CARE, SPECIAL MENTAL HEALTH SERVICES, AGEING CARE AND SUPPORT SERVICES, RESIDENTIAL CARE AND END OF LIFE CARE SERVICES HAVE NO BEEN PUT IN PLACE TO MEET THE NEEDS OF THESE ADDITIONAL RESIDENTS, ADDITIONAL PUBLIC TRANSPORT REQUIREMENT.

Local Plan 2035 - Essential health services and health infrastructure extended to meet the additional needs of new residents

Although the number of GP providing services on the Peninsula has not changed, the substantial number of new residents occupying new house is reducing GP services. There is real concern that such declining and substantial reduction of GP's services is already causing and substantially increasing serious health risk to communities, particularly in rural areas. GP's services have also high inputs into many of the health services run by the Council as listed below.

(a) increasing GP services are needed for senior citizens where the number aged 70 years and over will rise by over 20% in next five years. Medway Council needs CCG to provide supporting evidence base documents identify how many additional GP's will be needed, in 5 years, in 10 years etc to meet the health needs of the expanding population. The Council makes it clear that without transparent and evidence-based documents it would be wrong for the Council to give planning permission for new housing knowing that such decisions are making the health care services for existing residence worse and not being able to provide proper health care services or meet expectations of new residents - and any such Planning permission would appear to be contrary to Health and Social Care legislation which requires the Council to improve the health of their local population.

(b) already rural GP shortages indicate that primary care needs and social and adult care needs involving

home visits may not be fully met at moment and will rise by 20% in the next 5 years in line with an ageing population.

(c) increasing home care services to release hospital beds and allow people to live independent lives will involve increasing numbers of GP home visits and a substantial increase in social and home care services administered by the Council.

(d) increasing GP services needed to meet needs for increasing sexual health services and drug and alcohol misuse. London drug gangs targeting Medway.

(e) One in Four people in Medway has a mental health problem - service currently underfunded with stories of many patients being turned away despite being in desperate need or are not yet reported as suicidal. That Mental health services are being increased in line with projected population increases in the Local Plan. That urgent consideration be given in the Local Plan to provide local mental health services to prevent the current long and unacceptable journeys of relatives wishing to visit relatives.

(f) Pressures in secondary care - diagnostic test waiting list targets have not been achieved since May 2015

(g) The number of urgent operations cancelled in Medway has more than trebled since 2015.

(h) Increasing air pollution and health problems - the local plan will bring in excess of 100,000 additional cars onto Medway Roads and the expanding commercial business areas will substantially increase pollution. Pollution under Air Quality Management Areas will increase health concerns of people under the new local plan and bring additional community health pressures problems. Road roundabout improvements to substantially reduce pollution approved 4 years ago - Four Elms, Sans Pareil and Medway Tunnel have not started!

(i) Increasing need for GP services for the increasing number of residential homes for the elderly to match the increasing Peninsula Medway ageing population - Medway Council has a legal responsibility to ensure sufficient residential home needs are met.

(j) Increasing childcare services in line with population increases.

Local Planning Inspectorate

Many local residents feel that the Local Planning Inspectorate should look at the soundness of the proposal relating to the Peninsula and take into account the history of decisions made by Medway Council - although the Council had difficult decision having regard to Planning law - the Council nevertheless has approved substantial housing developments for the whole of the Peninsula without proper regard on issues of sustainability and community needs for additional services needed for existing or new residents.

That current unsustainable developments set out in the Local Plan 2034 will not secure balanced growth or ongoing benefits for residents under scenarios 1 to 6. There is no mention of 'preferred approach' 'sustainability appraisal' - people believe that the majority of politicians of Medway Council who do not live on the Peninsula are sacrificing greenfields of the Peninsula to housing developers behind closed doors as an easy option to achieve government housing targets.

That unacceptable changes and harms are being forced onto Hoo Village residents and Peninsula village communities. The people living a rural lifestyle on the Peninsula believe that Medway Council local plan 2035 will just continue to squash more people into Hoo village and other villages on the Peninsula and that Medway Council has forgotten that the Local Plan 2035 relates to real people and real lives - there is no proper or real mention that the local plan for thousands of new homes on the Peninsula will force changes onto the communities substantially affect and change lives, health and lifestyles of all Peninsula residents.

There is also no mention in the local plan 2035 that proposals to deliver sustainable and quality developments have considered or been identifying or addressing any of the fundamental concerns listed below:- :

(a) No local shops or local service within reasonable walking distances: no proposals to address that most all new developments will mostly be beyond the reasonable walking distance from the main village of Hoo and other villages to necessary shop and services - practically all new residents will have to use cars and major concerns about ageing population, disabled and families with transport with no transport.

(b) High dependence on car travel is a significant factor but ignored in the Local Plan 2035: no proposals to address the significant harm which will result from the consequent high dependency on car travel - no reference to traffic surveys, increasing pollution - that existing small village roads cannot cope with the estimated additional 30,000 cars - **no reference to the need for new roads which should be in place before housing developments are approved by Medway Council.** Residents have no confidence that new essential roads will be built by Medway Council - surely the Local Plan should make mention that new roads will have to be built to cope with new substantial car numbers.

(c) New Roads needed - current high Levels of Pollution will substantially increase to dangerous levels because of substantial increases in cars, commercial vehicles and HGV. There is no reference in the Local Plan 2035 that residents have lost confidence in Medway Council delivering any necessary road improvement or new roads. Medway Council has failed in the past last 4 years to carry out urgent improvements to 4 Elms roundabout to reduce high levels of pollution. Estimated 30,000 additional cars will be using the important A228 Peninsula Highway artery road between the Isle of Grain and 4 Elms Roundabout - the only road, and dangerous road, in and out of the Peninsula, which is subject to high levels of car accidents that can close the road.

(d) Declaration of Four Elms Hill Air Quality Management Area - A228 There is no mention of local Plan 2035 to recognise and find solutions to residents concerns about ever-increasing levels of pollution from new housing developments. It would be fundamentally unacceptable if the Local Plan 2035 did not address and set down proposals for reducing pollution from estimated 30,000 cars from new housing developments having to use the A228 or estimated 400 additional cars/vans/HGVs undertaking return journeys each day using the A228 each from the new IKEA and Amazon distribution warehouses currently being built.

From: [REDACTED]
Sent: 26 June 2018 08:23
To: futuremedway
Subject: Future Medway Consultation - Retail Feedback
Categories: Blue Category

Dear Sir / Madam

At a Rochester town meeting on 22 June Prem Velayutham-Smith from Medway Council introduced the Future Medway document and asked for feedback. Prem summarised some shocking statistics regarding Rochester town centre. However, because the consultation period finished yesterday, it's unlikely that you'll have received much feedback from local businesses and stakeholders as not all are aware of the deadline? Was this deliberate? Why were local businesses not made aware of this consultation (and deadlines) through, for example, our annual business rates bill which was distributed in March?

Background to my views:

I've been a local resident since 2014. In 2008 I started a new retail business in Rochester High Street. I expanded the business in 2013 and this commitment continues because of my commercial lease. I employ local people. Because of the vagaries of the system, I am also one of the few retail businesses (excluding pubs, restaurants and cafes) to still pay 100% of the business rates in Rochester High Street, despite being a small business. As a bricks and mortar specialist shop, it's a priority to bring customers to Rochester to 1) buy my products and 2) learn new skills at workshops that we teach.

I'm also an active member of the Rochester City Centre Forum, have served on a working party to develop a new artisan market for the town and I'm currently the Forum's treasurer. The first aim of the Forum's constitution is,

"to strengthen the retail and leisure offer in Rochester town centre and to promote and market the town centre to attract visitors and customers, maximising footfall."

You can see I am passionate about the current state, and future development, of Rochester.

Concerns:

Ms Smith presented data from the additional retail and commercial assessment for Medway by GVA in March 2018. The bizarre results (to a very limited survey from a statistical point of view), suggested that Rochester has been designated as a heritage/tourist town, with a strong cafe/restaurant economy and that its specialist, independent shops are a complete irrelevance. I quote from page 14/15 of the assessment, with my comments (HT) following:

"Rochester does not have a particularly strong retail function for either food or non-food."

HT: That's interesting as we are one of the few non-clone towns in the south east where 50 business owners have retail shops. That is 50 *retail* shops, not including additional coffee shops, cafes, restaurants, healthy and beauty salons or charity shops. I do agree that we have a poor food offering.

"The most commonly visited non-food shop was Demelza."

HT: Really? Was your surveyor standing directly opposite this charity shop when asking the question? What a depressing statement. If this is true and Demelza is the flagship store for the town, perhaps Medway Council should charge Demelza 100% business rates and give Hometown an 80% discount on the rates it pays, as my company (and many others it would seem) are an irrelevance as they do not feature in the named stores in your survey. As a specialist shop, my company welcomes customers on a daily basis, that are making a specific visit to Rochester to see us, not just from the local area, but Kent, SE London etc. I would add that declining footfall is a major issue in Rochester High Street (like most High Streets).

"The most popular shops and services visited... were: bank/building societies (15%)."

HT: Again this shows the dangers of relying on statistics, seeing as the last high street bank (Lloyds) closed in April 2018. There are no building societies in the high street and since 2008 4 banks have closed - Barclays, HSBC, Natwest and Lloyds. There are now *no* external free cash points in the high street.

Conclusion:

As a local business owner, these are 3 of the most depressing statements that I have read regarding the status of Rochester and its high street. However, rather than throw in the towel and up sticks to another town, which is more supportive of independent businesses as an essential part of a thriving high street, now and in the future, can I make the following suggestions? These are relevant both in the short term and as a longer term strategy.

Ideas for the development of Rochester's daytime retail economy.

1. Trial free parking for a couple of hours say, 10-12 noon, Monday to Friday in the short term council car parks. This will increase footfall as the majority of shoppers (56%) travel by car. However, by limiting the time it will not affect the lunchtime restaurant trade or evening economy. Also by limiting it to short term car parks, it will not affect income from the long term commuter car parks.
2. Actively talk to one of the large supermarket companies to open a 'local' supermarket. The vacant Natwest site would provide an ideal location as there is a large car park behind for loading and the building is large enough for back office functions on the first floor or basement. Why not offer a rates incentive for their first year of trade? Alternatively, why not develop an indoor food market similar to The Goods Shed in Canterbury?
3. Actively talk to the challenger banks (Metro, Handelsbanken etc) regarding a financial outlet on the high street, so that there are free cash point facilities in the high street. Alternatively why not try and lure one of the building societies, Kent Reliance, Halifax or Nationwide from Strood town centre, again with a rates incentive? Considering the massive development at Rochester Riverside, we *have* to get a banking/building society presence back onto the high street.
4. Team up with some of the new companies such as www.appearhere.co.uk which are promoting short term, pop up lease opportunities for towns. This would be a solution for empty shops in the high street. Again this would enhance the speciality nature of Rochester and would emphasise the importance of visiting regularly to see what's new.

