

maryott, kyle

From: [REDACTED]
Sent: 04 April 2018 05:03
To: futuremedway
Subject: Medway planning

Categories: Blue Category

Good morning,

When we moved to Hoo, we chose this area because it was still quite rural there was plenty of grassland around and felt that you were in the country.

Now all you see are new homes being built, and once finished we will have more homes than the surrounding areas. What makes you think that people living in Hoo are happy about this? Have you given any thought to what residents say?. I know there have been meetings but you still go ahead with the building.

There is only one way in and out of Hoo so I would really like to know how you think the infrastructure will cope. It only takes one accident and we are unable to leave Hoo and you have a long wait to get out. The bus service is absolutely disgusting it's actually a disgrace the money we are charged, and the service provided is deplorable they cannot cope now what will they be like with more people wanting the bus. If the residents of all these new builds have cars that's more pollution and more cars on the road, at a time when you want more people to use public transport.

The doctors cannot cope you either have to go and sit in the doctors for an hour to be first in the queue and hope for an emergency appointment or you phone up and get an appointment three weeks later.

Building more homes in a place that hasn't got the transport, doctors or infrastructure is ridiculous you are not putting more money into these areas so please advise me how we will cope.

We don't want more homes here, I lived in a built up area with all your building it looks like we will have to move again.

V Young

Sent from my iPad

MEDWAY COUNCIL LOCAL PLAN 2012-2035

LAF NOTES ON CONSULTATION DRAFT

Vision & Strategic Objectives

2.5 Medway is an Unitary Authority not the largest City in Kent.

3.2 Developments planned for Hoo St.Werburgh, Chattenden and Deangate.

Residents had no chance to save Deangate!

Chattenden developments have begun already!

3.27 Hoo St.Werburgh will become a town!

3.28 All traffic will have to come through Strood!

3.42 Upgrading railway to include passenger traffic. Who is going to pay for this? Investment in the bus network and a new station!

3.45 Development at Hoo would save Capstone Valley and North Rainham from Development. Strood would pay the price with even more congestion on our roads.

3.49 The loss of commercial land to housing means less local jobs and more commuting elsewhere.

3.53 Homes England is proposing a new development at Lodge Hill. Ancient woodland and land to the north-east of the site would remain undeveloped.

3.56 Hoo rural town could have 2,000 homes, primary school, 29 hectares of public open space, mixed use facilities, for community uses, small shop units and commercial land!

Policy DS2 p.36 Chatham will provide the focus for new retail and community facilities? Hoo St. Werburgh will become a small town. The Council will consider developments around Rainham, Capstone, High Halstow, Lower Stoke, Allhallows, Grain and Halling.

HOUSING

4.3 The local Plan needs to provide for 29,463 new homes!

4.4 17,112 affordable homes are needed over the plan period. Hoo could provide homes for different groups in society

4.8 A mix of types of housing cannot be delivered in practice if it would be harmful to a heritage asset?

4.9 Welfare reform could increase the number of people under 35 looking to rent and may have impacts on the housing market.

Policy H3 Affordable housing provision: rural Medway 30% on 15 or more and urban Medway 25% on developments over 15 dwellings. These should be integrated within developments, but the Council may consider off site provision where other policies objectives can be met and 106 monies are provided?

4.22 Over the next 17 years the number of over 65's who need some form of care, will rise by 63%.

Policy H4: Should the Council promote the development of retirement villages, supported housing or residential homes?

Policy H6: Mobile home sites will be protected from development plans but must adhere to latest Model Standards.

EMPLOYMENT

5.5 Medway has a slightly higher proportion of micro enterprises and fewer medium and large businesses.

5.8 Hoo could provide sites for businesses to make use of rail and water based freight transport

5.10 The Council supports opportunities for modular construction factories in employment sites like Kingsnorth.

5.18 The Council recognises opportunities around Chatham, Gillingham and Strood. Development of Hoo town could provide new employment complimenting sites at Grain and Kingsnorth.

RETAIL & TOWN CENTRES

6.5 Chatham is seen as the main shopping Centre?

NATURAL ENVIRONMENT & GREEN BELT

7.9 The Council is updating the Medway Rights of Way Improvement Plan for publication in late 2018.

Policy NE5: The Council **will consider** the need to protect the special features of Regionally Important Geological Sites, Local Wildlife Sites & Local Nature Reserves. **Surely they should protect not merely consider.**

Opportunities will be sought to promote and enhance the public rights of way network, including footpaths, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside.

7.27 If exceptional circumstances existed the Council would justify a revision to the Green Belt boundary in Medway.

7.37 Where an air quality objective has not been met the planning authority must declare an Air Quality Management Area and put in an action plan to bring pollutant levels below the objective.

HEALTH & COMMUNITIES

9.5 Obesity levels in Medway are above average.

9.9 Many local people have asked that the Local Plan looks at identifying a site for a new hospital. Has this been done?

Policy HC1: The Council will seek to investigate the redevelopment of the present Medway Maritime Hospital. If deemed necessary the relocation, or partial relocation of some services to a new site within Medway will be considered.

INFRASTRUCTURE

10.4 There are infrastructure deficiencies in many areas.

10.6 The Council is producing an infrastructure delivery plan to sit alongside the Local Plan.

10.19 The Council supports early engagement with water services to plan strategically for growth as set out in the Local Plan.

10.26 Open space and sports facilities should be protected but Sport England can override if the development meets one or more of five specific exceptions. This is what happened to Deangate Ridge, as it is included in the Local Plan.

10.29 Medway has a shortfall of open spaces for sport save for parks surplus in Chatham & Rainham. Strood and the Hoo Peninsular has lots of natural greenspace?

TRANSPORT

11.3 The Coastal path will run along the land to the south of the Medway Estuary and around the Hoo Peninsular.

11.4 The LTP is supported by the Cycling Action Plan and the PROW improvement Plan.

11.12 Any new rail franchise will be required to trial Pay-as-you-Go ticketing such as Oyster-type card or contactless payment cards.

11.17 The development of Hoo will depend on upgrades to transport.

11.19 A rail connection to Grain would relieve local congestion and improve employment opportunities.

11.20 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.

11.35 The Council supports the potential for new services on the river. The introduction of a new river crossing could facilitate the use of Medway Tunnel for pedestrians and cyclists?

Policy T6: Waterfront developments will incorporate public space for walking and cycling.

11.40 There is potential for growth to facilities for visiting vessels.

From: [REDACTED]
Sent: 07 April 2018 15:20
To: futuremedway
Subject: In my humble opinion...

Categories: Blue Category

To whom it may concern,

I was born at All Saint's Hospital in 1968, and have lived in Medway most of my life. So I've seen the changes in Medway over the years. As I have 3 teenagers currently living in Medway, i feel I need to have my say, during this consultation phase.

I work as a Manager in the Construction Industry, so am aware that making large scale changes and improvements to an area, do not happen overnight. In my opinion, most of the changes have been noticed recently, since the HS1 rail service impacted on Medway. I know the plans for all the waterfront developments all around Medway, have been in the pipeline for a long time, and enabling works for all these schemes have already occurred over a decade ago, and beyond.

A couple of things that I would like to comment on briefly, are in relation to building houses:

- 1) SMEs should be given more opportunities to build the smaller developments that the Big Developers are not interested in. This will help Medway Council meet it's targets for annual housebuilding. When permission is granted for such developments, a realistic date should be set of when the development will be complete. This will prevent Developers of any size, Land Banking plots of land, that other developers may be ready to build on.
- 2) The way people live currently has also changed considerably over the years. Not everyone wants a 2up 2down dwelling. One size does not fit all ! It should become easier to build and/or convert existing buildings into co-living spaces like hmos or equivalent.
- 3) When granting planning permission, I know that parking provisions for the occupants of a building are high on the list of conditions. I feel this needs to change, as less people are learning to drive (especially the millennials). Autonomous vehicles will soon be disrupting this state of affairs. Medway Council should instead be promoting cycling, as a real transport alternative, with green and health credentials ! For this to happen, we need to create a cycle superhighway (similar to London) that is segregated from motor vehicles and buses etc. This would make it a safer mode of travel for all the family. This needs to be incorporated now into the Medway Local Plan.

Thanking you in anticipation.

Kind regards,

Mr Harkamal Dale
[REDACTED]

From: [REDACTED]
Sent: 08 April 2018 12:12
To: futuremedway
Subject: HOO PENINSULA - LOCAL PLAN

Categories: Blue Category

Hi

I object strongly to your proposals to concentrate development on the Hoo Peninsula.

It is the last chiefly rural site in Medway and Medway Council should be doing its utmost to retain the rural aspect of the area, instead of doing its utmost to annihilate the green and lose the villages within a massive and ugly urban conglomeration.

Building an additional 30,000 homes on the peninsula will increase the population by an estimated 90,000 persons. There are just over 21,000 residents at the moment. Your plans mean that for every 1 resident today, there will be almost 6. Already services on the peninsula are stretched to breaking:

Schools are full

Doctors are full

Roads are over crowded. There are already too many cars in Medway for its roads. This will just make Medway and the peninsula into one vast traffic jam.

Being a peninsula means that there is only one access route, and whenever there is an accident anywhere in the Towns, traffic soon blocks that road, and using the Wainscott roundabout and the 4 Elms roundabout becomes impossible, traffic coming to a standstill. Delays can easily stretch to over an hour. And that's with just 21,000 residents, with 6 times the number of residents using 4 Elms Hill, there will be perpetual traffic jams.

Priority at both roundabouts is not for local traffic but for traffic heading between London and the coast. Residents already have problems using these roundabouts, there will be chaos when traffic increases, and not increasing just by a factor of 6, but there will be additional traffic as the plans include industrial and business areas too.

If your plan goes ahead, traffic problems on the peninsula will be worse than the Medway Towns' already notorious blackspots - Chatham Railway Station, Medway Tunnel and Rochester Bridge. It will bring utter misery to residents.

Public transport on the peninsula is already poor. Buses are late, overcrowded and unreliable. A bus from Hoo to Chatham already takes an hour, and if traffic is bad, much longer. You only need look at Arriva's FB page to see the vast number of complaints about the 191 service. 15 minutes late is normal. 30 minutes is not unusual. Cancellations are frequent. Passengers standing from Hoo to Chatham is normal. The 191 bus route meets all the blackspots in the Towns, and therefore cannot currently run to the time-table. It is already a lost cause, it will never cope with 30,000 additional homes, plus additional streets, plus additional bus stops, and new routes, not forgetting possibly 6 times the number of bus passengers.

And what of resources like water? Will there be enough water for 90,000 additional persons?

The Hoo Peninsula has a older population than the average for the Medway Towns and a lower crime rate. 90,000 newcomers, mostly from London, judging by residents who have already moved into the new housing estates, will bring a drastic change to the demographics of the area, and not for the better. Crime has already increased, from anti-social behaviour, to car crimes, drugs and gangs.

A few years ago, the social housing estate in Chattenden was almost exclusively for Londoners, and it became a virtual no-go area, the police were called night after night, to fights and stolen cars being set on fire. This is what will happen to Hoo and the other villages.

The Peninsula will change from a rural area with some outstanding views hosting rare wildlife to an urban crime area worse than Chatham.

And what of pollution? Industrial areas surrounding the villages are going to bring additional traffic problems and industrial waste, polluting the land and air for humans and for wildlife. At the moment there are is a bird sanctuary here and rare species of birds and plants thrive on the peninsula, they won't survive the pollution than industrialisation brings.

There is nothing good about this plan for the peninsula. For residents, it's a horror story. Not to mention the disturbance during the building phase. Already Bells Lane is closed because Bellway contractors can't dig a tunnel under a road safely.

This entire plan is nonsense and must be abandoned. The Hoo Peninsula is a rural area and that status should be protected. The government has a commitment to preserving what little is left of the countryside. Finally, the Hoo Peninsula cannot support an additional 90,000 residents. End of.

From: [REDACTED]
Sent: 22 June 2018 19:51
To: futuremedway
Subject: LOCAL PLAN

Categories: Blue Category

Your plans to concentrate Medway's development on the Hoo Peninsula are insane.

I live in Hoo and tonight it took me 90 minutes to get home from Chatham. There are already too many people living here. The journey on and off the Peninsula is a night mare. Four Elms Hill is often at a standstill and getting onto the roundabout is almost impossible.

This is a rural area. It's your responsibility to protect rural areas, not swamp them with housing developments. In recent years there has already been unprecedented building on the Peninsula and a massive influx of Londoners, changing the entire nature of the Hoo villages, and not for the better.

It has to stop. The schools are full, the doctors are full, the buses are full and travelling on and off the peninsula is a big headache.

From: [REDACTED]
Sent: 09 April 2018 12:32
To: futuremedway
Subject: Draft local plan

Categories: Blue Category

Sent from my iPadDear Sir/Madam

Re: DRAFT LOCAL PLAN

I am writing in response to the content of Medway Council's latest draft Local Plan wherein there are plans to allocate large areas in or adjacent to Lodge Hill a Site of Special Scientific Interest (SSSI) for housing.

This proposal would not only signal the end for wildlife meant to be protected there but most importantly most of Lodge Hill's nightingales. I would remind the Council that this is one of the Britain's most threatened birds and, as such, is Red Listed having declined by over 90% in the last 50 years.

If Medway Council also need to be reminded:

- National planning guidance from the Government is clear: **it is the duty of a local authority to seek to avoid allocating land for development that would have an adverse impact on SSSIs.**
- Under the National Planning Policy Framework, local planning authorities should **aim to conserve and enhance biodiversity and should seek to avoid harmful impacts on protected sites.**
- Development should **not happen on land within a SSSI or next to it where it will cause an adverse impact.**

Clearly the overall aim of the National Planning Guidance is to ensure the planning system allows land to be used for new homes and jobs while **"protecting valuable natural and historic environments"**.

Given all of the above it follows that the Lodge Hill site of Special Scientific Interest (SSSI) should **NOT** be included in the development options in Medway Council's Local Plan, either the SSSI or a buffer zone around its boundary, in order to protect the nightingales, other wildlife and ancient woodland.

The inclusion of Lodge Hill, which is a nationally important area of ancient woodland and rare grasslands, would set a very dangerous precedent, weakening the protection given to SSSIs across the whole of the country.

I and others care about the future of Britain's wildlife especially Lodge Hill's nightingales and other protected wildlife. The site is a rich mosaic of many habitats and is home to several badger families, several species of bat and many bat roosts. There is an exceptional population of reptiles – including lizards, slow worms, grass snakes and adders – great crested newts, toads, rare insects, flowers and invertebrates. There are many bird species there too – including three species of owl.

In conclusion might I suggest that, as part of their housing policy, Medway Council look closely at the number of empty properties in their catchment area? Old fashioned as it may be there is a lot to be said for good housing management.

Judy moore

From: [REDACTED]
Sent: 09 April 2018 21:06
To: futuremedway
Subject: Medway Local Plan

Categories: Blue Category

Dear Medway Council,

You have invited me to have my say regarding Medway's Local Plan and I know it will make no difference to what I or any of the other Medway residents want, but here are my requests as a Medway Resident.

As a Council, the Councillors are duty bound to represent the requirements and wishes of it's residents and not to put forward a housing plan that they think is correct and goes against those wishes without proper community involvement.

In particular the bias weighted amount of houses that are being proposed for the Hoo Peninsular and the concreting over of open green leisure spaces like Deangate Ridge in order to achieve this. The proposals are not sustainable and given the recent track record of housing estates built on the Hoo Peninsular in the last twenty years, do not provide the required infrastructure like correct road design, doctors surgeries, dental surgeries, leisure facilities, etc., etc.

Whilst I understand the need for new houses to be built, those built around the villages on the Hoo Peninsular should be small scale and gradually introduced over the coming years up to 2035.

Consultation and subsequent design should include input from and agreement by all members of the community, not just the councillors. This is not what I voted for.

So with this in mind, I would ask you to scrap the current proposals and involve the residents in creating an agreed and sustainable plan.

Thank you.

Stephen Driver.

From: [REDACTED]
Sent: 12 April 2018 12:25
To: futuremedway
Subject: Development strategy technical report consultation

Categories: Blue Category

Herewith the comments of Hartlip Parish Council on the above consultation:

Question DS1

Hartlip Parish Council (HPC) is supportive of the Council's approach to designate enough land to meet its housing needs in order to avoid speculative development on greenfield sites.

HPC supports making the most efficient use of brownfield/previously developed sites and prioritising the development on these sites first.

The Council is requested to give careful attention to the suggested expansion of Rainham. HPC would wish to protect the current separation between Rainham and the neighbouring village of Hartlip to the east. The countryside between the two settlements should be protected to prevent an amalgamation of built development. The landscape between the settlements should be protected.

In light of the above comments, the draft Proposals Map illustrating scenario 3 would be harmful to that separation, with the allocation of great swathes of countryside to the south-east of Rainham, and would be objected to by Hartlip Parish Council..

Very careful consideration should be given to the extra traffic which any proposed development might bring to an already heavily congested A2 and the effects on already poor air quality in already badly affected areas. Fly tipping in the area is endemic and has a high cost to the Local Authorities concerned. There are already very heavy pressures on GP waiting lists and on hospitals and schools in the area and these are all matters which must be carefully considered.

Question H20

Hartlip Parish Council is impacted by considerable traveller and gypsy encampments within and surrounding the Parish, with many illegally sited caravans and associated domestic paraphernalia. Neighbouring the parish is the area of Matts Hill Road which has seen a significant change in recent years - with the destruction of wooded areas and the proliferation of gypsy sites, changing the character of the area considerably from a rural idyll within the AONB, to a suburban sprawl of mobile homes, hard surfacing, high fencing and gates. The Spade Lane development (within Swale), to the west of Hartlip along with a large number of other sites within the area has also significantly impacted upon the landscape and the wellbeing of residents local to the site.

In light of this proliferation of gypsy encampments affecting the rural area within and surrounding Hartlip, the Parish Council's view is that the draft policy H10 is not strongly worded enough in order to avoid the negative impacts of such developments within the rural area. The Local Plan policy should state that such developments should not be supported within the rural area, especially where there would be landscape and other impacts.

Question NE4

The Parish Council considers that draft policy NE4 is not strongly enough worded to prevent developments which could detrimentally affect the landscape character of the rural parts of the Authority area. Greater protection should be afforded to the rural area - proposals should preserve and/or enhance the landscape

Graham Addicott OBE
Chairman of Hartlip Parish Council

maryott, kyle

From: [REDACTED]
Sent: 13 April 2018 09:10
To: futuremedway
Subject: Consultation of draft local plan

Categories: Blue Category

My Opposition Stance over building on the north side of the Upper Saxon Shore Way Hoo (identified as 1065a in draft Local Plan)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

-

The Upper Saxon Shore Way is one of Medway Council's circular walks (walk 1) which they have a duty to protect and maintain. This includes a short section of Public Right Of Way that excludes the churchyard to shorten the route. The area of land between the PROW(1065a) and Main Road has been identified in the draft Local Plan for development. I believe it is most important to keep this land as Status Quo. A couple of views of proposed development area from the Upper Saxon Shore Way:-



Important bullet points:-

- 1) **The council has identified land to the south of Main Road from Vicarage Lane westwards as ALLI (Area of Local Landscape Importance). (2008-2016).**
- 2) The USSW runs through a working farm which gives a rare opportunity to sample farmland being worked on throughout the year. Crops range from oilseed rape, asparagus, coriander, wheat, peas, sunflowers, and even daffodils.
- 3) The PROW starts at Vicarage Lane and consists of a tarmac farm track.
- 4) **This is the only example I know of locally that allows public access for disabled people to easily see the countryside, working farm, and extensive views of the estuary, and bird life, being, for most part, tarmac.**
- 5) **I have seen groups of accompanied school children also using this route, which is very close to HOH school, to further their education.**
- 6) Even building on one side of the important Upper Saxon Shore Way will destroy most of the value of a PROW providing access to the countryside. Whatever method of screening was deployed a large estate of housing would still be detrimental as there are some very attractive views still to be seen from the PROW looking northwards.
- 7) The land either side of the PROW is also important to maintain status quo for other reasons.
 - a) **Paragraph 112 of the NPPF advises that account should be taken of the economic and other benefits of the best and most versatile agricultural land At least parts of it have been tested and found to be grade 1 agricultural land.**
 - b) More farmland is needed, not less, to help feed the growing population.
 - c) The farm does not appear to be dependant on large amounts of foreign labour.
 - d) Hoo has already recently lost many of its sports facilities against government policy including football and cricket pitches and many more sports facilities with the decision to close Deangate Sports Centre. There is a football pitch near the existing allotments which, until recently, was used by young footballers. This should not be destroyed and it would be most unsuitable if it was overlooked by housing with young children around.
 - e) **If the land to the north of the PROW is filled with housing it will effectively put a stranglehold on the old village centre** as it would become almost entirely enclosed by new developments. For whatever reason, the local plan has been grossly delayed, which has allowed small developments to be tagged on without any proper planning policy. These are especially damaging south of Stoke Road, not only to the visual effect but causing damage to the environment besides problems with rainwater and sewerage. There was a problem a few years ago when one of the old water mains burst and entered the gas supply whereas I and many others were without gas for 3 weeks. Since then there has been several examples of infilling of houses in the old part of the village.
- 8) Obesity has reached such proportions to become a national concern and is now a crisis. Old people rambles, Joggers and dog walkers etc. use this PROW.
- 9) **This is also a rare example of a PROW that can be used even when the weather is inclement.**
- 10) There has already been one instance where the PROW has been pierced by a housing development near Chattenden where a road has to be crossed creating potential danger.
- 11) When the tide is high this route is the only walkable route to Upnor through countryside from the Vicarage Lane/ village centre area.

12) In recent times people from all parts of Medway have been coming to look at the beauty of the daffodils and, last year, the sunflowers that lined the edge of the farm track along a considerable length of the PROW.

13) the council themselves have outlined the importance of the rural nature of the Cockham ridge as a backdrop for Gillingham and St Mary's Island.

14)) **I believe there is very little financial burden on the taxpayer as most of the PROW is maintained by the farmer.**

15) A large quantity of further housing close to Cockham Wood is bound to have a detrimental effect on this SSSI site and also the nearby RAMSAR site.

16) The general disturbance to birds of building on the peninsula will even adversely affect Riverside country park at Gillingham it has been reported.

17)The council put forward objections to developing Capstone Valley. Those objections should be applied equally to development here. In fact I think there is a stronger case here on the grounds of access to London for instance. The council have previously stated that the upgrading of the Wainscott By-pass would be prohibitive. The access to the emergency hospital is far worse this side of the river. At the present time there are many accidents at 4 Elms Hill and roundabouts and Medway tunnel. Any improvements in the pipeline will only keep up with the already increasing traffic. The blockades to the other side of the river will continue. Traffic to all the services located the other side of the river will only get worse.

18) Rainwater soakaways are a recent problem at my property close to the church. Apparently soakaways further up the road can affect mine so that the water does not soak away causing our garage to be susceptible to flooding.

19) Building here would result in a high dependency on car travel as it is not a sustainable location. Despite what developers quote about people using public transport, bicycles and walking, most people still use a car to go short distances. A lot of the households from this proposed development would more than likely use the present village facilities i.e. The Village Institute, Village Hall, and pubs and shops. Even now the village shopping centre sometimes resembles the centre of a town with it's traffic levels and the three car parks are often at capacity. Recently, when the top Bell's Lane was closed for an extended period, the village centre was grid locked on occasions.

sources: Wildlife_strategy_08-4 Page 39, 40, and 41 as set out by Councillor Doe.
NPPF (National Planning Policy Framework)

From: [REDACTED]
Sent: 26 April 2018 15:37
To: futuremedway
Subject: Consultation Draft Local Plan for Medway

Categories: Blue Category



My Comments to the Rural and Tourism elements of the proposed local plan 2012-35

I disagree with the council's proposal to convert the Village of Hoo St Werburgh into a rural town and put forward my own proposals for the future city.

The main reasons against the new town are:-

- 1) local residents were not consulted on the destruction of their village. Their concerns about the piecemeal development around the village have been ignored.
- 2) There are large areas of grade 1 farming land on the Hoo Peninsula. The proposed housing developments will destroy this. Most of the land is also ALLI designated. (Ref 5.24 consultation document:- Where significant development of agricultural land is demonstrated to be necessary, councils should seek to use areas of poorer quality land in preference to that of a higher quality.). There are also SSSI sites where nightingales will flourish if allowed to.
- 3) The traditional way of rural life will be altered forever. This is forcing thousands of residents to live in a town against their will.
- 4) The whole Peninsula is an asset as it is with its many unique environmental features and historical military constructions. The council has always preferred to put our money into historical features on the other side of the river.
- 5) The council continue to ignore concerns about underground springs and similar surface water problems. Putting housing on the upper slopes are almost bound to cause problems in the village centre and around the church with soakaways filling up etc. This is against government guidelines.

6) With all of the predatory building projects in and around the parish which amount to over 820 extra dwellings I feel we have done more than our fair share of housing contribution with very little improvement done to local facilities.

7) The view from the many high points of the Medway Towns would be of thousands of houses instead of beautiful countryside.

As the policy is to build on less valuable land as noted above, the logical conclusion would be to build on areas around Capstone Valley and other smaller areas in the urban area of the Medway Towns with less valuable land.

The advantages of this would be:-

1) The farmland is grade 3.

2) There is a thriving shopping centre not far away at Hempstead Valley and a bit further down Hoathway, Gillingham Business Park with many large retail outlets, a skating rink, medical facilities, vets, and much more, and a large Tesco and garden centre on the other side of the road. This area alone is the size of Hoo St Werburgh Village.

3) Have the council sought to liaise with the neighbouring authority to build homes up to the Motorway and provide an enhanced road link from North Dane Way to Hoathway or Sharstead Way roundabout as was originally intended many years ago I believe? This link would have the added bonus of giving better access to Hempstead valley and Gillingham Business Park for Lordswood residents probably helping to ease congestion along the A2. There are many miles of open countryside to the south of the motorway easily accessible to residents.

4) There is already a large country park and ski slope on the doorstep for the residents to enjoy.

5) The area is very close to the M2 providing excellent road links to London and the coast.

6) Ash Tree Lane could be improved to give better access to Gillingham from North Dane Way.

East Rainham has potential with it's close links to the motorway.

The area of North Gillingham bounded by Yokosuka Way, the B2004, Berengrave Lane, and the main rail link is admittedly grade 1 farming land interspersed with some roads and houses. This area offers a new approach to modern city living where there is little need to use a car as transport. A new train station and the re-opening of the disused dockyard railway would provide a link to the universities, St Mary's Island, the existing town centres, London, and the Kent coast. This area could have high density housing perhaps with rooftop gardens coupled with nice open spaces with the emphasis on leisure and cultural activities in keeping with a university area possibly to the north of the B2004 incorporating the present Riverside Park. The views across the river towards the landscape of the Hoo Peninsula would add to the openness feeling. I believe there might be the remains of a redoubt there that could be incorporated into the design which should be pedestrian only in the centre. The B2004 could possibly be replaced with a new through road next to the railway line to link back up with the B2004 before Berengrave Lane. The new railway station could then be built over this road conserving space. This would all fit in with enhanced student facilities and accommodation in nearby North Gillingham.

In conclusion, I believe the vision of being a city should be centred on the increased population living in the area where the 3 main towns are. The emphasis would be on less travelling by car, and easy access to leisure and cultural facilities etc. This area already has many parks and open spaces, sports facilities, golf courses, medical facilities, shopping facilities that can be adapted to modern living, museums, universities, further education, leisure facilities, hotels, the only police station, ambulance station, 2 brand new fire and rescue stations in a good locations manned 24 hrs a day, a league football club, central bus station, several train stations offering a fast service to London for instance, so the list goes on.

The Hoo Peninsula has the potential to expand on it's tourist facilities if the council was so minded. In many ways it is the jewel in the crown until the council shatter it. The RSPB do free tours to listen to the nightingales for example.

I fear the plan put forward by the council will always end up with just 3 towns stitched together with Strood plugged in the other side of the river and a dormitory town of Hoo that is obviously designed for commuters to London with the promise of a possible rail station and rebuilding the track towards London. No easy access to hospital, leisure, sporting, further education, museums, theatres, heritage and park facilities that we all pay for. With only two local crossings and frequent accidents in the tunnel people will be trapped on this side of the river especially when the tunnel is shut for routine maintenance. Even now developers around Hoo have to contribute towards The Great Lines and Medway Park. I cannot image a worse design for a new town than the one submitted. Parcels of land attached around $\frac{3}{4}$ of a village in a haphazard fashion with an arterial road running through the centre. Where is the cohesion in that?

Most of my comments can be backed up by referring to the Draft revised NPPF.

From: [REDACTED]
Sent: 17 May 2018 15:34
To: futuremedway
Subject: Local Plan Consultation

Categories: Blue Category



Appraisal of Medway Council's Draft Local Plan-Sustainability

Transport

I am now retired and grew up in Gillingham close to Chatham Dockyard. We had a dairy farm in our road and many thriving shops and pubs and a buoyant High Street area. I have seen many changes to the town in my life with the orchards being replaced with housing and out of town shopping killing the High Street. Currently the old Gillingham appears very run down and has High levels of pollution. I have also witnessed the village of Walderslade swallowed up with huge housing developments. Likewise other villages. Even all of those years ago developers were banking land, although, to be fair, the original expansion of Gillingham towards Rainham was council housing.

The current solution put forward by Medway Council to solve the housing crisis is to repeat the same mistakes on the Hoo Peninsula exacerbating the destruction of an important area by pandering to developers land banking. They sanitise it by calling it regeneration, never mind that they are enforcing a lifestyle change on many thousands of villagers on the Peninsula. My information is that the Hoo Parish Council has never been consulted on the proposed railway station, widening of the A228, the application for funding for infrastructure, nor, for that matter on the removal of many sports facilities around Hoo. One or two Medway Councillors have unsympathetically mentioned cleansing of wildlife areas and "Hoo will be a town, get used to it".

The council has ambitions of being a city so why create a dormitory town surrounding a village, separated from all facilities on the other side of the river and spend millions of pounds on transport solutions to warrant this decision?

Medway Council state that many people commute by car to the railway stations off of the Peninsula. Where are the studies to support this? If the rail station was at Sharnal Street commuters from Chattenden would have to travel 4 kilometres. My proposal for developing North Gillingham / Rainham with a new station means people from the new development would only travel a maximum of 1 kilometre. Not only that, if you radius out from the new station the 1 kilometre circle would embrace up to Gillingham Business Park. 1 kilometre is quite walk-able and with the emphasis on pedestrianisation this would help to keep a large area free of NO2 improving the air quality. The area is quite flat and could have higher density housing than the Peninsula so taking a huge chunk out of the proposed housing here.

Medway Council plans to widen the A228 running through the heart of the proposed new town thus acknowledging that there would be a huge increase in road traffic. This is already a 4 lane dual carriageway.

Is there an up-to-date traffic impact assessment of the large warehousing at Kingsnorth, the existing industrial estate at Kingsnorth and possible further industrial use of the site of Kingsnorth Power Station, the quarry, proposed expansion of facilities at Thamesport and other commercial uses at Grain? These assessments should be combined with all of the new housing developments on the Peninsula that have already got planning permission based on each one having a minimal impact on the existing road layout. Would all of this spread the unacceptable pollution problem currently experienced on Four Elms Hill?

I have put forward ideas in previous comments to the draft local plan which houses the new population expansion in the main areas of the three towns.

1. The area of Gillingham that I highlighted in a previous comment is next to the main railway link to London and the coast. My idea centres around a new railway station which surely would be a lot cheaper than creating a new two track line from near Gravesend to a station at Hoo. This area has a gentle slope down towards the river making it much easier for walking and probably building (having built my own house in Cornwall on the side of a valley, I know the problems involved even with a rock foundation, unlike the London Clay on the slopes of Hoo Peninsula).
2. This new railway station would go a long way to solving the current high pollution levels in Gillingham providing links to the other Medway Stations located near the existing local shopping areas and leisure facilities.
3. The buildings could be high density with the emphasis on pedestrianisation and cultural and leisure facilities incorporated.
4. Housing could be incorporated to cater for the students who attend the nearby universities.
5. The council have vaguely mentioned reinstating the abandoned dockyard railway line. This line links up to the mainline railway so students would be able to travel straight to the universities on a shuttle service. This shuttle would also open up travel to and from the housing on St Mary's Island and also enable travel from many parts of Medway to the cinema and retail and leisure facilities located next to the old Dockyard basins. The Historic Dockyard visitors would also benefit from this shuttle. All of this could go a long way to cutting down on car usage. To overcome the problem of the shuttle using the mainline at peak hours it looks feasible to run a third track alongside the other tracks which would result in losing some car parking space. Railway management could probably sort that out and also ensure minimum disruption at the Ingram Road crossing.
6. The new station would also be the main link to the old dockyard railway line as Gillingham Station is bypassed by this line.
7. The extreme corners of the new development would only be 1 kilometre from the new railway station which is easily walk-able for most people. An added bonus would be to create access under or over the existing railway to the south thus creating access within a radius of 1 kilometre to embrace many existing houses and retail outlets. All within walk-able distance.
8. There are a few small housing clusters within this area that could probably be incorporated in this development. The remains of a redoubt and any listed buildings could also be incorporated.
9. It might be possible to reroute the B2004 parallel to the railway going under the station. This would then open up the development to sympathetically connect with the river and the existing Riverside Country Park.
10. With the development heavily pedestrianised there would need to be some limited parking around the outskirts and provision for commercial access. Would it be possible to have a road train running through the pedestrian areas? When I visited Calella in Spain this worked very well in narrow pedestrian streets. Again, this could possibly alleviate some of the parking problems in the old part of Gillingham.
11. If the new station was not feasible access could be made to Rainham Station.
12. My previous proposal for part of Capstone valley with the North Dane Way connected to Hoathway will help to ease traffic congestion on the A2 at Gillingham.

I wish to make it clear, although I live in Hoo, the view from my property would not change after all of the proposed development. So, my views are not that of a NIMBY but concern for proposals that fly in the face of government policy.

maryott, kyle

From: [REDACTED]
Sent: 17 April 2018 08:28
To: futuremedway
Subject: Medway plan

Categories: Blue Category

I wish to object to the development of Allhallows we need the fram land to grow food yhe roads are to small yhe village gets cut off in bad winters and this development will more this double the size of the.village. this village cannot sunstane that growth all secondary children have to bus to school and the currant school 100 Hoo is over subscribed and with the building in Hoo already

This village cannot support yhis level of exspansion

Sent from Samsung Mobile on O2

maryott, kyle

From: [REDACTED]
Sent: 17 April 2018 09:17
To: futuremedway
Subject: No building in Allhallows

Categories: Blue Category

Is it not bad enough you have destroyed hoo , you now want to build in Allhallows, is the council so stupid to not see there it's not big enough for more houses not to mention the wild life you keep turving out of there homes , I will not stand by and watch you destroy another village, so please put my comment in , I do not want you to build more fucking houses in Allhallows. Resident of Allhallows

maryott, kyle

From: [REDACTED]
Sent: 17 April 2018 09:52
To: futuremedway
Subject: Allhallows proposal of housing development

Categories: Blue Category

Allhallows does not have the infrastructure for more houses! Already the main road through the village is very busy and it's a country road with no expansion plans! The area is a farming site and this would take away local jobs etc.. and farmers livelihoods! The school is a small village school with not enough resources and there are no suitable doctors spaces for the area having to wait up to 3 weeks for an appointment. The area can not sustain any more builds as with all the new developments in Hoo! Many residents including I strongly oppose.

Kind Regards

From: [REDACTED]
Sent: 19 March 2018 17:18
To: futuremedway
Subject: Medway Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

Hello Medway Future Planners,

With reference to the Rochester Riverside Development I applaud the building of 1,400 homes however there is no reference to traffic engineering, always a weak spot in Medway. The only exit from the site appears to be the single track Gas House lane onto Corporation Street. For many years the carriageway from Star Hill to Strood Hill has been a notorious traffic hold up aggravated when the M2 is blocked. Rarely a week passes by when there are what appear to be random road works somewhere along the route.

On the basis that many households have, on average, two cars—many will want to carry their drivers to work at the same time—could be 2,800 cars. We then have to consider all the service vehicles for the utilities, on line deliveries etc, etc. The City Estate is already an on going disaster area for traffic which should be a warning.

Could this be the result of planning a major housing development in the middle of an already congested area?

Perhaps you did not notice that our MP Kelly Tolhurst, from the floor of the House of Commons, recently challenged the government on the lack of infrastructure planning.

I await your response with interest/trepidation.

Ted Bower
[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 20 March 2018 07:38
To: futuremedway
Subject: Consideration to traffic volume with Medway Regeneration

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

Dear Sir/Madam,

Over the past few issues of Medway Matters (including the Spring issue delivered yesterday) I have read with interest how Medway Council plan to improve Chatham with more pedestrianised areas yet at no point have I read how you are tackling the growing problem of traffic volume going around the Chatham one-way system.

Yes, there were people before cars but you still need to have an equal balance in considering both parties with the design.

Sadly, town centre trade has been affected by shopping centres such as Bluewater and by investing into the town centre this should hopefully attract new businesses to trade there and so I totally understand why we need to invest in the regeneration. However, traffic is still a big issue and whilst I will never understand the logic in making Medway Street a no through road when the bus depot was built, this could now be the Council's opportunity to greatly ease traffic volume by considering the following. Re-open Medway Street taking the road across Waterfront Way (controlled by traffic lights), and then the road bearing to the left down Military Row onto The Brook. The road could be for two way or one way traffic (two way would ease more traffic). This would alleviate a lot of traffic currently queuing around the town to get to Rochester (or Gillingham if coming the other way) and also reduce the amount of car fumes whilst sitting in the traffic. The Council may dispute this idea on the grounds it will not have a pedestrianised area on a part of Military Road where there are retail outlets but it is only going to affect a very small part - Red clothing shop and Co-op bank currently. You may also dispute that the route from the bus depot to the town centre should be pedestrianised but we are all capable of using at least one pedestrian crossing on a shopping trip to Chatham, aren't we? It may also be argued that you don't want to take the road layout of Chatham back to what it was in the late 1970s/ early 80's but back then the road layout wasn't "broken for the Council to fix".

I look forward to hearing from you with regards to the regeneration committee's thoughts on the matter.

Kind regards
Alan Grossmith

Sent from my iPhone

maryott, kyle

From: [REDACTED]
Sent: 17 April 2018 10:36
To: futuremedway
Subject: Medway Plan

Categories: Blue Category

I am writing to state my total opposition to the proposed building on land in Allhallows.

This community thrives as a small community.

The current villagers chose to purchase properties here because they want to live in a small community in a rural area. I commuted to London from Allhallows for 30+ years, an average journey time of two and a half hours each way 5 days per week, to enable me to live in a small rural community and to enjoy my retirement here. I can't afford to move to another small village if this one is expanded and actually don't want to. This is a lovely village and should remain as it is.

While I understand the need for more housing, to build more housing or commercial properties within the village will destroy the village that attracted people to move here in the first place.

If more houses need to be built in Medway I think that new communities should be established i.e. a completely new village, not take the easy route of expanding existing ones.

Expansion of current villages destroys the way of life chosen by existing residents.

Susan Melly

maryott, kyle

From: [REDACTED]
Sent: 17 April 2018 22:01
To: futuremedway
Subject: Allhallows Development Plan

Categories: Blue Category

Good evening,

I've just seen the new plans for the village and am concerned by the size of the new development. It's going to take up a lot of our countryside and spectacular views which make the village a pleasure to live in.

If this plan were to go ahead, and personally I hope it doesn't (I'm all up for development but our village is too small for something of this size), what other provisions are you going to put in place? Are you going to put more shops in? Develop the doctors to ensure they can cope with the new flood of people? They can barely cope as it is!

Will the school be supported and better child care available in the area for pre-schoolers?

When would this build go ahead?

On a different tone, I current rent in the village with an aim to buy, will these houses be affordable or over priced like they were around Shelduck Close?

I look forward to your response.

Kind regards

Emma Prosser

[REDACTED]

From: [REDACTED]
Sent: 18 April 2018 08:58
To: futuremedway
Subject: Future Medway

Categories: Blue Category

It is with some concern that the recently delivered 'Future Medway' proposal indicates a section of land in Allhallows earmarked for potential site allocation on all four of your scenarios. This land which backs onto Queensway has always been Green belt and a haven for wildlife from the adjoining woods. I understand the land is/was owned by the local church and rented to a local farmer who now does not want to farm it. Surely with the diminishing number of green fields in Medway and the need to protect wildlife this land should maintain its Green belt status.

Allhallows only has a single carriageway 'B' road for its access and its venerability was highlighted during the recent bad weather resulting in many days cut off from the rest of Medway. Unless a dual carriageway is proposed to be built along with a new housing development the present road infrastructure would be significantly inadequate as it already suffers from regular road accidents.

Allhallows lost its middle school a few years ago to housing and the primary school left would not be sufficient to handle the influx of more pupils. Additionally the doctors surgery which only opens part time is already bursting at the seams and would need doubling in size to cater for more population.

Finally the village doubles in population during the summer months with the influx of holiday makers to the Haven holiday estate. This causes a strain on the village, the only road in/out, doctors surgery and the part time police coverage is stretched even with the current population. Add on a significant housing development and life would become intolerable.

At a previous parish planning meeting last year residents were told of this proposal, and not given the opportunity to disagree as it was indicated 'it was going to happen'. Feedback from this meeting was that the council had categorically no intention of improving the infrastructure in this area as it was not necessary. It is difficult to appreciate how a village of this size can accommodate an extra 300 home and potentially 1200 additionally residents.

After living in Allhallows for 35 years it does seem that this village has had more than its fair share of pressures after two airport proposals blighted the village, until finally appearing to be resolved, only now to have this forced upon it.

Please re-consider this proposal as it is ill thought out and would lead to misery for many existing residents and a significant loss of green land and wildlife. There must be significant brown field sites around Medway which can be used as alternative sites.

Neil Edgell

From: [REDACTED]
Sent: 19 April 2018 17:11
To: representations, planning
Subject: 9,000 to 12,000 houses being built in Hoo

Dear Council

I live in the village of Hoo and object strongly to the HUGE number of houses you plan to permit in Hoo. None of these houses are being built in those areas occupied by any of the councillors. How do I vote the current councillors out of office?

Also, how does this compare to the number of houses already built in Hoo? I can't find anywhere that states what the percentage house increase would be – 200%? 300%?
Thanks

M J Langridge, FCIS



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maryott, kyle

From: [REDACTED]
Sent: 20 April 2018 16:03
To: futuremedway
Subject: Re: The Hundred Of Hoo Railway/Grain Freight Line

Categories: Blue Category

Hello,

I would like to introduce myself, my name is Ms Shirley Lang. 07 Wall Close, Hoo Rochester, Kent. ME3-9LN. I along with two other's Mr Andrew Strickland and Mr Alan Cooksey. We are moderators of a special campaign group that we set up On Facebook, called The Hundred Of Hoo Railway Campaign Group! We are a public group with currently 380 active members. We set up our group in December 2017. Our aim at the time was to campaign for the reopening of The Hundred Of Hoo Railway/ Grain Freight Line, To be used once again for passenger train services! That closed in 1961 due to the Dr Beeching Cuts! Because of the lack of an alternative form of public transport too and from The Hoo Peninsula!

It is a well know fact, to the majority of Arriva Bus users, that use buses too and from The Peninsula that the service hardly ever runs to timetable, with buses often late and or often seen to be running back from Grain/Allhallows/Hoo ' Not In Service' and not picking up passengers, that wish to go into Strood/Rochester/Chatham to do shopping! The service to The Hoo Peninsula has got considerable worse since Arriva changed the timetables back in July 2015. Although we do understand that increased volume's of traffic on the roads from Chatham have impacted on the running of the 191 service. All the more reason we need a good Train Service from The Hoo Peninsula as a priority. We have since learned From Chris Fribbins Councilor/Clerk of Cliffe woods/ Allhallows Parish Councils, whom supports our group, Unbeknown to us that, he had already been campaigning for the last few years to see The Hundred Of Hoo Railway reopen again! It was he whom directed us to the local plan on Medway Council's Website, otherwise we would not have known about the plans for The Peninsula. This is like a dream come true for our group, and we are hoping that a Train Station in Hoo, will only be the first with many more stations proposed along the Grain Freight Line. Grain Has a big population now and would also benefit from a Train Station, with a shuttle bus service to Allhallows and Lower Stoke, Or new track laid to Allhallows at a new location, It is badly needed...Ms Shirley Lang (The Hundred Of Hoo Railway Campaign Group)

Sent from Windows Mail

maryott, kyle

From: [REDACTED]
Sent: 20 April 2018 18:22
To: futuremedway
Cc: [REDACTED]
Subject: Local Plan consultation: Lodge Hill

Categories: Blue Category

Thank you for inviting comments on the future of Medway. I'm concerned that in the twenty years of the council's existence a vast amount of greenspace has disappeared. I remember seeing a presentation from the first council showing what a diverse place Medway was with industry, commerce and open spaces for all the population to enjoy.

Now on the Peninsula I have seen that the council is proposing to make Hoo into a large town. It appears that this is well underway with all the recent planning applications accept and considerable building work started in and around Hoo. This saddens me and I'm aware it isn't all the fault of the council with central government demanding more and more homes in the area. Perhaps instead of bowing to their wishes the council should fight them through the courts and encourage us residents to protest against the demands.

My other reason for contacting you is my concern that Lodge Hill is again in the line of sight of the developers. I care about the local environment and I am proud that Nightingales have one last stronghold in Medway . I'm also concerned that development shouldn't happen on land with an SSSI designation, perhaps the developers should be asked to respect this. It appears they are seeking profits before considering community facilities. Lodge Hill should , in my opinion be excluded from the development options in Medway's local Plan. The inclusion of Lodge Hill would set a dangerous precedent for other SSSI's

Many thanks for taking the time to read this.

Yours faithfully

Ian Sparling

[REDACTED]

[REDACTED]

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 10 May 2018 11:33
To: futuremedway
Subject: Consultation on local plan proposals

Categories: Blue Category

Extension of Hoo to become a town.

As a resident of Hoo for 20 years I'm unhappy to see this proposal in the plan. In particular the lack of creativity in the development of the local infra structure to enable such development. The pressure on local residents to move freely has recently been demonstrated with the closure of Bells Lane for some weeks when a sewer collapsed.

To take pressure of the roads I would welcome the development of rail lines onto the peninsula or even the creation of a tram network. If the money could be found both could be developed. This would have the benefit of reducing the vehicle traffic and lowering pollution.

Regards

Ian Sparling

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 21 April 2018 17:20
To: futuremedway
Subject: Draft local plan

Categories: Blue Category

Dear council,

Having reviewed your new draft plan for medway I am shocked to see that this still includes plans to build on and around lodge hill. This area of special interest is essential habitat for a range of endangered and protected species.

Building on lodge hill will be detrimental to the biodiversity of medway and have significant impact on entire species, such as the nightingale.

The council must consider the environmental future of medway and all its inhabitants. Please keep lodge hill as the natural environment it is.

Kind regards

Julia Hurren

Wysłano z telefonu Samsung

From: [REDACTED]
Sent: 22 April 2018 16:30
To: futuremedway
Subject: HOO PENINSULA

Categories: Blue Category

Your plans for the Hoo Peninsula are nonsense.

You can't turn Hoo into a town, that's madness. 30,000 additional ones will make it bigger than Rochester but there's a big problem with that, there's only one road.

This road is blocked whenever there's an accident anywhere in the towns. This road is blocked whenever there's snow. In March the road was closed due to snow. And that's not an isolated event.

In 2009, in 1990, in 1987, in 1984, and in 1980, the peninsula was completely cut off from Medway due to snow. Luckily the army were on hand to help out, but the army has gone.

At the moment there are slightly in excess of 20,000 people living on the peninsula. Imagine the chaos when there are 120,000 people with no way on or off the peninsula.

And even when the road is open, traffic conditions will be horrendous. Getting off the peninsula already involves a long wait at the Four Elms roundabout, it will be impossible when traffic has increased by 600%.

The big problem is that it is a peninsula. It's surrounded on 3 sides by rivers, there is only one land access and one road. That road has already been widened and even now it barely copes (and at times, it doesn't cope).

The 191 bus which serves the peninsula is already notorious for lateness and unreliability, and it's already the longest journey that any passenger in Medway has to endure. With increased traffic on the roads, with increased roads in Hoo and increased bus stops and a huge increase in the number of passengers, a journey by bus will become an expedition and an ordeal. It will not be a viable means of getting to work.

And I haven't even mentioned that the peninsula is a rural area and supposedly protected from excessive development.

I oppose these plans with every fibre of my being.

K Neville
[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 22 April 2018 18:38
To: futuremedway
Subject: Future Medway "Consultation" response to document
Categories: Blue Category

Firstly I have to say the maps are not very clear even when i went on line and enlarged them (is that deliberate I wonder?)

In my opinion before any houses are built the infrastructure needs to be reinforced and built (where required) and sufficient social housing must be provided. However with the government cut backs my fear is that the houses will be built without put the infrastructure in place despite promises which is likely to cause social problems later on - so I would like to know how the improved infrastructure will be funded?

The houses are going to be built by private developers and sold at high prices and therefore not affordable to the average working person (by social i mean affordable rent not part buy/part rent)

I appreciate new homes need to be built but across the country it appears housings are being thrown up to meet government targets with little thought - such is the case of Deangate Ridge

Doubt whether my thoughts will be considered but i felt I had to comment

Ann Martin

maryott, kyle

From: [REDACTED]
Sent: 23 April 2018 14:04
To: futuremedway
Subject: Article spring edition medway matters

Categories: Blue Category

Hallo

I note from the above that the new local plan envisages that some of the growth to locate to a new town on Hoo peninsular .

The idea is to invest in upgrading services transport links and new facilities for local people (what ever that may mean).

However where will the new GPs be found from they are in short numbers as it is, additionally the only hospital in the area Medway Maritime is overflowing at the moment,in Gods name how will it able to cope with the anticipated increase in population.

Notwithstanding the above it will put a massive strain on ,gas,water and electric supplies South East England has numerous rainfall shortages as it is.

All in all the council will have to give more details as to how these points are addressed.

Regards
G Crawford

[REDACTED]
Sent from my Windows 10 phone

maryott, kyle

From: [REDACTED]
Sent: 20 March 2018 15:57
To: futuremedway
Subject: hoo peninsular development

Categories: Blue Category

I know this probably wont make any difference but i just wanted to say that i am sick to my stomach to read what is instore for this area. I moved to High Halstow 13 years ago and already i've seen some horrible changes. There wont be such a thing as a village anymore when you've finished, its just towns you want to create, you dont even care about all the rare birds nesting near hear as long as houses can be built.

From: [REDACTED]
Sent: 23 April 2018 15:04
To: futuremedway
Subject: Local Plan

Categories: Blue Category

Dear Sir / Madam

As I understand the situation:

Medway Council wishes to build an unproportioned number of houses upon the Hoo Peninsula.

Although most people would argue that new houses are required, the way the council are behaving is such that certain councillors are protecting their own environments whilst at the same time failing to listen to the concerns of local residents on the Peninsula.

The Council have not behaved in a democratic fashion, and to this end, should not be permitted to impose their plans without intervention from Government and consultation with residents. Other areas of Medway must accept a share of these extra houses and not be exempt simply because the leader of the council does not want housing in his own ward. The new master plan MUST consider the views of the people affected by such drastic changes and actually live within the confines of what is planned.

One thing is certain, virtually every member of the population in Medway do NOT accept that 27000 or 28000 extra dwellings can nor should be accommodated and that the council should do more to insist that this level of development is entirely unsustainable.

I believe that Medway Council agree that the number of people living in the Medway Towns is NOT growing as fast as predicted and that a figure of between 10 and 12 thousand new homes on the Peninsula is obscene.

Hence, the council should honour the views of residents and think again before destroying the beauty of the Hoo Peninsula.

The council are not honest and use underhand tactics to impose their will. This must be investigated and this practise must end.

Where for example are the New Homes to be built?

The council will NOT be specific on this. How can we protect our environment when we do not know what is actually planned.?

No clue is given as to the development of infrastructure. protection from environmental damage, nor to the dangers to our health.

We have crowded and insufficient roads as it is without additional congestion and pollution being forced upon us.

Seeing a Doctor is more or less impossible now and even Bells Lane Surgery have admitted that even with enlarged facilities, the recruitment of staff is very difficult.

We have no idea what new shops and transport links would be forthcoming and again, this is evidence of the council behaving in a less than honest fashion.

At present, small plots of land are being given over to housing in an unregulated orgy of building driven simply by the greed of the developers.

This must stop such as to allow proper and full discussion of where new homes CAN and CANNOT be built.

Show us where these developments are going to be and stop treating us with such contempt.

Further serious consideration MUST be given to the developments proposed with SSSI areas.

Even the Prime Minister spoke recently about the need to protect trees and ancient woodland. It is bad enough that habitat has already been destroyed in places with no consultation at all.

To destroy habitats is an act of vandalism and should not happen, even more so on sites designated as Special Scientific Interest.

Therefore Lodge Hill should be treated as a special case and the consultation process must be even lengthier and more in depth.

There are many more issues which need to be addressed concerning Hospitals/Medical Care/ Schools etc. and answers are required as to why other sites within Medway are not being considered within the framework of the local plan.

Medway council MUST listen to us. Must consult with us, and prove to us that they can be flexible on so many of the issues stated above.

I trust you will note my comments.

Best Regards:

David Merrall

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

.
.

This email was scanned by Bitdefender



Our Ref: ESFA/Local Plan/Medway 2018

24th April 2018

Dear Sir/Madam,

Re: Medway Local Plan Development Strategy

Consultation under Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations 2012

Submission of the Education and Skills Funding Agency

1. The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. The ESFA launched on 1st April 2017, bringing together the existing responsibilities of the Education Funding Agency (EFA) and the Skills Funding Agency (SFA), to create a single funding agency accountable for funding education and training for children, young people and adults. The ESFA are accountable for £61 billion of funding a year for the education and training sector, including support for all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.
3. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and the ESFA is the delivery body for many of these, rather than local education authorities. As such, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We do this through a variety of means, including by supporting the adoption of sound local plan policies, site allocations and guidance (all based on robust evidence) that facilitate the delivery of education infrastructure where and when it is needed and maximise developer contributions for schools. In this capacity, we would like to offer the following comments in response to the proposals outlined in the above consultation document.
4. The comments provided here follow on from the responses submitted by the ESFA to consultations on previous versions of the local plan and the recent consultation on the developer contributions guide. Cross references have been included to specific consultation questions in the draft local plan where relevant.

General Comments on the Local Plan Approach to New Schools

5. The ESFA notes that significant growth in housing stock is expected in the borough, with the Government's new standard method for calculating Housing Need indicating a need for 37,143 homes over the plan period, or 1665 homes per year. This could mean a housing target substantially higher than the target of

29,463 homes consulted on in the previous Local Plan Development Options consultation.

6. This level of housing growth will place significant pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.
7. The ESFA welcomes reference within the plan to support the development of appropriate social and community infrastructure, including education infrastructure, in the vision (p.18), strategic objectives (p.23) and the section on the Hoo Peninsula Rural Town (p.29, p.31). The emphasis on the timely and effective delivery of infrastructure and the requirement for developers to contribute to the funding of key infrastructure in **Policy H1: Housing Delivery** and **Policy I1: Infrastructure Planning and Delivery** are particularly welcomed. **Regarding Question I1**, the policy is considered an appropriate approach to planning for infrastructure requirements.
8. **Policy I3: Education** is also supported as it represents an appropriate approach for securing education facilities to support new housing (**Question I3**). The clarification that large new residential developments will need to provide education facilities on site, informed by the School Organisation Plan and assessment of existing capacity by the education planning team; and the reiteration of the need for developments to contribute to the funding of education are especially welcomed. It may also be useful to reference the Integrated Development Plan in this policy, as this can provide a clear indication to developers and other stakeholders about the anticipated scale of education infrastructure that will be required at different sites; moreover, this information can be updated regularly in accordance with the latest projections.
9. In light of the requirement for all Local Plans to be consistent with national policy, the explicit references at paragraph 10.9 to *National Planning Policy Framework* (NPPF, para 72) advice on planning for schools is welcomed. This picks up a comment made in the ESFA's response to the previous Development Options consultation.
10. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 156)¹, the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places.
11. Ensuring that there is an adequate supply of sites for schools is essential and will enable Medway to swiftly and flexibly respond to the existing and future need for school places to meet the needs of the borough over the plan period.

Site Allocations

12. At this early stage of the emerging Local Plan site allocations have not yet been drafted. However, the consultation document does set out a broad development strategy, focusing investment on urban waterfront and centre opportunity areas as well as the development of a small rural town around Hoo St Werburgh (that would include new schools).

¹ NPPF paragraph 180 specifies that this collaborative working should include infrastructure providers.

13. The next version of the Local Plan should seek to identify specific sites (existing or new) which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand in the annual review of the School Organisation Plan and the Infrastructure Delivery Plan. The site allocations or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required (informed by Building Bulletin 103²), any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy CC7 in Milton Keynes's Plan:MK Preferred Option draft from March 2017³.
14. Delivering new schools could form a part of a wider strategy for improving education attainment. This is recognised as a 'core priority' in the local plan (paragraph 10.10) and would be in keeping with the Department for Education's categorisation of Medway as a Category 5 'Achieving Excellence Area', a measure of current educational performance and capacity to improve which was published by the Department for Education in March 2016.⁴.
15. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site-specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The EFSA therefore recommend the Council consider highlighting in the next version of the Local Plan that:
- specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that
 - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.
16. The ESFA currently has a series of live free school projects in Medway:
- Inspire Academy Chatham – this special school is open on its permanent site, but is due to expand.
 - The Beeches, Chatham – this alternative provision school is proposed to be located on a site very close to the school above.
 - The Bridge Academy, Rochester – this special school has a site which is on part of an existing school site (The Delce Academy). A pre-app meeting is taken place with the Council in the near future.
 - The Maritime Academy - this all-through school is still seeking a site and the process has been very difficult given the size of the school (3FE primary and 6 FE secondary, 1500+ pupils) and the lack of available sites. Any ongoing assistance the council can provide in securing a deliverable site would be welcomed.
 - Medway Academy, Rainham - this is a large secondary school that has a proposed site; an initial pre-app discussion recently took place with the Council.

² <https://www.gov.uk/government/publications/mainstream-schools-area-guidelines>

³ <https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk>

⁴ <https://www.gov.uk/government/publications/defining-achieving-excellence-areas-methodology>

17. **The ESFA requests that the next version of the plan includes site allocations safeguarding and referencing all of the above schools, where sites are identified.**
18. The local planning authority should note that there are two routes available for establishing a new school. Firstly, where a local authority thinks a new school needs to be established, section 6A of EIA 2006 places the local authority under a duty to seek proposals from new school proposers (academy trusts) to establish an academy (free school) and to specify a date by which proposals must be submitted to the local authority. In this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and pre-/post-opening funding and managing the build process. Secondly, an academy trust can apply directly to the Department for Education during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or may provide a site for basic need. For further details please see:
<https://www.gov.uk/government/publications/establishing-a-new-school-free-school-presumption>

Forward Funding

19. In light of the proposals for a new town on the Hoo Peninsula including new education infrastructure, emerging ESFA proposals for forward funding schools as part of significant residential developments may be relevant, for example if viability becomes an issue. The ESFA aims to be able to clarify forward funding options for schools in 2018. We would be happy to meet to discuss this opportunity further once the proposal for the new town has been refined and if/when relevant. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.

Evidence Base

20. The approach to planning for schools should be 'justified' based on proportionate evidence. A Medway Infrastructure Position Statement has been produced that indicates planned provision of new primary schools at Hoo St Werburgh and as part of the Rochester Riverside development. The consultation document states that the council is working on a full **Infrastructure Delivery Plan** (IDP), to be published alongside the next version of the Local Plan. This will be a key evidence base document identifying the strategic infrastructure interventions needed to support growth over the plan period, including new and expanded schools.
21. It will be useful if the IDP can, with respect to education infrastructure, set out clearly how the forecast housing growth at allocated sites (and the likely scale and distribution of growth of non-allocated sites) has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places (primary, secondary, sixth form, SEND) and new schools over the plan period. Account should also be taken of any need arising from developments close to the borough boundary in Kent. This evidence base is not yet clearly presented. Setting out this evidence 'story' will be important to demonstrate that the approach to the planning and delivery of education infrastructure is '**positively prepared**' based on a strategy which seeks to meet objectively assessed infrastructure requirements and **justified** based on proportionate evidence.

22. [Reigate and Banstead's Infrastructure Development Plan](#) is a good example of an IDP that systematically sets out the education evidence base, with a clear story from evidence of need to site allocations.

Developer Contributions and CIL

23. The ESFA provided comments on developer contributions in our response to the Development Options consultation in May 2017. In addition, we responded to the consultation on the revised Medway Guide to Developer Contributions in February 2018. These comments are not reiterated here, however draft policy I2 is supported as it is considered to represent an appropriate approach (**Question I2**).

Conclusion

24. Finally, I hope the above comments are helpful in shaping Medway's Local Plan, with specific regard to the provision of land for new schools. Please advise the ESFA of any proposed changes to the emerging Local Plan policies, supporting text, site allocations and/or evidence base arising from these comments.
25. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Medway Council to aid in the preparation of a sound Local Plan.

Yours faithfully,



Douglas McNab MRTPI
Forward Planning Manager



Web: www.gov.uk/esfa

From: [REDACTED]
Sent: 24 April 2018 15:09
To: futuremedway
Subject: Local Plan

Categories: Blue Category

To whom it may concern,

1. We accept that some extra houses are needed in Medway, but think that every community in Medway must take its share. They can not use the Hoo Peninsula as a dumping ground for major development. The infrastructure is already crippled under the weight of the new developments already. Doctors appointments are like gold dust; school places have virtually run out; the sewage system is at breaking point.
2. We do NOT accept that Medway can accommodate 27,000 more houses between 2017-2035. The Council MUST show that they are doing everything possible to get government to agree that this is unsustainable for Medway.
3. We think that 10-12,000 extra houses on the Peninsula is WAY too many. That would destroy everything that makes the Peninsula special.
4. The Council admits the number of people in Medway is not increasing as fast as it was - so I ask the Council to recalculate and reduce the total number of houses it needs.
5. It is impossible to tell from the consultation what number of houses are allocated where on the Peninsula, so I would like the Council to work with us on a 'masterplan' to include in the Local Plan, before any more housing applications get passed, so we can agree what houses, transport infrastructure (including public transport), doctors, schools, and shops are needed, where and when. The Council must pledge an end to piecemeal development here until that masterplan is in place.
6. We want the masterplan to consider the people who already live here, so that new housing fits in with our lives and our communities and doesn't ruin people's lives. We need to know that our children will be able to continue living on the Peninsula. Homes need to be affordable to locals, not just Londoners wishing to commute...
7. We think the Council hasn't explored several key options that are essential. For example, the Council should consider an attractive development at Kingsnorth, Capstone and Rainham. And the Council should consider redevelopment of Chatham town centre with housing options. These must be on the table, not just dismissed.

8. Medway Council must share with the people the plans they have for the roads and railways on the Peninsula, and for tackling air pollution. If the Council already has bids in for funding, there must be plans already, and we should see them.

9. The Local Plan must have more detail about the future of hospitals in Medway. It must include a timeline and possible locations.

10. We want the Council not to sacrifice protected places, such as Lodge Hill SSSI. Protected places should be Medway's trump card to say to government, "Hold on, we've got nationally and internationally protected places here, there's a genuine limit under national rules to what housing can go here".

11. We are willing to work with Medway Council in a constructive dialogue. We want to know that Medway Council is genuinely willing to work with us.

Kind regards

Gillian Bovis (Mrs)

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 24 April 2018 18:56
To: futuremedway
Subject: HOO PENINSULA DEVELOPMENT

Categories: Blue Category

Hi

I have just seen in The Peninsula Times that you plan to build 40,000 additional homes here. Your own estimate is for 3 persons per house, so that is an additional 120,000 people.

It will be the biggest of the 4 Medway Towns. There will be twice as many people living on the Peninsula as in Chatham, 5 times as many than Strood, 5 times as many in Rochester, and 50% more than in Gillingham.

It will be bigger than **Chatham, Rochester and Strood combined**, and only slightly smaller than Gillingham and Chatham combined.

And you have decided to build this massive urban area in the last rural area of Medway on a peninsula with only one road for access.

The Medway Towns already have major traffic problems with notorious blackspots, Chatham Railway Station, Rochester Bridge, Medway Tunnel and the two roundabouts to the Peninsula. The river prevents a major obstacle with only 3 crossings and, significantly, the peninsula has none.

All 4 Medway towns have several points of entry and exit. problems on one road can be circumvented by using another but the Peninsula has one, Four Elms Hill. It's frequently at a standstill in peak travel times, and all day on Saturday. It's frequently closed when we have snow. It comes to standstill whenever there is an accident by the tunnel or in Strood.

How do you expect 140,000 people to use Four Elms Hill as their only means of access to the peninsula? At the moment the population is only 21000 and already travelling onto / off the peninsula is a major headache with long delays. Four Elms Hill will not cope. It's not coping now.

There are no alternatives to using the road. There are no railway stations. There are no other roads. Four Elms Hill is it.

Imagine the traffic that 40,000 new homes will bring. Plus the traffic for the industrial developments also planned.

The bus service can't cope now. The 191 is the most complained about bus service in Medway. Due to the blackspots and the one access road, it is impossible to run this service to the timetable. It is also the longest bus journey undertaken by passengers in Medway. With 40,000 new homes and the new industrial estates, the number of passengers will increase to an impossible level, and the bus route will have to incorporate new roads and new bus stops, all adding to the length of the journey. It will be logistically very difficult, if not impossible.

And there are no leisure facilities on the peninsula other than the swimming pool in Hoo. The golf course has closed. There are no cinemas or restaurants. And what of new schools, doctors and shops? Yet more building and more green areas lost.

What are 140,000 people trapped on the peninsula meant to do?

This plan is insane. Add your 40,000 new homes to areas that are already urbanised and have several access and exit routes. This is a rural area, for a very good reason, building here is madness.

Hoo is a rural area. Keep it rural.

K CAPPLEMAN

maryott, kyle

From: [REDACTED]
Sent: 25 April 2018 16:00
To: futuremedway
Categories: Blue Category

Planning on hoo peninsula requires services and road infrastructure. Colin Allison

From: [REDACTED]
Sent: 25 April 2018 16:14
To: futuremedway
Subject: The Medway Plan

Categories: Blue Category

I would like to stress the importance of retaining village life out on the peninsular. As I have lived here now for over thirty years I do realise that we have to have some progress ie housing. However this should not be to the detriment of the people already living here.

1) We already have problems at times with only one road on and off the peninsular and this will get worse with more housing.
We had been promised several years ago a slip road from the wainscott bypass up Four Elms Hill this has not materialised but would help the peninsular immensely.

2) The two doctors surgeries are at breaking point as recently heard they are full and not taking any more patients. We cannot get appts now, so therefore more housing will only increase the population.

3) School places will need to increase.

4) Transport is an issue and will become a bigger problem. With an increase in traffic how long at busy times will it take to get on and off peninsular.

5) Amenities ie supermarkets leisure pursuits etc. Already plans have been submitted for Deangate to shut, the houses now being built at the top of Chattenden have in their selling information about Deangate as a selling point?

6) Wildlife needs to be considered not least at Chattenden the Nightingales are important.

7) We should perhaps consider the Police role for the peninsular as we seem to pay for a service that is no longer available to us.

We seem to have to cope without as there is no visible police presence as there used to be. We occasionally see them drive through the village, but I think this is a tick box exercise. We have antisocial behaviour every summer nothing is done until people keep reporting instead of a 'deterrent presence' by the police.

Rosemary Allison
Get [Outlook for Android](#)

From: [REDACTED]
Sent: 26 April 2018 12:50
To: futuremedway
Subject: FUTURE MEDWAY - March 2018

Categories: Blue Category

We have read a copy of the above document. It was received at a Wigmore Resident's AGM last night, otherwise we would not have been aware of it. Would it be possible to put details of such important consultations in with Council Tax bills, otherwise I suspect 90+% of residents are unaware of this plan.

We have the following comments on the development strategy:

1. Our preferred option is not listed. There should be NO further development south of the river until such time as transport infrastructure is drastically improved. There has been significant development in this area over the last few years and this, coupled with more car ownership, daily commuters, shoppers, delivery vehicles, visitor numbers means that the existing transport routes are creaking at the seams.
2. Of the options listed in the paper our preference in order is Option 2, then 1, then 4. It is quite obvious from the maps that there is insufficient room to squeeze more than a few hundred extra houses south of the river, so the Hoo peninsular is the only option for significant expansion, if that has to be the choice.
3. We oppose option 3 completely. Medway is already becoming far too crowded and busy. Option 3 would destroy what little environmental attractions remain compared to 30 years ago.
4. We oppose any further development in the Capstone Valley, one of the few remaining green lungs in the densely populated area south of the River Medway.

Please can you keep us advised of the outcome of the consultation and further plans

Thank you

26 April 2018

Alan and Pauline Buckett

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 26 April 2018 17:32
To: futuremedway
Subject: Medway Matters Spring 18 article 'Have Your Say on How Medway Grows'
Categories: Blue Category

Hello

I read the above article recently and would like to let you know that personally I would prefer a rural town to be built on the Hoo Peninsula rather than further re-development around the edges of Strood, Rainham and Capstone.

Kind Regards

Pauline Holmes

maryott, kyle

From: [REDACTED]
Sent: 27 April 2018 12:40
To: futuremedway
Subject: Local plan

Categories: Blue Category

I do not accept that Medway Council think that they can turn Hoo into a town as they obviously think it's the easiest option.

Medway is a large enough area to spread the building of this vast amount of houses equally. We do not and will not have the infrastructure in Hoo in time to cope with the amount of houses that medway council wants to build. It's about time medway council organised some sort of monitoring system to see how bad it is getting on and off the peninsula at the busiest times. One road in and one road out and how long did we have to wait for that road to be built.

Schools are at their maximum capacity. But if you read the reports that these property developers submit, you wouldn't think so. Doctors surgeries cannot offer enough appointments for the people that already live on the Peninsula.

10-12,000 extra houses on the Peninsula is WAY too many. That would destroy everything that makes the Peninsula special. We already have had almost 1000 been built in Hoo over the last few years with another 800 proposed. Enough is enough until we can sustain the community we already have.

The masterplan must consider the people who already live here, so that new housing fits in with our lives and our communities and doesn't ruin our lives.

If all these houses were spread over the whole of medway that already has enough infrastructure to cope at the moment until it can be improved then it makes more sense. I accept that some extra houses are needed in Medway, but we think that every community in Medway must take their fair share

The Local Plan must have more detail about the future of hospitals in Medway. It must include a timeline and possible locations.

Medway Council must also not sacrifice protected places, such as Lodge Hill SSSI or any other protected space.

Fiona Beer
Sent from my iPhone

maryott, kyle

From: [REDACTED]
Sent: 27 April 2018 12:47
To: futuremedway
Subject: Development at or near to Lodge Hill SSSI

Categories: Blue Category

Dear Medway Council

I am very concerned that the draft plans include consideration of allocation of land in or adjacent to Lodge Hill SSSI for housing.

Lodge hill is a nationally important wildlife site. It contains ancient woodland, supports many species of animals, birds, insects and plants and has one of the largest populations of nightingales in the UK.

Such SSSI sites are essential for conservation of nature. The important characteristics of the site have developed over many years and cannot be compensated by simple allocation of land elsewhere.

Protection of SSSIs is essential for the quality of life of the present and future populations in the UK.

Yours sincerely
Barbara M. Lund

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 20 March 2018 16:52
To: futuremedway
Categories: Blue Category

Before you even think of building anything the infrastructure, schools, shops etc have to be in place. I believe they will not be and nor is it ever likely that we will have these things. WE DO NOT WANT TO BE A TOWN.

From: [REDACTED]
Sent: 28 April 2018 14:55
To: futuremedway
Subject: LOCAL PLAN CONSULTATION - BN25/H11 & SELF BUILD

Categories: Blue Category

Sirs/Madam,

I wish to contribute to the discussions on the above which is being finalized.

I am interested in carrying out a self build in Medway, preferably on the Hoo Peninsula where I currently reside. My property (and other neighbouring properties) is on a plot of approximately three-quarters of an acre and supports a 5 bed house. In the view of a planning staff member the plot could easily support another property of similar size on access and other grounds. However, because it is part of a settlement of seven other properties planning would be refused under policies BN25 AND H11 - Residential Development in Rural Settlements/Development in the Countryside. As the settlement is on a former brownfield site I cannot understand why an exception cannot be made for consideration of a planning proposal for this {and similar sites}. Development would not extend the boundaries of the settlement and would have little impact on neighbouring homes. It seems to me that BN25 and H11 could be amended to provide exceptions in cases such as these with every planning application considered on its merits. This could release a small additional number of building plots for development.

Another further point related to self build concerns the Council's commitment to the self-build community. I am on the Council's register of interest in self-build plots. However, there have been very few plots notified to those on the register since its inception. I would like to see the planning process require developers to set aside serviced building plots for self-builders at market prices. Self-builders, as a whole, provide well considered designs using quality materials often with eco features built in which enhance the local area and should be encouraged by local government.

Regards,

Mr J Krefta

St Mary Hoo Parish Council

Response to Medway Local Plan Consultation 2018.

The option of turning Hoo into a rural town and expanding existing villages on the Peninsula would mean some 10 – 12000 additional homes. Whilst we accept that development is necessary we feel that the distribution should be more proportionate and shared throughout the whole region, not mainly on the Peninsula.

We believe that the estimate of housing needs is inflated and encourage a review of numbers in line with normal local growth and demand.

The new plan should give consideration to the lifestyle of existing rural communities and not cause more congestion, pollution and delays. More thought should be given to the possibility of a smaller new village or town at Kingsnorth and the inclusion of sites in Chatham, Rainham and Capstone to share the load.

The Peninsula currently has only one access road which is seriously affected at peak traffic times and by delays at Wainscott, Frindsbury Medway City estate and the tunnel. Four Elms Hill is often slow moving and sometimes closed during accident or severe weather conditions. This road is already overburdened. Bus services are not coping or running to schedule at present causing anxiety for residents with hospital, doctor, dental, legal appointments etc. Further development on the Peninsula should only be considered if alternative road and rail provisions are planned alongside.

There are currently few leisure facilities or services to cope with the proposed growth around Hoo and it would take years and major funding to catch up with increased demand. We would need schools, healthcare facilities, shops, public houses and restaurants, employment opportunities and improved transport. We believe that the provision of such services should be planned parallel to housing expansion and local communities fully consulted with at each stage of development. More information on funding and locations for service and leisure facilities should be made available.

There are concerns regarding the environmental impact, especially for the protection of SSSI's, heritage sites, areas of historical interest and open spaces including existing parkland and public rights of way. This should be fully included in future discussions.

In summary we ask the Council to demonstrate the sustainability of the plan and to lay out the provisions and funding for improved infrastructure, public transport, leisure facilities and protection of rural lifestyle for existing residents. Peninsula people should clearly benefit from employment opportunities and improved transport and not see existing facilities overwhelmed by an incoming population. We do not object to progress and change but request that it is fair, proportionate and well managed.

St. Mary Hoo Parish Council

maryott, kyle

From: [REDACTED]
Sent: 30 April 2018 10:51
To: futuremedway
Subject: Medway Council Local Plan - No Way to Scenario Four

Categories: Blue Category

Dear Planning Policy Team,

After receiving the news that development of the Lodge Hill SSSI would not go ahead only in September last year, we thought we could all breathe a sigh of relief, safe in the knowledge Medway Council could be counted among those who would champion sustainable and positive growth to the area, by building new homes whilst cherishing and maintaining important areas of recreation and biodiversity.

Not so, it seems, judging by the latest edition of the Strood and Hoo Peninsula Times, in a U-Turn that has left heads spinning across the county. Instead it would appear that development of important natural sites are still potentially up for the bulldozer.

I have to say this is severely disappointing, especially in light of the recent win by local activists against the Open Cast mine development in Druridge Bay. It should be pretty clear to all councils that our environment is no longer up for grabs.

Please abandon these plans once and for all so I don't end up having to sit in a deck chair in the soaking rain to protect the welfare of our badgers and nightingales.

This could be an extraordinary win for the Council if they took some time to develop an interest in the environment and take the progressive step of championing it, instead of destroying it for all future generations.

No Way is Scenario Four happening. Please drop this immediately, if only so I don't keep having to have a mini-heart attack every time it comes up (again?!?!).

Many Thanks,

Sophie Dewsnap
[REDACTED]

From: [REDACTED]
Sent: 01 May 2018 08:34
To: futuremedway
Cc: [REDACTED]
Subject: Port of London Authority Response: Medway Development Strategy Consultation (Regulation 18)

Categories: Blue Category

Dear Sir / Madam

Please see below for comments from the Port of London Authority (PLA) on Medway Council's Development Strategy consultation. For information, the PLA is the Statutory Harbour Authority for the Tidal Thames, which in the Medway context covers the area from Cliffe pools to Yantlett Creek within the Thames Estuary. Peel Ports are the harbour authority for the River Medway itself and parts of the Thames Estuary, including at Grain and Sheerness, and should also be consulted on this strategy. The PLA's statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movement's within its jurisdiction and its consent is required for the carrying out of all works and dredging within its area. The PLA's functions also include for promotion of the use of the River Thames as an important strategic transport corridor.

Question T8: Do you agree with the proposed policy for riverside infrastructure in Medway?

The PLA broadly supports policy T5 on Riverside Infrastructure, which states that Ports, wharfage and associated infrastructure including piers, jetties, slipways, steps and stairs will be safeguarded in order to support existing business sectors and to attract businesses requiring such facilities.

Question MWE1: Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway?

Whilst the PLA is supportive of the safeguarding of wharfage within the borough (particularly the facility at Cliffe, which is within the PLA's jurisdiction), the PLA have concerns with the wording contained in policy MWE4 on Minerals Wharves and Railheads and MWE5 on Minerals Infrastructure. Policy MWE4 states that identified minerals importation and distribution facilities that currently benefit from permanent planning permission will be safeguarded from development that would prejudice or prevent their operation, and then gives a number of criteria where release would be acceptable. Bullet point 3 of both policy MWE4 and MWE5 state that one of these reasons is:

"Material considerations indicates that the need for the proposed development override the presumption for safeguarding"

The PLA considers that this is not justified and is not in general conformity with the National Planning Policy Framework (NPPF), specifically paragraph 143 which states that wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials should be safeguarded. The PLA considers that wharves need a robust protective policy to prevent their loss to higher value uses, and without such a policy then there is a real risk that wharves will be lost to non wharf uses, and once these facilities are gone it is highly unlikely they will be provided again. The PLA considers that the redevelopment of wharves can only take place in appropriate circumstances – for example if the wharf is not viable or capable of being made viable.

An example of where a strong safeguarding policy has been applied in relation to wharves is in the London Plan (2016) which includes a statement (paragraph 7.77, policy 7.26 on increasing the use of the Blue Ribbon Network for Freight Transport) that the redevelopment of Safeguarded Wharves should only be accepted if the wharf is no

longer viable or capable of being made viable for waterborne freight handling use. The only exception to this would be for a strategic proposal of essential benefit for the region, which cannot be planned for and delivered on any other site in the region.

The PLA considers that the NPPF itself makes clear under paragraph 143 that existing, planned and potential wharfage and associated storage, handling and processing facilities need to be safeguarded as well as existing, planned and potential sites for concrete batching or other such facilities, and does not go on to say to safeguard these sites unless material considerations indicate that the need for the development overrides the presumption for safeguarding. It is therefore considered that bullet point 3 of both policies MWE4 and MWE5 is too broad and should be removed and replaced with the following:

“it constitutes a strategic development of essential benefit to the Medway area, which cannot be planned for and delivered on any other site in the region”

Question MWE2: Do the proposed policies MWE6 – MWE10 represent the most sustainable approach to managing Medway’s waste?

The PLA broadly supports policies MWE6 – MWE10 regarding the management of Medway’s waste, but have the following proposed amendments.

- It is noted that policy MWE7 on New Waste Management facilities will give special consideration to existing industrial estates that utilise existing rail facilities or the River Medway as a means of transportation. The PLA considers that this should be expanded to also make reference to the River Thames as well as the River Medway.
- The PLA supports the reference in policy MWE9 (Waste Disposal to land) towards the encouragement of the use of transport via rail and water.

In summary, the PLA’s principal concerns are that policies MWE4 and MWE5 are considered to be too flexible in regards to the loss of safeguarded sites, particularly at the safeguarded Cliffe Terminal and must be strengthened to allow for the robust protection of these sites. The PLA considers that it must only be in exceptional circumstances, such as a strategic proposal that cannot be planned for and delivered on any other site in the region that material considerations over-ride the presumption for safeguarded wharves and associated facilities. Wharves require a robust protective policy, and without such a policy then there is a potential risk that wharves will be lost to non wharf uses, and once these facilities are gone it is highly unlikely they will be provided again.

If you wish to discuss any issues raised in this response please contact us on the details below

Regards

Michael

Michael Atkins
Senior Planning Officer
Port of London Authority



- Find out more: www.pla.co.uk/Thames-Vision
- Follow us on twitter: @LondonPortAuth



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website: www.pla.co.uk

maryott, kyle

From: [REDACTED]
Sent: 01 May 2018 10:43
To: futuremedway
Subject: Future of Hoo.

Categories: Blue Category

Dear Planning policy Team,

I'm opposed to all four scenarios of development. After spending my whole life of 60 years living on the peninsula the quality of life is declining in many ways.

The infrastructure can not cope.
The journey to and from work takes far too long.
The schools, doctors are full.
The sewage treatment for the area leaks awfull smells at fourelms hill.
The peninsula is supposed to be rural and protected.
The southeast is far too over populated.

What has happened to all of the money that the council must have received from the earth being tipped at Deangate? No money has appears to have been spent on the peninsula from the houses which have already been built.

Kind regards Mark Lockyer.

Sent from Samsung tablet.

From: [REDACTED]
Sent: 01 May 2018 12:48
To: futuremedway
Subject: RESPONSE to Local Plan Consultation

Categories: Blue Category

Please accept my response to the Local Plan:

1. I accept that extra houses are necessary, but let's not take the easy way out and put them all in one place, **blighting the green spaces** and the joy of living in a rural community.
2. **10-12,000 houses** on the Peninsula is **NOT** reasonable or **proportionate** to demand.
3. The rate of growth is not sustainable and I ask the council to recalculate and reduce the number of houses it needs.
4. The Masterplan does not consider its current residents on the Peninsula. New housing and **growth should be gradual** and ensure local communities can adapt to change.
5. The local plan doesn't prescribe **HOW MANY NEW HOUSES** are allocated to the Peninsula. I would like to local council to work with our communities on the Master plan to include in the Local Plan before any more housing applications get passed. We would like to have in put into what type of housing is being provided, transport infrastructure, doctors, schools and shops are needed.
6. I would like further consideration to be given to **further development at Kingsnorth, Capstone and Rainham** as well as housing options being part of the re-development in Chatham town centre, where there are excellent transport links.
7. I would like to know more about plans for the **roads and railway links on the Peninsula**. Currently there is one road on and off the peninsula which will fast become not only congested, but a risk to the safety of residents living on the peninsula. A railway station should be prioritised and a link direct to the A2 from the peninsula avoiding the four elms roundabout junction.
8. I would like to know more about **AIR POLLUTION** plans. With poor public transport options currently on the peninsula, there is little option but to own a car and drive. This is not sustainable.
9. The local plan must have more detail about the future of hospitals and medical facilities and exactly when they will be introduced to cope with the increased demand.
10. Our **protected places including SSSI should REMAIN protected**. Medway council should be using this as a negotiating point to slow or reduce the development in our rural areas.

Many thanks for your consideration.

Mrs A Mitchell
[REDACTED]

From: [REDACTED]
Sent: 01 May 2018 14:13
To: futuremedway
Subject: Local Plan consultation

Categories: Blue Category

My response to the Local Plan.

It is inevitable that Medway requires more housing. 27,000 houses are planned but with a disproportionate amount planned for the Hoo Peninsula (between 10,000 - 12,000). This is simply unsustainable. The increased building is destroying the community spirit in these villages. And they are villages. They are not towns. The infrastructure and local facilities do not support urban living. There is inadequate infrastructure to cope. There is only one viable route out of the peninsula and it only takes one road traffic accident for this to be rendered impassable, often for hours on end.

Kingsnorth has rapidly expanded in recent years and, with the addition of the new gravel pits, our roads are struggling to cope with the influx of lorries, let alone the increase in traffic that 12,000 new homes will bring.

What plans does Medway Council have for the roads and railways on the Peninsula, and for tackling air pollution?

The local sewerage system already struggles to cope. Four Elms Hill is often dug up to try to resolve the issue, but the water board have already commented that the sewerage system is unable to cope even without the addition of 12,000 new homes.

There is a lack of doctors, schools, and shops to support this proposed increase in population.

Public transport is unreliable and costly and simply not adequate to meet the existing needs of local people, let alone the addition of thousands more.

These issues need to be resolved before any more development takes place.

Hoo, in particular, has been left with a rise in petty crime and vandalism and there are inadequate Police resources to cope. Joy riding, graffiti and burglaries have become almost common place, as has anti-social behaviour. Parking is difficult and causes friction between neighbours.

The Peninsula offers green space and farming land. Increasingly, this is disappearing under new houses, particularly in Hoo where so many new houses have been built in recent years. Promises have been made to improve infrastructure and leisure activities for locals, but often the monies are spent elsewhere in Medway.

We need Medway Council to identify with the Peninsula, to support us, to see our area as the beautiful, historic, rural area it is and to stop using it as a "dumping ground" for housing. Vital green space has been built on, or is earmarked for building. This is a rural area that is fast becoming urban, with a distinct loss of community values. Wildlife is being affected and our beautiful countryside is disappearing under concrete.

Something needs to be done to prevent it before there are no areas of green left in Medway. Instead of housing, we would welcome a new sports facility or a country park that can benefit the whole of Medway.

There are other options available. How about Rainham and Capstone? How about redeveloping Chatham and Gillingham town centres, improving the shopping experience and converting some of those unused buildings for housing?

We want to protect Lodge Hill SSSI. Protected places should be Medway's trump card to say to government, "Hold on, we've got nationally and internationally protected places here, there's a genuine limit under national rules to what housing can go here". Please use that trump card, try to reduce the amount of housing Medway has to provide, and, please, do not build as many houses as possible on our beautiful Peninsula.