Appear Here: Pop Up Shops, Retail Rentals, Venues for Hire

www.appearhere.co.uk

Find and book short-term retail space in London, Paris and New York. Choose from 1000s of prime high street boutiques, shopping centres and shop shares.

- 5.
6. Level the business rates playing field for ALL small businesses. If i didn't have to pay a rates bill of £9480 annually I could spend this money on employing more staff or opening a second shop. If I operated an online business, selling the same type of product I would pay nothing....
7. Designate Rochester High Street as an 'independent centre' for the Future Medway Strategy and actively learn from / team up with successful independent towns, such as Frome (www.discoverfrome.com), or more locally Whitstable, Faversham, Tenterden, Rye etc.
8. Recognise that Rochester is a living and working commercial town 52 weeks a year, not just a Dickensian theme park. Rather than spend so much council money (£1.2million I understand?) on hosting 3 main heritage weekends a year, split the money more fairly to events and activities that support year round businesses.
9. Consider that council events should be flexible and open to change. For example, change the timing of the winter Dickensian event, so that it doesn't clash with Amex Small Business Saturday every year. Example 2: take part in Independents week each July as other cities and towns do.
10. Have a development strategy for working with Southeastern to bring more people to Rochester by train (refer to the successful campaign that Margate ran several years ago with Southeastern, 'Margate for £10').
11. Reduce the red tape that currently surrounds new initiatives, such as the expansion of the Rochester monthly market.

I appreciate that some of these suggestions could be seen as very specific or more immediate initiatives. However, the Medway Plan shouldn't just plan for 2020s onwards, as some issues need addressing *now*. (That's why I'm also forwarding my feedback onto my local councillors, MP and your colleagues at the council whose remit includes the High Street.

Best regards
Marion Haslam



www.hometownrochester.co.uk

Follow us on Facebook and Instagram and shop with us Tuesday-Saturday 10.00-5.00.



Response to Medway Council's Local Plan Consultation 2012-2035 – Development Strategy

For the attention of the Planning Department

This is the joint response by members of Medway Green Party to the Medway Council's Development Strategy Regulation 18 consultation report.

1. INTRODUCTION

We would like to start by reiterating the first paragraph of our response to the first stage (Issues and Options) of the Local Plan consultation process. In this we said the following:

“We believe that the primary objective of the Local Plan should be to meet the needs of the local population, while at the same time protecting our rich local natural environment. Alongside this, we must take active steps (action that must happen in every Local Authority) to combat climate change”.

It is our view that the latest proposals by Medway Council have failed to meet this criteria. The rhetoric of the Medway Local Plan is worthy but the options presented are ill conceived and add to the problems we face instead of being part of the solution.

We have to realise that the problems we face are multi-faceted and, in some respects, have been made worse by the inactivity of the current Government.

Despite the very serious issues confronting us we have to appreciate also that technology has advanced and there are solutions to our very real problems.

It is not evident, from the Local Plan Consultation document that Medway Council has the least notion of the serious consequences of the path we are following nor of the tools we already possess to forge a better more sustainable future.

We have to face up to the inevitable effects of climate change with all the many and varied impacts that it is going to have on all our lives.

We have to take responsibility for the future and have an adult approach to what we are facing.

Our Council leaders, like Central Government, are avoiding the important issues, whether they be flooding, homelessness, failing harvests, lack of water or pollution, to serve their own laissez faire agenda.

Medway Council seems ill-equipped and lacks the resources to offer the very solutions that are being developed elsewhere to create more sustainable and prosperous communities.

The Medway Local Plan Consultation document is out of date. In several areas the information that would help inform people's opinions has been revised but is not yet available.

The current phase of the consultation is out of step with the availability of the most up-to-date information. For example:

- The revised downward estimates of population growth will only be available later this year.
- The Strategic Flood Risk Assessment of 2006 is only due to be updated later in 2018.

Planning is supposed to be about the best use of resources including the appropriate use of land. A basic concept in modern sustainable town planning is that you don't spend your natural capital. Once you have done that it will be several life times before you can recover that resource, often only at great expense.

- You don't identify land for development which is more valuable in the long term as part of your natural capital.
- You don't identify land which is going to cost more to develop than elsewhere.
- You don't identify land which in the future may be liable to flooding.

On the Hoo Peninsula, Medway Council is proposing to use agricultural land and other natural green spaces for development.

The developments will be built on clay which currently costs more to build on than chalk, will suffer more from the extremes of weather caused by climate change and may result in buildings that are uninsurable.

Similarly, with the risk of flooding on the Hoo Peninsula we don't know what the current risk assessment is, or what it is going to be based on, and whether the Government will adopt a caveat emptor approach to flooding in the way it has to coastal erosion.

The result may well be uninsurable, unsaleable or even uninhabitable buildings.

There is an aspiration in the Medway Council documentation to create a city, centred on Chatham. Due to the Great Fires of Chatham in 1800 and 1820, there are not the old buildings that one sees in Rochester and with notable exceptions the whole of the centre of Chatham can be regarded as a brownfield site ripe for redevelopment.

Given the right sort of vision, most of the needs for development could be catered for in Chatham Town Centre and the waterfront adjoining it, in line with Option 5 submitted by the Green Party last year.

In the following response we will be highlighting several areas where we believe this plan falls short and needs rethinking. This response introduces new information and suggestions which are in addition to our previous responses to the Issues and Options and Development

Proposals stages of the process which continue to represent our position. There are a few areas that we welcome in the latest Local Plan consultation but unfortunately more areas where we believe the plan falls short....

Examples of areas that we welcome:

- We welcome the Council's support for locally built modular housing which we had ourselves proposed in previous responses. However we would like to see measures to ensure that this housing also has high energy efficiency standards to the point of being carbon neutral.
- We welcome the Council's undertaking to maximise the potential for decentralisation of energy production. However, we would like to see more emphasis placed on this with steps towards how it will be achieved. The Council could also do a lot more to maximise the assets available in Medway for renewable energy production.

Examples of areas where unfortunately, we believe the plan falls short:

- A consultation which favours the interests of developers over local people.
- An inadequate basis for the level of development proposed.
- Failure to protect environmentally sensitive land.
- Failure to fully consider the future impacts of climate change and adapt plans accordingly.
- Inadequate response to homelessness and need for truly affordable housing.

Producing a response to all of the questions raised in the Local Plan consultation document is a long process, one that we attempted at the Development Options stage with little outcome. This response will instead be focussed in parts on highlighting approaches that we wish the Council to consider rather than directly answering questions or addressing issues raised in the document. Lack of comment on any particular area should not be regarded as agreement or otherwise with the Local Plan consultation proposals.

Our response will be accompanied by a file of hard copies of evidence/articles which will be delivered by hand to the Council offices. As we hope will be recognised, the Local Plan Consultation is not particularly accessible to the average citizen with other work and family commitments due to firstly the length of the consultation document and secondly the reams of material that accompanies it. However we expect those responsible for analysing the consultation responses to read the much smaller amount of accompanying documents we have supplied.

2. VISION AND STRATEGIC OBJECTIVES FOR THE LOCAL PLAN

Consultation:

There is little evidence that Medway residents were calling for development on the Hoo Peninsula. In fact largely the opposite is stated in the "Report on Development Options Consultation 2017"¹ in which it is stated:

"Overall there was support for a 'brownfield first' approach. Generally local people showed the strongest support for options that intensified development on regeneration sites, and avoided the loss of green field sites. There were a number of

¹ https://www.medway.gov.uk/downloads/file/2238/local_plan_development_options_summary_report, (p19)

responses made specifically to the option of expanding Hoo St Werburgh into a small rural town. Many local residents strongly objected to the loss of rural character and pressure on services arising from such scale of potential growth”.

Though objections to expansion of Hoo St Werburgh are not specifically mentioned in this consultation document [1.16] it is stated that:

“The reaction to the potential for development on ‘green field’ sites in suburban and rural locations varied significantly. A number of developers and agents actively promoted sites in these locations through the plan consultation. Local people and community groups frequently raised much concern about development in such locations, particularly in relation to the scale of growth and the impact on infrastructure and the environment”.

This statement suggests that the latest proposal to develop green field land on the Hoo Peninsula is in the interests of developers and their agents rather than in the interests of the existing (or future) local population.

3. DEVELOPMENT STRATEGY

Defining development needs:

In our last response to the Development Options of the consultation we specifically questioned the population predictions for Medway, given that the basis of prediction is grounded on the assumption that the status quo will continue. We commented that “while some drivers of population growth are constant, others can be affected by changes in the political landscape and choices made by governments national and local”² (P1).

In this stage of the consultation, the unreliability of the assumption is further highlighted by the Council’s own evidence base [3.7] which indicates that recent growth has been nowhere near to the previous levels with a drop of over 40% in household growth in 2016 in comparison to 2012. While the Council has undertaken to update its evidence base in summer 2018, this is after the end of the consultation period, yet no attempt has been made to reflect the potential new figure (it would have been helpful had the Council provided respondents with a scenario) which is likely to require a much smaller amount of development. This brings the whole process into question.

A drop of 40% in predicted future population growth would reduce the target figure of 29,463 to 17,678. Of this 10,121 are already in the pipeline indicating that a much smaller figure of 7,557 additional new homes would be needed over the plan period.

Unfortunately the information offered in the consultation document fails to be transparent as the proportions of pipeline development in each area are unclear. Transparency is further affected negatively by the absence to scrutiny of the “Housing Delivery background paper” which has supposedly been produced to support this Development Strategy consultation.

² Response to Medway Council Local Plan Consultation – Development Options
<https://medway.greenparty.org.uk/resources/Medway/PDFs/Development%20Options%20Response%20Final%20PDF.pdf>

However this does bring into question whether there is a requirement for the scale of proposed additional development, particularly that suggested at Hoo St Werburgh or at any of the other green field or suburban sites.

The consultation document [3.7] highlights the Government consultation paper “Planning for the Right Homes in the Right Places”³. In this the Government has calculated affordability by comparing “the median house prices (based on all houses sold on the open market in a given year in a local authority) to median earnings (based on full-time earnings for those working in that local authority area)” (p11).

The resulting higher suggested levels of house building in Medway would appear to confirm that houses being sold in Medway are too expensive for those working in Medway. However the solution of simply building more houses fails to recognise a more complicated picture of inflated prices caused by active promotion of Medway as a commuter town by both property developers and Medway Council, alongside promotion of property more generally as an asset by financial markets. It also fails to account for the rise in buy to let and lack of availability of socially rentable properties in Medway.

Simply challenging the methodology on the basis that “Medway is comparatively one of the most affordable areas in the South East” is therefore we believe using the wrong argument.

This doesn’t take away from the fact that the government proposals would be even more disastrous than those proposed by Medway Council.

Hoo Peninsula Rural Town:

Medway Green Party is against the suggested large housing development on the Hoo Peninsula which has little or no public support and would mean development of previously undeveloped high grade agricultural land, all of which was described as “unsuitable” in the SLAA. Much greater consideration should also be given to the long term affects of choosing to build in an area which would be more susceptible to the affects of climate change. It should also be acknowledged that a range of factors affect the existing population’s access to services, in particular the Coalition and Conservative Governments’ austerity drive. There are also alternative ways that the local community can improve local services in the community such as through setting up Community Land Trusts which don’t require investment by private developers or large scale development plans.

It is difficult to see objective arguments for development other than the provision of alternative forms of transport to car travel, which we feel should happen anyway. We would therefore give qualified support for a passenger rail service on the Hoo Peninsula but would need more information. We would also expect this to be publicly supported and provided without negative impact on the local natural environment. It would also need to provide access to the rest of the Medway area in order to allow local people access to employment opportunities at Kingsnorth and Grain. This could be complemented by river transport.

With expected lower figures in regard to future population changes, we would suggest that the majority of housing expansion should be restricted to urban regeneration areas with increased alternative travel options providing better access to and from the Hoo peninsula from urban areas. In these urban areas there should also be much more emphasis on ensuring that the accommodation provided is affordable.

³ “Planning for the Right Homes in the Right Places”

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Homes_Consultation_Document.pdf

Distribution of Development:

As we are against large scale expansion on the Hoo Peninsula this means that we reject all of the scenario's offered in this phase of the Local Plan consultation. We also do not consider proposed development of Capstone Valley or Rainham to be sustainable. We do not agree that there are grounds for dropping Scenario 1 of the last phase of the consultation which we feel has largely been dropped at the behest of private developers rather than due to responses by the local residents. We cannot fully support DS2 as it includes the development of a small rural town at Hoo.

We also continue to oppose development on the SSSI at Lodge Hill for reasons detailed in our previous response⁴. We note that Medway Council are now proposing a reduced number of houses at the Lodge Hill site in relation to previous proposals but we do not consider that this will be sufficient to alleviate concerns, not least the wider impact of developing land protected by an SSSI designation. We support the RSPB's call for a protective buffer between the SSSI and any new housing but would go further and call for a complete revision of the Council's plans in relation to development on the Hoo Peninsula in light of the impact on local community, loss of important agricultural land, impact on wildlife and effects of climate change.

We also reiterate our previous alternative suggestion for sustainable growth⁵ which would be to "focus on the regeneration of Chatham as a dense urban centre and the redevelopment of Medway City Estate as a mixed development, while using the urban section of the river to its maximum potential...the emphasis would be on mixed development of residential, business and retail in Chatham with light industrial added to the same mix in the Medway City Estate area...redevelopment of the Pentagon would be considered as a priority"

Climate change:

Climate Change is going to have more impact on development on the Hoo Peninsula than elsewhere in Medway.

Much of the Medway Council area has chalk sub-soil. But a significant portion, the majority of the Hoo Peninsula has clay sub-soil. (See appendix: British Geological Survey – Superficial Geology Map).

The clays underlying the Hoo Peninsula belong to various categories but they will mostly respond in similar ways. (See appendix: British Geological Survey – Bedrock Geology Map)

There are three relevant characteristics of a clay sub-soil.

1. The clay shrinks when it is dry.
2. The clay expands when it is wet.
3. The clay does not drain freely.

The impacts of climate change already being experienced have been evidenced by warmer wetter winters and hotter drier summers.

⁴ Response to Medway Council Local Plan Consultation – Development Options, (p4).
<https://medway.greenparty.org.uk/resources/Medway/PDFs/Development%20Options%20Response%20Final%20PDF.pdf>

⁵ As above (p5)

These impacts are likely to increase as climate change progresses and global warming increases. (See appendices: reports)

Future proofed building developments on a clay sub-soil are going to require expensive foundations designed to withstand the movement in the ground.

The expanding and shrinking of the clay under the buildings is going to increase with more concentrated rainfall and flooding during the winter and higher temperatures and more sunshine during the summer.

We do not yet have sufficiently robust legislation to regulate for the situations that property owners will find themselves in, in the future.

If clay sub-soil was the only land available and modern construction methods were to be followed, it would be recommended to build with piled foundations, purpose designed for each situation but with piles going down more than 3 metres into the firmer clay strata. (See appendix: Peter Barry Article)

Modern construction methods use very rigid structures, with a modern tradition of strong bricks and hard mortars etc.

These rigid structures are currently very prone to show cracks in the building fabric under the slightest movement.

Historically traditional buildings were built with softer bricks and lime mortars that made the buildings more flexible and resilient to movement.

The more flexible building would however shift around on their shallow foundations and change shape.

With the likely impacts of climate change in the future, buildings with foundations designed to satisfy current legislation, the cracks are going to be more than cosmetic.

If we continue to build to satisfy the conditions that were current when the building regulations were last updated, the foundations and construction methods are likely to prove inadequate and after a few major repair claims, the property owners are likely to find that they have an uninsurable asset.

The ownership of these assets will be substantially shared with mortgage lenders who will soon become aware of the risk of lending money to purchase properties built on clay.

The third issue with building on clay sub-soil is the resistance to drainage of surface water.

Unlike chalk, which drains freely, clay resists absorption of water, and below the softer surface layers the clay will become impermeable.

Surface water drainage of building developments on clay is going to become an expensive item in the building budget, if we are to plan for the impacts of climate change and avoid flooding and devastating damage to property in the future.

The climate that we are likely to experience in the future already exists in other countries.

In developed countries with high winter rainfall and hot summers, much more robust infrastructure design standards are used than are current in the UK.

The recent heavy rainfall in June 18 has demonstrated how inadequate our infrastructure design is when trying to cope with intense rainfall.

The measures needed to ensure damage isn't caused in the future are going to be expensive but much more expensive when building on clay sub-soil than on chalk.

The practical approach to providing the development that we need is to build at higher densities in a truly urban context where the infrastructure costs can be concentrated into a smaller area.

Building at higher densities on chalk will be much more affordable than building on clay. It is difficult to comprehend why the Local Plan doesn't reflect this.

4. HOUSING.

Affordable Housing.

The consultation document (Policy H1) includes a commitment to “meet the needs for market and affordable housing that responds to the objectively assessed need for housing and meets the principles of sustainable development” but there is little information on how this will be achieved.

In fact, the Council's proposals appear to contradict this statement. This is especially so in the statement in 4.11 “However the Local Plan needs to be deliverable, and must demonstrate that the policies are viable” followed by assertions that 25% of affordable housing could be achieved in urban areas and 30% in rural areas. This includes figures which, as we pointed out in our response to the Development Options stage of the consultation⁶ are grossly inadequate to meet the identified need.

There is a complete lack of exploration of alternative solutions to private development and no exploration of alternatives that could enable the Council to build social rentable housing directly with or without changes in government policy which could also occur over the plan period. Nor is there any sign of the Council showing any support for the potential contribution of Community Land Trusts in providing communities with affordable housing.

It is also difficult to see how development of green field sites at Hoo or indeed of the SSSI at Lodge Hill can be regarded as “sustainable” and, as pointed out earlier, the identified sites on the Hoo Peninsula were deemed to be “unsuitable” in the SLAA. It is also unfathomable how neglecting to take into account the impact of climate change on the preferred site can be described as “sustainable”.

There is no information about why “rural areas are much stronger in terms of viability in Medway” but one can only assume that this is because private developers regard building on green field sites as more profitable. This favours short-term profit for developers over benefits for the local and future population who are likely to suffer higher costs in the long-term.

⁶ Response to Medway Council Local Plan Consultation – Development Options, P9
<https://medway.greenparty.org.uk/resources/Medway/PDFs/Development%20Options%20Response%20Final%20PDF.pdf>

Inward migration from London:

Chatham is the most economic town in the South East of England for people with jobs in London to commute from.

This economic situation applies to both those wishing to rent accommodation and those wishing to purchase their accommodation. (See appendix: London's most affordable commuter towns)

The reason that both accommodation rents and prices are lower than elsewhere is partly historical and partly due to lack of imagination and ambition on the part of Medway Council.

The historical reasons go back to Chatham being reliant on the military for its existence and prosperity. It also goes back to the thousands of meanly built, inadequate houses that were thrown up in row upon row, during times of Empire, to house those not given a share in the spoils but nonetheless expected to do the hard work.

In the nuclear age it was decided that Chatham was a vulnerable target, too close to London to be comfortable for the rich and powerful.

When government decided to ditch Chatham as a military centre and abandon it to its fate, it did so without providing the resources to provide employment and decent housing for many of the residents cast adrift by the government.

Chatham became well known as a cheap place to live and a cheap place to buy property for aspiring landlords.

Lack of resources and lack of concern for the people of Medway have conspired to produce a situation where we have relatively cheap houses to buy or rent in an environment that feels like a depressed area.

Medway streets and green spaces are characterised by homeless people sleeping rough in their hundreds, yet ironically in Medway you can find a great location to moor your yacht or park your aeroplane.

With imagination, aspiration, ambition and fellow feeling, Medway could become a wonderful, sustainable, green place for everyone to live and flourish, rather than somewhere commuters can find cheap accommodation and property developers can turn green fields into massive profits.

Unused assets in Medway:

Large private developers appear obsessed with the outdated notion of building all their houses for married couples with two or three children and of course these houses have to be built on green fields presenting an idealised image, seemingly based on the notion that we still live in the 1950s.

However, times have changed and we now have on average, much smaller household sizes, a greater variety of needs for accommodation and an all together more complex situation than the one being rolled out via the planning system in the Local Plan.

Before Medway Council proposes hard and fast figures for new houses, they need to look at the un-used assets that exist in Medway.

The obvious un-used assets are empty homes. In Medway the number of empty homes has reduced from 1,649 in 2004 to 879 in 2015. (See appendix: Council Tax Base) This is still a considerable number and, in the past, we might assume that these properties were in the process of re-development. In the current political climate, we might assume that they are just a wasted asset. (See appendix: Empty Homes Report)

Modern technology has brought about a revolution in the way we carry out office work. Many more people, in large organisations, work from home, at least part of the week, aided by improved telephone connectivity, user friendly software and portable computer power.

The requirement for office space is reducing as new ways of working are becoming the norm. This trend has long been recognised by the Planning System under the Permitted Development rules for converting office space into residential accommodation.

We now need to quantify this potential asset and off-set its potential against the perceived demand for housing.