Nicki Riches

Section 3 - Development Strategy

P24-37

Southern Water is the statutory water and wastewater undertaker for Medway and seeks to work in collaboration with local authorities, developers and other stakeholders to understand the location and timing of development, to ensure the right infrastructure is delivered in the right place at the right time. Strategic infrastructure such as extensions to wastewater treatment works can be funded, planned and delivered through the water industry's 5 yearly price review process and once adopted, the Medway Local Plan will inform Southern Water's investment planning.

However, the ability of local infrastructure, such as a local sewer connection point, to accommodate new development will be assessed on a site by site basis. Where additional capacity is shown to be required, development should be delivered in parallel with the new infrastructure required to service it.

We therefore look to Medway Council to ensure, through planning policies and conditions, that development is coordinated with the provision of infrastructure. This will ensure that levels of service are maintained for both new and existing customers, and that the risk of flooding is not increased to unacceptable levels.

Once Medway Council has made further refinements to its development strategy and determined the location and scale of individual housing sites, Southern Water will carry out capacity assessments on the local sewerage and water infrastructure as outlined above.

Policy NE 1: Sites of international importance for nature conservation P101

Southern Water understands Medway Council's desire to protect the internationally designated wetland habitats within the district. However, we consider that the current wording of Policy NE1 could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.

Although there are no current plans, Southern Water may need to provide new or improved infrastructure at some point during the plan period. Due to the need to connect into existing networks, there may be limited options available for the location of new water or wastewater infrastructure (e.g. a new pumping station). The National Planning Practice Guidance (ref: 34-005-20140306) recognises this scenario and states that *'it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs'*. In addition, the NPPG (ref: 34-005-20140306) states that the provision of water and wastewater infrastructure *'often consists of engineering works rather than new buildings'*.

Paragraph 118 of the NPPF stipulates that where an adverse effect on the special interest features of a site is likely, an exception can be made when the benefits of the development clearly outweigh the impacts that it is likely to have. Furthermore, the NPPG (ref: 8-011-20140612) links to the 2005 Government Circular: Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System, which provides guidance on the application of the law relating to planning and nature conservation. Paragraph 25 of this document states that planning permission can be granted to proposals within internationally designated sites where there are "imperative reasons of overriding public interest". The 2007 Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC (section 1.8.2) cites "human health" as belonging to the most important imperative reasons of overriding public interest, and the provision of water and wastewater services are "essential" for securing public health, as stated on page 8 of the National Policy Statement for Waste Water.

We therefore propose the following amendment to Policy NE1 (new text underlined):

[...] No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site, alone or in combination with other plans or projects, as it would not be in accordance with the Habitat Regulations 2010 (as amended) and the aims and objectives of this emerging Local Plan, unless it is for the provision of essential water or wastewater infrastructure.

**Policy NE7: Flood and Water Management
P110-111**

Question NE7:

Do you agree with the proposed policy for flood and water management?

Southern Water is the statutory water supplier throughout most of Medway district. As such we support policies that protect groundwater supplies and water quality.

Policy BE1: Promoting High Quality Design

Page 116

Question BE1:

Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?

Southern Water notes the inclusion of a policy criterion requiring new development to respect the amenity of neighbouring uses (bullet point #9). National policy also requires the potential impact of existing development on the amenity of the occupiers of future development to be considered when making planning decisions. Paragraph 109 of the NPPF states that both new and existing development should be prevented from *"contributing to or being put at unacceptable risk from, or being adversely affected by, levels of soil, air, water or noise pollution"*. Furthermore, paragraph 120 of the NPPF makes it clear that *"planning policies and decisions should ensure that new development is appropriate to its location. The effects of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account."* Annex 2 of the NPPF establishes that pollution also includes odour.

Where housing or other sensitive land uses are proposed in close proximity to existing wastewater infrastructure (such as wastewater treatment works) Southern Water would seek to ensure, through appropriate design and/or layout, that the amenity of future occupiers of the development would not be unduly affected.

What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

Accordingly, we propose the following amendment to Policy BE1 (new text underlined, deleted text ~~struck through~~):

- *Respects the amenity of neighbouring uses through consideration of light levels, overshadowing, overlooking, loss of privacy, visual intrusion, appropriately designed car parking and ensuring ~~minimal impact through that~~ development does not result in, or is exposed to, excessive noise, vibration, fumes or light pollution, and other relevant considerations.*

Policy BE2: Sustainable Design

Southern Water supports the inclusion of the higher national water efficiency standard of either 110 litres/person/day or 90 litres/person/day for residential developments.

Southern Water's supply area is designated as an 'area of serious water stress' as advised by the Environment Agency (EA Final Classification 2013), and as a result Southern Water has focussed on a twin track approach of reducing leakage across its network whilst also encouraging greater water efficiency in homes and businesses.

Furthermore, as part of OFWAT's New Connections Services Charging Arrangements implemented from 1 April 2018, Southern Water has opted to waive its water infrastructure charge (formerly £379.62 per property) for new homes constructed to achieve water use of 110 litres or less per person per day in order to encourage the delivery of more water efficient homes. For further information see: <https://www.southernwater.co.uk/media/default/PDFs/new-connection-charging-arrangements-18-19.pdf>)

Policy I5: Utilities

Southern Water supports the spirit of Policy I5 regarding early engagement. We would additionally wish to encourage developers to engage with Southern Water at an early stage in order to ensure phasing of the site is coordinated with the delivery of the required infrastructure.

In addition, we would request the following amendment to Policy I5 (new text underlined):

Significant new development proposals will be assessed to determine the impact on the existing network (water, wastewater, electricity and gas).

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

2nd May 2018

My reference: PCA/20111-11

Dear Sir,

Medway Council Local Plan 2012-2035: Regulation 18 consultation

Peter Court Associates have been instructed to submit appropriate representations to this draft local plan by Messrs David and Neil Taylor, who own and operate Port Medway Marina at Cuxton. Representations were previously submitted to your Issues and Options Consultation Document in February 2016 and to the Development Options Consultation Report that was published in January 2017. In making those representations, I briefly explained the nature of my clients' business and their intentions, together with a site plan, since those provided the context for the submission of the representations. As that situation still holds good today, I do not intend to re-iterate what I previously stated. However, I should also add that pre-application advice has subsequently been sought and provided. Nevertheless, I would be pleased to provide any further background information, should it be required.

This latest consultation seeks responses to a range of questions. I have therefore provided responses to those that are most relevant to my clients' objectives.

Question DS1: Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth? What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

Objection is made to the fact that the Council has failed to state that it will meet the requisite forecast development needs over the plan period. Instead it states that it will seek to meet the "needs" -which is quite different, since it does not define them. Moreover, it has devoted a considerable amount of space and effort in justifying a quantum of housing that is substantially below what the government has identified as being required as far back as September 2017. Moreover, and in response to enquiries by local authorities, the government confirmed in January 2018 that it expected these latest figures to be delivered. Given the fact that the Council's adopted local plan is time-expired and that it has twice failed to produce an up-to-date plan, then it is surely incumbent on the Council to no longer waste time and money arguing about how much housing is required and instead do as the government has stated.

With regards to the Spatial Development Strategy itself, the Council's proposal to make best use of underused and previously developed land is most welcome, since my clients' site is of that very nature.

Policy DS2 goes on to explain that the council will consider a degree of development in suburban locations around Rainham and Capstone and in five named villages. As there is no reference to Cuxton or, indeed, to Port Medway Marina itself, it is requested that these are included in a revised version of the draft local plan. My clients' site is in a sustainable location and is particularly close to Cuxton railway station. Its development would therefore accord with government policy in the existing and new draft National Planning Policy Framework.

The omission of any reference to Cuxton as a location for development is most surprising, especially as it was identified for incremental expansion in three of the four strategies in your Development Options consultation in January 2017. Moreover, Cuxton was identified as an expanded village in the Rural Focus strategy. As the overall housing requirement is now higher than previously considered by the council, it is even more surprising that expansion of Cuxton now appears to have been discounted.

Objection is therefore made to this omission and its re-instatement is therefore requested.

Question H1: Does the proposed policy for housing delivery represent a sound approach? Would you suggest an alternative approach?

Your approach to this issue is sound. Nevertheless, and as pointed out in response to Question DS1 above, the Council has yet to decide how much housing you should provide and where it will go. You therefore need to accept the government's proposed housing figures and identify sites to meet that provision. Unless you do this quickly, you will face development by appeal rather than development through the plan-led system.

Given that the Council set out various growth strategies in its previous consultation document, it was hoped that it would by now have been able to allocate land to meet its housing and other requirements. Unfortunately, that is clearly not the case. **It is therefore hoped and indeed requested that the Council will quickly accept that it needs to meet the government's housing targets and allocate sufficient land -including my clients' land at Port Medway Marina-to meet them.**

Question H2: Does the proposed policy for housing mix represent a sound approach ? Would you suggest an alternative approach?

In order to meet the housing needs identified for Medway, the Council should identify a range of different types of site across the authority. My clients' site at Port Medway Marina has its own characteristics and is situated towards the south western periphery of the authority -away from the main areas currently indicated for future development. Its allocation would therefore demonstrate that the Council was genuinely looking to provide a range of homes in a variety of locations. It would, moreover, make use of and support the existing services and facilities at Cuxton.

Question 3: Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision? What do you consider would represent an effective alternative approach?

The acknowledgment by the Council that further work is required to test the viability of the Local Plan and its policies is welcomed. Moreover, by the time that that work has been undertaken and the Regulation 19 version of the Plan published, the government's revision of the National Planning Policy Framework will be in place. **Your policy will therefore need to be in accordance with that document and with any further research.**

Question E6: Do you agree with the proposed policy approach to the rural economy. What alternative approaches would you propose?

The Council's support for rural businesses is welcomed. However, it first needs to show that it understands such businesses and the financial and other environments in which they operate. **It should not, therefore, impose policies that unduly restrict their ability to operate, expand and to generate jobs and wealth.**

Question E7: Do you agree with the proposed policy approach towards tourism ? Would you suggest an alternative policy approach?

Policy E3: Tourism states that the Council will promote sustainable tourism development that can make a positive contribution to Medway's economy and cultural life -but where it meets the principles of sustainable development. It then adds that it will support the development of rural and marine- based tourism, where they can demonstrate that negative impacts on the environment can be avoided.

Whilst this in itself sounds reasonable, it is wholly dependent upon how the Council decides what constitutes "sustainable development" and the extent to which it is prepared to consider the balance between negative and positive impacts. As currently worded, the policy allows the Council to reject any proposal that is deemed to have a negative environmental impact.

As we all know, there is no such thing as a perfect development, since there are negative environmental impacts with any proposal. Moreover, given the imposition and extension of environmental policy constraints over the past 70 years, it has become substantially more difficult for development to take place. Whilst the importance of planning and environmental controls is acknowledged, a balanced approach has to be taken by local authorities in determining planning applications.

The fact of the matter is that Port Medway Marina is a long-established operation. It provides employment for 35 people. Moreover, it adds an extra dimension to the wider economy through the multiplier effect relating to businesses that supply it and in terms of bringing business into the area through it being a visitor attraction.

When responding to the Council's Development Options consultation document (January 2017) my clients expressed strong concern over the fact that Port Medway Marina had not even been identified in the plan of such facilities. Since then, there have been pre-application meetings where the Company's development proposals have been discussed and helpful advice received from the Council. Nevertheless, no specific reference is made in this Regulation 18 consultation document to the existence of my clients' most important facility.

In these circumstances it is requested that Port Medway Marina and, indeed, other marinas in the authority are identified on the Proposals Map. Moreover, policy E3 be amended to make it clear that the Council will support development proposals where the impact is acceptable and will result in environmental and other improvements.

Question E8: Do you agree with the proposed policy approach towards tourism? Would you suggest an alternative policy approach?

Whilst this question is the same as E7, the matter upon which the Council is seeking responses is that of visitor accommodation. The statement in paragraph 5.41 that evidence supports the expansion of the supply of visitor accommodation across a range of markets, including berths and marinas, is most welcome. Nevertheless, and as stated in response to question E7, the policy needs to be amended so as to provide reasonable certainty as to the Council's willingness to actually support appropriate development proposals. At present, policy E4 supports proposals where they avoid negative impacts on the environment. Unfortunately, virtually all proposals can be considered to have one or more negative impacts-such as increased traffic generation, noise and pollution. **The policy therefore needs to be amended to make it clear that development proposals of this nature will be supported where, on balance, the positive aspects outweigh the negative ones.**

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?

The Council's aim of creating and extending riverside paths along the Medway is very much supported - indeed, my clients are able to assist in this respect. Furthermore, this has already been one of the matters discussed in pre-application meetings. The provision of this and other facilities is something that the Council needs to consider when assessing planning applications. **As previously stated in respect of responses to questions E7 and E8 above, the Council needs to take a balanced view of the benefits of development along with those that may be considered to be negative. This is therefore one instance where such an approach needs to be adopted.**

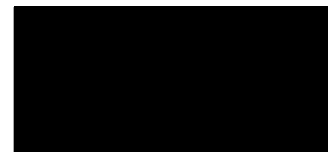
Question T12: Do you agree with the proposed policy for marinas and moorings in Medway ? What alternative approach would you prefer?

The Council's statements in the supporting text that there is significant potential for growth (para.11.40) and that proposals for upgraded or new high-quality facilities and amenities will be supported (para.11.41) are most welcome. However, the Council then undermines this stance by making its support conditional on there being no adverse environmental impacts.

It is a fact that any development proposal can be considered to have some negative environmental impacts. This point has already been made in response to questions E7 and E8, but needs to again be made here. The Council therefore needs to think seriously about whether it is genuinely possible for any proposal to have no negative impact. **It should therefore re-word this policy in order to make it clear that it will take a balanced approach to the consideration of positive and negative effects when assessing**

t no development will take place -

my clients concur. Indeed, these
n meetings. Indeed, the overall
nd has encouraged my clients to
site. In these circumstances it is
d marina-related development.



Peter Court
Director



From: [REDACTED]
Sent: 02 May 2018 21:25
To: futuremedway
Subject: Consulting on a Development Strategy

Categories: Blue Category

Dear Planning Policy Team

It is Important that the Medway Unitary Authority Area is Kept as much Greenery as Possible for the Benefit of Present and Future Generations and also as Well Wildlife.

Brownfield Sites Need to be Used First including Not Least Empty Buildings for Residential Purposes and in the Inner Medway Towns it is Vital as Well that Greenery is Preserved as Well as it Enhances the Quality of Life.

Some Buildings have been Unused For at Least Over 9 and a Half Years and the Council could see about Buildings like such being put to Usage as Residential Places and Equally with some Shut Shops as Well.

Hoo Saint Werburgh a Village should Stay a Village and The Countryside around it Looked After as Land Serves a Purpose other than just to be Built On.

Council should also Say to Central Government that Housing Target of 37,000 Homes is too High and Councils should be able to Set Targets which are More Sensitive to Local Communities

Lodge Hill Site with it's Nightingales Needs to be Preserved For both the Benefit of Wildlife and People . It should Not just be Asphalted Over . It is an Important Birdlife Habitat

Your's Sincerely

Mr Robert Lee Shipley

maryott, kyle

From: [REDACTED]
Sent: 23 March 2018 17:22
To: futuremedway
Subject: Woodland: A suggestion about the environment

Categories: Blue Category

Hello,

I was recently introduced to a company that creates dense and established forests in short timeframes, bringing improvements to air quality, visual aesthetic and biodiversity. I would love to know if this could be a possibility within Medway. In particular, I would highlight that the company's methodology is offered open-source for free ([here](#)) and that such a forest can be fitted into the space of six parked cars, meaning there are a plethora of derelict sites that could benefit. There is one such site near where I live on the corner of Luton Road and Castle Road that has been an eyesore for some time.

I've linked their website below, along with a Ted talk that might provide an alternative introduction.

Thanks for your time!
Cameron

<https://www.afforestt.com/>



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Create dense, native forests using one of the pioneering methods of forest creation in the world, combined with the experience and expertise of Afforestt.

https://www.ted.com/talks/shubhendu_sharma_how_to_grow_a_forest_in_your_backyard



How to grow a forest in your backyard

www.ted.com

Forests don't have to be far-flung nature reserves, isolated from human life. Instead, we can grow them right where we are -- even in cities. Eco-entrepreneur and TED ...

maryott, kyle

From: [REDACTED]
Sent: 03 May 2018 11:46
To: futuremedway
Subject: Medway Plan

Categories: Blue Category

Dear Sir/Madam

I attended our local Parish Council AGM last night where I was made aware of Middle and Lower Stoke being included in the Local Plan.

My comments on this as are follows:

Proposal for 18 houses in Middle Stoke.

The area being high lighted for these houses has a large gas pipe running under it. From a previous planning application I was under the impression there can be no building within so many feet of this, therefore, 18 houses seems too many.

I have photographs where our roads have completely flooded. Extra houses would enhance the risk of this happening with the possibility of more damaging effects.

Our current system for the removal of sewage does not work. Every time it rains we have tankers reversing down our road day and night. This keeps our children awake and blocks our roads. Extra houses will increase the pressure on an already antiquated system. Several houses in the village have raw sewage in their gardens on a regular basis.

Parking is also an issue already, more houses will add to this.

Proposal for 376 houses in Lower Stoke.

This will double the size of our village. Our road infrastructure is already inadequate. If there is an accident from Four Elms onwards we effectively become cut off.

Our children currently walk up the side of the road without pavements when going to school. This is often precarious and it is only luck that a child has not been injured. This issue has been raised many times over the years and there has never been a solution to this. The extra children this amount if housing would bring would make the road even more dangerous. We also have a very small school and I question whether it would be adequate to cope with a large number of extra children.

It is also a shame that the villages haven't received a copy of the proposal so for the most part are unaware of these plans. It would be nice if there could be another opportunity for them to see the presentation that was given last night.

Yours faithfully

Jo Barrett

Sent from my iPhone

maryott, kyle

From: [REDACTED]
Sent: 03 May 2018 12:54
To: futuremedway
Subject: Say no proposal in development of stoke

Categories: Blue Category

I don't personally feel we should have a development in this area it's not the town it's a village. I have grow up here all my life and being 28 I feel I now have a daughter who is 3 and want her to grow up in a great community. Reason for also living in stoke is that it quite don't get much trouble before you know all the problems that happen in town with be spend wider field. The housing will not be affordable will have people moving from London then before you know it it be knife culture I don't want bring my child up in that world fair to say nor would you. And where are all these people suppose to go doctors or will you then rip are village hall down increase place. Where is the line???? Kent is meant to be garden of England and all i can see is more n more houses. You've recently gone ahead with ripping golf course and also opposite the top of 4 elms round about. We will become a town and no longer a village and that is very sad to say the least you do this then what more houses n more it's bloody ridiculous. And it will be the failing of the council if this is approved as for likes of me in social housing moved to be close to family you will push them out to feel like moving they moved to a village for good reason same as I want for my daughter. And also for going make houses you have to provide a super market of some sort and then are local shops will fail kill there business and where all these children suppose to school you going build bigger school and child care the village will be no longer. And yes not saying more houses should be built but they better things to spend money on like trying to find accomodation n housing for homeless and and people with children living in b&bs. The priorities are all wrong and I pray you don't do the above and see that it's wrong proposal and that we do need grass and tress to grow and survive in this world and you killing out of it out of greed. You all talk about recycle it's good for the plant so yeah your build all these houses plant a few trees and world is healthy place. Sometimes things are best left as it won't be you who have deal with years of development and I'm extremely disappointed that you are prepared make a village no longer. It will jobs for a contractor but every day people will receive no benefit apart from it will it bring to community other than up roar and stress and crime and traffic pollution and lose of the green earthy areas which make it a village it is as rural area. You will destroy it and the kent garden of England be no longer before you now it and you would have been part of it. Heart breaking really. And I hope that every single one of the not in favour of the proposal are not taken lightly. Your propz go ahead as you love to waste money on things that don't need to happen.

Kind Regards

Emma swann

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From: [REDACTED]
Sent: 07 May 2018 17:57
To: futuremedway
Subject: LOfcal PLAn Development STrategy Consultation

Categories: Blue Category

Please accept this as my response to the consultation concerning the future development strategy for Medway. I strongly object to the proposals for the following reasons

1. Housing Need:

So far as I can see the Council has simply accepted their OAN as the housing requirement without applying policy. The policy-on figure should be very much lower due to existing substantial constraints, not least the extent of protected sites and marshes (SSSI, Ramsar and high landscape value areas, SLA etc.) . It is not clear how this has been factored in.

There does not appear to have been any evidence of the duty to co-operate being effective. For example, neighbouring Gravesham has very high levels of derelict PDL in urban areas. Investment in their infrastructure could release those sites for development.

2. There is a lack of balance between environmental impact and need.

The proposals for the Hoo peninsular, and particularly the proposals for Lodge Hill are fundamentally unacceptable. The number of houses proposed for the Hoo Peninsular is excessive and will create a serious degradation of the area for the foreseeable future, as the whole area becomes a massive building site. It really is time that both the Council and Homes England recognised the importance of this site in particular its importance for nightingales at a time when the national population has been devastated over recent years. This site should not be built on. Why don't Homes England hand it over to the RSPB.

The Hoo Peninsular is treated as wide open to development. There is no recognition of the very fragile rural character of this area and its very special landscape character. I suggest that the entire peninsular should be designated a National Park or AONB. This was in fact put forward some time ago by Thames Gateway consultants. It would offer the opportunity to give this area the environmental lift that it so desperately needs.

I would be grateful if you would include me in any future consultation on this matter.

3. Vague or non existent infrastructure proposals

The consultation document makes no clear provision for the range and location of necessary infrastructure particularly on the Hoo Peninsular. It is, frankly, ludicrous to propose this scale of development without being able to show how such development would be properly supported by decent infrastructure.

I would be most grateful if you would consider my comments as part of the consultation.

Thank you
Jonathan Clay

From: Lt. Col. F. R. & Mrs. H. M. Beringer

To: The Planning Policy Team
Medway Council
Planning Service
Gun Wharf
Dock Road 7
Chatham
Kent ME4 4TR



th. May, 2018

Dear Sir,

Re: Medway Council Draft Local Plan

It is once more with considerable dismay and disbelief that we learn that yet again a new application has been made for development at Lodge Hill, despite the clear and, to us, legally binding rejection of the previous applications. This 'new' application suffers from all the problems of its predecessor.

You will have copies of our objections to the previous applications and these still apply. To the increased pressure on local facilities, on which we have already enlarged, we would continue to emphasise the ever-present and increasing problem of Medway Hospital. As Medway Council must be aware from recent inspection reports, there is already unacceptable pressure on the hospital, particularly in A & E. There is an urgent need for a second hospital to be built in this area. We feel that Medway Council would be much better employed in helping to resolve the already deteriorating situation at Medway Hospital along with the immense pressure placed on the Peninsula General Medical Practices, due to the existing large number of patients they must provide care for, rather than in adding to their major difficulties by approving this new development.

We would emphasise our concern in several other areas.

- We have a nationally important SSSI in our midst. We should seek to preserve, not destroy, it. Development should not happen on land within an SSSI or next to it, where it will cause an adverse impact on the protected wild life.*
- The development fails the tests set out by the NPPF to protect wild life, a point confirmed by an independent Government planning inspector.*
- Therefore Lodge Hill SSSI, or, indeed, a buffer zone around its boundary, should **not** be included in the development options in Medway Council's Local Plan, as this would have **the 'adverse impact', which the Council is required to avoid**, on the nightingales, ancient woodlands and other wild life.*

- *We have made the point before that Lodge Hill is not truly a 'brownfield' site.*
- *Including Lodge Hill in its Development Plan would set a dangerous precedent, weakening the protection to SSSI's across the entire country.*
- ***Medway Council should be proud of and willing to support and promote the fact that the Hoo Peninsula is the most important place in the whole country for such a famous bird as the nightingale.***

We suggest Medway Council should follow the government's flagship planning policy, the NPPF, and refuse planning permission for development at Lodge Hill.

Fred
Yours faithfully,
Beringer
Hazel Beringer

Copies to:



maryott, kyle

From: [REDACTED]
Sent: 08 May 2018 07:01
To: futuremedway
Subject: Sponsorship

Categories: Blue Category

Myself and various neighbours are somewhat concerned at the news that Medway council are to be the new sponsors for Gillingham FC.

In view of various plans set out for land in our area to be considered for a new site for Gillingham FC I am wondering if this sponsorship is ethical. I do hope that any planning applications from Mr Scully are not given priority !

I would welcome your comments.

Mrs V Webb
Sent from my iPhone

maryott, kyle

From: [REDACTED]
Sent: 27 June 2018 16:14
To: futuremedway
Cc: [REDACTED]
Subject: RE: NHS Medway Local Plan Consultation Feedback
Categories: Blue Category

Dear Planning Policy Team

NHS Medway would like to add some additional comments to their reasons sent to you on 8 May and seen in the trail below.

They would also like to make the following points:

- Page 128 states “The council collects funding from developers of housing schemes over 10 homes that is passed to the Clinical Commissioning Group to invest in local GP services.” This is not technically correct in that it stays with the Council until an agreement is reached on how this money can be utilised and this agreement is subject to NHS England approval. Can this be amended to reflect this.
- Page 129 Policy HC1 does not mention reducing air pollution despite is being one of the main avoidable causes of death and illness. Can this please be amended to reflect this.
- The CCG is of the view that the Medical School and how it will support the training of new GPs and other doctors should be mentioned.
- The CCG is of the view that there should be a specific reference to the recognition that the Hoo Peninsula will require a HLC to support the increased population.

Thank you for your consideration of these additional matters.

Best Wishes

Jill Norton
NHS Medway Clinical Commissioning Group

[REDACTED]

From: [REDACTED]
Sent: 08 May 2018 10:16
To: 'futuremedway@medway.gov.uk'
Cc: [REDACTED]
Subject: NHS Medway Local Plan Consultation Feedback

Dear Planning Policy Team

NHS Medway CCG has reviewed the Local Plan Consultation Document and would like to make the following comments:

We note that 4 development options are considered to deliver:

- 29,463 homes by 2035 (Council's Objectively assessed need – OAN). Assuming 2.4 people per dwelling, this would result in a population increase of 70,711 population. Assuming a WTE GP looks after a patient list of 1,800 this would require an additional 39 GPs
- 37,143 homes by 2035 (Government calculations of local Housing need). Using the above parameters, this would result in a population increase of 89,143 population and would need an additional 49 GPs.

This is a significant increase of population and the Document itself recognises the current challenges on infrastructure and access to healthcare services, making the point that this was raised as a real concern by local residents during the Issues and Options Consultation. For the CCG as commissioners of healthcare services this scale of population growth will place huge challenges in terms of our ability to delivery new or expanded facilities, support our providers with developing and growing their workforce to deliver services to this new population and to ensure financial affordability and sustainability. We acknowledge the points made about how planning can work jointly with the CCG to address the infrastructure challenges e.g. through securing S106 contributions and land for new / expanded facilities. This needs to be genuine planning gain so that the CCG can ensure the plans are affordable and deliver value for money.

The CCG is currently developing its Strategic Estate Plans to address local needs and will factor the growth assumptions into its planning. Challenges are posed by the adoption timescale of this Local Plan and by the volume of windfall sites. We have calculated that 3,332 windfall dwellings would require 4 WTE GPs some early knowledge of the potential locations is essential for our planning purposes.

Under all Scenarios the Hoo Peninsula is set to see significant growth and this will require healthcare infrastructure to be developed in a suitable and affordable manner. The current 2 GP Practices already operate over a number of sites and ability to sustain this demand will be a key factor in their service delivery.

We note the points made about Medway Hospital and would wish as commissioners of this service to be included in discussions.

Finally we support the aims set out to reduce health inequalities and support healthier lifestyles through:

- promoting healthier lifestyles through green infrastructure and opportunities for everyday activity
- Improve access to healthcare and services
- Support access to health and affordable food and food growing

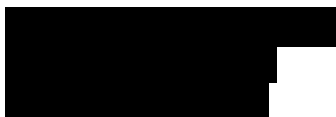
We know that within Kent and nationally there is much work on developing Healthier towns through design and we would wish the lessons learnt to be adopted in the design and planning of these new communities.

Please do contact us if you wish to discuss any of our comments.

Best Wishes

Jill

Jill Norton
NHS Medway Clinical Commissioning Group



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maryott, kyle

From: [REDACTED]
Sent: 08 May 2018 10:44
To: futuremedway
Cc: [REDACTED]
Subject: Local Plan, inclusion of Chattenden Woods and Lodge Hill

Categories: Blue Category

I would like to protest in the strongest possible terms to Scenario 4 of your Development Strategy. As you are well aware, Lodge Hill and the surrounding woodland is a very important habitat for Nightingales, one of Britains most threatened birds. It is an established fact that, in this modern world, with its associated noise pollution and hectic lifestyles, our countryside and wildlife is essential for well being and more and more people are getting out into it, watching wildlife and enjoying a little peace and tranquillity. To deprive future generations of the opportunity to hear the song of the Nightingale and enjoy the countryside, would be a travesty and a poor indictment of our generations lack of regard for our world.

The area is a SSSI, any development in this area would have a devastating effect on the wildlife, a substantial undeveloped area around Lodge Hill is vital to protect the Nightingales for the effects of urbanisation.

Furthermore it would surely have the very "adverse impact" which you are required to avoid in your planning.

Your other proposals would already have a detrimental effect on the green spaces which are currently an integral part of the Hoo Peninsula, so preserving that relatively small area which is so important is essential. Well-considered development of small village areas, though unpopular with current residents, would not have such a devastating impact, and, in the long term, would increase and enhance the viability of those communities.

Lynda Hammond



Sent from [Mail](#) for Windows 10

From: [REDACTED]
Sent: 08 May 2018 15:22
To: futuremedway
Subject: Local Plan Development Strategy Consultation 2018

Categories: Blue Category

I think it undeniable that the Medway Towns are fast becoming a tributary of the London suburbs, hence your 'Future Medway – Development Strategy' makes for interesting reading. That "The council has identified four alternative approaches to how Medway could grow to meet the aims of the Local Plan. The council has no preferred option at this stage" raises, in my opinion, the question of why only one of these approaches has to be the 'preferred option,' rather than a balanced combination of all.

To quote John Muir (the influential Scottish-American naturalist and conservationist), there should be "not blind opposition to progress, but opposition to blind progress." Before the area becomes the oft-seen development of soulless homogenisation that inspires or placates no one, what is required is a bold vision and collaborative working that addresses the concerns and wishes of all stakeholders – from the government and local council, to environmentalists and those who want to buy a property or will consider moving to the area, perhaps planting roots for generations to come – by focussing on the triple bottom line of 'people, planet, profits.'

Developments should create resilient and sustainable communities, taking into consideration the areas' natural and historical significance (its 'genus loci'), alongside the need for mixed use developments to support the widest possible range of people (e.g. from starter and shared ownership apartments through to detached houses; offices; shops; doctors surgeries; schools; community centres; parkland and woodland) in order to build walkable neighborhoods – thereby cutting pollution and greenhouse gas emissions.

The aforementioned balanced combination is essential for the success of this approach, so as not to favour, or do a disservice to, any one geographic area. For example,

1. Promoting the regeneration of urban waterfront and town centres is surely essential given that many of these areas are currently run down and, without development, will fall ever more into disrepair (which, as proponents of the *broken windows theory* will attest to, leads to a continual downward spiral of crime, anti-social behaviour and civil disorder)
2. A rural town on the Hoo Peninsula seems unjustly focussed on an area that many people choose to call home predominantly because of its partial isolation. However, this area cannot expect to escape all development, as expansion of the Medway Towns must surely be borne by everyone
3. Wider growth must, as per the above point, be an expectation for all, regardless of location. However, residents should not feel that their communities are being disregarded in favour of unchecked development – rather, smaller sites in suburban areas should allow for some development whilst retaining the character of the place
4. Development within Lodge Hill is, surely, inevitable – whether in 5, 10 or 30 years. Much of Lodge Hill, despite being an SSSI, is brownfield and, with greenfield development already manifesting itself in many places in close proximity, its development is surely a done deal at some point in the future. What is essential is that this is done sympathetically, utilising (rather than overrunning) the area's green lung. Also, with the future of nearby Deangate also coming under scrutiny, and the proposed development of the Hoo Peninsula, surely a wholesale review of the area is required.

As someone who has lived in Medway for over 40 years, I have been fortunate enough to experience the benefits that the area has provided – including housing, jobs and leisure. Medway now seems to be at a pivotal point, when it has the opportunity to regain some of the prominence that it once held (yet which has, for quite some time, been dormant), hence a holistic and long-term view needs to be taken rather than piecemeal steps that will only result in more dissatisfaction.

maryott, kyle

From: [REDACTED]
Sent: 09 May 2018 09:29
To: futuremedway
Cc: [REDACTED]
Subject: Proposed developments on the Hoo Peninsula

Categories: Blue Category

I would like to voice my objection to the amount of housing proposed for the Hoo peninsula in your Development Strategy.

It seems to be very disproportionate to the area that Medway covers. There are many other areas of Medway where development could be placed, without taking away the countryside which gives the Hoo Peninsula its unique qualities and importance for wildlife and migratory birds.

In particular the proposals to develop Lodge Hill and its surrounding area are outrageous. How can developing a SSSI even be considered? We should be doing all we can to protect the wildlife of our countryside so to propose something which could well lead to the demise of the Nightingale is, in my opinion, outrageous .

As I Medway resident for over 30 years I do not wish to see my Council be guilty of such wonton decimation of our ever declining green spaces and urge you to challenge the government over the ridiculously high housing targets set for Medway and South East England and, in particular, to re think where smaller developments could be sited throughout Medway with lesser impact, rather than destroying the heritage of our beautiful countryside.

Yours sincerely
Richard Hammond

[REDACTED]

Sent from [Mail](#) for Windows 10

maryott, kyle

From: [REDACTED]
Sent: 09 May 2018 15:53
To: futuremedway
Subject: Future development of Middle & Lower Stoke

Categories: Blue Category

Dear Sir/Madam

We would like to express our point of view of the above.

We moved to Middle Stoke in 2010 to be out in the countryside away from the town for our future as a retired couple. We love it out here as it's quiet, you know nearly everyone, Lower Stoke have a nice local pub absolutely ideal for retired people who just want to end there days in a peaceful environment & where you do not get too much trouble. We object to more houses going up where you do not know who's moving in or from where.

We know a lot come out of places like London as houses are cheaper here but we do not see them as contributing to the area as they will still work in London, eat there, shop there & so on then when it comes to our grandchildren becoming of age there'll be no chance of them getting on the property ladder or getting a job or a life of independence a lot of our children have there children still living with them because of this.

Regards
Mr & Mrs P Sowter (Peter & Rosemary)

Sent from my iPad

maryott, kyle

From: [REDACTED]
Sent: 26 March 2018 12:17
To: futuremedway
Cc: [REDACTED]
Subject: Rochester bridge

Categories: Blue Category

To whom it concerns

I would just like to say that there has never been a better time to relieve the pressure from rochester bridge since the the old council offices had been taken down.

Surely we must be able to take a new road though what is now the car park, and was formerly the council offices and connect the road between morrisons and the retail park, where a roundabout could be added to further stop congestion. Should this road be added, the people could go straight to the retail park, also allowing people easier access to Cuxton.

This would free up the traffic London bound and the bridge in general. Ian Stoddart

maryott, kyle

From: [REDACTED]
Sent: 09 May 2018 17:59
To: futuremedway
Subject: Have your say

Categories: Blue Category

Mr& Mrs D Baldock

[REDACTED]

[REDACTED]

[REDACTED]

Telephone: [REDACTED]

E-mail [REDACTED]

Planning Policy Team

Reference Future Medway

9th May 2018

Thank you for the opportunity to have a "say on how Medway should grow".

The overall proposals in the 'Development Strategy Consultation' appears to be very comprehensive and challenging.

It appears that the key elements and challenges of this document is the development of the services and infrastructure that are required to meet the increase and development of the number of houses that are required to be built.

It is therefore important that those responsible for planning understand that decisions made now will impact on the future of Medway.

As an example.

Currently permission is being given to convert Bungalows into houses.

In this factual example an additional 2 more rooms were added to a conventional

'2 bedroom bungalow' via the roof space to accommodate additional children to the family.

Assuming that in 20years time the children of the family leave the home there will be a 4 bedroom house for 2 people.

If this trend continues and in the event of some people wishing to downsize to a smaller property, usually those retired and aging people, where will they go?

As it has been highlighted many times via the media that these back-up services need to be given some priority not only for newcomers buying the new properties but also to keep in touch with the aging population within Medway.

Some months ago it was highlighted in the local paper that "bungalows were built in order to give specific people the opportunity to 'downsize' into a smaller property. This was published at the same time that an adjacent bungalow was given planning permission for 3 additional rooms + Bathroom in the roof!

A few years ago there was a government proposal to introduce "A bedroom tax" could this be reinstated at a later date?

I consider that the planning laws require amending sooner rather than later in order to meet current and future requirements and more consideration is given to a better understanding of the impact these developments have, and will continue to have, on the surrounding communities.

Kind Regards,

Mr D.E.Baldock

maryott, kyle

From: [REDACTED]
Sent: 09 May 2018 19:32
To: futuremedway
Subject: gillingham football club sponsorship
Categories: Blue Category

Dear Sirs

I write, once again, to ask if there is a chance that now the Medway Council are sponsoring the GFC, there is any chance that a new stadium at Mill Hill might be considered by the council.

I live in at 568 Grange Road and would be very much affected if i had a multi purpose stadium at the end of my garden.

I am very, very worried and concerned about this.

Thanking you for your kind consideration to my "plight".

Jan Clements
[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 10 May 2018 05:54
To: futuremedway; taylor, adam
Subject: plans for hoo peninsula

Categories: Blue Category

Dear Sirs,

With regards to your proposal to make Hoo St. Werburgh a rural town I would like you to consider the fact that this small area has a very large proportion of horse and pony owners and this is partly what makes it a rural community. To retain this rural feel the needs of this group should be addressed as part of the plan. In the development scenario you have suggested there will be riverside walks, which will be very nice for all the "town folk" who move here with their dogs, but what we need is somewhere to ride our horses. This has already become severely restricted by the growth of the Kingsnorth Industrial and Commercial sites and bridleway RS108 is now pretty unusable due to continuous, noisy construction work and the increase in large and fast lorries passing the point where the bridleway emerges onto the Kingsnorth area.

Those who keep their horses in the Abbots Court area are also cut off from a lot of their previous riding areas by the new gravel pits near Jacobs lane. When I contacted the Public Rights of Way Officer a couple of years ago, he told me that it was hoped a complete coastal path could be constructed around the area and that this would be open to horseriders. This would be fantastic, particularly if it allowed some areas for cantering/galloping.

After the 2012 Olympics, it was hoped we would see an increase in public funding/development of horseriding especially as Greenwich was so close to Hoo. In America many places have municipal horseriding facilities where people who have horses but are not super rich can go and train or just have fun. Deangate would have been an ideal place for something like this but I'm sure there are other places local to Hoo that could also be considered eg Sturdee corner area. The next Charlotte Dujardin could be growing up in our area but will have to move or give up her hobby/passion if your plans do not include her.

I'd be very grateful if you could give these thoughts serious consideration and would be happy for you to contact me if you wish.

Regards.

Alison Woodley

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 10 May 2018 13:28
To: futuremedway
Subject: Is Medway Council about to make a costly mistake?

Categories: Blue Category

Dear Sir/Madam

I am worried that the Medway Planning Team is about to become embroiled in a costly, needless and embarrassing undertaking.

At present, nobody can predict the effects of Brexit on any major financial enterprise. But one thing we do know is that there has already been a significant drop in the numbers of EU citizens being accepted into the UK. Furthermore, large numbers may well leave after March 2019, especially if there is an economic downturn.

This could make Medway Council's proposed housing development at Lodge Hill a big mistake.

Any reduction in immigration will free up local houses, rendering the Lodge Hill development unnecessary. And if there is an economic downturn, it will be cheaper to convert abandoned office blocks into flats. Building brand new homes from scratch - just to see them repossessed - would be an embarrassing waste of council resources.

You only have to look at the fate of the housing estates built in Ireland, just before the 2010 downturn, to see what could happen. The effect on Kent, with its ports and proximity to Europe, could make the Lodge Hill development a costly White Elephant for Medway Council.

Yours from a very concerned Kent tax payer
Mike Slade

From: [REDACTED]
Sent: 10 May 2018 14:45
To: futuremedway
Cc: [REDACTED]
Subject: The future of Medway development

Categories: Blue Category

Dear Sir/Madam,

It is with much anger, frustration and despondency that I write to you with my views on Medway Council's "range of options" re "Future sustainability" for the county.

I must start by saying that all four options seem over-excessive; for us residents it's quite clearly a case of choosing ones poison.

Whilst I appreciate that house building for future generations is important and can't be ignored, I'm struggling to understand the volume that the government – and Medway Council – are proposing; so much so that all the research I've conducted (online, and by talking to people I know who – for example – work for the Civil Service) shows that the actual figure needed to "sustain growth" is actually way lower than the figure the government is stating.

But I also think that pretty much all of your "Average Joe's" – including those with growing families – are equally struggling to comprehend such radical figures...

We'll come to that later. *

I'd like to start by addressing my concerns regarding the number of houses proposed for the Hoo Peninsula. Starting with my own "village", I was staggered to read that an additional 750-plus houses have been proposed for High Halstow; in effect, *doubling* the size of the "village"?

Why? Why destroy such an established, beautiful, only-just-sustainable-as-it-is, village? We know that an initial proposal to build 71 dwellings off Britannia Road ... on land that has long been declared "unfit for building" will go ahead, despite however many arguments and consultations the local parish strive for and fight for. We know too that whatever the inhabitants of the village and the Peninsula in general say and petition for will fall on deaf ears. I dread to think how much money the council has spent – no ... wasted – on "letting the people have their say" Absolutely pointless.

High Halstow has a barely-coping sewage and drainage system as it is; so why even *think* about doubling the number of houses? The developer's going to spend money on a new sewage system when they could spend it on extra houses and get a much bigger return on their investment, are they? I think not.

And why focus so much of the Council's "target" for the Hoo Peninsular full-stop? What about other areas of the county?

Why ruin an area of such outstanding beauty and "scientific interest"? What about Kingsnorth, Capstone or Rainham? At least *consider* sharing the chaos, carnage and destruction out a bit.

Why persist – again and again – with this apparent, over-whelming desire to develop Lodge Hill? (Of course ... I know the reason why. It was a rhetorical question)

I read in a Gravesham Borough Council news article that "the number of birds on the Hoo Peninsula is declining" The tone of the article was that that was a good thing; that it meant more land in the south east was available for development. Well, come and stand outside my backdoor anytime from mid-April to mid-May after 10.00 p.m. and listen to the Nightingales sing. Or lay in bed at midnight and listen to the owls hooting. Or wake in the morning to the sounds of the cuckoos and woodpeckers.

What an annoying inconvenience those damn birds are, eh?

I have an idea: let's turn the village of Hoo in to a small town. It's a fantastic idea. Let's build lots of houses and shops, and create a fabulous new multi-cultural, thriving and prosperous mini-metropolis.

So ... how will these new residents get on and off the Peninsula, you ask? Well, there's the new bypass from the Four Elms roundabout, you reply. What? Cars queuing all the way back down the A289 to the Cooling/Cliffe turn-off every weekday afternoon from just after lunchtime? Now? Before we've even laid the first breeze block? I don't know *what* you're talking about. Anyway, moving on...

There's a doctors' surgery in Hoo. Do you have any idea what the average waiting time is for an appointment? It's between four and five weeks. I know, I tried to book one the other week.

If you build a second, much-needed doctors' surgery in Hoo – and you progress with “Hoo Town” and the “High Halstow Destruction” – sorry – Expansion – the waiting time for an appointment would most likely quadruple. Do you think this is a dramatic, emotive statement? Where do you think the villagers in High Halstow go when they need to see a doctor? Hoo.

And what about the current residents of Hoo themselves? If they say “No” will you simply reply “OK, thanks for your time; we'll go and build somewhere else then”? I don't think so...

“Have Your Say...”

Yes, I *understand* you'll say that it's about “growth” and developing the infrastructure; but look at the expansion of High Halstow twenty years ago: An area of land between The Street and Britannia Road was left clear for a shop and a doctors' surgery. What actually got built? Oh yes, more shops. Flats, actually.

Hospitals? You planning on building two new hospitals in the county? Because one won't be enough.

Have you thought about air pollution? (How many extra cars are you estimating?)

Have you thought about the potential rise in crime? (How many extra police officers will the council be funding?) You happy with the inflation in crime that will – without doubt – increase? Or will you simply say that the rise is proportionally in line with the rise in population. In my book, any increase – whatever the ratio – means a larger number. Comfortable with that?

Where will the new fire station be located? Because you're obviously going to build one. You're going to have to.

Are there really that many people (37,000 homes-worth) that need to move to/to live in Medway?

No; not when you sit down and think about it. Not even by 2035...

This therefore, seems to be an exercise in “stimulating the economy” by focusing on the construction industry.

**“Growth” - economic growth. It's generally perceived that economic growth is only possible by an increase in population. Not true. Particularly now.

Medway are keen to stimulate the economy in the county, to regenerate the prosperity of the area. That's fair, and an admirable goal. Unfortunately, by shifting all of these additional people in, means creating additional jobs for them to do. Unfortunately again, the clear upward trend regarding jobs and wages (If Medway is able to *create* an adequate number) is that – as a country as a whole – we will be shifting more and more towards zero-hour “Contracts” (“Contracts” is in inverted commas here, because to put the words “zero-hour” and “contract” in the same sentence is an insult to anyone unfortunate enough to find themselves employed in such restrictive circumstances) And, zero-hour “contracts” make getting credit – and particularly a mortgage – nigh on impossible.

So, no mortgage equals an up-coming generation of people not being able to get on the property ladder (which we're already witnessing); and, no mortgage means ... who's going to buy the houses the council are proposing to build?

Unless, of course ... there's going to be a disproportionate amount of *social* housing...?

Here's a question: What kind of people are we going to attract – want to attract – to our new swollen, bloated metropolis? Am I right in thinking ... because this is what I've heard ... that we will be taking some of the over-spill from several London boroughs that have recently undergone their own recent re-development? (i.e. the current residents being totally and utterly priced-out of any chance of being able to purchase a replacement dwelling on the same site)

I would love to hear your response to this.

Unfortunately and it grieves me to say this, but, do you think that Joe Public actually *trusts* Medway Council? Do you think we have any *faith* in the Council? Do you, for one moment, consider that – even if the proposed level of growth was needed – we think you’ve got the level of expertise ... and honesty ... and the *integrity* needed to make such a proposal work?

Let’s take Dean Gate Ridge golf course. Just a bit of annual forestry work being carried out; a few trees being chopped back, etc., etc. And then we find it’s actually going to be closed because it’s “making a loss”! Incredible! Where was the consultation there? (I’m talking about consultation *before* somebody on the council saw pound signs in their eyes) The residents aren’t stupid (I’m afraid to tell you) we’ve known that the greedy developers have had their eyes on all those acres for ages. Years, even. Like-wise Lodge Hill! Hence the persistency! Incredible!

And who was responsible for the financial management of Dean Gate Ridge? Not, by chance the same person now looking after Capstone Park, was it?

Dean Gate Ridge closing was a foregone conclusion.

Actually, it’s not about stimulating the economy, about growth, about future generations; it’s about money. Greed. It’s about corruption, brown-envelopes, back-handers, turning a blind eye. Plans for fifty houses on one plot? Oh look, they’ve actually built seventy five. Crammed-*in* seventy five.

Too late! We can’t pull ‘em down now!

When I say corruption, I’m not just talking about the level with which we – the general public – hold the government responsible for; which we all know is outrageous (Just think “Expenses”) I’m talking about those little things that we might not – unless we stopped to really think about it – lose any sleep at night over. Little things like: granting permission here, granting permission there; an industrial estate here, an industrial estate there (... that hadn’t been discussed...) All those little extras that line someone’s pocket in exchange for greasing someone else’s palm.

A slanderous accusation? Possibly; and *not* aimed at everyone. But perception? ... One hundred-and-ten percent. And we *all* know what they say about perception, don’t we: “Perception is reality”

I wonder how many councillors will have the bulldozers out the back of *their* houses come The Big Build? Not many, I would wager.

I’ve just spent two and a half hours of my time writing this; I’ve probably spent a hundred-*times* that: thinking about it, worrying about it, feeling angry about it. What a waste of time though, eh? What a total and utter waste of my time – and everybody else’s who’ve done like-wise over this beautiful peninsula.

I’d just like you to stop a minute and think about what you’re contemplating; *yes* we need houses, *yes* we need to think about the future – but to the proposed level of un-reversible development being contemplated? Really?

Just take a slow drive along Christmas Lane in High Halstow, preferably around 6.00 a.m. just after the sun’s come up. Drive from the pub towards the Grain/Stoke roundabout. Pull in to one of the passing places and stop for a moment. Take a look to your left. It’s stunning. It’s beautiful. It’s heart-breaking.

Because once it’s gone ... it’s gone forever – along with everything that made this once beautiful peninsula what it was.

Faithfully yours

John Colleer

John Colleer, Linney, Adamsway, Mansfield, Nottinghamshire NG18 4FL, UK
[REDACTED], www.linney.com

LINNEY 

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From: [REDACTED]
Sent: 10 May 2018 16:54
To: futuremedway
Cc: bull, andrew
Subject: Medway local plan comments

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Blue Category

Dear Sir/Madam,

Many thanks for consulting Sport England on the latest draft of Medway's local plan.

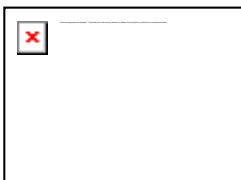
I am pleased to note that Sport England's previous comments have been taken into account and I now consider the appropriate policies to offer a good level of protection for playing fields and sports facilities as per the NPPF. Sport England is supportive of this.

With regard to the provision of new playing pitches, I would suggest it would be useful if policy I8 specifically references the Medway Playing Pitch Strategy in order that both applicants and development management colleagues are clear.

I can confirm that Sport England continues to **object** to the loss of any playing field site and as such will object to the allocation of the sites listed on p143 unless playing field land is replaced by equivalent or better provision.

Sport England is supportive of plans outlined in Section 7 - natural environment and green belt, which suggest opening up access to the river for both walking and cycling. Where appropriate, provision for water-based sporting activity should also be considered. A riverside link between Medway and Maidstone would provide an excellent opportunity for walking and cycling

With regard to Section 8 - Built Environment - Promoting High Quality Design - I would strongly encourage a reference to Sport England's Active Design guidance, which is supportive of Medway's design to foster residents' health and wellbeing. It can be found at <https://www.sportengland.org/facilities-planning/active-design/> and focuses on encouraging activity in everyday lives.



Active Design - Sport England

www.sportengland.org

Encouraging activity in everyday lives. Active Design is about designing and adapting where we live to encourage activity in our everyday lives.

I hope you find these comments helpful; please do not hesitate to contact me should you have any queries.

Kind regards,

Laura

Laura Hutson MRTPI
Planning Manager



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From: [REDACTED]
Sent: 10 May 2018 16:25
To: futuremedway
Subject: Medway Plan Response to Consultation

Categories: Blue Category

Dear Medway Council

I would like to register my response to the proposed new Medway Plan .

As a resident of Rural Medway since 1988 - 12 years in Higham and 18 to date in High Halstow I am dismayed to see that the Hoo Peninsula has been designated to have so much proposed development within the New Medway Plan ! A Lions share I would say !!

I accept that some extra homes are needed in Medway indeed in the whole of Kent but looking at the 4 options of the Medway plan it is obvious that MOST of the development is focused on the Hoo Peninsula - I do think that this is wrong and that every Community in Medway must really and fairly take it's share.

I also do NOT accept that Medway can accommodate 27000 more homes between 2017 to 2035. I feel that the Council must show that they are doing everything possible to get Government to agree that this large figure is unsustainable for Medway. Please lets not just roll over and accept this unrealistic requirement - that would be the easy route !

Also 10-12000 Homes on the Peninsula is far too many and I feel would totally destroy the special place that the Peninsula is, which is a peaceful wild and beautiful place where people come to escape the busy and overcrowded towns for respite and calm. That is why I and other like minded people choose to live there.

I have read that the Council admits that the number of residents in Medway is NOT increasing as fast as it was so surely the Council should re-calculate and reduce the total number of houses it needs ?

I personally want and need the Masterplan to consider the people who already live on the Peninsula so that any new housing fits in with their lives and communities and doesn't ruin or destroy people's lives !

Looking at the Consultation document it is impossible at this early stage to determine the number of new homes are allocated to the Peninsula so could the Council work with our Parish Councils and Local Residents as to what could be included in a local plan before any Housing applications get passed so we can agree what houses, transport infrastructure (including public transport) , doctors, schools and shops are needed and where and when. I and others would welcome a Pledge from the council to end Piecemeal development on the Peninsula until the Masterplan is totally in place.

I believe the Council hasn't explored several key options that are essential - For example an Attractive development at Kingsnorth, Capstone and Rainham and what about redevelopment of Chatham town centre with Housing options - Surely these are options worthy of consideration and not just dismissed ?

The Council must share with the people of Medway the plans they have for New Roads and Railways on the Peninsula that would support their proposed extreme re-development program and also for tackling Air Pollution which is currently poor on the Peninsula.

The New Plan must also have more detail about the future of Hospitals in Medway including a Timetable and locations - our Existing Hospital struggles greatly already without 27000 extra homes being added to it's workload !!

I want the Council NOT to Sacrifice protected places , such as Lodge Hill SSSI. Protected places such as this and others should be Medway's Trump Card to say to Government - NO we have nationally and internationally protected places here there is a genuine limit under national rules as to what Housing can go here !!

I hope that mine and others responses will help persuade Medway Council to enter dialogue with our Local Parish Councils to work together towards a Mutual and Sustainable Future Plan for Medway that will retain much of our valued and special places within Medway whilst giving us a manageable amount of new homes into 2035 in areas that desperately need regeneration.

It's not just a matter of looking on a map and drawing red lines around green open space areas - It's not that easy and once these areas are gone they can't be given back.

I hope that my comments will be given some consideration in determining the next stage of this new plan please.

With best regards

Mrs Sheryl Farrow

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From: [REDACTED]
Sent: 11 May 2018 10:22
To: futuremedway
Subject: Future Medway Proposals

Categories: Blue Category

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Gemma West

11/5/18

Sir /Madam,

I refer to the March 2018 documents relating to The "Future Medway, Development Strategy Consultation Introduction".

I have read this with absolute disbelief as it appears to suggest building on Greenfield land immediately behind/adjacent to properties in Anchorage Close thus interfering with the occupant's privacy and significantly reducing property values.

Furthermore, when there are a considerable number of available Brownfield Sites the reason behind Green field sites being potentially earmarked for development has nothing to do with a strategic master plan but developer greed and financial advantage to all concerned except those individuals affected by it!!

Safety has to be of paramount importance and with the recent air accident almost over the green field in question it is difficult if not impossible to see the reasoning behind this building consideration.

The transport infrastructure of the area is so limited that the thought of further housing with hundreds of extra people using the very limited bus service that we currently have is nothing short of ridiculous. The current residents accept this failing as we chose to live here, if it is worsened by overloading it, then the system would be unsustainable in its current guise. The statement "WE CHOSE TO LIVE HERE", needs further consideration, backing on to farmland and therefore the quality of life and housing prices at the time reflected this advantage, presumably Medway Council will offer compensation or perhaps a house purchase scheme to those adversely affected.

The passenger railway was removed in the late 50's early 60's with no replacement since, once again this promotes the thinking, why build here when brownfield sites with excellent transport infrastructure are already available, thus further proof that these thoughts are finance led!!

Due to the aforementioned poor (almost non-existent transport infrastructure), the fact that amenities are insufficient for current inhabitants let alone hundreds more and where are these people going to go for schooling, doctors or even worse, hospitals.

With below average employment possibilities in the area any extra people will have to travel considerable distances by car, thus making roads busier and increasing pollution. Ok, some may say well we have the electric car revolution, do we have any charging points or will the proposed new residents have to trail charging cables across the pavements endangering pedestrians etc etc.

Within the 400 page document within some "Comments Section" it advises that Medway should be "A PLACE TO BE PROUD OF" where "EVERY CHILD HAS A GOOD START IN LIFE".....Lets puts this comment into perspective. You build umpteen houses on a farmer's field under a light aircraft flight path that has had a recent fatal accident, you have insufficient schooling places already and insufficient medical assistance for those there already, it is an area so close to a flood plain and one that is not currently on mains drainage, has little transport infrastructure and certainly no railway. There is a lot more to this suggested planning proposal than meets the eye and you can be assured that residents of Middle Stoke will not only investigate fully the reason behind the consideration but we will fight this all the way. We understand that the landowner in this case is on the Parish Council so will no doubt endeavour to bulldoze this through to his financial advantage.

Come on Medway Council. Why destroy a greenfield site with gay abandon to make various parties even richer than they are now when you have more than suitable sites elsewhere with all the infrastructure requirements to human habitation in place.

Regards

Gemma West (Mrs)

10 May 2018

Jones Lang LaSalle Ltd

jll.co.uk

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

futuremedway@medway.gov.uk

Dear Planning Policy Team,

Medway Local Plan 2012-2035 Development Strategy Consultation – Potential Employment Allocations

On behalf of the Ministry of Justice (MoJ) JLL is instructed to submit comments on the Medway Local Plan Development Strategy document.

MoJ welcomes the Development Strategy document and supports the sites identified for ‘expansion &/or intensification of existing employment areas’ within the Potential Employment Allocations section.¹

In particular, the MoJ supports the allocation for expansion and/or intensification of employment areas in the vicinity of Rochester Airport as identified in the Potential Employment Allocations document, including land bounded by Maidstone Road to the east and the M2 motorway to the west, to the south of HMP Rochester and HMYOI Cookham Wood. Sites allocated in the vicinity of Rochester Airport are identified in the Medway Strategic Land Availability Assessment (SLAA) dated January 2017 and MoJ has an interest in site reference 0773.²

The land comprising site 0773 is bounded immediately to the north by the Royal Mail depot. The land comprising site 1055 is bounded to the south by the border of your neighbouring authority, Tonbridge & Malling Borough Council.

Planning permission (reference 17/02655/FL) was granted in February 2018 by Tonbridge & Malling Borough Council for B8 and B2 uses for land immediately to the south of the Medway border, adjoining site 1055 as per the Medway SLAA as follows:

Hybrid planning application: (A) Full planning application for the creation of a new vehicular access to Rochester Road, the erection of buildings with up to 2,226spm of floor space for storage, distribution use and wholesale trade distribution (Class B8) and/or use for general industry (Class B2) including layout of internal road and hardstanding with the installation of services (Phase 1). (B) Outline planning application with all matters except access reserved, for the erection of buildings with up to 2,021spm of floor space for use with storage, distribution, wholesale trade distribution (Class B8), general industry (Class B2) and/or offices (Class B1) including the change of use of up to 1,470spm of open land to storage and distribution (Class B8) and the layout of internal roads and hardstanding with the installation of services (Phase 2) | Land West Of Rochester Road Rochester Kent

¹ See: https://www.medway.gov.uk/download/downloads/id/2078/potential_employment_allocations.pdf last accessed 10/05/2018.

² See: https://www.medway.gov.uk/download/downloads/id/162/slaa_main_report_-_january_2017.pdf last accessed 10/05/2018 Map 10.

The Kent Downs Area of Outstanding Natural Beauty (AONB) was considered in the Officer's Report.³ Paragraphs 6.8 to 6.14 consider the impact of the development for this B8 and B2 scheme on the surroundings and AONB.

In particular, paragraph 6.11 and 6.12 state:

- 6.11 *The general topography of the area is such that the majority of the AONB is significantly lower than the application site. This means that views from it towards the application site are generally upward. The angle of view means that little of the buildings would actually be visible and the roof form of the new buildings would not significantly break the skyline. The existing vegetation around the site boundaries would also assist in the reduction of the impact of the site on views into the area from the surrounding AONB. The setting of the site in relation to the AONB is distinct due to the physical separation as a result of the M2 and the escarpment.*
- 6.12 *As a result it is considered that given the physical form of the site, positioned on a well screened plateau at the top of a man-made escarpment, and its separation the development would not have an adverse impact on either the setting or the functioning of the AONB in terms of landscape and habitat. The site is of low ecological value and by retaining boundary vegetation would ensure that there is no loss of potential bat foraging corridors or bird nesting sites, the loss of which may have been contrary to the Wildlife and Countryside Act 1981.*

The MoJ welcomes the approach taken by Tonbridge & Malling Borough Council's planning officers in this location. The MoJ considers the land identified in the Potential Employment Allocations section of the Medway Local Plan 2012-2035 Development Strategy, in the vicinity of Rochester Airport, and in the SLAA identified as sites 0773, 0840 and 1055, to be homogenous with the adjacent consented land. The MoJ considers that plot 0773 should be allocated for expansion and/or intensification of employment uses.

Yours faithfully,

Ryan Gerrish
For and on behalf of
Jones Lang LaSalle Limited

³ See: https://publicaccess2.tmbc.gov.uk/online-applications/files/403CC13CD140A1293A5B8E07D4E17ABE/pdf/17_02655_FL-COMMITTEE_REPORT-928026.pdf last accessed 10/05/2018.

From: [REDACTED]
Sent: 11 May 2018 14:36
To: futuremedway
Subject: Future Medway Response

Categories: Blue Category

Dear Sir,

Reference the development strategy consultation; comments as follows:

General comments:

1. I support urban regeneration and think that most new development should be confined to there. I believe there are more potential development sites around Lower Rainham Road which does not feature in your proposals.
2. I believe that the scale of proposed development on the Hoo Peninsula is incompatible with a policy of 'conserving our natural environments' and thus should be scaled back.
3. The possible doubling the sizes of High Halstow, Stoke and Allhallows is NOT acceptable. I think the words used in your previous submissions were 'incremental' growth for the villages; this would not be incremental but a massive leap which is not compatible with your stated policies.
4. Development should also be shared with Cliffe and Cliffe Woods which seems to have escaped any attention whatsoever. This would be valuable in two ways; firstly obviously relieving some of the pressure on previously mentioned villages, and secondly taking traffic away from the A228.
5. There would need to be a substantial and clear gap between any development in High Halstow and the hamlet of Sharnal Street, which could be partially swallowed thus losing its identity.
6. The 'country town' proposal for Hoo needs very clear objectives and constraints and moreover should contain cast iron guarantees, by surrounding it with protected land, to prevent urban sprawl eating into the countryside in future. I believe also that the amount of development proposed is unacceptable and should be scaled back.
7. Surely whatever plan is adopted, Lodge Hill MUST be included as it would be largely on brownfield land. I do not understand why it does not feature in every scenario. Further, I do not understand why inclusion of Lodge Hill should 'remove the need to allocate land for development in Stoke and Capstone Valley'. Surely the relief should be shared around the Hoo Peninsula generally, not the edge of an urban area; namely Capstone Valley.
8. One must remember your predictions of housing requirements may well change in the post 'Brexit' era.

Scenario 1: Using brownfield land before any other land is used is the most sustainable and acceptable way of managing development; particularly as it does not use valuable greenfield sites which in the end may not be required post Brexit, thus saving them for the whole community.

Scenario 2: Cannot understand the possibility of using the Grain Railway without attracting large numbers of commuters using their cars to get to a station; where a large car park would need building. It would run counter to most of your development goals viz the natural environment, as the line does not run conveniently close enough to any villages for foot passengers.

Scenario 3: I think this is unacceptable and not sustainable, and maybe not required post 'Brexit'.

Scenario 4: I refer to point 7 above and would submit that as my response to this scenario:

Surely whatever plan is adopted, Lodge Hill MUST be included as it would be largely on brownfield land. I do not understand why it does not feature in every scenario. Further, I do not understand why inclusion of Lodge Hill should 'remove the need to allocate land for development in Stoke and Capstone Valley'. The relief should be shared around the Hoo Peninsula generally, not the edge of an urban area; namely Capstone Valley.

Thank you for considering the points I have raised.

Kindest regards
Peter Richardson

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 28 March 2018 15:13
To: harris, dave; futuremedway
Cc: [REDACTED]
Subject: Medway Development Options Site - 1183, Rainham Library
Categories: Blue Category

Dear Dave,

I note the development options in all scenarios include site 1183 - Rainham Library. Although I know the Council is fully committed to library services in Rainham, David and I do not think it is acceptable to bring this site forward in the Local Plan without a corresponding plan for Rainham library services.

We therefore request this site is removed as a development option in the Local Plan.

Best regards
Martin

Cllr Martin Potter
Rainham North Councillor

[REDACTED]

From: [REDACTED]
Sent: 11 May 2018 14:38
To: futuremedway
Subject: Future Medway Response

Categories: Blue Category

Dear Sir,

Reference the development strategy consultation; comments as follows:

General comments:

1. I support urban regeneration and think that most new development should be confined to there. I believe there are more potential development sites around Lower Rainham Road which does not feature in your proposals.
2. I believe that the scale of proposed development on the Hoo Peninsula is incompatible with a policy of 'conserving our natural environments' and thus should be scaled back.
3. The possible doubling the sizes of High Halstow, Stoke and Allhallows is NOT acceptable. I think the words used in your previous submissions were 'incremental' growth for the villages; this would not be incremental but a massive leap which is not compatible with your stated policies.
4. Development should also be shared with Cliffe and Cliffe Woods which seems to have escaped any attention whatsoever. This would be valuable in two ways; firstly obviously relieving some of the pressure on previously mentioned villages, and secondly taking traffic away from the A228.
5. There would need to be a substantial and clear gap between any development in High Halstow and the hamlet of Sharnal Street, which could be partially swallowed thus losing its identity.
6. The 'country town' proposal for Hoo needs very clear objectives and constraints and moreover should contain cast iron guarantees, by surrounding it with protected land, to prevent urban sprawl eating into the countryside in future. I believe also that the amount of development proposed is unacceptable and should be scaled back.
7. Surely whatever plan is adopted, Lodge Hill MUST be included as it would be largely on brownfield land. I do not understand why it does not feature in every scenario. Further, I do not understand why inclusion of Lodge Hill should 'remove the need to allocate land for development in Stoke and Capstone Valley'. Surely the relief should be shared around the Hoo Peninsula generally, not the edge of an urban area; namely Capstone Valley.
8. One must remember your predictions of housing requirements may well change in the post 'Brexit' era.

Scenario 1: Using brownfield land before any other land is used is the most sustainable and acceptable way of managing development; particularly as it does not use valuable greenfield sites which in the end may not be required post Brexit, thus saving them for the whole community.

Scenario 2: Cannot understand the possibility of using the Grain Railway without attracting large numbers of commuters using their cars to get to a station; where a large car park would need building. It would run counter to most of your development goals viz the natural environment, as the line does not run conveniently close enough to any villages for foot passengers.

Scenario 3: I think this is unacceptable and not sustainable, and maybe not required post 'Brexit'.

Scenario 4: I refer to point 7 above and would submit that as my response to this scenario:

Surely whatever plan is adopted, Lodge Hill MUST be included as it would be largely on brownfield land. I do not understand why it does not feature in every scenario. Further, I do not understand why inclusion of Lodge Hill should 'remove the need to allocate land for development in Stoke and Capstone Valley'. The relief should be shared around the Hoo Peninsula generally, not the edge of an urban area; namely Capstone Valley.

Thank you for considering the points I have raised.

Kindest regards
Valerie Richardson (Mrs)

[REDACTED]

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

Our ref: KT/2006/000047/CS-05/IS1-L01
Your ref:

Date: 11 May 2018

Dear Sir/Madam

Medway Council Development Strategy and Habitat Risk Assessment

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

DEVELOPMENT STRATEGY

Groundwater and Contaminated Land

We are generally happy with land contamination and environment and water protection policies. They cover most of our concerns raised through the direct consultation process. The Land contamination and Brownfield section could specifically mention landfill and development nearby perhaps. Dartford cover this aspect well and it may be worth looking at possible shared policy wording.

We believe the infrastructure policy on strategic sewer provision could be strengthened by linking to Groundwater protections needs as well. Shepway did this quite well recently we recall. Some rural areas of Medway, on the downs etc are not best served with mains sewer and any development, albeit smaller scale than main areas, need to consider infrastructure needs. In areas like Hoo St Werbough with large expansion plans then early provision of sewer/ treatment infrastructure ahead of construction needs careful consideration.

Water Resources

Main Document Section 7.37 needs reviewing as is difficult to understand. Here and in section 10.19, Medway is an area of serious water stress as identified by the Environment Agency.

Sections 8.10, 8.11& Policy BE2 - we support these policies.

Flood Risk

We have no major concerns with the consultation documents, however we would suggest that sections refers to both the Thames Estuary 2100 plan, and the emerging Medway Estuary and Swale Strategy as relevant policy documents.

We are pleased with, and support, the inclusion of policy NE7 and reference to flood risk management.

Environment Management - Waste

Controlled waste

Proposed sites of excavation which generate construction and demolition wastes must thoroughly assess such wastes as the producers of those materials to determine their characteristics, long term behaviour and to establish if the material is waste in line pertinent

Environment Agency

[Redacted]
[Redacted]
[Redacted] gov.uk
[Redacted]



INVESTOR IN PEOPLE



legislation namely, the Environment Protection Act 1990 and Waste Regulations (England & Wales) 2011. All material subject to waste controls which leave the site of production must be accompanied by a written description. Secondary aggregates produced from the treatment of inert wastes must fully meet the terms of the Quality Protocol and produced under the authorisation of an Environmental Permit to meet end of waste status. Any site involved in waste importation, storage, transfer, deposit and/or treatment operations being undertaken at any site if not subject to any other exemptions or authorisations will require an Environmental Permit to be in compliance with the Environmental Permitting (England and Wales) Regulations 2016. Further guidance on permitted activities can be found on the GOV.UK website.

Mining waste

Any mining and extractive activities being proposed at a site giving rise to waste and forming part of the mining process will require a Mining Waste Permit under the Environmental Permitting Regulations 2016 for example the washing of quarried or extracted materials producing waste washing liquors or sediments. Additionally, an Extractive Materials Management Plan and statement will need to be submitted to the Environment Agency to assess products, by-products and waste materials arising from the sites activities if this has not already been assessed or discussed with us. Where a permit is required pre-application discussions will need to take place with this applicant where advice and guidance can be given regarding these proposed waste management activities. Further guidance on permitted activities can be found on the GOV.UK website.

Marine Environment

General – estuarine/marine waters

We are pleased to note the document recognises the importance of the Medway estuarine environment and its associated environmental designations, and also that it recognises that policies for managing and improving the water environment have been developed through the Thames River Basin Management Plan, among other documents. The Consultation Report also notes that the Marine Management Organisation (MMO) is preparing a marine plan for the south east that will provide guidance on managing marine development and activities.

Water Framework Directive (WFD) and water quality

We would expect that, where appropriate, proposals for waterside development including all activities below Mean High Water Springs will in due course be subject to the requirements of a Marine Licence from the MMO. We will be able to provide detailed comments on any WFD water quality implications for such proposals through our capacity as a statutory consultee to the MMO. Marine Licence applications must be accompanied by a WFD assessment which follows the 'Clearing the Waters for All' guidance, which has been published on the GOV.UK website at: <https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters>.

Development and sewage works

We would expect that the implications of proposed development for existing sewage works in the Medway area will be fully assessed by IEP teams to ensure that there is sufficient 'headroom' in the environmental permits.

Marine Ecology

Looking Through the plans we can see an issue regarding an increase/encouragement of water related activities including water taxi services. Any water related development that puts pressure on habitats within Medway towns above the baseline needs careful consideration regarding protected species and such development needs to be directed towards areas where there is existing traffic infrastructure to support this activity including

making use of existing piers and harbours and not to build new ones over already squeezed habitats.

Fisheries, Biodiversity and Geomorphology

Question NE 1

1. We support this policy subject to the buffer zones for any given activity are sufficiently big and support the use of the SAMMS to help mitigate for impacts in the designated sites

Question NE2

1. It is good to see consideration given to Local Wildlife Sites, and we hope that this remains irrespective of other National Planning Policy changes.
2. Development should always provide enhancements for the environment and biodiversity in particular.

Question NE3

No comment

Question NE4

No comment

Policy NE5

This should be re-written:

New development **must** provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.

Question NE5:

If re-written, yes.

Question NE6

No comment

Policy NE7: Flood and Water Management

Explicit reference to the Water Framework Directive is required in this section.

Question NE7

Yes subject to a clearer explanation of the reasons for our shared interest in the provision of good water quality in all water bodies – rivers, seas and groundwater.

Question NE7

No comment

HABITATS RISK ASSESSMENT

For consideration in future work:

On p28, Table 5: Summary of Potential Impacts within the Scope of the HRA, there is the suggestion that Habitat (& species) fragmentation and loss will be affected by “Introduction of invasive species (predation)”. This is too simplistic as the effects of INNS are much wider than this.

For example, *Didemnum vexillum*, the carpet sea squirt, has a major effect simply through exclusion of other species and smothering of flora and, mostly, fauna on the sea bed. This is not a predatory impact.

Other non-natives e.g. Red Valerian can act to exclude terrestrial species or influence the feeding behaviour of native species.

In the same table, there is reference to Disturbance by Noise. As work on the plan progresses, this should include noise in the marine environment both from marine boat traffic (a transient but ongoing phenomenon) and noise from exploratory work or construction in the aquatic environment (a temporary but occasionally intense occurrence).

In 7.2.3 Mitigation Measures, there is reference to provision of “adequate facilities for recreation . . . particularly for dog walking on and off the lead.”

This measure needs to be accompanied by local legislation and enforcement otherwise it will not be effective in achieving its stated aim.

Policy NE7 We support proposals to expand the policy “to ensure that major proposals for new development demonstrate that there are, or will be, adequate water supply and waste-water treatment facilities in place to serve the whole development”.

8.1.3 Policy H7: Houseboats is of interest to the Environment Agency given the regulatory position on discharges from them and the impact that they can have on water quality and on geomorphology of the coast and coastal features – when moored in large numbers rather than singly.

10.4 Further Steps

Given the emerging National Planning Policy Framework, it is assumed that in future work, there will be a presumption in the Local Plan that all development will result in net gains for biodiversity and the wider environment at all times and in all places, accepting that this might be by compensation or off-setting.

We hope you find our comments useful.

Ms Jennifer Wilson
Planning Specialist

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Development Plan Review – 180500

Introduction

The Medway Local Plan – Development Strategy Consultation document of March 2018 and the Sustainability Appraisal document published in April 2018 are both written such that the concept of climate change is paid lip service, whereas it should be a major objective highlighted at the beginning of each document. There is the consequent lack of focus on the energy impacts of various policies.

It is both interesting and rather sad to contrast the equivalent document produced 3 years ago by the City of Exeter (see Appendix); in that document climate change mitigation is Objective #1 – on P.1!

Indeed the first mention of climate change in the Medway Local Plan is on P. 31; we then have to wait until P.198 , buried with Minerals and Waste, for any discussion despite the phrase being scattered through the document under many headings.

The recommendation is therefore to modify the Local Plan format to give much more prominence to Climate Change and Energy Planning. Further, much more emphasis should be placed in all sections of the Local Plan to assess the energy and emission consequences of the strategies laid out in the Plan.

No real progress will be made unless the Council provides significant leadership in this area, cooperating actively with not just the major developers and contractors but with the major network utility companies who must provide the infrastructure for a successful future for Medway.

Main Areas

The lack of focus noted above then leads to very weak or no expressions of interest and engagement with key areas such as: –

- 1. Long-term optimisation, integration and control of strategic and local utility networks for electricity and gas.**

2. District Heating Schemes

Opportunities are being ignored to require such schemes as an essential part of the infrastructure in current development projects such as Rochester Riverside and the Winget's Strood site. In all likelihood this is the same for other current medium to large-scale housing schemes being developed in the Medway area. It is surely worth investigating for the Riverside schemes the use of heat pumps using Medway tidal water for space heating such as has been installed in Pimlico. This could also be integrated with a gas turbine power generation installation with heat recovery.

3. Local Energy Networks including Renewable Energy

- a. Lack of strategic involvement with the rapidly evolving renewable energy network in North Kent for both solar and wind assets, especially offshore
- b. Installation of local energy generation as a complement, e.g solar PV on housing and apartment buildings, perhaps owned and/or operated by a local ESCO.

4. Introduction of microgrids and local energy storage

5. Small area (up to 20 houses) energy management schemes

6. Electric Vehicle charging point networks

7. Distributed Energy Resource Management Systems (DERMS)

Installation and use of DERMS systems to regulate the supply/demand requirements of Categories 2 – 6

8. ESCO's.

Possibilities and benefits with publicly owned Energy Service companies (ESCO's) for Medway, in cooperation with other local authorities. Such a scheme/schemes would be similar to those already pioneered in cities like Bristol and Nottingham.

9. Community involvement with local ESCO's

10. Smart Cities

Smart Cities approach for Medway to integrate utility networks information and control schemes to a consistent standard.

11. Industrial Sector Background

The pace of change in the energy industries over the last few years has been the most intense seen for more than a century. Many of the concepts outlined above have therefore been under intensive development and deployment for several years in many locations all round the world. An outline description was included in a submission by the author to Medway Council late last year, a submission that was never acknowledged. A copy is attached.

British consulting engineers and contractors have already built up a significant background of experience as a result of the work being done worldwide. The main requirement is therefore a strategic change of thinking and direction, rather than extensive technical innovation on many fronts with its attendant risks. Now the risks are more of being left with a larger obsolete infrastructure due to inadequate integrated forward planning.

12. Data Sources , Reporting and Forecasting

Several reports on Renewable Energy were produced both by Medway and other local councils, as well as Kent County Council in the period between 2009 and 2012. Unfortunately these pioneering works have not been kept up-to-date as far as the author can trace for the Medway area. Such work should be properly integrated with the Sustainability Appraisal and the Medway Local Plan – Development Strategy Consultation.

The availability of energy usage data from the ONS (Office of National Statistics) should mean that detailed and updated datasets are available. These are a first-class base for future energy and CO₂ / Climate Change Impact forecasting, the results of which should then be readily available as part of the Sustainability Appraisal reports, detailed at least to ward level. An early example from Rother is attached.

From that base therefore, every significant housing and industrial development submissions should then be required to submit a detailed Energy Impact Statement complete with its own forecast dataset as the basis for their detailed Energy Plan, rather as architects, housebuilders and landlords already do with EPC/DEM calculations and certificates for individual buildings .

Appendices

Because of their size, these appendices are provided as separate files with this submission

- 1. City of Exeter Development Plan 2015**
- 2. Rother District Energy Demand Tables (example)**

NB. This is one summary report by ward, derived from a much larger Excel spreadsheet with many sheets, copy of which is available. It was developed but not updated because of a change in circumstances.

- 3. Medway Energy Plan Outline - Nov 2017**

From: [REDACTED]
Sent: 11 May 2018 16:51
To: futuremedway
Subject: MEDWAY COUNCIL LOCAL PLAN 2012-2035 : DEVELOPMENT STRATEGY CONSULTATION REPORT

Categories: Blue Category

Dear Sirs,

I offer here some thoughts from the City of Rochester Society on the Development Strategy consultation report,

Whilst broadly content with Medway Council's proposals as set out in its Development Strategy Consultation Report, the Society has a number of comments and criticisms, as set out below:

Medway's strength and distinctiveness in relation to other conurbations – Brighton and Hove and Plymouth are two quoted in the report – is that it comprises a number of very different communities and, as the report rightly says, future growth needs to respect the distinctiveness and history of its separate towns and villages. Unfortunately the authority's preference seems to lean more towards merging those communities into one and playing down their distinctive qualities.

As to future development we fully endorse Policy BE1 'Promoting High Quality Design'. This envisages that development will be permitted where (for example):

- the scale and form of development is appropriate to its surrounding context;
- the historic environment is protected and enhanced;
- development 'responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site'.

All this is very important to Rochester city centre conservation area, where recent development proposals already appear to be riding roughshod over these laudable aims. We would urge the authority very strongly to have regard to its own conservation area policies.

The Society is concerned about the authority's desire to make Chatham the 'principal town centre'. We take issue with the statement (in Policy RTC1) that Chatham is the main location for.....leisure, culture and tourism. Whilst accepting that the Historic Dockyard and – to a lesser extent – Fort Amherst, have a big part to play in the leisure and tourism element of the economy of the Medway Towns, there can surely be little doubt that in terms of culture and tourism the focal point of the towns is Rochester's historic city centre with its wealth of historic buildings and riverside location. At present there is very little to attract tourists to Chatham town centre, its once thriving heart having been torn out by a succession of ill-conceived developments and traffic diversions. Moreover, changes in the pattern of shopping have led to the dramatic decline in the number and quality of shops for which Chatham was once noted. Out of town centres and on-line shopping have led the flight from centres such as Chatham. Town centres are becoming less the preserve of the big 'chains' and increasingly the focal point for small independent specialist shops which appeal to tourists as well as to local shoppers.


Although Chatham is not strictly within our area of interest, our view is that the long-term aim should be to gradually reduce the size of Chatham's sprawling shopping area, thus enabling more of the land there to be released for residential development, contributing to the number of new homes which the council are required to provide over the period of the Local Plan. The topography of the centre of Chatham is such that it could withstand more high-rise housing development than some other areas of the Medway Towns, without having a great impact on the landscape. A denser residential area, combined with a more compact shopping centre and the town's good public transport links would have the potential to make Chatham into the more vibrant centre which the authority seeks.

A good example of the in-town, smaller, more compact, shopping centre, is Strood, which appears to be 'on the up' in contravention of the national trend. An abundance of modest-sized and increasing quality food outlets, and reasonably convenient parking, make Strood the in-town destination of choice for many shoppers now.

In cultural terms we would assert that Rochester has more to offer than the other towns and that this is not adequately reflected in the report. Music and art feature large in Rochester's cultural landscape and some elements of these seem to be unknown to, or ignored, by the writers of the report. England's second oldest cathedral has a very strong musical tradition; there is a strong – albeit very different – musical tradition in the pubs and clubs of the city centre, drama flourishes at Medway Little Theatre more than anywhere else in the Towns, and the castle concerts have become nationally known. Also there are smaller – but highly regarded – musical offerings such as those at Restoration House.

Elements of Rochester's incredible history – and its world-wide impact – remain unknown to many people. Its industrial heritage is still poorly celebrated and few seem to have even heard of the *Textus Roffensis*. Thought to contain the earliest texts in the English language and, through its influence on Magna Carta and, more recently, the United States' constitution, it is of world-wide importance. Despite recent valiant efforts by the cathedral and Rochester Bridge Trust, so much of Rochester's history remains hidden to most people. For the economic future of the Medway Towns there is still much benefit to be 'mined' from Rochester's past and promoted in the wider world.

Yours sincerely,

Alan Moss
Chairman


Response to the Medway Council Local Plan 2012 - 2035

1. Response to Question HC1- Do you agree with the council's proposed approach to managing Hot Food Takeaways?

- 1.1 We have considered Question HC1 and its supporting text with regard to the principles set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework.
- 1.2 We consider that limiting the location and concentration of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices.
- 1.3 There is no adequate evidence to justify the underlying assumption that the location of A5 uses cause adverse health consequences, which would in turn have negative land use planning consequences.
- 1.4 By answering questions RTC15-RTC19, this will also answer question HC1 in full given a degree of overlap.

2. Response to Question RTC15 & Question RTC17 - Do you agree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area? And– Do you think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above?

- 2.1 The suggested restrictions, take an ambiguous view of A5 uses in relation to location and concentration. It would apply an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.
- 2.2 Thus it is inconsistent with Para 19 and 21 of the Framework. Para 19 states:
- 2.3 *Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.*
- 2.4 Para 21 states:
- 2.5 *Investment in business should not be over-burdened by the combined requirements of planning policy expectations.*
- 2.6 The Framework cannot be interpreted to provide generic restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in Para 158 of the Framework which states that each local plan should be based on adequate, up-to-date and relevant evidence. Compliance with the soundness test is still required.
- 2.7 The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. Such a policy could potentially stifle economic development and is not consistent with the Framework.

3. Response to Question RTC18 - Do you think that such uses should be restricted near schools and youth facilities?

- 3.1 There is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. We confirm this at **Appendix A**.
- 3.2 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation *'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.'* It instead highlighted the need to *'develop a higher quality evidence base'*.¹
- 3.3 This lack of evidence has been confirmed in a number of planning decisions. For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating *'the evidence base does not adequately justify the need for such a policy'*, and due to the lack of information, it is impossible to *'assess their likely impact on the town, district or local centres'*.²
- 3.4 The evidence provided at **Appendix B** confirms that 70% of purchases by students in the school fringe are purchased in non A5 shops.³
- 3.5 Research by Peter Dolton states that *"At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school."*⁴ This clarifies that a blanket restriction on opening hours is unjustified.
- 3.6 Similarly, research by Brighton & Hove concluded that *'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day'*.⁵
- 3.7 Only limited purchases of food are made at A5 uses on journeys to and from school. Further details are set out in **Appendix D**.
- 3.8 Given the limited access that children have to fast food during the school day, a generic restriction is disproportionate; is not justified; and would not be effective. Such an approach would have a disproportionate effect on land use planning and the economy when taking into account the limited purchases made by school children who may only have the potential to visit A5 establishments at the end of the school day, and only during term time.
- 3.9 There is a lack of evidence to demonstrate whether fast food is located by schools, or whether schools are located by town centres

¹ J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. *A systematic review of the influence of the retail food environment around schools on obesity-related outcomes*.

² Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate

³ The School Fringe: *What Pupils Buy and Eat From Shops Surrounding Secondary Schools*, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University

⁴ Peter Dolton, Royal Holloway College, University of London & Centre for Economic Performance, London School of Economics, *Childhood Obesity in the UK: Is Fast Food a Factor?*
http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt

⁵ Brighton & Hove City Council & NHS Sussex, *Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove*, page 30, September 2011

- 3.10 When McDonald's looks at the economic viability of a new site, it does not factor in predicted sales from school children or proximity to schools.
- 3.11 Research by Christoph Buck has identified a similar approach with other retailers. His research suggests that *'food retailers are mainly located near major roads and in inner cities.'*⁶
- 3.12 Indeed, *'food retailers are not clustered around schools for up to 1.5 km'*⁷ Correlations between schools and fast food density are therefore due to the proximity of both to town centres, where there is a broad mix of retail on offer.
- 3.13 With a policy restricting location in place, all A5 development would likely be directed away from major, district and local centres – contrary to the sequential test.
- 3.14 We consider that restricting the proximity of hot food takeaways to local schools would be unsound and fails to meet the four tests of the Framework. It is not a positively approach to planning; justified; effective; or consistent with national planning policy. Such a policy should therefore not be taken forward to the next stage of the plan making process.
- 4. Response to Question RTC16 – The council considers such specific uses to include 'high energy density food' outlets, which sell foods high in fat and/or sugar; betting shops; gaming centres; and premises selling alcohol, particularly for off licence sales. Do you agree with this definition? Do you think that the list should be amended?**
- 4.1 No consideration has been given to other A class uses and their contribution or impact on daily diet or wellbeing. The suggested approach is therefore not holistic and will not achieve the principle aim.
- 4.2 There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A Class premises. Evidence confirming this is set out in **Appendix C.**
- 4.3 Many restaurant operators have made major steps to expand the range of healthy options and work with the communities within which they are / will be part of.
- 4.4 McDonald's has made major steps in recent years to expand the range of healthy offerings
- 4.5 As a responsible business, McDonald's recognises it has a role to play to support its staff, customers, and the communities in which it operates to live healthier lifestyles. For this reason, McDonald's has invested significantly to evolve its menu over the last 10 years – both to extend the range of choice, and to reformulate our products. For example, McDonald's has:
- Added porridge, salads, grilled chicken wraps, carrot sticks, fruit bags, orange juice, mineral water, and organic milk to its menu
 - Completely removed hydrogenated trans-fats from its menu
 - Reduced salt in our Chicken McNuggets by 36%, and our fries by a quarter since 2003
 - Reduced fat in its milkshakes by 34% per serving since 2010
 - Reduced fat in its deli rolls by 42% since 2011

⁶ Buck et al. International Journal of Behavioural Nutrition & Physical Activity, Page 7, 2013 - <http://www.ijbnpa.org/content/pdf/1479-5868-10-65.pdf>

⁷ Christoph Buck et al. Clustering of unhealthy food around German schools and its influence on dietary behaviour in school children: a pilot study, page 6, 2013

- 4.6 McDonald's has also led the way displaying nutritional information to help its customers make informed choices. Since 2011, McDonald's has provided calorie information on every one of its 1,200+ menu boards in restaurants across the UK.
- 4.7 This is in addition to the nutritional information that is already available on its website, on its tray liners, on its packaging, and via McDonald's mobile phone app. In 2012 alone, McDonald's received 2.2 million visits to its nutrition web page.
- 4.8 Furthermore, McDonald's is committed to responsible advertising, and advertise to children only food items that are not classified by the Government's nutrient scoring criteria as High in Fat, Salt or Sugar "non-HFSS". All of McDonald's advertising to children features at least one portion of fruit or vegetables, and a no added sugar beverage such as milk.
- 4.9 As a significant customer of British farming, McDonald's buys quality ingredients from 17,500 UK and Irish farmers. It now spends more than £390 million every year on British and Irish produce, compared to £269 million in 2009.
- 4.10 All of McDonald's burgers are made with 100% British and Irish beef. We use whole cuts of forequarter and flank, with nothing added or taken away in the process.
- 4.11 In addition, McDonald's only uses 100% British RSPCA Freedom Food Pork across its entire menu. As a result, all pork suppliers are required to meet strict animal welfare standards.
- 4.12 McDonald's was also one of the first retailers to switch to using free range eggs – which it did back in 1998. Free range eggs are now used in its entire menu – including its sauces, muffins and the coating on chicken nuggets. Every year McDonald's use over 100 million free range eggs, sourced from more than 200 UK producers, and for its work in this area they have been awarded 'Food Business of the Year' by the British Free Range Egg Producers Association.
- 4.13 The strength of McDonald's supply chain – which was clear of any horsemeat – has also been confirmed by Professor Chris Elliott, who said in light of the horsemeat scandal: *"McDonald's invited us to look at farms and abattoirs – it was a very simple supply chain. The other thing I was very impressed about was the length of contract McDonald's had with its suppliers."*⁸
- 4.14 McDonald's also contributes to the community
- 4.15 As the Community Partner of the Football Association, McDonald's has helped to train and recruit more than 25,000 coaches. These coaches in turn have provided more than 2 million hours of free quality coaching, to one million young players.
- 4.16 Over 1,000 McDonald's restaurants across the UK are 'twinned' with a local team to provide free kit, equipment, advice and expertise.
- 4.17 Each of McDonald's restaurants also conduct a minimum of three litter patrols on a daily basis, and conduct larger Love Where You Live 'clean up' events. McDonald's is also the primary sponsor of the Mayor of London's Capital Clean Up campaign, to tackle litter across London.
- 4.18 Last year, McDonald's restaurants in Greater London organised over 50 community clean-up events, with over 1,400 volunteers taking part.
- 4.19 McDonald's is a major employer of young people

⁸ Evidence at Environment, Food & Rural Affairs Select Committee Inquiry, January 2014

4.20 McDonald's is a major employer of young people under the age of 25, and for many it provides a first step on the career ladder. McDonald's offers all staff the opportunity to gain qualifications which include Adult Certificates in English and Maths, a Level 2 Apprenticeship, and a Foundation Degree in Managing Business Operations.

4.21 McDonald's invest £43 million annually in staff training and development.

5. Response to Question RTC19 - Do you think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis?

5.1 It has been highlighted above that there is no appropriate reason to restrict the location A5 uses by their location, concentration or distances from local schools. It is unsound to introduce such a widespread land use policy to protect the amenity of such uses, which could be dealt with on a case by case basis via conditions. There is very little information provided in the supporting text to explain why the restrictions are required.

5.2 The proposed approach is in direct conflict with the Framework. The policy attempts to introduce a widespread land use restriction on a specific use class without providing a single map to outline the specific limitations it would have. Without a map it is impossible to indicate the extent of the policies implications on the borough. Although the Hot Food Takeaway Guidance Note does have a map illustrating the impact a 400m buffer around schools would have the data is from 2014 meaning that the concentration and locations of hot food takeaways is likely out of date, therefore a new map will be required for further evidence.

Appendix A – There is a lack of evidence to demonstrate the link between fast food, school proximity, and obesity.

1. This has been confirmed by Public Health England and the Local Government Association (November 2013). Their paper, *Healthy People, Healthy Places* states there is ‘an unavoidable lack of evidence that can demonstrate a causal link’ between fast food, school proximity and obesity.⁹
2. The same paper states there are only ‘theoretical arguments for the value of restricting the growth in fast food outlets’.
3. Oxford University’s Department of Population Health conducted ‘A systematic review of the influence of the retail food environment around schools on obesity-related outcomes’ (December 2013).¹⁰ This was funded by NHS Berkshire and the British Heart Foundation, and is a comprehensive analysis of the existing evidence base.
4. The research ‘did not find strong evidence at this time to justify policies related to regulating the food environments around schools’. It instead highlighted the need to develop a ‘higher quality evidence base’ which for instance:
 - Uses a consistent way to classify a food outlet, in order to compare results from different studies
 - Looks at the age range of children, and their interaction with the environment. Age can influence travel time, distance travelled, the availability of pocket change, and other factors
 - Understands the need to assess a child’s mode of travel to and from school in decisions about appropriate buffer distances
 - Recognises that food environments vary between countries – most associations between food environment and obesity came from North America
5. The review did find some limited evidence for an effect of the school environment on body weight, but it added ‘these results should be interpreted cautiously’. Of 72 associations, only 19 showed a statistically significant positive relationship between body weight and exposure to food outlets. The review also identified associations with convenience stores as well as fast food outlets.

⁹ Public Health England & LGA, *Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets*, page 5, November 2013

¹⁰ J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. *A systematic review of the influence of the retail food environment around schools on obesity-related outcomes*.

6. A number of studies have reached similar conclusions. These include, but are not limited to:
- David Harris – ‘no correlation between students’ being overweight risk and the presence of stores with unhealthful food choices near their schools.’¹¹
 - Philip Howard – Research ‘failed to find a consistent association between school overweight rates and nearby fast food restaurants’.¹² If anything, this research found ‘Convenience stores demonstrated stronger correlations with school overweight rates’.
 - An and Sturm – ‘no evidence to support the hypotheses that... less exposure to fast-food restaurants or convenience stores within walking distance improve diet quality or reduce BMI among Californian youth.’¹³
 - Fleischhacker – This systematic review of fast food access studies concluded 53% did not find any significant associations between the fast food environment and obesity. ‘In children, only one of five studies found an association between BMI and the fast food environment.’¹⁴
7. This lack of evidence has also been confirmed in a number of planning decisions.
- For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating ‘the evidence base does not adequately justify the need for such a policy’, and due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’.¹⁵
 - Further, in Newham the Planning Inspectorate called for ‘deletion of an exclusion zone for A5 use class within 400m of secondary schools’ as ‘the policy is not supported by the evidence at present’.¹⁶

¹¹ David Harris et al. Location of Food Stores Near Schools Does Not Predict the Weight Status of Maine High School Students, page 276, 2011 - http://ac.els-cdn.com/S1499404610004574/1-s2.0-S1499404610004574-main.pdf?_tid=720c269e-c3d7-11e3-874e-00000aabb0f01&acdnat=1397481765_c271ecb04c8e2d5970dbc420d656f128

¹² Philip Howard et al. Proximity of food retailers to schools and rates of ninth grade students: an ecological study in California, page 6, 2011

¹³ Ruopeng An, & Roland Sturm, School and Residential Neighborhood Food Environment and Dietary Intake among California Children and Adolescents, page 5, February 2012 - <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3298889/pdf/nihms358700.pdf>

¹⁴ S Fleischhacker et al. A systematic review of fast food access studies, page 8, 17th December 2009

¹⁵ Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate

¹⁶ Report to London Borough of Newham Council, 13th January 2012, Geoff Salter BA MRTPI, The Planning Inspectorate

Appendix B – Food in the school fringe tends to be purchased in non-A5 properties.

1. Research by Professor Jack Winkler (London Metropolitan University) into the 'school fringe' – found just 3/10 purchases by students in a 400m school fringe were made in A5 properties.¹⁷
2. 70% of purchases in the school fringe were made in non-fast food outlets, and the same research concluded *'the most popular shop near Urban was the supermarket, with more visits than all takeaways put together'*.
3. Professor Winkler's findings are not an isolated case. A report by Public Health England and the LGA states that fast food school proximity restrictions do *'not address sweets and other high-calorie food that children can buy in shops near schools.'*¹⁸
4. Research by Brighton and Hove found that *'Newsagents were the most popular premises [in the school fringe], with more pupils visiting newsagents than any A5 premises'*.¹⁹
5. Likewise, research for the Food Standards Agency on purchasing habits in Scotland found that *'Supermarkets were the place that children reported they most frequently bought food or drinks from at lunchtime'*.²⁰
6. Indeed, there are several more researchers who have found no evidence to support the hypothesis that less exposure to fast food, or better access to supermarkets are related to higher diet quality or lower BMI in children.^{21 22 23}

¹⁷ The School Fringe: *What Pupils Buy and Eat From Shops Surrounding Secondary Schools*, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University

¹⁸ Public Health England & LGA, *Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets*, page 5, November 2013

¹⁹ Brighton & Hove City Council & NHS Sussex, *Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove*, page 28, September 2011

²⁰ Jennie Macdiarmid et al. Food Standards Agency. Survey of Diet Among Children in Scotland (2010) - http://www.esds.ac.uk/doc/7200/mrdoc/pdf/7200_final_report_part_2.pdf

²¹ Forsyth, A., et al., *Do adolescents who live or go to school near fast-food restaurants eat more frequently from fast-food restaurants?* Health and Place,, 2012. 18(6): p. 1261-9.

²² An, R. and R. Sturm, *School and residential neighborhood food environment and diet among California youth*. American Journal of Preventative Medicine, 2012. 42(2): p. 129-35.

²³ Timperio, A.F., et al., *Children's takeaway and fast-food intakes: associations with the neighbourhood food environment*. Public Health Nutrition,, 2009. 12(10): p. 1960-4.

Appendix C – There is a lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A class premises.

1. A key finding of Brighton & Hove's research was that *'newsagents and supermarkets [are] equally as influential on the unhealthy choices of pupils.'*²⁴
2. Hot food take-aways are identified as a particular concern, but there is a lack of evidence to inform why A5 units have been identified as a concern over other units, namely A1 and A3 units.
3. Research by the Children's Food Trust for instance found that *'Once outside school... students faced an environment designed to encourage less healthy food purchasing, mostly from corner shops and supermarkets near to school, outlets which successfully promoted less healthy foods to this population.'*²⁵
4. The report added *'this study observed no visits to takeaway outlets'* – although it did qualify this saying a *'larger, more representative study'* was required to determine whether proposals to restrict A5 outlets are effective in promoting healthier eating habits in teenagers.
5. Similarly, research elsewhere found *'traditional fast food outlets offered a greater variety of healthier breakfast entrees, healthier lunch/dinner entrees, and healthier lunch/dinner side dishes'* than convenience stores, grocery stores, and supermarkets.²⁶
6. We therefore assert that sole inclusion of A5 premises is irrational, will not be effective, and is therefore not justified.

²⁴ Brighton & Hove City Council & NHS Sussex, *Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove*, page 28, September 2011

²⁵ Children's Food Trust, Page 9, November 2011 - http://www.childrensfoodtrust.org.uk/assets/research-reports/journey_to_school_final_findings.pdf

²⁶ Jennifer S Creel et al. Availability of healthier options in traditional and non-traditional rural fast-food outlets, page 4, 28 November 2008 - <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2614433/pdf/1471-2458-8-395.pdf>

Appendix D – Only a limited number of journeys to and from school involve a purchase at a food outlet.

1. This has been confirmed in research by the Children's Food Trust, which found that only 8% of all journeys to and from school included a purchasing visit to a food outlet.²⁷

Table 3. Total number of journeys including a food outlet visit				
	<i>n</i>	Number of journeys to school	Number of journeys from school	Total number of journeys
Journeys including a visit to a food outlet		86	87	173
Journeys including a purchase from a food outlet		11	6	17
		8	6	14
				Percentage (%) of all journeys

2. Of the food purchases made on school journeys, confectionary was the most popular item sold – which McDonald's does not offer on its menu.
3. Likewise, research by Ashelsha Datar concluded that children *'may not purchase significant amounts of junk food in school'* – partly due to *'fewer discretionary resources to purchase them'*.²⁸
4. Indeed, even where purchases were made, *'children may not change their overall consumption of junk food because junk food purchased in school simply substitutes for junk food brought from home.'*
5. Similarly, research by Fleischhacker highlighted the need for future school-based studies to *'gather information on whether or not the students attending the studied schools actually eat at the restaurants near their schools.'*²⁹
6. This was also highlighted in the systematic review by Oxford University, which states *'future work should also incorporate a child's usual mode of travel to and from school into decisions about appropriate buffer distances.'* The review added that age should also be taken into consideration, as this can impact on travel time and the availability of pocket change.³⁰

²⁷ Children's Food Trust – November 2011, page 1 http://www.childrensfoodtrust.org.uk/assets/research-reports/journey_to_school_final_findings.pdf

²⁸ Ashelsha Datar & Nancy Nicosia, Junk Food in Schools and Childhood Obesity, page 12, May 2013

²⁹ S Fleischhacker et al. A systematic review of fast food access studies, page 9, 17th December 2009

³⁰ J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13-14, 11th December 2013. *A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.*

maryott, kyle

From: [REDACTED]
Sent: 11 May 2018 19:25
To: futuremedway
Cc: [REDACTED]
Subject: High Halstow Development

Categories: Blue Category

I would like to state my objection to the development of High Halstow village outlined in the development strategy.

I do not understand how an area that has been assessed in January 2017 as unsuitable for development can be identified as a potential site without a further update to the land availability assessment and consultation (see attached). In addition to this it appears the proposed area is more than twice the size of the village, this will have a huge negative impact on local infrastructure including policing, healthcare, shops, roads and schools.

The High Halstow area has been included in all four of the scenarios as well as the golf course (contrary to prior public notifications) and I feel that our voices are not being heard and would like to understand if we as council tax paying members of the public are truly able to have an opinion and influence this planning drive or if Medway council are simply paying lip service to our constant objections to development requests.

Kind regards

Toby Pusey

Medway Strategic Land Availability Assessment (SLAA)
January 2017

Site Details				Achievability & Development Potential						Conclusion
Site Ref	Site Name	Site Area	Suitability	Availability	Development Potential	Phasing 0-5 yrs	Phasing 6-10 yrs	Phasing 11-15 yrs	Phasing 16 + yrs	Capacity
1086	Westmoor Farm, Moor Street, Rainham	0.40			Residential	*				6
1087	Land to the East of Berwick Way, Wainscott	39.00								
1088	Manor Farm, Parsonage Lane	19.06			Residential	*	*	*		375
1089	Land at Priestfield, Gillingham	2.24			Residential		*			78
1090	Abbots Court, Stoke Road, Hoo	0.23								
1092	3 Broad Street Cottages, Main Road, Hoo	0.39			Residential		*			8
1093	Between 102-112 Lower Rainham Road	0.292								
1095	Collingwood Triangle, Brompton Barracks	2.36			Residential		*			25
1096	Sports Field No 1, Inner Lines, Brompton Barracks	9.96								
1103	Cooling Road, High Halstow	0.41								
1104	North of St James Church Cooling	0.47								
1105	Manor Farm, Marsh Road, Halling	1.10			Residential			*		22
1106	Miles Place, Delce Road, Rochester	0.31			Residential		*			11
1108	Land at Lower Bloors Lane Rainham	0.88								
1110	Land at the Alps	3.40			Residential	*	*			119
1112	Samuels Towers, Longhill Avenue, Chatham	1.11			Residential		*			39
1113	Land to east of High Halstow	41.00								
1114	Chatham Driving Range	2.72			Residential	*				95



Dear Councillors,

I have just responded to the Medway Local Plan Consultation, calling for all development options that threaten to seriously damage Lodge Hill SSSI to be removed.

I am very proud to have the UK's best site for nightingales on my doorstep. we need to celebrate this wonderful place, not bury it under concrete or surround it with housing.

As a Medway resident I believe my point of view is important and should matter to the Council. Please give my consultation response the weight it deserves.

Kind regards,

Alan Millward

maryott, kyle

From: [REDACTED]
Sent: 16 May 2018 09:06
To: futuremedway
Subject: Further building works at High Halstow. Rochester

Categories: Blue Category

Dear Sirs,

I have read with interest the new local plan and appreciate that regeneration in certain areas is a priority for Medway but do not destroy our villages. We do not need the urban sprawl to penetrate our countryside.

We enjoy peace and tranquility in the village of High Halstow. We have the Heronry and the beautiful views of the countryside running down to the river. Our roads are becoming more congested and with the new town being built at Hoo, it will be more difficult than ever to get to the peninsula. The roundabout at the bottom of Four Elms Hill is always heavily congested and we already have the very heavy lorries travelling to the Container Port at Grain.

I strongly oppose any future development to our beautiful villages in this area.

Yours sincerely,

Mary Jones

Sent from my iPad

Dear Sir/Madam,

Background.

Since adopting its Local Plan (2003) Medway has attempted, unsuccessfully, three times to produce a Core Strategy/Local Plan. This is now Medway's third reg 18 consultation on this Local Plan. It is 2 years behind its November 2015 LDS and is now stuck at Reg 18 stage for a 3rd time.

Medway Councils failure to produce two core strategies is clear evidence of a significant problem with its plan making function. Its inability to allocate an SSSI (Lodge Hill) for development has left it no better off then pre-2011. It is against this backdrop of disappointing progress that this repetitive and wasteful consultation has taken place.

The Council's Housing land supply is almost 50% behind its 5 year supply target¹. Local residents and businesses report how Medway's economic performance continues to decline by a lack of an up to date economic strategy that could be delivered if they had an adopted Local Plan. Medway is relying on ad hoc, speculative development which lacks co-ordination that does not make the most of their areas potential.

Previous Reg 18 (2016 and 2017)

Without contingencies, the withdrawal of the Planning application at Lodge Hill has made all the previous options (Reg 2017) meet less than OAN. These are not options for development and Medway have to re-start Reg 18 again.

Natural England's letter dated 18th April 2017 confirms they are opposed to development within the SSSI at Lodge Hill and concerned with Medway's SA that has been used to support such a development. They state how such a development would be contrary to the sustainability principles contained in the NPPF and also fails to see how Medway have identified alternatives to Lodge Hill as suggested in a recent Inspectors report.

Comments from Natural England, Kent Wildlife Trust, RSPB, past Planning Inspectors, significant numbers of Medway residents, adjoining local authorities, two unsound core strategies and the allocation of an SSSI would have probably made any other Council give Lodge Hill up.

At Reg 18 (2017) additional work on infrastructure planning, viability testing, environmental and economic considerations and growth delivery was to be commissioned (I&O2 para 34). This has not been done and there is significant work Medway needs to do if it is to generate credible options for growth.

Reg 18 (2018) Objectively Assessed Need

Medway state that it's OAN for housing using the governments 'standard method' is 37,143 over the plan period. Medway understands that this housing need figure applies now. Medway's 2015 North Kent SHENA uses a Housing figure of (29,463) and is now out of date.

Scenarios.

Scenario 1 and 2 use the SHENA (2015) 29,463 out of date housing figure and neither meet OAN. They are not suitable options for development.

¹ Medway Authority Monitoring Report 2017 Net additional dwellings in previous years pp29

Scenario 3 aims to meet the Government's Standard method for calculating housing need as 37,143 over the plan period. However it fails to meet it by 1,182 and is not an option for development. There appears to be valuable land in the SLAA that may not have been included. Medway are probably ruling out usable sites and the SLAA may need to be reviewed. These and other issues are confirmed by a number of other respondents. However, Medway may not be serious about meeting this uplift figure. As mentioned in a recent Kent online² article. Medway's cabinet members were vocal with their criticism of the Government's uplift figure. A Council leader describing it as, 'something from Monty Python'.

Nevertheless, why were the public told Medway needed Lodge Hill when its OAN was only 29,463? It has now found housing land that exceeds this figure without Lodge Hill. Where have all these sites come from?

With its significant negative impacts on the SSSI why Scenario 4 has been put forward is unclear. Medway recognises the highest level of protection, given to land designated a SSSI. Paragraph 152 of the Framework³ advises that significant adverse impacts on any of the dimensions of sustainable development should be avoided by, wherever possible, pursuing alternative options. Medway understands the NPPF avoid, mitigate compensate principles. Yet it never makes a case how the benefits of development at Lodge Hill outweigh the impacts on the SSSI. Nor does the Council seek to argue that identified needs cannot be met elsewhere in the District.

We are told that Homes England is working with Natural England in compiling its evidence base and assessing its approach to Lodge Hill. The outcome of this, given Natural England's previous and recent comments, is awaited. We are also told that Homes England is preparing a new Planning application for Lodge Hill.

However, Medway appears to be proposing land swap where SSSI land at Lodge Hill could replace the need to release land at Lower Stoke and south of Shawstead Road in the Capstone Valley. Using principles in the NPPF maybe it should be the other way around? The documents then states that Housing at Lodge Hill (Scenario 4) would then be added to the land supply in Scenario 1. But this still does not meet OAN and is not an option for development.

I doubt the positive assessment of Scenario 4 in the SA is merited and the recommendations of the other Scenarios lack credibility. For example Scenario 3 is the least positively scored yet it is the one that comes closest to meeting the Government's Standard method for OAN for housing.

In summary none of the 4 Scenarios meet OAN. It is hard to understand why they have been put forward for public consultation. Together with a lack of important evidence from this and previous consultations, a SA that lacks credibility, it questions the validity of the options generation process.

If Medway pursues these scenarios to examination it may not be justified under para 182 of the NPPF. **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. So far under Reg 18 Medway may not have consulted the public on any reasonable alternative strategies.

² <http://www.kentonline.co.uk/medway/news/monty-python-jibe-at-housing-targets-181230/>

³ NPPF

At some point Medway may have to consult the public: 1) using enough housing land to meet its OAN or say why it can't. And; 2) explain why it needs to build on an SSSI or omit it.

Local Plan Intervention

With the above in mind the Governments recent Local Plan Interventions may become a priority where:

- the least progress in plan-making has been made
- policies in plans had not been kept up to date
- there was higher housing pressure; and
- intervention would have the greatest impact in accelerating Local Plan production

Medway Council have made no progress in plan making since adoption of its 2003 Local Plan. In the last 15 years it has been found unsound twice with 2 core strategies and is now 2 years behind in its Local Plan stalling twice at reg 18. Maybe a third. Even worse Medway's Local Plan 2003 contains out of date policies and saved policies dating from 1993. None of which are compliant with the NPPF.

Medway Councils Housing land supply is almost 50% behind its 5 year target⁴. Additionally, there is high housing pressure in Medway which has seen an uplift from 29,463 dwellings to 37,143 over the plan period. This is a significant increase. If the article in Kent online⁵ is to be believed Medway Councillors do not appear willing (at the moment) to accept this new housing target. Describing it as 'something from Monty Python...'

Its reported unwillingness to accept the uplift in housing need, may affect its co-operation to produce reasonable alternatives. If Medway continue producing its local plan is there a high probability it could, a) be found unsound at examination? and b) a fourth reg 18 consultation may result in further delays to the programme and further uncertainty over the requirements of the evidence base.

If so, the case for starting the intervention process is compelling and could be the best way forward. If reasonable help failed, may be neighbouring authorities could be invited to produce Medway's Local Plan, with support from PAS a significantly shorter program with evidential studies could be commissioned to support it.

Yours sincerely

Dr Morgan Slade BA (Hons), PgDip (Law)., PhD., MRTPI., MinstLM

⁴ Medway Authority Monitoring Report 2017 Net additional dwellings in previous years pp29

⁵ <http://www.kentonline.co.uk/medway/news/monty-python-jibe-at-housing-targets-181230/>

maryott, kyle

From: [REDACTED]
Sent: 17 May 2018 15:35
To: futuremedway
Subject: land development at High Halstow and the peninsula

Categories: Blue Category

Dear Sirs,

I am strongly opposed to further development on the peninsula in Medway.

I live in High Halstow. I travel into Strood and often use the wainscott bypass. The traffic at the four elms hill roundabout is treacherous. The queues extend often back to the Cliffe turning towards the roundabout and almost to the garages going down four elms hill in the morning. Juggernauts queue to enter the service stations on either Side of the hill and there have been several accidents both at this point and the roundabout at the bottom. I have seen numerous lorries on their sides at the smaller roundabouts on the ratcliffe highway and feel more development will only add to the congestion and danger. The lanes around the villages will not cope. When there is a problem at the bottom of four elms hill for example, the peninsula can be cut off and the only way through is Cooling or the back roads through Upnor and the army camp. Is it that the plan is to widen the hill or create an additional road at the back of Hoo.

We have a fantastic parish council who do an admirable job for our village. However, they can only do so much. Already the roadside Kerbs need weeding and the verges need cutting badly.

We have one primary school in my village and I know there are others on the peninsula. However, High Halstow school has little room for development around it to take further children into the school. I know from experience that builders are supposed to donate an amount of money to schools to facilitate an increase in pupil numbers but often the school does not receive as much as was initially stated. School budgets are tight and further children will put extra pressures on school staff.

With extra housing will there be further amenities, for example bus services, Doctors, dentists, libraries and sport facilities?

A while ago, housing development suggestions were put on hold, because of the Nightingales. Have the Nightingales now moved on? Or have Medway Council decided that they are not protected anymore. It would be a shame if High Halstow lost its Herons!

I realise we have to do something to house the growing population of this country but please do not spoil an area which cannot physically take greater urbanisation.

Sincerely,

S Jones.

Sent from my iPa

maryott, kyle

From: [REDACTED]
Sent: 02 April 2018 11:34
To: futuremedway
Subject: Chatham town centre renovations.

Categories: Blue Category

Having read through my latest issue of Medway Matters the plans look to be a great improvement. While walking into Chatham from my house in the Chase I read the message on one of the new paving slabs. It asked, "What makes a town?" The answer was the people and the shops, I can't remember the third one.

The shops in Chatham are terrible. The only reason I shop there is because I shop at Sainsbuty's and it's easy to get a cab with my weeks shopping as we don't run a car.

While I'm in favour or making it more pleasant to walk from the station to the town centre it would be a good idea if visitors had something worthwhile to see when they got there.

Yours Sincerely, Eileen Coleman.(Mrs.)

From: [REDACTED]
Sent: 23 May 2018 12:17
To: futuremedway
Subject: Future Medway Local Plan

Categories: Blue Category

My comments concern primarily Upnor and the Hoo Peninsula.

It would appear that it is intended to greatly increase residential accommodation on the Peninsula. It is not clear, however, that there is any commitment to provide adequate infrastructure (roads and transport, health, schools etc) to support this development, nor that measures will be taken to address traffic volumes and indeed air pollution which already exceeds recommended levels on the current single access road.

Other options - for example redevelopment of Chatham town centre for residential accommodation - would appear more appropriate. Placing housing closer to work and commercial outlets would help minimise the need to travel, and thus traffic and pollution problems, while being convenient for residents.

Equally, measures to ensure that existing housing is not left unoccupied for long periods should be stepped up. At present, there is inadequate financial motivation to ensure that owners of unoccupied property either sell it or find tenants.

Moreover, I am concerned that insufficient consideration is being given to avoiding development on or next to nationally protected wildlife sites such as Lodge Hill. Indeed, there seem to be reasons to suspect that measures are being taken to undermine the significance of these sites, which measures would be inexcusable.

Since moving to Lower Upnor in 2002, I have been struck by the increased pressure of traffic and feeling of general over-crowding in the Medway area, leading to a significant loss of quality of life. As merely a small example, queues for the Four Elms roundabout are placing a strain on road users. As for the Upnors themselves, leaving the villages at certain times of day has become difficult even for confident drivers, as heavy traffic on Four Elms Hill and Berwick Way prevents safe merging from the access roads. How it must be for the many older and less-confident drivers in the villages, I can only guess.

Medway Council should feed back to the UK government in the strongest possible terms that north Kent is now full to the point of overcrowding, and that an overall, national population policy is urgently required.

Yours faithfully

Anthony Hunt
[REDACTED]



National Farmers' Union
Unit 8 Ground Floor
Rotherbrook Court
Bedford Road
Petersfield
Hampshire
GU32 3QG

Telephone: [REDACTED]

Medway Council
Gun Wharf, Dock Road
Chatham, Kent
ME4 4TR

Your ref:
Our ref: TO 2018 18

Email: [REDACTED]

Direct line: [REDACTED]

Date: 17 May 2018

By email only: futuremedway@medway.gov.uk

Future Medway Local Plan 2012 to 2035

The National Farmers Union is an industry representative organisation that aims to safeguard the business interests of farmers and growers and promote conditions for the industry to secure a competitive foothold in the UK and international economy.

Thank you for requesting our comment in relation to this latest Medway Local Plan consultation.

Question H1: Does the proposed policy for housing delivery represent a sound approach?

We are concerned there are no policies that explicitly enable the construction of rural workers dwellings at or near their place of work in the countryside.

As you are aware the National Planning Policy Framework includes provision for rural workers dwellings through Paragraph 55. This wording is likely to be updated as a result of the recent Housing, Communities and Local Government Consultation, where the following replacement is suggested:

"Planning policies and decisions should avoid the development of isolated homes in the countryside unless... there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside".

Without including provision to reflect the national framework, the Local Plan may be found unsound and open to challenge during the inspection. A rural workers dwelling policy must be included within the next draft of the Plan.

Question H9: Do you agree with the proposed policy for mobile home parks?

We agree that the council should set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites. These criteria must include provision to enable the construction of new mobile home parks to accommodate seasonal agricultural labour to harvest fruit and undertake other essential activities on farms.

It would not be appropriate for mobile homes on farms to be given exactly the same consideration as permanent residential dwellings because their use would only be for part of the year to accommodate seasonal farm labour. In this context it may be relevant to specifically exclude mobile homes on farms from the requirements of Policy H6, but enable their construction under Policy E2 Rural Economy.

Question E6: Do you agree with the proposed policy approach for the rural economy?

We support your general approach to Policy E2 as the scope appears to be sufficiently flexible to encompass most farming developments.

We do however query the wording that proposals must “demonstrate positive benefits” without any qualification as to what those benefits might be. We’re concerned this wording could potentially lead to a situation where public opinion drives the applicant to demonstrate positive benefits towards all manner of receptors that might not necessarily be relevant to the proposal itself. For example this wording may lead to a situation where an applicant is required to demonstrate positive benefits towards highways movements, local economic activity or any manner of other possible considerations, because the policy does not specify a relevant scope for the positive benefits referred to.

As such the notion of “positive benefit” may simply be too open ended and as an alternative it may be relevant to consider replacing this term with something that relates to “sustainable development” as defined in terms of the economic, social and environmental effects of the proposal?

In conclusion we hope that the three key areas identified above can be refined in advance of the next stage of Plan preparation and hope that our comments can be taken into consideration as you draft this. We would be very happy to meet with you to discuss how these areas of policy can be further developed.

Yours sincerely



Tom Ormesher
Environment and Land Use Adviser
National Farmers Union South East

maryott, kyle

From: [REDACTED]
Sent: 30 May 2018 23:39
To: futuremedway
Categories: Blue Category

The present infrastructure within the Rainham area is incapable of sustaining its present population. This is particularly prevalent in respect of schools, doctors, road systems not to mention the rail system into and out of London. The trains are unable to manage their present passenger numbers.

Whilst I realise the need of more housing but we must have the infrastructure else it will not be a pleasant place to live and bring up the family.

We live in the shadow of the busiest motorways in the country and when the new river crossing from Essex comes into being the traffic will increase putting more pollution into our lungs

This is just a sample of my concern.

Yours. e.r.lightfoot

From: [REDACTED]
Sent: 31 May 2018 18:21
To: futuremedway
Subject: Wallace Land Investments Representation to Future Medway Local Plan 2012 to 2035

Categories: Blue Category

Dear Medway Council

This is a representation to the Future Medway Local Plan 2012 to 2035 and specifically to provide support to housing proposal site **1174 – Stoke Road, Hoo** by Wallace Land Investments (Wallace).

Wallace support **Development Strategy Scenario 3: Meeting Government's proposed calculation of Local Housing Need**. This strategy best responds to the definition of local housing need by the government's proposed standard method and reflects the direction of travel for the revised NPPF.

To deliver this level of positive growth for Medway, development must be focussed on sustainable and marketable settlements. Wallace supports the identified growth of the **Hoo Peninsula Rural Town**.

Wallace controls the land known as **site 1174 at Stoke Road, Hoo** and we support the identification of this site in the development strategy scenarios for housing.

Given the identified 5 year effective housing land supply shortfall in Medway, Wallace submitted an **Outline planning application (Ref: MC/17/4424)** to aid Medway Council in the early delivery of positive growth in Hoo, proposing up to 200 residential dwellings (including 25% affordable housing), open space, drainage, access and associated works, with all matters reserved except for access. This application, following consultation with the local community and the Council, was minded to grant at committee on the 11th of April 2018 subject to the signing of a S.106 agreement. The completion of this is expected in early course.

The site at 1174 at Stoke Road, Hoo is therefore supported in principle by the Council and its members through its minded to grant planning status, and it should follow that whichever growth strategy is adopted for Medway, that the **site (Ref:1174) should be allocated for housing in the Future Medway Local Plan 2012 to 2035 with a capacity of 200 units to enable early delivery of sustainable growth for Medway**.

For any further information please contact me on the details below.

Alex Forsyth
Senior Strategic Land Manager

unearth the hidden value

Telephone



Address

2 Coates Crescent,
Edinburgh, EH3 7AL

Online

[REDACTED]
www.wallaceland.co.uk



From: [REDACTED]
Sent: 06 June 2018 20:52
To: futuremedway
Subject: Local plan and Lodge Hill SSSI

Categories: Blue Category

Dear Planning Policy Team

I grew up in Medway, I consider myself a "child of Medway". My late mother was a former chair of the Medway local RSPB group.

My father the late Owen Sweeney was a passionate and dedicated campaigner for the environmental provision in Medway. Not only as chair of the Medway Countryside forum, but as a hard worker in opposing Hoo peninsular Airport and of course spending countless dark hours surveying the nightingales at Lodge Hill. For his final year undergoing cancer therapy he spent many hours listening to me reading emails and drafting his replies regarding the Lodge Hill proposals and many other local campaigns - such as BWAG fighting for compensation from the National Grid when they carved a swathe through valued habitat during breeding season in Bredhurst.

Yes, he opposed Medway Council strongly on the issue of Lodge Hill but as anyone who met him will tell you he always did so respectfully and with his large intellect and a smattering of his quick Scottish wit. Yes, he was a Scotsman but he adopted Medway as his home in 1971 and never moved from his house in Rainham. He was someone who spent so many years tirelessly working not only as a public servant in government & for his parish church in Rainham but also most of his other waking hours campaigning, surveying, recording, meeting, advising, advocating - and yes, sometimes opposing - for the natural world around us ought. Such a person surely ought to be listened to with the utmost gravity for the experience they can provide, and their opinions treated with the seriousness they deserve?

As a Scotsman with a deep-set principle of contributing to the good of the community, he enjoyed the flora and fauna themselves but his motivation was far more importantly for provision for the residents of Medway. As he pointed out, _even if_ (and it's a massively unproven "if", in fact the evidence points the other way) the "compensation land" mitigation favoured by Medway in Essex or even further afield were to be "successful", what it would mean would be the LOSS of nightingales or similarly moved species from the residents of Medway, to the betterment of other areas. Medway has plenty of things to be proud of, but surely lead among those is the most important breeding site in the country for a red-listed bird which has such an important part in our folklore and national identity throughout the ages. We should be justly celebrating this.

But Medway is short of housing too. So what to do? Well whilst Medway has been trying fruitlessly for permission to develop Lodge Hill, meanwhile Ward & Partners and other land bankers in Kent have square miles upon square miles of land approved for housing, including plenty in Medway. They should make good on those applications before moving onto the more lucrative green fields - let alone destroying what has been approved and repeatedly defended as a genuine national SSSI. Let's remember what that stands for. It's land that independent experts have confirmed is a _Site_ of _Special_ _Scientific_ _Interest_. Not just for nightingales, but multiple different diverse and precious species and habitats. Let's celebrate that in Medway not destroy it.

I know this has dragged on for years and is something Medway Council will not want to be seen to lose. Both as a corporate entity but also with some individuals feeling that their personal reputation, pride or legacy is at stake - in their opinion. I guess they are probably "sick of hearing about nightingales". But put that aside for a minute. Take the time to listen to a Nightingale's song. We played it as the final "hymn" at Owen's funeral and it was the singularly most moving thing I've heard. Obviously it was a significant occasion in my life but everyone who heard it was an agreement. Take a moment now to find Nightingale song on google and just ... listen.

Proposals for Lodge Hill have been knocked back so many times for so many reasons relating to both the unsuitability of the site due to its designations, the quality of the various applications themselves, the poor nature of reports purporting to show there is no other option, and the processes leading to the flawed Local Plan(s) of the past. But isn't it time to take the mature approach of realising that multiple inspectors have found this not to be a suitable path to follow. Commercial organisations have also left it where they would surely have stayed on if it were in any way viable.

The SSSI designation in itself should be sufficient reason to avoid Lodge Hill, but the NPPF also makes clear that biodiversity must not only be protected but enhanced. That space is at a premium in Medway is not in question, but to destroy a shining example (Owen called this land a "jewel" of Medway) of an existing rich plot of Biodiversity? This would be irresponsible environmental vandalism diametrically opposed to the obligations of the NPPF on which the Local Plan must be based.

I would also like to echo the statements and sentiments of the RSPB:

- I care about the nation's best sites for wildlife, and I care about Lodge Hill and its nightingales.
- I am writing to remind you that Medway Council has a duty to avoid damaging our nationally important wildlife sites.
- Thousands of people have already repeatedly spoken out to protect Lodge Hill from development. Despite all of those voices, the new draft Medway Local Plan continues to promote development options that all threaten to seriously damage Lodge Hill Site of Special Scientific Interest (SSSI) and the nation's most important population of nightingales.

Please. Please. Remove any development within the Lodge Hill SSSI from your Local Plan, and ensure there is a significant and sufficient protective buffer between the SSSI and any new housing around it.

Kind regards,

Paul Sweeney
proud son of Linda and Owen Sweeney

Paul Sweeney

[REDACTED]

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 06 June 2018 20:32
To: futuremedway
Subject: Transport for future growth

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

Hello there I believe a new crossing from Rochester to Strood is needed to deal with the influx of traffic due to population growth. It's struggling now let alone 10years time a bridge at the bottom of shorts way to the roundabout at the leisure park digger land would be ideal to cut out the town centre of Strood for people that need to get to the m2 or cuxton areas. Allowing a cut through along the road from the bottom of the Rochester bridge into the medway business estate would ease congestion. Then people would be much happier to visit Strood and Rochester town centres and not be overwhelmed with traffic.

Kind regards
Daniel jones

Ms Catherine Smith

Planning Policy

Regeneration, Culture, Environment & Transformation

Medway Council

Gun Wharf

Dock Road

Chatham

ME4 4TR

By email to futuremedway@medway.gov.uk

14th June 2018

Dear Catherine

Medway Local Plan: Development Strategy Options

Thank you for consulting Maidstone Borough Council on the above document. This response has been considered and agreed by this council's Strategic Planning, Sustainability & Transportation Committee at its meeting on 12th June.

This council acknowledges and welcomes Medway Council's active consideration of how it could meet development needs within its own boundaries, including assessing how the increased housing requirement which would result from the Government's proposed standardised methodology could potentially be accommodated within Medway (scenario 3).

Transport


It is noted that the strategic transport modelling completed so far to support the emerging Local Plan has not yet been published. The consultation document indicates that the modelling to date has been in the form of a 'do nothing' approach to identify which junctions would reach/exceed capacity by the end of the Plan period. It is also understood that this first phase of modelling includes background growth generated from neighbouring authority areas but does not, as yet, incorporate the specific pattern and volume of additional traffic generated by planned development in those other areas, including that consented and forthcoming from the Maidstone Borough Local Plan. Furthermore, the 'do something' options, i.e. mitigation measures and intervention such as junction improvements, public

Maidstone Borough Council

Maidstone House,
King Street,
Maidstone, Kent ME15 6JQ

 maidstone.gov.uk

 [maidstonebc](https://twitter.com/maidstonebc)

 [maidstoneboroughcouncil](https://www.facebook.com/maidstoneboroughcouncil)

transport measures and, potentially, a Park & Ride site which would support the development scenarios are all yet to be tested. This will be done to inform the selection of Medway's preferred development option in advance of the next round of consultation on the draft Medway Local Plan (Regulation 19 stage).

Maidstone Borough Council considers that this next phase of strategic transport modelling must specifically assess and identify the need for additional mitigation schemes for key junctions within Maidstone borough which could be impacted by the scale of growth proposed in Medway in combination with that already committed in Maidstone borough and elsewhere. MBC's previous consultation response to the Development Options document specifically highlighted that development around Rainham and Hempstead could have a significant impact on M20 Junction 7 and the southern end of the A249. Scenarios 1,3 & 4 in the current consultation document would each include new housing development in these locations. The M20 Junction 7 already suffers from traffic congestion at peak times and requires capacity improvements in order to accommodate growth planned in Maidstone borough to 2031.

More widely, development across Medway is likely to impact on the highway network at Bluebell Hill (A228), M20 Junction 6 and, potentially, at Boxley Road.

MBC undertook specific assessment of M20 Junctions 5-8 for the Local Plan Examination to identify the mitigation required to support this borough's growth. The report is available here:

[http://services.maidstone.gov.uk/docs/TRA%20037%20\(A\)%20M20%20Junction%20Assessments%20\(November%202016\).pdf](http://services.maidstone.gov.uk/docs/TRA%20037%20(A)%20M20%20Junction%20Assessments%20(November%202016).pdf)

It is vital that the potential impacts of Medway's proposed growth on the road network within Maidstone borough is properly assessed and addressed. MBC requests that the findings of the transport modelling pertinent to this borough are shared in a timely manner in advance of the next Regulation 19 consultation through on-going Duty to Co-operate engagement between the authorities. Transportation matters are likely to be a key cross boundary issue to be addressed in any forthcoming Statement of Common Ground between the two authorities.

Air Quality & Habitats Regulation Assessment

Linked to the issue of transport is the effect that the proposed growth in Medway could have on air quality and in particular on the two European nature conservation sites in Maidstone borough, namely the North Downs Woodlands Special Area of Conservation (SAC) and the Queensdown Warren SAC.

The consultation document confirms that strategic air quality modelling will be undertaken to inform Medway Council's selection of its preferred development option. As for transport, the potential linked effects on areas of poor air quality in Maidstone borough should also be part of this strategic assessment. Attached is a plan showing the Maidstone Air Quality Management Area (AQMA) which has been designated as a result of NO₂ levels linked to traffic emissions. The AQMA extends to the north of both M20 Junction 6 (A229) and Junction 7 (A249) illustrating that air quality in these locations, and further into the heart of Maidstone, could be worsened by Medway's growth unless it is a) adequately assessed and b) mitigation measures are instituted.

In respect of the assessment of impacts on the SACs, an interim Habitats Regulation Assessment Report (HRA) has been published in support of the current consultation.

Part of the North Downs Woodland SAC is located along the Wouldham – Detling escarpment. The designated SAC area is within 5m of the A249 at Detling Hill at its closest point in the east and within 160m of A229 at Blue Bell Hill in the west. The SACs are sensitive to deteriorating air quality (increases in Nitrogen Dioxide) resulting from increased traffic movements associated with development.

The interim HRA study has used the (unpublished) Medway Strategic Transport Assessment and air quality monitoring data. At this stage, Maidstone Borough Council notes that an initial finding of the study is that development has the potential to worsen air quality impacts on the woodland in the North Downs SAC. The report states that further assessment will be undertaken, drawing on the strategic air quality modelling, to more precisely determine the actual effects to inform the selection of the prepared option.

As for the transport modelling, Maidstone Borough Council considers that the air quality impacts of Medway's growth plans on Maidstone's AQMA should be assessed and the findings shared with Maidstone Borough Council prior to the Regulation 19 consultation on the Medway Local Plan. Any mitigation measures required in this borough should also be identified prior to the Plan moving to its next stage.

Employment sites

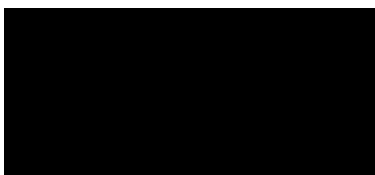
It is noted that the document signals a potential new office location close to M2 Junction 4 but provides little detail in terms of scale and exact location at this stage. Maidstone council would request to be updated as proposals for this allocation become more definitive so that the council can determine whether it could impact on this borough's existing and forthcoming employment sites.

Gypsy & Travellers

In response to specific question QH21, Maidstone Borough Council considers that Medway Council should make specific site allocations in its Local Plan to ensure that the future need for Gypsy and Traveller pitches can be met.

I look forward to our continuing active engagement on strategic matters affecting our two areas and collaboration to achieve an agreed Statement of Common Ground prior to the submission of the Medway Local Plan.

Yours sincerely,



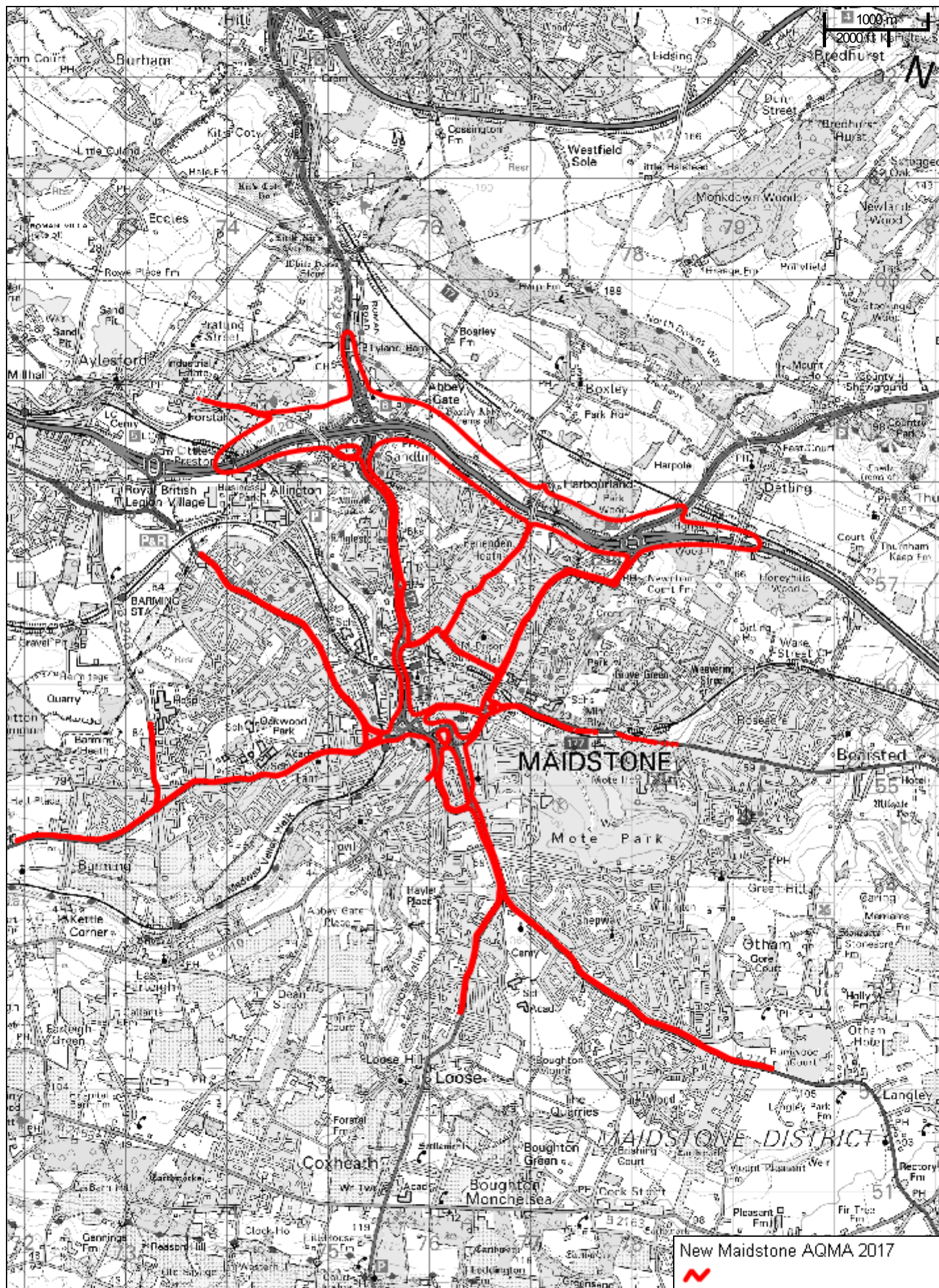
Mark Egerton

Strategic Planning Manager

Maidstone Borough Council, King Street, Maidstone, Kent ME15 6JQ

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w www.maidstone.gov.uk



New Maidstone AQMA 2017

14 June 2018

Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Dear Sirs,

**FUTURE MEDWAY LOCAL PLAN 2012 TO 2035
DEVELOPMENT STRATEGY DOCUMENT**

Introduction

On behalf of SSE Generation Development Ltd, we write in response to the Future Medway Local Plan Development Strategy which was published on 16th March for public consultation.

SSE Generation Development Ltd are a subsidiary of SSE plc which is one of the UK's leading energy companies, involved in the generation, transmission, distribution and supply of electricity, and in the extraction, storage, distribution and supply of gas. Its core purpose is to provide the energy people need in a reliable and sustainable way. SSE supplies energy to around 8.08 million energy customers throughout Great Britain and Ireland, and is the UK's leading generator from renewable sources.

SSE are the owner of Medway Power Station and have undertaken a comprehensive programme of upgrade works including upgrades to gas turbines, steam turbines, boilers and process control systems. The purpose of this is to increase the flexibility and efficiency of the plant.

Development Strategy

The new Local Plan will replace the 2003 Medway Local Plan and will provide direction on the future growth of the area. It is noted within the introduction that the aim of the Local Plan is to ensure that Medway grows sustainably, to provide land for homes, jobs, infrastructure and services that people need, whilst protecting and enhancing the qualities of the area's environment and heritage.

Pages 181 - 183 of the Development Strategy document considers Energy and Renewables. Paragraph 12.30 states that: *"Medway is of national significance for power generation, electricity and aviation fuel distribution and Liquefied Natural Gas (LNG) importation."*

Furthermore, paragraph 12.34 states that: *"the proximity of power stations to the proposed expansion of Hoo suggests there is potential for large scale district heating utilizing waste heat from power plants."*

SSE welcomes that the emerging Local Plan seeks to encourage future opportunities for new power generation and energy storage. There should also be support for conventional power station extensions, repowering and refurbishment.

Paragraph 12.38 advises in planning for renewable energy that Local Plans should take a positive approach by identifying suitable areas for renewable energy generation and its supporting infrastructure, and by maximizing the opportunities for community-led and decentralized energy production.

Policy MWE11: Energy and Renewables states:

"Proposals for energy developments, including any ancillary building or infrastructure, will be supported unless:

- the significant impact would compromise statutory designations where national planning policy restricts development;*
- their scale, form, design, material and cumulative impacts is unacceptable to the local landscape or built environment, or loss of the best and most versatile agricultural land;*
- any adverse significant impacts on the local community, economy, biodiversity or historic interests cannot be mitigated;*
- The council will consider the designation of defined areas for renewable energy technologies through a Local Landscape Character Assessment.*
- The council will actively promote the development of local supply chains and other associated employment opportunities.*
- The council will explore opportunities for Combined Heat and Power Systems connected to district heating networks."*

It is considered that the Council's policy should also be supportive of renewable energy including larger tip heights to reflect commercial viability. In addition, policy should consider applications for repowering, wind farm extensions and remove conditions from planning permissions that are time limited.

Conclusions

As noted above, SSE owns Medway Power Station and consider that Council policy should be reflective of commercial viability and support repowering. The review should also contain policy on wind energy, specifically noting support for larger tip heights and the removal of conditions that are time limited.

Should you wish to discuss any of the points raised in this consultation further, then please do not hesitate to contact me direct


ALAN FITZPATRICK

Email: 

Enc



Hoo Saint Werburgh Parish Council

Parish Clerk: Mrs Sherrie Babington

[REDACTED]

[REDACTED]

Telephone:

[REDACTED]

Email: hooparishcouncil@sherriebabington.co.uk

15th June 2018

Hoo St Werburgh Parish Council

Comments in respect Local Plan Consultation Document of Medway Council

The council's vision is to “achieve growth for all” to make Medway an excellent place to live, work, learn and visit, but it does not seem to take in consideration this statement for those living on the Peninsula.

The need for new homes, must not detract from the need of adequate planning process
There should be no shortcuts the need of proper public consultation should never be overlooked despite how attractive the site might look to developers and planner’s public opinion must be taken into consideration

It is our belief that before any developments as noted in all four scenarios should fit all three

Dimensions to become a sustainable development those being;

Economic - is the land used in the right place

Social - does it meet provision of accessibility to local services

Environmental - saving natural resources, minimising pollution,

And in all scenarios the harm to both the character and the appearance of the Peninsula cannot be underestimated.

We do not believe that a full sustainability plan has been made or published.

Some questions needing answering by the council.

All four local plan options include no development in Strood Rural Ward (Cliffe, Cliffe Woods, Wainscott, Frindsbury, Upnor). Why is this?

Why is all the weight of development being put onto the Peninsula and particularly Hoo St Werburgh?

Why is the allocation for development not proportionally, evenly, and fairly spread across all? communities in Medway?

The Peninsula with one major road on and off it, there is only so much transport capacity in order to avoid 'bottlenecking' the transport system on and off the Peninsula at peak times. So why do Medway continue to target it with “small rural town” projection without explanation of how is this to be achieved.

Any local plan was always going to include an increase in housing on the Peninsula however achieving it in a sustainable way without harming the Peninsula's natural environment will need very careful planning and will need to take in the hopes and needs of those living within the Peninsula already.

The need of a walk in medical centre/cottage hospital is paramount importance to accommodate any extra homes and would make it less challenging for residents to access Medway hospital and of course would relieve stress on an often-failing local hospital.

The phrase "affordable housing" is overused and needs much more information on how to define affordable, no mention of "suitable" housing, given the increase in older population, single storey buildings should be available close to medical and community facilities with good public transport links.

There is also a need for single occupancy homes with an ever-increasing number of people living alone and of course homes for local born and locally employed people on the Peninsula with a large element of starter homes.

And the need for nursing and care homes is all part of any local community.

And of course, the creation of open recreational areas not only for use of the young and families but from the older people too.

The Hoo Peninsula has had more than its fair share of developments over the last local plan period but understand that there will be new investment in our area and with that in mind we have some suggestions for your consideration

The feasibility of brand new settlements or villages rather than expanding or merging existing settlements which will change the character and 'village status' of those existing villages. For example, a brand-new village could be built between Hoo St Werburgh and Stoke (call it 'Kingsnorth') with visible and clear green field buffers both sides of such a new settlement - this would respect the village status of both Hoo St Werburgh and Stoke the opportunity for river frontage properties would also be a great advantage.

Small number of extra homes could be built within High Halstow, Grain and Allhallows and Frindsbury and more at Upnor and at Cliffe and Cliffe woods to ease the pressure of numbers on Hoo St Werburgh.

To take advantage of all empty property space above shops in high street and shopping centres which could be developed into compact accommodation and a complete rethink of large office spaces like Mountbatten House that could with encouragement and financial support be used for single occupancy Use.

The logical conclusion would be to build on areas around Capstone Valley and other smaller areas in the urban area of the Medway Towns with less valuable land.

The advantages of this would be: -

- 1) The farmland is grade 3.
- 2) There is a thriving shopping centre not far away at Hempstead Valley and a bit further down Hoathway, Gillingham Business Park with many large retail outlets, a skating rink, medical facilities, vets, and much more, and a large Tesco and garden centre on the other side of the road. This area alone is the size of Hoo St Werburgh Village.

- 3) Have the council sought to liaise with the neighbouring authority to build up to the Motorway and provide an enhanced road link. There are many miles of open countryside to the south of the motorway easily accessible to residents.
- 4) There is already a large country park and ski slope on the doorstep for the residents to enjoy.
- 5) The area is very close to the M2 providing excellent road links to London and the coast.
- 6) Ash Tree Lane could be improved to give better access to Gillingham from North Dane Way.

Medway is already listed as an area of "Water Stress" and so any developments must be water friendly And rainwater transfer facilities must be incorporated to all new developments

The use of school sports facilities should be encouraged especially at a time when the council continues to allow social and sports clubs on the Peninsula to be closed down and built on.

Medway council should discourage unwarranted development on agriculture lands we must protect the high-quality farming land and the history we have in arable and fruit farming on the Hoo Peninsula. Once this land is concreted on its gone forever

Air quality in and around the Medway tunnel and of course Four Elms Hill and Wainscott areas is a major concern and any increase in road traffic will exacerbate the levels of nitrogen dioxide.

The use of Lodge Hill as a country park would be give not only those on the Peninsula but the whole of Medway a green lung for leisure and recreation and would give much needed health benefits to the whole of Medway's population.

Yours faithfully



Mrs S Babington
Parish Clerk
Hoo St Werburgh Parish Council

Feedback on the Medway Council Local Plan (the development strategy consultation)

I agree with promoting the regeneration of urban waterfront and town centre sites as the core of Medway Council's growth plans, particularly where this increases the potential for the building of houses and apartments given the existing infrastructure and facilities that exist in the areas of Chatham, Rochester Strood Riverside, Gillingham, Rainham and Hempstead Valley. All of these locations are currently well served with a wide choice of schools, shops, employment opportunities, medical centres, health facilities and excellent and frequent transport links. This is where the majority of building to meet the government's housing targets in Medway should be located in my opinion.

Unless there is major regeneration in Chatham and changes to the high cost and location of accessible and safe parking, it is difficult to see how Chatham could become a shopping destination of choice, given the totally different ambiance and range of better shops in Hempstead Valley, Chatham Dockside and Bluewater. In the thirty years that we have lived in Medway we have rarely shopped there with the exception of when Alders and Marks and Spencers were located there. Chatham is rough and dirty in comparison to other shopping destinations and I do not feel at all safe parking in the Pentagon shopping centre currently.

The proposal for creating an urban town focused around the community of Hoo is hugely reliant on new infrastructure. I am very worried about the plans for new housing in Hoo and High Halstow as incrementally more houses are and have been built over the past ten or so years without additional facilities being put in place to support this.

As it is central to government policy that new development should be sustainable the area is already in deficit with regards to capacity, new facilities and infrastructure to meet the needs of new residents in order to mitigate the impact of existing development. Those facilities should be in place now following the building in Hoo let alone in the future to support the additional housing suggested in the Scenario 2 for a rural town at Hoo.

I don't believe that further housing development in Hoo or High Halstow should be considered until there is clarity and funding in place for the necessary infrastructure to support "sustainable development". High Halstow should be left as a rural village and any development plans should ensure that supporting infrastructure for (as a minimum) healthcare and primary school capacity exists within the village.

Point 1 –The development of Medway and particular any further building applications for the Hoo Peninsula must be dependent on infrastructure improvements in that area to provide the capacity to serve the needs of the area's growing population.

Point 2 - High Halstow should not significantly increase in size as this will adversely affect the community and quality of village life that currently exists.

Point 3 – Development should be in the main Medway Town areas where there is significant existing infrastructure which could be expanded to support additional housing.

The Medway Monitoring Report states that the death rate in Medway is higher than the rest of the South-East and the national level generally. Life expectancy in Medway has fallen again during 2016 to 78.4 years for males and 82 years for females. By ward the rates are quite striking with 77.2 years for males and 82.3 years for females in Peninsula Ward compared to Hempstead and Wigmore where this is 83.5 years for males and 84.7 years for females.

According to your Monitoring Report (Dec 2017), the Hoo peninsula is poorly served at present for access to doctors and medical centres and healthcare facilities. The monitoring report states that there are 72 GP practices with a total of 156 GPs serving a patient population of 291,276. This equates to 1627 patients per GP. This is significantly higher than the national benchmark of 1365 patients per GP. IN addition, the latest statistics on hospital bed numbers suggest there is a deficiency in overnight and daytime beds compared to the national average (NHS England Bed Occupation- August 2016) “Overnight beds” there was one bed per 506 people in Medway compared to the England average of 419 and “Day beds” there was one bed per 19,571 people in Medway compared to the England average of one bed per 4,375 people. The report added that there were no current planned capital projects in Medway (Kent and Medway partnership Trust Estates Strategy 2015 -2020). Over recent years Kent and Medway have delivered some of the highest rates of housing delivery in the country, however the infrastructure has not kept up with pace of growth. This has resulted in growing road congestion, increased waiting times to access health facilities etc. resulting in a continued challenge to the quality of life for residents.

Point 4 – It is imperative that plans for additional amenities including access routes, primary schools, healthcare etc. for the Hoo Peninsula are put in place in the short term to increase accessibility and capacity and to deal with the overall increasing population of Medway. Hoo Peninsula residents currently fare disproportionately poorly with regards to access to a range of medical and health facilities. Undoubtedly, this shortfall compared to national and other local areas has to be a contributory factor in the higher death rates and poorer healthcare in the area.

From: [REDACTED]
Sent: 03 April 2018 15:05
To: futuremedway
Subject: Future Medway

Categories: Blue Category

Why out of town shopping centres so popular? Car Parks! We all know the answer but it seems Medway wants to fly against this idea.

- It would appear that has the concept that building more homes with the associated extra vehicles is right when at the same time reducing available parking. For example the Civic/Wingate grounds.
- Strange priorities that we significantly reduce the parking in Commercial Road (Tollgate). It would have been better to spend the money on resurfacing the dreadful Strood High Street and have a much lesser Grand Plan for the car park. I can remember the council saying that the block paving in the high street would be more reliable and cheaper than a traditional surface. Perhaps it is the council idea to offer it as test track to car manufacturers to test suspension systems.
- Yet more homes and vehicles planned for Rochester waterfront when amenities like a good theatre (complement the many other city events and alternative to the London Theatres) and parking would have been better or special accommodation for elderly who would be close to shops, public transport and typically do not have private vehicles.

The plans make a big thing about new many homes for the local community which are affordable to the local community. Just what do you term as affordable – typical price/size and just how many out of the planned total number?

Furthermore what are you doing to prevent those homes being taken by other communities. We all remember how some London boroughs dumped their constituents into Strood homes. The newspapers are full of articles about overseas buying home developments in the South East and forcing up prices and rents.

Turning the restricted route of Canal Road into a normal highway. Although I respect the need for 'Bus Paths' when they are used from Park and Ride into town centres. However these are like the Canal Road route without intermediate bus stops. I think we need to open this route to the peninsular estates and lighten the load using the High Street.

It the same vein why have you never considered before building an access road from Knights Road to Cuxton Road perhaps on the old access road before I think was closed years ago. Or waited so long to extend Knight Road to Roman Way and open all those business parks and alternate routes to Darnley Arch, M2 etc.

1277 Young People get half price bus passes – when our daughter was at school we were told by the council that all 'Bus Fare Concessions' were controlled central government and not their prerogative. We suggested reduced fares etc as she had pay full fare in the morning and was much cheaper to drive her daily. 'Sorry nothing we can do' was the response. Of course years ago that might not have been the fad to reduce private traffic.

We see in other European countries that housing estates for ages are built with recycling in mind and local access to all the bins – what are you doing about this aspect.

By the way these views, particularly the Tollgate Car Park, have come from many people in Strood. Bump into an old friend In Strood and the same views come up – 'why waste money destroying a good car park to make a smaller one than spending it on the terrible roads?'

I look forward to your responses either personally or in some wider publication.

The Future should have started decades ago so why has it taken so long.

P Butcher

The council is preparing a new Local Plan to set out how the area will develop to 2035. We are now consulting local people on how the plan will support the council's vision of 'growth for all'.

We want to hear from residents, businesses, local organisations, community and interest groups to help create the best possible version of Medway. So it is important you take this opportunity to have your say on how Medway should grow.

The consultation period is from Friday, 16 March 2018 until 5pm on Friday, 11 May 2018.

The plan will ensure the area has enough new homes, jobs, and infrastructure to support the expected population growth. It will also focus on preserving Medway's environment and heritage.

Our challenge is to do this in a way that achieves sustainable growth. We need to balance this with the need for homes, jobs and services while conserving our natural and historic environments.

Comprehensive details of how the area might look in coming years can be seen in the Development Strategy consultation document. An introduction to the council's proposed approach to growth in Medway has been published and summarises the four scenarios for how the area could develop.

How can I find out more?

The Development Strategy consultation document is not just about land for housing. The main Development Strategy document is a detailed technical report that sets out the issues Medway faces and draft policies on how we could best address them. It looks at a number of important themes:

- Housing
- Employment
- Retail and centres
- Natural Environment and Green Belt
- Built environment
- Health and communities
- Infrastructure
- Transport
- Minerals, waste and energy

You can find out more:-

Online

You can view the Development Strategy, supporting documents and new, detailed maps of all four scenarios on the council's website at: medway.gov.uk/futuremedway

We have also produced some further summary information about what the development proposals may mean for regeneration, a rural town on the Hoo Peninsula and wider growth in suburban and rural areas.

Links to each section of the Development Strategy are included throughout this consultation form.

Printed copies

You can view a copy of the main report at the reception desk of the council offices at Gun Wharf, public libraries and community hubs across Medway. You can find details of the locations and opening hours of these buildings at: medway.gov.uk. You can also use the public libraries to view the additional information on the council's website.

How can I make my views known?

If you would like to make comments on the proposals in the Development Strategy document, you must submit them in writing by 5pm on Friday 11 May 2018. You can respond in the following ways:

Online: Using this form

The consultation form is designed to allow you to make comments about each of the different things the council has to consider when developing the Local Plan.

For each section there is the opportunity to give your views, and if you wish, to answer the questions that are asked throughout the technical document.

Alternatively you can submit your response

By email: futuremedway@medway.gov.uk

By Post to:

Planning Policy Team

Regeneration, Culture, Environment and Transformation

Medway Council

Gun Wharf

Dock Road

Chatham

Kent ME4 4TR

Your comments and contact details

We will record all written comments as part of the process of preparing the new Local Plan. At the close of the consultation we will review all comments received, look at the key issues raised, and take these into account in working to the next stage of the draft.

All comments will be published on our website - personal details such as addresses of individuals will be removed. We will keep your details on our records and keep you informed about further work on the Local Plan.

We will not share your details, or use them for any other purposes. The responses and contact details will be kept as part of the formal record of the preparation of the Local Plan. This will be for a minimum of five years.

Medway Council will keep the information provided above as confidential. Access to, retention and disposal of this information will be strictly in accordance with data protection requirements. Your personal data will be processed in accordance with Medway Council's Data Protection notice.

If you do not wish to be informed about the work on the Medway Local Plan, please tick here.

Full Name **Chris Fribbins (Clerk, Allhallows Parish Council)**

Email Address **allhallowspc@gmail.com**

Address **42 Quickrells Avenue, Cliffe, Rochester, Kent, ME3 7RB**

Type of Consultee - please select the option that best describes you

Parish Council

Planning positively for Medway's successful future

Growth for all

The council's vision is to achieve 'growth for all' to make Medway an excellent place to live, work, learn and visit.

Medway's population has grown by more than 10,000 people since 2012 to 278,542 in 2016. By 2035 our population could be more than 330,000 people. If we do not plan properly for our growing and changing population there will be greater pressures on:

- Housing - the council knows Medway needs 29,500 new homes by 2035. A government formula may mean this figure goes up to 37,000. We need to identify a housing target for the plan.
- Local services, such as schools and health centres.
- Growth in the local economy- this will be held back and if we do not plan for growth, development will happen on a piecemeal basis.

We also need to promote development that will help to:

- Boost our local economy
- Improve the health of residents
- Address decline in town centres
- Provide new services and infrastructure
- Create a flourishing and attractive environment

Planning positively for Medway's successful future

Medway is a complex and diverse area. A large urban area has grown up between the river and the Kent Downs. There are wide tracts of remote countryside, strategic industrial, energy and transport facilities and good quality farmland. A third of land is of international or national importance for wildlife.

The Local Plan sets out a vision for Medway in 2035 as a leading university waterfront city of 330,000 people, noted for its revitalised urban centres and its stunning natural and historic assets and countryside. It sets ambitions for:

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

You can find out more in the Vision and Strategic Objectives for Medway in 2035 section of the consultation document.

Development strategy

The development strategy section outlines the approach taken to planning for the area's growth, across urban, suburban and rural areas, and sets out four alternative approaches to how Medway could grow to meet the aims of the Local Plan. The council has no preferred option at this stage.

We are approaching growth plans in the following way:-

1. Promoting the regeneration of urban waterfront and town centres

The Local Plan vision places regeneration at the heart of Medway's development strategy.

Regeneration of existing areas is a priority of the Medway strategy for growth. We continue to transform our urban waterfront and bring forward rejuvenation and improvements in some of the town centres.

The redevelopment of underused sites along the urban waterfronts and centres makes the best use of brownfield land and provides opportunities for homes, jobs, services, community and leisure activities and new public spaces.

The council has set out its ambitions for regeneration in our vision document Medway 2035, which promotes a successful economy and growth with benefits for all. You can find this document online

As well as the regeneration of the urban waterfront sites, the plan also promotes opportunities for new development in parts of town centres. This could include new housing, boosting the number of people living in the centres and supporting local shops, services and restaurants. New businesses could be attracted to sites near the town centres.

2. A rural town on the Hoo Peninsula

Local people have told us that they are concerned about pressures on infrastructure. They want to see new housing supported by upgrades to local services and facilities. The council has responded by looking at what growth options give the best scope for improvements in infrastructure. We consider that focusing growth into a small rural town around Hoo St Werburgh would bring these opportunities for new infrastructure. Development of new employment sites as part of the rural town, and nearby sites at Kingsnorth, could help to boost the area's economy.

As well as a mix of housing types, a rural town could provide new country parks, schools, leisure centre, health facilities, new jobs and shops. New transport links could include the opening of a passenger rail service on the Hoo Peninsula. The rural location demands the greatest care in planning for growth to respect the special qualities of the environment and to keep a rural character.

3. Wider growth

A mix of smaller sites in suburban areas, around Rainham and Capstone and other villages, are proposed to provide a range of housing sites. These are of a smaller scale, reflecting difficulties in addressing infrastructure and environmental issues.

The council wants to avoid unchecked growth of the suburbs, which could undermine our ambitions to revitalise town centres and lead to more car based travel. We will also continue to resist inappropriate development in the Green Belt to the west of Medway.

Development strategy

Development scenarios

Each of the four scenarios has a map showing potential developments, you can see where these potential developments are by clicking the link in the descriptions below. The four scenarios all share these common elements.

Homes will be supported by:

- New and expanded schools
- Health facilities
- Leisure and community centres
- Transport upgrades
- Riverside walks
- Parks and play areas

The growth around Hoo would include two new country parks, employment areas, new shops and services, and transport links and services.

Scenario 1: Meeting the housing need of 29,500 homes

Scenario 1 is based on the council's analysis of the number of homes needed to support the area's population growth and change up to 2035. The strategy seeks to firstly direct growth to brownfield regeneration sites. About half of the growth would take place on urban sites where we can make the best use of land. A rural town and some village expansions on the Hoo Peninsula would provide for the improvements in infrastructure to support a wide mix of development. These areas could meet over a third of the growth needed. About a sixth of development would be spread across sites in suburban areas and smaller villages.

It does not involve development on land designated for its environmental importance at Lodge Hill. There would be some buffers of undeveloped land next to these protected areas.

This scenario could deliver about 16,500 new homes on the sites identified in the map. Given the existing 'pipeline' of development, and windfall sites not identified on specific sites, a total of 29,950 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 9,318 homes

Suburban sites: 4,528 homes

Scenario 2: Investment in infrastructure to unlock growth

Scenario 2 - Growth of a rural town on the Hoo Peninsula is dependent on new infrastructure and services. The council is working to secure major funding to upgrade transport and other services in the area. This includes the potential use of the Grain freight railway line on the Hoo Peninsula for passenger services. If we were successful in getting a new train service for the area, this could open up opportunities for new jobs and different approaches to design. We could develop at higher densities in specific locations that are well connected to a new station.

The higher and faster rates of housing delivery in this scenario would reduce the need to release land in some suburban locations. Over 40% of growth would be on the Hoo Peninsula. In comparison with Scenario 1, this would remove land in the Capstone Valley and to the north of Rainham from proposed development allocations.

The higher density rates would boost the number of homes that could be built in the area. This scenario could deliver about 17,500 new homes on the sites identified in the map above. Given the existing 'pipeline' of development and windfall sites, a total of about 31,000 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 11,750 homes

Suburban sites: 3,179 homes

Scenario 3: Meeting government's target of local housing need of 37,000 homes

Scenario 3 - The council has looked at options for how we could reach such a large increase in the land needed for housing to meet the government's target. However, the Local Plan is not just about housing but balanced growth. To find more land for housing we would need to see more of the potential regeneration sites come forward for development. This could include the loss of some employment sites for housing developments. We would also need to release more land in suburban locations, such as to the east of Rainham, and this would make up about a fifth of total growth.

This scenario could deliver about 22,500 new homes on the sites identified in the map above. Given the existing 'pipeline' of development and windfall sites, a total of 35,960 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 14,194 homes

Hoo Peninsula: 12,162 homes

Suburban sites: 6,276 homes

This scenario involves much higher levels of growth in all areas, and would need careful planning and substantial funding of service improvements to deliver sustainable development.

Scenario 4: Consideration of development within Lodge Hill SSSI

Scenario 4 -Previous stages of consultation on the Medway Local Plan referred to the possible use of land at Lodge Hill for a new settlement on the Hoo Peninsula. This involved development on land designated as Site of Special Scientific Interest (SSSI) for its environmental importance. The proposal related to a planning application, which has now been withdrawn. Homes England, the government's regeneration agency, now owns the site. It is preparing a new planning application for a smaller scheme for up to 2000 homes with supporting services. Some of the development would involve building on the SSSI land. Homes England is proposing a scheme where the majority of land would be protected from development. This would include land managed for nature conservation and some new public open space. Development would provide homes as well as the funding to remove unexploded ordnance and manage other land for nature conservation.

The additional land at Lodge Hill would remove the need to allocate some land for development in Stoke and in the Capstone Valley.

This scenario could deliver around 17,000 new homes on the sites identified in the map above. Given the existing 'pipeline' of development including windfall sites, a total of 30,500 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 10,357 homes

Suburban sites: 4,108 homes

Development strategy

Q1 Thinking about our approach, the scenarios and the development strategy section, please answer the following question.

When developing the Local Plan what things do you think the council should consider about the scale of the development needed to support Medway's growth and provide sustainable development?

While accepting the existing growth in population of the Medway Towns there appears to be insufficient consideration of the existing issues for local residents or the pressures that this would bring to the area. There has been a focus on new housing figures by government without an assessment of the local constraints and issues that need to be addressed.

Although there are references to infrastructure issues, there is little detail regarding the specific requirements and which are required for developing relevant sites, or the constraints that this would place on the number of units that could be developed. Masterplan development is required before any assessment can be made on the sustainability of these local plan site proposals. In particular an indicative masterplan of changing Hoo St Werburgh from a large village to a small town is required as this is present in all the scenarios. Connectivity with other villages on the Hoo peninsula is also required as much of the infrastructure is already shared and will be more reliant if these developments proceed.

We have a major concern about the deliverability of the housing demands and the related infrastructure. The number of housing units across the plan area per year is more than the area has ever managed to deliver in recent decades. The government have also indicated the possibility of 'sanctions' if this rate is not achieved and there is concern that speeding this up may jeopardise the delivery of necessary core infrastructure, through reduced requirements on new developments to increase the rate of delivery.

Recent developments (outside of the 2013 village boundaries) approved on the Hoo Peninsula (outside the 2013 Local Plan village boundaries) are missing from consultation maps and the impact of these does need to be considered alongside the new proposals. There are also no indicative figures on the number of housing units for each of the sites proposed.

We are also concerned to see no land allocation for major health facilities on the west side of the River Medway. The previous consultation stage mentioned this as a need for the area – access to facilities at Medway and Darenth Valley Hospitals is already an issue during the day for both patients and visitors from the Hoo Peninsula.

Without a response to these issues, there is difficulty in assessing the sustainability of the plan and the impact on current and future residents is likely to be negatively affected.

There are technical questions asked about the following development strategy policy approaches:-

- Sustainable Development
- Spatial Development Strategy

Development strategy

Policy DS1: Sustainable Development

The purpose of planning is to achieve sustainable development. When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Planning applications that are in conformity with the Medway Local Plan (and where applicable, with policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date, the council will grant permission, unless material considerations indicate otherwise, and considering whether:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in the NPPF indicate that development should be restricted.

Policy DS2: Spatial Development Strategy

The council will seek to meet the development needs for homes, employment and retail land, infrastructure and services, as determined by the evidence base set out in the Medway Local Plan, whilst respecting the need to conserve and enhance the natural and built environment.

The development strategy for Medway prioritises regeneration, making the best use of underused and previously developed land and directing investment to urban waterfront and centre opportunity areas. The council will encourage sustainable development in appropriate urban regeneration sites to deliver housing, employment, retail and community uses, establishing a quality and accessible public realm, including the extension of a riverside walk. Chatham will provide the focus for new retail and community facilities. Appropriate opportunities to capitalise upon the learning quarter at Chatham Maritime will be positively considered.

Outside of the regeneration areas, the council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting and supported by significant infrastructure investments. The development will be in accordance with a masterplan, to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to a range of services and infrastructure.

The council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.

Strategic green infrastructure zones throughout urban and rural Medway will promote a natural capital approach, and secure benefits for nature and people and provide separation of settlements.

DS1a Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

Yes

No

DS1b Please explain why you think proposed spatial development strategy does / doesn't represent the most sustainable approach to managing Medway's growth

By failing to identify the specific infrastructure interventions that would be required to support a small town at Hoo St Werburgh and their delivery, there cannot be any assurance that the proposed scale of development is sustainable.

There are already concerns about the capacity road system (A228/Four Elms Roundabout/A289 Bypass/Frindsbury Hill) to support the housing that has already been approved and the additional housing numbers (although site allocations have to be assumed as they are not published) as well as commercial developments that are already taking place and assumed as part of the plan).

Health facilities are under pressure (and access to hospitals in Gillingham or Dartford) will be compromised by this scale of development. Although buildings can be provided there is little confidence that the required skilled staff can be recruited to run them. In fact, there are examples of some medical facilities that are underused because of this already.

Residents do also have concerns about the provision of water (and sewage), electricity, gas and mobile phone/broadband services already.

DS1c What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

A more detailed infrastructure plan is required (and a master plan of the Hoo St Werburgh small town with connections to the other local villages).

Town Centre sites should be re-assessed to see if further housing capacity can be encouraged (in particular with reference to the drop in retail premises and the existing infrastructure and need to support and grow community facilities for the existing population.

Housing

This section provides details of Medway's housing need, with a main Housing Delivery policy and nine supporting housing policies to help get the right mix of housing required in Medway to accommodate a growing population with diverse needs.

Q2 Thinking about the Housing section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's housing needs?

Infrastructure – especially highways peak capacity issues at the A228/A289 roundabouts (Sans Pareil and Four Elms, Health and specific Education facilities need to be addressed before the level of housing can be assessed as sustainable.

There are technical questions asked about the following housing policy approaches:-

- Housing Delivery
- Housing Mix
- Affordable Housing
- Supported Housing, Nursing Homes and Older Persons Accommodation
- Student Accommodation
- Mobile Home Parks
- Houseboats
- Houses of Multiple Occupation (HMOs)
- Self-build and Custom Housebuilding
- Gypsy, Traveller and Travelling Showpersons

Housing Delivery

Policy H1: Housing Delivery

The council will determine a housing target for the Medway Local Plan, responding to the latest relevant information, in preparing its draft Local Plan.

The council will seek to provide a supply of land 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.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.

Development of a strategic allocation for a rural town on the Hoo Peninsula will be in accordance with the council's development framework for Hoo.

H1a Does the proposed policy for housing delivery represent a sound approach?

~~Yes~~

No

H1b Please explain why you do / don't think the proposed policy for housing delivery represent a sound approach

The policy cannot be fully assessed without the Masterplans, coordination of infrastructure and service provision. The idea of a small town at Hoo St Werburgh was part of the 2017 consultation on the Development Strategy but the provision of services appears to have regressed with no land use allocation for a significant health facility on the western side of the River Medway, or schools (both which would have significant additional pressures on the local road network). Allocation of specific sites (as proposed in this consultation) is flawed without more detail on the infrastructure interventions.

The consultation is also not up to date with significant, recent, housing developments included in the consultation and already creating infrastructure demands and other pressures (especially around Hoo and Chattenden)

The deliverability of these housing numbers also needs further investigation. If delivery falls behind the level required to achieve the numbers indicated in the plan there will be more pressure to develop faster (and cheaper) and infrastructure and community facilities may be dropped or down-graded.

H1c Would you suggest an alternative approach?

A more detailed investigation into the capacity of the Hoo Peninsula and Town Centre sites is required as well as Masterplans and Infrastructure needs before this level of development can be accepted as sustainable.

Housing Mix

Policy H2: Housing Mix

The council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population.

Residential development will be permitted to encourage a sustainable mix of market housing to include an appropriate range of house types and size to address local requirements.

The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

Accommodation requirements as detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform which house sizes and mix should be delivered in urban and rural areas to meet the objectively assessed needs of the area.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council's housing register and discuss affordable housing requirements with the council's Housing Strategy team at the pre-submission stage of the planning process.

Large development schemes meeting the criteria set out at Policy H9, must demonstrate that sufficient consideration has been given to custom and self-build plots as part of housing mix.

The council will work with partners to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people.

Gypsy, Traveller and Travelling Showpeople accommodation requirements will form part of the borough's need for housing.

H2a Does the proposed policy for housing mix represent a sound approach?

~~Yes~~

No

H2b Please explain why you do / don't think the proposed policy for housing mix represent a sound approach.

There is little identification or allocation of sites for specific local community needs rather than Medway wide. Low cost and affordable housing is a broad-brush approach and often leads to housing being allocated to people from outside of the area through Housing Associations, above local need.

H2c Would you suggest an alternative approach?

More recognition of local community needs (especially in parished areas).

Affordable Housing

Policy H3: Affordable Housing

On housing and mixed use development sites of 15 or more residential units the council will require the delivery of affordable housing.

The council will apply the following requirements for affordable housing provision:

- in rural Medway 30% of all residential units for developments of 15 or more dwellings
- in urban Medway 25% of all residential units for developments of 15 or more dwellings

Provision must be in accordance with the council's Guide to Developer Contributions and Obligations.

There will be a strong presumption in favour of the affordable homes being fully integrated within the proposed development. However the council may consider off site provision, where this enables other policy objectives to be met, subject to an equivalent level of developer contribution being provided.

Where affordable housing is to be provided offsite, the council's preferred position is for developers to directly providing affordable dwellings on an alternative site. Only where it can be demonstrated that this can not be provided, would the council consider a financial contribution from the developer which would enable provision through new build on an alternative site.

H3a Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision?

Agree

~~Disagree~~

H3b Please explain why you agree / disagree with threshold for contributions for affordable housing and the percentage requirements for its provision.

Caution must be exercised where developers agree an allocation, but then return to argue that the economics of the scheme have changed.

H3c What do you consider would represent an effective alternative approach?

H4 What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

This needs to be driven by more local needs. Schemes to lock in the low cost/affordable element should be given priority (perhaps providing technical and admin support to local communities, especially parish councils) to provide these.

Supported Housing, Nursing Homes and Older Persons Accommodation

Policy H4: Supported Housing, Nursing Homes and Older Persons Accommodation

The development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:

- Meets a proven need for that particular type of accommodation.
- Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs.
- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.
- Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.

Loss of specialist housing will be permitted only where it is demonstrated that there is no need for the form of accommodation.

H5a Do you agree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?

Agree

~~Disagree~~

H5b Please explain why you agree or disagree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation.

The only concern is the loss of this form of specialist housing in recent years and the need to provide extra to cover the shortfall.

H6a Do you consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs?

Yes

~~No~~

H6b Please explain why you do / don't consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs

Although there is a place for retirement villages etc. they should be integrated with the local community – perhaps through the development of facilities shared with the local community.

H7a Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme?

Yes

~~No~~

H7b Please explain why you do / don't consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme

This scale of housing would create a scale of development that would help the viability of a scheme rather than stand-alone.

Student Accommodation

Policy H5: Student Accommodation

The council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.

Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need.

The council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, and does not have a negative impact on the core functions of the town centres, and is consistent with strategic redevelopment plans.

These locations must be well served by public transport and accessible to a wide range of town centre, leisure and community uses.

Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land or leisure or community space.

Student housing will be required to provide a high quality living environment and include a range of unit sizes and layouts with and without shared facilities to meet requirements of the educational institutions they serve.

H8a Do you agree with the proposed policy for student accommodation?