Similarly, our town centres have a lot of space over shops which was once used for accommodation and has now been left empty.

Equally, space over shops purpose designed for storage is now no longer needed as the modern supply chain and ubiquitous bar-code makes it more efficient and economic to hold limited stock.

These are further un-used assets that we need to quantify and off-set against our housing requirements.

Homelessness:

HOUSING FIRST – THE ANSWER TO HOMELESSNESS IN MEDWAY

One is encouraged to believe that a Conservative Government exercises prudent house-keeping and good commercial sense.

Unfortunately, our current government is notorious for exercising false economies as they strive to protect the wealth of the rich and powerful, in the name of 'austerity'.

In Medway where we want to be proud to show visitors our towns and countryside our streets and green areas are characterised by people sleeping rough in all weathers and scores of other individuals and families sleeping in tents, cars, on friend's sofas or in temporary accommodation.

Apart from the misery and suffering caused to those who are homeless, there are hundreds of unseen help givers and supporters who donate their own money and time in trying to relieve the suffering. (See appendix: Medway Messenger Article)

There are no beneficiaries to this unnecessary situation, only losers; the biggest loser of all being the good reputation of Medway.

The circumstances that caused people to become homeless in the first place are exacerbated by their situation and make it harder for individual to access support and address the problems that resulted in them becoming homeless.

Homelessness makes it harder for people to access what support is available, and it has been shown that providing adequate permanent housing as a first intervention step is actually cheaper than leaving people with issues that can only increase and get worse on the streets.

This callous approach to the needs of others in society, is particularly hard to understand when so many of the people sleeping rough on our streets have formerly risked their lives in the armed services and are now suffering the mental and social consequences.

More enlightened countries such as Finland, Canada and Scotland are demonstrating that it is cheaper to adopt a 'housing first' policy to homelessness and that there is no excuse, moral or fiscal, not to do so.

(See appendices: Crisis report 'Everyone In', Homeless Link 'Housing First in England', The Guardian 'Lessons from Finland: helping homeless people starts with giving them homes'.)

We note that Medway Council have promised to consider piloting a "housing first" policy in their "Homelessness Reduction Strategy" but would urge Medway Council to fast track this policy.

5. EMPLOYMENT

Opportunities in the green economy:

Small initiatives like the electricity feed-in tariff for installing photovoltaic panels on residential properties has had a tremendous impact on the number of jobs available in the green economy. If the government hadn't reneged on the promise of a carbon free building industry, by cancelling the requirement for sustainable homes, the green economy would now be flourishing throughout the construction sector.

Circumstances are changing and we need to plan for them. For example, coal fired power stations are becoming fewer in the UK, so there will be less home-produced fuel ash to use in the manufacture of autoclaved aerated concrete blocks.

We need to constantly search for new ways to do things and sometimes to take a second look at methods which we formerly used and for various reasons stopped using.

Among these methods would be the use of hemp in various forms. Commercial hemp can be grown locally and the plant material processed into a number of useful products. Advocates of growing hemp cite 30,000 known products that can be made from it, from canvas, paper and rope, to building blocks and concrete additives at one extreme to oils and lotions at the other.

The green economy is going to depend, in the main, on natural products, many of which we can grow. Maintaining the full extent and full potential of our natural capital is the only sure way we can keep all our options open.

In our last response to the Development Options stage of the consultation⁷ we highlighted several other examples where "Green jobs" could both improve the local economy and

⁷ Response to Medway Council Local Plan Consultation – Development Options, P13
<https://medway.greenparty.org.uk/resources/Medway/PDFs/Development%20Options%20Response%20Final%20PDF.pdf>

respond to environmental crises but there is no indication that the Council acknowledges either the need for or the opportunities of this approach.

While we welcome the Council's recognition of the opportunities available in modular construction factories at employment sites like Grain and Kingsnorth, we would like to see measures to ensure that this housing also has high energy efficiency standards to the point of being carbon neutral.

The Local Plan consultation also unfortunately continues largely with a "business as usual" approach that focuses on economic growth in isolation, without showing any signs of supporting a joined up strategy which combines employment opportunities with taking essential measures to address climate change.

In addition, in our previous response, we highlighted that working patterns are likely to change over the planning period, for example with more people working from home, yet the Council continues to seek additional office space on land that could be used for housing.

There also appears to be an assumption that the public will support a new town at Hoo, as this underlies much of the text in this section. Our opposition to this has been made clear in other sections.

Alongside this the consultation notes that agriculture is a "key industry in the rural area, making a significantly higher contribution to the local economy than the national average" [5.3] It also reports on the high quality of agricultural land in the area.

The Council undertakes to promote this form of industry as long as it "does not conflict with other policies" in the Local Plan, placing a strong priority on its proposed policy of development on this farmland.

We strongly disagree with this approach. The priority should be to preserve our natural environment and where development needs conflict with this, alternatives for that development should be properly explored.

6. RETAIL AND TOWN CENTRES

In the recent past, town centre congestion and our newly acquired access to personal transport, led us in an unthinking way to adopt the American concept of 'out of town' shopping. The effect on our town centres was foreseeable but nonetheless disastrous.

The impact of out of town shopping on towns in Medway varied and Rochester, for example, has fared much better than Chatham.

Now, due to changes in technology our relationship with retail is changing once again and we are now shopping via the internet, from our sofas. So, what are we likely to be doing in 2035? Is the trend likely to continue? Is it a fad? Will it become our only way of shopping?

The July 2018 edition of the Which? magazine has an investigation into the impact of online shopping on our high streets. Since 2004 the proportion of retail sales made online has risen from around 3% to an estimated 18% in 2018, and at the current rate of growth, the proportion of retail sales made online, would reach 35% by 2035. (See appendix: Which? July 2018 cover)

For the high street the result has been fewer shops selling – confectionery/news, fashion and clothing, music/games/DVDs, shoes, cards/gifts, betting, antiques, books, flooring, household goods and furniture/textiles.

In contrast there are now more – convenience stores, coffee shops, beauty salons, nail bars, restaurants and bars, barbers, vaping stores, healing/treatments, food takeaways, tattoo parlours and cafes.

Society is not dead, and we are social animals. Our urban centres can become the focus of where we come together for very many reasons, associated with leisure, culture, socialising and shopping.

According to Which? the Centre for Retail Research predicts the high street will become more leisure-focused with more space allocated to restaurants, coffee shops, 'artisanal' food, health and beauty, dance and fitness. It also predicts that the high street will increasingly be a place where people go to fetch their goods from click-and-collect lockers and continue as a place to access services.

How much more vibrant then, would our urban centres be if they represented a mix of residential, retail, office and creative spaces together with cultural and social venues.

Re-thinking our urban centres around the concept of somewhere to live, would bring life back to places that already possess the necessary infrastructure, reduce the pressure on transport, save our natural capital and provide an opportunity to create a sustainable urban environment.

The regeneration of Chatham could create a vibrant city centre with a thriving retail economy at the heart of Medway. To achieve this, it must be a truly desirable place to live and visit and avoid the unfortunate planning mistakes of the past where incompatible uses have been allowed in town centres.

What will be the future of 'out of town' shops? Is there some indication that they are on the decline and are 'out of town' shops becoming less popular? We already have examples with the large retailers at Horsted, where two companies have merged, one is in financial difficulties and another one has closed down.

We now have our groceries delivered to our door and the streets are crammed with vans loaded with items that were just a click of the mouse away from our computer screen. So, is the supermarket also under threat?

Is the projected 35% online shopping by 2035 going to reduce the footfall at our 'out of town' shopping centres. We will need to monitor the situation closely.

In the interim, we have the opportunity to re-think our use of the car parking spaces that the superstores offer, something the architect, Bill Dunster has already done with his Zero Energy Development housing pods that sit above retail car parking spaces. A sizeable percentage of Medway's future housing needs could be met with this cost-effective approach to providing affordable accommodation.

7. NATURAL ENVIRONMENT AND GREEN BELT

Air pollution and tree planting:

There was no allowance in the past, when much of Medway's built environment was constructed, for the motor car. Now our residential streets are jammed with them, such that residents are afraid to use their car in case they can't find anywhere to park when they return home.

Many of our residential streets, in Medway, are not called 'roads' but 'avenues' suggesting that they were once lined with trees.

There is evidence to suggest that trees have been removed to make way for car parking or simply to cut back on the maintenance costs of grass cutting and pruning.

Now we have a situation where countless front gardens have been paved over to provide car parking and polluted surface water flows into the drainage system, despite there being regulations to prevent it happening.

The loss of trees has had an impact on air quality and air pollution locally is sufficiently high as to be a health hazard.

The type of air pollution experienced in the past from coal fires was more obvious as people could see the smoke and experience the resulting smog. Today's air pollution contains invisible particles that are equally detrimental to health but not so noticeable.

One way to remove pollutants from both surface water and air, is to plant trees in our streets. Urban Forestry projects in the United States North West, which has a similar climate to the United Kingdom, have shown that tree planting will improve the quality of both the surface water runoff and air.

The savings on storm water treatment in both quantity and quality have more than paid for the implementation of the projects.

With climate change our urban areas are going to be hotter in the summer and a greater amount of energy will be required for cooling. Trees will provide shade and prevent the associated hard surfaces re-radiating their heat or becoming thermal storage sinks.

These projects have also demonstrated that planting trees in the streets has had numerous other benefits, from improved physical health and mental well-being, to an increase in property values and consequently an increase in the rateable value of properties. (See appendices: City of Vancouver – Urban Forestry Management Plan, Portland's Urban Forestry Canopy and Newcastle City Council – Highway Tree Design Guide.)

Air pollution and Hoo Peninsula:

The Peninsula has supported power stations powered by fossil fuels for a long period, and continues to do so. One aspect that has not been commented on is how much this might affect the air quality in Hoo. We would ask that the Council fully explore this.

Planning for climate change:

The United Kingdom prides itself on leading the industrial revolution and, one hundred and fifty years ago, being the workshop of the world. The rest of the world has followed our example and we are facing the disastrous consequences.

The human species has destroyed the habitat of countless other species of animals, birds, insects, fish, plants and micro-organisms. We have destroyed other parts of the earth's eco-system that we didn't even know about. Now we seem bent on destroying our own habitat.

For more than forty years we have been using the earth's resources at an unsustainable rate to the extent that we now need several times the earth's capacity for renewal to sustain our use of resources. Yet we only have one earth to live on.

The burning of non-renewable fossil fuels is the cause of our excessive carbon emissions and at the root of climate change. Beyond a certain point, scientists believe that the global warming which is at the heart of climate change will become irreversible.

What can Medway Council do?