Agree

~~Disagree~~

H8b Please explain why you agree or disagree with the proposed policy for student accommodation.

Student accommodation can be very supportive of the town centre economy.

H8c Would you propose an alternative approach?

n/a

Mobile Home Parks

Policy H6: Mobile Home Parks

Proposals for mobile or park home developments will be given the same consideration as other dwellings and will be subject to the same compliance with planning policy in assessing impact and sustainability.

The council seeks to protect existing parks from competing uses, but restrict their expansion outside designated areas. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area particularly those near areas of sensitive environmental interests.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home Park, or a reduction in the area available for their use will not be permitted.

The council will set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

Any proposals for updates or intensification must have careful consideration for the colour, massing and materials used, incorporate appropriate landscaping and have no adverse impact on the character of the locality or amenity of nearby residents.

H9a Do you agree with the proposed policy for mobile home parks?

Agree

~~Disagree~~

H9b Please explain why you agree or disagree with the proposed policy for mobile home parks.

There is a need for this class of housing, although it should be integrated with the local community where possible and any expansion should provide support for shared wider community facilities.

H9c Would you propose an alternative approach?

n/a

Houseboats

Policy H7: Houseboats

The council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim:

- To protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place.
- To specify criteria under which any further growth of houseboats will be allowed in order to minimise impact.
- To seek the removal and disposal of any vessel so moored if a boat sinks, or becomes unfit for habitation, derelict, or is otherwise abandoned.
- To seek opportunities to deliver improvements that benefit the local amenity and environment.

H10a Do you agree with the proposed policy for houseboats?

Agree

~~Disagree~~

H10b Please explain why you agree or disagree with the proposed policy for houseboats

n/a

H10c Would you propose an alternative approach?

n/a

Houses of Multiple Occupation (HMOs)

Policy H8: Houses of multiple occupation

The council seeks to avoid detrimental over concentrations of HMOs. Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where they:

- Do not adversely affect the character and amenity of the area, or the supply of family housing.
- Do not contribute to the over concentration of HMOs in a particular area.
- Do not contribute to the generation of excessive parking demands or traffic in an area.
- Make appropriate provision for the storage of waste

H11a Do you agree with the policy approach for HMOs?

Agree

~~Disagree~~

H11b Please explain why you agree or disagree with the policy approach for HMOs.

n/a

H12a Do you consider that the council should set locational criteria for HMOs, such as consideration neighbouring uses and proximity to other HMOs?

Yes

~~No~~

H12b Please explain why you agree or disagree that the council should set locational criteria for HMOs.

n/a

H13a Should the council make use of Article 4 Directions to restrict the ability to convert properties to HMOs?

Yes

~~No~~

H13b Please explain why you agree or disagree that the council should make use of Article 4 Directions to restrict the ability to convert properties to HMOs

n/a

Self-build and Custom Housebuilding

Policy H9: Self-build and Custom Housebuilding

The council will support self-build or custom build home development in sustainable and suitable locations.

To identify and provide for people who wish to build their own home, the council will maintain a register of interested parties and report the headline data annually on the council website after the end of each base period.

All new self-build/custom housebuilding applications

- Applicants will need to have regard to the local landscape and guidance from other relevant Local Plan policies in the same way that other types of residential applications do; this will ensure all types of new development are of high quality.
- If the number of self build plots on a single site exceeds 10, then a design code framework should be agreed with the council prior to the submission of individual planning applications. This will ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality.
- In accordance with Government guidance on Self-Build and Custom Housebuilding, the plots must be serviced (have access to a public highway and connections for electricity, water and waste water) or, in the opinion of a relevant authority, can be provided with access to those things within the duration of a development permission granted in relation to that land.
- Where a land owner has a suitable small site that they wish to obtain speculative outline residential permission for, they are encouraged to consider the plot for self-build or custom housebuilding, depending on the local demand.

Expanding/intensifying existing residential permissions

Where there is an existing residential permission and the developer approaches the council seeking to expand/intensify the development, the developer should demonstrate that they have considered some/all of the additional plots to be provided as serviced self/custom build plots, where there is identified demand.

Neighbourhood Plans

The council supports the consideration of self-build and custom housebuilding in the preparation of Neighbourhood Plans, and joint working with Neighbourhood Plan groups to establish a locally derived design code.

Council owned land and Regeneration

The council will consider opportunities for self-build housing in disposal of Council land and in promoting regeneration schemes.

H14a Do you agree with the self build and custom housebuilding approaches taken above?

Agree

Disagree

H14b Please explain why you agree or disagree with the self build and custom housebuilding approaches taken above

n/a

Self-build and Custom Housebuilding

Self Build Site Allocations

In considering site suitability, some sites have been identified from the Strategic Land Availability Assessment (SLAA) as having potential for self build and/or custom housebuilding use. Some of the larger sites may have potential for a proportion of the area to be suitable for self/custom build. The Council may seek to secure planning permission on any sites allocated for self/custom build by way of Local Development Orders after the Local Plan is adopted.

H15a Do you think that the council should allocate specific sites for self/custom housebuilding development?

~~Yes~~

No

H15b Please explain why you agree or disagree that the council should allocate specific sites for self/custom housebuilding development.

Sites may become available across the area and considered as they arise in accordance with these policies. There will need to be protection to avoid the principle of self-build being used to establish residential use (due to its special nature/allocation) and then a subsequent general housing development (probably at a higher density) coming forward and being developed instead.

If we do allocate self/custom build sites, we will advertise them on our website. The land owner would also be expected to market the site. When allocating a site/part of a site for self/custom build, it is important that there is realistic expectation of interest in the site. However, due to circumstances out of the control of the council and land owner, the site may not receive the interest that had been anticipated. We therefore propose that once an allocated site has sold and built out a certain proportion of the self build plots, if the land owner is unable to sell the remaining plots after marketing them for a further period of time (to the satisfaction of the council), they will then be allowed to firstly offer the plot(s) to the council/housing association, before being allowed to build out on the plot themselves or sell to a non self/custom builder/developer.

Yes

~~No~~

H16b Please explain why you agree or disagree with the approach set above

n/a

H16d After what further period of time of unsuccessful marketing do you feel it would be acceptable to offer the remaining plots on to the council/housing association or other non self/custom builders?

1 years

Self-build and Custom Housebuilding

Sites over 400 dwellings

In order to satisfy the demand from the register, we propose that applications on sites over a certain number of dwellings should make available at least 5% of the plots to self/custom builders for purchase. We suggest a threshold of 400 dwellings and over. The developer will need to provide robust evidence to demonstrate if this is not economically viable. This would apply to applications on new Local Plan housing allocations or windfall sites.

H17a Do you agree that sites over a certain size should offer a percentage of the plots to self/custom builders?

Yes

~~No~~

H17b Please explain why you agree or disagree that sites over a certain size should offer a percentage of the plots to self/custom builders

n/a

Following on from the question above, if a plot has been marketed (to the satisfaction of the council) for 12 months and not sold, we propose that it can then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market.

H18a Do you agree with this approach outlined above?

Agree

~~Disagree~~

H18b Please explain why you agree or disagree with this approach

n/a

With regards to these large sites of 400 dwellings or over, in order to prevent the completion of the overall site from being drawn out, exposing existing residents to extended periods of construction by their neighbours, we propose that if a plot is purchased by a self or custom builder, the dwelling must be built within 3 years of the date of sale, before being offered to other applicants on the self build register to purchase. If there is no interest, then it may then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. The onus would be on the developer to advise the council when each plot had been sold in order to monitor the development.

H19a Do you agree with this approach outlined above?

Agree

~~Disagree~~

H19b Please explain why you agree or disagree with this approach

n/a

Gypsy and Traveller Accommodation

Policy H10: Gypsy, Traveller and Travelling Showpersons

Safeguarding Existing Sites

Existing permanent authorised gypsy and traveller sites and sites for travelling showpeople will be retained, unless:

- There is a surplus of available accommodation over and above the required five year supply of sites, or,
- The site will be replaced by a site of similar proportions in an appropriate location which complies with the criteria listed below for new sites, or,
- A site has been granted a personalised permission restricting residency to a named occupier or family.

New Sites

Proposals for new gypsy, traveller and travelling showperson sites (temporary or permanent) will be permitted, in accordance with the council's planning policies if they meet the following criteria:

- Need – the council is satisfied that there is a clear need for the site and the proposal cannot be met on existing available sites or an allocated site
- Location – within an accessible walking distance to local facilities for education, healthcare, and convenience retailing.
- Not located in the Green Belt, flood risk zones 2 & 3, areas covered by landscape or environmental designations (AONBs, SSSI, Ramsar, SPA, SACs, Ancient Woodland or local nature reserves), protected open spaces or protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas), or the best and most versatile agricultural land, of Grades 1, 2 or 3a).
- Scale – a site should respect its location and surrounding environment and be embedded within it and not intrude onto the landscape. The council will require a landscape strategy as part of the application to confirm the details of this.
- Pitches and plots should be of a sufficient size and, on sites for Travelling Showpeople have space for adequate storage.
- Access – there is safe and convenient pedestrian and vehicular access to the public highway, with adequate space on site for vehicle turning and parking

H20a Does this represent a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs?

Yes

~~No~~

H20b Please explain why you agree or disagree that this is a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs

n/a

H21a Do you consider that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan?

Yes

~~No~~

H21b Please explain why you agree or disagree that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan

More detailed site investigation and assessment will be required before any site can proceed. A policy should be developed that outlines acceptable criteria and should be put out for consultation before adoption.

Employment

This section sets the context of Medway's economy, with details of land needed for employment sites, and how we can boost the local economy, particularly in securing better quality jobs and benefiting from links with our universities and colleges. These inform the main 'economic development' policy and Medway's key economic sectors including the rural economy and tourism including associated visitor needs.

Q5 Thinking about the employment section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's economic needs?

The infrastructure needs, especially transport will be key to meeting economic needs. The needs of the wider area will also contribute to a positive environment for economic development.

There are technical questions asked about the following employment policy approaches:-

- Economic Development
- Rural Economy
- Tourism
- Visitor Accommodation

Economic Development

Policy E1: Economic Development

The council will seek to boost Medway's economic performance, securing a range of jobs for its workforce. The council will work positively with the local business community and major public sector employers, the Universities at Medway and further education providers, inward investors, strategic partnerships and neighbouring authorities to support sustainable economic growth and job creation.

The council will make provision in Medway for the scale, range, quality and locational requirements of employment land identified in the Employment Land Needs Assessment, 2015, or subsequent updated evidence. This will involve the safeguarding of sites, identification of redevelopment and investment opportunities, and allocations for new sites.

The plan will seek to increase the productivity of Medway's economy, as measured through GVA, through support for higher value employment. This will include the designation of specific employment sites as suitable for higher value employment. All planning applications for employment uses will be assessed for their GVA contributions and whether the proposed use is best aligned to the site characteristics and locational offer. The council and its partners will promote growth of employment sectors that have the best potential for higher value jobs.

The council will support actions to:

- Consolidate economic benefits from the regeneration programme in Medway, specifically seeking to strengthen the role of the town centres in providing wider job opportunities;
- Raise skills levels and provide apprenticeship and local labour opportunities;
- Realise opportunities for raising higher value employment through supporting the development of the Universities at Medway and the wider learning quarter, and linking to growth in the wider economy;
- Seek to accrue benefits for Medway's economy from strategic developments of infrastructure, housing and employment sites outside of the borough;
- Explore the extension of the successful Medway Innovation Centre model to provide additional serviced employment space for businesses;
- Seek the installation and upgrade of high speed broadband services in employment sites;
- Promote the diversification of Medway's economic base; and
- Secure sustainable employment uses for the strategic sites at Grain and Kingsnorth, achieving value from the specific location offer and the access to water and rail for freight movements, and realising opportunities for manufacturing of modern modular construction facilities.

E1a Do you consider that this is an effective approach to securing and strengthening Medway's economy?

Yes

No

E1b Please explain why you think that this is / is not an effective approach to securing and strengthening Medway's economy

It is relatively easy to allocate employment land, but difficult to fill (some of the site identified have been identified for decades but remain undeveloped).

An approach to assess the impact on local infrastructure needs, environmental and landscape impacts needs to be enhanced and incorporated with other pressures. There may also be pressure on schools/nurseries and employees seek provision close to their place of work.

E2 Which locations do you consider are the most appropriate for employment growth?

n/a

E3a Do you agree with the proposed approach to assessing GVA with planning applications for employment uses?

Yes

~~No~~

E3b Please explain why you agree or disagree with the proposed approach to assessing GVA with planning applications for employment uses

Supported, although appropriate small sites in or adjacent to villages should also be considered.

E4a Do you support the proposed approach for higher value jobs in Medway?

Yes

~~No~~

E4b Please explain why you support / do not support the proposed approach for higher value jobs in Medway

n/a

E5a Do you consider that there is demand for further serviced office accommodation in Medway?

Yes

~~No~~

E5b Please explain why you consider / do not consider that there is demand for further serviced office accommodation in Medway

With the growth in home-based employment, support facilities should be developed in local communities (villages) to provide a wide range of local services above just serviced offices.

Rural Economy

Policy E2: Rural Economy

The council will support the land based sector in Medway, through seeking to direct development to land of lesser agricultural land, where feasible, and promoting the sustainable development and diversification of farming and other land based rural businesses, where the proposals can demonstrate positive benefits and do not conflict with other policies in the Local Plan. The council will define countryside areas outside of the urban and village settlement boundaries, where the land based economy will be supported providing that it does not conflict with requirements to conserve and enhance the environment.

The council will support the growth of rural businesses in well-designed development in appropriate locations that respect the character of the countryside and environmental features. Sustainable rural tourism and leisure activities that are in keeping with their rural setting will be supported.

The council will seek the retention of key rural services and facilities to promote sustainable villages, providing for the needs of rural residents.

E6a Do you agree with the proposed policy approach for the rural economy?

Agree

~~Disagree~~

E6b Please explain why you agree / disagree with the proposed policy approach for the rural economy

Support for rural businesses will also require more local support and services (see E5a)

E6c What alternative approaches would you propose?

n/a

Tourism

Policy E3: Tourism

The council will positively promote sustainable tourism development that can make a positive contribution to Medway's economy and cultural life. Appropriate proposals for the development of tourism facilities and visitor accommodation will be supported where they meet the principles of sustainable development.

Tourism developments that can contribute positively to the regeneration of Medway, consistent with the council's vision, and extend the cultural offer will be considered favourably. Opportunities for development to enhance the vibrancy and vitality of town centres will be welcomed.

The enhancement of cultural assets and visitor facilities will be supported, where they respect the integrity of the surrounding area, particularly those assets associated with the local historic environment.

Opportunities to support the development of rural and marine based tourism will be welcomed, where they can demonstrate that negative impacts on the environment can be avoided.

Proposals for tourism facilities will be assessed against the principles below:

- Identified need for creation, expansion or improvement of tourism facilities.
- The proposal is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment.
- Maximises opportunities for sustainable travel.

E7a Do you agree with the proposed policy approach towards tourism?

Agree

~~Disagree~~

E7b Please explain why you agree or disagree with the proposed policy approach towards tourism

There is scope for developing tourism in the rural areas, but there does need to be some assessment and management of impacts to the environment and infrastructure.

E7c Would you suggest an alternative policy approach?

n/a

Visitor Accommodation

Policy E4: Visitor accommodation

The retention and provision of visitor accommodation is encouraged in accordance with the principles set out below:

- Where it meets a proven need, particularly those sectors of the market where evidence indicates unmet demand, such as a high quality boutique hotel in Rochester, and quality rural self-catering accommodation.
- Development enhances the quality and offer of existing visitor accommodation and its setting.
- Where the proposal contributes to the vibrancy, vitality and viability of town centres and the sustainability of wider settlements.
- Where the proposal avoids negative impacts on the environment, is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment, avoids siting in areas of high flood risk and intrusion into the landscapes of open countryside.
- Maximises opportunities for sustainable travel in accessible locations and minimises traffic generation.

E8a Do you agree with the proposed policy approach towards visitor accommodation?

Agree

~~Disagree~~

E8b Please explain why you agree or disagree with the proposed policy approach for visitor accommodation

Support and policies for Bed and Breakfast, Tourist Caravan Parks, Holiday Parks (Haven), Allhallows Place, Rural Hotels etc. do need to be developed as well.

E8c Would you suggest an alternative policy approach?

n/a

Retail and Town Centres

This section provides details of Medway's retail strategy, and considers the relationship between Medway's town centres and out of centre retail locations and retail parks. There is associated policy guidance to support and strengthen our town centres, neighbourhood and village centres and considering how Medway needs to respond to the major changes that have been taking place in shopping patterns over recent years.

Q8 Thinking about the retail and town centres section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?

There are technical questions asked about the following retail and town centre policy approaches:-

- Retail Hierarchy
- Sequential Assessment
- Impact Assessments
- Role, Function and management of uses in centres – Frontage
- Temporary uses
- Supporting Sustainable and Healthy centres
- Hempstead Valley District Centre
- Dockside
- Medway Valley Leisure Park
- Healthy sustainable communities
- Local Centres and shopping parades
- Retail Parks

Retail and Town Centres

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Q8 Thinking about the retail and town centres section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?

It will be important to assess the impact of retail and town centres on each other and ensure transport infrastructure is available to satisfy those needs. Quality public realm needs to be provided and well maintained. Marketing/tourist plans should be developed and widely publicised.

There are technical questions asked about the following retail and town centre policy approaches:-

- Retail Hierarchy
- Sequential Assessment
- Impact Assessments
- Role, Function and management of uses in centres – Frontage
- Temporary uses
- Supporting Sustainable and Healthy centres
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- Retail Parks

Retail Hierarchy

Policy RTC1: Retail hierarchy

The function of centres as multi-purpose destinations and the main locations for retail, community, leisure and employment will continue to be supported in relation to their individual role and scale. Chatham is the primary centre at the top of the hierarchy and will be the focus for the majority of comparison retail to meet the strategic needs for the authority and maintain its role in the hierarchy.

Medway's hierarchy of centres is:

I. Principal Town Centre: Chatham is the main location for comparison retail, community uses, leisure, culture and tourism (in support of local heritage assets and cultural focus).

II. District Centres: The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres: Strood, Gillingham, Rainham, Rochester, Hempstead Valley.

III. Local Centres: The authority seeks to maintain the sustainably accessed local top up shopping offer and to satisfy the day-to day needs of the local population.

New local centres or shopping parades compliant with the council's retail policies may be required in the following locations depending on the defined development strategy and proposals maps in the Local Plan, the scale of the proposal.

- Hoo St Werburgh rural town
- Rainham East
- Capstone

Proposals will need to be supported by a robust justification talking into account the existing provision, character and scale of the area and the demographics.

RTC1a Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway?

Yes

~~No~~

RTC1b Please explain why you consider / don't consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway

There does need to be more support for local top-up shopping and the provision of 'core' services that reduce the need to travel into District and Town Centres for basic items.

RTC2a Do you agree with the definition of Chatham as the primary centre at the top of the hierarchy?

Agree

Disagree

RTC2b Please explain why you agree or disagree with the definition of Chatham as the primary centre at the top of the hierarchy

This assumes the development of further employment, retail and entertainment in the area rather than out of town locations.

RTC3a Do you agree with the identified district centres?

Agree

~~Disagree~~

RTC3b Please explain why you agree or disagree with the identified district centres

n/a

RTC4 How do you consider that Dockside should be recognised in Medway's retail hierarchy?

Specialist Retail, Entertainment and Tourism

RTC5 Would you propose any alternative approaches to Medway's retail hierarchy?

No

Sequential Assessment

Policy RTC2: Sequential Assessment

Main town centre uses are directed to Medway's centres as identified in policy RTC1.

Proposals to locate or expand main town centre uses outside of defined centres, and where not in accordance with any part of the retail and main town centre uses strategy in the development plan, are required to demonstrate through a sequential assessment, within an agreed and defined catchment area, that there are no sequentially preferable sites available in accordance with the following sequence:

I. Chatham

II. Strood, Gillingham, Rainham, Rochester

III. Hempstead Valley Shopping Centre

IV. Local centre or edge of centre, whichever is better connected and able to support 1, 2 or 3 listed above

V. Out of centre

When considering sequentially preferable edge and out of centre sites, following demonstration of the unavailability of more central sites, preference will be given to edge and out of centre sites that are accessible and well connected to town centres respectively, i.e. consideration of edge of centre sites first.

The catchment area must be defined through discussions with the authority at the earliest opportunity and is dependent on the scale and type of the proposal and its ability to draw trade.

Large scale leisure proposals must be accessed by sustainable means, not have a negative impact on traffic and provide ease of access.

Proposals for ancillary development are required to be compliant with the policy set out above unless it can be:

- Justified as ancillary and necessary for the business operation;
- the type of use and scale of the proposal is secondary to the predominant/main use;
- demonstrated that there are dependencies between the proposal and the predominant/main use. Consideration will be given to the location of the proposal in relation to the predominant/main use;
- it may be necessary to manage the ancillary use through condition to maintain its secondary nature

The scale of the proposal may also require an impact assessment and therefore requires compliance with policy RTC3 where it meets the criteria.

RTC6a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Yes

No

RTC6b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

n/a

RTC6c Do you agree with the proposed sequential approach?

Agree

Disagree

RTC6d Please explain why you agree or disagree with the proposed sequential approach

n/a

RTC6e Would you propose alternative approaches?

n/a

Impact Assessments

Policy RTC3: Impact Assessments

Proposals that seek to locate or expand retail and other main town centre uses in edge or out of centre locations will be permitted where:

- a) it is supported by an impact assessment where proposals for comparison, convenience retail, or commercial leisure development exceeds a defined threshold set in the Local Plan; or other large scale leisure and office uses exceeds 2,500sqm.
- b) it is demonstrated that it would not have a significant adverse impact on:
 - Impact on the strategy - development, retail and main town centre uses strategy
 - Impact on vitality and viability of centres within the catchment of the proposal
 - Impact on existing, planned or committed town centre investment
 - Consideration is given to the cumulative impact of proposals considered relevant and to the health of centres

is given to the local context and the vulnerability of the authority's centres

- c) Where appropriate development proposals may be conditioned to reduce the impact on centres where there is an impact but is not considered significantly adverse to justify refusal.

RTC7a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Yes

~~No~~

RTC7b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

Need to also identify highways local shopping centre impacts.

Ongoing impacts also need to be undertaken and policies developed rather than a point in time prior to development.

RTC8a Do you agree with the proposed approach to impact assessments?

Agree

~~Disagree~~

RTC8b Please explain why you agree or disagree with the proposed approach to impact assessments

n/a

RTC9a What do you consider would represent an appropriate size threshold for developments to undertake an impact assessment?

n/a

RTC9b Would you propose alternative approaches?

n/a

Role, Function and management of uses in centres – Frontage

Policy RTC4: Frontages

Proposals within frontages of centres must be in accordance with the council's design policies and:

- provide an active frontage at ground floor level, which is accessible and attractive to pedestrians. The presence of a larger proportion of show window space is required.
- be of appropriate scale, format, design and character reflective of the facades above ground floor, the centre's role and function and the Council's ambitions as set out in RTC1 and RTC5
- Protect and where possible enhance the public realm through well planned and coordinated planting, improvements to surfacing/paving and other environmental enhancements.
- Must demonstrate no harm to other neighbouring businesses, residential public and visual amenity through impacts such as noise, light, odour, late night activity, litter and general disturbance.
- Any proposals for shutters must maintain views into shops when closed, be back lit, powder coated and any housing should relate well to shop frontage and signage.

Policy RTC5: Role, Function and management of uses in centres – Frontage

The council seeks to establish a robust, vital and viable retail core in support of competitive, sustainable and healthy centres compliant with its retail policies. A mix of uses is supported with due consideration of avoiding an overprovision or concentration of the same type of uses.

Primary Frontage

Proposals for non-A1 uses within the primary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy provided the provision of A3 uses do not result in an over concentration in Rochester District Centre.

Where the proposal results in the loss of A1 premises, permission will be granted where:

- i. it is consistent with the policy above.
- ii. in all other cases the unit has remained vacant for at least 6 months and the applicant can demonstrate:
 - reasonable attempts were made without success to let the premises for A1 use;
 - that the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy of the centre.

Greater efficiency in the use of upper floors will be supported and encouraged.

Secondary Frontage

Proposals for non-A1 uses within the secondary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy and where provision of A3 uses does not result in over provision in Rochester district centre.

Where the proposal results in the proportion of A1 representation falling below the threshold defined by the council and/or results in the loss of A1, A3, D2, community and cultural uses, permission will be granted where:

- reasonable attempts were made without success to let the premises for the last use
- the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy.

RTC10a Do you agree that this proposed approach represents an effective approach to planning for the city and district centres in Medway?

Agree

~~Disagree~~

RTC10b Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for the city and district centres in Medway

n/a

RTC11a Do you consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

~~Yes~~

No

RTC11b Please explain why you consider / don't consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f in the Development Strategy Document

n/a

RTC12a Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

Agree

~~Disagree~~

RTC12b Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f in the Development Strategy Document?

Yes

RTC13 Do you consider that there are alternative approaches to manage this aspect of Medway's main centres?

n/a

Temporary uses

Policy RTC6: Temporary uses

Proposals for a temporary use of vacant units within town and local centre frontages will be supported for a period of up to 6 months where compliant with the council's design and retail policies and:

- where the unit has been vacant for at least 2 months;
- where the proposed use makes a contribution to the vitality and viability of the centre;

Erection of structures for the operation of the business must be easily removable

Temporary permissions will only be renewed for a single additional period where:

- The original temporary permission was granted for a period of less than 4 months
- Reasonable attempts were made to let the premises without success
- The current temporary use can demonstrate benefit to the centre and success of business.

RTC14a Do you agree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway?

Agree

Disagree

RTC14b Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway

Mention should also be made for similar temporary community use in local centres

RTC14c Would you propose alternative approaches?

n/a

Supporting Sustainable and Healthy Centres

RTC7: Supporting Sustainable and Healthy centres

Development proposals will help to create healthy and sustainable places, recognising the cumulative effect individual units and specific uses can have on the success of places.

The council will seek to manage the concentration and mix of specific premises to strengthen its centres and support healthier communities.

RTC15a Do you agree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area?

Agree

~~Disagree~~

RTC15b Please explain why you agree or disagree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area

n/a

RTC16a The council considers such specific uses to include 'high energy density food' outlets, which sell foods high in fat and/or sugar; betting shops; gaming centres; and premises selling alcohol, particularly for off licence sales.

Do you agree with this definition?

Agree

~~Disagree~~

RTC16b Please explain why you agree or disagree with the definition

n/a

RTC16c Do you think that the list should be amended?

No

RTC17a Do you think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above?

~~Yes~~

No

RTC17b Please explain why you think / don't think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above

Reduction in flexibility and use of otherwise vacant properties.

RTC18a Do you think that such uses should be restricted near schools and youth facilities?

~~Yes~~

No

RTC18b Please explain why you think / don't think that such uses should be restricted near schools and youth facilities

Better facilities should be developed on-site, otherwise local community provision is impacted.

RTC19a Do you think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis?

Yes

~~No~~

RTC19b Please explain why you think / don't think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis

n/a

Hempstead Valley District Centre

RTC8: Hempstead Valley District Centre

Hempstead Valley is different to the other traditional centres with high streets. The council recognises that it provides for local needs and therefore supports the modernisation and growth of this where supportive of this local function.

Further retail and leisure development, appropriate to the character and role of the centre will be supported, following a sequential or impact test, where it can be demonstrated that it does not undermine the viability of main town centres in Medway.

RTC20a Do you consider this is the appropriate approach to planning for Hempstead Valley shopping centre?

Yes

No

RTC20b Please explain why you consider / don't consider that this is an appropriate approach to planning for Hempstead Valley shopping centre

n/a

RTC21a Do you think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway?

Yes

No

RTC21b Please explain why you think / don't think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway

n/a

RTC22a Do you support a policy approach that seeks to achieve a balance of uses across all centres in Medway?

Yes

~~No~~

RTC22b Please explain why you support / don't support a policy approach that seeks to achieve a balance of uses across all centres in Medway

n/a

Dockside

RTC23a Do you support a policy approach that recognises the family leisure role of Dockside?

Yes

~~No~~

RTC23b Please explain why you support / don't support a policy approach that recognises the family leisure role of Dockside

n/a

RTC24 What do you think is the appropriate approach to further growth? Should policy only allow a small amount of new 'convenience' retail, or support a wider range of services and shops to develop its role as a local centre?

n/a

Medway Valley Leisure Park

Policy RTC9: Medway Valley Leisure Park

Medway Valley Leisure Park is a family leisure destination that attracts visitors and residents in the area.

The council's retail policy directs all leisure uses firstly to Medway's centres. Development proposals will be supported where enhancing current provision without requiring expansion beyond the designated boundary, subject to compliance with the council's retail policies:

- satisfying that no sequentially preferable sites were found;
- that the impact assessment has been satisfied where triggered

RTC25a Do you consider that this is an appropriate approach to planning for Medway Valley Leisure Park?

Yes

~~No~~

RTC25b Please explain why you consider / don't consider that this is an appropriate approach to planning for Medway Valley Leisure Park

n/a

RTC26a Do you think that there should be a specific policy to manage the development of Medway Valley Leisure Park, or if proposals should only be determined by use of wider retail policies?

There should be a specific policy

~~Proposals should be determined by use of wider retail policies~~

RTC26b Please explain your answer

The special nature of the area needs specific policies and any retail element would need to be resisted (unless a rail station alongside could be developed).

Healthy Sustainable Communities

Policy RTC10: Healthy sustainable communities

The council will support the provision of services and facilities, in accessible locations, to support the day-to-day activities of residents in a sustainable manner. Considerations of sustainability will include the offer (balance of retail, community uses and services), and accessibility - the mode of travel and distance.

The council recognises the importance of local services in villages as critical to sustainable rural communities.

RTC27a Do you agree with this proposed approach to sustainable communities?

Agree

~~Disagree~~

RTC27b Please explain why you agree or disagree with this proposed approach to sustainable communities

Local facilities, provision for outreach services and multi-use locations should be supported and encouraged to provide for those less able to travel (cost/disability) and to reduce car traffic into district and town centres.

RTC27c What alternative approaches would you suggest?

n/a

Local Centres and Shopping Parades

RTC11: Local Centres and Shopping Parades

Uses within a defined local centre or smaller shopping parades must be appropriate to the scale, character and role of the centre or parade, be compliant with the council's retail policies and include the following uses to support the core function:

- Convenience retail offer to provide top up shopping
- Community uses (such as hall, library, notice board)
- Services (such as hairdressers, cash machines)
- provide convenience for local communities (allowing various activities to be undertaken)

Proposals resulting in the loss of the core uses listed above will be permitted in local centres and shopping parades where in compliance with the council's retail policies:

- it is demonstrated that the loss is mitigated by similar uses of community value in close proximity;
- it is demonstrated that the proposed use would make a positive contribution to the vitality and viability and balance of uses in the centre and is of appropriate scale and character;
- the unit has remained vacant for at least 6 months and can be demonstrated that reasonable attempts have been made, without success, to let or sell the premises for a shop or community use.

RTC28a Do you consider that this is the appropriate approach to planning for small retail areas?

Yes

~~No~~

RTC28b Please explain why you consider / don't consider that this is the appropriate approach to planning for small retail areas

n/a

RTC28c Do you think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis?

~~Yes~~

No

RTC28d Please explain why you think / don't think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis

Local village services need to be supported and enhanced where possible and this should be an important policy rather than left to a case by case basis.

Retail Parks

Policy RTC12: Retail Parks

Retail proposals will be permitted in defined retail parks (Strood Retail Park, Horsted Park, Gillingham Retail Park) appropriate to their character where the following criteria are satisfied:

- Provision of suitable access, parking or parking arrangements;
- It is demonstrated that no locations in-centres are available where uses are typical of and more appropriate for a town centre location;
- It is demonstrated satisfaction of an impact assessment that there will be no impact on centres, with particular attention to vitality, viability, vibrancy and sustainability of the existing centres and their vulnerabilities
- No significant impact on the transport network and parking in the surrounding area
- Good public realm and linkage to the neighbouring centre is provided assisting in linked trips and increasing dwell time in the neighbouring centre.

An impact and sequential assessment for non-minor retail (above 2,500sqm) will be required to take account of the cumulative impact of recent significant proposals.

Where appropriate the council will require:

- conditions or legal agreements will be required to manage impact on centres, including a condition on the type and range of goods.
- Public realm works to facilitate better linkage with the centre.

RTC29a Do you consider that this is an effective approach to planning for retail parks?

Yes

No

RTC29b Please explain why you consider / don't consider that this is a effective approach to planning for retail parks

n/a

RTC29c Would you suggest alternative policies for planning of development in retail parks?

n/a

Natural Environment and Green Belt

This section highlights the requirement to protect Medway's natural assets, including designated wildlife habitats, parks and other green spaces. It also considers how we can improve our resilience to climate change, including flooding, and improve levels of air quality.

Q11 Thinking about the natural environment and greenbelt section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support conservation and enhancement of the environment in Medway?

The amount and quality of the designates environment assets are worthy of protection, and enhancement and should be publicised. However the non-designated environment will also contribute to and complement this. Appropriate sites should be considered for designation and support from developers and the community.

There are technical questions asked about the following natural environment and green belt policy approaches:-

- Sites of international importance for nature conservation
- Conservation and Enhancement of the Natural Environment
- Kent Downs Area of Outstanding Natural Beauty
- Landscape
- Securing strong Green Infrastructure
- Green Belt
- Flood and Water Management
- Air Quality

Sites of international importance for nature conservation

Policy NE 1: Sites of international importance for nature conservation

The estuaries and marshes of the Thames, Medway and Swale are designated Special Protection Areas (SPAs) and Ramsar sites in recognition of their international importance as wetland habitats. There is a Special Area of Conservation in the North Downs woodland near north Halling. These sites require the highest level of protection from development that could damage the features of the designated areas. No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site, alone or in combination with other plans or projects, as it would not be in accordance with the Habitat Regulations 2010 (as amended) and the aims and objectives of this emerging Local Plan.

The council will work in collaboration with local planning authorities in north Kent to contribute to the delivery of a strategic access management and monitoring scheme to address potential damage from population increases on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

Development within 6km of these areas designated as the Special Protection Areas and Ramsar sites that has the potential to generate additional visits to these coastal areas will be required to make a defined tariff contribution to a strategic package of measures agreed by the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) Project Board.

The council will consider the potential for adverse impacts on the Special Areas of Conservation arising from development, either alone or in combination with other plans and projects. If the assessment shows that there is a potential for adverse impacts, steps will be taken to restrict or mitigate development

NE1a Do you consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats?

Yes

~~No~~

NE1b Please explain why you consider / don't consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats

n/a

NE1c What alternative approaches would you recommend to secure the favourable condition of these areas?

n/a

Conservation and Enhancement of the Natural Environment

Policy NE2: Conservation and Enhancement of the Natural Environment

The council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy NE1, Medway includes Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites and a Marine Conservation Zone.

The council will promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.

NE2a Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment?

Yes

~~No~~

NE2b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing Medway's natural environment

NE2c What alternative approaches would you recommend to secure the favourable condition of these areas?

n/a

Kent Downs Area of Outstanding Natural Beauty

Policy NE3: Kent Downs Area of Outstanding Natural Beauty

Development proposals in the Kent Downs AONB and in the setting of the downs will be required to contribute to the conservation and enhancement of the natural beauty of this designated landscape.

Development must demonstrate that it has have regard to the Kent Downs Management Plan and associated policy guidance.

NE3a Do you consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB?

Yes

~~No~~

NE3b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB

n/a

NE3c What alternative approaches would you recommend to secure the components of natural beauty?

n/a

Landscape

Policy NE4: Landscape

The council attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, containing urban sprawl and separation of settlements.

An updated Medway Landscape Character Assessment and Green Infrastructure Framework will provide a basis for determining the acceptability of development proposals and areas and features that need to be protected and enhanced.

Development proposals will be required to demonstrate that they protect, strengthen and connect features of local landscapes.

NE4a Do you consider that this is an effective approach to landscape policy in Medway?

Yes

~~No~~

NE4b Please explain why you consider / don't consider that this is an effective approach to landscape policy in Medway

n/a

NE4c What alternative approaches would you recommend?

n/a

Securing strong Green Infrastructure

Policy NE5: Securing strong Green Infrastructure

The council will protect the network of green infrastructure across rural and urban Medway. The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a Special Protection Area, Ramsar site and/or Special Area of Conservation. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland.

The council will consider the need to protect the special features of Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves

Wider components of the green infrastructure network will be protected in line with the analysis and strategy set out in the emerging Green Infrastructure Framework. This will include open space assets, landscape buffers and green infrastructure zones.

New development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.

The council will expect development proposals to demonstrate that they are designed to be resilient to, and can adapt to the future impacts of climate change, in strengthening ecological networks.

The council will promote the extension of the green infrastructure network through setting criteria for the establishment and maintenance of Local Green Spaces.

Opportunities will be sought to promote and enhance the public rights of way network, including footpaths, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside.

NE5a Do you consider that this is an effective approach to securing effective and healthy green infrastructure in Medway?

Yes

~~No~~

NE5b Please explain why you consider / don't consider that this is an effective approach to securing effective and healthy green infrastructure in Medway

n/a

NE5c What alternative approaches would you recommend to secure effective and healthy green infrastructure in Medway?

n/a

Green Belt

Policy NE6: Green Belt

The council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.

The council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

NE6a Do you agree with the proposed policy for Green Belt?

Agree

~~Disagree~~

NE6b Please explain why you agree or disagree with the proposed policy for Green Belt

Supported, although there should be a review of the green belt boundary to the west of Medway, rather than the existing boundary that, mainly, follows the KCC/Gravesham/Medway boundary.

NE6c Do you consider that the exceptional circumstances exist to justify the review of the Green Belt boundary?

Yes

~~No~~

NE6d Please explain why you consider / don't consider that the exceptional circumstances exist to justify the review of the Green Belt boundary

Some areas on the Medway side of the Green Belt boundary are under pressure for development and should be considered for inclusion in the Green Belt to protect them and their impacts on the green belt.

NE6e Do you have suggestions for alternative approaches to Green Belt policy?

The boundary should follow landscape features rather than administrative boundaries.

Flood and Water Management

Policy NE7: Flood and Water Management

The Local Plan will seek to reduce flood risk, promote water efficiency measures, and protect and enhance water quality through the following mechanisms:

Flood Risk Management

- Ensuring that development has a positive or nil impact on flood risk management interests
- Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.
- Where development benefits from an existing or proposed flood infrastructure, the development should contribute towards the capital costs and/or maintenance of these defences over the lifetime of the development.

Sustainable Urban Drainage

Development should enable or replicate natural ground and surface water flows and decreased surface water runoff, via the use of Sustainable urban Drainage systems (SUDS), utilising green infrastructure where possible and as guided by relevant national (and/or local standards) and guidance.

Where SuDs are provided, arrangements must be put in place for their management and maintenance over their full lifetime.

Water Supply

Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and it does not put at risk the ability to maintain a public water supply.

Water Quality

All new development should have regard to the actions and objectives of appropriate River Basin Management Plans (in Medway, this is the Thames River Basin District) in striving to protect and improve the quality of water bodies in and adjacent to the district, as well as ecology, geomorphology, and water quantity. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary.

Adaptation to Climate Change

Development will be required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures. These include:

- Incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment.
- Minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDs in accordance with (SuDs policy above).
- Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading.

- Seeking opportunities to make space for water and develop new blue infrastructure to accommodate climate change.
- Where possible watercourses and wetland features will be adequately buffered from development commensurate with the designation and/or ecological value of those features so that they can be safeguarded and managed sustainably in perpetuity.
- Provision for buffering, mitigating and extending habitats and green corridors to ensure that wildlife populations are more resilient for a changing climate.

NE7a Do you agree with the proposed policy for flood and water management?

Agree

~~Disagree~~

NE7b Please explain why you agree or disagree with the proposed policy for flood and water management?

n/a

NE7c Do you have suggestions for alternative approaches for this policy area?

n/a

Air Quality

Policy NE 8: Air Quality

The council seeks to reduce exposure to areas of poor air quality, maintain areas of good air quality, and where possible improve air quality through restricting development or requiring acceptable and effective mitigation measures.

Proposed developments which have the potential to impact on air quality will be expected to be accompanied by air pollution impact assessments and mitigation measures, in accordance with local air quality guidance.

All proposals should take account of the Medway Council Air Quality Planning Guidance that sets out a screening checklist for major size development and proposed development within, or close to an AQMA. Depending on the scale of development, the council may require the submission of an Air Quality Assessment and/or an Emissions Mitigation Assessment.

The guidance also advocates mitigation measures for all development. Where mitigation is not integrated into a scheme, the council will require this through a planning condition(s). If on site mitigation is not possible, then the council may seek contribution to wider air quality mitigation measures through a planning obligation.

NE8a Do you agree with the proposed policy for air quality?

Agree

~~Disagree~~

NE8b Please explain why you agree or disagree with the proposed policy for air quality?

n/a

NE8c Do you have suggestions for alternative approaches for this policy area?

n/a

Built Environment

This section is concerned with the impact development has on its surroundings, especially in terms of historic character and appearance of areas. Buildings must be designed and delivered in a sustainable way; residential accommodation needs to be delivered to an appropriate density and to provide the space people need to live.

Q14 Thinking about the built environment section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support sustainable development and high quality design in Medway?

Quality of development, including well maintained public spaces, will be an important factor and it is important to discourage estates of identical housing, but variety in setting and design should be encouraged.

There are technical questions asked about the following built environment policy approaches:-

- Promoting High Quality Design
- Sustainable Design
- Housing Design
- Housing Density Approach
- Historic Environment and Managing development in the historic environment

Promoting High Quality Design

Policy BE1: Promoting High Quality Design

Development in Medway will be expected to be of high quality design that makes a positive contribution and respond appropriately to the character and appearance of its surroundings.

Proposals that incorporate high quality design and sustainability which demonstrably consider the following criteria will be permitted:

- The scale and form of development is appropriate to its surrounding context and is characteristic of Medway, or where appropriate new high quality character;
- The protection and possible enhancement of the historic environment and heritage assets;
- How the proposal relates to and/or reinforces the local distinctiveness and character through the use of high quality materials and local vernacular materials where appropriate; landscaping and building detailing;
- Working with the topography of the site and the incorporation of existing natural features;
- Responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site;
- Makes efficient use of land and ensures appropriate streetscapes;
- Good connectivity permeability that provides a clear user hierarchy for pedestrians, cycles, public transport and cars and that streets and spaces within new residential developments are not overly car dominated;
- Demonstration of provision and/or access to essential services and facilities;
- Respects the amenity of neighbouring uses through consideration of light levels, overshadowing, overlooking, loss of privacy, visual intrusion, appropriately designed car parking and ensuring minimal impact through noise, vibration, fumes or light pollution, and other relevant considerations;
- Creates a safe environment;
- Buildings that are appropriately flexible/adaptable and in appropriate circumstances transformable in the interests of sustainable life-long places;
- Provides for discreet waste and recycling bin storage and collection in accordance with the 'Medway Waste Management Requirements for New Developments' or other superseding guidance;
- High quality landscaping and areas of public realm that make use of or retaining features considered relevant/important by the Council and demonstrating linkages/contribution toward green infrastructure assets and networks;
- Achieves a transition from urban to rural where appropriate;
- Includes measures to mitigate and adapt to climate change.
- For development to demonstrate sustainability criteria, such as at least meeting a BREEAM standard of 'Very Good' for both energy efficiency and water efficiency.

The Council would expect compliance with the principles of nationally recognised standards, such as the Lifetime Homes and Building for Life (BfL12) Standards, so far as practicable, across all proposed new housing.

Proposals that fail to take the opportunity to incorporate high quality design will be resisted.

BE1a Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?

Yes

~~No~~

BE1b Please explain why you think that the proposed policy for high quality design do / don't represent the most appropriate approach for the Medway Local Plan

Essential policy (and protections need to be built into developments to lock these in)

BE1c What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

n/a

Sustainable Design

Policy BE2: Sustainable Design

All new development should aim for high standards of sustainable design and construction where feasible.

For residential development this will include meeting the higher national water efficiency standard of 110 litres/person/day. Where possible on large developments, a water efficiency standard of 90 litres/person/day will be sought.

BE2a Does the proposed policy for sustainable design represent the most appropriate approach for the Medway Local Plan?

Yes

No

BE2b Please explain why you think the proposed policy for sustainable design does / doesn't represent the most appropriate approach for the Medway Local Plan

There needs to be standards for energy use (including micro generation)

Waste disposal/recycling needs need to be provided for.

BE2c What do you consider would represent a sound alternative approach towards sustainable design in the Medway Local Plan?

n/a

Housing Design

Policy BE3: Housing Design

New housing developments should provide good living conditions for future occupants with high quality, robust, adaptable housing and functional spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities. All new accommodation must, in addition to the general design policy above:

- As a minimum meet the relevant nationally described internal space standard for each individual unit;
- As a minimum meet the Medway Housing Design Standard (MHDS) for external spaces including shared outdoor amenity space, shared access and circulation, cycle storage, refuse and recycling, management, visual privacy and private outdoor space, environmental comfort;
- Be arranged to ensure primary habitable rooms have an acceptable outlook and where possible receive direct sunlight;
- Be designed to minimise the disturbance to occupants from other land uses nearby and/or other sources of noise, vibration and pollution;
- Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms, unless there is justification for doing so on the basis of a significant design quality gain;
- Incorporate sufficient space for storage and clothes drying;
- Encourage the extensive use of trees as a positive contribution to air/environmental quality within housing developments;
- Be designed with a clear and particular attitude to place-making and distinctiveness within their context.

BE3a Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan?

Yes

~~No~~

BE3b Please explain why you think the proposed policy for housing design does / doesn't represent the most appropriate approach for the Medway Local Plan Provision for waste management and recycling needs to be added to the policy.

n/a

BE3c What do you consider would represent a sound alternative approach for housing design in the Medway Local Plan?

n/a

Housing Density Approach

Policy BE4: Housing Density Approach

The council will seek the efficient use of land and secure positive contributions to place-making through supporting developments at higher densities in appropriate locations, where it can be demonstrated that it does not create an unacceptable impact on the surrounding amenity and environment, and has the potential to boost the vibrancy and vitality of town centres.

Density should be reflective of the particularity in its surroundings and make the most effective and efficient use of land.

The council will consider varying attitudes to density on a case by case basis in developing masterplans and development briefs for regeneration sites.

Densities surrounding transport interchanges (railway stations and bus stations) will be expected to be higher to reflect the nature of these areas as transport hubs providing sustainable travel choices.

A range of house types should be considered regarding housing mix.

BE4a Does the proposed policy for housing density represent the most appropriate approach for the Medway Local Plan?

Yes (in general)

~~No~~

BE4b Please explain why you think the proposed policy for housing density does / doesn't represent the most appropriate approach for the Medway Local Plan

In general supported, although higher densities surrounding transport interchanges (railway station and bus stations) may be appropriate in the urban areas but will not to be practical in rural locations that do not have a wider range of retail and community facilities (noted that this idea was suggested by the Government)

BE4c Is there an alternative way to express optimum net residential density, e.g. habitable rooms per hectare?

n/a

BE4d What do you consider would represent a sound alternative approach for housing density in the Medway Local Plan?

n/a

Historic Environment and Managing development in the historic environment

Policy BE5: Historic Environment

To ensure the continued contribution that the historic environment has on Medway, the council will support the conservation and, where possible, the enhancement of the historic environment; including the heritage assets and their distinctiveness and characteristics. This will be achieved through:

- Restricting development that could have an unacceptable impact on a designated heritage asset and its setting;
- Ensuring that all new development contributes to local distinctiveness and character;
- Encouraging development that makes sensitive use of historic assets, particularly where they are under-used or redundant;
- Promoting the preservation of historic buildings considered to be 'at risk';
- Resisting demolition or destruction of heritage assets without substantial justification that clearly demonstrates that public benefit outweighs the harm or loss resulting from the demolition or destruction;
- Working with stakeholders on heritage initiatives, including bids for funding.

Policy BE6: Managing development in the historic environment

Development that impacts a heritage asset, or its setting, should achieve a high quality of design which will preserve or enhance the asset's historic or architectural character, appearance and setting.

Where a development impacts upon a heritage asset, or its setting, a proportionate heritage assessment must be submitted that assesses the level of impact.

The demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that all possible methods of preserving the asset have been investigated. In the circumstances where the loss of a heritage asset can be fully and robustly justified, the developer must make information about the heritage asset and its significance available to the council, along with making it possible for any materials and features to be salvaged.

Where a development involves, or has the potential to involve heritage assets with archaeological interest, applicants must submit a desk-based assessment, or where appropriate, a field evaluation.

BE5a Do the proposed policies for the historic environment represent the most appropriate approach for the Medway Local Plan?

Yes

~~No~~

BE5b Please explain why you think the proposed policies for the historic environment do / don't represent the most appropriate approach for the Medway Local Plan

n/a

BE5c What do you consider would represent a sound alternative approach towards planning for the historic environment in the Medway Local Plan?

n/a

Health and Communities

This section identifies the opportunities to enhance health and well-being as Medway grows. It focusses on healthcare facilities, supporting healthy lifestyles, and community facilities that support good quality of life.

Q17 Thinking about health and communities section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to help improve the quality of life for Medway's residents?

It is vital to provide local quality public open space and access to the countryside and riverside (both the Thames and Medwy) for walkers, cyclists and horse riders where practical. Gaps in connectivity need to be identified and joined with support of developer contributions.

Promoting Health and Wellbeing

Policy HC1: Promoting Health and Wellbeing

The council is committed to reducing health inequalities, increasing life expectancy and improving quality of life. It will support work to improve economic and social opportunities to tackle disadvantage across Medway by:

- Seeking opportunities to improve access to healthcare facilities and activities that promote physical and mental health and wellbeing.
- Requiring planning applications for major new residential developments where Environmental Impact Assessments are required, or developments identified by the council with the potential for negative health impacts, to be accompanied by a health impact assessment in line with the HUDU Rapid Health Impact Assessment Tool. The results of this assessment will be a material consideration in determining applications.
- Helping to tackle obesity, encourage physical activity and support mental wellbeing, through the provision of greenspaces, public realm and sports facilities accessible to all, creating and enhancing environments conducive to walking and cycling.
- Ensuring new development is sustainably located with access to local health facilities, and contributes to increasing capacity in line with the scale of proposed growth, and the council's policy for infrastructure contributions from developers.
- Increasing access to healthy food choices through extending opportunities for growing food such as allotments & community gardens; securing a range of local services; and a reduction in the proliferation of uses promoting unhealthy food options, including controls on A5 uses, in line with the council's Hot Food Takeaway Guidance Note.
- Promoting health and wellbeing through the design and layout of development in order to mitigate health conditions, such as dementia, and improve the accessibility of public places.
- Working alongside healthcare commissioners to plan for the future of acute care the council will seek to investigate the redevelopment of the present Medway Maritime Hospital site and if deemed necessary the relocation, or partial relocation of some services, to a new site within Medway.

HC1a Does the proposed policy for Health and Wellbeing represent the most appropriate approach to planning for health improvements in Medway?

Yes

No

HC1b Please explain why you think the proposed policy for Health and Wellbeing does / doesn't represent the most appropriate approach to planning for health improvements in Medway

n/a

HC2a Do you agree with the proposed threshold for HIAs?

Agree

Disagree

HC2b Please explain why you agree or disagree with the proposed threshold for HIAs

n/a

HC3a Do you agree with the council's proposed approach to managing Hot Food Takeaways?

Yes

~~No~~

HC3b Please explain why you agree or disagree with the council's proposed approach to managing Hot Food Takeaways

n/a

HC4 What do you consider would represent a sound alternative approach towards planning for health in the Medway Local Plan?

More publicity for what is already in place and identification of core gaps/improvements that will be supported, land uses that impact on them resisted and support through developer contributions sought for them.

Community Facilities

Policy HC2: Community Facilities

The council recognises the importance of community facilities and the need for an appropriate range of facilities as a key component of sustainable development. The council will seek to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors.

The council will support appropriate development that seeks to enhance community facilities, that does not have a negative impact on the surrounding amenity, historic and natural environment and transport networks.

The council will require provision to be made for community facilities in planning for new development. Large scale residential developments will be required to provide community facilities to meet the needs of new residents and seek opportunities to support integration with existing communities.

New community facilities should be located within or near the community they are intended to serve and should be appropriately located to limit the need to travel, being accessible to users by walking, cycling and public transport.

If the development is smaller scale and community facilities cannot be accommodated on site, a contribution will be sought to upgrade appropriate facilities off site, where it can be demonstrated that they are accessible to residents of the new development and that there is capacity for the increased population. All developments for over 10 homes will be required to contribute to upgrading community facilities in line with the council's policy on infrastructure contributions from developers.

There is a presumption against the loss of community facilities in rural and urban areas. Any proposal which would result in the loss of a community facility will not be permitted unless:

- an alternative community facility which meets similar local needs to at least the same extent is already available; and
- it can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character and vitality of the area; and
- in the case of commercial community facilities, it has been demonstrated that it is no longer economically viable and cannot be made so.

HC5a Does the proposed policy for Community Facilities represent the most appropriate approach to planning for this aspect of social needs in Medway?

Yes

~~No~~

HC5b Please explain why you think the proposed policy for Community Facilities does / doesn't represent the most appropriate approach to planning for this aspect of social needs in Medway

Community Facilities identified, protected and developer contributions towards their upkeep and development considered.

HC5c Do you agree with the proposed approach to addressing the presumption against loss of community facilities?

Agree

~~Disagree~~

HC5d Please explain why you agree or disagree with the proposed approach to addressing the presumption against loss of community facilities

n/a

HC5e What do you consider would represent a sound alternative approach towards planning for community facilities in the Medway Local Plan?

n/a

Infrastructure

Sufficient supporting infrastructure is vital for delivery of growth in Medway. This section focuses on means of securing funding for services and infrastructure from development and planning for education, communications technology, utilities and open space and sports facilities.

Q20

Thinking about the infrastructure section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to help improve Medway's infrastructure?

There appears to be a lack of a comprehensive list of infrastructure requirements or how they would be delivered. A sequential approach to delivering them before or early in the development process does need to be established. There also needs to be an identification of what cannot be delivered without a firm commitment of contingent infrastructure.

Infrastructure Planning and Delivery

Policy I1: Infrastructure Planning and Delivery

The council will seek the timely and effective delivery of infrastructure to support the local economy and meet the needs of Medway's communities. It will seek opportunities through working with government agencies, infrastructure bodies, developers and partner organisations to secure improvements to infrastructure in Medway.

It will produce and regularly review an Infrastructure Delivery Plan, identifying the range, cost and scope of infrastructure improvements required in Medway.

Development coming forward in Medway will be expected to contribute to the delivery of new and improved infrastructure, in line with the council's evidence base and policy for infrastructure contributions from developers.

Appropriate conditions will be attached planning permissions in order to make development acceptable and to support the provision of infrastructure.

The council will identify land for safeguarding for the provision of future infrastructure where required to meet specific development needs.

The council will engage with appropriate bodies on strategic infrastructure planning matters, meeting the Duty to Cooperate and where appropriate, and through Statements of Common Ground supporting plan making.

I1a Does the proposed policy for Infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway?

Yes

No

I1b Please explain why you think the proposed policy for Infrastructure planning and delivery does / doesn't represent the most appropriate approach to planning for infrastructure improvements in Medway

The Infrastructure Delivery Plan needs to be established BEFORE the level of development in the local plan can be assessed as Sustainable.

I1c What do you consider would represent a sound alternative approach towards planning for infrastructure in the Medway Local Plan?

n/a

Developer Contributions

Policy I2: Developer Contributions

To make development acceptable and enable the granting of planning permission, deficiencies in infrastructure arising from proposed development will be mitigated through developer contributions and conditions.

Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to provide or contribute towards the additional requirement to an agreed delivery programme. Where demonstrated to be necessary, the council will require that infrastructure is delivered ahead of the development being occupied.

Where developers consider that providing or contributing towards the infrastructure requirement would have serious implications for the viability of a development, the council will require an "open book" approach and, where necessary, will operate the policy flexibly.

I2a Does the proposed policy for developer contributions represent the most appropriate approach?

Yes

~~No~~

I2b Please explain why you think the proposed policy for developer contributions does / doesn't represent the most appropriate approach

Early delivery of infrastructure will be needed – before or early in the development.

I2c What do you consider would represent a sound alternative approach for developer contributions in the Medway Local Plan?

Parish councils should be involved in, and able to comment on, suggested developer contributions from the earliest to final agreement. Allowing some local input into proposals and to encourage contributions that will benefit their communities.

Education

Policy I3: Education

Early Years & School Provision

As Medway's population grows additional school places will be needed. New residential developments of significant scale will be expected to provide education facilities within their development in order to create sustainable communities. The requirements will be informed by the council's School Organisation Plan and Education Planning Team providing an assessment of the capacity and suitability of existing local schools to expand existing school provision.

All proposals for residential developments over 10 homes will be required to contribute to the funding of education services in accordance with the council's policy for infrastructure contributions from developers.

Proposals for the upgrading and expansion of existing schools and development of new schools in locations where additional provision is required will be supported subject to the criteria below. The council may use its Compulsory Purchase powers to facilitate the development of new schools where necessary.

Proposals for new education facilities should:

- have safe access by cycle and walking, public transport and car and incorporate a school travel plan;
- have safe drop-off and pick-up provision;
- provide outdoor facilities for sport and recreation; and
- avoid conflict with adjoining uses.

The Council supports consideration of opportunities for co-location of community services and shared use facilities on school sites. Educational facilities shall be encouraged to diversify to provide a wider range of services to benefit the whole community, such as sports facilities or community centres open to the public.

Further & Higher Education

The development and expansion of the Universities at Medway and Higher and Further Education Colleges will be supported within the 'learning quarter' at Chatham Maritime. Development of supporting uses where there is an identified link to the Universities and other research and development establishments will be supported where appropriate, and does not conflict with other policies in the plan.

I3a Does the proposed policy for Education represent the most appropriate approach for planning for education facilities?

Yes

No

I3b Please explain why you think the proposed policy for Education does / doesn't represent the most appropriate approach for planning for education facilities

Priority MUST be given to the local education needs first and only if not possible should it be used on alternative sites that are accessible by public transport from the location.

I3c What do you consider would represent a sound alternative approach for planning for education facilities in the Medway Local Plan?

n/a

Communications Technology

Policy I4: Communications Technology

In order for Medway to achieve its economic and social potential and maintain its status as a well-connected place to live and work, the Council will seek to develop and enhance the provision of broadband and telecommunications infrastructure coverage across Medway.

When considering proposals for the development of communications installations, regard will be given to:

- operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications apparatus;
- the potential for sharing existing masts, buildings and other structures; and
- the impact of the development on its surroundings with particular regard to the visual amenity, character or appearance of the surrounding area, and the proposed provision of landscaping.

Apparatus and associated structures sited on a building should be sited and designed in order to seek to minimise impact to the external appearance of the host building.

Development should not have an unacceptable effect on conservation areas or buildings of architectural or historic interest or areas of ecological interest or areas of landscape value or sites of archaeological importance.

Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.

Broadband

Proposals for new major employment and residential developments should include appropriate infrastructure, wired and wireless, to provide high speed internet access as part of the development.

I4a Does the proposed policy for Communications represent the most appropriate approach for the Local Plan?

Yes (in general)

~~No~~

I4b Please explain why you think that the proposed policy for Communications does / doesn't represent the most appropriate approach for the Local Plan

There is insufficient identification of needs where access to, and speed of, communication technology is still relatively poor and the need for suppliers to work together to provide improvements.

14c What do you consider would represent a sound alternative approach for planning for communications infrastructure in the Medway Local Plan?

n/a

Utilities

Policy I5: Utilities

Any new development will be supported by the requisite utilities infrastructure.

The council seeks early engagement with utilities providers in planning to meet the strategic growth needs of Medway as set out in the Local Plan, and which supports the timely and sustainable delivery of development.

Significant new development proposals will be assessed to determine the impact on the existing network (water, electricity and gas).

I5a Does the proposed policy for Utilities represent the most appropriate approach for the Local Plan?

Yes (although still local concern about practical delivery)

~~No~~

I5b Please explain why you think that the proposed policy for Utilities does / doesn't represent the most appropriate approach for the Local Plan

Residents are concerned about the practical delivery of this, often based on experience if recent developments.

I5c What do you consider would represent a sound alternative approach for planning for utilities infrastructure in the Medway Local Plan?

n/a

Open Space and Sports Facilities

Policy I6: Open Space and Sports Facilities

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Policy I7: New Open Space Provision

Provision for new open space will be in line with specifically identified needs, informed by a robust assessment. Strategic scale development will be required to provide new greenspaces to meet community needs, and contribute to the quality of placemaking

Policy I8: New Playing Pitches

New pitches will be provided in line with specifically identified needs, informed by a robust assessment.

Any new playing pitches should be constructed in line with Sport England guidance.

I6a Do the proposed policies for open spaces, sports facilities and playing pitches represent the most appropriate approach for the Local Plan?

Yes

~~No~~

I6b Please explain why you think that the proposed policies for open spaces, sports facilities and playing pitches do / don't represent the most appropriate approach for the Local Plan

Requirements will need to consider the implications of LOSS of facilities and support for local provision that requires financial support to remain viable and support future needs.

I6c What do you consider would represent a sound alternative approach for planning for open spaces, sports facilities and playing pitches in the Medway Local Plan?

n/a

Gillingham Football Club

Policy I9: Gillingham Football Club

The Council recognises the positive benefits of a successful football club to the Medway community and economy and will work positively with the club to find an appropriate site for the development of a new stadium with associated facilities that should include education, employment, sports and leisure, community use and hotel and conference facilities. Any proposals must demonstrate the sustainability of the site, include an Environmental Impact Assessment and demonstrate the benefit to Medway as a place to live, work, learn and visit.

I7a Do you agree with the proposed policy for Gillingham Football Club?

Agree

~~Disagree~~

I7b Please explain why you agree or disagree with the proposed policy for Gillingham Football Club

n/a

I7c Do you support the relocation of Gillingham Football Club to a new stadium in Medway?

Yes (where policy stated can be met)

~~No~~

I7d Please explain why you do / don't support the relocation of Gillingham Football Club to a new stadium in Medway

n/a

I7e Where do you consider would be a suitable location for a relocated stadium?

n/a

I8 What uses would you expect to see come forward as part of any new stadium proposals?

Community facilities

Transport

This section looks at planning for transport networks and facilities to ensure our transport systems are fit for the future; making links to development, supporting businesses and leisure activities.

Q23

Thinking about the transport section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support a sustainable and effective transport network in Medway?

Road congestion is already high in many locations and movement round the Medway Towns compromised (and even more so when there is disruption on major roads). Use of public transport (including rail) across the towns should be encouraged. New developments will need to provide support for residents to plan their options and support alternatives to car use (where practical).

Parking in villages is a growing issue and car parking provision is key, as well as provision for community parking. Increased parking requirements for developments in the rural areas should be considered.

Promoting sustainable transport

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

T1a Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?

Agree Importance of air quality, noise and traffic congestion are major requirements. Use of the railway within the Medway Towns (East/West and North/South) needs further publicity and encouragement)

~~Not Agreed~~

T1b Please explain why you agree or disagree that this approach offers an appropriate strategic approach to transport planning in Medway

n/a

T1c What do you consider would represent a sound alternative approach towards sustainable transport in the Medway Local Plan?

n/a

Integrating Land Use and Transport Planning

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 (replicated below for ease of reference).

Proposals which compromise this policy will be resisted.

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

The approach is based on four walking zones centred on rail stations:

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

* Indicative for Development Strategy Scenarios 2 and 3 only

	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

T2a Do you agree/disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway?

Agree

~~Disagree~~

T2b Please explain why you agree or disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway

T3a 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?

Agree (as long as a rural densification is developed alongside an urban area)

~~Disagree~~

T3b Please explain why you agree or disagree that densification is more likely to increase the viability of additional and/or improved public transport services

n/a

T4a 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?

Yes

No

T4b Please explain why you think it is appropriate / inappropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs

Practical benefits outside major cities does not appear to be proven.

T4c Continuing to think about the optimum densities set out in Table 11.1. For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare?

Yes

No

T4d Please explain why, for peripheral areas, you think it is appropriate / inappropriate to require a minimum of 35 dwellings per hectare?

Case by case required.

T4e Would it be appropriate to include Cuxton and Halling stations in Table 11.1?

Yes

No

T4f Please explain why you think it would be appropriate / inappropriate to include Cuxton and Halling stations in Table 11.1

Rural stations do not have the range of services and facilities that support an increased density.

T5 What do you consider would represent a sound alternative approach towards the integration of land use and transport planning in Medway?

n/a

Hoo Peninsula rail connection

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.

T6a Do you support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight?

Yes (Strongly supported)

~~No~~

T6b Please explain why you support / do not support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight

Road access into town and to the major road network is already congested, without future developments. Vehicles need to be taken off the road where practical.

T6c The council welcomes responses indicating areas of land to be safeguarded. This information could be considered in a business case, subject to funding. Do you have any areas you would like to suggest:-

B2000 between Cliffe and Cliffe Woods for a future halt/station.

Land around Kingsnorth for a passenger terminal station and transport interchange for the Hoo Peninsula.

T6d What alternative approaches would you suggest?

Start with basic service (2/3 coach battery/hybrid to Medway Towns (Strood Platform 3)) and then grow with services towards London as demand grows (when/if Crossrail comes to Gravesend and other Gravesend services can be extended). Initial costs will have to be met, in the main, by developer contributions so a relatively low cost solution should be implemented as quickly as possible).

Rochester Airport

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.

T7a Do you agree with the proposed policy for aviation in Medway?

Agree

~~Disagree~~

T7b Please explain why you agree or disagree with the proposed policy for aviation in Medway

On the basis of impacts miigated.

T7c What alternative approach would you propose for planning policy for aviation in Medway?

n/a

Riverside Infrastructure

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.

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.

T8a Do you agree with the proposed policy for riverside infrastructure in Medway?

Agree

~~Disagree~~

T8b Please explain why you agree or disagree with the proposed policy for riverside infrastructure in Medway

n/a

T9a Do you consider the flexible approach to Chatham Docks to be appropriate?

Yes

~~No~~

T9b Please explain why you consider / don't consider the flexible approach to Chatham Docks to be appropriate

n/a

T10 What alternative approach would you propose for planning policy for riverside infrastructure in Medway?

n/a

Medway Riverside Path

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.

T11a Do you agree with the proposed policy for a riverside path in Medway?

Agree

Disagree

T11b Please explain why you agree or disagree with the proposed policy for a riverside path in Medway

But do not forget the River Thames!

T11c What alternative approach would you propose for planning policy in Medway?

n/a

Marinas and moorings

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.

T12a Do you agree with the proposed policy for marinas and moorings in Medway?

Agree

~~Disagree~~

T12b Please explain why you agree or disagree with the proposed policy for marinas and moorings in Medway

n/a

T12c What alternative approach would you propose?

n/a

Urban Logistics

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.

T13a Do you agree with the proposed policy for planning for logistics in Medway?

Agree

Disagree

T13b Please explain why you agree or disagree with the proposed policy for planning for logistics in Medway

It is not clear how the local road infrastructure would support this level of activity. Use of the railway, for inward and major outward delivery should be encouraged/enforced.

T13c 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. Please make any suggestions below:-

See above

T13d What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?

n/a

Connectivity and Permeability

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.

T14a Do you agree with the proposed policy for planning for connectivity in Medway?

Agree

~~Disagree~~

T14b Please explain why you agree or disagree with the proposed policy for planning for connectivity in Medway

n/a

T14c What alternative approach would you propose?

n/a

Vehicle Parking, Cycle parking and storage and Managing the transport impact of development

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

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.

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.

T15a Do you agree with the proposed policy approaches for managing the transport impacts of development and provision for parking?

Agree

Disagree

T15b Please explain why you agree or disagree with the proposed policy approaches for managing the transport impacts of development and provision for parking

Vehicle Parking – further development of this policy is required. There may be a need to exceed parking provision standards in some areas (especially rural villages where vehicle ownership is much higher than urban areas) and parking is causing problems for through traffic, especially emergency vehicles. There is also a growth in commercial vehicles operating from residential properties or ‘brought home’ to be parked up between jobs or return to work.

Support for Cycle Parking and Storage

Support policy for transport plans – but to include references to the Kent Community Rail Partnership for developments alongside the Medway Valley Line or any Hoo Peninsula Passenger Rail.

Support policy for vehicle crossovers.

The amount of development proposed (housing, economic development, public open space etc.) will mean large scale development until 2035 (and probably longer). During this there is likely to be considerable vehicle movement adding to the existing pressure on local roads and the environment (noise, dust, air quality and lighting). There will be a need for developers to conform to quality standards of development (although voluntary, should be enforced by planning condition where appropriate.

There should also be a body established by developers, the council or a private/public sector body to establish and run a local exchange for building materials (plant, equipment, materials and soils etc.) so that these items can be shared/re-allocated/re-used rather than sent to land fill or transported in and out of the area unnecessarily when needed locally – ultimate disposal if not used would remain with the generator of the material/item.

T15c 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?

Yes

~~No~~

T15d Please explain why you think it would / wouldn't be prudent to seek to manage this through planning policy

Implications and support for this may be identified early in any new development.

T15e What alternative approaches would you propose for policy in the new Medway Local Plan

n/a

Minerals, Waste and Energy

This section looks at how we need to plan for the sustainable supply of minerals, including wharves for importation of materials, how we plan for the management of waste and it also looks at planning for energy, renewables and supporting low carbon development.

Thinking about the minerals, waste and energy section of the Development Strategy, please answer the following question.

Q26 When developing the Local Plan what things do you think the council should consider to manage minerals, waste and energy within Medway whilst supporting regional and national demand?

n/a

There are technical questions asked about the following infrastructure policy approaches:-

- Minerals Supply, Land-won extraction of sands and gravels, Land-won minerals: chalk and clay, Minerals wharves and railheads and Minerals infrastructure
- Waste Management, New Waste Management Facilities, Existing Waste Management Facilities, Waste disposal to land and Waste Water Treatment Works
- Energy and Renewables and Low Carbon Development

Minerals

Policy MWE1: Minerals Supply

The council will plan for a steady and adequate supply of minerals by:

- Maintaining a 7-year landbank of permitted sand and gravel reserves;
- Supporting regional consideration and planning of minerals through its membership of the South East England Aggregates Working Party.

Policy MWE2: Land-won extraction of sands and gravels

Proposals for the extraction of sand and gravel will be permitted within the identified areas of search when:

- There is a proven need for the minerals to be extracted at that time in order for the council to maintain a 7-year landbank;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
 - o Exceptions will be considered when there are demonstrable overriding benefits that justify the development.

Policy MWE3: Land-won minerals: chalk and clay

Proposals for the extraction of land-won minerals will be permitted outside of the identified areas of search when:

- There is no adverse impact on sites designated for environmental or heritage significance;
- There is a proven need for the minerals to be extracted at that time;
- The site is not allocated for another use in the Local Plan;
- The site is located in an area that can accommodate the proposed development;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
- Exceptions will be considered when there are demonstrable overriding benefits that justify the development.

Policy MWE4: Minerals wharves and railheads

The identified minerals importation and distribution facilities that currently benefit from permanent planning permission will be safeguarded from development that would prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;

- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the importation or distribution facility can be made elsewhere in Medway.

Policy MWE5: Minerals infrastructure

Facilities for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material in Medway will be safeguarded from development that will prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;
- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the facility can be made elsewhere in Medway.

MWE1a Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway?

Yes

~~No~~

MWE1b Please explain why you think that the proposed policies MWE1-MWE5 do / don't represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway

n/a

MWE1c What do you consider would represent a sound alternative strategy for minerals planning in the Medway Local Plan?

n/a

Waste

Policy MWE6: Waste Management

All development should seek to minimise the generation of waste, having regard to the Waste Hierarchy.

The council will promote sustainable waste management within all new developments, ensuring that there is an appropriate provision for the separation, storage and collection of waste.

In order to help reduce waste through the development process, planning applications for major or strategic development¹⁹⁴ or those where significant levels of waste will be generated must include a waste management audit. The audit will be expected to show how waste is to be managed both through the construction period, including demolition and remediation, if appropriate; and that effective means of managing waste arising from the development are provided.

The council will continue to actively support regional consideration and the planning of waste management through its membership of the South East Waste Planning Advisory Group (SEWPAG), and with neighbouring Waste Planning Authorities on cross-border waste management issues and opportunities.

Policy MWE7: New Waste Management Facilities

The council will strive to maintain net self-sufficiency across each of the waste streams through permitting facilities for the reuse, recycling, treatment and transfer of waste materials, subject to their being of an appropriate environmental standard. Medway City Estate and Kingsnorth and, at a lesser scale, the existing established industrial estates are the preferred locations for such activities. The development of waste facilities outside of identified industrial areas will only be permitted where:

- There is no adverse impact on sites designated for environmental or heritage significance;
- The site is not allocated for other uses in the Local Plan;
- The site is located in an area that can accommodate the proposed development and does not have an unacceptable impact on amenity, the local environment and transport networks; and
- The site comprises brownfield land;
 - o Proposals on green field land will only be permitted where no alternative suitable brownfield sites can be identified.

Special consideration will be given to the development of waste management within existing established industrial estates that utilise existing rail facilities or the river Medway as a means of transportation.

Policy MWE8: Existing Waste Management Facilities

Existing waste management facilities that currently benefit from permanent planning permission will be safeguarded from development for non-waste management uses, unless;

- The proposed site is allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;

- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the waste management facility can be made elsewhere in Medway.

Policy MWE9: Waste disposal to land

Proposals for the creation of void space or land-raising to facilitate a disposal facility for non-inert or hazardous waste located within the areas referred to as the Disposal to Land Resource Areas on the Hoo Peninsula and Isle of Grain will be assessed against the following criteria:

- Impact of development on rural landscape character and local distinctiveness;
- Other local impacts, including on residential amenity, being acceptable;
- The site being well related to the primary road network and with suitable site access and egress arrangements, and that impacts on the transport network are acceptable. Opportunities for transport by rail and water are encouraged;
- It being clearly demonstrated that the material to be deposited cannot be reasonably disposed of in any other way (that is that they are irreducible residues);
- That the facility will handle a high proportion of such waste arising within Medway and the immediately surrounding area to ensure a sustainable pattern of disposal;
- Unless a specific needs case can be demonstrated, that wastes to be deposited do not involve a road haulage distance of more than 50 miles;
- That all the reasonable requirements of the Environment Agency can be satisfied; and
- There being a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site.

Policy MWE10: Waste Water Treatment Works

Proposals for the development of new, or the extension to existing waste water treatment works, sewage treatment and disposal facilities will be permitted in sustainable locations where there is a proven need for the proposed facility, and development does not conflict with the need to safeguard the environment and does not create unacceptable impacts on amenity.

MWE2a Do the proposed policies MWE6-MWE10 represent the most sustainable approach to managing Medway's waste?

Yes

~~No~~

MWE2b Please explain why you think that proposed policies MWE6-MWE10 do / don't represent the most sustainable approach to managing Medway's waste

n/a

MWE2c What do you consider would represent a sound alternative strategy for waste management in the Medway Local Plan?

n/a

Energy

Policy MWE11: Energy and Renewables

Proposals for energy developments, including any ancillary building or infrastructure, will be supported unless:

- the impact would compromise statutory designations where national planning policy restricts development;
- their scale, form, design, material and cumulative impacts is unacceptable to the local landscape or built environment, or loss of the best and most versatile agricultural land;
- any adverse impacts on the local community, economy, biodiversity or historic interests cannot be mitigated;

The council will consider the designation of defined areas for renewable energy technologies through a Local Landscape Character Assessment.

The council will actively promote the development of local supply chains and other associated employment opportunities.

The council will explore opportunities for Combined Heat and Power Systems connected to district heating networks.

Policy MWE12: Low Carbon Development

This policy seeks to implement an energy hierarchy by achieving energy efficiency first, before requiring the implementation of other forms of renewable energy generation on a larger scale.

Developers are required to follow the hierarchical approach set out below in achieving the energy and carbon dioxide emission requirements of the Building Regulations for all new residential development. New non-residential development is encouraged to follow the same approach.

1. To improve energy efficiency through thermal and fabric performance improvement measures.
2. Provide on-site renewable energy generation or on-site connected heating, or Combined Heat and Power (CHP) technologies, or Combined Cooling, Heat and Power (CCHP) systems.
3. The remainder of the carbon reduction targets to meet the Building Regulations targets should be met through suitable additional measures.

Developers are encouraged to meet higher standards than those required nationally, and pursue additional low carbon or renewable energy generation measures where practicable.

Compliance with this policy approach is required to be demonstrated through design and access statements submitted with a planning application.

MWE3a Do the proposed policies MWE11- MWE12 represent the most sustainable approach to planning for energy in Medway?

Yes

~~No~~

MWE3b Please explain why you think that proposed policies MWE11- MWE12 do / don't represent the most sustainable approach to planning for energy in Medway

n/a

MWE3c What do you consider would represent a sound alternative strategy for energy in the Medway Local Plan?

n/a

The council is preparing a new Local Plan to set out how the area will develop to 2035. We are now consulting local people on how the plan will support the council's vision of 'growth for all'.

We want to hear from residents, businesses, local organisations, community and interest groups to help create the best possible version of Medway. So it is important you take this opportunity to have your say on how Medway should grow.

The consultation period is from Friday, 16 March 2018 until 5pm on Friday, 11 May 2018.

The plan will ensure the area has enough new homes, jobs, and infrastructure to support the expected population growth. It will also focus on preserving Medway's environment and heritage.

Our challenge is to do this in a way that achieves sustainable growth. We need to balance this with the need for homes, jobs and services while conserving our natural and historic environments.

Comprehensive details of how the area might look in coming years can be seen in the Development Strategy consultation document. An introduction to the council's proposed approach to growth in Medway has been published and summarises the four scenarios for how the area could develop.

How can I find out more?

The Development Strategy consultation document is not just about land for housing. The main Development Strategy document is a detailed technical report that sets out the issues Medway faces and draft policies on how we could best address them. It looks at a number of important themes:

- Housing
- Employment
- Retail and centres
- Natural Environment and Green Belt
- Built environment
- Health and communities
- Infrastructure
- Transport
- Minerals, waste and energy

You can find out more:-

Online

You can view the Development Strategy, supporting documents and new, detailed maps of all four scenarios on the council's website at: medway.gov.uk/futuremedway

We have also produced some further summary information about what the development proposals may mean for regeneration, a rural town on the Hoo Peninsula and wider growth in suburban and rural areas.

Links to each section of the Development Strategy are included throughout this consultation form.

Printed copies

You can view a copy of the main report at the reception desk of the council offices at Gun Wharf, public libraries and community hubs across Medway. You can find details of the locations and opening hours of these buildings at: medway.gov.uk. You can also use the public libraries to view the additional information on the council's website.

How can I make my views known?

If you would like to make comments on the proposals in the Development Strategy document, you must submit them in writing by 5pm on Friday 11 May 2018. You can respond in the following ways:

Online: Using this form

The consultation form is designed to allow you to make comments about each of the different things the council has to consider when developing the Local Plan.

For each section there is the opportunity to give your views, and if you wish, to answer the questions that are asked throughout the technical document.

Alternatively you can submit your response

By email: futuremedway@medway.gov.uk

By Post to:

Planning Policy Team

Regeneration, Culture, Environment and Transformation

Medway Council

Gun Wharf

Dock Road

Chatham

Kent ME4 4TR

Your comments and contact details

We will record all written comments as part of the process of preparing the new Local Plan. At the close of the consultation we will review all comments received, look at the key issues raised, and take these into account in working to the next stage of the draft.

All comments will be published on our website - personal details such as addresses of individuals will be removed. We will keep your details on our records and keep you informed about further work on the Local Plan.

We will not share your details, or use them for any other purposes. The responses and contact details will be kept as part of the formal record of the preparation of the Local Plan. This will be for a minimum of five years.

Medway Council will keep the information provided above as confidential. Access to, retention and disposal of this information will be strictly in accordance with data protection requirements. Your personal data will be processed in accordance with Medway Council's Data Protection notice.

If you do not wish to be informed about the work on the Medway Local Plan, please tick here.

Full Name **Chris Fribbins (Clerk, Cliffe and Cliffe Woods Parish Council)**

Email Address **clerk@cliffeandcliffewoods-pc.gov.uk**

Address

Type of Consultee - please select the option that best describes you

Parish Council

Planning positively for Medway's successful future

Growth for all

The council's vision is to achieve 'growth for all' to make Medway an excellent place to live, work, learn and visit.

Medway's population has grown by more than 10,000 people since 2012 to 278,542 in 2016. By 2035 our population could be more than 330,000 people. If we do not plan properly for our growing and changing population there will be greater pressures on:

- Housing - the council knows Medway needs 29,500 new homes by 2035. A government formula may mean this figure goes up to 37,000. We need to identify a housing target for the plan.
- Local services, such as schools and health centres.
- Growth in the local economy- this will be held back and if we do not plan for growth, development will happen on a piecemeal basis.

We also need to promote development that will help to:

- Boost our local economy
- Improve the health of residents
- Address decline in town centres
- Provide new services and infrastructure
- Create a flourishing and attractive environment

Planning positively for Medway's successful future

Medway is a complex and diverse area. A large urban area has grown up between the river and the Kent Downs. There are wide tracts of remote countryside, strategic industrial, energy and transport facilities and good quality farmland. A third of land is of international or national importance for wildlife.

The Local Plan sets out a vision for Medway in 2035 as a leading university waterfront city of 330,000 people, noted for its revitalised urban centres and its stunning natural and historic assets and countryside. It sets ambitions for:

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

You can find out more in the Vision and Strategic Objectives for Medway in 2035 section of the consultation document.

Development strategy

The development strategy section outlines the approach taken to planning for the area's growth, across urban, suburban and rural areas, and sets out four alternative approaches to how Medway could grow to meet the aims of the Local Plan. The council has no preferred option at this stage.

We are approaching growth plans in the following way:-

1. Promoting the regeneration of urban waterfront and town centres

The Local Plan vision places regeneration at the heart of Medway's development strategy.

Regeneration of existing areas is a priority of the Medway strategy for growth. We continue to transform our urban waterfront and bring forward rejuvenation and improvements in some of the town centres.

The redevelopment of underused sites along the urban waterfronts and centres makes the best use of brownfield land and provides opportunities for homes, jobs, services, community and leisure activities and new public spaces.

The council has set out its ambitions for regeneration in our vision document Medway 2035, which promotes a successful economy and growth with benefits for all. You can find this document online

As well as the regeneration of the urban waterfront sites, the plan also promotes opportunities for new development in parts of town centres. This could include new housing, boosting the number of people living in the centres and supporting local shops, services and restaurants. New businesses could be attracted to sites near the town centres.

2. A rural town on the Hoo Peninsula

Local people have told us that they are concerned about pressures on infrastructure. They want to see new housing supported by upgrades to local services and facilities. The council has responded by looking at what growth options give the best scope for improvements in infrastructure. We consider that focusing growth into a small rural town around Hoo St Werburgh would bring these opportunities for new infrastructure. Development of new employment sites as part of the rural town, and nearby sites at Kingsnorth, could help to boost the area's economy.

As well as a mix of housing types, a rural town could provide new country parks, schools, leisure centre, health facilities, new jobs and shops. New transport links could include the opening of a passenger rail service on the Hoo Peninsula. The rural location demands the greatest care in planning for growth to respect the special qualities of the environment and to keep a rural character.

3. Wider growth

A mix of smaller sites in suburban areas, around Rainham and Capstone and other villages, are proposed to provide a range of housing sites. These are of a smaller scale, reflecting difficulties in addressing infrastructure and environmental issues.

The council wants to avoid unchecked growth of the suburbs, which could undermine our ambitions to revitalise town centres and lead to more car based travel. We will also continue to resist inappropriate development in the Green Belt to the west of Medway.

Development strategy

Development scenarios

Each of the four scenarios has a map showing potential developments, you can see where these potential developments are by clicking the link in the descriptions below. The four scenarios all share these common elements.

Homes will be supported by:

- New and expanded schools
- Health facilities
- Leisure and community centres
- Transport upgrades
- Riverside walks
- Parks and play areas

The growth around Hoo would include two new country parks, employment areas, new shops and services, and transport links and services.

Scenario 1: Meeting the housing need of 29,500 homes

Scenario 1 is based on the council's analysis of the number of homes needed to support the area's population growth and change up to 2035. The strategy seeks to firstly direct growth to brownfield regeneration sites. About half of the growth would take place on urban sites where we can make the best use of land. A rural town and some village expansions on the Hoo Peninsula would provide for the improvements in infrastructure to support a wide mix of development. These areas could meet over a third of the growth needed. About a sixth of development would be spread across sites in suburban areas and smaller villages.

It does not involve development on land designated for its environmental importance at Lodge Hill. There would be some buffers of undeveloped land next to these protected areas.

This scenario could deliver about 16,500 new homes on the sites identified in the map. Given the existing 'pipeline' of development, and windfall sites not identified on specific sites, a total of 29,950 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 9,318 homes

Suburban sites: 4,528 homes

Scenario 2: Investment in infrastructure to unlock growth

Scenario 2 - Growth of a rural town on the Hoo Peninsula is dependent on new infrastructure and services. The council is working to secure major funding to upgrade transport and other services in the area. This includes the potential use of the Grain freight railway line on the Hoo Peninsula for passenger services. If we were successful in getting a new train service for the area, this could open up opportunities for new jobs and different approaches to design. We could develop at higher densities in specific locations that are well connected to a new station.

The higher and faster rates of housing delivery in this scenario would reduce the need to release land in some suburban locations. Over 40% of growth would be on the Hoo Peninsula. In comparison with Scenario 1, this would remove land in the Capstone Valley and to the north of Rainham from proposed development allocations.

The higher density rates would boost the number of homes that could be built in the area. This scenario could deliver about 17,500 new homes on the sites identified in the map above. Given the existing 'pipeline' of development and windfall sites, a total of about 31,000 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 11,750 homes

Suburban sites: 3,179 homes

Scenario 3: Meeting government's target of local housing need of 37,000 homes

Scenario 3 - The council has looked at options for how we could reach such a large increase in the land needed for housing to meet the government's target. However, the Local Plan is not just about housing but balanced growth. To find more land for housing we would need to see more of the potential regeneration sites come forward for development. This could include the loss of some employment sites for housing developments. We would also need to release more land in suburban locations, such as to the east of Rainham, and this would make up about a fifth of total growth.

This scenario could deliver about 22,500 new homes on the sites identified in the map above. Given the existing 'pipeline' of development and windfall sites, a total of 35,960 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 14,194 homes

Hoo Peninsula: 12,162 homes

Suburban sites: 6,276 homes

This scenario involves much higher levels of growth in all areas, and would need careful planning and substantial funding of service improvements to deliver sustainable development.

Scenario 4: Consideration of development within Lodge Hill SSSI

Scenario 4 -Previous stages of consultation on the Medway Local Plan referred to the possible use of land at Lodge Hill for a new settlement on the Hoo Peninsula. This involved development on land designated as Site of Special Scientific Interest (SSSI) for its environmental importance. The proposal related to a planning application, which has now been withdrawn. Homes England, the government's regeneration agency, now owns the site. It is preparing a new planning application for a smaller scheme for up to 2000 homes with supporting services. Some of the development would involve building on the SSSI land. Homes England is proposing a scheme where the majority of land would be protected from development. This would include land managed for nature conservation and some new public open space. Development would provide homes as well as the funding to remove unexploded ordnance and manage other land for nature conservation.

The additional land at Lodge Hill would remove the need to allocate some land for development in Stoke and in the Capstone Valley.

This scenario could deliver around 17,000 new homes on the sites identified in the map above. Given the existing 'pipeline' of development including windfall sites, a total of 30,500 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 10,357 homes

Suburban sites: 4,108 homes

Development strategy

Q1 Thinking about our approach, the scenarios and the development strategy section, please answer the following question.

When developing the Local Plan what things do you think the council should consider about the scale of the development needed to support Medway's growth and provide sustainable development?

While accepting the existing growth in population of the Medway Towns there appears to be insufficient consideration of the existing issues for local residents or the pressures that this would bring to the area. There has been a focus on new housing figures by government without an assessment of the local constraints and issues that need to be addressed.

Although there are references to infrastructure issues, there is little detail regarding the specific requirements and which are required for developing relevant sites, or the constraints that this would place on the number of units that could be developed. Masterplan development is required before any assessment can be made on the sustainability of these local plan site proposals. In particular an indicative masterplan of changing Hoo St Werburgh from a large village to a small town is required as this is present in all the scenarios. Connectivity with other villages on the Hoo peninsula is also required as much of the infrastructure is already shared and will be more reliant if these developments proceed.

We have a major concern about the deliverability of the housing demands and the related infrastructure. The number of housing units across the plan area per year is more than the area has ever managed to deliver in recent decades. The government have also indicated the possibility of 'sanctions' if this rate is not achieved and there is concern that speeding this up may jeopardise the delivery of necessary core infrastructure, through reduced requirements on new developments to increase the rate of delivery.

Recent developments (outside of the 2013 village boundaries) approved on the Hoo Peninsula (outside the 2013 Local Plan village boundaries) are missing from consultation maps and the impact of these does need to be considered alongside the new proposals. There are also no indicative figures on the number of housing units for each of the sites proposed.

We are also concerned to see no land allocation for major health facilities on the west side of the River Medway. The previous consultation stage mentioned this as a need for the area – access to facilities at Medway and Darenth Valley Hospitals is already an issue during the day for both patients and visitors from the Hoo Peninsula.

Without a response to these issues, there is difficulty in assessing the sustainability of the plan and the impact on current and future residents is likely to be negatively affected.

There are technical questions asked about the following development strategy policy approaches:-

- Sustainable Development
- Spatial Development Strategy

Development strategy

Policy DS1: Sustainable Development

The purpose of planning is to achieve sustainable development. When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Planning applications that are in conformity with the Medway Local Plan (and where applicable, with policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date, the council will grant permission, unless material considerations indicate otherwise, and considering whether:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in the NPPF indicate that development should be restricted.

Policy DS2: Spatial Development Strategy

The council will seek to meet the development needs for homes, employment and retail land, infrastructure and services, as determined by the evidence base set out in the Medway Local Plan, whilst respecting the need to conserve and enhance the natural and built environment.

The development strategy for Medway prioritises regeneration, making the best use of underused and previously developed land and directing investment to urban waterfront and centre opportunity areas. The council will encourage sustainable development in appropriate urban regeneration sites to deliver housing, employment, retail and community uses, establishing a quality and accessible public realm, including the extension of a riverside walk. Chatham will provide the focus for new retail and community facilities. Appropriate opportunities to capitalise upon the learning quarter at Chatham Maritime will be positively considered.

Outside of the regeneration areas, the council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting and supported by significant infrastructure investments. The development will be in accordance with a masterplan, to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to a range of services and infrastructure.

The council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.

Strategic green infrastructure zones throughout urban and rural Medway will promote a natural capital approach, and secure benefits for nature and people and provide separation of settlements.

DS1a Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

Yes

No

DS1b Please explain why you think proposed spatial development strategy does / doesn't represent the most sustainable approach to managing Medway's growth

By failing to identify the specific infrastructure interventions that would be required to support a small town at Hoo St Werburgh and their delivery, there cannot be any assurance that the proposed scale of development is sustainable.

There are already concerns about the capacity road system (A228/Four Elms Roundabout/A289 Bypass/Frindsbury Hill) to support the housing that has already been approved and the additional housing numbers (although site allocations have to be assumed as they are not published) as well as commercial developments that are already taking place and assumed as part of the plan).

Health facilities are under pressure (and access to hospitals in Gillingham or Dartford) will be compromised by this scale of development. Although buildings can be provided there is little confidence that the required skilled staff can be recruited to run them. In fact, there are examples of some medical facilities that are underused because of this already.

Residents do also have concerns about the provision of water (and sewage), electricity, gas and mobile phone/broadband services already.

DS1c What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

A more detailed infrastructure plan is required (and a master plan of the Hoo St Werburgh small town with connections to the other local villages).

Town Centre sites should be re-assessed to see if further housing capacity can be encouraged (in particular with reference to the drop in retail premises and the existing infrastructure and need to support and grow community facilities for the existing population.

Housing

This section provides details of Medway's housing need, with a main Housing Delivery policy and nine supporting housing policies to help get the right mix of housing required in Medway to accommodate a growing population with diverse needs.

Q2 Thinking about the Housing section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's housing needs?

Infrastructure – especially highways peak capacity issues at the A228/A289 roundabouts (Sans Pareil and Four Elms, Health and specific Education facilities need to be addressed before the level of housing can be assessed as sustainable.

There are technical questions asked about the following housing policy approaches:-

- Housing Delivery
- Housing Mix
- Affordable Housing
- Supported Housing, Nursing Homes and Older Persons Accommodation
- Student Accommodation
- Mobile Home Parks
- Houseboats
- Houses of Multiple Occupation (HMOs)
- Self-build and Custom Housebuilding
- Gypsy, Traveller and Travelling Showpersons

Housing Delivery

Policy H1: Housing Delivery

The council will determine a housing target for the Medway Local Plan, responding to the latest relevant information, in preparing its draft Local Plan.

The council will seek to provide a supply of land 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.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.

Development of a strategic allocation for a rural town on the Hoo Peninsula will be in accordance with the council's development framework for Hoo.

H1a Does the proposed policy for housing delivery represent a sound approach?

~~Yes~~

No

H1b Please explain why you do / don't think the proposed policy for housing delivery represent a sound approach

The policy cannot be fully assessed without the Masterplans, coordination of infrastructure and service provision. The idea of a small town at Hoo St Werburgh was part of the 2017 consultation on the Development Strategy but the provision of services appears to have regressed with no land use allocation for a significant health facility on the western side of the River Medway, or schools (both which would have significant additional pressures on the local road network). Allocation of specific sites (as proposed in this consultation) is flawed without more detail on the infrastructure interventions.

The consultation is also not up to date with significant, recent, housing developments included in the consultation and already creating infrastructure demands and other pressures (especially around Hoo and Chattenden)

The deliverability of these housing numbers also needs further investigation. If delivery falls behind the level required to achieve the numbers indicated in the plan there will be more pressure to develop faster (and cheaper) and infrastructure and community facilities may be dropped or down-graded.

H1c Would you suggest an alternative approach?

A more detailed investigation into the capacity of the Hoo Peninsula and Town Centre sites is required as well as Masterplans and Infrastructure needs before this level of development can be accepted as sustainable.

Housing Mix

Policy H2: Housing Mix

The council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population.

Residential development will be permitted to encourage a sustainable mix of market housing to include an appropriate range of house types and size to address local requirements.

The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

Accommodation requirements as detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform which house sizes and mix should be delivered in urban and rural areas to meet the objectively assessed needs of the area.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council's housing register and discuss affordable housing requirements with the council's Housing Strategy team at the pre-submission stage of the planning process.

Large development schemes meeting the criteria set out at Policy H9, must demonstrate that sufficient consideration has been given to custom and self-build plots as part of housing mix.

The council will work with partners to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people.

Gypsy, Traveller and Travelling Showpeople accommodation requirements will form part of the borough's need for housing.

H2a Does the proposed policy for housing mix represent a sound approach?

~~Yes~~

No

H2b Please explain why you do / don't think the proposed policy for housing mix represent a sound approach.

There is little identification or allocation of sites for specific local community needs rather than Medway wide. Low cost and affordable housing is a broad-brush approach and often leads to housing being allocated to people from outside of the area through Housing Associations, above local need.

H2c Would you suggest an alternative approach?

More recognition of local community needs (especially in parished areas).

Affordable Housing

Policy H3: Affordable Housing

On housing and mixed use development sites of 15 or more residential units the council will require the delivery of affordable housing.

The council will apply the following requirements for affordable housing provision:

- in rural Medway 30% of all residential units for developments of 15 or more dwellings
- in urban Medway 25% of all residential units for developments of 15 or more dwellings

Provision must be in accordance with the council's Guide to Developer Contributions and Obligations.

There will be a strong presumption in favour of the affordable homes being fully integrated within the proposed development. However the council may consider off site provision, where this enables other policy objectives to be met, subject to an equivalent level of developer contribution being provided.

Where affordable housing is to be provided offsite, the council's preferred position is for developers to directly providing affordable dwellings on an alternative site. Only where it can be demonstrated that this can not be provided, would the council consider a financial contribution from the developer which would enable provision through new build on an alternative site.

H3a Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision?

Agree

~~Disagree~~

H3b Please explain why you agree / disagree with threshold for contributions for affordable housing and the percentage requirements for its provision.

Caution must be exercised where developers agree an allocation, but then return to argue that the economics of the scheme have changed.

H3c What do you consider would represent an effective alternative approach?

H4 What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

This needs to be driven by more local needs. Schemes to lock in the low cost/affordable element should be given priority (perhaps providing technical and admin support to local communities, especially parish councils) to provide these.

Supported Housing, Nursing Homes and Older Persons Accommodation

Policy H4: Supported Housing, Nursing Homes and Older Persons Accommodation

The development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:

- Meets a proven need for that particular type of accommodation.
- Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs.
- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.
- Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.

Loss of specialist housing will be permitted only where it is demonstrated that there is no need for the form of accommodation.

H5a Do you agree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?

Agree

~~Disagree~~

H5b Please explain why you agree or disagree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation.

The only concern is the loss of this form of specialist housing in recent years and the need to provide extra to cover the shortfall.

H6a Do you consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs?

Yes

~~No~~

H6b Please explain why you do / don't consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs

Although there is a place for retirement villages etc. they should be integrated with the local community – perhaps through the development of facilities shared with the local community.

H7a Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme?

Yes

~~No~~

H7b Please explain why you do / don't consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme

This scale of housing would create a scale of development that would help the viability of a scheme rather than stand-alone.

Student Accommodation

Policy H5: Student Accommodation

The council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.

Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need.

The council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, and does not have a negative impact on the core functions of the town centres, and is consistent with strategic redevelopment plans.

These locations must be well served by public transport and accessible to a wide range of town centre, leisure and community uses.

Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land or leisure or community space.

Student housing will be required to provide a high quality living environment and include a range of unit sizes and layouts with and without shared facilities to meet requirements of the educational institutions they serve.

H8a Do you agree with the proposed policy for student accommodation?

Agree

~~Disagree~~

H8b Please explain why you agree or disagree with the proposed policy for student accommodation.

Student accommodation can be very supportive of the town centre economy.

H8c Would you propose an alternative approach?

n/a

Mobile Home Parks

Policy H6: Mobile Home Parks

Proposals for mobile or park home developments will be given the same consideration as other dwellings and will be subject to the same compliance with planning policy in assessing impact and sustainability.

The council seeks to protect existing parks from competing uses, but restrict their expansion outside designated areas. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area particularly those near areas of sensitive environmental interests.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home Park, or a reduction in the area available for their use will not be permitted.

The council will set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

Any proposals for updates or intensification must have careful consideration for the colour, massing and materials used, incorporate appropriate landscaping and have no adverse impact on the character of the locality or amenity of nearby residents.

H9a Do you agree with the proposed policy for mobile home parks?

Agree

~~Disagree~~

H9b Please explain why you agree or disagree with the proposed policy for mobile home parks.

There is a need for this class of housing, although it should be integrated with the local community where possible and any expansion should provide support for shared wider community facilities.

H9c Would you propose an alternative approach?

n/a

Houseboats

Policy H7: Houseboats

The council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim:

- To protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place.
- To specify criteria under which any further growth of houseboats will be allowed in order to minimise impact.
- To seek the removal and disposal of any vessel so moored if a boat sinks, or becomes unfit for habitation, derelict, or is otherwise abandoned.
- To seek opportunities to deliver improvements that benefit the local amenity and environment.

H10a Do you agree with the proposed policy for houseboats?

Agree

~~Disagree~~

H10b Please explain why you agree or disagree with the proposed policy for houseboats

n/a

H10c Would you propose an alternative approach?

n/a

Houses of Multiple Occupation (HMOs)

Policy H8: Houses of multiple occupation

The council seeks to avoid detrimental over concentrations of HMOs. Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where they:

- Do not adversely affect the character and amenity of the area, or the supply of family housing.
- Do not contribute to the over concentration of HMOs in a particular area.
- Do not contribute to the generation of excessive parking demands or traffic in an area.
- Make appropriate provision for the storage of waste

H11a Do you agree with the policy approach for HMOs?

Agree

~~Disagree~~

H11b Please explain why you agree or disagree with the policy approach for HMOs.

n/a

H12a Do you consider that the council should set locational criteria for HMOs, such as consideration neighbouring uses and proximity to other HMOs?

Yes

~~No~~

H12b Please explain why you agree or disagree that the council should set locational criteria for HMOs.

n/a

H13a Should the council make use of Article 4 Directions to restrict the ability to convert properties to HMOs?

Yes

~~No~~

H13b Please explain why you agree or disagree that the council should make use of Article 4 Directions to restrict the ability to convert properties to HMOs

n/a

Self-build and Custom Housebuilding

Policy H9: Self-build and Custom Housebuilding

The council will support self-build or custom build home development in sustainable and suitable locations.

To identify and provide for people who wish to build their own home, the council will maintain a register of interested parties and report the headline data annually on the council website after the end of each base period.

All new self-build/custom housebuilding applications

- Applicants will need to have regard to the local landscape and guidance from other relevant Local Plan policies in the same way that other types of residential applications do; this will ensure all types of new development are of high quality.
- If the number of self build plots on a single site exceeds 10, then a design code framework should be agreed with the council prior to the submission of individual planning applications. This will ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality.
- In accordance with Government guidance on Self-Build and Custom Housebuilding, the plots must be serviced (have access to a public highway and connections for electricity, water and waste water) or, in the opinion of a relevant authority, can be provided with access to those things within the duration of a development permission granted in relation to that land.
- Where a land owner has a suitable small site that they wish to obtain speculative outline residential permission for, they are encouraged to consider the plot for self-build or custom housebuilding, depending on the local demand.

Expanding/intensifying existing residential permissions

Where there is an existing residential permission and the developer approaches the council seeking to expand/intensify the development, the developer should demonstrate that they have considered some/all of the additional plots to be provided as serviced self/custom build plots, where there is identified demand.

Neighbourhood Plans

The council supports the consideration of self-build and custom housebuilding in the preparation of Neighbourhood Plans, and joint working with Neighbourhood Plan groups to establish a locally derived design code.

Council owned land and Regeneration

The council will consider opportunities for self-build housing in disposal of Council land and in promoting regeneration schemes.

H14a Do you agree with the self build and custom housebuilding approaches taken above?

Agree

Disagree

H14b Please explain why you agree or disagree with the self build and custom housebuilding approaches taken above

n/a

Self-build and Custom Housebuilding

Self Build Site Allocations

In considering site suitability, some sites have been identified from the Strategic Land Availability Assessment (SLAA) as having potential for self build and/or custom housebuilding use. Some of the larger sites may have potential for a proportion of the area to be suitable for self/custom build. The Council may seek to secure planning permission on any sites allocated for self/custom build by way of Local Development Orders after the Local Plan is adopted.

H15a Do you think that the council should allocate specific sites for self/custom housebuilding development?

~~Yes~~

No

H15b Please explain why you agree or disagree that the council should allocate specific sites for self/custom housebuilding development.

Sites may become available across the area and considered as they arise in accordance with these policies. There will need to be protection to avoid the principle of self-build being used to establish residential use (due to its special nature/allocation) and then a subsequent general housing development (probably at a higher density) coming forward and being developed instead.

If we do allocate self/custom build sites, we will advertise them on our website. The land owner would also be expected to market the site. When allocating a site/part of a site for self/custom build, it is important that there is realistic expectation of interest in the site. However, due to circumstances out of the control of the council and land owner, the site may not receive the interest that had been anticipated. We therefore propose that once an allocated site has sold and built out a certain proportion of the self build plots, if the land owner is unable to sell the remaining plots after marketing them for a further period of time (to the satisfaction of the council), they will then be allowed to firstly offer the plot(s) to the council/housing association, before being allowed to build out on the plot themselves or sell to a non self/custom builder/developer.

Yes

~~No~~

H16b Please explain why you agree or disagree with the approach set above

n/a

H16d After what further period of time of unsuccessful marketing do you feel it would be acceptable to offer the remaining plots on to the council/housing association or other non self/custom builders?

1 years

Self-build and Custom Housebuilding

Sites over 400 dwellings

In order to satisfy the demand from the register, we propose that applications on sites over a certain number of dwellings should make available at least 5% of the plots to self/custom builders for purchase. We suggest a threshold of 400 dwellings and over. The developer will need to provide robust evidence to demonstrate if this is not economically viable. This would apply to applications on new Local Plan housing allocations or windfall sites.

H17a Do you agree that sites over a certain size should offer a percentage of the plots to self/custom builders?

Yes

~~No~~

H17b Please explain why you agree or disagree that sites over a certain size should offer a percentage of the plots to self/custom builders

n/a

Following on from the question above, if a plot has been marketed (to the satisfaction of the council) for 12 months and not sold, we propose that it can then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market.

H18a Do you agree with this approach outlined above?

Agree

~~Disagree~~

H18b Please explain why you agree or disagree with this approach

n/a

With regards to these large sites of 400 dwellings or over, in order to prevent the completion of the overall site from being drawn out, exposing existing residents to extended periods of construction by their neighbours, we propose that if a plot is purchased by a self or custom builder, the dwelling must be built within 3 years of the date of sale, before being offered to other applicants on the self build register to purchase. If there is no interest, then it may then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. The onus would be on the developer to advise the council when each plot had been sold in order to monitor the development.

H19a Do you agree with this approach outlined above?

Agree

~~Disagree~~

H19b Please explain why you agree or disagree with this approach

n/a

Gypsy and Traveller Accommodation

Policy H10: Gypsy, Traveller and Travelling Showpersons

Safeguarding Existing Sites

Existing permanent authorised gypsy and traveller sites and sites for travelling showpeople will be retained, unless:

- There is a surplus of available accommodation over and above the required five year supply of sites, or,
- The site will be replaced by a site of similar proportions in an appropriate location which complies with the criteria listed below for new sites, or,
- A site has been granted a personalised permission restricting residency to a named occupier or family.

New Sites

Proposals for new gypsy, traveller and travelling showperson sites (temporary or permanent) will be permitted, in accordance with the council's planning policies if they meet the following criteria:

- Need – the council is satisfied that there is a clear need for the site and the proposal cannot be met on existing available sites or an allocated site
- Location – within an accessible walking distance to local facilities for education, healthcare, and convenience retailing.
- Not located in the Green Belt, flood risk zones 2 & 3, areas covered by landscape or environmental designations (AONBs, SSSI, Ramsar, SPA, SACs, Ancient Woodland or local nature reserves), protected open spaces or protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas), or the best and most versatile agricultural land, of Grades 1, 2 or 3a).
- Scale – a site should respect its location and surrounding environment and be embedded within it and not intrude onto the landscape. The council will require a landscape strategy as part of the application to confirm the details of this.
- Pitches and plots should be of a sufficient size and, on sites for Travelling Showpeople have space for adequate storage.
- Access – there is safe and convenient pedestrian and vehicular access to the public highway, with adequate space on site for vehicle turning and parking

H20a Does this represent a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs?

Yes

~~No~~

H20b Please explain why you agree or disagree that this is a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs

n/a

H21a Do you consider that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan?

Yes

~~No~~

H21b Please explain why you agree or disagree that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan

More detailed site investigation and assessment will be required before any site can proceed. A policy should be developed that outlines acceptable criteria and be subject to public consultation before adoption.

Employment

This section sets the context of Medway's economy, with details of land needed for employment sites, and how we can boost the local economy, particularly in securing better quality jobs and benefiting from links with our universities and colleges. These inform the main 'economic development' policy and Medway's key economic sectors including the rural economy and tourism including associated visitor needs.

Q5 Thinking about the employment section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's economic needs?

The infrastructure needs, especially transport will be key to meeting economic needs. The needs of the wider area will also contribute to a positive environment for economic development.

There are technical questions asked about the following employment policy approaches:-

- Economic Development
- Rural Economy
- Tourism
- Visitor Accommodation

Economic Development

Policy E1: Economic Development

The council will seek to boost Medway's economic performance, securing a range of jobs for its workforce. The council will work positively with the local business community and major public sector employers, the Universities at Medway and further education providers, inward investors, strategic partnerships and neighbouring authorities to support sustainable economic growth and job creation.

The council will make provision in Medway for the scale, range, quality and locational requirements of employment land identified in the Employment Land Needs Assessment, 2015, or subsequent updated evidence. This will involve the safeguarding of sites, identification of redevelopment and investment opportunities, and allocations for new sites.

The plan will seek to increase the productivity of Medway's economy, as measured through GVA, through support for higher value employment. This will include the designation of specific employment sites as suitable for higher value employment. All planning applications for employment uses will be assessed for their GVA contributions and whether the proposed use is best aligned to the site characteristics and locational offer. The council and its partners will promote growth of employment sectors that have the best potential for higher value jobs.

The council will support actions to:

- Consolidate economic benefits from the regeneration programme in Medway, specifically seeking to strengthen the role of the town centres in providing wider job opportunities;
- Raise skills levels and provide apprenticeship and local labour opportunities;
- Realise opportunities for raising higher value employment through supporting the development of the Universities at Medway and the wider learning quarter, and linking to growth in the wider economy;
- Seek to accrue benefits for Medway's economy from strategic developments of infrastructure, housing and employment sites outside of the borough;
- Explore the extension of the successful Medway Innovation Centre model to provide additional serviced employment space for businesses;
- Seek the installation and upgrade of high speed broadband services in employment sites;
- Promote the diversification of Medway's economic base; and
- Secure sustainable employment uses for the strategic sites at Grain and Kingsnorth, achieving value from the specific location offer and the access to water and rail for freight movements, and realising opportunities for manufacturing of modern modular construction facilities.

E1a Do you consider that this is an effective approach to securing and strengthening Medway's economy?

Yes

No

E1b Please explain why you think that this is / is not an effective approach to securing and strengthening Medway's economy

It is relatively easy to allocate employment land, but difficult to fill (some of the site identified have been identified for decades but remain undeveloped).

An approach to assess the impact on local infrastructure needs, environmental and landscape impacts needs to be enhanced and incorporated with other pressures. There may also be pressure on schools/nurseries and employees seek provision close to their place of work.

E2 Which locations do you consider are the most appropriate for employment growth?

n/a

E3a Do you agree with the proposed approach to assessing GVA with planning applications for employment uses?

Yes

~~No~~

E3b Please explain why you agree or disagree with the proposed approach to assessing GVA with planning applications for employment uses

Supported, although appropriate small sites in or adjacent to villages should also be considered.

E4a Do you support the proposed approach for higher value jobs in Medway?

Yes

~~No~~

E4b Please explain why you support / do not support the proposed approach for higher value jobs in Medway

n/a

E5a Do you consider that there is demand for further serviced office accommodation in Medway?

Yes

~~No~~

E5b Please explain why you consider / do not consider that there is demand for further serviced office accommodation in Medway

With the growth in home-based employment, support facilities should be developed in local communities (villages) to provide a wide range of local services above just serviced offices.

Rural Economy

Policy E2: Rural Economy

The council will support the land based sector in Medway, through seeking to direct development to land of lesser agricultural land, where feasible, and promoting the sustainable development and diversification of farming and other land based rural businesses, where the proposals can demonstrate positive benefits and do not conflict with other policies in the Local Plan. The council will define countryside areas outside of the urban and village settlement boundaries, where the land based economy will be supported providing that it does not conflict with requirements to conserve and enhance the environment.

The council will support the growth of rural businesses in well-designed development in appropriate locations that respect the character of the countryside and environmental features. Sustainable rural tourism and leisure activities that are in keeping with their rural setting will be supported.

The council will seek the retention of key rural services and facilities to promote sustainable villages, providing for the needs of rural residents.

E6a Do you agree with the proposed policy approach for the rural economy?

Agree

~~Disagree~~

E6b Please explain why you agree / disagree with the proposed policy approach for the rural economy

Support for rural businesses will also require more local support and services (see E5a)

E6c What alternative approaches would you propose?

n/a

Tourism

Policy E3: Tourism

The council will positively promote sustainable tourism development that can make a positive contribution to Medway's economy and cultural life. Appropriate proposals for the development of tourism facilities and visitor accommodation will be supported where they meet the principles of sustainable development.

Tourism developments that can contribute positively to the regeneration of Medway, consistent with the council's vision, and extend the cultural offer will be considered favourably. Opportunities for development to enhance the vibrancy and vitality of town centres will be welcomed.

The enhancement of cultural assets and visitor facilities will be supported, where they respect the integrity of the surrounding area, particularly those assets associated with the local historic environment.

Opportunities to support the development of rural and marine based tourism will be welcomed, where they can demonstrate that negative impacts on the environment can be avoided.

Proposals for tourism facilities will be assessed against the principles below:

- Identified need for creation, expansion or improvement of tourism facilities.
- The proposal is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment.
- Maximises opportunities for sustainable travel.

E7a Do you agree with the proposed policy approach towards tourism?

Agree

~~Disagree~~

E7b Please explain why you agree or disagree with the proposed policy approach towards tourism

There is scope for developing tourism in the rural areas, but there does need to be some assessment and management of impacts to the environment and infrastructure.

E7c Would you suggest an alternative policy approach?

n/a

Visitor Accommodation

Policy E4: Visitor accommodation

The retention and provision of visitor accommodation is encouraged in accordance with the principles set out below:

- Where it meets a proven need, particularly those sectors of the market where evidence indicates unmet demand, such as a high quality boutique hotel in Rochester, and quality rural self-catering accommodation.
- Development enhances the quality and offer of existing visitor accommodation and its setting.
- Where the proposal contributes to the vibrancy, vitality and viability of town centres and the sustainability of wider settlements.
- Where the proposal avoids negative impacts on the environment, is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment, avoids siting in areas of high flood risk and intrusion into the landscapes of open countryside.
- Maximises opportunities for sustainable travel in accessible locations and minimises traffic generation.

E8a Do you agree with the proposed policy approach towards visitor accommodation?

Agree

~~Disagree~~

E8b Please explain why you agree or disagree with the proposed policy approach for visitor accommodation

Support and policies for Bed and Breakfast, Tourist Caravan Parks, Holiday Parks (Haven), Allhallows Place, Rural Hotels etc. do need to be developed as well.

E8c Would you suggest an alternative policy approach?

n/a

Retail and Town Centres

This section provides details of Medway's retail strategy, and considers the relationship between Medway's town centres and out of centre retail locations and retail parks. There is associated policy guidance to support and strengthen our town centres, neighbourhood and village centres and considering how Medway needs to respond to the major changes that have been taking place in shopping patterns over recent years.

Q8 Thinking about the retail and town centres section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?

There are technical questions asked about the following retail and town centre policy approaches:-

- Retail Hierarchy
- Sequential Assessment
- Impact Assessments
- Role, Function and management of uses in centres – Frontage
- Temporary uses
- Supporting Sustainable and Healthy centres
- Hempstead Valley District Centre
- Dockside
- Medway Valley Leisure Park
- Healthy sustainable communities
- Local Centres and shopping parades
- Retail Parks

Retail and Town Centres

This section provides details of Medway's retail strategy, and considers the relationship between Medway's town centres and out of centre retail locations and retail parks. There is associated policy guidance to support and strengthen our town centres, neighbourhood and village centres and considering how Medway needs to respond to the major changes that have been taking place in shopping patterns over recent years.

Q8 Thinking about the retail and town centres section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?

It will be important to assess the impact of retail and town centres on each other and ensure transport infrastructure is available to satisfy those needs. Quality public realm needs to be provided and well maintained. Marketing/tourist plans should be developed and widely publicised.

There are technical questions asked about the following retail and town centre policy approaches:-

- Retail Hierarchy
- Sequential Assessment
- Impact Assessments
- Role, Function and management of uses in centres – Frontage
- Temporary uses
- Supporting Sustainable and Healthy centres
- Hempstead Valley District Centre
- Dockside
- Medway Valley Leisure Park
- Healthy sustainable communities
- Local Centres and shopping parades
- Retail Parks

Retail Hierarchy

Policy RTC1: Retail hierarchy

The function of centres as multi-purpose destinations and the main locations for retail, community, leisure and employment will continue to be supported in relation to their individual role and scale. Chatham is the primary centre at the top of the hierarchy and will be the focus for the majority of comparison retail to meet the strategic needs for the authority and maintain its role in the hierarchy.

Medway's hierarchy of centres is:

I. Principal Town Centre: Chatham is the main location for comparison retail, community uses, leisure, culture and tourism (in support of local heritage assets and cultural focus).

II. District Centres: The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres: Strood, Gillingham, Rainham, Rochester, Hempstead Valley.

III. Local Centres: The authority seeks to maintain the sustainably accessed local top up shopping offer and to satisfy the day-to day needs of the local population.

New local centres or shopping parades compliant with the council's retail policies may be required in the following locations depending on the defined development strategy and proposals maps in the Local Plan, the scale of the proposal.

- Hoo St Werburgh rural town
- Rainham East
- Capstone

Proposals will need to be supported by a robust justification talking into account the existing provision, character and scale of the area and the demographics.

RTC1a Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway?

Yes

~~No~~

RTC1b Please explain why you consider / don't consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway

There does need to be more support for local top-up shopping and the provision of 'core' services that reduce the need to travel into District and Town Centres for basic items.

RTC2a Do you agree with the definition of Chatham as the primary centre at the top of the hierarchy?

Agree

Disagree

RTC2b Please explain why you agree or disagree with the definition of Chatham as the primary centre at the top of the hierarchy

This assumes the development of further employment, retail and entertainment in the area rather than out of town locations.

RTC3a Do you agree with the identified district centres?

Agree

~~Disagree~~

RTC3b Please explain why you agree or disagree with the identified district centres

n/a

RTC4 How do you consider that Dockside should be recognised in Medway's retail hierarchy?

Specialist Retail, Entertainment and Tourism

RTC5 Would you propose any alternative approaches to Medway's retail hierarchy?

No

Sequential Assessment

Policy RTC2: Sequential Assessment

Main town centre uses are directed to Medway's centres as identified in policy RTC1.

Proposals to locate or expand main town centre uses outside of defined centres, and where not in accordance with any part of the retail and main town centre uses strategy in the development plan, are required to demonstrate through a sequential assessment, within an agreed and defined catchment area, that there are no sequentially preferable sites available in accordance with the following sequence:

I. Chatham

II. Strood, Gillingham, Rainham, Rochester

III. Hempstead Valley Shopping Centre

IV. Local centre or edge of centre, whichever is better connected and able to support 1, 2 or 3 listed above

V. Out of centre

When considering sequentially preferable edge and out of centre sites, following demonstration of the unavailability of more central sites, preference will be given to edge and out of centre sites that are accessible and well connected to town centres respectively, i.e. consideration of edge of centre sites first.

The catchment area must be defined through discussions with the authority at the earliest opportunity and is dependent on the scale and type of the proposal and its ability to draw trade.

Large scale leisure proposals must be accessed by sustainable means, not have a negative impact on traffic and provide ease of access.

Proposals for ancillary development are required to be compliant with the policy set out above unless it can be:

- Justified as ancillary and necessary for the business operation;
- the type of use and scale of the proposal is secondary to the predominant/main use;
- demonstrated that there are dependencies between the proposal and the predominant/main use. Consideration will be given to the location of the proposal in relation to the predominant/main use;
- it may be necessary to manage the ancillary use through condition to maintain its secondary nature

The scale of the proposal may also require an impact assessment and therefore requires compliance with policy RTC3 where it meets the criteria.

RTC6a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Yes

No

RTC6b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

n/a

RTC6c Do you agree with the proposed sequential approach?

Agree

Disagree

RTC6d Please explain why you agree or disagree with the proposed sequential approach

n/a

RTC6e Would you propose alternative approaches?

n/a

Impact Assessments

Policy RTC3: Impact Assessments

Proposals that seek to locate or expand retail and other main town centre uses in edge or out of centre locations will be permitted where:

- a) it is supported by an impact assessment where proposals for comparison, convenience retail, or commercial leisure development exceeds a defined threshold set in the Local Plan; or other large scale leisure and office uses exceeds 2,500sqm.
- b) it is demonstrated that it would not have a significant adverse impact on:
 - Impact on the strategy - development, retail and main town centre uses strategy
 - Impact on vitality and viability of centres within the catchment of the proposal
 - Impact on existing, planned or committed town centre investment
 - Consideration is given to the cumulative impact of proposals considered relevant and to the health of centres

is given to the local context and the vulnerability of the authority's centres

- c) Where appropriate development proposals may be conditioned to reduce the impact on centres where there is an impact but is not considered significantly adverse to justify refusal.

RTC7a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Yes

~~No~~

RTC7b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

Need to also identify highways local shopping centre impacts.

Ongoing impacts also need to be undertaken and policies developed rather than a point in time prior to development.

RTC8a Do you agree with the proposed approach to impact assessments?

Agree

~~Disagree~~

RTC8b Please explain why you agree or disagree with the proposed approach to impact assessments

n/a

RTC9a What do you consider would represent an appropriate size threshold for developments to undertake an impact assessment?

n/a

RTC9b Would you propose alternative approaches?

n/a

Role, Function and management of uses in centres – Frontage

Policy RTC4: Frontages

Proposals within frontages of centres must be in accordance with the council's design policies and:

- provide an active frontage at ground floor level, which is accessible and attractive to pedestrians. The presence of a larger proportion of show window space is required.
- be of appropriate scale, format, design and character reflective of the facades above ground floor, the centre's role and function and the Council's ambitions as set out in RTC1 and RTC5
- Protect and where possible enhance the public realm through well planned and coordinated planting, improvements to surfacing/paving and other environmental enhancements.
- Must demonstrate no harm to other neighbouring businesses, residential public and visual amenity through impacts such as noise, light, odour, late night activity, litter and general disturbance.
- Any proposals for shutters must maintain views into shops when closed, be back lit, powder coated and any housing should relate well to shop frontage and signage.

Policy RTC5: Role, Function and management of uses in centres – Frontage

The council seeks to establish a robust, vital and viable retail core in support of competitive, sustainable and healthy centres compliant with its retail policies. A mix of uses is supported with due consideration of avoiding an overprovision or concentration of the same type of uses.

Primary Frontage

Proposals for non-A1 uses within the primary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy provided the provision of A3 uses do not result in an over concentration in Rochester District Centre.

Where the proposal results in the loss of A1 premises, permission will be granted where:

- i. it is consistent with the policy above.
- ii. in all other cases the unit has remained vacant for at least 6 months and the applicant can demonstrate:
 - reasonable attempts were made without success to let the premises for A1 use;
 - that the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy of the centre.

Greater efficiency in the use of upper floors will be supported and encouraged.

Secondary Frontage

Proposals for non-A1 uses within the secondary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy and where provision of A3 uses does not result in over provision in Rochester district centre.

Where the proposal results in the proportion of A1 representation falling below the threshold defined by the council and/or results in the loss of A1, A3, D2, community and cultural uses, permission will be granted where:

- reasonable attempts were made without success to let the premises for the last use
- the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy.

RTC10a Do you agree that this proposed approach represents an effective approach to planning for the city and district centres in Medway?

Agree

~~Disagree~~

RTC10b Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for the city and district centres in Medway

n/a

RTC11a Do you consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

~~Yes~~

No

RTC11b Please explain why you consider / don't consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f in the Development Strategy Document

n/a

RTC12a Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

Agree

~~Disagree~~

RTC12b Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f in the Development Strategy Document?

Yes

RTC13 Do you consider that there are alternative approaches to manage this aspect of Medway's main centres?

n/a

Temporary uses

Policy RTC6: Temporary uses

Proposals for a temporary use of vacant units within town and local centre frontages will be supported for a period of up to 6 months where compliant with the council's design and retail policies and:

- where the unit has been vacant for at least 2 months;
- where the proposed use makes a contribution to the vitality and viability of the centre;

Erection of structures for the operation of the business must be easily removable

Temporary permissions will only be renewed for a single additional period where:

- The original temporary permission was granted for a period of less than 4 months
- Reasonable attempts were made to let the premises without success
- The current temporary use can demonstrate benefit to the centre and success of business.

RTC14a Do you agree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway?

Agree

Disagree

RTC14b Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway

Mention should also be made for similar temporary community use in local centres

RTC14c Would you propose alternative approaches?

n/a

Supporting Sustainable and Healthy Centres

RTC7: Supporting Sustainable and Healthy centres

Development proposals will help to create healthy and sustainable places, recognising the cumulative effect individual units and specific uses can have on the success of places.

The council will seek to manage the concentration and mix of specific premises to strengthen its centres and support healthier communities.

RTC15a Do you agree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area?

Agree

~~Disagree~~

RTC15b Please explain why you agree or disagree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area

n/a

RTC16a The council considers such specific uses to include 'high energy density food' outlets, which sell foods high in fat and/or sugar; betting shops; gaming centres; and premises selling alcohol, particularly for off licence sales.

Do you agree with this definition?

Agree

~~Disagree~~

RTC16b Please explain why you agree or disagree with the definition

n/a

RTC16c Do you think that the list should be amended?

No

RTC17a Do you think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above?

~~Yes~~

No

RTC17b Please explain why you think / don't think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above

Reduction in flexibility and use of otherwise vacant properties.

RTC18a Do you think that such uses should be restricted near schools and youth facilities?

~~Yes~~

No

RTC18b Please explain why you think / don't think that such uses should be restricted near schools and youth facilities

Better facilities should be developed on-site, otherwise local community provision is impacted.

RTC19a Do you think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis?

Yes

~~No~~

RTC19b Please explain why you think / don't think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis

n/a

Hempstead Valley District Centre

RTC8: Hempstead Valley District Centre

Hempstead Valley is different to the other traditional centres with high streets. The council recognises that it provides for local needs and therefore supports the modernisation and growth of this where supportive of this local function.

Further retail and leisure development, appropriate to the character and role of the centre will be supported, following a sequential or impact test, where it can be demonstrated that it does not undermine the viability of main town centres in Medway.

RTC20a Do you consider this is the appropriate approach to planning for Hempstead Valley shopping centre?

Yes

No

RTC20b Please explain why you consider / don't consider that this is an appropriate approach to planning for Hempstead Valley shopping centre

n/a

RTC21a Do you think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway?

Yes

No

RTC21b Please explain why you think / don't think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway

n/a

RTC22a Do you support a policy approach that seeks to achieve a balance of uses across all centres in Medway?

Yes

~~No~~

RTC22b Please explain why you support / don't support a policy approach that seeks to achieve a balance of uses across all centres in Medway

n/a

Dockside

RTC23a Do you support a policy approach that recognises the family leisure role of Dockside?

Yes

~~No~~

RTC23b Please explain why you support / don't support a policy approach that recognises the family leisure role of Dockside

n/a

RTC24 What do you think is the appropriate approach to further growth? Should policy only allow a small amount of new 'convenience' retail, or support a wider range of services and shops to develop its role as a local centre?

n/a

Medway Valley Leisure Park

Policy RTC9: Medway Valley Leisure Park

Medway Valley Leisure Park is a family leisure destination that attracts visitors and residents in the area.

The council's retail policy directs all leisure uses firstly to Medway's centres. Development proposals will be supported where enhancing current provision without requiring expansion beyond the designated boundary, subject to compliance with the council's retail policies:

- satisfying that no sequentially preferable sites were found;
- that the impact assessment has been satisfied where triggered

RTC25a Do you consider that this is an appropriate approach to planning for Medway Valley Leisure Park?

Yes

~~No~~

RTC25b Please explain why you consider / don't consider that this is an appropriate approach to planning for Medway Valley Leisure Park

n/a

RTC26a Do you think that there should be a specific policy to manage the development of Medway Valley Leisure Park, or if proposals should only be determined by use of wider retail policies?

There should be a specific policy

~~Proposals should be determined by use of wider retail policies~~

RTC26b Please explain your answer

The special nature of the area needs specific policies and any retail element would need to be resisted (unless a rail station alongside could be developed).

Healthy Sustainable Communities

Policy RTC10: Healthy sustainable communities

The council will support the provision of services and facilities, in accessible locations, to support the day-to-day activities of residents in a sustainable manner. Considerations of sustainability will include the offer (balance of retail, community uses and services), and accessibility - the mode of travel and distance.

The council recognises the importance of local services in villages as critical to sustainable rural communities.

RTC27a Do you agree with this proposed approach to sustainable communities?

Agree

~~Disagree~~

RTC27b Please explain why you agree or disagree with this proposed approach to sustainable communities

Local facilities, provision for outreach services and multi-use locations should be supported and encouraged to provide for those less able to travel (cost/disability) and to reduce car traffic into district and town centres.

RTC27c What alternative approaches would you suggest?

n/a

Local Centres and Shopping Parades

RTC11: Local Centres and Shopping Parades

Uses within a defined local centre or smaller shopping parades must be appropriate to the scale, character and role of the centre or parade, be compliant with the council's retail policies and include the following uses to support the core function:

- Convenience retail offer to provide top up shopping
- Community uses (such as hall, library, notice board)
- Services (such as hairdressers, cash machines)
- provide convenience for local communities (allowing various activities to be undertaken)

Proposals resulting in the loss of the core uses listed above will be permitted in local centres and shopping parades where in compliance with the council's retail policies:

- it is demonstrated that the loss is mitigated by similar uses of community value in close proximity;
- it is demonstrated that the proposed use would make a positive contribution to the vitality and viability and balance of uses in the centre and is of appropriate scale and character;
- the unit has remained vacant for at least 6 months and can be demonstrated that reasonable attempts have been made, without success, to let or sell the premises for a shop or community use.

RTC28a Do you consider that this is the appropriate approach to planning for small retail areas?

Yes

~~No~~

RTC28b Please explain why you consider / don't consider that this is the appropriate approach to planning for small retail areas

n/a

RTC28c Do you think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis?

~~Yes~~

No

RTC28d Please explain why you think / don't think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis

Local village services need to be supported and enhanced where possible and this should be an important policy rather than left to a case by case basis.

Retail Parks

Policy RTC12: Retail Parks

Retail proposals will be permitted in defined retail parks (Strood Retail Park, Horsted Park, Gillingham Retail Park) appropriate to their character where the following criteria are satisfied:

- Provision of suitable access, parking or parking arrangements;
- It is demonstrated that no locations in-centres are available where uses are typical of and more appropriate for a town centre location;
- It is demonstrated satisfaction of an impact assessment that there will be no impact on centres, with particular attention to vitality, viability, vibrancy and sustainability of the existing centres and their vulnerabilities
- No significant impact on the transport network and parking in the surrounding area
- Good public realm and linkage to the neighbouring centre is provided assisting in linked trips and increasing dwell time in the neighbouring centre.

An impact and sequential assessment for non-minor retail (above 2,500sqm) will be required to take account of the cumulative impact of recent significant proposals.

Where appropriate the council will require:

- conditions or legal agreements will be required to manage impact on centres, including a condition on the type and range of goods.
- Public realm works to facilitate better linkage with the centre.

RTC29a Do you consider that this is an effective approach to planning for retail parks?

Yes

No

RTC29b Please explain why you consider / don't consider that this is a effective approach to planning for retail parks

n/a

RTC29c Would you suggest alternative policies for planning of development in retail parks?

n/a

Natural Environment and Green Belt

This section highlights the requirement to protect Medway's natural assets, including designated wildlife habitats, parks and other green spaces. It also considers how we can improve our resilience to climate change, including flooding, and improve levels of air quality.

Q11 Thinking about the natural environment and greenbelt section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support conservation and enhancement of the environment in Medway?

The amount and quality of the designates environment assets are worthy of protection, and enhancement and should be publicised. However the non-designated environment will also contribute to and complement this. Appropriate sites should be considered for designation and support from developers and the community.

There are technical questions asked about the following natural environment and green belt policy approaches:-

- Sites of international importance for nature conservation
- Conservation and Enhancement of the Natural Environment
- Kent Downs Area of Outstanding Natural Beauty
- Landscape
- Securing strong Green Infrastructure
- Green Belt
- Flood and Water Management
- Air Quality

Sites of international importance for nature conservation

Policy NE 1: Sites of international importance for nature conservation

The estuaries and marshes of the Thames, Medway and Swale are designated Special Protection Areas (SPAs) and Ramsar sites in recognition of their international importance as wetland habitats. There is a Special Area of Conservation in the North Downs woodland near north Halling. These sites require the highest level of protection from development that could damage the features of the designated areas. No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site, alone or in combination with other plans or projects, as it would not be in accordance with the Habitat Regulations 2010 (as amended) and the aims and objectives of this emerging Local Plan.

The council will work in collaboration with local planning authorities in north Kent to contribute to the delivery of a strategic access management and monitoring scheme to address potential damage from population increases on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

Development within 6km of these areas designated as the Special Protection Areas and Ramsar sites that has the potential to generate additional visits to these coastal areas will be required to make a defined tariff contribution to a strategic package of measures agreed by the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) Project Board.

The council will consider the potential for adverse impacts on the Special Areas of Conservation arising from development, either alone or in combination with other plans and projects. If the assessment shows that there is a potential for adverse impacts, steps will be taken to restrict or mitigate development

NE1a Do you consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats?

Yes

~~No~~

NE1b Please explain why you consider / don't consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats

n/a

NE1c What alternative approaches would you recommend to secure the favourable condition of these areas?

n/a

Conservation and Enhancement of the Natural Environment

Policy NE2: Conservation and Enhancement of the Natural Environment

The council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy NE1, Medway includes Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites and a Marine Conservation Zone.

The council will promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.

NE2a Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment?

Yes

~~No~~

NE2b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing Medway's natural environment

NE2c What alternative approaches would you recommend to secure the favourable condition of these areas?

n/a

Kent Downs Area of Outstanding Natural Beauty

Policy NE3: Kent Downs Area of Outstanding Natural Beauty

Development proposals in the Kent Downs AONB and in the setting of the downs will be required to contribute to the conservation and enhancement of the natural beauty of this designated landscape.

Development must demonstrate that it has have regard to the Kent Downs Management Plan and associated policy guidance.

NE3a Do you consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB?

Yes

~~No~~

NE3b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB

n/a

NE3c What alternative approaches would you recommend to secure the components of natural beauty?

n/a

Landscape

Policy NE4: Landscape

The council attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, containing urban sprawl and separation of settlements.

An updated Medway Landscape Character Assessment and Green Infrastructure Framework will provide a basis for determining the acceptability of development proposals and areas and features that need to be protected and enhanced.

Development proposals will be required to demonstrate that they protect, strengthen and connect features of local landscapes.

NE4a Do you consider that this is an effective approach to landscape policy in Medway?

Yes

~~No~~

NE4b Please explain why you consider / don't consider that this is an effective approach to landscape policy in Medway

n/a

NE4c What alternative approaches would you recommend?

n/a

Securing strong Green Infrastructure

Policy NE5: Securing strong Green Infrastructure

The council will protect the network of green infrastructure across rural and urban Medway. The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a Special Protection Area, Ramsar site and/or Special Area of Conservation. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland.

The council will consider the need to protect the special features of Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves

Wider components of the green infrastructure network will be protected in line with the analysis and strategy set out in the emerging Green Infrastructure Framework. This will include open space assets, landscape buffers and green infrastructure zones.

New development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.

The council will expect development proposals to demonstrate that they are designed to be resilient to, and can adapt to the future impacts of climate change, in strengthening ecological networks.

The council will promote the extension of the green infrastructure network through setting criteria for the establishment and maintenance of Local Green Spaces.

Opportunities will be sought to promote and enhance the public rights of way network, including footpaths, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside.

NE5a Do you consider that this is an effective approach to securing effective and healthy green infrastructure in Medway?

Yes

~~No~~

NE5b Please explain why you consider / don't consider that this is an effective approach to securing effective and healthy green infrastructure in Medway

n/a

NE5c What alternative approaches would you recommend to secure effective and healthy green infrastructure in Medway?

n/a

Green Belt

Policy NE6: Green Belt

The council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.

The council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

NE6a Do you agree with the proposed policy for Green Belt?

Agree

~~Disagree~~

NE6b Please explain why you agree or disagree with the proposed policy for Green Belt

Supported, although there should be a review of the green belt boundary to the west of Medway, rather than the existing boundary that, mainly, follows the KCC/Gravesham/Medway boundary.

NE6c Do you consider that the exceptional circumstances exist to justify the review of the Green Belt boundary?

Yes

~~No~~

NE6d Please explain why you consider / don't consider that the exceptional circumstances exist to justify the review of the Green Belt boundary

Some areas on the Medway side of the Green Belt boundary are under pressure for development and should be considered for inclusion in the Green Belt to protect them and their impacts on the green belt.

NE6e Do you have suggestions for alternative approaches to Green Belt policy?

The boundary should follow landscape features rather than administrative boundaries.

Flood and Water Management

Policy NE7: Flood and Water Management

The Local Plan will seek to reduce flood risk, promote water efficiency measures, and protect and enhance water quality through the following mechanisms:

Flood Risk Management

- Ensuring that development has a positive or nil impact on flood risk management interests
- Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.
- Where development benefits from an existing or proposed flood infrastructure, the development should contribute towards the capital costs and/or maintenance of these defences over the lifetime of the development.

Sustainable Urban Drainage

Development should enable or replicate natural ground and surface water flows and decreased surface water runoff, via the use of Sustainable urban Drainage systems (SUDS), utilising green infrastructure where possible and as guided by relevant national (and/or local standards) and guidance.

Where SuDs are provided, arrangements must be put in place for their management and maintenance over their full lifetime.

Water Supply

Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and it does not put at risk the ability to maintain a public water supply.

Water Quality

All new development should have regard to the actions and objectives of appropriate River Basin Management Plans (in Medway, this is the Thames River Basin District) in striving to protect and improve the quality of water bodies in and adjacent to the district, as well as ecology, geomorphology, and water quantity. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary.

Adaptation to Climate Change

Development will be required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures. These include:

- Incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment.
- Minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDs in accordance with (SuDs policy above).
- Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading.

- Seeking opportunities to make space for water and develop new blue infrastructure to accommodate climate change.
- Where possible watercourses and wetland features will be adequately buffered from development commensurate with the designation and/or ecological value of those features so that they can be safeguarded and managed sustainably in perpetuity.
- Provision for buffering, mitigating and extending habitats and green corridors to ensure that wildlife populations are more resilient for a changing climate.

NE7a Do you agree with the proposed policy for flood and water management?

Agree

~~Disagree~~

NE7b Please explain why you agree or disagree with the proposed policy for flood and water management?

n/a

NE7c Do you have suggestions for alternative approaches for this policy area?

n/a

Air Quality

Policy NE 8: Air Quality

The council seeks to reduce exposure to areas of poor air quality, maintain areas of good air quality, and where possible improve air quality through restricting development or requiring acceptable and effective mitigation measures.

Proposed developments which have the potential to impact on air quality will be expected to be accompanied by air pollution impact assessments and mitigation measures, in accordance with local air quality guidance.

All proposals should take account of the Medway Council Air Quality Planning Guidance that sets out a screening checklist for major size development and proposed development within, or close to an AQMA. Depending on the scale of development, the council may require the submission of an Air Quality Assessment and/or an Emissions Mitigation Assessment.

The guidance also advocates mitigation measures for all development. Where mitigation is not integrated into a scheme, the council will require this through a planning condition(s). If on site mitigation is not possible, then the council may seek contribution to wider air quality mitigation measures through a planning obligation.

NE8a Do you agree with the proposed policy for air quality?

Agree

~~Disagree~~

NE8b Please explain why you agree or disagree with the proposed policy for air quality?

n/a

NE8c Do you have suggestions for alternative approaches for this policy area?

n/a

Built Environment

This section is concerned with the impact development has on its surroundings, especially in terms of historic character and appearance of areas. Buildings must be designed and delivered in a sustainable way; residential accommodation needs to be delivered to an appropriate density and to provide the space people need to live.

Q14 Thinking about the built environment section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support sustainable development and high quality design in Medway?

Quality of development, including well maintained public spaces, will be an important factor and it is important to discourage estates of identical housing, but variety in setting and design should be encouraged.

There are technical questions asked about the following built environment policy approaches:-

- Promoting High Quality Design
- Sustainable Design
- Housing Design
- Housing Density Approach
- Historic Environment and Managing development in the historic environment

Promoting High Quality Design

Policy BE1: Promoting High Quality Design

Development in Medway will be expected to be of high quality design that makes a positive contribution and respond appropriately to the character and appearance of its surroundings.

Proposals that incorporate high quality design and sustainability which demonstrably consider the following criteria will be permitted:

- The scale and form of development is appropriate to its surrounding context and is characteristic of Medway, or where appropriate new high quality character;
- The protection and possible enhancement of the historic environment and heritage assets;
- How the proposal relates to and/or reinforces the local distinctiveness and character through the use of high quality materials and local vernacular materials where appropriate; landscaping and building detailing;
- Working with the topography of the site and the incorporation of existing natural features;
- Responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site;
- Makes efficient use of land and ensures appropriate streetscapes;
- Good connectivity permeability that provides a clear user hierarchy for pedestrians, cycles, public transport and cars and that streets and spaces within new residential developments are not overly car dominated;
- Demonstration of provision and/or access to essential services and facilities;
- Respects the amenity of neighbouring uses through consideration of light levels, overshadowing, overlooking, loss of privacy, visual intrusion, appropriately designed car parking and ensuring minimal impact through noise, vibration, fumes or light pollution, and other relevant considerations;
- Creates a safe environment;
- Buildings that are appropriately flexible/adaptable and in appropriate circumstances transformable in the interests of sustainable life-long places;
- Provides for discreet waste and recycling bin storage and collection in accordance with the 'Medway Waste Management Requirements for New Developments' or other superseding guidance;
- High quality landscaping and areas of public realm that make use of or retaining features considered relevant/important by the Council and demonstrating linkages/contribution toward green infrastructure assets and networks;
- Achieves a transition from urban to rural where appropriate;
- Includes measures to mitigate and adapt to climate change.
- For development to demonstrate sustainability criteria, such as at least meeting a BREEAM standard of 'Very Good' for both energy efficiency and water efficiency.

The Council would expect compliance with the principles of nationally recognised standards, such as the Lifetime Homes and Building for Life (BfL12) Standards, so far as practicable, across all proposed new housing.

Proposals that fail to take the opportunity to incorporate high quality design will be resisted.

BE1a Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?

Yes

~~No~~

BE1b Please explain why you think that the proposed policy for high quality design do / don't represent the most appropriate approach for the Medway Local Plan

Essential policy (and protections need to be built into developments to lock these in)

BE1c What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

n/a

Sustainable Design

Policy BE2: Sustainable Design

All new development should aim for high standards of sustainable design and construction where feasible.

For residential development this will include meeting the higher national water efficiency standard of 110 litres/person/day. Where possible on large developments, a water efficiency standard of 90 litres/person/day will be sought.

BE2a Does the proposed policy for sustainable design represent the most appropriate approach for the Medway Local Plan?

Yes

No

BE2b Please explain why you think the proposed policy for sustainable design does / doesn't represent the most appropriate approach for the Medway Local Plan

There needs to be standards for energy use (including micro generation)

Waste disposal/recycling needs need to be provided for.

BE2c What do you consider would represent a sound alternative approach towards sustainable design in the Medway Local Plan?

n/a

Housing Design

Policy BE3: Housing Design

New housing developments should provide good living conditions for future occupants with high quality, robust, adaptable housing and functional spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities. All new accommodation must, in addition to the general design policy above:

- As a minimum meet the relevant nationally described internal space standard for each individual unit;
- As a minimum meet the Medway Housing Design Standard (MHDS) for external spaces including shared outdoor amenity space, shared access and circulation, cycle storage, refuse and recycling, management, visual privacy and private outdoor space, environmental comfort;
- Be arranged to ensure primary habitable rooms have an acceptable outlook and where possible receive direct sunlight;
- Be designed to minimise the disturbance to occupants from other land uses nearby and/or other sources of noise, vibration and pollution;
- Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms, unless there is justification for doing so on the basis of a significant design quality gain;
- Incorporate sufficient space for storage and clothes drying;
- Encourage the extensive use of trees as a positive contribution to air/environmental quality within housing developments;
- Be designed with a clear and particular attitude to place-making and distinctiveness within their context.

BE3a Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan?

Yes

~~No~~

BE3b Please explain why you think the proposed policy for housing design does / doesn't represent the most appropriate approach for the Medway Local Plan Provision for waste management and recycling needs to be added to the policy.

n/a

BE3c What do you consider would represent a sound alternative approach for housing design in the Medway Local Plan?

n/a

Housing Density Approach

Policy BE4: Housing Density Approach

The council will seek the efficient use of land and secure positive contributions to place-making through supporting developments at higher densities in appropriate locations, where it can be demonstrated that it does not create an unacceptable impact on the surrounding amenity and environment, and has the potential to boost the vibrancy and vitality of town centres.

Density should be reflective of the particularity in its surroundings and make the most effective and efficient use of land.

The council will consider varying attitudes to density on a case by case basis in developing masterplans and development briefs for regeneration sites.

Densities surrounding transport interchanges (railway stations and bus stations) will be expected to be higher to reflect the nature of these areas as transport hubs providing sustainable travel choices.

A range of house types should be considered regarding housing mix.

BE4a Does the proposed policy for housing density represent the most appropriate approach for the Medway Local Plan?

Yes (in general)

~~No~~

BE4b Please explain why you think the proposed policy for housing density does / doesn't represent the most appropriate approach for the Medway Local Plan

In general supported, although higher densities surrounding transport interchanges (railway station and bus stations) may be appropriate in the urban areas but will not to be practical in rural locations that do not have a wider range of retail and community facilities (noted that this idea was suggested by the Government)

BE4c Is there an alternative way to express optimum net residential density, e.g. habitable rooms per hectare?

n/a

BE4d What do you consider would represent a sound alternative approach for housing density in the Medway Local Plan?

n/a

Historic Environment and Managing development in the historic environment

Policy BE5: Historic Environment

To ensure the continued contribution that the historic environment has on Medway, the council will support the conservation and, where possible, the enhancement of the historic environment; including the heritage assets and their distinctiveness and characteristics. This will be achieved through:

- Restricting development that could have an unacceptable impact on a designated heritage asset and its setting;
- Ensuring that all new development contributes to local distinctiveness and character;
- Encouraging development that makes sensitive use of historic assets, particularly where they are under-used or redundant;
- Promoting the preservation of historic buildings considered to be 'at risk';
- Resisting demolition or destruction of heritage assets without substantial justification that clearly demonstrates that public benefit outweighs the harm or loss resulting from the demolition or destruction;
- Working with stakeholders on heritage initiatives, including bids for funding.

Policy BE6: Managing development in the historic environment

Development that impacts a heritage asset, or its setting, should achieve a high quality of design which will preserve or enhance the asset's historic or architectural character, appearance and setting.

Where a development impacts upon a heritage asset, or its setting, a proportionate heritage assessment must be submitted that assesses the level of impact.

The demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that all possible methods of preserving the asset have been investigated. In the circumstances where the loss of a heritage asset can be fully and robustly justified, the developer must make information about the heritage asset and its significance available to the council, along with making it possible for any materials and features to be salvaged.

Where a development involves, or has the potential to involve heritage assets with archaeological interest, applicants must submit a desk-based assessment, or where appropriate, a field evaluation.

BE5a Do the proposed policies for the historic environment represent the most appropriate approach for the Medway Local Plan?

Yes

~~No~~

BE5b Please explain why you think the proposed policies for the historic environment do / don't represent the most appropriate approach for the Medway Local Plan

n/a

BE5c What do you consider would represent a sound alternative approach towards planning for the historic environment in the Medway Local Plan?

n/a

Health and Communities

This section identifies the opportunities to enhance health and well-being as Medway grows. It focusses on healthcare facilities, supporting healthy lifestyles, and community facilities that support good quality of life.

Q17 Thinking about health and communities section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to help improve the quality of life for Medway's residents?

It is vital to provide local quality public open space and access to the countryside and riverside (both the Thames and Medwy) for walkers, cyclists and horse riders where practical. Gaps in connectivity need to be identified and joined with support of developer contributions.

Promoting Health and Wellbeing

Policy HC1: Promoting Health and Wellbeing

The council is committed to reducing health inequalities, increasing life expectancy and improving quality of life. It will support work to improve economic and social opportunities to tackle disadvantage across Medway by:

- Seeking opportunities to improve access to healthcare facilities and activities that promote physical and mental health and wellbeing.
- Requiring planning applications for major new residential developments where Environmental Impact Assessments are required, or developments identified by the council with the potential for negative health impacts, to be accompanied by a health impact assessment in line with the HUDU Rapid Health Impact Assessment Tool. The results of this assessment will be a material consideration in determining applications.
- Helping to tackle obesity, encourage physical activity and support mental wellbeing, through the provision of greenspaces, public realm and sports facilities accessible to all, creating and enhancing environments conducive to walking and cycling.
- Ensuring new development is sustainably located with access to local health facilities, and contributes to increasing capacity in line with the scale of proposed growth, and the council's policy for infrastructure contributions from developers.
- Increasing access to healthy food choices through extending opportunities for growing food such as allotments & community gardens; securing a range of local services; and a reduction in the proliferation of uses promoting unhealthy food options, including controls on A5 uses, in line with the council's Hot Food Takeaway Guidance Note.
- Promoting health and wellbeing through the design and layout of development in order to mitigate health conditions, such as dementia, and improve the accessibility of public places.
- Working alongside healthcare commissioners to plan for the future of acute care the council will seek to investigate the redevelopment of the present Medway Maritime Hospital site and if deemed necessary the relocation, or partial relocation of some services, to a new site within Medway.

HC1a Does the proposed policy for Health and Wellbeing represent the most appropriate approach to planning for health improvements in Medway?

Yes

~~No~~

HC1b Please explain why you think the proposed policy for Health and Wellbeing does / doesn't represent the most appropriate approach to planning for health improvements in Medway

n/a

HC2a Do you agree with the proposed threshold for HIAs?

Agree

~~Disagree~~

HC2b Please explain why you agree or disagree with the proposed threshold for HIAs

n/a

HC3a Do you agree with the council's proposed approach to managing Hot Food Takeaways?

Yes

~~No~~

HC3b Please explain why you agree or disagree with the council's proposed approach to managing Hot Food Takeaways

n/a

HC4 What do you consider would represent a sound alternative approach towards planning for health in the Medway Local Plan?

More publicity for what is already in place and identification of core gaps/improvements that will be supported, land uses that impact on them resisted and support through developer contributions sought for them.

Community Facilities

Policy HC2: Community Facilities

The council recognises the importance of community facilities and the need for an appropriate range of facilities as a key component of sustainable development. The council will seek to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors.

The council will support appropriate development that seeks to enhance community facilities, that does not have a negative impact on the surrounding amenity, historic and natural environment and transport networks.

The council will require provision to be made for community facilities in planning for new development. Large scale residential developments will be required to provide community facilities to meet the needs of new residents and seek opportunities to support integration with existing communities.

New community facilities should be located within or near the community they are intended to serve and should be appropriately located to limit the need to travel, being accessible to users by walking, cycling and public transport.

If the development is smaller scale and community facilities cannot be accommodated on site, a contribution will be sought to upgrade appropriate facilities off site, where it can be demonstrated that they are accessible to residents of the new development and that there is capacity for the increased population. All developments for over 10 homes will be required to contribute to upgrading community facilities in line with the council's policy on infrastructure contributions from developers.

There is a presumption against the loss of community facilities in rural and urban areas. Any proposal which would result in the loss of a community facility will not be permitted unless:

- an alternative community facility which meets similar local needs to at least the same extent is already available; and
- it can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character and vitality of the area; and
- in the case of commercial community facilities, it has been demonstrated that it is no longer economically viable and cannot be made so.

HC5a Does the proposed policy for Community Facilities represent the most appropriate approach to planning for this aspect of social needs in Medway?

Yes

~~No~~

HC5b Please explain why you think the proposed policy for Community Facilities does / doesn't represent the most appropriate approach to planning for this aspect of social needs in Medway

Community Facilities identified, protected and developer contributions towards their upkeep and development considered.

HC5c Do you agree with the proposed approach to addressing the presumption against loss of community facilities?

Agree

~~Disagree~~

HC5d Please explain why you agree or disagree with the proposed approach to addressing the presumption against loss of community facilities

n/a

HC5e What do you consider would represent a sound alternative approach towards planning for community facilities in the Medway Local Plan?

n/a

Infrastructure

Sufficient supporting infrastructure is vital for delivery of growth in Medway. This section focuses on means of securing funding for services and infrastructure from development and planning for education, communications technology, utilities and open space and sports facilities.

Q20

Thinking about the infrastructure section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to help improve Medway's infrastructure?

There appears to be a lack of a comprehensive list of infrastructure requirements or how they would be delivered. A sequential approach to delivering them before or early in the development process does need to be established. There also needs to be an identification of what cannot be delivered without a firm commitment of contingent infrastructure.

Infrastructure Planning and Delivery

Policy I1: Infrastructure Planning and Delivery

The council will seek the timely and effective delivery of infrastructure to support the local economy and meet the needs of Medway's communities. It will seek opportunities through working with government agencies, infrastructure bodies, developers and partner organisations to secure improvements to infrastructure in Medway.

It will produce and regularly review an Infrastructure Delivery Plan, identifying the range, cost and scope of infrastructure improvements required in Medway.

Development coming forward in Medway will be expected to contribute to the delivery of new and improved infrastructure, in line with the council's evidence base and policy for infrastructure contributions from developers.

Appropriate conditions will be attached planning permissions in order to make development acceptable and to support the provision of infrastructure.

The council will identify land for safeguarding for the provision of future infrastructure where required to meet specific development needs.

The council will engage with appropriate bodies on strategic infrastructure planning matters, meeting the Duty to Cooperate and where appropriate, and through Statements of Common Ground supporting plan making.

I1a Does the proposed policy for Infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway?

Yes

No

I1b Please explain why you think the proposed policy for Infrastructure planning and delivery does / doesn't represent the most appropriate approach to planning for infrastructure improvements in Medway

The Infrastructure Delivery Plan needs to be established BEFORE the level of development in the local plan can be assessed as Sustainable.

I1c What do you consider would represent a sound alternative approach towards planning for infrastructure in the Medway Local Plan?

n/a

Developer Contributions

Policy I2: Developer Contributions

To make development acceptable and enable the granting of planning permission, deficiencies in infrastructure arising from proposed development will be mitigated through developer contributions and conditions.

Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to provide or contribute towards the additional requirement to an agreed delivery programme. Where demonstrated to be necessary, the council will require that infrastructure is delivered ahead of the development being occupied.

Where developers consider that providing or contributing towards the infrastructure requirement would have serious implications for the viability of a development, the council will require an "open book" approach and, where necessary, will operate the policy flexibly.

I2a Does the proposed policy for developer contributions represent the most appropriate approach?

Yes

~~No~~

I2b Please explain why you think the proposed policy for developer contributions does / doesn't represent the most appropriate approach

Early delivery of infrastructure will be needed – before or early in the development.

I2c What do you consider would represent a sound alternative approach for developer contributions in the Medway Local Plan?

Parish councils should be involved in, and able to comment on, suggested developer contributions from the earliest to final agreement. Allowing some local input into proposals and to encourage contributions that will benefit their communities.

Education

Policy I3: Education

Early Years & School Provision

As Medway's population grows additional school places will be needed. New residential developments of significant scale will be expected to provide education facilities within their development in order to create sustainable communities. The requirements will be informed by the council's School Organisation Plan and Education Planning Team providing an assessment of the capacity and suitability of existing local schools to expand existing school provision.

All proposals for residential developments over 10 homes will be required to contribute to the funding of education services in accordance with the council's policy for infrastructure contributions from developers.

Proposals for the upgrading and expansion of existing schools and development of new schools in locations where additional provision is required will be supported subject to the criteria below. The council may use its Compulsory Purchase powers to facilitate the development of new schools where necessary.

Proposals for new education facilities should:

- have safe access by cycle and walking, public transport and car and incorporate a school travel plan;
- have safe drop-off and pick-up provision;
- provide outdoor facilities for sport and recreation; and
- avoid conflict with adjoining uses.

The Council supports consideration of opportunities for co-location of community services and shared use facilities on school sites. Educational facilities shall be encouraged to diversify to provide a wider range of services to benefit the whole community, such as sports facilities or community centres open to the public.

Further & Higher Education

The development and expansion of the Universities at Medway and Higher and Further Education Colleges will be supported within the 'learning quarter' at Chatham Maritime. Development of supporting uses where there is an identified link to the Universities and other research and development establishments will be supported where appropriate, and does not conflict with other policies in the plan.

I3a Does the proposed policy for Education represent the most appropriate approach for planning for education facilities?

Yes

~~No~~

I3b Please explain why you think the proposed policy for Education does / doesn't represent the most appropriate approach for planning for education facilities

Priority MUST be given to the local education needs first and only if not possible should it be used on alternative sites that are accessible by public transport from the location.

I3c What do you consider would represent a sound alternative approach for planning for education facilities in the Medway Local Plan?

n/a

Communications Technology

Policy I4: Communications Technology

In order for Medway to achieve its economic and social potential and maintain its status as a well-connected place to live and work, the Council will seek to develop and enhance the provision of broadband and telecommunications infrastructure coverage across Medway.

When considering proposals for the development of communications installations, regard will be given to:

- operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications apparatus;
- the potential for sharing existing masts, buildings and other structures; and
- the impact of the development on its surroundings with particular regard to the visual amenity, character or appearance of the surrounding area, and the proposed provision of landscaping.

Apparatus and associated structures sited on a building should be sited and designed in order to seek to minimise impact to the external appearance of the host building.

Development should not have an unacceptable effect on conservation areas or buildings of architectural or historic interest or areas of ecological interest or areas of landscape value or sites of archaeological importance.

Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.

Broadband

Proposals for new major employment and residential developments should include appropriate infrastructure, wired and wireless, to provide high speed internet access as part of the development.

I4a Does the proposed policy for Communications represent the most appropriate approach for the Local Plan?

Yes (in general)

~~No~~

I4b Please explain why you think that the proposed policy for Communications does / doesn't represent the most appropriate approach for the Local Plan

There is insufficient identification of needs where access to, and speed of, communication technology is still relatively poor and the need for suppliers to work together to provide improvements.

14c What do you consider would represent a sound alternative approach for planning for communications infrastructure in the Medway Local Plan?

n/a

Utilities

Policy I5: Utilities

Any new development will be supported by the requisite utilities infrastructure.

The council seeks early engagement with utilities providers in planning to meet the strategic growth needs of Medway as set out in the Local Plan, and which supports the timely and sustainable delivery of development.

Significant new development proposals will be assessed to determine the impact on the existing network (water, electricity and gas).

I5a Does the proposed policy for Utilities represent the most appropriate approach for the Local Plan?

Yes (although still local concern about practical delivery)

~~No~~

I5b Please explain why you think that the proposed policy for Utilities does / doesn't represent the most appropriate approach for the Local Plan

Residents are concerned about the practical delivery of this, often based on experience if recent developments.

I5c What do you consider would represent a sound alternative approach for planning for utilities infrastructure in the Medway Local Plan?

n/a

Open Space and Sports Facilities

Policy I6: Open Space and Sports Facilities

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Policy I7: New Open Space Provision

Provision for new open space will be in line with specifically identified needs, informed by a robust assessment. Strategic scale development will be required to provide new greenspaces to meet community needs, and contribute to the quality of placemaking

Policy I8: New Playing Pitches

New pitches will be provided in line with specifically identified needs, informed by a robust assessment.

Any new playing pitches should be constructed in line with Sport England guidance.

I6a Do the proposed policies for open spaces, sports facilities and playing pitches represent the most appropriate approach for the Local Plan?

Yes

~~No~~

I6b Please explain why you think that the proposed policies for open spaces, sports facilities and playing pitches do / don't represent the most appropriate approach for the Local Plan

Requirements will need to consider the implications of LOSS of facilities and support for local provision that requires financial support to remain viable and support future needs.

I6c What do you consider would represent a sound alternative approach for planning for open spaces, sports facilities and playing pitches in the Medway Local Plan?

n/a

Gillingham Football Club

Policy I9: Gillingham Football Club

The Council recognises the positive benefits of a successful football club to the Medway community and economy and will work positively with the club to find an appropriate site for the development of a new stadium with associated facilities that should include education, employment, sports and leisure, community use and hotel and conference facilities. Any proposals must demonstrate the sustainability of the site, include an Environmental Impact Assessment and demonstrate the benefit to Medway as a place to live, work, learn and visit.

I7a Do you agree with the proposed policy for Gillingham Football Club?

Agree

~~Disagree~~

I7b Please explain why you agree or disagree with the proposed policy for Gillingham Football Club

n/a

I7c Do you support the relocation of Gillingham Football Club to a new stadium in Medway?

Yes (where policy stated can be met)

~~No~~

I7d Please explain why you do / don't support the relocation of Gillingham Football Club to a new stadium in Medway

n/a

I7e Where do you consider would be a suitable location for a relocated stadium?

n/a

I8 What uses would you expect to see come forward as part of any new stadium proposals?

Community facilities

Transport

This section looks at planning for transport networks and facilities to ensure our transport systems are fit for the future; making links to development, supporting businesses and leisure activities.

Q23

Thinking about the transport section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support a sustainable and effective transport network in Medway?

Road congestion is already high in many locations and movement round the Medway Towns compromised (and even more so when there is disruption on major roads). Use of public transport (including rail) across the towns should be encouraged. New developments will need to provide support for residents to plan their options and support alternatives to car use (where practical).

Parking in villages is a growing issue and car parking provision is key, as well as provision for community parking. Increased parking requirements for developments in the rural areas should be considered.

Promoting sustainable transport

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

T1a Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?

Agree Importance of air quality, noise and traffic congestion are major requirements. Use of the railway within the Medway Towns (East/West and North/South) needs further publicity and encouragement)

~~Not Agreed~~

T1b Please explain why you agree or disagree that this approach offers an appropriate strategic approach to transport planning in Medway

n/a

T1c What do you consider would represent a sound alternative approach towards sustainable transport in the Medway Local Plan?

n/a

Integrating Land Use and Transport Planning

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 (replicated below for ease of reference).

Proposals which compromise this policy will be resisted.

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

The approach is based on four walking zones centred on rail stations:

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

* Indicative for Development Strategy Scenarios 2 and 3 only

	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

T2a Do you agree/disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway?

Agree

~~Disagree~~

T2b Please explain why you agree or disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway

T3a 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?

Agree (as long as a rural densification is developed alongside an urban area)

~~Disagree~~

T3b Please explain why you agree or disagree that densification is more likely to increase the viability of additional and/or improved public transport services

n/a

T4a 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?

Yes

No

T4b Please explain why you think it is appropriate / inappropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs

Practical benefits outside major cities does not appear to be proven.

T4c Continuing to think about the optimum densities set out in Table 11.1. For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare?

Yes

No

T4d Please explain why, for peripheral areas, you think it is appropriate / inappropriate to require a minimum of 35 dwellings per hectare?

Case by case required.

T4e Would it be appropriate to include Cuxton and Halling stations in Table 11.1?

Yes

No

T4f Please explain why you think it would be appropriate / inappropriate to include Cuxton and Halling stations in Table 11.1

Rural stations do not have the range of services and facilities that support an increased density.

T5 What do you consider would represent a sound alternative approach towards the integration of land use and transport planning in Medway?

n/a

Hoo Peninsula rail connection

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.

T6a Do you support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight?

Yes (Strongly supported)

~~No~~

T6b Please explain why you support / do not support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight

Road access into town and to the major road network is already congested, without future developments. Vehicles need to be taken off the road where practical.

T6c The council welcomes responses indicating areas of land to be safeguarded. This information could be considered in a business case, subject to funding. Do you have any areas you would like to suggest:-

B2000 between Cliffe and Cliffe Woods for a future halt/station.

Land around Kingsnorth for a passenger terminal station and transport interchange for the Hoo Peninsula.

T6d What alternative approaches would you suggest?

Start with basic service (2/3 coach battery/hybrid to Medway Towns (Strood Platform 3)) and then grow with services towards London as demand grows (when/if Crossrail comes to Gravesend and other Gravesend services can be extended). Initial costs will have to be met, in the main, by developer contributions so a relatively low cost solution should be implemented as quickly as possible).

Rochester Airport

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.

T7a Do you agree with the proposed policy for aviation in Medway?

Agree

~~Disagree~~

T7b Please explain why you agree or disagree with the proposed policy for aviation in Medway

On the basis of impacts miigated.

T7c What alternative approach would you propose for planning policy for aviation in Medway?

n/a

Riverside Infrastructure

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.

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.

T8a Do you agree with the proposed policy for riverside infrastructure in Medway?

Agree

~~Disagree~~

T8b Please explain why you agree or disagree with the proposed policy for riverside infrastructure in Medway

n/a

T9a Do you consider the flexible approach to Chatham Docks to be appropriate?

Yes

~~No~~

T9b Please explain why you consider / don't consider the flexible approach to Chatham Docks to be appropriate

n/a

T10 What alternative approach would you propose for planning policy for riverside infrastructure in Medway?

n/a

Medway Riverside Path

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.

T11a Do you agree with the proposed policy for a riverside path in Medway?

Agree

Disagree

T11b Please explain why you agree or disagree with the proposed policy for a riverside path in Medway

But do not forget the River Thames!

T11c What alternative approach would you propose for planning policy in Medway?

n/a

Marinas and moorings

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.

T12a Do you agree with the proposed policy for marinas and moorings in Medway?

Agree

~~Disagree~~

T12b Please explain why you agree or disagree with the proposed policy for marinas and moorings in Medway

n/a

T12c What alternative approach would you propose?

n/a

Urban Logistics

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.

T13a Do you agree with the proposed policy for planning for logistics in Medway?

Agree

Disagree

T13b Please explain why you agree or disagree with the proposed policy for planning for logistics in Medway

It is not clear how the local road infrastructure would support this level of activity. Use of the railway, for inward and major outward delivery should be encouraged/enforced.

T13c 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. Please make any suggestions below:-

See above

T13d What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?

n/a

Connectivity and Permeability

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.

T14a Do you agree with the proposed policy for planning for connectivity in Medway?

Agree

~~Disagree~~

T14b Please explain why you agree or disagree with the proposed policy for planning for connectivity in Medway

n/a

T14c What alternative approach would you propose?

n/a

Vehicle Parking, Cycle parking and storage and Managing the transport impact of development

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

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.

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.

T15a Do you agree with the proposed policy approaches for managing the transport impacts of development and provision for parking?

Agree

Disagree

T15b Please explain why you agree or disagree with the proposed policy approaches for managing the transport impacts of development and provision for parking

Vehicle Parking – further development of this policy is required. There may be a need to exceed parking provision standards in some areas (especially rural villages where vehicle ownership is much higher than urban areas) and parking is causing problems for through traffic, especially emergency vehicles. There is also a growth in commercial vehicles operating from residential properties or ‘brought home’ to be parked up between jobs or return to work.

Support for Cycle Parking and Storage

Support policy for transport plans – but to include references to the Kent Community Rail Partnership for developments alongside the Medway Valley Line or any Hoo Peninsula Passenger Rail.

Support policy for vehicle crossovers.

The amount of development proposed (housing, economic development, public open space etc.) will mean large scale development until 2035 (and probably longer). During this there is likely to be considerable vehicle movement adding to the existing pressure on local roads and the environment (noise, dust, air quality and lighting). There will be a need for developers to conform to quality standards of development (although voluntary, should be enforced by planning condition where appropriate.

There should also be a body established by developers, the council or a private/public sector body to establish and run a local exchange for building materials (plant, equipment, materials and soils etc.) so that these items can be shared/re-allocated/re-used rather than sent to land fill or transported in and out of the area unnecessarily when needed locally – ultimate disposal if not used would remain with the generator of the material/item.

T15c 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?

Yes

~~No~~

T15d Please explain why you think it would / wouldn't be prudent to seek to manage this through planning policy

Implications and support for this may be identified early in any new development.

T15e What alternative approaches would you propose for policy in the new Medway Local Plan

n/a

Minerals, Waste and Energy

This section looks at how we need to plan for the sustainable supply of minerals, including wharves for importation of materials, how we plan for the management of waste and it also looks at planning for energy, renewables and supporting low carbon development.

Thinking about the minerals, waste and energy section of the Development Strategy, please answer the following question.

Q26 When developing the Local Plan what things do you think the council should consider to manage minerals, waste and energy within Medway whilst supporting regional and national demand?

n/a

There are technical questions asked about the following infrastructure policy approaches:-

- Minerals Supply, Land-won extraction of sands and gravels, Land-won minerals: chalk and clay, Minerals wharves and railheads and Minerals infrastructure
- Waste Management, New Waste Management Facilities, Existing Waste Management Facilities, Waste disposal to land and Waste Water Treatment Works
- Energy and Renewables and Low Carbon Development

Minerals

Policy MWE1: Minerals Supply

The council will plan for a steady and adequate supply of minerals by:

- Maintaining a 7-year landbank of permitted sand and gravel reserves;
- Supporting regional consideration and planning of minerals through its membership of the South East England Aggregates Working Party.

Policy MWE2: Land-won extraction of sands and gravels

Proposals for the extraction of sand and gravel will be permitted within the identified areas of search when:

- There is a proven need for the minerals to be extracted at that time in order for the council to maintain a 7-year landbank;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
 - o Exceptions will be considered when there are demonstrable overriding benefits that justify the development.

Policy MWE3: Land-won minerals: chalk and clay

Proposals for the extraction of land-won minerals will be permitted outside of the identified areas of search when:

- There is no adverse impact on sites designated for environmental or heritage significance;
- There is a proven need for the minerals to be extracted at that time;
- The site is not allocated for another use in the Local Plan;
- The site is located in an area that can accommodate the proposed development;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
- Exceptions will be considered when there are demonstrable overriding benefits that justify the development.

Policy MWE4: Minerals wharves and railheads

The identified minerals importation and distribution facilities that currently benefit from permanent planning permission will be safeguarded from development that would prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;

- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the importation or distribution facility can be made elsewhere in Medway.

Policy MWE5: Minerals infrastructure

Facilities for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material in Medway will be safeguarded from development that will prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;
- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the facility can be made elsewhere in Medway.

MWE1a Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway?

Yes

~~No~~

MWE1b Please explain why you think that the proposed policies MWE1-MWE5 do / don't represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway

n/a

MWE1c What do you consider would represent a sound alternative strategy for minerals planning in the Medway Local Plan?

n/a

Waste

Policy MWE6: Waste Management

All development should seek to minimise the generation of waste, having regard to the Waste Hierarchy.

The council will promote sustainable waste management within all new developments, ensuring that there is an appropriate provision for the separation, storage and collection of waste.

In order to help reduce waste through the development process, planning applications for major or strategic development¹⁹⁴ or those where significant levels of waste will be generated must include a waste management audit. The audit will be expected to show how waste is to be managed both through the construction period, including demolition and remediation, if appropriate; and that effective means of managing waste arising from the development are provided.

The council will continue to actively support regional consideration and the planning of waste management through its membership of the South East Waste Planning Advisory Group (SEWPAG), and with neighbouring Waste Planning Authorities on cross-border waste management issues and opportunities.

Policy MWE7: New Waste Management Facilities

The council will strive to maintain net self-sufficiency across each of the waste streams through permitting facilities for the reuse, recycling, treatment and transfer of waste materials, subject to their being of an appropriate environmental standard. Medway City Estate and Kingsnorth and, at a lesser scale, the existing established industrial estates are the preferred locations for such activities. The development of waste facilities outside of identified industrial areas will only be permitted where:

- There is no adverse impact on sites designated for environmental or heritage significance;
- The site is not allocated for other uses in the Local Plan;
- The site is located in an area that can accommodate the proposed development and does not have an unacceptable impact on amenity, the local environment and transport networks; and
- The site comprises brownfield land;
 - o Proposals on green field land will only be permitted where no alternative suitable brownfield sites can be identified.

Special consideration will be given to the development of waste management within existing established industrial estates that utilise existing rail facilities or the river Medway as a means of transportation.

Policy MWE8: Existing Waste Management Facilities

Existing waste management facilities that currently benefit from permanent planning permission will be safeguarded from development for non-waste management uses, unless;

- The proposed site is allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;

- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the waste management facility can be made elsewhere in Medway.

Policy MWE9: Waste disposal to land

Proposals for the creation of void space or land-raising to facilitate a disposal facility for non-inert or hazardous waste located within the areas referred to as the Disposal to Land Resource Areas on the Hoo Peninsula and Isle of Grain will be assessed against the following criteria:

- Impact of development on rural landscape character and local distinctiveness;
- Other local impacts, including on residential amenity, being acceptable;
- The site being well related to the primary road network and with suitable site access and egress arrangements, and that impacts on the transport network are acceptable. Opportunities for transport by rail and water are encouraged;
- It being clearly demonstrated that the material to be deposited cannot be reasonably disposed of in any other way (that is that they are irreducible residues);
- That the facility will handle a high proportion of such waste arising within Medway and the immediately surrounding area to ensure a sustainable pattern of disposal;
- Unless a specific needs case can be demonstrated, that wastes to be deposited do not involve a road haulage distance of more than 50 miles;
- That all the reasonable requirements of the Environment Agency can be satisfied; and
- There being a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site.