- It can divest from the fossil fuel industries. (This will most likely involve changing its bank, pension fund or modes of transport)
- It can divest from companies that exploit and pollute other countries for their own profits. (Buy Fairtrade products or not at all)
- It can encourage our government to invest in research to improve technologies that won't destroy our habitat.
- It can lead by example and show other countries how to educate their populations in using new technologies.
- It can educate its staff in the intricacies of the challenges that face us and the exciting prospects available to reclaim our future existence on the planet.
- It can stop inappropriate use of our natural capital. This means stop concreting over, polluting or in any other way destroying our natural environment.
- It can make our natural capital work for all of us, by appreciating the true value of our woodland, fields, meadows, lakes and rivers and planning accordingly.
- It can help us use environmentally friendly ways to protect ourselves against the impacts of climate change for example: flooding, drought, crop failure and energy demands.
- In Medway we can do all of the above as well as producing a local plan that doesn't destroy our natural capital for the short-term objectives of property developers.

8. BUILT ENVIRONMENT

Renewable energy and building design:

We need to develop the means to meet all our energy needs with renewable energy within the timescale of the Medway Local Plan. Now, just prior to the commencement of the plan period, we have the technology to produce zero energy developments as defined by Bill Dunster in his book ZEDLIFE. Zero energy means not using any non-renewable energy sources that we know are polluting, un-ethical, dangerous and have better uses than being burnt.

Architects are trained to understand the technologies that are going to be needed to provide zero energy developments. Unfortunately, the government is happy to subsidise the murky

world of fossil fuel energy and volume housebuilders rarely use anyone qualified architecturally to design their houses.

Our new buildings need to produce all their own energy needs, by using renewable energy technology, and then some extra for the neighbouring historic buildings which we don't want to adapt by retro-fitting renewable energy technology to them.

The buildings we create need to make use of their location and the advantages that it offers in terms of renewable energy sources, orientation and aspect. Passive solar design concepts and renewable energy technology can then be combined to produce buildings that are comfortable in all seasons and inexpensive to run.

For many decades the Royal Institute of British Architects has been promoting the concept of 'long life, low energy, loose fit' for the design of buildings. Regrettably the majority of the buildings, we now see being erected, are the complete opposite.

Coal, Gas and Oil do not need to play any part in our future energy production. We can have a safer, more secure and greener country without them.

Our energy requirements for the foreseeable future will be in the form of electricity. There are numerous ways that electricity can be produced and solar- photovoltaic panels are the most common example related directly to buildings.

We need energy for heating and, with climate change, more and more for cooling in the summer when solar photovoltaic panels are at their most efficient.

Buildings also need to be designed to collect and filter rainwater, re-cycle waste water, re-cover heat, provide ventilation and sanitation. Essentially, they need to do this with space standards that are fit for purpose for the occupants.

If we have the technology and can do this already, why aren't we?

BASIC LOW-CARBON BUILDING PRINCIPLES – REDUCE DEMAND (See appendix: ZEDlife Bill Dunster)

1. **FABRIC FIRST:** Adopt the highest level of energy efficient building fabric appropriate to the climate. In the United Kingdom the wall, floor and roof construction heat loss should be reduced to a minimum of 0.14 Watts / metre squared / degree Kelvin. Heat loss through double or triple glazing should be no more than 1.0 Watts / metre squared / degree Kelvin.
2. **AIRTIGHT:** Minimise external air infiltration and recover heat. We need airflow from outside to inside of a building to live healthily, but this can be controlled and heat recovered from stale air.
3. **USE DIRECT SUNLIGHT TO CREATE HEAT:** Passive solar gain is what you get by doing nothing, if your house is working for you. In a super-insulated building with sufficient thermal mass, a good standard of airtightness and heat recovery, it is possible to create comfortable internal conditions with minimal conventional heating.
4. **CO-ORDINATE ORIENTATION AND GLAZING POSITIONS:** Understanding window orientation is critical. It is important to minimise north facing windows and ensure they are triple glazed with a thermal break in the frame.
5. **ACHIEVE CROSS-VENTILATION AND URBAN AERODYNAMICS:** Understand the potential of the prevailing wind. Wind blowing on one side of a building will make it positively pressurized and the opposite side of the building negatively pressurized. This phenomenon can be used to provide cross-ventilation.

6. AVOID THE URBAN HEAT ISLAND BY PASSIVE COOLING: Allow the prevailing wind in summer to remove heat.
7. REDUCE ELECTRIC DEMAND: Make electricity use as efficient as possible, and switch stuff off when it is not in use.
8. REDUCE WATER DEMAND: Water is a precious resource. Use spray taps, showers and water saving white goods.
9. REDUCE EMBODIED CO2 CONTENT: Avoid highly processed building materials.
10. CREATE HEAT FROM BIOMASS. Use something grown containing carbon to produce heat.
11. CREATE ELECTRICITY FROM BIOMASS: Use a combined heat and power engine to produce heat and electricity.
12. USE WIND TO CREATE ELECTRICITY: Wind technologies complement solar technologies perfectly.
13. CREATE ELECTRICITY BY USING WATER-FLOW: Electricity can be generated though flowing water in several ways.
14. ADAPT AHEAD OF CLIMATE CHANGE: In the United Kingdom, we can expect milder winter temperatures with higher peak rainfall and flash flooding.

As a sound alternative strategy, the Medway Local Plan could make it clear that planning applications for buildings designed according to the above principles would be favoured against those that disregard the attributes of the site and the potential for using renewable energy.

9. HEALTH AND COMMUNITIES

Health:

We welcome the recognition in the consultation document that a wide range of quality of life factors contribute to good health [9.4]. As pointed out in our previous response at the Development Options stage⁸ the Green Party believes that health for individuals is only possible in the context of a healthy environment and society.

We also welcome the Council's aspirations in regard to healthy food environments and 'dementia friendly' areas.

However we are concerned that the Council appears to have framed "quality of life" as secondary to its aim of "creating and sustaining economic growth" [9.4]. Treating economic growth as a panacea from which good outcomes will result is often used to facilitate actions which are in fact detrimental to our wellbeing and the natural environment which supports us. For example, much of the health inequality that the Local Plan consultation document describes could be improved by a better economic system which didn't favour trickle-down economics. There is little indication of how the proposals in section 3 will improve health.

Health facilities:

It is unsurprising that access to GPs and other healthcare facilities is causing a great deal of concern. The Local Plan consultation document fails to mention the lack of investment in existing Health and Social Care Services by the Coalition and Tory Governments which is a major contributing factor to these difficulties alongside ongoing reorganisation.

⁸ Response to Medway Council Local Plan Consultation – Development Options, P19
<https://medway.greenparty.org.uk/resources/Medway/PDFs/Development%20Options%20Response%20Final%20PDF.pdf>

The Health and Social Care Act has been instrumental in furthering rather than reducing the problems as it transformed the internal market within the NHS, which was already detrimental to the service to an external market which is making things worse. This brings it more in line with Social Care provision which has been suffering from existing as an external market since the 1980s. The pressures on Council funding from central government cuts are unlikely to improve the situation.

The Green Party supports the campaign for a NHS Reinstatement Bill which would remove both the external and internal market from the NHS and restore the NHS to its original form. <http://www.nhsbillnow.org/>

We would urge that Clinical Commissioners and the Council recognise the impact of endless reorganisation on both service users and staff. A new provider doesn't necessarily mean a better one, and a cheaper offer is likely to involve poorer quality service or poorer conditions for staff. Moving a service from an NHS provider to an alternative provider also risks losing the service altogether as non-NHS providers can go bankrupt if they find themselves unable to provide the required service at the cost promised.

We would suggest that switching to an alternative provider when renewal of contracts is being considered should only be taken as a last resort. The focus should be on working with the existing NHS providers to facilitate continuation of service provision, with improved outcomes if required.

We are yet to fully assess the likely impact of the Kent and Medway Sustainability and Transformation Plan, but reiterate that we would not want improvements in community services to be at the cost of reduced hospital services.

Community:

We largely agree with the measures described to protect communities from loss of facilities and also with encouraging communities to produce Neighbourhood plans. We would, however, like to see more measures which aim at improving broadband and transport services in rural communities.

We also note that while it is proposed here that protection from loss of community facilities requires evidence of public consultation, there seemed to be no such requirement on the Council in relation to the closure of Deangate Ridge Golf Course. We would like to see measures detailed that will ensure that neighbourhood plans or other community led processes have adequate weight in the decision-making process.

10. INFRASTRUCTURE

Climate change:

The United Kingdom's infrastructure is largely built on the premise of a benign climate and a parsimonious treasury.

We try to live the myth that it doesn't get too hot or too cold, too wet or too dry for our daily life, transport and commerce to be disrupted to the point of fiscal false economies on a disastrous scale.

Well if, our tarmac didn't melt, our rivers didn't freeze, our houses flood or our crops wilt in the past, then they are going to in the future and not just in the further reaches of our islands but here in the South East of England.

Climate change is something we need to recognise and plan for. We need to make our infrastructure more robust and resilient to cope with the impacts of climate change that we are already experiencing let alone those in the future that are going to be much more extreme. (See appendices: HM Government – UK Climate Change Risk Assessment 2017, State of Medway Report – Climate Change, Renewables and Flooding, Tomorrow's England – Our changing climate, our changing lives – The South East, Department of the Environment – A summary of climate change risks for South East England.)

There is no evidence that new standards are going to be in force in time to guard against the chaos and economic losses incurred by the disruption to our transport system, our built environment and our countryside.

Our one hope is that the planning system will do what it is set up to do, that is plan for the future, taking into account not only the trends in our climate that are self-evident but anticipating those we will experience in the future.

Unfortunately, the Medway Local Plan ignores the reality we face, promotes sprawling suburban development on our precious farmland and makes no allowances to cope with what lies ahead.

On 29th May 2018, we had a small sample of the disruption caused by intensive rainfall. The type of rainfall experienced regularly, and coped with, in other countries. This is not the sort of rainfall that volume house builders are going to voluntarily guard their unsuspecting customers against.

The only economically viable approach to planning for the future impact of climate change is to develop in a focussed way on limited areas of land where the density of the development will offset the cost of providing the resilience and robustness of the infrastructure that will be required.

Coastal defences:

Coastal inundation is not a phenomenon that anyone who remembers the tidal surge of 1953 wants to experience again.

The United Kingdom is blessed with thousands of miles of coast and river estuary. We now have to rethink what this means in terms of climate change and how we can plan for a future that enables us still to inhabit the land adjacent to our coast and river estuaries.

A typical Government Treasury Department response might be to sacrifice the property of thousands of people as sea levels rise just so long as the City of London is protected. (See area designated for abandonment by the Environment Agency due to rising sea levels - ZEDlife p23)

In reality the City of London won't be protected unless the rest of the Thames Estuary and Medway Estuary are also protected in conjunction with an inclusive flood protection scheme.

We are beginning to experience milder winter temperatures with higher peak rainfall and flash flooding. We are also beginning to experience the impact of melting ice both at the North and South Poles and in glaciers worldwide.

The fresh water contained in the ice will have an increasing impact on ocean currents as it reacts with the saline water causing disruption to the normal oceanographic dynamics.

The melting ice is also having the effect of raising sea levels, and like the Government of the Maldives we need to take this seriously.

The architect, Bill Dunster has proposed a line of coastal defences for the Thames Estuary in conjunction with a new longer and higher Thames Barrier. These defences take the form of a dyke and are subsidised by incorporating development into them and over them.

'The dyke would join up areas of higher ground to the north and south of the river, thus holding back water from low-lying residential areas on each side. Added value could come from running a light tram on top of the dyke, connecting existing transport nodes. The ZEDdyke would need to be as good as tried and tested Dutch sea defences and then it might be possible to integrate enough earth-sheltered housing into the flood defence wall to fund its initial construction.' (ZEDlife)

The Medway Local Plan needs to respond to this challenge.

11. TRANSPORT

Promoting Sustainable Transport; Integrating Land Use and Transport Planning:

We agree with the Council's proposal to focus high density development at travel hubs, but think that, in addition, more needs to be done in Medway to improve access to alternative forms of travel to have any chance of reducing congestion and pollution in town centre areas and beyond.

Unfortunately the only way we can improve the sustainability of transport is by a reduction in our dependence on private car travel. This is acknowledged to be part of national planning policy in the Consultation document (11.10). However, currently alternative forms of travel are often less attractive in Medway. There is often not the "real choice" in how we travel. The cycle network in Medway is fragmented with dangerously narrow cycle lanes on busy roads which often come to an abrupt stop and bus and train fares are prohibitively expensive and inaccessible in some areas. It is therefore unsurprising that those who do have the choice of travelling by car (which is by no means all) often favour this form of travel. Even if people would like to improve their impact on the environment by having an electric car there is little to encourage this alternative with lack of available charging points.

In our last response⁹ we suggested that planning priority should be clearly given to certain forms of transport over others, with walking and cycling coming first followed by public transport, then taxis and light goods vehicles followed by cars and lastly HGVs. We also suggested more emphasis on the benefits of the river for travel options.

While this stage of the Consultation gives the nod to this approach there is little to suggest that it is doing much to further it. ArrivaClick and Oyster style cards may be concepts that will take on and are to be welcomed. However they do little currently to address affordability with ArrivaClick being aimed at high end. While we recognise that the Council may have limited control in some of these areas, we would like to see a clear commitment to the above transport hierarchy with an outline of steps towards improving access to alternative forms of transport with the aim of making it attractive to all.

⁹ Response to Medway Council Local Plan Consultation – Development Options, P24
<https://medway.greenparty.org.uk/resources/Medway/PDFs/Development%20Options%20Response%20Final%20PDF.pdf>

Strategic Transport Infrastructure:

We have not had time to explore the basis of the HIF Forward Funding Stream but are concerned about the implications. We believe that investment should be dictated by need whether it is social or environmental. The current political elites are yet to appreciate the dangers of putting growth, and usually this is economic growth, ahead of human and environmental wellbeing. It is important that Medway Council is not led into making important planning decisions that will affect all of our futures by what may seem to be an attractive financial option which would help towards meeting housing targets, but brings with it detrimental effects on the local population and environment.

Such appears to be the case with the Council's application for funding to assist development on the Hoo Peninsula. While reopening the train line to passengers is likely to provide benefits and is an option that we give qualified support (on the basis that it doesn't impact on the natural environment and is linked to the transport service serving Medway) building additional roads will not. Building more roads would also conflict with the travel hierarchy that the Council appear to be giving some recognition.

We are concerned that the intention is to open the railway line for the purpose of making high density development in the area fulfil the category of "sustainable"; and that this high density development would follow the pattern of other high density development in Medway which is to be unaffordable to local people and attract higher migration into the area from London which clearly is not an approach which leads to sustainability.

In the context of the other reasons for our opposition to major development on the Hoo Peninsula outlined in other sections of this response, we therefore cannot support this approach, but would call on the Council to explore other options for reopening the line to passengers for the benefit of existing residents and provision of travel alternatives.

Residential streets:

It would appear that Medway Council is trying to impose a twenty mile an hour speed limit on our residential streets. While we welcome this initiative, doing it solely by not maintaining the road surface is short sighted and a false economy, especially for those who bare the cost of maintaining their vehicles damaged by driving through numerous potholes.

River transport:

The Medway Council area is defined by its rivers and the predominate one is the River Medway itself. The Romans were the first invaders of England to build a bridge across what is now called the River Medway. The roman bridge and subsequent bridges have limited the use of the river and kept large commercial river traffic on the downstream side of the bridge.

Formerly there were wharves on both sides of the River Medway in the reach opposite Rochester and Chatham. Now there are only wharves in commercial use on the Medway City Estate side of the river.

Discussion with river pilots whose job it is to safely navigate the river and bring vessels alongside the wharves, has highlighted the fact that access to the wharves is only available for a very short period at high tide.

In the future it is possible that the facilities for off loading cargo may have to move downstream. It is also possible to build a lock with an adjacent electricity generating weir, somewhere along the river between Gun Wharf and St Mary's Island, to enable large vessels to access the Medway City Estate wharves more easily.

A lock would create a situation of permanent high tide in areas currently occupied by houseboats and leisure craft. The effect on the houseboats would be very positive as they would no longer be grounded twice every twenty four hours. It would also make for a much more attractive environment for leisure craft, while producing considerable amounts of energy.

A lock would be a long term option but it would have the added advantage of giving pedestrians and cyclists the ability to cross the river.

The disadvantage of a lock would be the effect that it would have on the mud dwelling organisms that need air to survive.

Ferry across the Medway:

The prospective operators of a ferry service from Sun Pier to Medway City Estate say that they have been in consultation with Medway Council for over two years. The only issue preventing this vital and valuable service from starting is a lack of landing facility on the Medway City Estate's side of the river.

12. MINERALS, WASTE AND ENERGY

Renewable energy – Energy production within urban development:

We welcome the Council's undertaking to maximise the potential for decentralisation of energy production, though we would like to see more emphasis placed on this with steps towards how it will be achieved.

However, the Medway Local Plan consultation continues to be highly focussed on energy produced by fossil fuels. It points to using waste heat from power stations in Hoo but this would only result in further dependence on energy sources that need to be eliminated.

New technology gives us the potential to have all our energy requirements provided from renewable and sustainable sources.

Architect, Bill Dunster, in his book 'ZEDlife - How to Build a Low Carbon Society Today', discusses how recent technological advances will make it possible to free our society from its current reliance on non-renewable polluting energy sources.

Dunster says 'Zero-carbon, zero-waste design, will change construction component design, architectural form, and suggest a fresh look at urban design. Due to a mixture of innovation and economies of scale, it has become possible to design buildings that are both energy positive and capable of offering zero net annual energy bills at the same time as powering personal transportation and making no net contribution to air pollution.'

Some locations have specific advantages over others in using natural resources to access free renewable energy, for example, Medway has a river that could provide an endless source of energy for district heating systems for all developments within reach of the river. (See appendix: water source heat pumps)

The river Medway is also tidal, and therefore has the opportunity to develop tidal lagoon energy generation systems in conjunction with water-based housing schemes. (See appendix: Housing projects in the Netherlands)

Medway Council area has the advantage of considerable natural capital in the form of agricultural farm land on the Hoo Peninsula. The combination of dense urban developments in combination with arable farmland would enable the waste from each to be used to generate renewable energy by employing 'Pyrolysis' a process of chemically decomposing organic materials in the absence of oxygen.

The Pyrolysis technology not only produces renewable energy but a number of useful valuable by-products. (See appendices: articles on Pyrolysis)

The Medway Estuary also has the natural advantage of being by definition a location where fresh water meets a body of salt water. In the future this could mean that renewable energy could be produced by the process of 'Osmosis'

Redeveloping the centre of Chatham as a cityscape powered by renewable energy is a sustainable option that would provide affordable housing in a vibrant urban setting and eliminate waste and air pollution, while bringing credit and cost savings to Medway Council.

Mrs Catherine Smith

catherine.smith@medway.gov.uk

Please ask for: Gill Harris

Direct Tel: [REDACTED]

Our Ref: [REDACTED]

Your Ref: [REDACTED]

Date: 30 June 2018

e-mail: [REDACTED]

Dear Catherine

Future Medway: Development Strategy Consultation March – June 2018

Thank you for the opportunity to comment on this Reg 18 consultation on alternative development strategies in the emerging Medway Local Plan; and the useful exchange of information between officers at recent Duty to Cooperate and stakeholder consultation events we have both recently hosted on our respective plan preparation.

We note the progress which has been made since our last representation (letter dated 22 March 2017) and the impact of draft new national planning policy and the proposed standard methodology for calculating housing targets.

Nevertheless I would reiterate some of the key points made at that stage:

1. We continue to support the vision and ambitions for a prosperous and thriving Medway and the commitment to regeneration as part of the common theme for regeneration for our part of North Kent. This continues to be important given the social economic and environmental links between the two Councils.
2. We welcome the fact that all of the strategic development options seek to meet the OAN (both OAN previously calculated and the new NPPF national standard methodology versions) within Medway's boundaries, although we note there is a significant estimated shortfall on the latter. We also note that the 2016 based ONS population and household projections may have the effect of revising the Medway target downwards and look forward to hearing how this will affect Medway's strategic planning.
3. We note the progress made on the Lodge Hill issue and welcome the testing of variations on a more modest development option there, which would clearly help relieve pressure on wholly greenfield sites; and alternative strategies which currently exclude it entirely. Whilst there is still significant uncertainty around the feasibility of delivery there, testing these options will add robustness to the process of looking at reasonable alternatives and deliverability of the chosen strategy overall. SBC assumes that this may also offer scope for a hybrid development strategy.
4. We note and support the importance attached to urban regeneration and the focus which has been placed on that in pursuing and maximising the contribution

this can make to meeting development needs in all of the development strategy scenarios.

In respect of the strategic policy issues we would offer the following comments:

Housing Provision: SBC notes and welcomes the fact that Medway has sought to address the NPPF standard methodology derived housing target of 37,000 dwellings over the plan period. However, this is a very challenging figure to deliver and we also note that even with increasing development at urban sites, Hoo and suburban sites, plus allowing employment sites to go for housing, a shortfall of some 1200 dwellings would still result. SBC would question whether the potential for even a modest development contribution at Lodge Hill could assist here. However, we also note that the ONS 2016 based population projections which are alluded to in the Future Medway document, are in fact showing a significantly less extreme growth trajectory for the plan period. We assume that Medway will be following up how this will affect the household projections and hence the standard methodology for housing targets later this year; and result in needs being able to be more comfortably met in a robust and sustainable strategy within the Medway area.