Policy MWE10: Waste Water Treatment Works

Proposals for the development of new, or the extension to existing waste water treatment works, sewage treatment and disposal facilities will be permitted in sustainable locations where there is a proven need for the proposed facility, and development does not conflict with the need to safeguard the environment and does not create unacceptable impacts on amenity.

MWE2a Do the proposed policies MWE6-MWE10 represent the most sustainable approach to managing Medway's waste?

Yes

~~No~~

MWE2b Please explain why you think that proposed policies MWE6-MWE10 do / don't represent the most sustainable approach to managing Medway's waste

n/a

MWE2c What do you consider would represent a sound alternative strategy for waste management in the Medway Local Plan?

n/a

Energy

Policy MWE11: Energy and Renewables

Proposals for energy developments, including any ancillary building or infrastructure, will be supported unless:

- the impact would compromise statutory designations where national planning policy restricts development;
- their scale, form, design, material and cumulative impacts is unacceptable to the local landscape or built environment, or loss of the best and most versatile agricultural land;
- any adverse impacts on the local community, economy, biodiversity or historic interests cannot be mitigated;

The council will consider the designation of defined areas for renewable energy technologies through a Local Landscape Character Assessment.

The council will actively promote the development of local supply chains and other associated employment opportunities.

The council will explore opportunities for Combined Heat and Power Systems connected to district heating networks.

Policy MWE12: Low Carbon Development

This policy seeks to implement an energy hierarchy by achieving energy efficiency first, before requiring the implementation of other forms of renewable energy generation on a larger scale.

Developers are required to follow the hierarchical approach set out below in achieving the energy and carbon dioxide emission requirements of the Building Regulations for all new residential development. New non-residential development is encouraged to follow the same approach.

1. To improve energy efficiency through thermal and fabric performance improvement measures.
2. Provide on-site renewable energy generation or on-site connected heating, or Combined Heat and Power (CHP) technologies, or Combined Cooling, Heat and Power (CCHP) systems.
3. The remainder of the carbon reduction targets to meet the Building Regulations targets should be met through suitable additional measures.

Developers are encouraged to meet higher standards than those required nationally, and pursue additional low carbon or renewable energy generation measures where practicable.

Compliance with this policy approach is required to be demonstrated through design and access statements submitted with a planning application.

MWE3a Do the proposed policies MWE11- MWE12 represent the most sustainable approach to planning for energy in Medway?

Yes

~~No~~

MWE3b Please explain why you think that proposed policies MWE11- MWE12 do / don't represent the most sustainable approach to planning for energy in Medway

n/a

MWE3c What do you consider would represent a sound alternative strategy for energy in the Medway Local Plan?

n/a

The council is preparing a new Local Plan to set out how the area will develop to 2035. We are now consulting local people on how the plan will support the council's vision of 'growth for all'.

We want to hear from residents, businesses, local organisations, community and interest groups to help create the best possible version of Medway. So it is important you take this opportunity to have your say on how Medway should grow.

The consultation period is from Friday, 16 March 2018 until 5pm on Friday, 11 May 2018.

The plan will ensure the area has enough new homes, jobs, and infrastructure to support the expected population growth. It will also focus on preserving Medway's environment and heritage.

Our challenge is to do this in a way that achieves sustainable growth. We need to balance this with the need for homes, jobs and services while conserving our natural and historic environments.

Comprehensive details of how the area might look in coming years can be seen in the Development Strategy consultation document. An introduction to the council's proposed approach to growth in Medway has been published and summarises the four scenarios for how the area could develop.

How can I find out more?

The Development Strategy consultation document is not just about land for housing. The main Development Strategy document is a detailed technical report that sets out the issues Medway faces and draft policies on how we could best address them. It looks at a number of important themes:

- Housing
- Employment
- Retail and centres
- Natural Environment and Green Belt
- Built environment
- Health and communities
- Infrastructure
- Transport
- Minerals, waste and energy

You can find out more:-

Online

You can view the Development Strategy, supporting documents and new, detailed maps of all four scenarios on the council's website at: medway.gov.uk/futuremedway

We have also produced some further summary information about what the development proposals may mean for regeneration, a rural town on the Hoo Peninsula and wider growth in suburban and rural areas.

Links to each section of the Development Strategy are included throughout this consultation form.

Printed copies

You can view a copy of the main report at the reception desk of the council offices at Gun Wharf, public libraries and community hubs across Medway. You can find details of the locations and opening hours of these buildings at: medway.gov.uk. You can also use the public libraries to view the additional information on the council's website.

How can I make my views known?

If you would like to make comments on the proposals in the Development Strategy document, you must submit them in writing by 5pm on Friday 11 May 2018. You can respond in the following ways:

Online: Using this form

The consultation form is designed to allow you to make comments about each of the different things the council has to consider when developing the Local Plan.

For each section there is the opportunity to give your views, and if you wish, to answer the questions that are asked throughout the technical document.

Alternatively you can submit your response

By email: futuremedway@medway.gov.uk

By Post to:

Planning Policy Team

Regeneration, Culture, Environment and Transformation

Medway Council

Gun Wharf

Dock Road

Chatham

Kent ME4 4TR

Your comments and contact details

We will record all written comments as part of the process of preparing the new Local Plan. At the close of the consultation we will review all comments received, look at the key issues raised, and take these into account in working to the next stage of the draft.

All comments will be published on our website - personal details such as addresses of individuals will be removed. We will keep your details on our records and keep you informed about further work on the Local Plan.

We will not share your details, or use them for any other purposes. The responses and contact details will be kept as part of the formal record of the preparation of the Local Plan. This will be for a minimum of five years.

Medway Council will keep the information provided above as confidential. Access to, retention and disposal of this information will be strictly in accordance with data protection requirements. Your personal data will be processed in accordance with Medway Council's Data Protection notice.

If you do not wish to be informed about the work on the Medway Local Plan, please tick here.

Full Name **Chris Fribbins (Railfuture)**

Email Address c

Address

Type of Consultee - please select the option that best describes you

National/Local Rail Advocate

Planning positively for Medway's successful future

Growth for all

The council's vision is to achieve 'growth for all' to make Medway an excellent place to live, work, learn and visit.

Medway's population has grown by more than 10,000 people since 2012 to 278,542 in 2016. By 2035 our population could be more than 330,000 people. If we do not plan properly for our growing and changing population there will be greater pressures on:

- Housing - the council knows Medway needs 29,500 new homes by 2035. A government formula may mean this figure goes up to 37,000. We need to identify a housing target for the plan.
- Local services, such as schools and health centres.
- Growth in the local economy- this will be held back and if we do not plan for growth, development will happen on a piecemeal basis.

We also need to promote development that will help to:

- Boost our local economy
- Improve the health of residents
- Address decline in town centres
- Provide new services and infrastructure
- Create a flourishing and attractive environment

Planning positively for Medway's successful future

Medway is a complex and diverse area. A large urban area has grown up between the river and the Kent Downs. There are wide tracts of remote countryside, strategic industrial, energy and transport facilities and good quality farmland. A third of land is of international or national importance for wildlife.

The Local Plan sets out a vision for Medway in 2035 as a leading university waterfront city of 330,000 people, noted for its revitalised urban centres and its stunning natural and historic assets and countryside. It sets ambitions for:

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

You can find out more in the Vision and Strategic Objectives for Medway in 2035 section of the consultation document.

Development strategy

The development strategy section outlines the approach taken to planning for the area's growth, across urban, suburban and rural areas, and sets out four alternative approaches to how Medway could grow to meet the aims of the Local Plan. The council has no preferred option at this stage.

We are approaching growth plans in the following way:-

1. Promoting the regeneration of urban waterfront and town centres

The Local Plan vision places regeneration at the heart of Medway's development strategy.

Regeneration of existing areas is a priority of the Medway strategy for growth. We continue to transform our urban waterfront and bring forward rejuvenation and improvements in some of the town centres.

The redevelopment of underused sites along the urban waterfronts and centres makes the best use of brownfield land and provides opportunities for homes, jobs, services, community and leisure activities and new public spaces.

The council has set out its ambitions for regeneration in our vision document Medway 2035, which promotes a successful economy and growth with benefits for all. You can find this document online

As well as the regeneration of the urban waterfront sites, the plan also promotes opportunities for new development in parts of town centres. This could include new housing, boosting the number of people living in the centres and supporting local shops, services and restaurants. New businesses could be attracted to sites near the town centres.

2. A rural town on the Hoo Peninsula

Local people have told us that they are concerned about pressures on infrastructure. They want to see new housing supported by upgrades to local services and facilities. The council has responded by looking at what growth options give the best scope for improvements in infrastructure. We consider that focusing growth into a small rural town around Hoo St Werburgh would bring these opportunities for new infrastructure. Development of new employment sites as part of the rural town, and nearby sites at Kingsnorth, could help to boost the area's economy.

As well as a mix of housing types, a rural town could provide new country parks, schools, leisure centre, health facilities, new jobs and shops. New transport links could include the opening of a passenger rail service on the Hoo Peninsula. The rural location demands the greatest care in planning for growth to respect the special qualities of the environment and to keep a rural character.

3. Wider growth

A mix of smaller sites in suburban areas, around Rainham and Capstone and other villages, are proposed to provide a range of housing sites. These are of a smaller scale, reflecting difficulties in addressing infrastructure and environmental issues.

The council wants to avoid unchecked growth of the suburbs, which could undermine our ambitions to revitalise town centres and lead to more car based travel. We will also continue to resist inappropriate development in the Green Belt to the west of Medway.

Development strategy

Development scenarios

Each of the four scenarios has a map showing potential developments, you can see where these potential developments are by clicking the link in the descriptions below. The four scenarios all share these common elements.

Homes will be supported by:

- New and expanded schools
- Health facilities
- Leisure and community centres
- Transport upgrades
- Riverside walks
- Parks and play areas

The growth around Hoo would include two new country parks, employment areas, new shops and services, and transport links and services.

Scenario 1: Meeting the housing need of 29,500 homes

Scenario 1 is based on the council's analysis of the number of homes needed to support the area's population growth and change up to 2035. The strategy seeks to firstly direct growth to brownfield regeneration sites. About half of the growth would take place on urban sites where we can make the best use of land. A rural town and some village expansions on the Hoo Peninsula would provide for the improvements in infrastructure to support a wide mix of development. These areas could meet over a third of the growth needed. About a sixth of development would be spread across sites in suburban areas and smaller villages.

It does not involve development on land designated for its environmental importance at Lodge Hill. There would be some buffers of undeveloped land next to these protected areas.

This scenario could deliver about 16,500 new homes on the sites identified in the map. Given the existing 'pipeline' of development, and windfall sites not identified on specific sites, a total of 29,950 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 9,318 homes

Suburban sites: 4,528 homes

Scenario 2: Investment in infrastructure to unlock growth

Scenario 2 - Growth of a rural town on the Hoo Peninsula is dependent on new infrastructure and services. The council is working to secure major funding to upgrade transport and other services in the area. This includes the potential use of the Grain freight railway line on the Hoo Peninsula for passenger services. If we were successful in getting a new train service for the area, this could open up opportunities for new jobs and different approaches to design. We could develop at higher densities in specific locations that are well connected to a new station.

The higher and faster rates of housing delivery in this scenario would reduce the need to release land in some suburban locations. Over 40% of growth would be on the Hoo Peninsula. In comparison with Scenario 1, this would remove land in the Capstone Valley and to the north of Rainham from proposed development allocations.

The higher density rates would boost the number of homes that could be built in the area. This scenario could deliver about 17,500 new homes on the sites identified in the map above. Given the existing 'pipeline' of development and windfall sites, a total of about 31,000 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 11,750 homes

Suburban sites: 3,179 homes

Scenario 3: Meeting government's target of local housing need of 37,000 homes

Scenario 3 - The council has looked at options for how we could reach such a large increase in the land needed for housing to meet the government's target. However, the Local Plan is not just about housing but balanced growth. To find more land for housing we would need to see more of the potential regeneration sites come forward for development. This could include the loss of some employment sites for housing developments. We would also need to release more land in suburban locations, such as to the east of Rainham, and this would make up about a fifth of total growth.

This scenario could deliver about 22,500 new homes on the sites identified in the map above. Given the existing 'pipeline' of development and windfall sites, a total of 35,960 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 14,194 homes

Hoo Peninsula: 12,162 homes

Suburban sites: 6,276 homes

This scenario involves much higher levels of growth in all areas, and would need careful planning and substantial funding of service improvements to deliver sustainable development.

Scenario 4: Consideration of development within Lodge Hill SSSI

Scenario 4 -Previous stages of consultation on the Medway Local Plan referred to the possible use of land at Lodge Hill for a new settlement on the Hoo Peninsula. This involved development on land designated as Site of Special Scientific Interest (SSSI) for its environmental importance. The proposal related to a planning application, which has now been withdrawn. Homes England, the government's regeneration agency, now owns the site. It is preparing a new planning application for a smaller scheme for up to 2000 homes with supporting services. Some of the development would involve building on the SSSI land. Homes England is proposing a scheme where the majority of land would be protected from development. This would include land managed for nature conservation and some new public open space. Development would provide homes as well as the funding to remove unexploded ordnance and manage other land for nature conservation.

The additional land at Lodge Hill would remove the need to allocate some land for development in Stoke and in the Capstone Valley.

This scenario could deliver around 17,000 new homes on the sites identified in the map above. Given the existing 'pipeline' of development including windfall sites, a total of 30,500 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 10,357 homes

Suburban sites: 4,108 homes

Development strategy

Q1 Thinking about our approach, the scenarios and the development strategy section, please answer the following question.

When developing the Local Plan what things do you think the council should consider about the scale of the development needed to support Medway's growth and provide sustainable development?

While accepting the existing growth in population of the Medway Towns there appears to be insufficient consideration of the existing issues for local residents or the pressures that this would bring to the area. There has been a focus on new housing figures by government without an assessment of the local constraints and issues that need to be addressed. Major infrastructure delivery will be required – and the plan does not indicate how this will be delivered, or the constraints on development if it is not.

There are technical questions asked about the following development strategy policy approaches:-

- Sustainable Development
- Spatial Development Strategy

Development strategy

Policy DS1: Sustainable Development

The purpose of planning is to achieve sustainable development. When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Planning applications that are in conformity with the Medway Local Plan (and where applicable, with policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date, the council will grant permission, unless material considerations indicate otherwise, and considering whether:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in the NPPF indicate that development should be restricted.

Policy DS2: Spatial Development Strategy

The council will seek to meet the development needs for homes, employment and retail land, infrastructure and services, as determined by the evidence base set out in the Medway Local Plan, whilst respecting the need to conserve and enhance the natural and built environment.

The development strategy for Medway prioritises regeneration, making the best use of underused and previously developed land and directing investment to urban waterfront and centre opportunity areas. The council will encourage sustainable development in appropriate urban regeneration sites to deliver housing, employment, retail and community uses, establishing a quality and accessible public realm, including the extension of a riverside walk. Chatham will provide the focus for new retail and community facilities. Appropriate opportunities to capitalise upon the learning quarter at Chatham Maritime will be positively considered.

Outside of the regeneration areas, the council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting and supported by significant infrastructure investments. The development will be in accordance with a masterplan, to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to a range of services and infrastructure.

The council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.

Strategic green infrastructure zones throughout urban and rural Medway will promote a natural capital approach, and secure benefits for nature and people and provide separation of settlements.

DS1a Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

Yes

No

DS1b Please explain why you think proposed spatial development strategy does / doesn't represent the most sustainable approach to managing Medway's growth

By failing to identify the specific infrastructure interventions that would be required to support a small town at Hoo St Werburgh, elsewhere on the Hoo Peninsula and their delivery, there cannot be any assurance that the proposed scale of development is sustainable.

There are already concerns about the capacity road system (A228/Four Elms Roundabout/A289 Bypass/Frindsbury Hill) to support the housing that has already been approved and the additional housing numbers (although site allocations have to be assumed as they are not published) as well as commercial developments that are already taking place and assumed as part of the plan).

DS1c What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

A more detailed infrastructure plan is required (and a master plan of the Hoo St Werburgh small town with connections to the other local villages).

Housing

This section provides details of Medway's housing need, with a main Housing Delivery policy and nine supporting housing policies to help get the right mix of housing required in Medway to accommodate a growing population with diverse needs.

Q2 Thinking about the Housing section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's housing needs?

Infrastructure – especially highways peak capacity issues at the A228/A289 roundabouts (Sans Pareil and Four Elms, Health and specific Education facilities need to be addressed before the level of housing can be assessed as sustainable.

There are technical questions asked about the following housing policy approaches:-

- Housing Delivery
- Housing Mix
- Affordable Housing
- Supported Housing, Nursing Homes and Older Persons Accommodation
- Student Accommodation
- Mobile Home Parks
- Houseboats
- Houses of Multiple Occupation (HMOs)
- Self-build and Custom Housebuilding
- Gypsy, Traveller and Travelling Showpersons

Housing Delivery

Policy H1: Housing Delivery

The council will determine a housing target for the Medway Local Plan, responding to the latest relevant information, in preparing its draft Local Plan.

The council will seek to provide a supply of land 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.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.

Development of a strategic allocation for a rural town on the Hoo Peninsula will be in accordance with the council's development framework for Hoo.

H1a Does the proposed policy for housing delivery represent a sound approach?

~~Yes~~

No

H1b Please explain why you do / don't think the proposed policy for housing delivery represent a sound approach

The policy cannot be fully assessed without the Masterplans, coordination of infrastructure and service provision. The idea of a small town at Hoo St Werburgh was part of the 2017 consultation on the Development Strategy but the provision of services appears to have regressed with no land use allocation for a significant health facility on the western side of the River Medway, or schools (both which would have significant additional pressures on the local road network). Allocation of specific sites (as proposed in this consultation) is flawed without more detail on the infrastructure interventions.

The consultation is also not up to date with significant, recent, housing developments included in the consultation and already creating infrastructure demands and other pressures (especially around Hoo and Chattenden)

H1c Would you suggest an alternative approach?

A more detailed investigation into the capacity of the Hoo Peninsula and Town Centre sites is required as well as Masterplans and Infrastructure needs before this level of development can be accepted as sustainable.

Housing Mix

Policy H2: Housing Mix

The council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population.

Residential development will be permitted to encourage a sustainable mix of market housing to include an appropriate range of house types and size to address local requirements.

The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

Accommodation requirements as detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform which house sizes and mix should be delivered in urban and rural areas to meet the objectively assessed needs of the area.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council's housing register and discuss affordable housing requirements with the council's Housing Strategy team at the pre-submission stage of the planning process.

Large development schemes meeting the criteria set out at Policy H9, must demonstrate that sufficient consideration has been given to custom and self-build plots as part of housing mix.

The council will work with partners to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people.

Gypsy, Traveller and Travelling Showpeople accommodation requirements will form part of the borough's need for housing.

H2a Does the proposed policy for housing mix represent a sound approach?

~~Yes~~

No

H2b Please explain why you do / don't think the proposed policy for housing mix represent a sound approach.

H2c Would you suggest an alternative approach?

More recognition of local community needs (especially in parished areas).

Affordable Housing

Policy H3: Affordable Housing

On housing and mixed use development sites of 15 or more residential units the council will require the delivery of affordable housing.

The council will apply the following requirements for affordable housing provision:

- in rural Medway 30% of all residential units for developments of 15 or more dwellings
- in urban Medway 25% of all residential units for developments of 15 or more dwellings

Provision must be in accordance with the council's Guide to Developer Contributions and Obligations.

There will be a strong presumption in favour of the affordable homes being fully integrated within the proposed development. However the council may consider off site provision, where this enables other policy objectives to be met, subject to an equivalent level of developer contribution being provided.

Where affordable housing is to be provided offsite, the council's preferred position is for developers to directly providing affordable dwellings on an alternative site. Only where it can be demonstrated that this can not be provided, would the council consider a financial contribution from the developer which would enable provision through new build on an alternative site.

H3a Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision?

n/a

H3b Please explain why you agree / disagree with threshold for contributions for affordable housing and the percentage requirements for its provision.

Caution must be exercised where developers agree an allocation, but then return to argue that the economics of the scheme have changed.

H3c What do you consider would represent an effective alternative approach?

H4 What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

This needs to be driven by more local needs. Schemes to lock in the low cost/affordable element should be given priority (perhaps providing technical and admin support to local communities, especially parish councils) to provide these.

Supported Housing, Nursing Homes and Older Persons Accommodation

Policy H4: Supported Housing, Nursing Homes and Older Persons Accommodation

The development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:

- Meets a proven need for that particular type of accommodation.
- Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs.
- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.
- Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.

Loss of specialist housing will be permitted only where it is demonstrated that there is no need for the form of accommodation.

H5a Do you agree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?

n/a

H5b Please explain why you agree or disagree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation.

The only concern is the loss of this form of specialist housing in recent years and the need to provide extra to cover the shortfall.

H6a Do you consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs?

n/a

H6b Please explain why you do / don't consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs

Although there is a place for retirement villages etc. they should be integrated with the local community – perhaps through the development of facilities shared with the local community.

H7a Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme?

n/a

H7b Please explain why you do / don't consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme

n/a

Student Accommodation

Policy H5: Student Accommodation

The council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.

Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need.

The council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, and does not have a negative impact on the core functions of the town centres, and is consistent with strategic redevelopment plans.

These locations must be well served by public transport and accessible to a wide range of town centre, leisure and community uses.

Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land or leisure or community space.

Student housing will be required to provide a high quality living environment and include a range of unit sizes and layouts with and without shared facilities to meet requirements of the educational institutions they serve.

H8a Do you agree with the proposed policy for student accommodation?

n/a

H8b Please explain why you agree or disagree with the proposed policy for student accommodation.

Student accommodation can be very supportive of the town centre economy.

H8c Would you propose an alternative approach?

n/a

Mobile Home Parks

Policy H6: Mobile Home Parks

Proposals for mobile or park home developments will be given the same consideration as other dwellings and will be subject to the same compliance with planning policy in assessing impact and sustainability.

The council seeks to protect existing parks from competing uses, but restrict their expansion outside designated areas. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area particularly those near areas of sensitive environmental interests.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home Park, or a reduction in the area available for their use will not be permitted.

The council will set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

Any proposals for updates or intensification must have careful consideration for the colour, massing and materials used, incorporate appropriate landscaping and have no adverse impact on the character of the locality or amenity of nearby residents.

H9a Do you agree with the proposed policy for mobile home parks?

n/a

H9b Please explain why you agree or disagree with the proposed policy for mobile home parks.

n/a

H9c Would you propose an alternative approach?

n/a

Houseboats

Policy H7: Houseboats

The council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim:

- To protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place.
- To specify criteria under which any further growth of houseboats will be allowed in order to minimise impact.
- To seek the removal and disposal of any vessel so moored if a boat sinks, or becomes unfit for habitation, derelict, or is otherwise abandoned.
- To seek opportunities to deliver improvements that benefit the local amenity and environment.

H10a Do you agree with the proposed policy for houseboats?

n/a

H10b Please explain why you agree or disagree with the proposed policy for houseboats

n/a

H10c Would you propose an alternative approach?

n/a

Houses of Multiple Occupation (HMOs)

Policy H8: Houses of multiple occupation

The council seeks to avoid detrimental over concentrations of HMOs. Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where they:

- Do not adversely affect the character and amenity of the area, or the supply of family housing.
- Do not contribute to the over concentration of HMOs in a particular area.
- Do not contribute to the generation of excessive parking demands or traffic in an area.
- Make appropriate provision for the storage of waste

H11a Do you agree with the policy approach for HMOs?

n/a

H11b Please explain why you agree or disagree with the policy approach for HMOs.

n/a

H12a Do you consider that the council should set locational criteria for HMOs, such as consideration neighbouring uses and proximity to other HMOs?

Yes

~~No~~

H12b Please explain why you agree or disagree that the council should set locational criteria for HMOs.

n/a

H13a Should the council make use of Article 4 Directions to restrict the ability to convert properties to HMOs?

Yes

~~No~~

H13b Please explain why you agree or disagree that the council should make use of Article 4 Directions to restrict the ability to convert properties to HMOs

n/a

Self-build and Custom Housebuilding

Policy H9: Self-build and Custom Housebuilding

The council will support self-build or custom build home development in sustainable and suitable locations.

To identify and provide for people who wish to build their own home, the council will maintain a register of interested parties and report the headline data annually on the council website after the end of each base period.

All new self-build/custom housebuilding applications

- Applicants will need to have regard to the local landscape and guidance from other relevant Local Plan policies in the same way that other types of residential applications do; this will ensure all types of new development are of high quality.
- If the number of self build plots on a single site exceeds 10, then a design code framework should be agreed with the council prior to the submission of individual planning applications. This will ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality.
- In accordance with Government guidance on Self-Build and Custom Housebuilding, the plots must be serviced (have access to a public highway and connections for electricity, water and waste water) or, in the opinion of a relevant authority, can be provided with access to those things within the duration of a development permission granted in relation to that land.
- Where a land owner has a suitable small site that they wish to obtain speculative outline residential permission for, they are encouraged to consider the plot for self-build or custom housebuilding, depending on the local demand.

Expanding/intensifying existing residential permissions

Where there is an existing residential permission and the developer approaches the council seeking to expand/intensify the development, the developer should demonstrate that they have considered some/all of the additional plots to be provided as serviced self/custom build plots, where there is identified demand.

Neighbourhood Plans

The council supports the consideration of self-build and custom housebuilding in the preparation of Neighbourhood Plans, and joint working with Neighbourhood Plan groups to establish a locally derived design code.

Council owned land and Regeneration

The council will consider opportunities for self-build housing in disposal of Council land and in promoting regeneration schemes.

H14a Do you agree with the self build and custom housebuilding approaches taken above?

n/a

H14b Please explain why you agree or disagree with the self build and custom housebuilding approaches taken above

n/a

Self-build and Custom Housebuilding

Self Build Site Allocations

In considering site suitability, some sites have been identified from the Strategic Land Availability Assessment (SLAA) as having potential for self build and/or custom housebuilding use. Some of the larger sites may have potential for a proportion of the area to be suitable for self/custom build. The Council may seek to secure planning permission on any sites allocated for self/custom build by way of Local Development Orders after the Local Plan is adopted.

H15a Do you think that the council should allocate specific sites for self/custom housebuilding development?

n/a

H15b Please explain why you agree or disagree that the council should allocate specific sites for self/custom housebuilding development.

n/a

If we do allocate self/custom build sites, we will advertise them on our website. The land owner would also be expected to market the site. When allocating a site/part of a site for self/custom build, it is important that there is realistic expectation of interest in the site. However, due to circumstances out of the control of the council and land owner, the site may not receive the interest that had been anticipated. We therefore propose that once an allocated site has sold and built out a certain proportion of the self build plots, if the land owner is unable to sell the remaining plots after marketing them for a further period of time (to the satisfaction of the council), they will then be allowed to firstly offer the plot(s) to the council/housing association, before being allowed to build out on the plot themselves or sell to a non self/custom builder/developer.

n/a

H16b Please explain why you agree or disagree with the approach set above

n/a

H16d After what further period of time of unsuccessful marketing do you feel it would be acceptable to offer the remaining plots on to the council/housing association or other non self/custom builders?

n/a

Self-build and Custom Housebuilding

Sites over 400 dwellings

In order to satisfy the demand from the register, we propose that applications on sites over a certain number of dwellings should make available at least 5% of the plots to self/custom builders for purchase. We suggest a threshold of 400 dwellings and over. The developer will need to provide robust evidence to demonstrate if this is not economically viable. This would apply to applications on new Local Plan housing allocations or windfall sites.

H17a Do you agree that sites over a certain size should offer a percentage of the plots to self/custom builders?

n/a

H17b Please explain why you agree or disagree that sites over a certain size should offer a percentage of the plots to self/custom builders

n/a

Following on from the question above, if a plot has been marketed (to the satisfaction of the council) for 12 months and not sold, we propose that it can then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market.

H18a Do you agree with this approach outlined above?

n/a

H18b Please explain why you agree or disagree with this approach

n/a

With regards to these large sites of 400 dwellings or over, in order to prevent the completion of the overall site from being drawn out, exposing existing residents to extended periods of construction by their neighbours, we propose that if a plot is purchased by a self or custom builder, the dwelling must be built within 3 years of the date of sale, before being offered to other applicants on the self build register to purchase. If there is no interest, then it may then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. The onus would be on the developer to advise the council when each plot had been sold in order to monitor the development.

H19a Do you agree with this approach outlined above?

n/a

H19b Please explain why you agree or disagree with this approach

n/a

Gypsy and Traveller Accommodation

Policy H10: Gypsy, Traveller and Travelling Showpersons

Safeguarding Existing Sites

Existing permanent authorised gypsy and traveller sites and sites for travelling showpeople will be retained, unless:

- There is a surplus of available accommodation over and above the required five year supply of sites, or,
- The site will be replaced by a site of similar proportions in an appropriate location which complies with the criteria listed below for new sites, or,
- A site has been granted a personalised permission restricting residency to a named occupier or family.

New Sites

Proposals for new gypsy, traveller and travelling showperson sites (temporary or permanent) will be permitted, in accordance with the council's planning policies if they meet the following criteria:

- Need – the council is satisfied that there is a clear need for the site and the proposal cannot be met on existing available sites or an allocated site
- Location – within an accessible walking distance to local facilities for education, healthcare, and convenience retailing.
- Not located in the Green Belt, flood risk zones 2 & 3, areas covered by landscape or environmental designations (AONBs, SSSI, Ramsar, SPA, SACs, Ancient Woodland or local nature reserves), protected open spaces or protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas), or the best and most versatile agricultural land, of Grades 1, 2 or 3a).
- Scale – a site should respect its location and surrounding environment and be embedded within it and not intrude onto the landscape. The council will require a landscape strategy as part of the application to confirm the details of this.
- Pitches and plots should be of a sufficient size and, on sites for Travelling Showpeople have space for adequate storage.
- Access – there is safe and convenient pedestrian and vehicular access to the public highway, with adequate space on site for vehicle turning and parking

H20a Does this represent a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs?

n/a

H20b Please explain why you agree or disagree that this is a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs

n/a

H21a Do you consider that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan?

n/a

H21b Please explain why you agree or disagree that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan

n/a

Employment

This section sets the context of Medway's economy, with details of land needed for employment sites, and how we can boost the local economy, particularly in securing better quality jobs and benefiting from links with our universities and colleges. These inform the main 'economic development' policy and Medway's key economic sectors including the rural economy and tourism including associated visitor needs.

Q5 Thinking about the employment section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's economic needs?

The infrastructure needs, especially transport will be key to meeting economic needs. The needs of the wider area will also contribute to a positive environment for economic development.

There are technical questions asked about the following employment policy approaches:-

- Economic Development
- Rural Economy
- Tourism
- Visitor Accommodation

Economic Development

Policy E1: Economic Development

The council will seek to boost Medway's economic performance, securing a range of jobs for its workforce. The council will work positively with the local business community and major public sector employers, the Universities at Medway and further education providers, inward investors, strategic partnerships and neighbouring authorities to support sustainable economic growth and job creation.

The council will make provision in Medway for the scale, range, quality and locational requirements of employment land identified in the Employment Land Needs Assessment, 2015, or subsequent updated evidence. This will involve the safeguarding of sites, identification of redevelopment and investment opportunities, and allocations for new sites.

The plan will seek to increase the productivity of Medway's economy, as measured through GVA, through support for higher value employment. This will include the designation of specific employment sites as suitable for higher value employment. All planning applications for employment uses will be assessed for their GVA contributions and whether the proposed use is best aligned to the site characteristics and locational offer. The council and its partners will promote growth of employment sectors that have the best potential for higher value jobs.

The council will support actions to:

- Consolidate economic benefits from the regeneration programme in Medway, specifically seeking to strengthen the role of the town centres in providing wider job opportunities;
- Raise skills levels and provide apprenticeship and local labour opportunities;
- Realise opportunities for raising higher value employment through supporting the development of the Universities at Medway and the wider learning quarter, and linking to growth in the wider economy;
- Seek to accrue benefits for Medway's economy from strategic developments of infrastructure, housing and employment sites outside of the borough;
- Explore the extension of the successful Medway Innovation Centre model to provide additional serviced employment space for businesses;
- Seek the installation and upgrade of high speed broadband services in employment sites;
- Promote the diversification of Medway's economic base; and
- Secure sustainable employment uses for the strategic sites at Grain and Kingsnorth, achieving value from the specific location offer and the access to water and rail for freight movements, and realising opportunities for manufacturing of modern modular construction facilities.

E1a Do you consider that this is an effective approach to securing and strengthening Medway's economy?

Yes

No

E1b Please explain why you think that this is / is not an effective approach to securing and strengthening Medway's economy

It is relatively easy to allocate employment land, but difficult to fill (some of the site identified have been identified for decades but remain undeveloped).

An approach to assess the impact on local infrastructure needs, environmental and landscape impacts needs to be enhanced and incorporated with other pressures. There may also be pressure on schools/nurseries and employees seek provision close to their place of work.

E2 Which locations do you consider are the most appropriate for employment growth?

n/a

E3a Do you agree with the proposed approach to assessing GVA with planning applications for employment uses?

n/a

E3b Please explain why you agree or disagree with the proposed approach to assessing GVA with planning applications for employment uses

n/a

E4a Do you support the proposed approach for higher value jobs in Medway?

n/a

E4b Please explain why you support / do not support the proposed approach for higher value jobs in Medway

n/a

E5a Do you consider that there is demand for further serviced office accommodation in Medway?

n/a

E5b Please explain why you consider / do not consider that there is demand for further serviced office accommodation in Medway

n/a

Rural Economy

Policy E2: Rural Economy

The council will support the land based sector in Medway, through seeking to direct development to land of lesser agricultural land, where feasible, and promoting the sustainable development and diversification of farming and other land based rural businesses, where the proposals can demonstrate positive benefits and do not conflict with other policies in the Local Plan. The council will define countryside areas outside of the urban and village settlement boundaries, where the land based economy will be supported providing that it does not conflict with requirements to conserve and enhance the environment.

The council will support the growth of rural businesses in well-designed development in appropriate locations that respect the character of the countryside and environmental features. Sustainable rural tourism and leisure activities that are in keeping with their rural setting will be supported.

The council will seek the retention of key rural services and facilities to promote sustainable villages, providing for the needs of rural residents.

E6a Do you agree with the proposed policy approach for the rural economy?

n/a

E6b Please explain why you agree / disagree with the proposed policy approach for the rural economy

Access to rail will provide welcome support to the Rural Economy

E6c What alternative approaches would you propose?

n/a

Tourism

Policy E3: Tourism

The council will positively promote sustainable tourism development that can make a positive contribution to Medway's economy and cultural life. Appropriate proposals for the development of tourism facilities and visitor accommodation will be supported where they meet the principles of sustainable development.

Tourism developments that can contribute positively to the regeneration of Medway, consistent with the council's vision, and extend the cultural offer will be considered favourably. Opportunities for development to enhance the vibrancy and vitality of town centres will be welcomed.

The enhancement of cultural assets and visitor facilities will be supported, where they respect the integrity of the surrounding area, particularly those assets associated with the local historic environment.

Opportunities to support the development of rural and marine based tourism will be welcomed, where they can demonstrate that negative impacts on the environment can be avoided.

Proposals for tourism facilities will be assessed against the principles below:

- Identified need for creation, expansion or improvement of tourism facilities.
- The proposal is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment.
- Maximises opportunities for sustainable travel.

E7a Do you agree with the proposed policy approach towards tourism?

Agree

~~Disagree~~

E7b Please explain why you agree or disagree with the proposed policy approach towards tourism

There is scope for developing tourism in the rural areas, but there does need to be some assessment and management of impacts to the environment and infrastructure – access to Rail is also key.

E7c Would you suggest an alternative policy approach?

n/a

Visitor Accommodation

Policy E4: Visitor accommodation

The retention and provision of visitor accommodation is encouraged in accordance with the principles set out below:

- Where it meets a proven need, particularly those sectors of the market where evidence indicates unmet demand, such as a high quality boutique hotel in Rochester, and quality rural self-catering accommodation.
- Development enhances the quality and offer of existing visitor accommodation and its setting.
- Where the proposal contributes to the vibrancy, vitality and viability of town centres and the sustainability of wider settlements.
- Where the proposal avoids negative impacts on the environment, is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment, avoids siting in areas of high flood risk and intrusion into the landscapes of open countryside.
- Maximises opportunities for sustainable travel in accessible locations and minimises traffic generation.

E8a Do you agree with the proposed policy approach towards visitor accommodation?

n/a

E8b Please explain why you agree or disagree with the proposed policy approach for visitor accommodation

n/a

E8c Would you suggest an alternative policy approach?

n/a

Retail and Town Centres

This section provides details of Medway's retail strategy, and considers the relationship between Medway's town centres and out of centre retail locations and retail parks. There is associated policy guidance to support and strengthen our town centres, neighbourhood and village centres and considering how Medway needs to respond to the major changes that have been taking place in shopping patterns over recent years.

Q8 Thinking about the retail and town centres section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?

There are technical questions asked about the following retail and town centre policy approaches:-

- Retail Hierarchy
- Sequential Assessment
- Impact Assessments
- Role, Function and management of uses in centres – Frontage
- Temporary uses
- Supporting Sustainable and Healthy centres
- Hempstead Valley District Centre
- Dockside
- Medway Valley Leisure Park
- Healthy sustainable communities
- Local Centres and shopping parades
- Retail Parks

Retail and Town Centres

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Q8 Thinking about the retail and town centres section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?

It will be important to assess the impact of retail and town centres on each other and ensure transport infrastructure is available to satisfy those needs.

There are technical questions asked about the following retail and town centre policy approaches:-

- Retail Hierarchy
- Sequential Assessment
- Impact Assessments
- Role, Function and management of uses in centres – Frontage
- Temporary uses
- Supporting Sustainable and Healthy centres
- Hempstead Valley District Centre
- Dockside
- Medway Valley Leisure Park
- Healthy sustainable communities
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Retail Hierarchy

Policy RTC1: Retail hierarchy

The function of centres as multi-purpose destinations and the main locations for retail, community, leisure and employment will continue to be supported in relation to their individual role and scale. Chatham is the primary centre at the top of the hierarchy and will be the focus for the majority of comparison retail to meet the strategic needs for the authority and maintain its role in the hierarchy.

Medway's hierarchy of centres is:

I. Principal Town Centre: Chatham is the main location for comparison retail, community uses, leisure, culture and tourism (in support of local heritage assets and cultural focus).

II. District Centres: The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres: Strood, Gillingham, Rainham, Rochester, Hempstead Valley.

III. Local Centres: The authority seeks to maintain the sustainably accessed local top up shopping offer and to satisfy the day-to day needs of the local population.

New local centres or shopping parades compliant with the council's retail policies may be required in the following locations depending on the defined development strategy and proposals maps in the Local Plan, the scale of the proposal.

- Hoo St Werburgh rural town
- Rainham East
- Capstone

Proposals will need to be supported by a robust justification talking into account the existing provision, character and scale of the area and the demographics.

RTC1a Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway?

n/a

RTC1b Please explain why you consider / don't consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway

n/a

RTC2a Do you agree with the definition of Chatham as the primary centre at the top of the hierarchy?

n/a

Disagree

RTC2b Please explain why you agree or disagree with the definition of Chatham as the primary centre at the top of the hierarchy

n/a

RTC3a Do you agree with the identified district centres?

n/a

RTC3b Please explain why you agree or disagree with the identified district centres

n/a

RTC4 How do you consider that Dockside should be recognised in Medway's retail hierarchy?

n/a

RTC5 Would you propose any alternative approaches to Medway's retail hierarchy?

n/a

Sequential Assessment

Policy RTC2: Sequential Assessment

Main town centre uses are directed to Medway's centres as identified in policy RTC1.

Proposals to locate or expand main town centre uses outside of defined centres, and where not in accordance with any part of the retail and main town centre uses strategy in the development plan, are required to demonstrate through a sequential assessment, within an agreed and defined catchment area, that there are no sequentially preferable sites available in accordance with the following sequence:

I. Chatham

II. Strood, Gillingham, Rainham, Rochester

III. Hempstead Valley Shopping Centre

IV. Local centre or edge of centre, whichever is better connected and able to support 1, 2 or 3 listed above

V. Out of centre

When considering sequentially preferable edge and out of centre sites, following demonstration of the unavailability of more central sites, preference will be given to edge and out of centre sites that are accessible and well connected to town centres respectively, i.e. consideration of edge of centre sites first.

The catchment area must be defined through discussions with the authority at the earliest opportunity and is dependent on the scale and type of the proposal and its ability to draw trade.

Large scale leisure proposals must be accessed by sustainable means, not have a negative impact on traffic and provide ease of access.

Proposals for ancillary development are required to be compliant with the policy set out above unless it can be:

- Justified as ancillary and necessary for the business operation;
- the type of use and scale of the proposal is secondary to the predominant/main use;
- demonstrated that there are dependencies between the proposal and the predominant/main use. Consideration will be given to the location of the proposal in relation to the predominant/main use;
- it may be necessary to manage the ancillary use through condition to maintain its secondary nature

The scale of the proposal may also require an impact assessment and therefore requires compliance with policy RTC3 where it meets the criteria.

RTC6a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

n/a

RTC6b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

n/a

RTC6c Do you agree with the proposed sequential approach?

n/a

RTC6d Please explain why you agree or disagree with the proposed sequential approach

n/a

RTC6e Would you propose alternative approaches?

n/a

Impact Assessments

Policy RTC3: Impact Assessments

Proposals that seek to locate or expand retail and other main town centre uses in edge or out of centre locations will be permitted where:

- a) it is supported by an impact assessment where proposals for comparison, convenience retail, or commercial leisure development exceeds a defined threshold set in the Local Plan; or other large scale leisure and office uses exceeds 2,500sqm.
- b) it is demonstrated that it would not have a significant adverse impact on:
 - Impact on the strategy - development, retail and main town centre uses strategy
 - Impact on vitality and viability of centres within the catchment of the proposal
 - Impact on existing, planned or committed town centre investment
 - Consideration is given to the cumulative impact of proposals considered relevant and to the health of centres

is given to the local context and the vulnerability of the authority's centres

- c) Where appropriate development proposals may be conditioned to reduce the impact on centres where there is an impact but is not considered significantly adverse to justify refusal.

RTC7a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

n/a

RTC7b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

n/a

RTC8a Do you agree with the proposed approach to impact assessments?

n/a

RTC8b Please explain why you agree or disagree with the proposed approach to impact assessments

n/a

RTC9a What do you consider would represent an appropriate size threshold for developments to undertake an impact assessment?

n/a

RTC9b Would you propose alternative approaches?

n/a

Role, Function and management of uses in centres – Frontage

Policy RTC4: Frontages

Proposals within frontages of centres must be in accordance with the council's design policies and:

- provide an active frontage at ground floor level, which is accessible and attractive to pedestrians. The presence of a larger proportion of show window space is required.
- be of appropriate scale, format, design and character reflective of the facades above ground floor, the centre's role and function and the Council's ambitions as set out in RTC1 and RTC5
- Protect and where possible enhance the public realm through well planned and coordinated planting, improvements to surfacing/paving and other environmental enhancements.
- Must demonstrate no harm to other neighbouring businesses, residential public and visual amenity through impacts such as noise, light, odour, late night activity, litter and general disturbance.
- Any proposals for shutters must maintain views into shops when closed, be back lit, powder coated and any housing should relate well to shop frontage and signage.

Policy RTC5: Role, Function and management of uses in centres – Frontage

The council seeks to establish a robust, vital and viable retail core in support of competitive, sustainable and healthy centres compliant with its retail policies. A mix of uses is supported with due consideration of avoiding an overprovision or concentration of the same type of uses.

Primary Frontage

Proposals for non-A1 uses within the primary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy provided the provision of A3 uses do not result in an over concentration in Rochester District Centre.

Where the proposal results in the loss of A1 premises, permission will be granted where:

- i. it is consistent with the policy above.
- ii. in all other cases the unit has remained vacant for at least 6 months and the applicant can demonstrate:
 - reasonable attempts were made without success to let the premises for A1 use;
 - that the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy of the centre.

Greater efficiency in the use of upper floors will be supported and encouraged.

Secondary Frontage

Proposals for non-A1 uses within the secondary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy and where provision of A3 uses does not result in over provision in Rochester district centre.

Where the proposal results in the proportion of A1 representation falling below the threshold defined by the council and/or results in the loss of A1, A3, D2, community and cultural uses, permission will be granted where:

- reasonable attempts were made without success to let the premises for the last use
- the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy.

RTC10a Do you agree that this proposed approach represents an effective approach to planning for the city and district centres in Medway?

n/a

RTC10b Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for the city and district centres in Medway

n/a

RTC11a Do you consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

n/a

RTC11b Please explain why you consider / don't consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f in the Development Strategy Document

n/a

RTC12a Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

Agree

~~Disagree~~

RTC12b Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f in the Development Strategy Document?

Yes

RTC13 Do you consider that there are alternative approaches to manage this aspect of Medway's main centres?

n/a

Temporary uses

Policy RTC6: Temporary uses

Proposals for a temporary use of vacant units within town and local centre frontages will be supported for a period of up to 6 months where compliant with the council's design and retail policies and:

- where the unit has been vacant for at least 2 months;
- where the proposed use makes a contribution to the vitality and viability of the centre;

Erection of structures for the operation of the business must be easily removable

Temporary permissions will only be renewed for a single additional period where:

- The original temporary permission was granted for a period of less than 4 months
- Reasonable attempts were made to let the premises without success
- The current temporary use can demonstrate benefit to the centre and success of business.

RTC14a Do you agree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway?

n/a

RTC14b Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway

n/a

RTC14c Would you propose alternative approaches?

n/a

Supporting Sustainable and Healthy Centres

RTC7: Supporting Sustainable and Healthy centres

Development proposals will help to create healthy and sustainable places, recognising the cumulative effect individual units and specific uses can have on the success of places.

The council will seek to manage the concentration and mix of specific premises to strengthen its centres and support healthier communities.

RTC15a Do you agree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area?

n/a

RTC15b Please explain why you agree or disagree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area

n/a

RTC16a The council considers such specific uses to include 'high energy density food' outlets, which sell foods high in fat and/or sugar; betting shops; gaming centres; and premises selling alcohol, particularly for off licence sales.

Do you agree with this definition?

n/a

RTC16b Please explain why you agree or disagree with the definition

n/a

RTC16c Do you think that the list should be amended?

n/a

RTC17a Do you think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above?

~~Yes~~

No

RTC17b Please explain why you think / don't think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above

n/a

RTC18a Do you think that such uses should be restricted near schools and youth facilities?

~~n/a~~

RTC18b Please explain why you think / don't think that such uses should be restricted near schools and youth facilities

n/a

RTC19a Do you think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis?

n/a

RTC19b Please explain why you think / don't think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis

n/a

Hempstead Valley District Centre

RTC8: Hempstead Valley District Centre

Hempstead Valley is different to the other traditional centres with high streets. The council recognises that it provides for local needs and therefore supports the modernisation and growth of this where supportive of this local function.

Further retail and leisure development, appropriate to the character and role of the centre will be supported, following a sequential or impact test, where it can be demonstrated that it does not undermine the viability of main town centres in Medway.

RTC20a Do you consider this is the appropriate approach to planning for Hempstead Valley shopping centre?

n/a

RTC20b Please explain why you consider / don't consider that this is an appropriate approach to planning for Hempstead Valley shopping centre

n/a

RTC21a Do you think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway?

n/a

RTC21b Please explain why you think / don't think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway

n/a

RTC22a Do you support a policy approach that seeks to achieve a balance of uses across all centres in Medway?

n/a

RTC22b Please explain why you support / don't support a policy approach that seeks to achieve a balance of uses across all centres in Medway

n/a

Dockside

RTC23a Do you support a policy approach that recognises the family leisure role of Dockside?

n/a

RTC23b Please explain why you support / don't support a policy approach that recognises the family leisure role of Dockside

n/a

RTC24 What do you think is the appropriate approach to further growth? Should policy only allow a small amount of new 'convenience' retail, or support a wider range of services and shops to develop its role as a local centre?

n/a

Medway Valley Leisure Park

Policy RTC9: Medway Valley Leisure Park

Medway Valley Leisure Park is a family leisure destination that attracts visitors and residents in the area.

The council's retail policy directs all leisure uses firstly to Medway's centres. Development proposals will be supported where enhancing current provision without requiring expansion beyond the designated boundary, subject to compliance with the council's retail policies:

- satisfying that no sequentially preferable sites were found;
- that the impact assessment has been satisfied where triggered

RTC25a Do you consider that this is an appropriate approach to planning for Medway Valley Leisure Park?

n/a

RTC25b Please explain why you consider / don't consider that this is an appropriate approach to planning for Medway Valley Leisure Park

n/a

RTC26a Do you think that there should be a specific policy to manage the development of Medway Valley Leisure Park, or if proposals should only be determined by use of wider retail policies?

There should be a specific policy – and consideration of a railway station should be reconsidered.

~~Proposals should be determined by use of wider retail policies~~

RTC26b Please explain your answer

The special nature of the area needs specific policies and any retail element would need to be resisted (unless a rail station alongside could be developed).

Healthy Sustainable Communities

Policy RTC10: Healthy sustainable communities

The council will support the provision of services and facilities, in accessible locations, to support the day-to-day activities of residents in a sustainable manner. Considerations of sustainability will include the offer (balance of retail, community uses and services), and accessibility - the mode of travel and distance.

The council recognises the importance of local services in villages as critical to sustainable rural communities.

RTC27a Do you agree with this proposed approach to sustainable communities?

n/a

RTC27b Please explain why you agree or disagree with this proposed approach to sustainable communities

Local facilities, provision for outreach services and multi-use locations should be supported and encouraged to provide for those less able to travel (cost/disability) and to reduce car traffic into district and town centres.

RTC27c What alternative approaches would you suggest?

n/a

Local Centres and Shopping Parades

RTC11: Local Centres and Shopping Parades

Uses within a defined local centre or smaller shopping parades must be appropriate to the scale, character and role of the centre or parade, be compliant with the council's retail policies and include the following uses to support the core function:

- Convenience retail offer to provide top up shopping
- Community uses (such as hall, library, notice board)
- Services (such as hairdressers, cash machines)
- provide convenience for local communities (allowing various activities to be undertaken)

Proposals resulting in the loss of the core uses listed above will be permitted in local centres and shopping parades where in compliance with the council's retail policies:

- it is demonstrated that the loss is mitigated by similar uses of community value in close proximity;
- it is demonstrated that the proposed use would make a positive contribution to the vitality and viability and balance of uses in the centre and is of appropriate scale and character;
- the unit has remained vacant for at least 6 months and can be demonstrated that reasonable attempts have been made, without success, to let or sell the premises for a shop or community use.

RTC28a Do you consider that this is the appropriate approach to planning for small retail areas?

n/a

RTC28b Please explain why you consider / don't consider that this is the appropriate approach to planning for small retail areas

n/a

RTC28c Do you think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis?

n/a

RTC28d Please explain why you think / don't think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis

n/a

Retail Parks

Policy RTC12: Retail Parks

Retail proposals will be permitted in defined retail parks (Strood Retail Park, Horsted Park, Gillingham Retail Park) appropriate to their character where the following criteria are satisfied:

- Provision of suitable access, parking or parking arrangements;
- It is demonstrated that no locations in-centres are available where uses are typical of and more appropriate for a town centre location;
- It is demonstrated satisfaction of an impact assessment that there will be no impact on centres, with particular attention to vitality, viability, vibrancy and sustainability of the existing centres and their vulnerabilities
- No significant impact on the transport network and parking in the surrounding area
- Good public realm and linkage to the neighbouring centre is provided assisting in linked trips and increasing dwell time in the neighbouring centre.

An impact and sequential assessment for non-minor retail (above 2,500sqm) will be required to take account of the cumulative impact of recent significant proposals.

Where appropriate the council will require:

- conditions or legal agreements will be required to manage impact on centres, including a condition on the type and range of goods.
- Public realm works to facilitate better linkage with the centre.

RTC29a Do you consider that this is an effective approach to planning for retail parks?

n/a

RTC29b Please explain why you consider / don't consider that this is a effective approach to planning for retail parks

n/a

RTC29c Would you suggest alternative policies for planning of development in retail parks?

n/a

Natural Environment and Green Belt

This section highlights the requirement to protect Medway's natural assets, including designated wildlife habitats, parks and other green spaces. It also considers how we can improve our resilience to climate change, including flooding, and improve levels of air quality.

Q11 Thinking about the natural environment and greenbelt section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support conservation and enhancement of the environment in Medway?

The amount and quality of the designates environment assets are worthy of protection, and enhancement and should be publicised. However the non-designated environment will also contribute to and complement this. Appropriate sites should be considered for designation and support from developers and the community.

There are technical questions asked about the following natural environment and green belt policy approaches:-

- Sites of international importance for nature conservation
- Conservation and Enhancement of the Natural Environment
- Kent Downs Area of Outstanding Natural Beauty
- Landscape
- Securing strong Green Infrastructure
- Green Belt
- Flood and Water Management
- Air Quality

Sites of international importance for nature conservation

Policy NE 1: Sites of international importance for nature conservation

The estuaries and marshes of the Thames, Medway and Swale are designated Special Protection Areas (SPAs) and Ramsar sites in recognition of their international importance as wetland habitats. There is a Special Area of Conservation in the North Downs woodland near north Halling. These sites require the highest level of protection from development that could damage the features of the designated areas. No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site, alone or in combination with other plans or projects, as it would not be in accordance with the Habitat Regulations 2010 (as amended) and the aims and objectives of this emerging Local Plan.

The council will work in collaboration with local planning authorities in north Kent to contribute to the delivery of a strategic access management and monitoring scheme to address potential damage from population increases on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

Development within 6km of these areas designated as the Special Protection Areas and Ramsar sites that has the potential to generate additional visits to these coastal areas will be required to make a defined tariff contribution to a strategic package of measures agreed by the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) Project Board.

The council will consider the potential for adverse impacts on the Special Areas of Conservation arising from development, either alone or in combination with other plans and projects. If the assessment shows that there is a potential for adverse impacts, steps will be taken to restrict or mitigate development

NE1a Do you consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats?

n/a

NE1b Please explain why you consider / don't consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats

n/a

NE1c What alternative approaches would you recommend to secure the favourable condition of these areas?

n/a

Conservation and Enhancement of the Natural Environment

Policy NE2: Conservation and Enhancement of the Natural Environment

The council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy NE1, Medway includes Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites and a Marine Conservation Zone.

The council will promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.

NE2a Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment?

n/a

NE2b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing Medway's natural environment

NE2c What alternative approaches would you recommend to secure the favourable condition of these areas?

n/a

Kent Downs Area of Outstanding Natural Beauty

Policy NE3: Kent Downs Area of Outstanding Natural Beauty

Development proposals in the Kent Downs AONB and in the setting of the downs will be required to contribute to the conservation and enhancement of the natural beauty of this designated landscape.

Development must demonstrate that it has have regard to the Kent Downs Management Plan and associated policy guidance.

NE3a Do you consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB?

n/a

NE3b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB

n/a

NE3c What alternative approaches would you recommend to secure the components of natural beauty?

n/a

Landscape

Policy NE4: Landscape

The council attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, containing urban sprawl and separation of settlements.

An updated Medway Landscape Character Assessment and Green Infrastructure Framework will provide a basis for determining the acceptability of development proposals and areas and features that need to be protected and enhanced.

Development proposals will be required to demonstrate that they protect, strengthen and connect features of local landscapes.

NE4a Do you consider that this is an effective approach to landscape policy in Medway?

n/a

NE4b Please explain why you consider / don't consider that this is an effective approach to landscape policy in Medway

n/a

NE4c What alternative approaches would you recommend?

n/a

Securing strong Green Infrastructure

Policy NE5: Securing strong Green Infrastructure

The council will protect the network of green infrastructure across rural and urban Medway. The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a Special Protection Area, Ramsar site and/or Special Area of Conservation. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland.

The council will consider the need to protect the special features of Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves

Wider components of the green infrastructure network will be protected in line with the analysis and strategy set out in the emerging Green Infrastructure Framework. This will include open space assets, landscape buffers and green infrastructure zones.

New development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.

The council will expect development proposals to demonstrate that they are designed to be resilient to, and can adapt to the future impacts of climate change, in strengthening ecological networks.

The council will promote the extension of the green infrastructure network through setting criteria for the establishment and maintenance of Local Green Spaces.

Opportunities will be sought to promote and enhance the public rights of way network, including footpaths, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside.

NE5a Do you consider that this is an effective approach to securing effective and healthy green infrastructure in Medway?

n/a

NE5b Please explain why you consider / don't consider that this is an effective approach to securing effective and healthy green infrastructure in Medway

n/a

NE5c What alternative approaches would you recommend to secure effective and healthy green infrastructure in Medway?

n/a

Green Belt

Policy NE6: Green Belt

The council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.

The council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

NE6a Do you agree with the proposed policy for Green Belt?

n/a

NE6b Please explain why you agree or disagree with the proposed policy for Green Belt

Supported, although there should be a review of the green belt boundary to the west of Medway, rather than the existing boundary that, mainly, follows the KCC/Gravesham/Medway boundary.

NE6c Do you consider that the exceptional circumstances exist to justify the review of the Green Belt boundary?

n/a

NE6d Please explain why you consider / don't consider that the exceptional circumstances exist to justify the review of the Green Belt boundary

n/a

NE6e Do you have suggestions for alternative approaches to Green Belt policy?

n/a

Flood and Water Management

Policy NE7: Flood and Water Management

The Local Plan will seek to reduce flood risk, promote water efficiency measures, and protect and enhance water quality through the following mechanisms:

Flood Risk Management

- Ensuring that development has a positive or nil impact on flood risk management interests
- Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.
- Where development benefits from an existing or proposed flood infrastructure, the development should contribute towards the capital costs and/or maintenance of these defences over the lifetime of the development.

Sustainable Urban Drainage

Development should enable or replicate natural ground and surface water flows and decreased surface water runoff, via the use of Sustainable urban Drainage systems (SUDS), utilising green infrastructure where possible and as guided by relevant national (and/or local standards) and guidance.

Where SuDs are provided, arrangements must be put in place for their management and maintenance over their full lifetime.

Water Supply

Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and it does not put at risk the ability to maintain a public water supply.

Water Quality

All new development should have regard to the actions and objectives of appropriate River Basin Management Plans (in Medway, this is the Thames River Basin District) in striving to protect and improve the quality of water bodies in and adjacent to the district, as well as ecology, geomorphology, and water quantity. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary.

Adaptation to Climate Change

Development will be required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures. These include:

- Incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment.
- Minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDs in accordance with (SuDs policy above).
- Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading.

- Seeking opportunities to make space for water and develop new blue infrastructure to accommodate climate change.
- Where possible watercourses and wetland features will be adequately buffered from development commensurate with the designation and/or ecological value of those features so that they can be safeguarded and managed sustainably in perpetuity.
- Provision for buffering, mitigating and extending habitats and green corridors to ensure that wildlife populations are more resilient for a changing climate.

NE7a Do you agree with the proposed policy for flood and water management?

n/a

NE7b Please explain why you agree or disagree with the proposed policy for flood and water management?

n/a

NE7c Do you have suggestions for alternative approaches for this policy area?

n/a

Air Quality

Policy NE 8: Air Quality

The council seeks to reduce exposure to areas of poor air quality, maintain areas of good air quality, and where possible improve air quality through restricting development or requiring acceptable and effective mitigation measures.

Proposed developments which have the potential to impact on air quality will be expected to be accompanied by air pollution impact assessments and mitigation measures, in accordance with local air quality guidance.

All proposals should take account of the Medway Council Air Quality Planning Guidance that sets out a screening checklist for major size development and proposed development within, or close to an AQMA. Depending on the scale of development, the council may require the submission of an Air Quality Assessment and/or an Emissions Mitigation Assessment.

The guidance also advocates mitigation measures for all development. Where mitigation is not integrated into a scheme, the council will require this through a planning condition(s). If on site mitigation is not possible, then the council may seek contribution to wider air quality mitigation measures through a planning obligation.

NE8a Do you agree with the proposed policy for air quality?

Agree

~~Disagree~~

NE8b Please explain why you agree or disagree with the proposed policy for air quality?

n/a

NE8c Do you have suggestions for alternative approaches for this policy area?

n/a

Built Environment

This section is concerned with the impact development has on its surroundings, especially in terms of historic character and appearance of areas. Buildings must be designed and delivered in a sustainable way; residential accommodation needs to be delivered to an appropriate density and to provide the space people need to live.

Q14 Thinking about the built environment section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support sustainable development and high quality design in Medway?

n/a

There are technical questions asked about the following built environment policy approaches:-

- Promoting High Quality Design
- Sustainable Design
- Housing Design
- Housing Density Approach
- Historic Environment and Managing development in the historic environment

Promoting High Quality Design

Policy BE1: Promoting High Quality Design

Development in Medway will be expected to be of high quality design that makes a positive contribution and respond appropriately to the character and appearance of its surroundings.

Proposals that incorporate high quality design and sustainability which demonstrably consider the following criteria will be permitted:

- The scale and form of development is appropriate to its surrounding context and is characteristic of Medway, or where appropriate new high quality character;
- The protection and possible enhancement of the historic environment and heritage assets;
- How the proposal relates to and/or reinforces the local distinctiveness and character through the use of high quality materials and local vernacular materials where appropriate; landscaping and building detailing;
- Working with the topography of the site and the incorporation of existing natural features;
- Responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site;
- Makes efficient use of land and ensures appropriate streetscapes;
- Good connectivity permeability that provides a clear user hierarchy for pedestrians, cycles, public transport and cars and that streets and spaces within new residential developments are not overly car dominated;
- Demonstration of provision and/or access to essential services and facilities;
- Respects the amenity of neighbouring uses through consideration of light levels, overshadowing, overlooking, loss of privacy, visual intrusion, appropriately designed car parking and ensuring minimal impact through noise, vibration, fumes or light pollution, and other relevant considerations;
- Creates a safe environment;
- Buildings that are appropriately flexible/adaptable and in appropriate circumstances transformable in the interests of sustainable life-long places;
- Provides for discreet waste and recycling bin storage and collection in accordance with the 'Medway Waste Management Requirements for New Developments' or other superseding guidance;
- High quality landscaping and areas of public realm that make use of or retaining features considered relevant/important by the Council and demonstrating linkages/contribution toward green infrastructure assets and networks;
- Achieves a transition from urban to rural where appropriate;
- Includes measures to mitigate and adapt to climate change.
- For development to demonstrate sustainability criteria, such as at least meeting a BREEAM standard of 'Very Good' for both energy efficiency and water efficiency.

The Council would expect compliance with the principles of nationally recognised standards, such as the Lifetime Homes and Building for Life (BfL12) Standards, so far as practicable, across all proposed new housing.

Proposals that fail to take the opportunity to incorporate high quality design will be resisted.

BE1a Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?

n/a

BE1b Please explain why you think that the proposed policy for high quality design do / don't represent the most appropriate approach for the Medway Local Plan

Essential policy (and protections need to be built into developments to lock these in)

BE1c What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

n/a

Sustainable Design

Policy BE2: Sustainable Design

All new development should aim for high standards of sustainable design and construction where feasible.

For residential development this will include meeting the higher national water efficiency standard of 110 litres/person/day. Where possible on large developments, a water efficiency standard of 90 litres/person/day will be sought.

BE2a Does the proposed policy for sustainable design represent the most appropriate approach for the Medway Local Plan?

n/a

BE2b Please explain why you think the proposed policy for sustainable design does / doesn't represent the most appropriate approach for the Medway Local Plan

n/a

BE2c What do you consider would represent a sound alternative approach towards sustainable design in the Medway Local Plan?

n/a

Housing Design

Policy BE3: Housing Design

New housing developments should provide good living conditions for future occupants with high quality, robust, adaptable housing and functional spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities. All new accommodation must, in addition to the general design policy above:

- As a minimum meet the relevant nationally described internal space standard for each individual unit;
- As a minimum meet the Medway Housing Design Standard (MHDS) for external spaces including shared outdoor amenity space, shared access and circulation, cycle storage, refuse and recycling, management, visual privacy and private outdoor space, environmental comfort;
- Be arranged to ensure primary habitable rooms have an acceptable outlook and where possible receive direct sunlight;
- Be designed to minimise the disturbance to occupants from other land uses nearby and/or other sources of noise, vibration and pollution;
- Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms, unless there is justification for doing so on the basis of a significant design quality gain;
- Incorporate sufficient space for storage and clothes drying;
- Encourage the extensive use of trees as a positive contribution to air/environmental quality within housing developments;
- Be designed with a clear and particular attitude to place-making and distinctiveness within their context.

BE3a Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan?

n/a

BE3b Please explain why you think the proposed policy for housing design does / doesn't represent the most appropriate approach for the Medway Local Plan Provision for waste management and recycling needs to be added to the policy.

n/a

BE3c What do you consider would represent a sound alternative approach for housing design in the Medway Local Plan?

n/a

Housing Density Approach

Policy BE4: Housing Density Approach

The council will seek the efficient use of land and secure positive contributions to place-making through supporting developments at higher densities in appropriate locations, where it can be demonstrated that it does not create an unacceptable impact on the surrounding amenity and environment, and has the potential to boost the vibrancy and vitality of town centres.

Density should be reflective of the particularity in its surroundings and make the most effective and efficient use of land.

The council will consider varying attitudes to density on a case by case basis in developing masterplans and development briefs for regeneration sites.

Densities surrounding transport interchanges (railway stations and bus stations) will be expected to be higher to reflect the nature of these areas as transport hubs providing sustainable travel choices.

A range of house types should be considered regarding housing mix.

BE4a Does the proposed policy for housing density represent the most appropriate approach for the Medway Local Plan?

n/a

BE4b Please explain why you think the proposed policy for housing density does / doesn't represent the most appropriate approach for the Medway Local Plan

In general supported, although higher densities surrounding transport interchanges (railway station and bus stations) may be appropriate in the urban areas but will not to be practical in rural locations that do not have a wider range of retail and community facilities (noted that this idea was suggested by the Government)

BE4c Is there an alternative way to express optimum net residential density, e.g. habitable rooms per hectare?

n/a

BE4d What do you consider would represent a sound alternative approach for housing density in the Medway Local Plan?

n/a

Historic Environment and Managing development in the historic environment

Policy BE5: Historic Environment

To ensure the continued contribution that the historic environment has on Medway, the council will support the conservation and, where possible, the enhancement of the historic environment; including the heritage assets and their distinctiveness and characteristics. This will be achieved through:

- Restricting development that could have an unacceptable impact on a designated heritage asset and its setting;
- Ensuring that all new development contributes to local distinctiveness and character;
- Encouraging development that makes sensitive use of historic assets, particularly where they are under-used or redundant;
- Promoting the preservation of historic buildings considered to be 'at risk';
- Resisting demolition or destruction of heritage assets without substantial justification that clearly demonstrates that public benefit outweighs the harm or loss resulting from the demolition or destruction;
- Working with stakeholders on heritage initiatives, including bids for funding.

Policy BE6: Managing development in the historic environment

Development that impacts a heritage asset, or its setting, should achieve a high quality of design which will preserve or enhance the asset's historic or architectural character, appearance and setting.

Where a development impacts upon a heritage asset, or its setting, a proportionate heritage assessment must be submitted that assesses the level of impact.

The demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that all possible methods of preserving the asset have been investigated. In the circumstances where the loss of a heritage asset can be fully and robustly justified, the developer must make information about the heritage asset and its significance available to the council, along with making it possible for any materials and features to be salvaged.

Where a development involves, or has the potential to involve heritage assets with archaeological interest, applicants must submit a desk-based assessment, or where appropriate, a field evaluation.

BE5a Do the proposed policies for the historic environment represent the most appropriate approach for the Medway Local Plan?

n/a

BE5b Please explain why you think the proposed policies for the historic environment do / don't represent the most appropriate approach for the Medway Local Plan

n/a

BE5c What do you consider would represent a sound alternative approach towards planning for the historic environment in the Medway Local Plan?

n/a

Health and Communities

This section identifies the opportunities to enhance health and well-being as Medway grows. It focusses on healthcare facilities, supporting healthy lifestyles, and community facilities that support good quality of life.

Q17 Thinking about health and communities section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to help improve the quality of life for Medway's residents?

n/a

Promoting Health and Wellbeing

Policy HC1: Promoting Health and Wellbeing

The council is committed to reducing health inequalities, increasing life expectancy and improving quality of life. It will support work to improve economic and social opportunities to tackle disadvantage across Medway by:

- Seeking opportunities to improve access to healthcare facilities and activities that promote physical and mental health and wellbeing.
- Requiring planning applications for major new residential developments where Environmental Impact Assessments are required, or developments identified by the council with the potential for negative health impacts, to be accompanied by a health impact assessment in line with the HUDU Rapid Health Impact Assessment Tool. The results of this assessment will be a material consideration in determining applications.
- Helping to tackle obesity, encourage physical activity and support mental wellbeing, through the provision of greenspaces, public realm and sports facilities accessible to all, creating and enhancing environments conducive to walking and cycling.
- Ensuring new development is sustainably located with access to local health facilities, and contributes to increasing capacity in line with the scale of proposed growth, and the council's policy for infrastructure contributions from developers.
- Increasing access to healthy food choices through extending opportunities for growing food such as allotments & community gardens; securing a range of local services; and a reduction in the proliferation of uses promoting unhealthy food options, including controls on A5 uses, in line with the council's Hot Food Takeaway Guidance Note.
- Promoting health and wellbeing through the design and layout of development in order to mitigate health conditions, such as dementia, and improve the accessibility of public places.
- Working alongside healthcare commissioners to plan for the future of acute care the council will seek to investigate the redevelopment of the present Medway Maritime Hospital site and if deemed necessary the relocation, or partial relocation of some services, to a new site within Medway.

HC1a Does the proposed policy for Health and Wellbeing represent the most appropriate approach to planning for health improvements in Medway?

n/a

HC1b Please explain why you think the proposed policy for Health and Wellbeing does / doesn't represent the most appropriate approach to planning for health improvements in Medway

n/a

HC2a Do you agree with the proposed threshold for HIAs?

n/a

HC2b Please explain why you agree or disagree with the proposed threshold for HIAs

n/a

HC3a Do you agree with the council's proposed approach to managing Hot Food Takeaways?

n/a

HC3b Please explain why you agree or disagree with the council's proposed approach to managing Hot Food Takeaways

n/a

HC4 What do you consider would represent a sound alternative approach towards planning for health in the Medway Local Plan?

n/a

Community Facilities

Policy HC2: Community Facilities

The council recognises the importance of community facilities and the need for an appropriate range of facilities as a key component of sustainable development. The council will seek to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors.

The council will support appropriate development that seeks to enhance community facilities, that does not have a negative impact on the surrounding amenity, historic and natural environment and transport networks.

The council will require provision to be made for community facilities in planning for new development. Large scale residential developments will be required to provide community facilities to meet the needs of new residents and seek opportunities to support integration with existing communities.

New community facilities should be located within or near the community they are intended to serve and should be appropriately located to limit the need to travel, being accessible to users by walking, cycling and public transport.

If the development is smaller scale and community facilities cannot be accommodated on site, a contribution will be sought to upgrade appropriate facilities off site, where it can be demonstrated that they are accessible to residents of the new development and that there is capacity for the increased population. All developments for over 10 homes will be required to contribute to upgrading community facilities in line with the council's policy on infrastructure contributions from developers.

There is a presumption against the loss of community facilities in rural and urban areas. Any proposal which would result in the loss of a community facility will not be permitted unless:

- an alternative community facility which meets similar local needs to at least the same extent is already available; and
- it can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character and vitality of the area; and
- in the case of commercial community facilities, it has been demonstrated that it is no longer economically viable and cannot be made so.

HC5a Does the proposed policy for Community Facilities represent the most appropriate approach to planning for this aspect of social needs in Medway?

n/a

HC5b Please explain why you think the proposed policy for Community Facilities does / doesn't represent the most appropriate approach to planning for this aspect of social needs in Medway

n/a

HC5c Do you agree with the proposed approach to addressing the presumption against loss of community facilities?

n/a

Disagree

HC5d Please explain why you agree or disagree with the proposed approach to addressing the presumption against loss of community facilities

n/a

HC5e What do you consider would represent a sound alternative approach towards planning for community facilities in the Medway Local Plan?

n/a

Infrastructure

Sufficient supporting infrastructure is vital for delivery of growth in Medway. This section focuses on means of securing funding for services and infrastructure from development and planning for education, communications technology, utilities and open space and sports facilities.

Q20

Thinking about the infrastructure section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to help improve Medway's infrastructure?

There appears to be a lack of a comprehensive list of infrastructure requirements or how they would be delivered. A sequential approach to delivering them before or early in the development process does need to be established. There also needs to be an identification of what cannot be delivered without a firm commitment of contingent infrastructure.

Infrastructure Planning and Delivery

Policy I1: Infrastructure Planning and Delivery

The council will seek the timely and effective delivery of infrastructure to support the local economy and meet the needs of Medway's communities. It will seek opportunities through working with government agencies, infrastructure bodies, developers and partner organisations to secure improvements to infrastructure in Medway.

It will produce and regularly review an Infrastructure Delivery Plan, identifying the range, cost and scope of infrastructure improvements required in Medway.

Development coming forward in Medway will be expected to contribute to the delivery of new and improved infrastructure, in line with the council's evidence base and policy for infrastructure contributions from developers.

Appropriate conditions will be attached planning permissions in order to make development acceptable and to support the provision of infrastructure.

The council will identify land for safeguarding for the provision of future infrastructure where required to meet specific development needs.

The council will engage with appropriate bodies on strategic infrastructure planning matters, meeting the Duty to Cooperate and where appropriate, and through Statements of Common Ground supporting plan making.

I1a Does the proposed policy for Infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway?

n/a

I1b Please explain why you think the proposed policy for Infrastructure planning and delivery does / doesn't represent the most appropriate approach to planning for infrastructure improvements in Medway

The Infrastructure Delivery Plan needs to be established BEFORE the level of development in the local plan can be assessed as Sustainable.

I1c What do you consider would represent a sound alternative approach towards planning for infrastructure in the Medway Local Plan?

n/a

Developer Contributions

Policy I2: Developer Contributions

To make development acceptable and enable the granting of planning permission, deficiencies in infrastructure arising from proposed development will be mitigated through developer contributions and conditions.

Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to provide or contribute towards the additional requirement to an agreed delivery programme. Where demonstrated to be necessary, the council will require that infrastructure is delivered ahead of the development being occupied.

Where developers consider that providing or contributing towards the infrastructure requirement would have serious implications for the viability of a development, the council will require an "open book" approach and, where necessary, will operate the policy flexibly.

I2a Does the proposed policy for developer contributions represent the most appropriate approach?

Yes

~~No~~

I2b Please explain why you think the proposed policy for developer contributions does / doesn't represent the most appropriate approach

Early delivery of infrastructure will be needed – before or early in the development.

I2c What do you consider would represent a sound alternative approach for developer contributions in the Medway Local Plan?

n/a

Education

Policy I3: Education

Early Years & School Provision

As Medway's population grows additional school places will be needed. New residential developments of significant scale will be expected to provide education facilities within their development in order to create sustainable communities. The requirements will be informed by the council's School Organisation Plan and Education Planning Team providing an assessment of the capacity and suitability of existing local schools to expand existing school provision.

All proposals for residential developments over 10 homes will be required to contribute to the funding of education services in accordance with the council's policy for infrastructure contributions from developers.

Proposals for the upgrading and expansion of existing schools and development of new schools in locations where additional provision is required will be supported subject to the criteria below. The council may use its Compulsory Purchase powers to facilitate the development of new schools where necessary.

Proposals for new education facilities should:

- have safe access by cycle and walking, public transport and car and incorporate a school travel plan;
- have safe drop-off and pick-up provision;
- provide outdoor facilities for sport and recreation; and
- avoid conflict with adjoining uses.

The Council supports consideration of opportunities for co-location of community services and shared use facilities on school sites. Educational facilities shall be encouraged to diversify to provide a wider range of services to benefit the whole community, such as sports facilities or community centres open to the public.

Further & Higher Education

The development and expansion of the Universities at Medway and Higher and Further Education Colleges will be supported within the 'learning quarter' at Chatham Maritime. Development of supporting uses where there is an identified link to the Universities and other research and development establishments will be supported where appropriate, and does not conflict with other policies in the plan.

I3a Does the proposed policy for Education represent the most appropriate approach for planning for education facilities?

n/a

I3b Please explain why you think the proposed policy for Education does / doesn't represent the most appropriate approach for planning for education facilities

n/a

I3c What do you consider would represent a sound alternative approach for planning for education facilities in the Medway Local Plan?

n/a

Communications Technology

Policy I4: Communications Technology

In order for Medway to achieve its economic and social potential and maintain its status as a well-connected place to live and work, the Council will seek to develop and enhance the provision of broadband and telecommunications infrastructure coverage across Medway.

When considering proposals for the development of communications installations, regard will be given to:

- operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications apparatus;
- the potential for sharing existing masts, buildings and other structures; and
- the impact of the development on its surroundings with particular regard to the visual amenity, character or appearance of the surrounding area, and the proposed provision of landscaping.

Apparatus and associated structures sited on a building should be sited and designed in order to seek to minimise impact to the external appearance of the host building.

Development should not have an unacceptable effect on conservation areas or buildings of architectural or historic interest or areas of ecological interest or areas of landscape value or sites of archaeological importance.

Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.

Broadband

Proposals for new major employment and residential developments should include appropriate infrastructure, wired and wireless, to provide high speed internet access as part of the development.

I4a Does the proposed policy for Communications represent the most appropriate approach for the Local Plan?

n/a

I4b Please explain why you think that the proposed policy for Communications does / doesn't represent the most appropriate approach for the Local Plan

n/a

14c What do you consider would represent a sound alternative approach for planning for communications infrastructure in the Medway Local Plan?

n/a

Utilities

Policy I5: Utilities

Any new development will be supported by the requisite utilities infrastructure.

The council seeks early engagement with utilities providers in planning to meet the strategic growth needs of Medway as set out in the Local Plan, and which supports the timely and sustainable delivery of development.

Significant new development proposals will be assessed to determine the impact on the existing network (water, electricity and gas).

I5a Does the proposed policy for Utilities represent the most appropriate approach for the Local Plan?

n/a

I5b Please explain why you think that the proposed policy for Utilities does / doesn't represent the most appropriate approach for the Local Plan

n/a

I5c What do you consider would represent a sound alternative approach for planning for utilities infrastructure in the Medway Local Plan?

n/a

Open Space and Sports Facilities

Policy I6: Open Space and Sports Facilities

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Policy I7: New Open Space Provision

Provision for new open space will be in line with specifically identified needs, informed by a robust assessment. Strategic scale development will be required to provide new greenspaces to meet community needs, and contribute to the quality of placemaking

Policy I8: New Playing Pitches

New pitches will be provided in line with specifically identified needs, informed by a robust assessment.

Any new playing pitches should be constructed in line with Sport England guidance.

I6a Do the proposed policies for open spaces, sports facilities and playing pitches represent the most appropriate approach for the Local Plan?

n/a

I6b Please explain why you think that the proposed policies for open spaces, sports facilities and playing pitches do / don't represent the most appropriate approach for the Local Plan

n/a

I6c What do you consider would represent a sound alternative approach for planning for open spaces, sports facilities and playing pitches in the Medway Local Plan?

n/a

Gillingham Football Club

Policy I9: Gillingham Football Club

The Council recognises the positive benefits of a successful football club to the Medway community and economy and will work positively with the club to find an appropriate site for the development of a new stadium with associated facilities that should include education, employment, sports and leisure, community use and hotel and conference facilities. Any proposals must demonstrate the sustainability of the site, include an Environmental Impact Assessment and demonstrate the benefit to Medway as a place to live, work, learn and visit.

I7a Do you agree with the proposed policy for Gillingham Football Club?

n/a

I7b Please explain why you agree or disagree with the proposed policy for Gillingham Football Club

n/a

I7c Do you support the relocation of Gillingham Football Club to a new stadium in Medway?

Yes (where policy stated can be met). It should be close to rail with a new station if necessary.

~~No~~

I7d Please explain why you do / don't support the relocation of Gillingham Football Club to a new stadium in Medway

n/a

I7e Where do you consider would be a suitable location for a relocated stadium?

n/a

I8 What uses would you expect to see come forward as part of any new stadium proposals?

Community facilities

Transport

This section looks at planning for transport networks and facilities to ensure our transport systems are fit for the future; making links to development, supporting businesses and leisure activities.

Q23

Thinking about the transport section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support a sustainable and effective transport network in Medway?

Road congestion is already high in many locations and movement round the Medway Towns compromised (and even more so when there is disruption on major roads). Use of public transport (including rail) across the towns should be encouraged. New developments will need to provide support for residents to plan their options and support alternatives to car use (where practical).

Promoting sustainable transport

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

T1a Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?

Agree Importance of air quality, noise and traffic congestion are major requirements. Use of the railway within the Medway Towns (East/West and North/South) needs further publicity and encouragement)

~~Not Agreed~~

T1b Please explain why you agree or disagree that this approach offers an appropriate strategic approach to transport planning in Medway

n/a

T1c What do you consider would represent a sound alternative approach towards sustainable transport in the Medway Local Plan?

n/a

Integrating Land Use and Transport Planning

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 (replicated below for ease of reference).

Proposals which compromise this policy will be resisted.

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

The approach is based on four walking zones centred on rail stations:

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

* Indicative for Development Strategy Scenarios 2 and 3 only

	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

T2a Do you agree/disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway?

Agree

~~Disagree~~

T2b Please explain why you agree or disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway

T3a 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?

Agree (as long as a rural densification is developed alongside an urban area)

~~Disagree~~

T3b Please explain why you agree or disagree that densification is more likely to increase the viability of additional and/or improved public transport services

n/a

T4a 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?

Yes

No

T4b Please explain why you think it is appropriate / inappropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs

Practical benefits outside major cities does not appear to be proven.

T4c Continuing to think about the optimum densities set out in Table 11.1. For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare?

Yes

No

T4d Please explain why, for peripheral areas, you think it is appropriate / inappropriate to require a minimum of 35 dwellings per hectare?

Case by case required.

T4e Would it be appropriate to include Cuxton and Halling stations in Table 11.1?

Yes

No

T4f Please explain why you think it would be appropriate / inappropriate to include Cuxton and Halling stations in Table 11.1

Rural stations do not have the range of services and facilities that support an increased density.

T5 What do you consider would represent a sound alternative approach towards the integration of land use and transport planning in Medway?

n/a

Hoo Peninsula rail connection

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.

T6a Do you support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight?

Yes (Strongly supported)

~~No~~

T6b Please explain why you support / do not support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight

Road access into town and to the major road network is already congested, without future developments. Vehicles need to be taken off the road where practical.

T6c The council welcomes responses indicating areas of land to be safeguarded. This information could be considered in a business case, subject to funding. Do you have any areas you would like to suggest:-

B2000 between Cliffe and Cliffe Woods for a future halt/station.

Land around Kingsnorth for a passenger terminal station and transport interchange for the Hoo Peninsula.

T6d What alternative approaches would you suggest?

The work with Network Rail has opened up some options for development of rail service (Kent Route Study) and highlights the challenge of electrifying the line and supporting 12 coach trains (for connection to London) – however this is far too expensive and is unlikely to be deliverable in the lifetime of the Local Plan. Start with basic service (2/3 coach battery/hybrid to Medway Towns (Strood Platform 3)) and then grow with services towards London as demand grows (when/if Crossrail comes to Gravesend and other Gravesend services can be extended). Initial costs will have to be met, in the main, by developer contributions so a relatively low cost solution should be implemented as quickly as possible).

Rochester Airport

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.

T7a Do you agree with the proposed policy for aviation in Medway?

n/a

T7b Please explain why you agree or disagree with the proposed policy for aviation in Medway

n/a

T7c What alternative approach would you propose for planning policy for aviation in Medway?

n/a

Riverside Infrastructure

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.

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.

T8a Do you agree with the proposed policy for riverside infrastructure in Medway?

n/a

T8b Please explain why you agree or disagree with the proposed policy for riverside infrastructure in Medway

n/a

T9a Do you consider the flexible approach to Chatham Docks to be appropriate?

n/a

T9b Please explain why you consider / don't consider the flexible approach to Chatham Docks to be appropriate

n/a

T10 What alternative approach would you propose for planning policy for riverside infrastructure in Medway?

n/a

Medway Riverside Path

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.

T11a Do you agree with the proposed policy for a riverside path in Medway?

n/a

T11b Please explain why you agree or disagree with the proposed policy for a riverside path in Medway

n/a

T11c What alternative approach would you propose for planning policy in Medway?

n/a

Marinas and moorings

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.

T12a Do you agree with the proposed policy for marinas and moorings in Medway?

n/a

T12b Please explain why you agree or disagree with the proposed policy for marinas and moorings in Medway

n/a

T12c What alternative approach would you propose?

n/a

Urban Logistics

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.

T13a Do you agree with the proposed policy for planning for logistics in Medway?

Agree

Disagree

T13b Please explain why you agree or disagree with the proposed policy for planning for logistics in Medway

It is not clear how the local road infrastructure would support this level of activity. Use of the railway, for inward and major outward delivery should be encouraged/enforced.

T13c 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. Please make any suggestions below:-

See above

T13d What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?

n/a

Connectivity and Permeability

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.

T14a Do you agree with the proposed policy for planning for connectivity in Medway?

n/a

T14b Please explain why you agree or disagree with the proposed policy for planning for connectivity in Medway

n/a

T14c What alternative approach would you propose?

n/a

Vehicle Parking, Cycle parking and storage and Managing the transport impact of development

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

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.

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.

T15a Do you agree with the proposed policy approaches for managing the transport impacts of development and provision for parking?

Agree

Disagree

T15b Please explain why you agree or disagree with the proposed policy approaches for managing the transport impacts of development and provision for parking

Support for Cycle Parking and Storage

Support policy for transport plans – but to include references to the Kent Community Rail Partnership for developments alongside the Medway Valley Line or any Hoo Peninsula Passenger Rail.

There should also be a body established by developers, the council or a private/public sector body to establish and run a local exchange for building materials (plant, equipment, materials and soils etc.) so that these items can be shared/re-allocated/re-used rather than sent to land fill or transported in and out of the area unnecessarily when needed locally – ultimate disposal if not used would remain with the generator of the material/item.

T15c 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?

Yes

~~No~~

T15d Please explain why you think it would / wouldn't be prudent to seek to manage this through planning policy

Implications and support for this may be identified early in any new development.

T15e What alternative approaches would you propose for policy in the new Medway Local Plan

n/a

Minerals, Waste and Energy

This section looks at how we need to plan for the sustainable supply of minerals, including wharves for importation of materials, how we plan for the management of waste and it also looks at planning for energy, renewables and supporting low carbon development.

Thinking about the minerals, waste and energy section of the Development Strategy, please answer the following question.

Q26 When developing the Local Plan what things do you think the council should consider to manage minerals, waste and energy within Medway whilst supporting regional and national demand?

n/a

There are technical questions asked about the following infrastructure policy approaches:-

- Minerals Supply, Land-won extraction of sands and gravels, Land-won minerals: chalk and clay, Minerals wharves and railheads and Minerals infrastructure
- Waste Management, New Waste Management Facilities, Existing Waste Management Facilities, Waste disposal to land and Waste Water Treatment Works
- Energy and Renewables and Low Carbon Development

Minerals

Policy MWE1: Minerals Supply

The council will plan for a steady and adequate supply of minerals by:

- Maintaining a 7-year landbank of permitted sand and gravel reserves;
- Supporting regional consideration and planning of minerals through its membership of the South East England Aggregates Working Party.

Policy MWE2: Land-won extraction of sands and gravels

Proposals for the extraction of sand and gravel will be permitted within the identified areas of search when:

- There is a proven need for the minerals to be extracted at that time in order for the council to maintain a 7-year landbank;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
 - o Exceptions will be considered when there are demonstrable overriding benefits that justify the development.

Policy MWE3: Land-won minerals: chalk and clay

Proposals for the extraction of land-won minerals will be permitted outside of the identified areas of search when:

- There is no adverse impact on sites designated for environmental or heritage significance;
- There is a proven need for the minerals to be extracted at that time;
- The site is not allocated for another use in the Local Plan;
- The site is located in an area that can accommodate the proposed development;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
- Exceptions will be considered when there are demonstrable overriding benefits that justify the development.

Policy MWE4: Minerals wharves and railheads

The identified minerals importation and distribution facilities that currently benefit from permanent planning permission will be safeguarded from development that would prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;

- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the importation or distribution facility can be made elsewhere in Medway.

Policy MWE5: Minerals infrastructure

Facilities for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material in Medway will be safeguarded from development that will prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;
- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the facility can be made elsewhere in Medway.

MWE1a Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway?

n/a

MWE1b Please explain why you think that the proposed policies MWE1-MWE5 do / don't represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway

n/a

MWE1c What do you consider would represent a sound alternative strategy for minerals planning in the Medway Local Plan?

n/a

Waste

Policy MWE6: Waste Management

All development should seek to minimise the generation of waste, having regard to the Waste Hierarchy.

The council will promote sustainable waste management within all new developments, ensuring that there is an appropriate provision for the separation, storage and collection of waste.

In order to help reduce waste through the development process, planning applications for major or strategic development¹⁹⁴ or those where significant levels of waste will be generated must include a waste management audit. The audit will be expected to show how waste is to be managed both through the construction period, including demolition and remediation, if appropriate; and that effective means of managing waste arising from the development are provided.

The council will continue to actively support regional consideration and the planning of waste management through its membership of the South East Waste Planning Advisory Group (SEWPAG), and with neighbouring Waste Planning Authorities on cross-border waste management issues and opportunities.

Policy MWE7: New Waste Management Facilities

The council will strive to maintain net self-sufficiency across each of the waste streams through permitting facilities for the reuse, recycling, treatment and transfer of waste materials, subject to their being of an appropriate environmental standard. Medway City Estate and Kingsnorth and, at a lesser scale, the existing established industrial estates are the preferred locations for such activities. The development of waste facilities outside of identified industrial areas will only be permitted where:

- There is no adverse impact on sites designated for environmental or heritage significance;
- The site is not allocated for other uses in the Local Plan;
- The site is located in an area that can accommodate the proposed development and does not have an unacceptable impact on amenity, the local environment and transport networks; and
- The site comprises brownfield land;
 - o Proposals on green field land will only be permitted where no alternative suitable brownfield sites can be identified.

Special consideration will be given to the development of waste management within existing established industrial estates that utilise existing rail facilities or the river Medway as a means of transportation.

Policy MWE8: Existing Waste Management Facilities

Existing waste management facilities that currently benefit from permanent planning permission will be safeguarded from development for non-waste management uses, unless;

- The proposed site is allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;

- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the waste management facility can be made elsewhere in Medway.

Policy MWE9: Waste disposal to land

Proposals for the creation of void space or land-raising to facilitate a disposal facility for non-inert or hazardous waste located within the areas referred to as the Disposal to Land Resource Areas on the Hoo Peninsula and Isle of Grain will be assessed against the following criteria:

- Impact of development on rural landscape character and local distinctiveness;
- Other local impacts, including on residential amenity, being acceptable;
- The site being well related to the primary road network and with suitable site access and egress arrangements, and that impacts on the transport network are acceptable. Opportunities for transport by rail and water are encouraged;
- It being clearly demonstrated that the material to be deposited cannot be reasonably disposed of in any other way (that is that they are irreducible residues);
- That the facility will handle a high proportion of such waste arising within Medway and the immediately surrounding area to ensure a sustainable pattern of disposal;
- Unless a specific needs case can be demonstrated, that wastes to be deposited do not involve a road haulage distance of more than 50 miles;
- That all the reasonable requirements of the Environment Agency can be satisfied; and
- There being a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site.

Policy MWE10: Waste Water Treatment Works

Proposals for the development of new, or the extension to existing waste water treatment works, sewage treatment and disposal facilities will be permitted in sustainable locations where there is a proven need for the proposed facility, and development does not conflict with the need to safeguard the environment and does not create unacceptable impacts on amenity.

MWE2a Do the proposed policies MWE6-MWE10 represent the most sustainable approach to managing Medway's waste?

n/a

MWE2b Please explain why you think that proposed policies MWE6-MWE10 do / don't represent the most sustainable approach to managing Medway's waste

n/a

MWE2c What do you consider would represent a sound alternative strategy for waste management in the Medway Local Plan?

n/a

Energy

Policy MWE11: Energy and Renewables

Proposals for energy developments, including any ancillary building or infrastructure, will be supported unless:

- the impact would compromise statutory designations where national planning policy restricts development;
- their scale, form, design, material and cumulative impacts is unacceptable to the local landscape or built environment, or loss of the best and most versatile agricultural land;
- any adverse impacts on the local community, economy, biodiversity or historic interests cannot be mitigated;

The council will consider the designation of defined areas for renewable energy technologies through a Local Landscape Character Assessment.

The council will actively promote the development of local supply chains and other associated employment opportunities.

The council will explore opportunities for Combined Heat and Power Systems connected to district heating networks.

Policy MWE12: Low Carbon Development

This policy seeks to implement an energy hierarchy by achieving energy efficiency first, before requiring the implementation of other forms of renewable energy generation on a larger scale.

Developers are required to follow the hierarchical approach set out below in achieving the energy and carbon dioxide emission requirements of the Building Regulations for all new residential development. New non-residential development is encouraged to follow the same approach.

1. To improve energy efficiency through thermal and fabric performance improvement measures.
2. Provide on-site renewable energy generation or on-site connected heating, or Combined Heat and Power (CHP) technologies, or Combined Cooling, Heat and Power (CCHP) systems.
3. The remainder of the carbon reduction targets to meet the Building Regulations targets should be met through suitable additional measures.

Developers are encouraged to meet higher standards than those required nationally, and pursue additional low carbon or renewable energy generation measures where practicable.

Compliance with this policy approach is required to be demonstrated through design and access statements submitted with a planning application.

MWE3a Do the proposed policies MWE11- MWE12 represent the most sustainable approach to planning for energy in Medway?

n/a

MWE3b Please explain why you think that proposed policies MWE11- MWE12 do / don't represent the most sustainable approach to planning for energy in Medway

n/a

MWE3c What do you consider would represent a sound alternative strategy for energy in the Medway Local Plan?

n/a



Email:-



Ian Burt
Chairman Medway Countryside Forum



Planning Policy, Regeneration and Culture, Medway Council.

By Email only.

futuremedway@medway.gov.uk

catherine.smith@medway.gov.uk

18th June 2018

Dear Catherine,

Medway Local Plan – Consultation.

Section 3 – Development Strategy

We have concerns that the Sustainability Assessments are not clear and there is no reference to individual sites and potential capacities to make an assessment between scenarios.

Both scenario 1 & 2 indicate a surplus of housing over the Council's assessed need. We need to know what "buffers to protected land" would involve.

Scenario 3 shows only a small shortfall in the Governments proposed calculation of Local Housing Need. We do not agree with the Governments new calculation and believe it to be excessive. Medway has never been able to produce enough housing to meet past predictions and these levels are unrealistic.

Scenario 4.

As stated in section 3.58 The Local Plan should conserve and enhance biodiversity and should not allow development on protected sites. Lodge Hill and Chattenden Woods are designated as a Site of Special Scientific Interest, SSSI, for a variety of Habitats and species both Flora and Fauna.

Medway countryside Forum OBJECT to the inclusion of Lodge Hill and Chattenden SSSI site in the emerging Local Plan. We also object to allocations of residential accommodation in any buffer zone which is required around the Southern Boundary of this site.

Our reasons for objecting to these Housing allocations are:-

1. Urbanisation of this SSSI site and surrounding buffer zone, will cause unacceptable detriment to the species declared in the notice for SSSI. No doubt mitigation can be provided for some of the species but it has clearly been demonstrated, by the failure of previous applications, that Compensation land can not be found for the significant colony of Nightingales found here. It must be noted that this is the ONLY SSSI site designated for Nightingales NATIONALLY!
2. Nightingales, being predominantly ground nesting birds, are highly susceptible to predation by domestic pets and disturbance by Human activity. Urban effects, including lighting patterns, are believed to adversely affect many of the species identified in the notice of SSSI Status.
3. The indicative Master Plan produced by Homes England shows the reduced housing allocation in an area which, last year, recorded a significant number of the whole sites population of Nightingales. Furthermore, the proposed position of housing allocation will be guaranteed to affect the whole nightingale population on this site.

It must be noted that Nightingales are on the RED LIST of Birds of Conservation Concern 4. Last year the national population of Nightingales declined whereas the population at Lodge Hill did not. This further re-enforces the national importance of this site.

In the Sustainable Assessment for scenario 4 it is stated at the end of 3rd paragraph in 5.1.52 that negative assessment could be improved, *"This could be improved through an approach which commits to a monitoring strategy that would identify adverse impacts in a timely manner to allow further remediation or mitigation to take place."* With respect, we have to advise that by the time surveys show adverse effects on the Nightingale population it will be too late! Even if you removed the housing causing the effect it is doubtful that the birds could return due to essential habitat loss.

The NPPF states that *"Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value."* The Lodge Hill and Chattenden SSSI designation is for a multitude of Flora and Fauna species but is the only site in the U.K. designated for its population of Nightingales which puts a very high environmental value on this land.

We are sure that you will remember the conclusion by the inspector at the Examination of the last iteration of the Local Plan which led to the Council withdrawing the whole plan not just the Lodge Hill and Chattenden site. We are sure that any new Examination will conclude that this SSSI site must continue to be protected and must not be included for any development.

We therefore conclude that development is not required on the Lodge Hill and Chattenden SSSI site. As this is the only SSSI site for Nightingales in the UK its inclusion in the Local Plan would destroy the SSSI network for Nightingales. This is contrary to the requirements of National policy in the NPPF.

Yours sincerely,
Ian Burt



Email: -

Phone: -

Ian Burt
Chairman Medway Countryside Forum

Planning Policy, Regeneration and Culture, Medway Council.

By Email only.

futuremedway@medway.gov.uk

catherine.smith@medway.gov.uk

20th June 2018

Dear Catherine,

Medway Local Plan – Consultation.

Thank you for the workshop this morning.

The issues regarding Road & Rail infrastructure for the peninsular were informative but worrying due to the potential of there probably being no progress before the end of the plan period.

I was intrigued by your statement that the Homes England masterplan was for areas outside the SSSI designated area. On checking information available to me I found that 3 of the 5 areas are outside the boundary but the central and eastern block are within the SSSI area. Informal discussion with Natural England representative showed that the areas identified would be Environmentally damaging and he repeated his support for my statement that Scenario 4 should be taken out of the Draft Plan.

I believe that all statements today, from across the representatives, show that the evidence is all pointing to the fact that inclusion of Lodge Hill and surrounds in the Local Plan would be unsustainable and cause the plan to fail at Public Examination. I hope that you can see these issues and remove Lodge Hill and it's surrounds from the draft Local Plan R19 consultation.

Kind regards,

Ian Burt

Yours sincerely,

Ian Burt



19th June 2018

Catherine Smith
Planning manager - Policy
Medway Council

by email

Dear Catherine,

RE: 'Future Medway' Development Strategy consultation

Herewith are Kent Wildlife Trust's comments on the consultation on Medway's Development Strategy.

Scenario 4: Consideration of development within Lodge Hill SSSI

The planning system operates within a clear avoid > mitigate > compensate hierarchy, and within the National Planning Policy Framework there is a presumption against development that would harm a Site of Special Scientific Interest. The Council states in paragraph 3.58 "*Only where development can not be avoided, should mitigation and compensation measures be considered*" It is therefore unclear why Medway have included so much detail regarding Homes England's plans within the consultation document when it is irrelevant at this stage.

Across the four scenarios that the Council have presented, it has clearly demonstrated that the Objectively Assessed Need can be met within the Authority's boundaries without allocating a SSSI. Therefore, with regard to meeting OAN, allocation of Lodge Hill can be ruled out as unsound without further consideration.

As set out in paragraph 3.8, the Government expects the Council to use the proposed 'Standard Methodology' to calculate housing need, so it seems likely that Medway will be required to aim towards a figure higher than that calculated for OAN, which Medway attempts in Scenario 3. We note that Medway have not included Lodge Hill as an allocation within Scenario 3, but nevertheless would remind the council that alternatives would need to be exhausted before Lodge Hill could be considered, including looking in the wider housing market area under the Duty to Cooperate. If that turned out not to be possible, it would then be incumbent on Medway Council to pursue housing provision that is less than the Standard Methodology figure.

Paragraph 118 of the NPPF states: "*...proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made*



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where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;”

Paragraph 3.58 of the consultation document states that “...*the only exception being that the benefits of the development clearly outweigh the impacts on the features of the site, and any broader impacts on the network of SSSIs.*”

The wording in the consultation document is an oversimplification of the test set out in the policy. For the avoidance of doubt, the effect of the planning hierarchy, reinforced by the words ‘*at this site*’ within the NPPF wording, is not that the benefits of development clearly outweigh the impacts, but the benefits of development *at Lodge Hill* clearly outweigh the impacts.

While there may not be an accepted methodology for comparing the disparate impacts and benefits (though of course environmental degradation has an economic cost, as recognised in the Government’s 25 Year Plan for the Environment), an obvious indication comes when comparing the significance of the site to the development proposals; a contribution of less than 7% to Medway’s OAN or around 5% of the Standard Methodology calculations, versus a nationally important and unique area. Even when the proposals were more significant (up to 5,000 houses), the Planning Inspector stated “...*in considering the balance to be struck between all the dimensions of sustainable development I am not persuaded that the social and economic benefits that would flow from development on this site would outweigh the harm to a site of national importance for biodiversity*¹.”

To summarise:

- **Medway have demonstrated that they can meet their OAN without Lodge Hill**
- **Medway have not demonstrated that the further needs suggested by the Standard Methodology cannot be met in the wider housing market area**
- **the benefits of development at Lodge Hill would not outweigh the impacts**
- **In addition, allocation of Lodge Hill would be contrary to other policies NE2 and NE5 within the draft Local Plan (policies that are consistent with the NPPF and 25-Year Plan for the Environment)**

For these reasons Scenario 4 should be ruled out and considered no further.

Hoo Peninsula Rural Town

The wording of the NPPF with regard to SSSIs makes it clear that ‘adverse effects’ of development, individually or in combination, is what is to be avoided, not just direct loss of SSSI. This has implications for Medway’s chosen development option of a ‘Hoo Peninsula Rural Town’ owing to the urbanisation effect of a high number of houses will have. These impacts can reach far beyond the urban boundary.

Paragraph 3.36 states that Scenario 1 ‘*includes buffers to protected land*’ (we assume that ‘protected land’ refers to the SSSI). Though it is not stated, buffers should also apply in the other scenarios. An indication of buffer size is not given, but we assume some caution has been used when calculating the capacity of the ‘Hoo Peninsula Rural Town’ to account for them. Buffer size and

¹ Letter to Medway Council from the Planning Inspector, 21st June 2013, during the Local Development Framework examination.

design should have regard to the sensitivity of the environmental features to the causes of environmental degradation.

Owing to the sensitivity of the SSSI, any development would need to be carefully and strategically planned to avoid harm. We therefore support the requirement for a plan-led approach set out in paragraphs 3.27 and 3.28 should significant development on the Peninsula be taken forward. However, owing to the significant constraint that the proximity of the SSSI presents, as well as the significant opportunity for environmental enhancement and connectivity across the wider peninsula it provides, we are concerned that consideration of this is left to the final sentence of these paragraphs.

Any development of a ‘Hoo Peninsula Rural Town’ should be plan-led, determined by further policy detail such as through supplementary planning documents, and have the protection and enhancement of the environmental features of the Peninsula at its heart.

Natural Environment

We welcome Medway’s commitment to the environment, particularly that set out in Policy NE2 *“The council will promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.”* This is consistent with Government Policy on the Environment set out in the 25 Year Plan and aspirations set out in the Kent Biodiversity Strategy.

The NPPF states that *“To minimise impacts on biodiversity and geodiversity, planning policies should...plan for biodiversity at a landscape-scale across local authority boundaries...identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation...promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.”* We therefore welcome Medway’s commitment to not only securing Green Infrastructure but also embedding net gain principles, and look forward to working with you in future to achieve this.

Awareness of the economic and societal costs of environmental degradation and the loss of Green Infrastructure, as well as the benefits that a healthy natural environment provides, is growing, but still lags some way behind that of ‘grey infrastructure’, or at least perceptions thereof. The ambitions Medway has set itself in the Natural Environment section of the consultation document are not unambitious, and we recommend that the Council give serious thought as to how some of these ambitions may be met, including sources of funding. Given the impacts of urbanisation can reach far beyond the boundaries of the urban area, developer contributions towards Medway’s wider Green Infrastructure would not be inappropriate.

On a more specific matter, paragraph 7.3 refers to ‘Sites of Nature Conservation Interest’. These are now referred to as Local Wildlife Sites and this reference should be updated to be consistent with National and County terminology.

Capstone Valley

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

Sustainability Appraisal and Habitats Regulation Assessment

Scenario 4 would result in the destruction of a significant area of a Site of Special Scientific Interest. It is therefore entirely unclear how the effect of this on Objective 6 ('To protect and enhance biodiversity features') is only assessed as 'Minor negative' in the Sustainability Appraisal (Table 40). A Minor negative effect is defined as "...likely to be limited to small groups of people and receptors and or those with low sensitivity to change...The importance of the receptor is likely to be minor as is the magnitude of the predicted effect." There can be little doubt that the effect on Objective 6 will be 'Significant negative', which "...applies to effects on nationally or internationally important assets... affecting areas or assets with high sensitivity to change. The magnitude of the predicted effects will also be major."

The 'Initial appraisal and recommendations' for Scenario 4 states that "*This scenario advocates for mitigation and compensation of impacts both on and off-site, which seeks to protect vulnerable habitats and species but there is still a risk that mitigation will be unsuccessful. Considering this reasoning in full, the assessment of this Scenario against Objective 6 is negative. This could be improved through an approach which commits to a comprehensive monitoring strategy that would identify adverse impacts in a timely manner, to allow further remediation or mitigation to take place.*" Further recommendations for enhancing the assessment of this scenario (Paragraph 5.1.5.2).

The appraisal for Scenario 1 states "*The Scenario supports new developments to link into a green infrastructure network, but does not mention mitigation for ecological impacts from the use of greenfield land.*" And that for 2 states that it "...does not detail strategies for ecological gain or mitigation against ecological loss through better management of greenfield land, or through the expansion of the rail network and associated infrastructure."

Regarding Scenario 4, paragraph 3.59 of the consultation document states that "*The council has included this potential scenario that involves development on land designated as a SSSI so that a transparent and objective assessment of the impacts arising from potential development can be made as part of the consultation process that informs the new Medway Local Plan.*" However, it is not sufficient that the assessment is 'transparent and objective', Government guidance states that "*The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan*²."

Nowhere else in the consultation document can we find such consideration of the mitigation of constraints for an allocation as in the description of Scenario 4. It is clear from the quotes above that

² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-requirements-for-neighbourhood-plans>

a level of detail significantly higher than that in the other scenarios is being considered. **We are concerned that owing to the ‘availability of information’ through the promotion of Lodge Hill by the landowners Medway are failing to assess the alternatives in the same level of detail, and we strongly recommend that the Council addresses this before coming to conclusions on their preferred option.**

It is clear from the Sustainability Appraisal and Habitats Regulation Assessment documents that a number of the differences between the scenarios are the result of a few particular allocations, for example those sites within the Nature 2000/SSSI Impact Risk Zones. **We therefore expect further refinement of the scenarios to find alternatives and seek to avoid these impacts.** We appreciate that further information may be needed to achieve this, given that the appraisals are based on limited information and are provisional.

General Comments

It is not entirely clear how Medway have progressed from the first stage R18 to this stage. Medway’s responses to representations made on the first stage have not been published, and the available SLA shows many of the proposed allocations as unsuitable. Paragraph 3.33 of the consultation document states that “*The sites and broad locations that have emerged from technical assessments as the most sustainable locations*”. However, it is not clear what ‘technical assessments’ are being referred to.

Owing to this it is unclear why some sites are seen as alternatives to other sites – this is particularly evident in Scenario Four. From the HRA and SLA there would appear to be more obvious alternatives than those presented, at least going by the evidence that has been included with the consultation.

We recommend that Medway more fully illustrate and evidence it’s decision making process before R19 stage so the choices can be understood, and the process made transparent.

If you have any questions please do not hesitate to contact us. We look forward to working with you in the future towards protecting and enhancing the important environment and meeting your development needs sustainably, without Lodge Hill.

Yours sincerely,

Greg Hitchcock

Thames Gateway Officer
Kent Wildlife Trust

[REDACTED]
[REDACTED]
[REDACTED]
T: [REDACTED]

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

By email only: futuremedway@medway.org.uk

19 June 2018

Dear Sir/Madam

MEDWAY LOCAL PLAN DEVELOPMENT STRATEGY REGULATION 18 CONSULTATION

I am writing on behalf of our Client Southern Gas Networks ('SGN') in respect of their landholding at Pier Road, Gillingham, Kent, ME7 1TT, a site plan is appended to this letter. SGN manages a gas network that distributes natural and green gas to approximately 5.8 million homes and businesses across Scotland and the South of England. Advances in technology and changes in gas provision across the country enables gas to be stored within the underground pipes, which makes the existing gasholder structures redundant. In 2013 SGN commenced a programme of decommissioning all of its gas holders, dismantling the existing gas infrastructure and redeveloping sites.

The site is located north of Pier Road and comprises two gasholders and supporting equipment, with an approximate site area of 4.5ha. The site is currently within ownership of both SGN and National Grid, however, both parties are in agreement that this site should be promoted for redevelopment through the Local Plan process.

It is acknowledged that the adopted Medway Local Plan (2003) does not allocate this site for any potential future uses. However, SGN would like to take this opportunity to emphasise that the gas holders at this site have been cut off and decommissioned. The whole site will therefore eventually become vacant and available in the short to medium term for development, following the dismantlement of the gas infrastructure and any necessary remediation works.

Substantial levels of redevelopment has taken place within the vicinity of the site, comprising a mix of employment, residential, retail and leisure uses. Due to the location of the existing site and the character of the surrounding area we consider that the site is appropriate for residential-led mixed use development.

Our representations below have been prepared with the above context in mind and are set out to address the relevant questions with the Development Strategy document.

Question DS1 (Spatial Development Strategy)

Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth? What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

It is stated that: *"The proposed spatial development strategy prioritises regeneration, making the best use of underused and previously developed land and directing investment to urban waterfront and centre opportunity areas. Encouraging the provision of sustainable development in appropriate urban regeneration sites to deliver housing, employment, retail and community uses."*

SGN fully support this proposed spatial development strategy.

Notably, the site at Pier Road accords with this priority of the spatial strategy. It is located in an 'urban waterfront' location where the Council seeks to direct investment, as well as being a vacant and underused area of previously development land. Furthermore, the site is wholly available to come forward for development within the time frame of the emerging Local Plan and provides the Council with an opportunity to contribute towards addressing its housing need, through development of suitable brownfield sites within its administrative area.

Question H1 (Housing Delivery)

Does the proposed policy for housing delivery represent a sound approach? Would you suggest an alternative approach?

SGN is supportive of the proposed housing delivery strategy and agrees that a supply of land is required to meet the needs for both market and affordable housing, in order to meet the objectively assessed housing need. It is also agreed that principles of sustainable development should remain key in the approach for housing delivery in the new Local Plan.

Question E1 (Securing and Strengthening Medway's Economy) and Question E2 (Employment Growth)

Do you consider that this is an effective approach to securing and strengthening Medway's economy? Which locations do you consider are the most appropriate for employment growth?

The need to support sustainable economic growth and job creation within Medway is fully supported by SGN, as is the Council's approach to *"make provision in Medway for the scale, range, quality and locational requirements of employment land....involving safeguarding sites, identification of redevelopment and investment opportunities and allocations for new sites"*.

SGN acknowledge there are several existing employment uses to the west of the Pier Road site. However, the current gas holder site itself is not in employment use and provides no direct contribution towards the economy of the administrative area. When reviewing the location of the site and the variety of uses within both the immediate and wider surroundings, the site is considered to be inappropriate for a sole employment use. In order to optimise the development potential of the site, a residential-led mixed-use scheme that could contribute towards meeting Medway's housing need, whilst enhancing the neighbouring residential and leisure uses. In addition to meeting the proposed Policy DS1 (Spatial Development Strategy).

Conclusion

Overall, SGN are supportive of the Development Strategy and approach being taken by the Council in preparing its new Local Plan. However, we would like to re-emphasise that the site on Pier Road is vacant and available to come forward for development within the new Local Plan. To ensure that the development potential of the site is optimised, it is considered that the site should be designated for residential-led mixed use development within the new Local Plan. The site could contribute towards the delivery of housing on sustainable brownfield sites within the administrative area.

It trust you find the above comments useful at this stage, however, should you require any additional information please do not hesitate to contact myself or my colleagues Adam Conchie [REDACTED] or Ruby Wilkinson [REDACTED]

In the meantime, I would be grateful if you could continue to keep me informed of progress of the Local Plan.

Yours Faithfully

[REDACTED]

Alister Henderson
Partner

E: [REDACTED]
T: [REDACTED]

Enc. Site Location Plan

Site Location:



The council is preparing a new Local Plan to set out how the area will develop to 2035. We are now consulting local people on how the plan will support the council's vision of 'growth for all'.

We want to hear from residents, businesses, local organisations, community and interest groups to help create the best possible version of Medway. So it is important you take this opportunity to have your say on how Medway should grow.

The consultation period is from Friday, 16 March 2018 until 5pm on Friday, 11 May 2018.

The plan will ensure the area has enough new homes, jobs, and infrastructure to support the expected population growth. It will also focus on preserving Medway's environment and heritage.

Our challenge is to do this in a way that achieves sustainable growth. We need to balance this with the need for homes, jobs and services while conserving our natural and historic environments.

Comprehensive details of how the area might look in coming years can be seen in the Development Strategy consultation document. An introduction to the council's proposed approach to growth in Medway has been published and summarises the four scenarios for how the area could develop.

How can I find out more?

The Development Strategy consultation document is not just about land for housing. The main Development Strategy document is a detailed technical report that sets out the issues Medway faces and draft policies on how we could best address them. It looks at a number of important themes:

- Housing
- Employment
- Retail and centres
- Natural Environment and Green Belt
- Built environment
- Health and communities
- Infrastructure
- Transport
- Minerals, waste and energy

You can find out more:-

Online

You can view the Development Strategy, supporting documents and new, detailed maps of all four scenarios on the council's website at: medway.gov.uk/futuremedway

We have also produced some further summary information about what the development proposals may mean for regeneration, a rural town on the Hoo Peninsula and wider growth in suburban and rural areas.

Links to each section of the Development Strategy are included throughout this consultation form.

Printed copies

You can view a copy of the main report at the reception desk of the council offices at Gun Wharf, public libraries and community hubs across Medway. You can find details of the locations and opening hours of these buildings at: medway.gov.uk. You can also use the public libraries to view the additional information on the council's website.

How can I make my views known?

If you would like to make comments on the proposals in the Development Strategy document, you must submit them in writing by 5pm on Friday 11 May 2018. You can respond in the following ways:

Online: Using this form

The consultation form is designed to allow you to make comments about each of the different things the council has to consider when developing the Local Plan.

For each section there is the opportunity to give your views, and if you wish, to answer the questions that are asked throughout the technical document.

Alternatively you can submit your response

By email: futuremedway@medway.gov.uk

By Post to:

Planning Policy Team

Regeneration, Culture, Environment and Transformation

Medway Council

Gun Wharf

Dock Road

Chatham

Kent ME4 4TR

Your comments and contact details

We will record all written comments as part of the process of preparing the new Local Plan. At the close of the consultation we will review all comments received, look at the key issues raised, and take these into account in working to the next stage of the draft.

All comments will be published on our website - personal details such as addresses of individuals will be removed. We will keep your details on our records and keep you informed about further work on the Local Plan.

We will not share your details, or use them for any other purposes. The responses and contact details will be kept as part of the formal record of the preparation of the Local Plan. This will be for a minimum of five years.

Medway Council will keep the information provided above as confidential. Access to, retention and disposal of this information will be strictly in accordance with data protection requirements. Your personal data will be processed in accordance with Medway Council's Data Protection notice.

If you do not wish to be informed about the work on the Medway Local Plan, please tick here.

Full Name **Chris Fribbins (Dickens Country Protection Society)**

Email Address

[REDACTED]

Address

[REDACTED]

Type of Consultee - please select the option that best describes you

Amenity Group

Planning positively for Medway's successful future

Growth for all

The council's vision is to achieve 'growth for all' to make Medway an excellent place to live, work, learn and visit.

Medway's population has grown by more than 10,000 people since 2012 to 278,542 in 2016. By 2035 our population could be more than 330,000 people. If we do not plan properly for our growing and changing population there will be greater pressures on:

- Housing - the council knows Medway needs 29,500 new homes by 2035. A government formula may mean this figure goes up to 37,000. We need to identify a housing target for the plan.
- Local services, such as schools and health centres.
- Growth in the local economy- this will be held back and if we do not plan for growth, development will happen on a piecemeal basis.

We also need to promote development that will help to:

- Boost our local economy
- Improve the health of residents
- Address decline in town centres
- Provide new services and infrastructure
- Create a flourishing and attractive environment

Planning positively for Medway's successful future

Medway is a complex and diverse area. A large urban area has grown up between the river and the Kent Downs. There are wide tracts of remote countryside, strategic industrial, energy and transport facilities and good quality farmland. A third of land is of international or national importance for wildlife.

The Local Plan sets out a vision for Medway in 2035 as a leading university waterfront city of 330,000 people, noted for its revitalised urban centres and its stunning natural and historic assets and countryside. It sets ambitions for:

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

You can find out more in the Vision and Strategic Objectives for Medway in 2035 section of the consultation document.

Development strategy

The development strategy section outlines the approach taken to planning for the area's growth, across urban, suburban and rural areas, and sets out four alternative approaches to how Medway could grow to meet the aims of the Local Plan. The council has no preferred option at this stage.

We are approaching growth plans in the following way:-

1. Promoting the regeneration of urban waterfront and town centres

The Local Plan vision places regeneration at the heart of Medway's development strategy.

Regeneration of existing areas is a priority of the Medway strategy for growth. We continue to transform our urban waterfront and bring forward rejuvenation and improvements in some of the town centres.

The redevelopment of underused sites along the urban waterfronts and centres makes the best use of brownfield land and provides opportunities for homes, jobs, services, community and leisure activities and new public spaces.

The council has set out its ambitions for regeneration in our vision document Medway 2035, which promotes a successful economy and growth with benefits for all. You can find this document online

As well as the regeneration of the urban waterfront sites, the plan also promotes opportunities for new development in parts of town centres. This could include new housing, boosting the number of people living in the centres and supporting local shops, services and restaurants. New businesses could be attracted to sites near the town centres.

2. A rural town on the Hoo Peninsula

Local people have told us that they are concerned about pressures on infrastructure. They want to see new housing supported by upgrades to local services and facilities. The council has responded by looking at what growth options give the best scope for improvements in infrastructure. We consider that focusing growth into a small rural town around Hoo St Werburgh would bring these opportunities for new infrastructure. Development of new employment sites as part of the rural town, and nearby sites at Kingsnorth, could help to boost the area's economy.

As well as a mix of housing types, a rural town could provide new country parks, schools, leisure centre, health facilities, new jobs and shops. New transport links could include the opening of a passenger rail service on the Hoo Peninsula. The rural location demands the greatest care in planning for growth to respect the special qualities of the environment and to keep a rural character.

3. Wider growth

A mix of smaller sites in suburban areas, around Rainham and Capstone and other villages, are proposed to provide a range of housing sites. These are of a smaller scale, reflecting difficulties in addressing infrastructure and environmental issues.

The council wants to avoid unchecked growth of the suburbs, which could undermine our ambitions to revitalise town centres and lead to more car based travel. We will also continue to resist inappropriate development in the Green Belt to the west of Medway.

Development strategy

Development scenarios

Each of the four scenarios has a map showing potential developments, you can see where these potential developments are by clicking the link in the descriptions below. The four scenarios all share these common elements.

Homes will be supported by:

- New and expanded schools
- Health facilities
- Leisure and community centres
- Transport upgrades
- Riverside walks
- Parks and play areas

The growth around Hoo would include two new country parks, employment areas, new shops and services, and transport links and services.

Scenario 1: Meeting the housing need of 29,500 homes

Scenario 1 is based on the council's analysis of the number of homes needed to support the area's population growth and change up to 2035. The strategy seeks to firstly direct growth to brownfield regeneration sites. About half of the growth would take place on urban sites where we can make the best use of land. A rural town and some village expansions on the Hoo Peninsula would provide for the improvements in infrastructure to support a wide mix of development. These areas could meet over a third of the growth needed. About a sixth of development would be spread across sites in suburban areas and smaller villages.

It does not involve development on land designated for its environmental importance at Lodge Hill. There would be some buffers of undeveloped land next to these protected areas.

This scenario could deliver about 16,500 new homes on the sites identified in the map. Given the existing 'pipeline' of development, and windfall sites not identified on specific sites, a total of 29,950 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 9,318 homes

Suburban sites: 4,528 homes

Scenario 2: Investment in infrastructure to unlock growth

Scenario 2 - Growth of a rural town on the Hoo Peninsula is dependent on new infrastructure and services. The council is working to secure major funding to upgrade transport and other services in the area. This includes the potential use of the Grain freight railway line on the Hoo Peninsula for passenger services. If we were successful in getting a new train service for the area, this could open up opportunities for new jobs and different approaches to design. We could develop at higher densities in specific locations that are well connected to a new station.

The higher and faster rates of housing delivery in this scenario would reduce the need to release land in some suburban locations. Over 40% of growth would be on the Hoo Peninsula. In comparison with Scenario 1, this would remove land in the Capstone Valley and to the north of Rainham from proposed development allocations.

The higher density rates would boost the number of homes that could be built in the area. This scenario could deliver about 17,500 new homes on the sites identified in the map above. Given the existing 'pipeline' of development and windfall sites, a total of about 31,000 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 11,750 homes

Suburban sites: 3,179 homes

Scenario 3: Meeting government's target of local housing need of 37,000 homes

Scenario 3 - The council has looked at options for how we could reach such a large increase in the land needed for housing to meet the government's target. However, the Local Plan is not just about housing but balanced growth. To find more land for housing we would need to see more of the potential regeneration sites come forward for development. This could include the loss of some employment sites for housing developments. We would also need to release more land in suburban locations, such as to the east of Rainham, and this would make up about a fifth of total growth.

This scenario could deliver about 22,500 new homes on the sites identified in the map above. Given the existing 'pipeline' of development and windfall sites, a total of 35,960 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 14,194 homes

Hoo Peninsula: 12,162 homes

Suburban sites: 6,276 homes

This scenario involves much higher levels of growth in all areas, and would need careful planning and substantial funding of service improvements to deliver sustainable development.

Scenario 4: Consideration of development within Lodge Hill SSSI

Scenario 4 -Previous stages of consultation on the Medway Local Plan referred to the possible use of land at Lodge Hill for a new settlement on the Hoo Peninsula. This involved development on land designated as Site of Special Scientific Interest (SSSI) for its environmental importance. The proposal related to a planning application, which has now been withdrawn. Homes England, the government's regeneration agency, now owns the site. It is preparing a new planning application for a smaller scheme for up to 2000 homes with supporting services. Some of the development would involve building on the SSSI land. Homes England is proposing a scheme where the majority of land would be protected from development. This would include land managed for nature conservation and some new public open space. Development would provide homes as well as the funding to remove unexploded ordnance and manage other land for nature conservation.

The additional land at Lodge Hill would remove the need to allocate some land for development in Stoke and in the Capstone Valley.

This scenario could deliver around 17,000 new homes on the sites identified in the map above. Given the existing 'pipeline' of development including windfall sites, a total of 30,500 homes could be built by 2035.

Breakdown of housing:-

Urban sites: 12,775 homes

Hoo Peninsula: 10,357 homes

Suburban sites: 4,108 homes

Development strategy

Q1 Thinking about our approach, the scenarios and the development strategy section, please answer the following question.

When developing the Local Plan what things do you think the council should consider about the scale of the development needed to support Medway's growth and provide sustainable development?

While accepting the existing growth in population of the Medway Towns there appears to be insufficient consideration of the existing issues for local residents or the pressures that this would bring to the area. There has been a focus on new housing figures by government without an assessment of the local constraints and issues that need to be addressed.

Although there are references to infrastructure issues, there is little detail regarding the specific requirements and which are required for developing relevant sites, or the constraints that this would place on the number of units that could be developed. Masterplan development is required before any assessment can be made on the sustainability of these local plan site proposals. In particular an indicative masterplan of changing Hoo St Werburgh from a large village to a small town is required as this is present in all the scenarios. Connectivity with other villages on the Hoo peninsula is also required as much of the infrastructure is already shared and will be more reliant if these developments proceed.

We have a major concern about the deliverability of the housing demands and the related infrastructure. The number of housing units across the plan area per year is more than the area has ever managed to deliver in recent decades. The government have also indicated the possibility of 'sanctions' if this rate is not achieved and there is concern that speeding this up may jeopardise the delivery of necessary core infrastructure, through reduced requirements on new developments to increase the rate of delivery.

Recent developments (outside of the 2013 village boundaries) approved on the Hoo Peninsula (outside the 2013 Local Plan village boundaries) are missing from consultation maps and the impact of these does need to be considered alongside the new proposals. There are also no indicative figures on the number of housing units for each of the sites proposed.

We are also concerned to see no land allocation for major health facilities on the west side of the River Medway. The previous consultation stage mentioned this as a need for the area – access to facilities at Medway and Darenth Valley Hospitals is already an issue during the day for both patients and visitors from the Hoo Peninsula.

Without a response to these issues, there is difficulty in assessing the sustainability of the plan and the impact on current and future residents is likely to be negatively affected.

There needs to be more support, and need, for high quality agricultural land which forms natural barrier between villages and helps provide the food that the country needs in the future to feed the growing population. A clear policy to protect this is needed.

There are technical questions asked about the following development strategy policy approaches:-

- Sustainable Development

- Spatial Development Strategy

Development strategy

Policy DS1: Sustainable Development

The purpose of planning is to achieve sustainable development. When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Planning applications that are in conformity with the Medway Local Plan (and where applicable, with policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date, the council will grant permission, unless material considerations indicate otherwise, and considering whether:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in the NPPF indicate that development should be restricted.

Policy DS2: Spatial Development Strategy

The council will seek to meet the development needs for homes, employment and retail land, infrastructure and services, as determined by the evidence base set out in the Medway Local Plan, whilst respecting the need to conserve and enhance the natural and built environment.

The development strategy for Medway prioritises regeneration, making the best use of underused and previously developed land and directing investment to urban waterfront and centre opportunity areas. The council will encourage sustainable development in appropriate urban regeneration sites to deliver housing, employment, retail and community uses, establishing a quality and accessible public realm, including the extension of a riverside walk. Chatham will provide the focus for new retail and community facilities. Appropriate opportunities to capitalise upon the learning quarter at Chatham Maritime will be positively considered.

Outside of the regeneration areas, the council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting and supported by significant infrastructure investments. The development will be in accordance with a masterplan, to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to a range of services and infrastructure.

The council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.

Strategic green infrastructure zones throughout urban and rural Medway will promote a natural capital approach, and secure benefits for nature and people and provide separation of settlements.

DS1a Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

Yes

No

DS1b Please explain why you think proposed spatial development strategy does / doesn't represent the most sustainable approach to managing Medway's growth

By failing to identify the specific infrastructure interventions that would be required to support a small town at Hoo St Werburgh and their delivery, there cannot be any assurance that the proposed scale of development is sustainable.

There are already concerns about the capacity road system (A228/Four Elms Roundabout/A289 Bypass/Frindsbury Hill) to support the housing that has already been approved and the additional housing numbers (although site allocations have to be assumed as they are not published) as well as commercial developments that are already taking place and assumed as part of the plan).

Health facilities are under pressure (and access to hospitals in Gillingham or Dartford) will be compromised by this scale of development. Although buildings can be provided there is little confidence that the required skilled staff can be recruited to run them. In fact, there are examples of some medical facilities that are underused because of this already.

Residents do also have concerns about the provision of water (and sewage), electricity, gas and mobile phone/broadband services already.

DS1c What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

A more detailed infrastructure plan is required (and a master plan of the Hoo St Werburgh small town with connections to the other local villages).

Town Centre sites should be re-assessed to see if further housing capacity can be encouraged (in particular with reference to the drop in retail premises and the existing infrastructure and need to support and grow community facilities for the existing population.

Housing

This section provides details of Medway's housing need, with a main Housing Delivery policy and nine supporting housing policies to help get the right mix of housing required in Medway to accommodate a growing population with diverse needs.

Q2 Thinking about the Housing section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's housing needs?

Infrastructure – especially highways peak capacity issues at the A228/A289 roundabouts (Sans Pareil and Four Elms, Health and specific Education facilities need to be addressed before the level of housing can be assessed as sustainable.

There are technical questions asked about the following housing policy approaches:-

- Housing Delivery
- Housing Mix
- Affordable Housing
- Supported Housing, Nursing Homes and Older Persons Accommodation
- Student Accommodation
- Mobile Home Parks
- Houseboats
- Houses of Multiple Occupation (HMOs)
- Self-build and Custom Housebuilding
- Gypsy, Traveller and Travelling Showpersons

Housing Delivery

Policy H1: Housing Delivery

The council will determine a housing target for the Medway Local Plan, responding to the latest relevant information, in preparing its draft Local Plan.

The council will seek to provide a supply of land 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.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.

Development of a strategic allocation for a rural town on the Hoo Peninsula will be in accordance with the council's development framework for Hoo.

H1a Does the proposed policy for housing delivery represent a sound approach?

~~Yes~~

No

H1b Please explain why you do / don't think the proposed policy for housing delivery represent a sound approach

The policy cannot be fully assessed without the Masterplans, coordination of infrastructure and service provision. The idea of a small town at Hoo St Werburgh was part of the 2017 consultation on the Development Strategy but the provision of services appears to have regressed with no land use allocation for a significant health facility on the western side of the River Medway, or schools (both which would have significant additional pressures on the local road network). Allocation of specific sites (as proposed in this consultation) is flawed without more detail on the infrastructure interventions.

The consultation is also not up to date with significant, recent, housing developments included in the consultation and already creating infrastructure demands and other pressures (especially around Hoo and Chattenden)

The deliverability of these housing numbers also needs further investigation. If delivery falls behind the level required to achieve the numbers indicated in the plan there will be more pressure to develop faster (and cheaper) and infrastructure and community facilities may be dropped or down-graded.

H1c Would you suggest an alternative approach?

A more detailed investigation into the capacity of the Hoo Peninsula and Town Centre sites is required as well as Masterplans and Infrastructure needs before this level of development can be accepted as sustainable.

Housing Mix

Policy H2: Housing Mix

The council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population.

Residential development will be permitted to encourage a sustainable mix of market housing to include an appropriate range of house types and size to address local requirements.

The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

Accommodation requirements as detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform which house sizes and mix should be delivered in urban and rural areas to meet the objectively assessed needs of the area.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council's housing register and discuss affordable housing requirements with the council's Housing Strategy team at the pre-submission stage of the planning process.

Large development schemes meeting the criteria set out at Policy H9, must demonstrate that sufficient consideration has been given to custom and self-build plots as part of housing mix.

The council will work with partners to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people.

Gypsy, Traveller and Travelling Showpeople accommodation requirements will form part of the borough's need for housing.

H2a Does the proposed policy for housing mix represent a sound approach?

~~Yes~~

No

H2b Please explain why you do / don't think the proposed policy for housing mix represent a sound approach.

There is little identification or allocation of sites for specific local community needs rather than Medway wide. Low cost and affordable housing is a broad-brush approach and often leads to housing being allocated to people from outside of the area through Housing Associations, above local need.

H2c Would you suggest an alternative approach?

More recognition of local community needs (especially in parished areas).

Affordable Housing

Policy H3: Affordable Housing

On housing and mixed use development sites of 15 or more residential units the council will require the delivery of affordable housing.

The council will apply the following requirements for affordable housing provision:

- in rural Medway 30% of all residential units for developments of 15 or more dwellings
- in urban Medway 25% of all residential units for developments of 15 or more dwellings

Provision must be in accordance with the council's Guide to Developer Contributions and Obligations.

There will be a strong presumption in favour of the affordable homes being fully integrated within the proposed development. However the council may consider off site provision, where this enables other policy objectives to be met, subject to an equivalent level of developer contribution being provided.

Where affordable housing is to be provided offsite, the council's preferred position is for developers to directly providing affordable dwellings on an alternative site. Only where it can be demonstrated that this can not be provided, would the council consider a financial contribution from the developer which would enable provision through new build on an alternative site.

H3a Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision?

Agree

~~Disagree~~

H3b Please explain why you agree / disagree with threshold for contributions for affordable housing and the percentage requirements for its provision.

Caution must be exercised where developers agree an allocation, but then return to argue that the economics of the scheme have changed.

H3c What do you consider would represent an effective alternative approach?

H4 What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

This needs to be driven by more local needs. Schemes to lock in the low cost/affordable element should be given priority (perhaps providing technical and admin support to local communities, especially parish councils) to provide these.

Supported Housing, Nursing Homes and Older Persons Accommodation

Policy H4: Supported Housing, Nursing Homes and Older Persons Accommodation

The development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:

- Meets a proven need for that particular type of accommodation.
- Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs.
- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.
- Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.

Loss of specialist housing will be permitted only where it is demonstrated that there is no need for the form of accommodation.

H5a Do you agree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?

Agree

~~Disagree~~

H5b Please explain why you agree or disagree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation.

The only concern is the loss of this form of specialist housing in recent years and the need to provide extra to cover the shortfall.

H6a Do you consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs?

Yes

~~No~~

H6b Please explain why you do / don't consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs

Although there is a place for retirement villages etc. they should be integrated with the local community – perhaps through the development of facilities shared with the local community.

H7a Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme?

Yes

~~No~~

H7b Please explain why you do / don't consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme

This scale of housing would create a scale of development that would help the viability of a scheme rather than stand-alone.

Student Accommodation

Policy H5: Student Accommodation

The council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.

Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need.

The council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, and does not have a negative impact on the core functions of the town centres, and is consistent with strategic redevelopment plans.

These locations must be well served by public transport and accessible to a wide range of town centre, leisure and community uses.

Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land or leisure or community space.

Student housing will be required to provide a high quality living environment and include a range of unit sizes and layouts with and without shared facilities to meet requirements of the educational institutions they serve.

H8a Do you agree with the proposed policy for student accommodation?

Agree

~~Disagree~~

H8b Please explain why you agree or disagree with the proposed policy for student accommodation.

Student accommodation can be very supportive of the town centre economy.

H8c Would you propose an alternative approach?

n/a

Mobile Home Parks

Policy H6: Mobile Home Parks

Proposals for mobile or park home developments will be given the same consideration as other dwellings and will be subject to the same compliance with planning policy in assessing impact and sustainability.

The council seeks to protect existing parks from competing uses, but restrict their expansion outside designated areas. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area particularly those near areas of sensitive environmental interests.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home Park, or a reduction in the area available for their use will not be permitted.

The council will set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

Any proposals for updates or intensification must have careful consideration for the colour, massing and materials used, incorporate appropriate landscaping and have no adverse impact on the character of the locality or amenity of nearby residents.

H9a Do you agree with the proposed policy for mobile home parks?

Agree

~~Disagree~~

H9b Please explain why you agree or disagree with the proposed policy for mobile home parks.

There is a need for this class of housing, although it should be integrated with the local community where possible and any expansion should provide support for shared wider community facilities.

H9c Would you propose an alternative approach?

n/a

Houseboats

Policy H7: Houseboats

The council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim:

- To protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place.
- To specify criteria under which any further growth of houseboats will be allowed in order to minimise impact.
- To seek the removal and disposal of any vessel so moored if a boat sinks, or becomes unfit for habitation, derelict, or is otherwise abandoned.
- To seek opportunities to deliver improvements that benefit the local amenity and environment.

H10a Do you agree with the proposed policy for houseboats?

Agree

~~Disagree~~

H10b Please explain why you agree or disagree with the proposed policy for houseboats

n/a

H10c Would you propose an alternative approach?

n/a

Houses of Multiple Occupation (HMOs)

Policy H8: Houses of multiple occupation

The council seeks to avoid detrimental over concentrations of HMOs. Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where they:

- Do not adversely affect the character and amenity of the area, or the supply of family housing.
- Do not contribute to the over concentration of HMOs in a particular area.
- Do not contribute to the generation of excessive parking demands or traffic in an area.
- Make appropriate provision for the storage of waste

H11a Do you agree with the policy approach for HMOs?

Agree

~~Disagree~~

H11b Please explain why you agree or disagree with the policy approach for HMOs.

n/a

H12a Do you consider that the council should set locational criteria for HMOs, such as consideration neighbouring uses and proximity to other HMOs?

Yes

~~No~~

H12b Please explain why you agree or disagree that the council should set locational criteria for HMOs.

n/a

H13a Should the council make use of Article 4 Directions to restrict the ability to convert properties to HMOs?

Yes

~~No~~

H13b Please explain why you agree or disagree that the council should make use of Article 4 Directions to restrict the ability to convert properties to HMOs

n/a

Self-build and Custom Housebuilding

Policy H9: Self-build and Custom Housebuilding

The council will support self-build or custom build home development in sustainable and suitable locations.

To identify and provide for people who wish to build their own home, the council will maintain a register of interested parties and report the headline data annually on the council website after the end of each base period.

All new self-build/custom housebuilding applications

- Applicants will need to have regard to the local landscape and guidance from other relevant Local Plan policies in the same way that other types of residential applications do; this will ensure all types of new development are of high quality.
- If the number of self build plots on a single site exceeds 10, then a design code framework should be agreed with the council prior to the submission of individual planning applications. This will ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality.
- In accordance with Government guidance on Self-Build and Custom Housebuilding, the plots must be serviced (have access to a public highway and connections for electricity, water and waste water) or, in the opinion of a relevant authority, can be provided with access to those things within the duration of a development permission granted in relation to that land.
- Where a land owner has a suitable small site that they wish to obtain speculative outline residential permission for, they are encouraged to consider the plot for self-build or custom housebuilding, depending on the local demand.

Expanding/intensifying existing residential permissions

Where there is an existing residential permission and the developer approaches the council seeking to expand/intensify the development, the developer should demonstrate that they have considered some/all of the additional plots to be provided as serviced self/custom build plots, where there is identified demand.

Neighbourhood Plans

The council supports the consideration of self-build and custom housebuilding in the preparation of Neighbourhood Plans, and joint working with Neighbourhood Plan groups to establish a locally derived design code.

Council owned land and Regeneration

The council will consider opportunities for self-build housing in disposal of Council land and in promoting regeneration schemes.

H14a Do you agree with the self build and custom housebuilding approaches taken above?

Agree

Disagree

H14b Please explain why you agree or disagree with the self build and custom housebuilding approaches taken above

n/a

Self-build and Custom Housebuilding

Self Build Site Allocations

In considering site suitability, some sites have been identified from the Strategic Land Availability Assessment (SLAA) as having potential for self build and/or custom housebuilding use. Some of the larger sites may have potential for a proportion of the area to be suitable for self/custom build. The Council may seek to secure planning permission on any sites allocated for self/custom build by way of Local Development Orders after the Local Plan is adopted.

H15a Do you think that the council should allocate specific sites for self/custom housebuilding development?

~~Yes~~

No

H15b Please explain why you agree or disagree that the council should allocate specific sites for self/custom housebuilding development.

Sites may become available across the area and considered as they arise in accordance with these policies. There will need to be protection to avoid the principle of self-build being used to establish residential use (due to its special nature/allocation) and then a subsequent general housing development (probably at a higher density) coming forward and being developed instead.

If we do allocate self/custom build sites, we will advertise them on our website. The land owner would also be expected to market the site. When allocating a site/part of a site for self/custom build, it is important that there is realistic expectation of interest in the site. However, due to circumstances out of the control of the council and land owner, the site may not receive the interest that had been anticipated. We therefore propose that once an allocated site has sold and built out a certain proportion of the self build plots, if the land owner is unable to sell the remaining plots after marketing them for a further period of time (to the satisfaction of the council), they will then be allowed to firstly offer the plot(s) to the council/housing association, before being allowed to build out on the plot themselves or sell to a non self/custom builder/developer.

Yes

~~No~~

H16b Please explain why you agree or disagree with the approach set above

n/a

H16d After what further period of time of unsuccessful marketing do you feel it would be acceptable to offer the remaining plots on to the council/housing association or other non self/custom builders?

1 years

Self-build and Custom Housebuilding

Sites over 400 dwellings

In order to satisfy the demand from the register, we propose that applications on sites over a certain number of dwellings should make available at least 5% of the plots to self/custom builders for purchase. We suggest a threshold of 400 dwellings and over. The developer will need to provide robust evidence to demonstrate if this is not economically viable. This would apply to applications on new Local Plan housing allocations or windfall sites.

H17a Do you agree that sites over a certain size should offer a percentage of the plots to self/custom builders?

Yes

~~No~~

H17b Please explain why you agree or disagree that sites over a certain size should offer a percentage of the plots to self/custom builders

n/a

Following on from the question above, if a plot has been marketed (to the satisfaction of the council) for 12 months and not sold, we propose that it can then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market.

H18a Do you agree with this approach outlined above?

Agree

~~Disagree~~

H18b Please explain why you agree or disagree with this approach

n/a

With regards to these large sites of 400 dwellings or over, in order to prevent the completion of the overall site from being drawn out, exposing existing residents to extended periods of construction by their neighbours, we propose that if a plot is purchased by a self or custom builder, the dwelling must be built within 3 years of the date of sale, before being offered to other applicants on the self build register to purchase. If there is no interest, then it may then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. The onus would be on the developer to advise the council when each plot had been sold in order to monitor the development.

H19a Do you agree with this approach outlined above?

Agree

~~Disagree~~

H19b Please explain why you agree or disagree with this approach

n/a

Gypsy and Traveller Accommodation

Policy H10: Gypsy, Traveller and Travelling Showpersons

Safeguarding Existing Sites

Existing permanent authorised gypsy and traveller sites and sites for travelling showpeople will be retained, unless:

- There is a surplus of available accommodation over and above the required five year supply of sites, or,
- The site will be replaced by a site of similar proportions in an appropriate location which complies with the criteria listed below for new sites, or,
- A site has been granted a personalised permission restricting residency to a named occupier or family.

New Sites

Proposals for new gypsy, traveller and travelling showperson sites (temporary or permanent) will be permitted, in accordance with the council's planning policies if they meet the following criteria:

- Need – the council is satisfied that there is a clear need for the site and the proposal cannot be met on existing available sites or an allocated site
- Location – within an accessible walking distance to local facilities for education, healthcare, and convenience retailing.
- Not located in the Green Belt, flood risk zones 2 & 3, areas covered by landscape or environmental designations (AONBs, SSSI, Ramsar, SPA, SACs, Ancient Woodland or local nature reserves), protected open spaces or protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas), or the best and most versatile agricultural land, of Grades 1, 2 or 3a).
- Scale – a site should respect its location and surrounding environment and be embedded within it and not intrude onto the landscape. The council will require a landscape strategy as part of the application to confirm the details of this.
- Pitches and plots should be of a sufficient size and, on sites for Travelling Showpeople have space for adequate storage.
- Access – there is safe and convenient pedestrian and vehicular access to the public highway, with adequate space on site for vehicle turning and parking

H20a Does this represent a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs?

Yes

~~No~~

H20b Please explain why you agree or disagree that this is a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs

n/a

H21a Do you consider that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan?

Yes

No

H21b Please explain why you agree or disagree that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan

More detailed site investigation and assessment will be required before any site can proceed. A policy should be developed that outlines acceptable criteria.

Employment

This section sets the context of Medway's economy, with details of land needed for employment sites, and how we can boost the local economy, particularly in securing better quality jobs and benefiting from links with our universities and colleges. These inform the main 'economic development' policy and Medway's key economic sectors including the rural economy and tourism including associated visitor needs.

Q5 Thinking about the employment section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's economic needs?

The infrastructure needs, especially transport will be key to meeting economic needs. The needs of the wider area will also contribute to a positive environment for economic development.

There are technical questions asked about the following employment policy approaches:-

- Economic Development
- Rural Economy
- Tourism
- Visitor Accommodation

Economic Development

Policy E1: Economic Development

The council will seek to boost Medway's economic performance, securing a range of jobs for its workforce. The council will work positively with the local business community and major public sector employers, the Universities at Medway and further education providers, inward investors, strategic partnerships and neighbouring authorities to support sustainable economic growth and job creation.

The council will make provision in Medway for the scale, range, quality and locational requirements of employment land identified in the Employment Land Needs Assessment, 2015, or subsequent updated evidence. This will involve the safeguarding of sites, identification of redevelopment and investment opportunities, and allocations for new sites.

The plan will seek to increase the productivity of Medway's economy, as measured through GVA, through support for higher value employment. This will include the designation of specific employment sites as suitable for higher value employment. All planning applications for employment uses will be assessed for their GVA contributions and whether the proposed use is best aligned to the site characteristics and locational offer. The council and its partners will promote growth of employment sectors that have the best potential for higher value jobs.

The council will support actions to:

- Consolidate economic benefits from the regeneration programme in Medway, specifically seeking to strengthen the role of the town centres in providing wider job opportunities;
- Raise skills levels and provide apprenticeship and local labour opportunities;
- Realise opportunities for raising higher value employment through supporting the development of the Universities at Medway and the wider learning quarter, and linking to growth in the wider economy;
- Seek to accrue benefits for Medway's economy from strategic developments of infrastructure, housing and employment sites outside of the borough;
- Explore the extension of the successful Medway Innovation Centre model to provide additional serviced employment space for businesses;
- Seek the installation and upgrade of high speed broadband services in employment sites;
- Promote the diversification of Medway's economic base; and
- Secure sustainable employment uses for the strategic sites at Grain and Kingsnorth, achieving value from the specific location offer and the access to water and rail for freight movements, and realising opportunities for manufacturing of modern modular construction facilities.

E1a Do you consider that this is an effective approach to securing and strengthening Medway's economy?

Yes

No

E1b Please explain why you think that this is / is not an effective approach to securing and strengthening Medway's economy

It is relatively easy to allocate employment land, but difficult to fill (some of the site identified have been identified for decades but remain undeveloped).

An approach to assess the impact on local infrastructure needs, environmental and landscape impacts needs to be enhanced and incorporated with other pressures. There may also be pressure on schools/nurseries and employees seek provision close to their place of work.

E2 Which locations do you consider are the most appropriate for employment growth?

n/a

E3a Do you agree with the proposed approach to assessing GVA with planning applications for employment uses?

Yes

~~No~~

E3b Please explain why you agree or disagree with the proposed approach to assessing GVA with planning applications for employment uses

Supported, although appropriate small sites in or adjacent to villages should also be considered.

E4a Do you support the proposed approach for higher value jobs in Medway?

Yes

~~No~~

E4b Please explain why you support / do not support the proposed approach for higher value jobs in Medway

n/a

E5a Do you consider that there is demand for further serviced office accommodation in Medway?

Yes

~~No~~

E5b Please explain why you consider / do not consider that there is demand for further serviced office accommodation in Medway

With the growth in home-based employment, support facilities should be developed in local communities (villages) to provide a wide range of local services above just serviced offices.

Rural Economy

Policy E2: Rural Economy

The council will support the land based sector in Medway, through seeking to direct development to land of lesser agricultural land, where feasible, and promoting the sustainable development and diversification of farming and other land based rural businesses, where the proposals can demonstrate positive benefits and do not conflict with other policies in the Local Plan. The council will define countryside areas outside of the urban and village settlement boundaries, where the land based economy will be supported providing that it does not conflict with requirements to conserve and enhance the environment.

The council will support the growth of rural businesses in well-designed development in appropriate locations that respect the character of the countryside and environmental features. Sustainable rural tourism and leisure activities that are in keeping with their rural setting will be supported.

The council will seek the retention of key rural services and facilities to promote sustainable villages, providing for the needs of rural residents.

E6a Do you agree with the proposed policy approach for the rural economy?

Agree

~~Disagree~~

E6b Please explain why you agree / disagree with the proposed policy approach for the rural economy

Support for rural businesses will also require more local support and services (see E5a)

E6c What alternative approaches would you propose?

n/a

Tourism

Policy E3: Tourism

The council will positively promote sustainable tourism development that can make a positive contribution to Medway's economy and cultural life. Appropriate proposals for the development of tourism facilities and visitor accommodation will be supported where they meet the principles of sustainable development.

Tourism developments that can contribute positively to the regeneration of Medway, consistent with the council's vision, and extend the cultural offer will be considered favourably. Opportunities for development to enhance the vibrancy and vitality of town centres will be welcomed.

The enhancement of cultural assets and visitor facilities will be supported, where they respect the integrity of the surrounding area, particularly those assets associated with the local historic environment.

Opportunities to support the development of rural and marine based tourism will be welcomed, where they can demonstrate that negative impacts on the environment can be avoided.

Proposals for tourism facilities will be assessed against the principles below:

- Identified need for creation, expansion or improvement of tourism facilities.
- The proposal is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment.
- Maximises opportunities for sustainable travel.

E7a Do you agree with the proposed policy approach towards tourism?

Agree

~~Disagree~~

E7b Please explain why you agree or disagree with the proposed policy approach towards tourism

There is scope for developing tourism in the rural areas, but there does need to be some assessment and management of impacts to the environment and infrastructure.

E7c Would you suggest an alternative policy approach?

n/a

Visitor Accommodation

Policy E4: Visitor accommodation

The retention and provision of visitor accommodation is encouraged in accordance with the principles set out below:

- Where it meets a proven need, particularly those sectors of the market where evidence indicates unmet demand, such as a high quality boutique hotel in Rochester, and quality rural self-catering accommodation.
- Development enhances the quality and offer of existing visitor accommodation and its setting.
- Where the proposal contributes to the vibrancy, vitality and viability of town centres and the sustainability of wider settlements.
- Where the proposal avoids negative impacts on the environment, is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment, avoids siting in areas of high flood risk and intrusion into the landscapes of open countryside.
- Maximises opportunities for sustainable travel in accessible locations and minimises traffic generation.

E8a Do you agree with the proposed policy approach towards visitor accommodation?

Agree

~~Disagree~~

E8b Please explain why you agree or disagree with the proposed policy approach for visitor accommodation

Support and policies for Bed and Breakfast, Tourist Caravan Parks, Holiday Parks (Haven), Allhallows Place, Rural Hotels etc. do need to be developed as well.

E8c Would you suggest an alternative policy approach?

n/a

Retail and Town Centres

This section provides details of Medway's retail strategy, and considers the relationship between Medway's town centres and out of centre retail locations and retail parks. There is associated policy guidance to support and strengthen our town centres, neighbourhood and village centres and considering how Medway needs to respond to the major changes that have been taking place in shopping patterns over recent years.

Q8 Thinking about the retail and town centres section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?

There are technical questions asked about the following retail and town centre policy approaches:-

- Retail Hierarchy
- Sequential Assessment
- Impact Assessments
- Role, Function and management of uses in centres – Frontage
- Temporary uses
- Supporting Sustainable and Healthy centres
- Hempstead Valley District Centre
- Dockside
- Medway Valley Leisure Park
- Healthy sustainable communities
- Local Centres and shopping parades
- Retail Parks

Retail and Town Centres

This section provides details of Medway's retail strategy, and considers the relationship between Medway's town centres and out of centre retail locations and retail parks. There is associated policy guidance to support and strengthen our town centres, neighbourhood and village centres and considering how Medway needs to respond to the major changes that have been taking place in shopping patterns over recent years.

Q8 Thinking about the retail and town centres section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?

It will be important to assess the impact of retail and town centres on each other and ensure transport infrastructure is available to satisfy those needs. Quality public realm needs to be provided and well maintained. Marketing/tourist plans should be developed and widely publicised.

There are technical questions asked about the following retail and town centre policy approaches:-

- Retail Hierarchy
- Sequential Assessment
- Impact Assessments
- Role, Function and management of uses in centres – Frontage
- Temporary uses
- Supporting Sustainable and Healthy centres
- Hempstead Valley District Centre
- Dockside
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- Healthy sustainable communities
- Local Centres and shopping parades
- Retail Parks

Retail Hierarchy

Policy RTC1: Retail hierarchy

The function of centres as multi-purpose destinations and the main locations for retail, community, leisure and employment will continue to be supported in relation to their individual role and scale. Chatham is the primary centre at the top of the hierarchy and will be the focus for the majority of comparison retail to meet the strategic needs for the authority and maintain its role in the hierarchy.

Medway's hierarchy of centres is:

I. Principal Town Centre: Chatham is the main location for comparison retail, community uses, leisure, culture and tourism (in support of local heritage assets and cultural focus).

II. District Centres: The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres: Strood, Gillingham, Rainham, Rochester, Hempstead Valley.

III. Local Centres: The authority seeks to maintain the sustainably accessed local top up shopping offer and to satisfy the day-to day needs of the local population.

New local centres or shopping parades compliant with the council's retail policies may be required in the following locations depending on the defined development strategy and proposals maps in the Local Plan, the scale of the proposal.

- Hoo St Werburgh rural town
- Rainham East
- Capstone

Proposals will need to be supported by a robust justification talking into account the existing provision, character and scale of the area and the demographics.

RTC1a Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway?

Yes

~~No~~

RTC1b Please explain why you consider / don't consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway

There does need to be more support for local top-up shopping and the provision of 'core' services that reduce the need to travel into District and Town Centres for basic items.

RTC2a Do you agree with the definition of Chatham as the primary centre at the top of the hierarchy?

Agree

Disagree

RTC2b Please explain why you agree or disagree with the definition of Chatham as the primary centre at the top of the hierarchy

This assumes the development of further employment, retail and entertainment in the area rather than out of town locations.

RTC3a Do you agree with the identified district centres?

Agree

~~Disagree~~

RTC3b Please explain why you agree or disagree with the identified district centres

n/a

RTC4 How do you consider that Dockside should be recognised in Medway's retail hierarchy?

Specialist Retail, Entertainment and Tourism

RTC5 Would you propose any alternative approaches to Medway's retail hierarchy?

No

Sequential Assessment

Policy RTC2: Sequential Assessment

Main town centre uses are directed to Medway's centres as identified in policy RTC1.

Proposals to locate or expand main town centre uses outside of defined centres, and where not in accordance with any part of the retail and main town centre uses strategy in the development plan, are required to demonstrate through a sequential assessment, within an agreed and defined catchment area, that there are no sequentially preferable sites available in accordance with the following sequence:

I. Chatham

II. Strood, Gillingham, Rainham, Rochester

III. Hempstead Valley Shopping Centre

IV. Local centre or edge of centre, whichever is better connected and able to support 1, 2 or 3 listed above

V. Out of centre

When considering sequentially preferable edge and out of centre sites, following demonstration of the unavailability of more central sites, preference will be given to edge and out of centre sites that are accessible and well connected to town centres respectively, i.e. consideration of edge of centre sites first.

The catchment area must be defined through discussions with the authority at the earliest opportunity and is dependent on the scale and type of the proposal and its ability to draw trade.

Large scale leisure proposals must be accessed by sustainable means, not have a negative impact on traffic and provide ease of access.

Proposals for ancillary development are required to be compliant with the policy set out above unless it can be:

- Justified as ancillary and necessary for the business operation;
- the type of use and scale of the proposal is secondary to the predominant/main use;
- demonstrated that there are dependencies between the proposal and the predominant/main use. Consideration will be given to the location of the proposal in relation to the predominant/main use;
- it may be necessary to manage the ancillary use through condition to maintain its secondary nature

The scale of the proposal may also require an impact assessment and therefore requires compliance with policy RTC3 where it meets the criteria.

RTC6a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Yes

No

RTC6b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

n/a

RTC6c Do you agree with the proposed sequential approach?

Agree

Disagree

RTC6d Please explain why you agree or disagree with the proposed sequential approach

n/a

RTC6e Would you propose alternative approaches?

n/a

Impact Assessments

Policy RTC3: Impact Assessments

Proposals that seek to locate or expand retail and other main town centre uses in edge or out of centre locations will be permitted where:

- a) it is supported by an impact assessment where proposals for comparison, convenience retail, or commercial leisure development exceeds a defined threshold set in the Local Plan; or other large scale leisure and office uses exceeds 2,500sqm.
- b) it is demonstrated that it would not have a significant adverse impact on:
 - Impact on the strategy - development, retail and main town centre uses strategy
 - Impact on vitality and viability of centres within the catchment of the proposal
 - Impact on existing, planned or committed town centre investment
 - Consideration is given to the cumulative impact of proposals considered relevant and to the health of centres

is given to the local context and the vulnerability of the authority's centres

- c) Where appropriate development proposals may be conditioned to reduce the impact on centres where there is an impact but is not considered significantly adverse to justify refusal.

RTC7a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

Yes

~~No~~

RTC7b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

Need to also identify highways local shopping centre impacts.

Ongoing impacts also need to be undertaken and policies developed rather than a point in time prior to development.

RTC8a Do you agree with the proposed approach to impact assessments?

Agree

~~Disagree~~

RTC8b Please explain why you agree or disagree with the proposed approach to impact assessments

n/a

RTC9a What do you consider would represent an appropriate size threshold for developments to undertake an impact assessment?

n/a

RTC9b Would you propose alternative approaches?

n/a

Role, Function and management of uses in centres – Frontage

Policy RTC4: Frontages

Proposals within frontages of centres must be in accordance with the council's design policies and:

- provide an active frontage at ground floor level, which is accessible and attractive to pedestrians. The presence of a larger proportion of show window space is required.
- be of appropriate scale, format, design and character reflective of the facades above ground floor, the centre's role and function and the Council's ambitions as set out in RTC1 and RTC5
- Protect and where possible enhance the public realm through well planned and coordinated planting, improvements to surfacing/paving and other environmental enhancements.
- Must demonstrate no harm to other neighbouring businesses, residential public and visual amenity through impacts such as noise, light, odour, late night activity, litter and general disturbance.
- Any proposals for shutters must maintain views into shops when closed, be back lit, powder coated and any housing should relate well to shop frontage and signage.

Policy RTC5: Role, Function and management of uses in centres – Frontage

The council seeks to establish a robust, vital and viable retail core in support of competitive, sustainable and healthy centres compliant with its retail policies. A mix of uses is supported with due consideration of avoiding an overprovision or concentration of the same type of uses.

Primary Frontage

Proposals for non-A1 uses within the primary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy provided the provision of A3 uses do not result in an over concentration in Rochester District Centre.

Where the proposal results in the loss of A1 premises, permission will be granted where:

- i. it is consistent with the policy above.
- ii. in all other cases the unit has remained vacant for at least 6 months and the applicant can demonstrate:
 - reasonable attempts were made without success to let the premises for A1 use;
 - that the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy of the centre.

Greater efficiency in the use of upper floors will be supported and encouraged.

Secondary Frontage

Proposals for non-A1 uses within the secondary frontages will be supported where reflective of the role, character and function of the centre and/or supportive of an evening economy and where provision of A3 uses does not result in over provision in Rochester district centre.

Where the proposal results in the proportion of A1 representation falling below the threshold defined by the council and/or results in the loss of A1, A3, D2, community and cultural uses, permission will be granted where:

- reasonable attempts were made without success to let the premises for the last use
- the proposed use will make a positive contribution toward the vitality and viability, balance of uses and/or evening economy.

RTC10a Do you agree that this proposed approach represents an effective approach to planning for the city and district centres in Medway?

Agree

~~Disagree~~

RTC10b Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for the city and district centres in Medway

n/a

RTC11a Do you consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

~~Yes~~

No

RTC11b Please explain why you consider / don't consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f in the Development Strategy Document

n/a

RTC12a Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

Agree

~~Disagree~~

RTC12b Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f in the Development Strategy Document?

Yes

RTC13 Do you consider that there are alternative approaches to manage this aspect of Medway's main centres?

n/a

Temporary uses

Policy RTC6: Temporary uses

Proposals for a temporary use of vacant units within town and local centre frontages will be supported for a period of up to 6 months where compliant with the council's design and retail policies and:

- where the unit has been vacant for at least 2 months;
- where the proposed use makes a contribution to the vitality and viability of the centre;

Erection of structures for the operation of the business must be easily removable

Temporary permissions will only be renewed for a single additional period where:

- The original temporary permission was granted for a period of less than 4 months
- Reasonable attempts were made to let the premises without success
- The current temporary use can demonstrate benefit to the centre and success of business.

RTC14a Do you agree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway?

Agree

Disagree

RTC14b Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway

Mention should also be made for similar temporary community use in local centres

RTC14c Would you propose alternative approaches?

n/a

Supporting Sustainable and Healthy Centres

RTC7: Supporting Sustainable and Healthy centres

Development proposals will help to create healthy and sustainable places, recognising the cumulative effect individual units and specific uses can have on the success of places.

The council will seek to manage the concentration and mix of specific premises to strengthen its centres and support healthier communities.

RTC15a Do you agree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area?

Agree

~~Disagree~~

RTC15b Please explain why you agree or disagree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area

n/a

RTC16a The council considers such specific uses to include 'high energy density food' outlets, which sell foods high in fat and/or sugar; betting shops; gaming centres; and premises selling alcohol, particularly for off licence sales.

Do you agree with this definition?

Agree

~~Disagree~~

RTC16b Please explain why you agree or disagree with the definition

n/a

RTC16c Do you think that the list should be amended?

No

RTC17a Do you think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above?

~~Yes~~

No

RTC17b Please explain why you think / don't think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above

Reduction in flexibility and use of otherwise vacant properties.

RTC18a Do you think that such uses should be restricted near schools and youth facilities?

~~Yes~~

No

RTC18b Please explain why you think / don't think that such uses should be restricted near schools and youth facilities

Better facilities should be developed on-site, otherwise local community provision is impacted.

RTC19a Do you think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis?

Yes

~~No~~

RTC19b Please explain why you think / don't think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis

n/a

Hempstead Valley District Centre

RTC8: Hempstead Valley District Centre

Hempstead Valley is different to the other traditional centres with high streets. The council recognises that it provides for local needs and therefore supports the modernisation and growth of this where supportive of this local function.

Further retail and leisure development, appropriate to the character and role of the centre will be supported, following a sequential or impact test, where it can be demonstrated that it does not undermine the viability of main town centres in Medway.

RTC20a Do you consider this is the appropriate approach to planning for Hempstead Valley shopping centre?

Yes

No

RTC20b Please explain why you consider / don't consider that this is an appropriate approach to planning for Hempstead Valley shopping centre

n/a

RTC21a Do you think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway?

Yes

No

RTC21b Please explain why you think / don't think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway

n/a

RTC22a Do you support a policy approach that seeks to achieve a balance of uses across all centres in Medway?

Yes

~~No~~

RTC22b Please explain why you support / don't support a policy approach that seeks to achieve a balance of uses across all centres in Medway

n/a

Dockside

RTC23a Do you support a policy approach that recognises the family leisure role of Dockside?

Yes

~~No~~

RTC23b Please explain why you support / don't support a policy approach that recognises the family leisure role of Dockside

n/a

RTC24 What do you think is the appropriate approach to further growth? Should policy only allow a small amount of new 'convenience' retail, or support a wider range of services and shops to develop its role as a local centre?

n/a

Medway Valley Leisure Park

Policy RTC9: Medway Valley Leisure Park

Medway Valley Leisure Park is a family leisure destination that attracts visitors and residents in the area.

The council's retail policy directs all leisure uses firstly to Medway's centres. Development proposals will be supported where enhancing current provision without requiring expansion beyond the designated boundary, subject to compliance with the council's retail policies:

- satisfying that no sequentially preferable sites were found;
- that the impact assessment has been satisfied where triggered

RTC25a Do you consider that this is an appropriate approach to planning for Medway Valley Leisure Park?

Yes

~~No~~

RTC25b Please explain why you consider / don't consider that this is an appropriate approach to planning for Medway Valley Leisure Park

n/a

RTC26a Do you think that there should be a specific policy to manage the development of Medway Valley Leisure Park, or if proposals should only be determined by use of wider retail policies?

There should be a specific policy

~~Proposals should be determined by use of wider retail policies~~

RTC26b Please explain your answer

The special nature of the area needs specific policies and any retail element would need to be resisted (unless a rail station alongside could be developed).

Healthy Sustainable Communities

Policy RTC10: Healthy sustainable communities

The council will support the provision of services and facilities, in accessible locations, to support the day-to-day activities of residents in a sustainable manner. Considerations of sustainability will include the offer (balance of retail, community uses and services), and accessibility - the mode of travel and distance.

The council recognises the importance of local services in villages as critical to sustainable rural communities.

RTC27a Do you agree with this proposed approach to sustainable communities?

Agree

~~Disagree~~

RTC27b Please explain why you agree or disagree with this proposed approach to sustainable communities

Local facilities, provision for outreach services and multi-use locations should be supported and encouraged to provide for those less able to travel (cost/disability) and to reduce car traffic into district and town centres.

RTC27c What alternative approaches would you suggest?

n/a

Local Centres and Shopping Parades

RTC11: Local Centres and Shopping Parades

Uses within a defined local centre or smaller shopping parades must be appropriate to the scale, character and role of the centre or parade, be compliant with the council's retail policies and include the following uses to support the core function:

- Convenience retail offer to provide top up shopping
- Community uses (such as hall, library, notice board)
- Services (such as hairdressers, cash machines)
- provide convenience for local communities (allowing various activities to be undertaken)

Proposals resulting in the loss of the core uses listed above will be permitted in local centres and shopping parades where in compliance with the council's retail policies:

- it is demonstrated that the loss is mitigated by similar uses of community value in close proximity;
- it is demonstrated that the proposed use would make a positive contribution to the vitality and viability and balance of uses in the centre and is of appropriate scale and character;
- the unit has remained vacant for at least 6 months and can be demonstrated that reasonable attempts have been made, without success, to let or sell the premises for a shop or community use.

RTC28a Do you consider that this is the appropriate approach to planning for small retail areas?

Yes

~~No~~

RTC28b Please explain why you consider / don't consider that this is the appropriate approach to planning for small retail areas

n/a

RTC28c Do you think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis?

~~Yes~~

No

RTC28d Please explain why you think / don't think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis

Local village services need to be supported and enhanced where possible and this should be an important policy rather than left to a case by case basis.

Retail Parks

Policy RTC12: Retail Parks

Retail proposals will be permitted in defined retail parks (Strood Retail Park, Horsted Park, Gillingham Retail Park) appropriate to their character where the following criteria are satisfied:

- Provision of suitable access, parking or parking arrangements;
- It is demonstrated that no locations in-centres are available where uses are typical of and more appropriate for a town centre location;
- It is demonstrated satisfaction of an impact assessment that there will be no impact on centres, with particular attention to vitality, viability, vibrancy and sustainability of the existing centres and their vulnerabilities
- No significant impact on the transport network and parking in the surrounding area
- Good public realm and linkage to the neighbouring centre is provided assisting in linked trips and increasing dwell time in the neighbouring centre.

An impact and sequential assessment for non-minor retail (above 2,500sqm) will be required to take account of the cumulative impact of recent significant proposals.

Where appropriate the council will require:

- conditions or legal agreements will be required to manage impact on centres, including a condition on the type and range of goods.
- Public realm works to facilitate better linkage with the centre.

RTC29a Do you consider that this is an effective approach to planning for retail parks?

Yes

No

RTC29b Please explain why you consider / don't consider that this is a effective approach to planning for retail parks

n/a

RTC29c Would you suggest alternative policies for planning of development in retail parks?

n/a

Natural Environment and Green Belt

This section highlights the requirement to protect Medway's natural assets, including designated wildlife habitats, parks and other green spaces. It also considers how we can improve our resilience to climate change, including flooding, and improve levels of air quality.

Q11 Thinking about the natural environment and greenbelt section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support conservation and enhancement of the environment in Medway?

The amount and quality of the designates environment assets are worthy of protection, and enhancement and should be publicised. However the non-designated environment will also contribute to and complement this. Appropriate sites should be considered for designation and support from developers and the community.

There are technical questions asked about the following natural environment and green belt policy approaches:-

- Sites of international importance for nature conservation
- Conservation and Enhancement of the Natural Environment
- Kent Downs Area of Outstanding Natural Beauty
- Landscape
- Securing strong Green Infrastructure
- Green Belt
- Flood and Water Management
- Air Quality

Sites of international importance for nature conservation

Policy NE 1: Sites of international importance for nature conservation

The estuaries and marshes of the Thames, Medway and Swale are designated Special Protection Areas (SPAs) and Ramsar sites in recognition of their international importance as wetland habitats. There is a Special Area of Conservation in the North Downs woodland near north Halling. These sites require the highest level of protection from development that could damage the features of the designated areas. No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site, alone or in combination with other plans or projects, as it would not be in accordance with the Habitat Regulations 2010 (as amended) and the aims and objectives of this emerging Local Plan.

The council will work in collaboration with local planning authorities in north Kent to contribute to the delivery of a strategic access management and monitoring scheme to address potential damage from population increases on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

Development within 6km of these areas designated as the Special Protection Areas and Ramsar sites that has the potential to generate additional visits to these coastal areas will be required to make a defined tariff contribution to a strategic package of measures agreed by the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) Project Board.

The council will consider the potential for adverse impacts on the Special Areas of Conservation arising from development, either alone or in combination with other plans and projects. If the assessment shows that there is a potential for adverse impacts, steps will be taken to restrict or mitigate development

NE1a Do you consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats?

Yes

~~No~~

NE1b Please explain why you consider / don't consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats

n/a

NE1c What alternative approaches would you recommend to secure the favourable condition of these areas?

n/a

Conservation and Enhancement of the Natural Environment

Policy NE2: Conservation and Enhancement of the Natural Environment

The council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy NE1, Medway includes Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites and a Marine Conservation Zone.

The council will promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.

NE2a Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment?

Yes

~~No~~

NE2b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing Medway's natural environment

NE2c What alternative approaches would you recommend to secure the favourable condition of these areas?

n/a

Kent Downs Area of Outstanding Natural Beauty

Policy NE3: Kent Downs Area of Outstanding Natural Beauty

Development proposals in the Kent Downs AONB and in the setting of the downs will be required to contribute to the conservation and enhancement of the natural beauty of this designated landscape.

Development must demonstrate that it has have regard to the Kent Downs Management Plan and associated policy guidance.

NE3a Do you consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB?

Yes

~~No~~

NE3b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB

n/a

NE3c What alternative approaches would you recommend to secure the components of natural beauty?

n/a

Landscape

Policy NE4: Landscape

The council attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, containing urban sprawl and separation of settlements.

An updated Medway Landscape Character Assessment and Green Infrastructure Framework will provide a basis for determining the acceptability of development proposals and areas and features that need to be protected and enhanced.

Development proposals will be required to demonstrate that they protect, strengthen and connect features of local landscapes.

NE4a Do you consider that this is an effective approach to landscape policy in Medway?

Yes

~~No~~

NE4b Please explain why you consider / don't consider that this is an effective approach to landscape policy in Medway

n/a

NE4c What alternative approaches would you recommend?

n/a

Securing strong Green Infrastructure

Policy NE5: Securing strong Green Infrastructure

The council will protect the network of green infrastructure across rural and urban Medway. The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a Special Protection Area, Ramsar site and/or Special Area of Conservation. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland.

The council will consider the need to protect the special features of Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves

Wider components of the green infrastructure network will be protected in line with the analysis and strategy set out in the emerging Green Infrastructure Framework. This will include open space assets, landscape buffers and green infrastructure zones.

New development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.

The council will expect development proposals to demonstrate that they are designed to be resilient to, and can adapt to the future impacts of climate change, in strengthening ecological networks.

The council will promote the extension of the green infrastructure network through setting criteria for the establishment and maintenance of Local Green Spaces.

Opportunities will be sought to promote and enhance the public rights of way network, including footpaths, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside.

NE5a Do you consider that this is an effective approach to securing effective and healthy green infrastructure in Medway?

Yes

~~No~~

NE5b Please explain why you consider / don't consider that this is an effective approach to securing effective and healthy green infrastructure in Medway

n/a

NE5c What alternative approaches would you recommend to secure effective and healthy green infrastructure in Medway?

n/a

Green Belt

Policy NE6: Green Belt

The council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.

The council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

NE6a Do you agree with the proposed policy for Green Belt?

Agree

~~Disagree~~

NE6b Please explain why you agree or disagree with the proposed policy for Green Belt

Supported, although there should be a review of the green belt boundary to the west of Medway, rather than the existing boundary that, mainly, follows the KCC/Gravesham/Medway boundary.

NE6c Do you consider that the exceptional circumstances exist to justify the review of the Green Belt boundary?

Yes

~~No~~

NE6d Please explain why you consider / don't consider that the exceptional circumstances exist to justify the review of the Green Belt boundary

Some areas on the Medway side of the Green Belt boundary are under pressure for development and should be considered for inclusion in the Green Belt to protect them and their impacts on the green belt.