SBC also note and support the inclusion of a consistent windfall allowance across all development strategies for the plan period, which was not present in the 2017 consultation document.

Affordable housing at 17,112 still accounts for some 58% of OAN; and 46% of the NPPF derived total housing target. SBC would question whether the affordable need target would alter with an increased overall target. Whilst the policy targets for affordable housing of 25% in urban areas and 30% in rural areas (all on sites of 15 or more dwellings) appear reasonable, they would not appear to meet the identified affordable housing need (noting that the NPPF changing definitions of affordable housing products may also affect the picture). Although the emerging NPPF now makes no mention of Housing Market Areas, it still contains a requirement that targets may need to be adjusted to meet unmet needs of neighbouring areas. Consequently, SBC's previous comments in respect of the development industry pushing for a higher target based on market signals and the need for a robust response on the realism and overall sustainability of any such claim from the industry therefore still apply.

In terms of Gypsy and Traveller needs, SBC notes that the latest needs assessments are still emerging and that allocation of sites to meet this need may indeed be a necessity for the emerging Medway plan. SBC would also ask that in so doing Medway would be mindful of the significant numbers of Gypsy and Traveller sites which already exist on both sides of the local authority boundary and the potential for further impact on sensitive environmental areas and the need to avoid further fragmentation green buffer between the urban areas of Swale and Medway.

Retail and Town Centres: SBC notes that a retail needs assessment has now been undertaken and the resulting need for 46,000 sq m of comparison floorspace over the plan period to 2031, rising to 70,500 by 2037; plus an increase of 13,200sq m convenience floorspace to 2037. SBC notes that there is no significant change proposed

to the retail hierarchy and that appropriate scale of provision will be required at Hoo. SBC notes however that Rainham East could potentially feature as a new location for a local centre, depending on the development strategy chosen. In the event that this combined with the sequential approach to locating retail provision which could not be met in higher town centres, SBC would wish to see that this would be assessed for impact on Swale centres. Additionally, this could also impact negatively on the A2 corridor congestion and air quality issues and the impact would need to be modelled.

Healthcare: SBC concurs with the consultation document that this is a key concern for many residents across the two areas, with services already under considerable strain. With significant increase in development and resident populations over the plan period, the impact on Medway Maritime Hospital is of significant concern. Swale residents situated to the west of the Borough look to Medway for these services (and those resident in the east to Ashford William Harvey). SBC also notes the NHS Trust has been unable to engage effectively with either of the local planning authorities to date, despite the latter's efforts to do so. Should the relocation of Medway Maritime to a bigger site become essential to meet demand arising from new development, ensuring that this is at a location which can be easily accessed from across the whole area by public and private transport modes will be a significant challenge which Medway and SBC will need to collaborate on with the healthcare providers.

Transport: SBC notes the transport challenges associated with the levels of growth anticipated and looks forward to collaboration on this matter, as strategic testing of development scenarios in both areas commences. SBC notes from the initial transport modelling results (the base 'do minimum' results) shared with officers, that Development Scenarios 2 and 3, with the larger targets and accelerated development do lead to serious road congestion by 2035 and will require major intervention.

Whilst solutions to cope with currently planned development at M2/J5 and the A2/ A249 Key Street are now emerging within Swale, the cumulative impacts of further Swale and Medway growth will need to be tested against infrastructure provision. Issues around the potential for widening the M2 east of Junction 4 will also need to be monitored along with the impact (on both traffic and adjacent Queneendown Warren internationally designated Special Areas of Conservation) of increasing unofficial use of the access at Farthing Corner Services.

The A2 corridor remains problematic, particularly between the A2/A249 junction in Swale to Rainham (and indeed all the way to Rochester), both from the point of view of traffic congestion and impact on Air Quality at the AQMAs at both Rainham and Newington. There is considerable and ongoing commuting between the two authorities which contributes to this and exploration of ways to mitigate this will need to be the subject of ongoing collaboration.

SBC is therefore supportive of a strategy which maximises the opportunity for modal shift by focusing on the regeneration of the urban areas and at Hoo where enhancement in the rail infrastructure could support significant new development there whilst minimising

impact on the highway network. Swale endorses the pursuit of HIF funding to upgrade and reinstate the Grain rail link to passenger status to support this.

SBC is also of the view that development strategies which locate significant new development at the eastern end of Medway, is not sustainable in local transport terms or for London commuting. This is especially the case in view of the enhanced station capacity for High Speed 1 and planned link up to Cross Rail. This has improved the station and increased its importance but has resulted in a reduction in car parking, which is now very limited. However, in view of the improved train service, commuters from the western part of Swale are likely to be more attracted to Rainham in preference to Newington Station and result in additional traffic accessing Rainham station.

Air Quality: SBC notes the ongoing issues with air quality caused by traffic at the AQMA at Rainham and elsewhere along the A2 corridor (also the AQMA at Newington in Swale). Given the limited options for mitigating the impact on air quality along this corridor ahead of major technological innovation, modal shift and minimising the amount of development within the corridor remain the only options for the foreseeable future. This is likely to be a matter for ongoing discussion and collaboration between the two authorities.

Natural Environment: SBC notes the ongoing support for the North Kent Strategic Access Monitoring and Management Strategy in respect of the impact of development on the estuarine Special Protection Areas and ongoing collaboration on this initiative, particularly in the light of recent case law and reviewing the common evidence base of the impact of increased development targets for HRA assessments.

SBC would also reiterate earlier comments in the case of options involving growth to the east of Rainham. In addition to those issues already identified, it will also be important to consider the implications of increased recreational pressures on Queendown Warren SAC where diversionary habitat and recreation provision may be appropriate.

SBC also notes that updating of the 2011 Medway Landscape Character Assessment and a Green Infrastructure Strategy for Medway are also still planned.

Swale would support the comments in respect of the contribution of the orchard landscape east of Rainham to the landscape character and the strategic gap between Medway and Swale (between the Hartlip and Upchurch areas to the Mierscourt Road/Otterham Quay Lane area).

Swale is also pursuing a Green Infrastructure Strategy and this would appear to be another cross boundary matter where ongoing collaboration would be useful to ensure a robustly planned future for this important gap.

Development Scenarios: Given the strategic issues outlined above, SBC would offer the following comments on the Development Scenarios.

SBC appreciates the fact that plan making has had to proceed within a context of national planning policy change and the step change in housing targets which will result from the new NPPF methodology. SBC therefore supports the fact that Medway is seeking to bring forward a strategy which is capable of meeting the 37,000 target which

could result from the NPPF standard methodology, (although that has negative impacts for suburban greenfield land take). SBC notes however, that the latest ONS population projections suggest that the final Medway target may be somewhere between the OAN upon which Scenarios 1, 2 and 4 are based and that for Scenario 3 'worst case'. There is therefore a degree of confidence (at this point in time) that Medway will be able to meet their housing target within the Medway administrative area and SBC supports that.

SBC also supports the fact that all 4 scenarios seek to maximise brown field development through urban regeneration, although noting that this will involve sites with more challenging deliverability in Scenario 3; and could also involve the loss of employment land, which makes the overall strategy more likely to involve out commuting and be less sustainable.

Transport infrastructure is under considerable strain now and with the combined effect of growth in both Medway and Swale will require significant investment to deliver any of the scenarios by the latter part of the plan period.

The proposals under Scenario 2 offer the opportunity to maximise the effectiveness of transport investment in Medway and facilitate modal shift to rail. This in turn is more sustainable given that commuting to London is likely to be an ongoing feature.

Scenario 2 also avoids development pressure on greenfield areas east of Rainham in the gap between urban Medway and Swale and additional pressure on the A2 corridor. Scenario 3 appears to increase the share of dwellings for the Hoo Peninsula, which suggests that there is some leeway here for additional numbers under any scenario, subject to infrastructure support.

Scenario 1 just meets OAN, with a focus on urban regeneration, avoids Lodge Hill, and has more emphasis on suburban greenfields including Lower Rainham. This solution offers less flexibility in terms of meeting the likely final housing target and is less efficient in terms of maximising the impact of major infrastructure investment at Hoo.

Scenario 4 explores the potential for a more modest number of dwellings at the Lodge Hill site (now under the control of Homes England) whilst seeking to avoid the most valuable nature conservation areas of the site. If the dwelling numbers can be achieved, the effect appears to be some reduction in suburban greenfield land take (including at Lower Rainham) and elsewhere at Hoo and Capstone. SBC supports the fact that Medway have sought strategies capable of meeting their housing target without the reliance upon the strategic contribution which Lodge Hill previously made. If anything can be achieved here, it therefore now allows most functions as a 'bonus' which could increase the robustness of other strategies, rather than being a key element of one strategy.

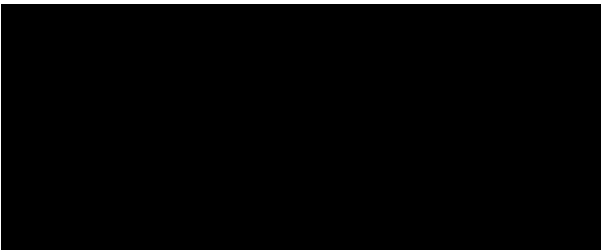
SBC is therefore of the view that Scenario 2 offers the most flexibility in terms of meeting housing targets; maximising the potential for new infrastructure and modal shift; locating development in the most sustainable location to address London commuting; and taking pressure off sensitive greenfield locations; and has least impact on congestion and air

quality issues affecting the A2 corridor. Elements of the other strategies, notably Lodge Hill still have the potential to supplement it, should the need arise.

Going forwards, SBC notes that transport, housing, environmental issues; air quality; and possibly retail issues are likely to be topics which will require an ongoing cross boundary perspective.

I hope these comments will be of some use and look forward to further discussions with you as both our plans progress.

Yours sincerely



Gerry Lewin
Cabinet Member for Planning &
Deputy Council Leader

maryott, kyle

From: [REDACTED]
Sent: 26 June 2018 15:45
To: futuremedway
Subject: Future Medway Local Plan

Categories: Blue Category

Dear Sir or Madam

Re: Future Medway Local Plan

Newington Parish Council has concerns about the number of proposed developments in the Rainham area within the plan. These proposed sites will increase traffic along the A2 through Newington. The High Street (A2) in Newington is part of an AQMA. The UK is failing to meet the limits set by the EU and will be faced with fines if Air Quality is not improved by 2020. The Parish Council is concerned that these proposed developments will increase problems of Air Quality (pollution) in Newington and, in view of this, needs to question if these developments should proceed. If the development should go ahead Medway Council should set aside some of the section 106 monies to help mitigate the effects of the increased traffic the developments will cause through Newington. We feel the Council needs to pay due regards and give weight to the Gladmans Case Appeal Ref:APP/V2255/W/15/3067553 - <https://cprekent.org.uk/wp-6///uploads/2017/01/3067553-and-3148140-appeal-decisions.pdf>. We note that Medway Council had expressed concern about this development and that the MP for Gillingham and Rainham opposed the proposed (now permitted) building of 124 homes off the A2 in the Village on grounds of likely further harm to air quality in the Rainham AQMA

The Council is further concerned that the increase in housing in the Rainham area will cause an increase in the volume of traffic on the already very busy A2 from Rainham to Key Street, this section of road is currently at capacity and this point was made by the Governments Inspector who assessed the Swale Borough Councils Local Plan which was adopted in 2017.

People from Newington use services in Medway such as schools, doctors and the Medway Maritime hospital, and Newington Parish Council feel that these will be stretched even further and will have a direct effect on the quality and wellbeing of our Parish residents.

Kind regards

Wendy Licence
Clerk to Newington Parish Council

[REDACTED]

This email is sent to you IN CONFIDENCE.

Comment to latest phase of the local plan

This is my comment to the latest phase of the local plan not only my thoughts and comments but also thoughts and comments of residents in Strood Rural Ward I have spoken to in a more informal setting.

Most people except that more houses are needed , but think that the bulk of the proposed developments seem to be centred around Chattenden and Hoo area and that it should be shared more evenly throughout all of Medway and provision must be made for local people and be affordable and sustainable.

With the population of Medway ageing, more provision needs to be made for Sheltered/supported accommodation in the Plan.

The A228 is the only main road off of the peninsula and I think a new road with direct access to the Wainscott By-pass would help to relieve the already congested Four Elms hill and the delays already experienced through Wainscott to the Medway City estate and beyond and to help improve the pollution around this area, Four Elms is already a AQMA. It would also give us another way off the Peninsula if a major incident occurred on the A228. The whole of the local road infrastructure needs careful planned before any houses are built.

With the planned expansion of Hoo I think feasibility study could be done on bringing the railway network to Hoo with a new Railway Station being built.

This could help commuters working outside Medway get on to the rail network and help to ease the traffic congestion in the area the new developments would bring.

Residents are concerned about effects of new developments would have on the already under stress doctors surgeries and provision needs to be built in to the Plan to alleviate this problem. There has been a problem recruiting GP'S

to the area. It has been suggested that a New Health Centre could be built on the peninsula to help

Major investment would needed to be made in to Medway Hospital to help it cope with the growing population that the proposed house building in the local plan would bring.

We need to protect our greenspaces and farmland and we have many sssi's

In the area and the impact on these from the proposed developments must be kept to a minimum and wildlife must be protected. Consideration should be given to the forming of a Nature reserve/country Park on the site at Lodge Hill or Deangate Ridge which could be of benefit to the whole of Medway.

It must be noted that Medway Planning Policies have designated Deansgate Ridge an Area of Local Landscape Importance as follows:

3.4.107 iii) – “DEANGATE RIDGE. Location and character – High ridge with a diverse landscape of woodland, agriculture, orchards.

Development within an ALLI should be sited, designed and landscaped to minimise harm to the areas landscape character and function

There is also support from local residents to resist any building on lodge Hill to help protect the SSSI and to protect wildlife I have received dozens of email's in support of Lodge Hill.

The general feeling is that there will be an over development of the area and a major upgrade of local infrastructure and services would be needed .

Also that Greenspaces and SSSI's should be protected and that scenario 4 risks harming flora and fauna in those areas.

This by no means a result of a full survey but a precis of comments and suggestions I came across in more informal conversations with local residents added to a few comments suggestions of my own to help you get a feel of public opinion to compliment the consultation you have already undertaken.

Kind Regards

Cllr John Williams

Member for Strood Rural



Cuxton Parish Council: Response to Medway Council Local Plan: Future Medway

Cuxton Parish Council appreciate the work that has gone into the next stage of the Local Plan Development. As with previous responses, Cuxton Parish Council has provided a specific response to the consultation document as it applies to Cuxton. Areas have been considered in order of relevance to Cuxton rather than as laid out in the consultation document.

General remarks

There remains a lack of any clear strategic plan to manage the growing traffic congestion on the A228 that runs through Cuxton. This is of particular concern to Cuxton Parish Council as residents continue to find it difficult to safely exit the village at peak times.

Plans for managing traffic from the proposed Lower Thames River Crossing, St Andrews and Temple Wharf development and St Peter's village are not clear and should have been in place and funded before the Temple Wharf development commenced.

The promised traffic lights at the junction of Bush Road and the A228 have repeatedly been stalled. The 106 money from the St Andrew's development at Halling is the only compensation Cuxton residents have been allocated to compensate for increasing traffic, but even this seems to be in jeopardy.

The proposed river side cycle route created by the re-routing of the RS207 no longer goes anywhere near the river at Cuxton. It was recently brought to our attention that the route does not go down to the Medway Valley complex until after the motorway bridge. Somewhere in the Medway planning process the promised access through the tunnel under the railway to the original footpath around the lakes has disappeared. This is really disappointing given the commitment Medway Council have to riverside access for ALL.

Bus lanes and cycle routes should form part of this plan along with a clear map indicating where the riverside public access will link, so that it is not just a piecemeal plan that is available to residents of new developments, but does not work for the wider community. This work should be the foundation on which the Medway Council plan is built.

In addition, there is specific concern about the lack of planned school places and health facilities such as GPs and pharmacies to support any small, medium or large scale housing development along the section of the A228 between Strood and the M20. Without such essential facilities the community cannot function successfully. A pharmacy would be welcomed by many Cuxton residents, but applications for one to be established in an empty shop in Cuxton have been turned down reportedly because it does not appear in the Medway Plan.

Effective transport networks

There is nothing in this next stage in Local Plan development that suggest a move to address the current and potential road infrastructure problems.

Duty to co-operate

Opportunities to obtain some financial compensation for villages like Cuxton do not appear to have been offered. There was no invitation to engage in the 106 agreements for Medway Gate or Temple Marsh. Over 40% of the children at Cuxton Academy of Schools come from Medway Gate and Strood East. This amounts to at least 300 car movements in and out of the village during term time. In addition, a new nursery is opening for 30 children; many of whom will only do part-days. This has the potential to increase car movements by at least 60/day if all the children attend all day. It is unfortunate that Medway Education and Medway Highways do not appear to work together to ensure that the money from 106 agreements take account of what changes are happening in local areas.

Development that reduces flooding

Cuxton Parish Council were pleased to see that no housing development has been identified for the land known as Cuxton Gate. As it forms part of the flood plain that protects Bush Road from flooding any development of this site would place this area at increased risk.

Maintain distinction between towns and villages

Cuxton Parish Council wants to see the green spaces between Cuxton and Strood and Cuxton and Halling maintained. We do not wish to be absorbed into an urban sprawl.

There are some significant needs in Cuxton that require funding, and which Cuxton Parish Council needs Medway Council to include in future 106 agreements.

1. Funding a village hall; Cuxton has no village/community hall.
2. Funding for development of the recreation ground (MUGA & parking to ease problems of pavement parking on Bush Road)
3. Funding to support Riverside walk along diverted RS 207 that does actually provide access to riverside
4. Monitoring of air pollution on A228 at Cuxton

Daniela Baylis

Parish Clerk,

On behalf of Cuxton Parish Council

25/06/2018

22/08/2018



Our Reference: SEW Ref MedwayLPR



Tom Gilbert
Senior Planner-Policy,
Medway Council,
Gun Wharf
Dock Road
Chatham
ME4 4TR

Dear Tom Gilbert

Medway Local Plan Consultation

South East Water (SEW) would like to thank Medway Council for contacting us regarding your Local Plan.

SEW is the service and infrastructure provider for supplying water to, a small part of, Medway Council's total administrative area, with Halling and some of the surround area falling within the boundaries of our Water Resource Zone 6.

Having studied your proposed plans at this stage we would like to confirm that we are able to comfortably facilitate the proposed increase in property within this area as it falls well within our current plans as laid out in our WRMP (a revised version of our latest plan WRMP19 will be available from Friday 24th August).

In line with statutory guidance, our planning takes full account of the planning forecasts of Medway along with other Local Authorities within our region. All Local Authorities were contacted and from their responses a comprehensive forecast, developed by Experian, together with neighbouring companies, of growth estimates in population and households was developed. We review these figures annually and update the overall forecast every 5 years when we update our plan. Therefore, we encourage you to continue to work with us to ensure the most accurate figures are included in the numbers we use for forecasting.

We have completed sensitivity testing on our plans and can assure you that in the context of our current water resource plan, we are able to confirm that our published planned programme will be fully able to satisfy the growth in demands in the zones. There is also a buffer within our forecasts (known as Headroom) to allow for any unforeseen growth should it arise.

As only one of your area providers, we would like to ensure you have also contacted Southern Water with regards to both your water supply and waste water.

Rocfort Road
Snodland
Kent ME6 5AH

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water@southeastwater.co.uk

WEBSITE
www.southeastwater.co.uk

South East Water Ltd
Registered in England No. 2679874
Registered Office: Rocfort Road, Snodland,
Kent ME6 5AH
ISO 9001 Certified
ISO 14001 Certified
OHSAS 18001 Certified
South East Water is an Investor in People

SEW also acknowledge your plans to promote the BREEAM Very Good standard for water and energy and would like to encourage you to ensure this is maintained through to the final plan. We also appreciate the efforts and aspiration to achieve and reduction to 100L pax/day and 90L for larger developments. This aligns itself well with our WRMP19 and we are available for support should you wish to work with us in achieving.

SEW would however like to take this opportunity to reiterate that our principle concern is the water that we abstract and treat for public supply purposes while ensuring that surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators.

Moreover, SEW would like to ensure that any applicant carrying out activities within a groundwater source protection zone should follow and comply with the Environment Agency's approach to the management and protection of groundwater as outlined within their Groundwater Protection Position Statements and take all measures and precautions necessary to avoid deterioration in the quality of groundwater below the site. This is particularly important around Halling as much of the area comes within level 1,2 or 3 protection zones.

South East Water would like to be kept updated with any developments with regard to this application and looks forward to working with Medway Council, and the Environment Agency to ensure that drinking water supplies remain protected in the area in the future.

Yours sincerely,

James Daly
Water Resource Analyst
South East Water

Cc, Helen Chapman, Supply Demand Manager, South East Water
James Wilkinson, Graduate Hydrogeologist, South East Water
Iain Murrell, Technical Specialist (Water Resources), Environment Agency

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