NE6e Do you have suggestions for alternative approaches to Green Belt policy?

The boundary should follow landscape features rather than administrative boundaries.

Flood and Water Management

Policy NE7: Flood and Water Management

The Local Plan will seek to reduce flood risk, promote water efficiency measures, and protect and enhance water quality through the following mechanisms:

Flood Risk Management

- Ensuring that development has a positive or nil impact on flood risk management interests
- Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.
- Where development benefits from an existing or proposed flood infrastructure, the development should contribute towards the capital costs and/or maintenance of these defences over the lifetime of the development.

Sustainable Urban Drainage

Development should enable or replicate natural ground and surface water flows and decreased surface water runoff, via the use of Sustainable urban Drainage systems (SUDS), utilising green infrastructure where possible and as guided by relevant national (and/or local standards) and guidance.

Where SuDs are provided, arrangements must be put in place for their management and maintenance over their full lifetime.

Water Supply

Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and it does not put at risk the ability to maintain a public water supply.

Water Quality

All new development should have regard to the actions and objectives of appropriate River Basin Management Plans (in Medway, this is the Thames River Basin District) in striving to protect and improve the quality of water bodies in and adjacent to the district, as well as ecology, geomorphology, and water quantity. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary.

Adaptation to Climate Change

Development will be required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures. These include:

- Incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment.
- Minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDs in accordance with (SuDs policy above).
- Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading.

- Seeking opportunities to make space for water and develop new blue infrastructure to accommodate climate change.
- Where possible watercourses and wetland features will be adequately buffered from development commensurate with the designation and/or ecological value of those features so that they can be safeguarded and managed sustainably in perpetuity.
- Provision for buffering, mitigating and extending habitats and green corridors to ensure that wildlife populations are more resilient for a changing climate.

NE7a Do you agree with the proposed policy for flood and water management?

Agree

~~Disagree~~

NE7b Please explain why you agree or disagree with the proposed policy for flood and water management?

n/a

NE7c Do you have suggestions for alternative approaches for this policy area?

n/a

Air Quality

Policy NE 8: Air Quality

The council seeks to reduce exposure to areas of poor air quality, maintain areas of good air quality, and where possible improve air quality through restricting development or requiring acceptable and effective mitigation measures.

Proposed developments which have the potential to impact on air quality will be expected to be accompanied by air pollution impact assessments and mitigation measures, in accordance with local air quality guidance.

All proposals should take account of the Medway Council Air Quality Planning Guidance that sets out a screening checklist for major size development and proposed development within, or close to an AQMA. Depending on the scale of development, the council may require the submission of an Air Quality Assessment and/or an Emissions Mitigation Assessment.

The guidance also advocates mitigation measures for all development. Where mitigation is not integrated into a scheme, the council will require this through a planning condition(s). If on site mitigation is not possible, then the council may seek contribution to wider air quality mitigation measures through a planning obligation.

NE8a Do you agree with the proposed policy for air quality?

Agree

~~Disagree~~

NE8b Please explain why you agree or disagree with the proposed policy for air quality?

n/a

NE8c Do you have suggestions for alternative approaches for this policy area?

n/a

Built Environment

This section is concerned with the impact development has on its surroundings, especially in terms of historic character and appearance of areas. Buildings must be designed and delivered in a sustainable way; residential accommodation needs to be delivered to an appropriate density and to provide the space people need to live.

Q14 Thinking about the built environment section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support sustainable development and high quality design in Medway?

Quality of development, including well maintained public spaces, will be an important factor and it is important to discourage estates of identical housing, but variety in setting and design should be encouraged.

There are technical questions asked about the following built environment policy approaches:-

- Promoting High Quality Design
- Sustainable Design
- Housing Design
- Housing Density Approach
- Historic Environment and Managing development in the historic environment

Promoting High Quality Design

Policy BE1: Promoting High Quality Design

Development in Medway will be expected to be of high quality design that makes a positive contribution and respond appropriately to the character and appearance of its surroundings.

Proposals that incorporate high quality design and sustainability which demonstrably consider the following criteria will be permitted:

- The scale and form of development is appropriate to its surrounding context and is characteristic of Medway, or where appropriate new high quality character;
- The protection and possible enhancement of the historic environment and heritage assets;
- How the proposal relates to and/or reinforces the local distinctiveness and character through the use of high quality materials and local vernacular materials where appropriate; landscaping and building detailing;
- Working with the topography of the site and the incorporation of existing natural features;
- Responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site;
- Makes efficient use of land and ensures appropriate streetscapes;
- Good connectivity permeability that provides a clear user hierarchy for pedestrians, cycles, public transport and cars and that streets and spaces within new residential developments are not overly car dominated;
- Demonstration of provision and/or access to essential services and facilities;
- Respects the amenity of neighbouring uses through consideration of light levels, overshadowing, overlooking, loss of privacy, visual intrusion, appropriately designed car parking and ensuring minimal impact through noise, vibration, fumes or light pollution, and other relevant considerations;
- Creates a safe environment;
- Buildings that are appropriately flexible/adaptable and in appropriate circumstances transformable in the interests of sustainable life-long places;
- Provides for discreet waste and recycling bin storage and collection in accordance with the 'Medway Waste Management Requirements for New Developments' or other superseding guidance;
- High quality landscaping and areas of public realm that make use of or retaining features considered relevant/important by the Council and demonstrating linkages/contribution toward green infrastructure assets and networks;
- Achieves a transition from urban to rural where appropriate;
- Includes measures to mitigate and adapt to climate change.
- For development to demonstrate sustainability criteria, such as at least meeting a BREEAM standard of 'Very Good' for both energy efficiency and water efficiency.

The Council would expect compliance with the principles of nationally recognised standards, such as the Lifetime Homes and Building for Life (BfL12) Standards, so far as practicable, across all proposed new housing.

Proposals that fail to take the opportunity to incorporate high quality design will be resisted.

BE1a Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?

Yes

~~No~~

BE1b Please explain why you think that the proposed policy for high quality design do / don't represent the most appropriate approach for the Medway Local Plan

Essential policy (and protections need to be built into developments to lock these in)

BE1c What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

n/a

Sustainable Design

Policy BE2: Sustainable Design

All new development should aim for high standards of sustainable design and construction where feasible.

For residential development this will include meeting the higher national water efficiency standard of 110 litres/person/day. Where possible on large developments, a water efficiency standard of 90 litres/person/day will be sought.

BE2a Does the proposed policy for sustainable design represent the most appropriate approach for the Medway Local Plan?

Yes

No

BE2b Please explain why you think the proposed policy for sustainable design does / doesn't represent the most appropriate approach for the Medway Local Plan

There needs to be standards for energy use (including micro generation)

Waste disposal/recycling needs need to be provided for.

BE2c What do you consider would represent a sound alternative approach towards sustainable design in the Medway Local Plan?

n/a

Housing Design

Policy BE3: Housing Design

New housing developments should provide good living conditions for future occupants with high quality, robust, adaptable housing and functional spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities. All new accommodation must, in addition to the general design policy above:

- As a minimum meet the relevant nationally described internal space standard for each individual unit;
- As a minimum meet the Medway Housing Design Standard (MHDS) for external spaces including shared outdoor amenity space, shared access and circulation, cycle storage, refuse and recycling, management, visual privacy and private outdoor space, environmental comfort;
- Be arranged to ensure primary habitable rooms have an acceptable outlook and where possible receive direct sunlight;
- Be designed to minimise the disturbance to occupants from other land uses nearby and/or other sources of noise, vibration and pollution;
- Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms, unless there is justification for doing so on the basis of a significant design quality gain;
- Incorporate sufficient space for storage and clothes drying;
- Encourage the extensive use of trees as a positive contribution to air/environmental quality within housing developments;
- Be designed with a clear and particular attitude to place-making and distinctiveness within their context.

BE3a Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan?

Yes

~~No~~

BE3b Please explain why you think the proposed policy for housing design does / doesn't represent the most appropriate approach for the Medway Local Plan Provision for waste management and recycling needs to be added to the policy.

n/a

BE3c What do you consider would represent a sound alternative approach for housing design in the Medway Local Plan?

n/a

Housing Density Approach

Policy BE4: Housing Density Approach

The council will seek the efficient use of land and secure positive contributions to place-making through supporting developments at higher densities in appropriate locations, where it can be demonstrated that it does not create an unacceptable impact on the surrounding amenity and environment, and has the potential to boost the vibrancy and vitality of town centres.

Density should be reflective of the particularity in its surroundings and make the most effective and efficient use of land.

The council will consider varying attitudes to density on a case by case basis in developing masterplans and development briefs for regeneration sites.

Densities surrounding transport interchanges (railway stations and bus stations) will be expected to be higher to reflect the nature of these areas as transport hubs providing sustainable travel choices.

A range of house types should be considered regarding housing mix.

BE4a Does the proposed policy for housing density represent the most appropriate approach for the Medway Local Plan?

Yes (in general)

~~No~~

BE4b Please explain why you think the proposed policy for housing density does / doesn't represent the most appropriate approach for the Medway Local Plan

In general supported, although higher densities surrounding transport interchanges (railway station and bus stations) may be appropriate in the urban areas but will not to be practical in rural locations that do not have a wider range of retail and community facilities (noted that this idea was suggested by the Government)

BE4c Is there an alternative way to express optimum net residential density, e.g. habitable rooms per hectare?

n/a

BE4d What do you consider would represent a sound alternative approach for housing density in the Medway Local Plan?

n/a

Historic Environment and Managing development in the historic environment

Policy BE5: Historic Environment

To ensure the continued contribution that the historic environment has on Medway, the council will support the conservation and, where possible, the enhancement of the historic environment; including the heritage assets and their distinctiveness and characteristics. This will be achieved through:

- Restricting development that could have an unacceptable impact on a designated heritage asset and its setting;
- Ensuring that all new development contributes to local distinctiveness and character;
- Encouraging development that makes sensitive use of historic assets, particularly where they are under-used or redundant;
- Promoting the preservation of historic buildings considered to be 'at risk';
- Resisting demolition or destruction of heritage assets without substantial justification that clearly demonstrates that public benefit outweighs the harm or loss resulting from the demolition or destruction;
- Working with stakeholders on heritage initiatives, including bids for funding.

Policy BE6: Managing development in the historic environment

Development that impacts a heritage asset, or its setting, should achieve a high quality of design which will preserve or enhance the asset's historic or architectural character, appearance and setting.

Where a development impacts upon a heritage asset, or its setting, a proportionate heritage assessment must be submitted that assesses the level of impact.

The demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that all possible methods of preserving the asset have been investigated. In the circumstances where the loss of a heritage asset can be fully and robustly justified, the developer must make information about the heritage asset and its significance available to the council, along with making it possible for any materials and features to be salvaged.

Where a development involves, or has the potential to involve heritage assets with archaeological interest, applicants must submit a desk-based assessment, or where appropriate, a field evaluation.

BE5a Do the proposed policies for the historic environment represent the most appropriate approach for the Medway Local Plan?

Yes

~~No~~

BE5b Please explain why you think the proposed policies for the historic environment do / don't represent the most appropriate approach for the Medway Local Plan

n/a

BE5c What do you consider would represent a sound alternative approach towards planning for the historic environment in the Medway Local Plan?

n/a

Health and Communities

This section identifies the opportunities to enhance health and well-being as Medway grows. It focusses on healthcare facilities, supporting healthy lifestyles, and community facilities that support good quality of life.

Q17 Thinking about health and communities section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to help improve the quality of life for Medway's residents?

It is vital to provide local quality public open space and access to the countryside and riverside (both the Thames and Medwy) for walkers, cyclists and horse riders where practical. Gaps in connectivity need to be identified and joined with support of developer contributions.

Promoting Health and Wellbeing

Policy HC1: Promoting Health and Wellbeing

The council is committed to reducing health inequalities, increasing life expectancy and improving quality of life. It will support work to improve economic and social opportunities to tackle disadvantage across Medway by:

- Seeking opportunities to improve access to healthcare facilities and activities that promote physical and mental health and wellbeing.
- Requiring planning applications for major new residential developments where Environmental Impact Assessments are required, or developments identified by the council with the potential for negative health impacts, to be accompanied by a health impact assessment in line with the HUDU Rapid Health Impact Assessment Tool. The results of this assessment will be a material consideration in determining applications.
- Helping to tackle obesity, encourage physical activity and support mental wellbeing, through the provision of greenspaces, public realm and sports facilities accessible to all, creating and enhancing environments conducive to walking and cycling.
- Ensuring new development is sustainably located with access to local health facilities, and contributes to increasing capacity in line with the scale of proposed growth, and the council's policy for infrastructure contributions from developers.
- Increasing access to healthy food choices through extending opportunities for growing food such as allotments & community gardens; securing a range of local services; and a reduction in the proliferation of uses promoting unhealthy food options, including controls on A5 uses, in line with the council's Hot Food Takeaway Guidance Note.
- Promoting health and wellbeing through the design and layout of development in order to mitigate health conditions, such as dementia, and improve the accessibility of public places.
- Working alongside healthcare commissioners to plan for the future of acute care the council will seek to investigate the redevelopment of the present Medway Maritime Hospital site and if deemed necessary the relocation, or partial relocation of some services, to a new site within Medway.

HC1a Does the proposed policy for Health and Wellbeing represent the most appropriate approach to planning for health improvements in Medway?

Yes

~~No~~

HC1b Please explain why you think the proposed policy for Health and Wellbeing does / doesn't represent the most appropriate approach to planning for health improvements in Medway

n/a

HC2a Do you agree with the proposed threshold for HIAs?

Agree

~~Disagree~~

HC2b Please explain why you agree or disagree with the proposed threshold for HIAs

n/a

HC3a Do you agree with the council's proposed approach to managing Hot Food Takeaways?

Yes

~~No~~

HC3b Please explain why you agree or disagree with the council's proposed approach to managing Hot Food Takeaways

n/a

HC4 What do you consider would represent a sound alternative approach towards planning for health in the Medway Local Plan?

More publicity for what is already in place and identification of core gaps/improvements that will be supported, land uses that impact on them resisted and support through developer contributions sought for them.

Community Facilities

Policy HC2: Community Facilities

The council recognises the importance of community facilities and the need for an appropriate range of facilities as a key component of sustainable development. The council will seek to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors.

The council will support appropriate development that seeks to enhance community facilities, that does not have a negative impact on the surrounding amenity, historic and natural environment and transport networks.

The council will require provision to be made for community facilities in planning for new development. Large scale residential developments will be required to provide community facilities to meet the needs of new residents and seek opportunities to support integration with existing communities.

New community facilities should be located within or near the community they are intended to serve and should be appropriately located to limit the need to travel, being accessible to users by walking, cycling and public transport.

If the development is smaller scale and community facilities cannot be accommodated on site, a contribution will be sought to upgrade appropriate facilities off site, where it can be demonstrated that they are accessible to residents of the new development and that there is capacity for the increased population. All developments for over 10 homes will be required to contribute to upgrading community facilities in line with the council's policy on infrastructure contributions from developers.

There is a presumption against the loss of community facilities in rural and urban areas. Any proposal which would result in the loss of a community facility will not be permitted unless:

- an alternative community facility which meets similar local needs to at least the same extent is already available; and
- it can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character and vitality of the area; and
- in the case of commercial community facilities, it has been demonstrated that it is no longer economically viable and cannot be made so.

HC5a Does the proposed policy for Community Facilities represent the most appropriate approach to planning for this aspect of social needs in Medway?

Yes

~~No~~

HC5b Please explain why you think the proposed policy for Community Facilities does / doesn't represent the most appropriate approach to planning for this aspect of social needs in Medway

Community Facilities identified, protected and developer contributions towards their upkeep and development considered.

HC5c Do you agree with the proposed approach to addressing the presumption against loss of community facilities?

Agree

~~Disagree~~

HC5d Please explain why you agree or disagree with the proposed approach to addressing the presumption against loss of community facilities

n/a

HC5e What do you consider would represent a sound alternative approach towards planning for community facilities in the Medway Local Plan?

n/a

Infrastructure

Sufficient supporting infrastructure is vital for delivery of growth in Medway. This section focuses on means of securing funding for services and infrastructure from development and planning for education, communications technology, utilities and open space and sports facilities.

Q20

Thinking about the infrastructure section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to help improve Medway's infrastructure?

There appears to be a lack of a comprehensive list of infrastructure requirements or how they would be delivered. A sequential approach to delivering them before or early in the development process does need to be established. There also needs to be an identification of what cannot be delivered without a firm commitment of contingent infrastructure.

Infrastructure Planning and Delivery

Policy I1: Infrastructure Planning and Delivery

The council will seek the timely and effective delivery of infrastructure to support the local economy and meet the needs of Medway's communities. It will seek opportunities through working with government agencies, infrastructure bodies, developers and partner organisations to secure improvements to infrastructure in Medway.

It will produce and regularly review an Infrastructure Delivery Plan, identifying the range, cost and scope of infrastructure improvements required in Medway.

Development coming forward in Medway will be expected to contribute to the delivery of new and improved infrastructure, in line with the council's evidence base and policy for infrastructure contributions from developers.

Appropriate conditions will be attached planning permissions in order to make development acceptable and to support the provision of infrastructure.

The council will identify land for safeguarding for the provision of future infrastructure where required to meet specific development needs.

The council will engage with appropriate bodies on strategic infrastructure planning matters, meeting the Duty to Cooperate and where appropriate, and through Statements of Common Ground supporting plan making.

I1a Does the proposed policy for Infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway?

Yes

No

I1b Please explain why you think the proposed policy for Infrastructure planning and delivery does / doesn't represent the most appropriate approach to planning for infrastructure improvements in Medway

The Infrastructure Delivery Plan needs to be established BEFORE the level of development in the local plan can be assessed as Sustainable.

I1c What do you consider would represent a sound alternative approach towards planning for infrastructure in the Medway Local Plan?

n/a

Developer Contributions

Policy I2: Developer Contributions

To make development acceptable and enable the granting of planning permission, deficiencies in infrastructure arising from proposed development will be mitigated through developer contributions and conditions.

Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to provide or contribute towards the additional requirement to an agreed delivery programme. Where demonstrated to be necessary, the council will require that infrastructure is delivered ahead of the development being occupied.

Where developers consider that providing or contributing towards the infrastructure requirement would have serious implications for the viability of a development, the council will require an "open book" approach and, where necessary, will operate the policy flexibly.

I2a Does the proposed policy for developer contributions represent the most appropriate approach?

Yes

~~No~~

I2b Please explain why you think the proposed policy for developer contributions does / doesn't represent the most appropriate approach

Early delivery of infrastructure will be needed – before or early in the development.

I2c What do you consider would represent a sound alternative approach for developer contributions in the Medway Local Plan?

Parish councils should be involved in, and able to comment on, suggested developer contributions from the earliest to final agreement. Allowing some local input into proposals and to encourage contributions that will benefit their communities.

Education

Policy I3: Education

Early Years & School Provision

As Medway's population grows additional school places will be needed. New residential developments of significant scale will be expected to provide education facilities within their development in order to create sustainable communities. The requirements will be informed by the council's School Organisation Plan and Education Planning Team providing an assessment of the capacity and suitability of existing local schools to expand existing school provision.

All proposals for residential developments over 10 homes will be required to contribute to the funding of education services in accordance with the council's policy for infrastructure contributions from developers.

Proposals for the upgrading and expansion of existing schools and development of new schools in locations where additional provision is required will be supported subject to the criteria below. The council may use its Compulsory Purchase powers to facilitate the development of new schools where necessary.

Proposals for new education facilities should:

- have safe access by cycle and walking, public transport and car and incorporate a school travel plan;
- have safe drop-off and pick-up provision;
- provide outdoor facilities for sport and recreation; and
- avoid conflict with adjoining uses.

The Council supports consideration of opportunities for co-location of community services and shared use facilities on school sites. Educational facilities shall be encouraged to diversify to provide a wider range of services to benefit the whole community, such as sports facilities or community centres open to the public.

Further & Higher Education

The development and expansion of the Universities at Medway and Higher and Further Education Colleges will be supported within the 'learning quarter' at Chatham Maritime. Development of supporting uses where there is an identified link to the Universities and other research and development establishments will be supported where appropriate, and does not conflict with other policies in the plan.

I3a Does the proposed policy for Education represent the most appropriate approach for planning for education facilities?

Yes

No

I3b Please explain why you think the proposed policy for Education does / doesn't represent the most appropriate approach for planning for education facilities

Priority MUST be given to the local education needs first and only if not possible should it be used on alternative sites that are accessible by public transport from the location.

I3c What do you consider would represent a sound alternative approach for planning for education facilities in the Medway Local Plan?

n/a

Communications Technology

Policy I4: Communications Technology

In order for Medway to achieve its economic and social potential and maintain its status as a well-connected place to live and work, the Council will seek to develop and enhance the provision of broadband and telecommunications infrastructure coverage across Medway.

When considering proposals for the development of communications installations, regard will be given to:

- operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications apparatus;
- the potential for sharing existing masts, buildings and other structures; and
- the impact of the development on its surroundings with particular regard to the visual amenity, character or appearance of the surrounding area, and the proposed provision of landscaping.

Apparatus and associated structures sited on a building should be sited and designed in order to seek to minimise impact to the external appearance of the host building.

Development should not have an unacceptable effect on conservation areas or buildings of architectural or historic interest or areas of ecological interest or areas of landscape value or sites of archaeological importance.

Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.

Broadband

Proposals for new major employment and residential developments should include appropriate infrastructure, wired and wireless, to provide high speed internet access as part of the development.

I4a Does the proposed policy for Communications represent the most appropriate approach for the Local Plan?

Yes (in general)

~~No~~

I4b Please explain why you think that the proposed policy for Communications does / doesn't represent the most appropriate approach for the Local Plan

There is insufficient identification of needs where access to, and speed of, communication technology is still relatively poor and the need for suppliers to work together to provide improvements.

14c What do you consider would represent a sound alternative approach for planning for communications infrastructure in the Medway Local Plan?

n/a

Utilities

Policy I5: Utilities

Any new development will be supported by the requisite utilities infrastructure.

The council seeks early engagement with utilities providers in planning to meet the strategic growth needs of Medway as set out in the Local Plan, and which supports the timely and sustainable delivery of development.

Significant new development proposals will be assessed to determine the impact on the existing network (water, electricity and gas).

I5a Does the proposed policy for Utilities represent the most appropriate approach for the Local Plan?

Yes (although still local concern about practical delivery)

~~No~~

I5b Please explain why you think that the proposed policy for Utilities does / doesn't represent the most appropriate approach for the Local Plan

Residents are concerned about the practical delivery of this, often based on experience if recent developments.

I5c What do you consider would represent a sound alternative approach for planning for utilities infrastructure in the Medway Local Plan?

n/a

Open Space and Sports Facilities

Policy I6: Open Space and Sports Facilities

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Policy I7: New Open Space Provision

Provision for new open space will be in line with specifically identified needs, informed by a robust assessment. Strategic scale development will be required to provide new greenspaces to meet community needs, and contribute to the quality of placemaking

Policy I8: New Playing Pitches

New pitches will be provided in line with specifically identified needs, informed by a robust assessment.

Any new playing pitches should be constructed in line with Sport England guidance.

I6a Do the proposed policies for open spaces, sports facilities and playing pitches represent the most appropriate approach for the Local Plan?

Yes

~~No~~

I6b Please explain why you think that the proposed policies for open spaces, sports facilities and playing pitches do / don't represent the most appropriate approach for the Local Plan

Requirements will need to consider the implications of LOSS of facilities and support for local provision that requires financial support to remain viable and support future needs.

I6c What do you consider would represent a sound alternative approach for planning for open spaces, sports facilities and playing pitches in the Medway Local Plan?

n/a

Gillingham Football Club

Policy I9: Gillingham Football Club

The Council recognises the positive benefits of a successful football club to the Medway community and economy and will work positively with the club to find an appropriate site for the development of a new stadium with associated facilities that should include education, employment, sports and leisure, community use and hotel and conference facilities. Any proposals must demonstrate the sustainability of the site, include an Environmental Impact Assessment and demonstrate the benefit to Medway as a place to live, work, learn and visit.

I7a Do you agree with the proposed policy for Gillingham Football Club?

Agree

~~Disagree~~

I7b Please explain why you agree or disagree with the proposed policy for Gillingham Football Club

n/a

I7c Do you support the relocation of Gillingham Football Club to a new stadium in Medway?

Yes (where policy stated can be met)

~~No~~

I7d Please explain why you do / don't support the relocation of Gillingham Football Club to a new stadium in Medway

n/a

I7e Where do you consider would be a suitable location for a relocated stadium?

n/a

I8 What uses would you expect to see come forward as part of any new stadium proposals?

Community facilities

Transport

This section looks at planning for transport networks and facilities to ensure our transport systems are fit for the future; making links to development, supporting businesses and leisure activities.

Q23

Thinking about the transport section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to support a sustainable and effective transport network in Medway?

Road congestion is already high in many locations and movement round the Medway Towns compromised (and even more so when there is disruption on major roads). Use of public transport (including rail) across the towns should be encouraged. New developments will need to provide support for residents to plan their options and support alternatives to car use (where practical).

Parking in villages is a growing issue and car parking provision is key, as well as provision for community parking. Increased parking requirements for developments in the rural areas should be considered.

Promoting sustainable transport

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

T1a Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?

Agree Importance of air quality, noise and traffic congestion are major requirements. Use of the railway within the Medway Towns (East/West and North/South) needs further publicity and encouragement)

~~Not Agreed~~

T1b Please explain why you agree or disagree that this approach offers an appropriate strategic approach to transport planning in Medway

n/a

T1c What do you consider would represent a sound alternative approach towards sustainable transport in the Medway Local Plan?

n/a

Integrating Land Use and Transport Planning

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 (replicated below for ease of reference).

Proposals which compromise this policy will be resisted.

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

The approach is based on four walking zones centred on rail stations:

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

* Indicative for Development Strategy Scenarios 2 and 3 only

	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

T2a Do you agree/disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway?

Agree

~~Disagree~~

T2b Please explain why you agree or disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway

T3a 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?

Agree (as long as a rural densification is developed alongside an urban area)

~~Disagree~~

T3b Please explain why you agree or disagree that densification is more likely to increase the viability of additional and/or improved public transport services

n/a

T4a 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?

Yes

No

T4b Please explain why you think it is appropriate / inappropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs

Practical benefits outside major cities does not appear to be proven.

T4c Continuing to think about the optimum densities set out in Table 11.1. For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare?

Yes

No

T4d Please explain why, for peripheral areas, you think it is appropriate / inappropriate to require a minimum of 35 dwellings per hectare?

Case by case required.

T4e Would it be appropriate to include Cuxton and Halling stations in Table 11.1?

Yes

No

T4f Please explain why you think it would be appropriate / inappropriate to include Cuxton and Halling stations in Table 11.1

Rural stations do not have the range of services and facilities that support an increased density.

T5 What do you consider would represent a sound alternative approach towards the integration of land use and transport planning in Medway?

n/a

Hoo Peninsula rail connection

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.

T6a Do you support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight?

Yes (Strongly supported)

~~No~~

T6b Please explain why you support / do not support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight

Road access into town and to the major road network is already congested, without future developments. Vehicles need to be taken off the road where practical.

T6c The council welcomes responses indicating areas of land to be safeguarded. This information could be considered in a business case, subject to funding. Do you have any areas you would like to suggest:-

B2000 between Cliffe and Cliffe Woods for a future halt/station.

Land around Kingsnorth for a passenger terminal station and transport interchange for the Hoo Peninsula.

T6d What alternative approaches would you suggest?

Start with basic service (2/3 coach battery/hybrid to Medway Towns (Strood Platform 3)) and then grow with services towards London as demand grows (when/if Crossrail comes to Gravesend and other Gravesend services can be extended). Initial costs will have to be met, in the main, by developer contributions so a relatively low cost solution should be implemented as quickly as possible).

Rochester Airport

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.

T7a Do you agree with the proposed policy for aviation in Medway?

Agree

~~Disagree~~

T7b Please explain why you agree or disagree with the proposed policy for aviation in Medway

On the basis of impacts miigated.

T7c What alternative approach would you propose for planning policy for aviation in Medway?

n/a

Riverside Infrastructure

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.

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.

T8a Do you agree with the proposed policy for riverside infrastructure in Medway?

Agree

~~Disagree~~

T8b Please explain why you agree or disagree with the proposed policy for riverside infrastructure in Medway

n/a

T9a Do you consider the flexible approach to Chatham Docks to be appropriate?

Yes

~~No~~

T9b Please explain why you consider / don't consider the flexible approach to Chatham Docks to be appropriate

n/a

T10 What alternative approach would you propose for planning policy for riverside infrastructure in Medway?

n/a

Medway Riverside Path

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.

T11a Do you agree with the proposed policy for a riverside path in Medway?

Agree

Disagree

T11b Please explain why you agree or disagree with the proposed policy for a riverside path in Medway

But do not forget the River Thames!

T11c What alternative approach would you propose for planning policy in Medway?

n/a

Marinas and moorings

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.

T12a Do you agree with the proposed policy for marinas and moorings in Medway?

Agree

~~Disagree~~

T12b Please explain why you agree or disagree with the proposed policy for marinas and moorings in Medway

n/a

T12c What alternative approach would you propose?

n/a

Urban Logistics

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.

T13a Do you agree with the proposed policy for planning for logistics in Medway?

Agree

Disagree

T13b Please explain why you agree or disagree with the proposed policy for planning for logistics in Medway

It is not clear how the local road infrastructure would support this level of activity. Use of the railway, for inward and major outward delivery should be encouraged/enforced.

T13c 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. Please make any suggestions below:-

See above

T13d What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?

n/a

Connectivity and Permeability

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.

T14a Do you agree with the proposed policy for planning for connectivity in Medway?

Agree

~~Disagree~~

T14b Please explain why you agree or disagree with the proposed policy for planning for connectivity in Medway

n/a

T14c What alternative approach would you propose?

n/a

Vehicle Parking, Cycle parking and storage and Managing the transport impact of development

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

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.

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.

T15a Do you agree with the proposed policy approaches for managing the transport impacts of development and provision for parking?

Agree

Disagree

T15b Please explain why you agree or disagree with the proposed policy approaches for managing the transport impacts of development and provision for parking

Vehicle Parking – further development of this policy is required. There may be a need to exceed parking provision standards in some areas (especially rural villages where vehicle ownership is much higher than urban areas) and parking is causing problems for through traffic, especially emergency vehicles. There is also a growth in commercial vehicles operating from residential properties or ‘brought home’ to be parked up between jobs or return to work.

Support for Cycle Parking and Storage

Support policy for transport plans – but to include references to the Kent Community Rail Partnership for developments alongside the Medway Valley Line or any Hoo Peninsula Passenger Rail.

Support policy for vehicle crossovers.

The amount of development proposed (housing, economic development, public open space etc.) will mean large scale development until 2035 (and probably longer). During this there is likely to be considerable vehicle movement adding to the existing pressure on local roads and the environment (noise, dust, air quality and lighting). There will be a need for developers to conform to quality standards of development (although voluntary, should be enforced by planning condition where appropriate.

There should also be a body established by developers, the council or a private/public sector body to establish and run a local exchange for building materials (plant, equipment, materials and soils etc.) so that these items can be shared/re-allocated/re-used rather than sent to land fill or transported in and out of the area unnecessarily when needed locally – ultimate disposal if not used would remain with the generator of the material/item.

T15c 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?

Yes

~~No~~

T15d Please explain why you think it would / wouldn't be prudent to seek to manage this through planning policy

Implications and support for this may be identified early in any new development.

T15e What alternative approaches would you propose for policy in the new Medway Local Plan

n/a

Minerals, Waste and Energy

This section looks at how we need to plan for the sustainable supply of minerals, including wharves for importation of materials, how we plan for the management of waste and it also looks at planning for energy, renewables and supporting low carbon development.

Thinking about the minerals, waste and energy section of the Development Strategy, please answer the following question.

Q26 When developing the Local Plan what things do you think the council should consider to manage minerals, waste and energy within Medway whilst supporting regional and national demand?

n/a

There are technical questions asked about the following infrastructure policy approaches:-

- Minerals Supply, Land-won extraction of sands and gravels, Land-won minerals: chalk and clay, Minerals wharves and railheads and Minerals infrastructure
- Waste Management, New Waste Management Facilities, Existing Waste Management Facilities, Waste disposal to land and Waste Water Treatment Works
- Energy and Renewables and Low Carbon Development

Minerals

Policy MWE1: Minerals Supply

The council will plan for a steady and adequate supply of minerals by:

- Maintaining a 7-year landbank of permitted sand and gravel reserves;
- Supporting regional consideration and planning of minerals through its membership of the South East England Aggregates Working Party.

Policy MWE2: Land-won extraction of sands and gravels

Proposals for the extraction of sand and gravel will be permitted within the identified areas of search when:

- There is a proven need for the minerals to be extracted at that time in order for the council to maintain a 7-year landbank;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
 - o Exceptions will be considered when there are demonstrable overriding benefits that justify the development.

Policy MWE3: Land-won minerals: chalk and clay

Proposals for the extraction of land-won minerals will be permitted outside of the identified areas of search when:

- There is no adverse impact on sites designated for environmental or heritage significance;
- There is a proven need for the minerals to be extracted at that time;
- The site is not allocated for another use in the Local Plan;
- The site is located in an area that can accommodate the proposed development;
- There is a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site; and
- The proposed development is in accordance with the provisions of the Local Plan;
- Exceptions will be considered when there are demonstrable overriding benefits that justify the development.

Policy MWE4: Minerals wharves and railheads

The identified minerals importation and distribution facilities that currently benefit from permanent planning permission will be safeguarded from development that would prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;

- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the importation or distribution facility can be made elsewhere in Medway.

Policy MWE5: Minerals infrastructure

Facilities for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material in Medway will be safeguarded from development that will prejudice or prevent their operation, unless;

- The proposed site is already allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;
- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the facility can be made elsewhere in Medway.

MWE1a Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway?

Yes

~~No~~

MWE1b Please explain why you think that the proposed policies MWE1-MWE5 do / don't represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway

n/a

MWE1c What do you consider would represent a sound alternative strategy for minerals planning in the Medway Local Plan?

n/a

Waste

Policy MWE6: Waste Management

All development should seek to minimise the generation of waste, having regard to the Waste Hierarchy.

The council will promote sustainable waste management within all new developments, ensuring that there is an appropriate provision for the separation, storage and collection of waste.

In order to help reduce waste through the development process, planning applications for major or strategic development¹⁹⁴ or those where significant levels of waste will be generated must include a waste management audit. The audit will be expected to show how waste is to be managed both through the construction period, including demolition and remediation, if appropriate; and that effective means of managing waste arising from the development are provided.

The council will continue to actively support regional consideration and the planning of waste management through its membership of the South East Waste Planning Advisory Group (SEWPAG), and with neighbouring Waste Planning Authorities on cross-border waste management issues and opportunities.

Policy MWE7: New Waste Management Facilities

The council will strive to maintain net self-sufficiency across each of the waste streams through permitting facilities for the reuse, recycling, treatment and transfer of waste materials, subject to their being of an appropriate environmental standard. Medway City Estate and Kingsnorth and, at a lesser scale, the existing established industrial estates are the preferred locations for such activities. The development of waste facilities outside of identified industrial areas will only be permitted where:

- There is no adverse impact on sites designated for environmental or heritage significance;
- The site is not allocated for other uses in the Local Plan;
- The site is located in an area that can accommodate the proposed development and does not have an unacceptable impact on amenity, the local environment and transport networks; and
- The site comprises brownfield land;
 - o Proposals on green field land will only be permitted where no alternative suitable brownfield sites can be identified.

Special consideration will be given to the development of waste management within existing established industrial estates that utilise existing rail facilities or the river Medway as a means of transportation.

Policy MWE8: Existing Waste Management Facilities

Existing waste management facilities that currently benefit from permanent planning permission will be safeguarded from development for non-waste management uses, unless;

- The proposed site is allocated for other uses in the Local Plan;
- It can be demonstrated that the facility is no longer required;

- Material considerations indicates that the need for the proposed development override the presumption for safeguarding; or
- Alternative equivalent provision for the loss of the waste management facility can be made elsewhere in Medway.

Policy MWE9: Waste disposal to land

Proposals for the creation of void space or land-raising to facilitate a disposal facility for non-inert or hazardous waste located within the areas referred to as the Disposal to Land Resource Areas on the Hoo Peninsula and Isle of Grain will be assessed against the following criteria:

- Impact of development on rural landscape character and local distinctiveness;
- Other local impacts, including on residential amenity, being acceptable;
- The site being well related to the primary road network and with suitable site access and egress arrangements, and that impacts on the transport network are acceptable. Opportunities for transport by rail and water are encouraged;
- It being clearly demonstrated that the material to be deposited cannot be reasonably disposed of in any other way (that is that they are irreducible residues);
- That the facility will handle a high proportion of such waste arising within Medway and the immediately surrounding area to ensure a sustainable pattern of disposal;
- Unless a specific needs case can be demonstrated, that wastes to be deposited do not involve a road haulage distance of more than 50 miles;
- That all the reasonable requirements of the Environment Agency can be satisfied; and
- There being a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site.

Policy MWE10: Waste Water Treatment Works

Proposals for the development of new, or the extension to existing waste water treatment works, sewage treatment and disposal facilities will be permitted in sustainable locations where there is a proven need for the proposed facility, and development does not conflict with the need to safeguard the environment and does not create unacceptable impacts on amenity.

MWE2a Do the proposed policies MWE6-MWE10 represent the most sustainable approach to managing Medway's waste?

Yes

~~No~~

MWE2b Please explain why you think that proposed policies MWE6-MWE10 do / don't represent the most sustainable approach to managing Medway's waste

n/a

MWE2c What do you consider would represent a sound alternative strategy for waste management in the Medway Local Plan?

n/a

Energy

Policy MWE11: Energy and Renewables

Proposals for energy developments, including any ancillary building or infrastructure, will be supported unless:

- the impact would compromise statutory designations where national planning policy restricts development;
- their scale, form, design, material and cumulative impacts is unacceptable to the local landscape or built environment, or loss of the best and most versatile agricultural land;
- any adverse impacts on the local community, economy, biodiversity or historic interests cannot be mitigated;

The council will consider the designation of defined areas for renewable energy technologies through a Local Landscape Character Assessment.

The council will actively promote the development of local supply chains and other associated employment opportunities.

The council will explore opportunities for Combined Heat and Power Systems connected to district heating networks.

Policy MWE12: Low Carbon Development

This policy seeks to implement an energy hierarchy by achieving energy efficiency first, before requiring the implementation of other forms of renewable energy generation on a larger scale.

Developers are required to follow the hierarchical approach set out below in achieving the energy and carbon dioxide emission requirements of the Building Regulations for all new residential development. New non-residential development is encouraged to follow the same approach.

1. To improve energy efficiency through thermal and fabric performance improvement measures.
2. Provide on-site renewable energy generation or on-site connected heating, or Combined Heat and Power (CHP) technologies, or Combined Cooling, Heat and Power (CCHP) systems.
3. The remainder of the carbon reduction targets to meet the Building Regulations targets should be met through suitable additional measures.

Developers are encouraged to meet higher standards than those required nationally, and pursue additional low carbon or renewable energy generation measures where practicable.

Compliance with this policy approach is required to be demonstrated through design and access statements submitted with a planning application.

MWE3a Do the proposed policies MWE11- MWE12 represent the most sustainable approach to planning for energy in Medway?

Yes

~~No~~

MWE3b Please explain why you think that proposed policies MWE11- MWE12 do / don't represent the most sustainable approach to planning for energy in Medway

n/a

MWE3c What do you consider would represent a sound alternative strategy for energy in the Medway Local Plan?

n/a



Kent Community Rail Partnership



Medway Local Plan Development Strategy Consultation Response June 2018

This consultation response is mainly on the Transport Section (11) of the Strategy and there are some questions that may not be relevant, so there may be no response. There are some comments that have been made by KCRP members regarding other areas of the Strategy that are relevant with regard to Transport and these are shown at the end of this document.

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

Q 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?

The Strategic Transport Assessment Results will identify impacts of proposed new developments. It is our view that it is essential that modelling includes sustainable transport alternatives and provision for walking and cycling, particularly to and from railway stations.

Any developments near major roads with high vehicle speeds, must have crossing facilities for both cyclists and pedestrians. Often the Police will not allow light controlled crossings on this type of road and in these cases, an appropriate footbridge should be installed. Contributions for this must come from the developers.

Existing settlements should be assessed with regard to safer cycling routes to enable sustainable journeys. Increases in motor vehicle traffic will have an effect on air quality and this also needs to be mitigated.

Park and cycle facilities should be provided in addition to any park and ride ones. And an active travel officer should be appointed within Medway Council to encourage walking and cycling.

The Medway Local Transport Plan (LTP 2011 – 2026) states that the Council will encourage commuters to cycle to railway stations as part of their outward journey to work and will develop sub-regional cycle routes, as this development plan is designed to support the LTP, these should be priorities.

It is encouraging that Medway will ask that developers produce a travel plan. It has become clear that the Temple Waterfront development near Strood does not have one and the transport assessment for that development was carried out in 2009. Traffic numbers will have increased and may exceed those modelled at the time. Also, it would appear that very little was asked of the developers with regard to contributions for improvements at Cuxton and Strood Stations, although both are within cycling distance.

Whilst planning for the future, more electric vehicle charging points must be installed in the town centres, shopping centres, supermarkets, car parks and also at schools, colleges and universities in readiness for the increase in these vehicles in the future.

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.

Q T2

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

Yes, so long as the higher density housing that is placed outside the walking zones suggested, have an obvious and appropriate cycle route which is maintained. The introduction of an 'Arriva Click' bus service in outlying areas will be a practical move, as will more bus services locally to link to rail stations, assuming that they link with the train timetable.

Housing density values for Hoo St Werburgh are high considering this is a rural area. We understand your aspiration that this is to become a 'rural town', but the area currently has little in the way of huge developments. This would be fine as long as the housing is not in the SSSI area and that a rail link is provided.

Q 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?

Agree that densification is more likely to increase viability of additional/improved public transport services, so long as the infrastructure for active travel (walking/cycling) is in place too. Cycle racks on buses would be a huge step to enable this.

It can only be agreed if the budget is available following any S106 contributions ending, to increase/improve the public transport services. Therefore plans need to be made if eventually these services are not seen to be commercially viable.

Q 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?

It is appropriate to increase these thresholds subject to good design with other initiatives. However, care should be taken with Rochester which has huge areas close to the station of national heritage importance. It is therefore suggested that the minimum dwellings threshold should be looked at on a case by case basis. In Hoo St Werburgh peripheral area, for example, it may not be possible to require min 35 dwellings per hectare due to the SSSI nature of the area.

It is definitely appropriate to consider Cuxton & Halling in the table. We need to encourage the use of these stations, however, as rural stations, they do not have the range of services that support increased density and this should be addressed by improving these stations.

There needs to be consultation with the new rail franchisee to ensure that rail connections are timely. We will not be able to encourage rail use when connections times to other lines etc are out of sync.

Q T5

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

It is our view that the approach indicated in Policy T2, would be the ideal so no alternative is suggested.

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.

Q 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?

KCRP strongly supports the rail upgrade to the Grain freight line, however, a route via Strood might also be considered. Land around the SSSI at Hoo St Werburgh must be safeguarded.

KCRP members have suggested that the B2000 between Cliffe and Cliffe Woods be considered for a future station. Also for the land around Kingsnorth to be considered for a passenger terminal and transport interchange for the Hoo peninsula.

An alternative would be to start with basic service (2/3 coach battery/hybrid to Medway Towns (Strood Platform 3)) and then grow with services towards London as demand grows (when/if Crossrail comes to Gravesend and other Gravesend services can be extended). Initial costs will have to be met, in the main, by developer contributions so a relatively low cost solution should be implemented as quickly as possible).

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 amenities.

Q 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?

Air travel is one of the most polluting sources of travel and ought to be actively discouraged and energy, time and money should be spent on alternative forms of travel locally.

Policy T5: Riverside Infrastructure

This policy intends to reinforce Medway's strategic location in the Thames Gateway. Ports and wharfrage 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.

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.

Q T8

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

It is not clear how the local road infrastructure would support this level of activity. Use of the Railway for inward and major outward delivery should be encouraged/enforced. The idea of looking at the re-use of the disused rail line from the docks to Gillingham station is supported as is the concept of another river crossing that could be used by pedestrians and cyclists.

Any riverside paths need to have adequate railings to ensure safety of users, especially during the evenings.

Q T9

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

It is clear that increased development in the Chatham Dockyard area needs to be supported by adequate public transport and cycling and walking routes. Any future planning applications must be seen to buy in to the concept of not being car dependent for what is a fairly short distance to access the mainline rail stations of Chatham and Gillingham.

Q T10

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

None

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.

Q T11

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

Yes, but its needs to extend all the way to Halling to serve Peter's Village and it should also join up with riverside cycle path to Maidstone which currently ends at Aylesford. This needs to be discussed with Tonbridge and Malling Borough Council as a priority.

Any path installed should have some seating areas and places for people to enjoy the riverside, it should not just be a path. This will encourage people to spend time on the riverside and not just use it as a means of getting from A to B without using roads.

Runners and walkers should be encouraged to use the riverside path and it should therefore have metre markers on it, from one point to another to help this group plan their workout. Park fit equipment could also be provided along the path.

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.

Q T12

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

What alternative approach would you propose?

Yes permanent housing marinas for urban areas, but not forgetting the temporary housing marinas for rural areas.

Marinas should have access via footpaths/cycle ways in order for people to use them and enjoy the facilities.

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.

Q 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?

We are in agreement that this policy is needed. The current online purchasing trend will increase and as the housing developments are built and it is therefore inevitable that more HGVs will be therefore using the roads. We would suggest that rail freight be used as much as possible to allow goods to be delivered to the new developments in the Isle of Grain.

It should be noted that employees in any new distribution centres should be encouraged to use sustainable transport methods for their journeys to and from the workplace and therefore walking and cycling routes and use of public transport should be provided.

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.

Q 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?

Using the Manual For Streets methodology is supported, along with ensuring that there are adequate cycle routes planned to link new developments with rail and bus.

Expansion of the cycle/walking network is supported. More signage should be used to ensure that people can find their way around, both cycling and walking. Often a walking route is more direct than a road route, but if people have only ever driven that route, they would not be aware. Education with regard to walkable journeys is also required and in that respect, local walking/cycling maps should be available to residents in Medway, with distances marked clearly to encourage people to leave the car at home.

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.

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.

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.

Q 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?

We would agree with the proposed policy for managing the transport impacts of development and provision for parking. Implications and support for transport may then be identified early in any new development.

Travel plans should be compulsory and they should include references to KCRP for developments alongside the Medway Valley Line or any Hoo peninsula passenger rail lines.

'Dockless' cycles should be a compulsory consideration of the planning process. Helmet storage and a bike pump stand should always be included in cycle parking and ramps should be installed to allow cyclists to negotiate any nearby stairs

Additional Comments on other policies (policies shown as not part of the transport policies above)

Policy I1 Infrastructure Planning and Delivery

The council will seek the timely and effective delivery of infrastructure to support the local economy and meet the needs of Medway's communities. It will seek opportunities through working with government agencies, infrastructure bodies, developers and partner organisations to secure improvements to infrastructure in Medway.

It will produce and regularly review an Infrastructure Delivery Plan, identifying the range, cost and scope of infrastructure improvements required in Medway. Development coming forward in Medway will be expected to contribute to the delivery of new and improved infrastructure, in line with the council's evidence base and policy for infrastructure contributions from developers.

Appropriate conditions will be attached planning permissions in order to make development acceptable and to support the provision of infrastructure. The council will identify land for safeguarding for the provision of future infrastructure where required to meet specific development needs.

The council will engage with appropriate bodies on strategic infrastructure planning matters, meeting the Duty to Cooperate and where appropriate, and through Statements of Common Ground supporting plan making.

Q11

Does the proposed policy for infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway?

Please explain why you think the proposed policy for infrastructure planning and delivery does/doesn't represent the most appropriate approach to planning for infrastructure improvements.

No, the infrastructure delivery plan needs to be established BEFORE the level of development in the local plan can be assessed as sustainable.

Policy I9 Gillingham Football Club

The Council recognises the positive benefits of a successful football club to the Medway community and economy and will work positively with the club to find an appropriate site for the development of a new stadium with associated facilities that should include education, employment, sports and leisure, community use and hotel and conference facilities. Any proposals must demonstrate the sustainability of the site, include an Environmental Impact Assessment and demonstrate the benefit to Medway as a place to live, work, learn and visit.

Q17

***Do you agree with the proposed policy for Gillingham Football club?
Do you support the relocation of the club to a new stadium in Medway?***

Yes, where policy stated can be met. Local rail access should be added also as there will be visiting fans and other users from regional and national locations.

Questions taken from online questionnaire

When developing the Local Plan, what things do you think The Council should consider to help improve Medway's Infrastructure?

There appears to be a lack of a comprehensive list of infrastructure requirements or how they would be delivered. A sequential approach to delivering them before or early in the development process does need to be established. There also needs to be an identification of what cannot be delivered without a firm commitment of contingent infrastructure.

DRAFT



Our Ref: JW38/2018/02B536836

20 June 2018

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

By email only

Dear Sir/Madam

FUTURE MEDWAY LOCAL PLAN 2012 TO 2035 – DEVELOPMENT STRATEGY CONSULTATION

We write on behalf of our client, Turners Parks Group, who own and operate Kingsmead Park, a mobile home site for over 50s at Allhallows, and the adjoining golf course which they consider provides an opportunity to provide additional park homes for the elderly in a sustainable location.

We therefore make this representation in response to your consultation on the Development Strategy which will inform the emerging new Local Plan which sets out the council's vision for growth in the area over the period to 2035.

Development Strategy Consultation Housing Section 4

Section 4 of the Development Strategy document considers the housing needs for Medway. It states that the recent Strategic Housing and Economic Needs Assessment identified a need for 29,463 new homes to be provided in the area over the plan period, though it also goes on to note that the government has since published details of its proposed standardised method for calculating local housing need. This method indicates a need for 38,295 new homes in Medway over the plan period, or 30% more new homes than are currently being planned for. Furthermore, the Strategic Housing Market Assessment identified a high level of demand for affordable housing over the plan period, totalling 17,112 new affordable homes.

The section recognises the need to provide the right number of new homes, at affordable prices, and in the right mix of housing types and formats, to meet local people's needs over the plan period (paras 4.1 and 4.2).

Affordability of housing tends to be considered in relation to younger first-time buyers, but high house prices also present a difficulty for older people on low pension incomes who can no longer afford the mortgage and/or



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upkeep their large family homes, but who are not eligible for social or affordable rented housing. Many of these older people seek affordable low cost accommodation in residential mobile homes and in the process free up their former homes for new young families who in turn will free-up their starter homes for new entrants to the housing market. These caravan based homes are now more commonly referred to as 'park homes'.

Often, older people may have a limiting long term physical disability or illness or simply from a factor of age find it difficult to cope with a full flight of stairs. They therefore seek single storey accommodation; however, they may not be able to afford a bungalow. Instead they may choose park homes, which are similar to bungalows, but more affordable due to mass production caravan construction methods. Their single storey nature, combined with mutually supportive communities, allow them to remain living independently for a much longer period of time.

The new Local Plan, will therefore need to provide for the expansion of existing park home estates or the provision of new park home estates as part of an overall strategy to address the needs of different groups in the community such as older people including those with or anticipating limited mobility in accordance with the NPPF (para 50) and the NPPG.

Question H2: Does the proposed policy for housing mix represent a sound approach? Would you suggest an alternative approach?

Proposed Policy H2 (Housing Mix) states that the council '*seeks to ensure a sufficient range of sustainable housing options*' and goes on to specifically refer to '*suitable specialist and supported housing for elderly, disabled and vulnerable people*' as well as the accommodation needs of Gypsy, Traveller and Travelling Showpeople.

We support the provision of these categories of specialist accommodation but are of the firm view that park homes should also be included, and specifically named, within the mix of homes that best meet the needs of Medway's growing population of older people. This is because, as detailed above, park homes are almost unique in the degree to which they offer the benefits of being a housing type that is both highly affordable and highly practical for older people, and yet reduce the need for more specialist supported housing by allowing older people to stay independent for much longer than conventional housing.

Question H9: Do you agree with the proposed policy for mobile home parks? Would you propose an alternative approach?

Proposed Policy H6 (Mobile Home Parks) states that '*mobile or park home developments will be given the same consideration as other dwellings*' and goes on to say that proposals will be subject to the same compliance with planning policy in terms of assessing impact and sustainability.

Our client's site, Kingsmead Park in Allhallows, lies outside the settlement boundary but is nevertheless one of the two mobile home parks specifically named by proposed policy H6 (and indeed by adopted Policy H12) for retention due to the important role they play in providing affordable homes for older people. Accordingly it is well established that the siting of park homes is considered to be an appropriate use of the land outside defined settlement boundaries. Medway Council, other councils and Planning Inspectors have all accepted that park homes (caravans) can be compatible with a countryside setting and location outside the settlement boundary.

Furthermore, as an affordable type of housing, park home developers are not able to compete with mainstream housing developers for land that has been allocated for market housing and lies within the settlement boundary. We are not aware of any incidences in Medway, or indeed in the rest of the UK, where a park home developer has managed to acquire land allocated for housing. For these reasons, we feel that it is entirely appropriate and necessary for park home proposals to be considered differently from proposals for other types of (bricks-and-mortar) dwellings with regard to the locations that are suitable for park home development in particular. We agree, however, that

the impact and sustainability of proposals should be assessed in line with the policy requirements associated with other housing types.

Proposed Policy H6 goes on to state that the council will seek to protect existing parks from competing uses, and resist any development that may result in the permanent loss of mobile homes or reduction in the area available for their use at Hoo Marina Park or Kingsmead Park. We agree fully with these aims. The policy also indicates that the council will restrict the expansion of these existing parks outside of their designated areas. Therefore, to ensure that the parks are able to expand to cater to the growing demand for park home housing among older people, we feel that it is important for suitable sites, such as Medway SHLAA (January 2017) site ref: 1127 to be fully allocated for future park home (only) development.

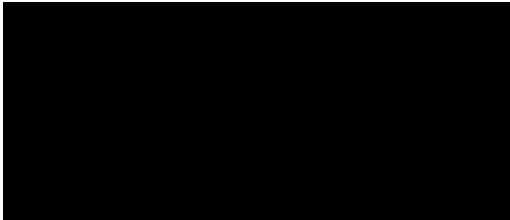
The policy suggests that the intensification of existing sites will be considered with regard to density guidelines (as set out by the latest Model Standards), along with the design of the proposed development and the impact that it has on its surroundings and on the amenity of nearby residents. We agree that this represents an appropriate approach to controlling future development on existing sites.

Finally the proposed policy indicates that the council will set out the criteria by which it will consider the development of new mobile homes/caravans outside of existing sites. For the reasons detailed above, we do not feel that the council should consider countryside sites, including those outside of settlement boundaries, to represent inappropriate locations. In terms of other criteria, sites proposed for new park home development should be well screened and positioned in sustainable locations within walking or cycling distance of appropriate services and facilities.

I would be grateful if you could acknowledge this representation, and please feel free to contact me to discuss the points raised in more detail.

I look forward to hearing from you.

Yours faithfully



James Wells
Planner



For and on behalf of GVA Grimley Limited

Representations

On behalf of Trenport
Investments Ltd

20th June 2018

Prepared by
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Medway Council Local Plan 2012-2035: Development Strategy - Regulation 18 Consultation Report March 2018

Representations on behalf of Trenport Investments Limited

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Appendix 1 : 4325/110A Preliminary masterplan – Cliffe

1.0 Introduction

- 1.1 These representations are submitted by Vincent and Gorbing on behalf of Trenport Investments Limited in response to Medway Council Local Plan 2012-2035 Development Strategy - Regulation 18 Consultation Report (March 2018) which was published for consultation on 16th March 2018. They respond to a number of issues raised in the report and a number of the specific questions which are asked.
- 1.2 Trenport Investment is a privately owned investment and land development company with an active portfolio of property and development projects throughout the country. It owns substantial areas of land in Kent, including land in Medway, which includes most of the land around Cliffe.
- 1.3 Trenport has previously made representations on earlier stages in the preparation of the emerging Medway Local Plan and the preparation of the Council's Strategic Land Availability Assessment. It has promoted development around Cliffe, including the submission of a Preliminary Masterplan. A copy of the Preliminary Masterplan accompanies these representations. For further information on Trenport's proposals for Cliffe see the Further Information Statement which was submitted in response to the SLAA consultation in February 2016, a copy of which accompanies these representations.

2.0 Responses to questions

- 2.1 This section responds to a number of the specific questions which are asked by the document.

Development strategy (Section 3.0)

Question DS1:

Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

Comments:

- 2.2 We note that the four spatial development scenario for the distribution of development differ from the four spatial development options or scenarios / approaches to meeting Medway's development needs which were set out in the previous Regulation 18 Consultation – Development Options (January 2017). In particular we note that Cliffe, which featured in all the earlier options / scenario as a potential location for development, no longer features in any of the current development scenarios. Previously Scenario 1 (Maximising the potential of urban regeneration); Scenario 2 (Suburban expansion); and Scenario 4 (Urban regeneration and a rural town) all suggested possible incremental growth at Cliffe, and other villages, of up to 900 dwellings (Scenario 2). Scenario 3 (Rural focus) proposed further development on the Hoo peninsula with a number of 'Expanded villages', including Cliffe, delivering 2,600 homes. Trenport put forward representations which supported the identification of Cliffe as location for development, with a preference for Scenario 3 (Rural focus)
- 2.3 We also note that under spatial development Scenario 3: Meeting Government's proposed calculation of Local Housing Need the amount of development proposed would be some 1,182 short of the Standard Method. There would therefore be a significant shortfall in provision using this method.
- 2.4 There are only slight differences between the four spatial development scenario, apart from the higher levels of housing in Scenario 3 and development within the Lodge Hill SSSI in Scenario 4. The spatial development strategy is generally a sustainable approach to managing Medway's growth, although we have concerns about the ability of the Lodge Hill / Chattenden to deliver the required housing, particularly Scenario 4 involving SSSI land. In order to deliver the number of houses required, in particular the number using the Government's methodology, and avoid any shortfall, the maximum number of opportunities for development should be taken, with the widest possible range and variety of sites (in terms of different types / sizes and locations), provided any impact on the environment is minimised and acceptable. Cliffe is one such location, which provides an opportunity which should be taken, and which could help make up a significant part of this shortfall, as well as helping to support existing services and facilities in the village, for the reasons outlined in previous representations and summarised below:
- 2.5 We understand from discussions with officers that the Local Plan allows for 'natural growth' at rural settlements, including Cliffe (which isn't shown as allocations in the Consultation Report document / Development Strategy Consultation: Introduction (summary)). However, this is not readily apparent from the wording of the current document. We therefore request that this be clarified in the plan and guidance provided on what scale of development might be considered to fall within the term 'natural growth', to avoid uncertainty.

- 2.6 Trenport considers that development at Cliffe should be part of any development strategy for Medway and that it can make an important contribution towards meeting Medway's development needs as well as bringing benefits for the village.
- 2.7 As has already been mentioned, the previous round of Local Plan consultations included Cliffe as a potential location for development in all four options for meeting Medway's development needs. This effectively recognised the merits of Cliffe as a possible suitable location for development.
- 2.8 Trenport is in the unique position, at Cliffe, in that it owns almost all the land around the village, which means that all the potential development areas and related land is in the ownership of a single landowner. It can therefore take a more holistic approach to development at Cliffe, such as helping to enable the expansion of the existing school (by providing land next to the), and helping to provide enhanced and expanded sports and recreation facilities, including open space and footpaths / bridleways. It can also provide for a greater range and mix of housing types, including affordable housing, self-build and bungalows etc.
- 2.9 This single ownership also means that Trenport has the ability to bring forward development at Cliffe quickly in the first half of the Plan period.
- 2.10 We have previously submitted a masterplan for development of land around Cliffe, which Trenport owns, which illustrates how up to 500 dwellings could be accommodated. This masterplan is re-submitted at this stage to demonstrate how development around Cliffe could take place.

[For further information on Trenport's proposals for Cliffe see the Further Information Statement which was submitted in response to the SHLAA consultation in February 2016 – further copy attached].

- 2.11 Trenport will assist the Council with considering the potential of land at Cliffe to accommodate development and identifying what would be an appropriate area for development. In this respect, the masterplan suggests that land to the south of Cooling Road could also be developed, should it be required. It also suggests that the existing sports ground could also be a suitable area for development, subject to satisfactory re-provision and enhancement of the facilities elsewhere with the development on other land owned by Trenport. Should the Council consider that more land is required around Cliffe for development then that land is owned by Trenport and could be made available for development (or related mitigation).
- 2.12 However, alternatively, if considered to be more appropriate, a smaller scale of growth, such as that previously promoted by Trenport, which was for 115 dwellings west of Church Street and/or 135 dwellings east of Church Street, could be accommodated (up to a maximum of 250 dwellings, if both areas were to be developed). This would provide for more limited local housing needs.
- 2.13 Finally, one thing to flag up is that over time the range and number of shops, public house and other uses at the village has reduced (as was predicted in previous representations). The village needs new development (to increase its population base) to help support and maintain the existing facilities, and there is a risk that without development there will be a further decline in services and facilities. A larger development would do more to support the existing facilities and enhance the long term sustainability of Cliffe. Trenport has deliberately not included proposals for new retail facilities or other services and facilities within its development proposals as it is conscious it did not want to compete with existing facilities in the village, which might affect their viability, leading to their closure.

Housing (Section 4.0)

Question H1:

Does the proposed policy for housing delivery represent a sound approach? Would you suggest an alternative approach?

Comments:

- 2.14 The proposed policy for housing delivery set out in Policy H1 generally represents a sound approach to housing delivery. However, we feel that it should also recognise and reflect a need for a wide range and variety of sites, including sites in villages and rural areas, to help ensure that the required numbers of houses are delivered. It should also reflect the need for housing to be located as close to where the need is, particularly in rural areas and villages (such as Cliffe).
- 2.15 The Local Plan should accommodate additional housing in rural areas with existing services and facilities (such as Cliffe) to help to support the existing community services and facilities in the village for the benefit of existing and future residents. There is a risk that if settlements are not allowed to grow they will stagnate and decline in population (due to reductions in household sizes), which, alongside increased competition from elsewhere (such as internet shopping), will lead to a continuing decline in services and facilities leading to a greater use of private cars and a reduction in the relative sustainability of the settlement, making them less sustainable location. This is evident in a number of former shops and other facilities in villages, such as Cliffe, which have changed to other uses, mainly residential. By increasing the population base existing services could be maintained and even improved, helping to make the villages more sustainable.

[For further information on Trenport's proposals for Cliffe see the Further Information Statement which was submitted in response to the SHLAA consultation in February 2016 – further copy attached].

Question H2:

Does the proposed policy for housing mix represent a sound approach? Would you suggest an alternative approach?

Comments:

- 2.16 When establishing what is an appropriate housing mix for a particular site consideration should also be given to market considerations. Housebuilders will usually seek to build a range of house types on a site to maximise the market offer and maximise the number of potential purchasers. They will only build houses which they know they will be able to sell (or a registered social landlord will build). There is no point in requiring a particular housing mix if there is no market for this type of housing as a housebuilder will not build them, which would give rise to a delay in delivering the housing.
- 2.17 The housing mix should therefore be applied flexibly and should be able to be established on a site by site basis taking account of a range of factors, including market considerations.
- 2.18 The size of Trenport's proposed development site at Cliffe, and its location and disposition relative to the existing settlement, means Trenport can look at accommodating a broad mix of house types including affordable and, potentially, an element of self-build.

Question H3:

Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision? What do you consider would represent an effective alternative approach?

Comments:

- 2.19 The size of Trenport's proposed development site at Cliffe, and its location and disposition relative to the existing settlement, means Trenport can look at accommodating a broad mix of house types including affordable and, potentially, an element of self-build.
- 2.20 Trenport note that the plan suggest a 30% level of affordable housing in rural areas and 25% in urban areas. A target of 30% for developments in rural areas seems a reasonable starting point but the policy needs to be sufficiently flexible to acknowledge that achieving the target will need to be subject to development being viable – if necessary a viability assessment may need to be prepared which takes full account of all other physical and social infrastructure requirements relative to the location of the site eg education contributions, transport (including any contribution towards a new railway station which might arise from the reopening of the Grain freight line to passenger services (as per Policy T6)).

Question H4:

What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

Comments:

- 2.21 Trenport's proposals for Cliffe will include an appropriate proportion of affordable housing split between affordable rent and intermediate housing to help meet the local affordable housing needs for Cliffe and the surrounding rural area.
- 2.22 Trenport note that the plan suggest a 60/40 affordable rent/intermediate tenure split for affordable housing. This split would seem a reasonable starting point but we query whether this split would be appropriate for all areas of Medway and whether the split should be different for rural and urban areas. The policy needs to be sufficiently flexible to acknowledge that the split may need to be varied to reflect local housing needs and conditions

Question H7:

Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme?

Comments:

- 2.23 Trenport consider that large residential schemes should include provision for an appropriate level of specialist and supported housing but that 400 is too low a threshold for rural locations which may be relatively remote from the necessary health and social services support which would be required by the residents of such accommodation. The necessary level of health and social services support is more commonly located within existing urban areas. The policy needs to be sufficiently flexible to reflect the locational characteristics and proximity to health and social services support in establishing what level of provision is appropriate or suitable for a location.

Question H15:

Do you think that the council should allocate specific sites for self/custom housebuilding development? If so, do you have any sites suitable for this use that you wish to promote for us to consider?

Comments:

- 2.24 Trenport consider that the Local Plan should not specifically allocate sites for self/custom housebuilding developments, residential allocations should be just be that and not attempt to break them down into different types of construction method, or approach to development, or housing type, which could get very complex. A better approach would be to require larger sites to provide an element of self/custom housebuilding. (See comments on Policy H17).

Question H17:

Do you agree that sites over a certain size should offer a percentage of the plots to self/custom builders?

If yes, do you agree with the proposed 5% share of plots for self/custom build and the threshold of sites at 400 dwellings and over?

Comments:

- 2.25 Trenport considers that a 5% proportion of plots for self/custom build on sites over 400 dwellings is a reasonable target, although as with other policies the policy should be sufficiently flexible to be able to reflect locational and site characteristics.
- 2.26 The size of Trenport's proposed development site at Cliffe, and its location and disposition relative to the existing settlement, means Trenport can look at accommodating an element of self-build / custom-build.

Transport (Section 11.0)**Question T6:**

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

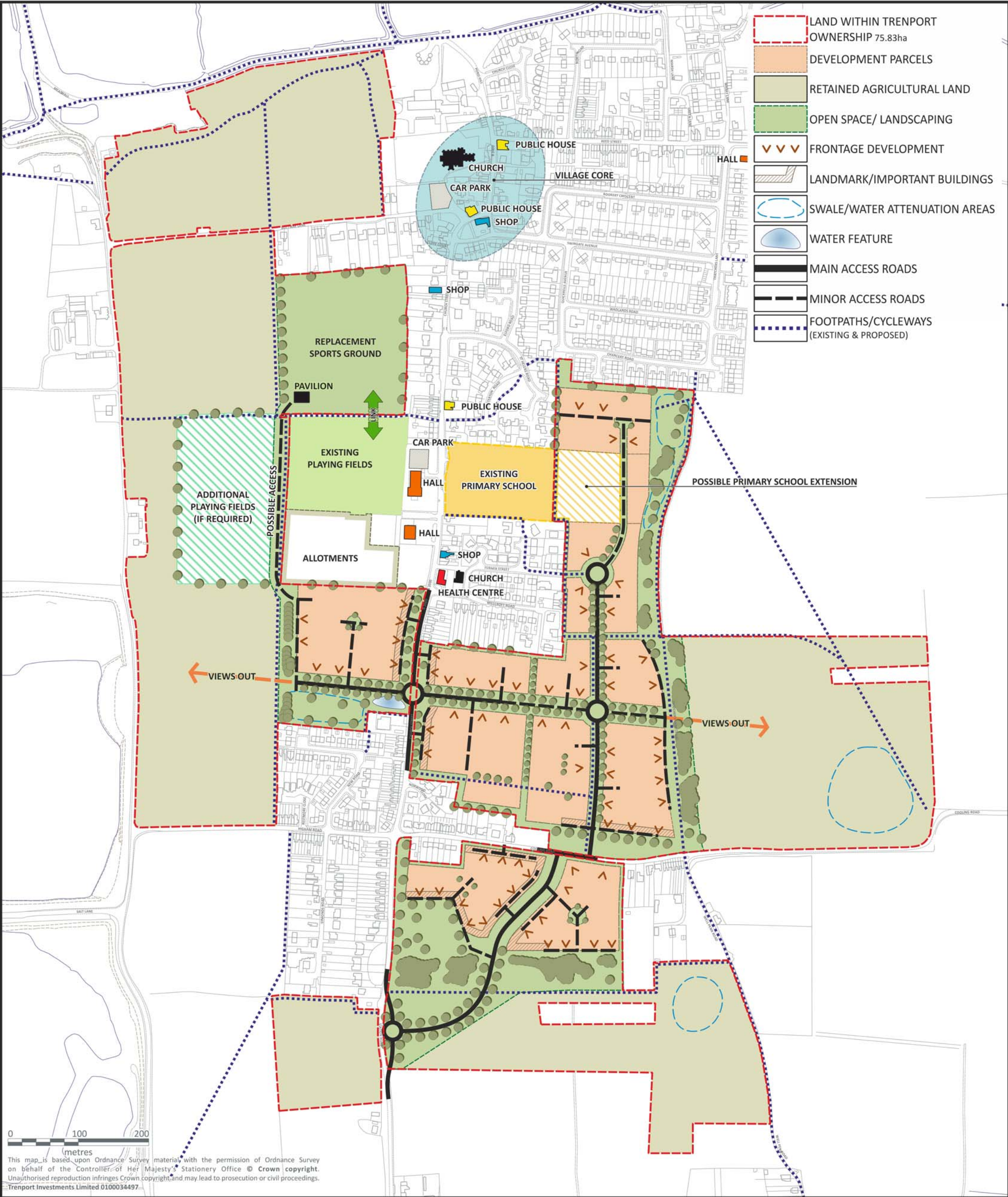
The council welcomes responses indicating areas of land to be safeguarded. This information could be considered in a business case, subject to funding.

What alternative approaches would you suggest?

Comments:

- 2.27 Trenport supports the principle of upgrading the Grain freight line to enable passenger services. As part of this proposal a station should re-opened at Cliffe, which would be well placed to serve Cliffe, Cliffe Woods and the western areas of the Hoo Peninsula. Opening a station here, as well as further to the east, would be likely to enhance the viability of the line.

Appendix 1 : 4325/110A Preliminary masterplan – Cliffe



REVISION A:
Amendments to masterplan following consultants comments
HNA/23-02-2016

PROJECT TITLE
Medway Local Plan

DRAWING TITLE
Preliminary masterplan

SCALE	DATE	CHECKED
1:5000	FEBRUARY 2016	
	DRAWN	DATE
	HNA	
PROJECT No.		
4325		
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Medway Strategic Land Availability Assessment

Further Information Statement

on behalf of Trenport Investments Limited

February 2016

prepared by Vincent and Gorbing



architecture
town planning
interior design
urban design



VINCENT AND GORBING
CHARTERED ARCHITECTS AND TOWN PLANNERS

**MEDWAY STRATEGIC LAND AVAILABILITY ASSESSMENT:
FURTHER INFORMATION 2016**

STATEMENT ON BEHALF OF TRENPORT INVESTMENTS LIMITED

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DRAWINGS

4325/100D Cliffe - Site location plan

4325/110A Cliffe - Preliminary masterplan

1.0 INTRODUCTION

- 1.1 This statement has been prepared on behalf of Trenport Investments Limited in response to the notification from Medway Council advising that it published the Medway Strategic Land Availability Assessment report in November 2015 and welcoming further input from landowners or developers to assist in updating the SLAA, particularly where detail can be provided about the deliverability of sites and the resolution of identified constraints.
- 1.2 Trenport Investment is a privately owned investment and land development company with an active portfolio of property and development projects throughout the country. It owns substantial areas of land in Kent, including land in Medway, which includes most of the land around Cliffe.
- 1.3 This statement provides the background context to Trenport's proposals for Cliffe, describes proposals for Cliffe and assesses the proposals, including the issues which Medway Council has used to assess the relative merits of sites as part of the Strategic Land Availability assessment. It is accompanied by a series of technical reports and studies which have been commissioned by Trenport which address issues which may affect the extent of development and the deliverability of proposals at Cliffe, as follows:
- Ecological Appraisal (prepared by Bioscan)
 - Interim Landscape and Visual Impact assessment (prepared by David Jarvis Associates)
 - Archaeological Desk Based Assessment (prepared by CgMs)
 - Heritage Assessment (prepared by CgMs)
 - Transport Appraisal (prepared by iTransport)
 - Preliminary Geo-Environmental Risk Assessment (prepared by Watermans)
 - Preliminary Flood Risk and Drainage Report (prepared by Watermans)
 - Existing Utilities Report (prepared by Watermans)
- 1.4 They have also informed the preparation of a Preliminary Masterplan, which is attached at the rear of this statement.

2.0 BACKGROUND CONTEXT

- 2.1 Trenport owns extensive areas of land lying to the south, east and west of the village of Cliffe, which was acquired from the former Blue Circle Cement in January 2001. (See drawing 4325/100D)
- 2.2 Representations were previously submitted on behalf of the previous landowners, as part of the preparation of the Medway Local Plan, seeking the extension of the village boundary of Cliffe to allow for the development of about 300 dwellings. Although the Inspector did not support the proposal he commented that further development, as part of a planned village expansion, might help to sustain village services and could increase public transport in the longer run. He said that the possibility of allocating land around Cliffe could be considered in the next review.
- 2.3 We are aware that in the past Medway Council's own officers have suggested the possibility of further residential development at Cliffe.
- 2.4 Since Trenport Investments acquired the land it has submitted representations at previous stages in the preparation of the Medway Local Development Framework / Local Plan, seeking the inclusion of the option of further residential development at Cliffe as part of a mixed use development, to be explored as part of the preparation of the development plan. Trenport has offered to assist with exploring the option of further development at Cliffe, possibly as part of a whole settlement strategy. Representations submitted in respect of the former LDF suggested that further development, beyond the original 300 dwellings suggested by Blue Circle, may be more appropriate and may be better able to help sustain the existing village as well as helping to retain and enhance the range of services in the village.
- 2.5 Trenport Investments previously put forward two areas of land for development at Cliffe and for consideration as part of the earlier Strategic Land Availability Assessments (and LDF / Local Plan). Separate proformas and plans were completed for each area of land. The two areas of land were part of comprehensive proposals for Trenport's land at Cliffe, which were illustrated on the previously submitted Preliminary Concept Plan (drawing 4325/102C).
- 2.6 Following discussions with officers in December 2014 and the completion of a number of technical investigations Trenport wishes to put forward proposals for a larger scale of development than previously suggested. This is illustrated on the Preliminary Masterplan (see drawing 4325/110A) and described later in this statement.

3.0 PROPOSALS FOR CLIFFE

Whole settlement strategy

- 3.1 As part of Trenport’s proposals for further development at Cliffe a “whole settlement” strategy could be devised to provide a framework identifying the most appropriate locations for development; the range of uses that should be accommodated including residential use, recreational facilities, shopping and community uses, as well as possible mixed use and employment opportunities, opportunities for environmental and visual enhancement of the village; identifying public transport improvements; and identifying a possible phasing or sequencing of development, and, if desirable, areas for potential longer term development.
- 3.2 Such a package of proposals would help to maintain and enhance existing services and facilities in the village, and thereby increase the sustainability of the settlement for existing and future residents. The package would also help to enhancing the appearance of the village. Trenport would be willing to help prepare such a strategy and to assist with implementing proposals arising from this strategy.

Preliminary Masterplan for Cliffe

- 3.3 Since 2014 a range of technical investigations and studies has been undertaken, to identify possible constraints on development and explore the potential for accommodating more development at Cliffe than previously proposed. These investigations and studies were listed in paragraph 1.3 of the introduction and cover the following matters:
- Transportation, highways and access
 - Ecology
 - Landscape and visual impact
 - Flood risk and drainage
 - Archaeology and heritage
 - Utilities
 - Geo-environmental
- 3.4 For your assistance copies of these technical reports accompany this statement and the main conclusions are set out later in this statement. These investigations and studies have informed the development proposals contained in this statement and which are illustrated on the accompanying Preliminary Masterplan (drawing 4325/110A).

- 3.5 The Masterplan is put forward for Trenport's land at Cliffe. It proposes, amongst other proposals, residential development / open space on land to the south, east and west of Cliffe and identifies the extent of land owned by Trenport Investments, and the land being promoted for residential development, included related open space and landscaping.
- 3.6 It provides an overall urban design framework for development and identifies a number of development parcels of varying sizes and shapes and the general arrangements for providing vehicular access to the site and to the parcels, including the main points of access, and the main access roads and minor access roads within the development. It also shows a network of existing and proposed footpaths and cycleways – which have incorporated in the layout and run through the open spaces to provide a circular route (or routes) around most of the village.
- 3.7 It includes a number of design features including a main central east - west axis with an avenue of trees and views out to the open countryside to the east and west; locations where there should preferably be frontage development; locations where landmark / important buildings would be located; a water feature (village pond) adjacent to the site entrances on Church Street; and wide green swathes, incorporating existing trees, alongside Church Street.
- 3.8 The Masterplan also identifies land to be used for playing fields, open space and landscape enhancement, including:
- Replacement sports ground, to the north west
 - Possible additional playing fields to the west (if required)
 - Landscaped buffers / linear open spaces / parks adjacent to the western, eastern and southern boundaries and adjacent to Cooling Road.
 - Larger area of informal open space / park and landscaping to the south at the main entrance
- 3.9 The replacement sports ground and additional playing fields are located next to the existing playing fields to build on those facilities to create a larger recreational area and also allow for the possibility of sharing facilities (eg changing rooms, pavilions, car parking etc), although the layout allows for separate access to be provided to these facilities should they be run separately. The replacement sports ground would replace the existing sports ground which is to the east of Church Street, and would provide an enlarged and improved sports facilities, including a new pavilion, which represent an opportunity to improve and expand the sports facilities for the benefit of the community. The additional playing fields would provide

additional playing fields over and above the replacement sports ground to cater for additional needs arising from the development.

- 3.10 The plan includes a number of swales and water attenuation areas (both within the development and nearby) to provide a SuDs drainage strategy. These will be designed to look natural and will be landscaped available for use as open space when dry
- 3.11 The plan also identifies other land owned by Trenport which will remain in agricultural use, although it would be available for further landscape mitigation and enhancement and for surface water attenuation.
- 3.12 The preliminary masterplan identifies a total development area (including open space and playing fields, landscaping, water attenuation, access and school expansion) of 35.15ha and approximately 13.6ha of residential development land (net). Assuming a density of 30dpha to 40dpha and assuming an entirely residential development this area would be sufficient to accommodate 410 to 540 dwellings. Subject to further refinement of the master plan and detailed design it is anticipated that the development would accommodate at least 500 dwellings.
- 3.13 The plan puts forward proposals for a predominantly residential development but is happy to incorporate mixed uses, or employment, or retail and community uses, if felt appropriate, but Trenport is conscious of the need not to compete with the existing facilities in the village, and so this would need to be the subject of discussions and consultations with Medway Council, the parish council and the local community.
- 3.14 As part of the detailed design of proposals the development would be designed to enhance the character of the village, with development possibly being built in a Kentish vernacular style to enhance its regional identity, and have a satisfactory relationship to adjoining properties, and integrate into the existing community.

Environmental constraints

- 3.15 The proposed development areas shown on the drawings can be developed with little impact on the environment or any areas of particular environmental sensitivity. For further information see the next section.

Benefits of development

- 3.16 There are a number important benefits that would arise from either of the suggested developments proposed by Trenport:
- 3.17 **Housing need** - there is a need for housing in the rural areas, as well as the urban areas, to meet locally generated housing needs and avoid the need

for families to move away from their home communities when seeking new housing. The proposals will help to meet this locally generated need. The proposals will also help to make up for any loss of housing which was to be provided at Lodge Hill (see later for discussion on this issue).

- 3.18 **Provision of affordable housing** – there is a need to provide further affordable housing and this provision is strongly supported by central Government. The proposed residential development at Cliffe will include provision of affordable housing, which will help to meet the need for affordable housing, particular for needs arising from Cliffe and its rural hinterland.
- 3.19 **Sustainability of Cliffe** – the provision of additional housing at Cliffe will help to support the existing community services and facilities in the village for the benefit of existing and future residents. There is a risk that if the settlement is not allowed to grow it will stagnate and decline in population, which, alongside increased competition from elsewhere, will lead to a decline in services and facilities leading to a greater use of private cars and a reduction in the relative sustainability of the settlement, making it a less sustainable location. This is evident in a number of former shops and other facilities in the village which have changed to other uses, mainly residential, in recent years. By increasing the population base existing services could be maintained and new services provided, helping to make the village more sustainable.
- 3.20 **Character of village** – the proposals would help to link the existing detached built up area to the south of the site with the main portion of the village to the north and in so doing help to consolidate the village and give it a more cohesive form, which will improve its appearance.
- 3.21 As part of its commitment to improving the surrounding area Trenport sold the Cliffe Pools area, a short distance to the west of Cliffe, to the RSPB, who have cleared the area after many years of neglect, and have developed Cliffe Pools as a nature reserve which is accessible to the public and has a car park and a number of viewing points. The RSPB advise that they are working to create a flagship nature reserve and the focus for visitors to the RSPB's North Kent Marshes reserves. As part of the proposals Trenport will discuss with the RSBP whether there are opportunity to enhance the facilities and features at the reserve.
- 3.22 Development could be designed to have a Kentish vernacular style, which would help to reinforce the regional identity of the village, which has been watered down by suburban style developments. As part of Trenport's proposals at Cliffe funding could be provided for enhancing the appearance of the village, in particular the conservation area and area at the centre of the village around the Six Bells PH. This, the proposed housing, and the

RSPB's nearby proposals for a flagship nature reserve at Cliffe Pools could provide a major boost for the village in terms of its appearance, the quality of environment and the range of services and facilities, as well as its status and perception.

4.0 ASSESSMENT OF PROPOSALS

Medway Site Assessment Proforma

- 4.1 This section reviews the revised proposals for Trenport's land at Cliffe in the light of the issues set out in the Council's 2015 Site Assessment Proforma for the following sites, which were based on earlier submissions to Medway Council:

- Site 0836 Land to the East of Church Street, Cliffe
- Site 0837 Land to the West of Church Street, Cliffe

- 4.2 It provides additional information and responds to a number of the issues which have been identified and identifies where technical investigations have been undertaken, copies of which are submitted alongside this statement. It incorporates the main findings and conclusions of the technical investigations.

SITE

Size

- 4.3 The total area of land owned by Trenport at Cliffe amounts to approximately 75.83ha with the suggested development area as a whole having an area of approximately 35.15ha (including related open space, playing fields, landscaping, water attenuation etc). The Preliminary Masterplan identifies a number of development parcels with a total area of approximately 13.60ha (net).

DEVELOPMENT POTENTIAL

Residential (units)

- 4.4 Subject to detailed design and discussions over the precise extent of development the development as whole has potential capacity for over 500 dwellings. (See earlier for further discussion on capacity)

Employment

- 4.5 It is not proposed to develop the land for employment use although, if desirable, it could include some employment as part of a mixed use development eg small workshops, live work units etc.

Other uses

- 4.6 As set out earlier in this statement the proposals are for a predominantly residential development but Trenport is happy to incorporate other uses,

such as retail and community uses, if felt appropriate, but Trenport is conscious not to compete with the existing facilities in the village, and so this would need to be the subject of discussions and consultations with Medway Council, the parish council and the local community.

SUITABILITY – GENERAL

Transport and accessibility (general comment)

4.7 A Transport Appraisal has been prepared by iTransport, which accompanies this statement, and has informed the preparation of the preliminary masterplan. It also considers the transport related issues in the SLAA. The following paragraphs include summaries of the main findings.

4.8 The overall conclusion of the Transport Appraisal is that:

- *The village of Cliffe is situated in an accessible location that is suitable for residential development. The development opportunity would be well connected to local services and facilities with appropriate infrastructure in place to encourage trips via sustainable modes;*
- *The development areas could be safely and suitably accessed via appropriate feasible site access arrangements that comply with the relevant design guidance; and*
- *The traffic impact of the development areas on the operation of the local highway network could be suitably mitigated through the appropriate access strategy. The traffic impact on the wider network is likely to be within acceptable limits.*

Medway Councils' SLAA assessment of development opportunity of Land at Cliffe is incorrect and misleading. It is based on arbitrary criteria with no justification and it is not consistent with NPPF. There is no reasonable justification for accessibility to be classified as an 'unresolvable constraint'.

Facilities and Services Accessibility

4.9 We note that this issue (and public transport) are identified as red in the RAG categorisation – 'site has poor access to public transport opportunities'.

4.10 iTransport has considered this issue and advises that the development site(s) at Cliffe has good access to a variety of day to day services and facilities based upon the criteria listed in Medway Councils draft SLAA document. It is worth noting that all of the services and facilities within Cliffe are within walking distance of these.

- 4.11 The arbitrary threshold distances to each service or facilities does not allow for the full potential of cycling trips. Nor does the assessment take into account the ability for internet services to replace the need to travel (i.e. online banking and supermarket delivery services etc.)
- 4.12 Based on the National Travel Survey journey purposes analysis, the development site(s) provides future residents with the opportunity to undertake up to 81% of their average daily trips to the local services and facilities available within Cliffe.
- 4.13 The development site(s) at Cliffe combines to provide a quantum over 500 units which would provide the opportunity to deliver enhancements, as well as sustain existing services and facilities within Cliffe; and
- 4.14 The overall conclusion is that accessibility of the development is comparable to proposed allocations and that neither accessibility nor public transport accessibility represent an unresolvable constraint.

Public Transport Accessibility

- 4.15 iTransport has considered this issue and to advise that the public transport accessibility is based upon arbitrary frequencies with no justification. The assessment does not distinguish between the differing levels of bus service provision appropriate in urban and rural areas, set out in Paragraph 29 of the NPPF.
- 4.16 Little consideration appears to have been given to fact that a high proportion of the site(s) are within 400m of an existing bus route and bus stops.
- 4.17 The existing bus service operates on a commercially viable basis.
- 4.18 The development site(s) at Cliffe combines to provide a quantum over 500 units which would provide the opportunity to deliver enhancements to the level of bus provision within Cliffe as noted for other larger allocations; and
- 4.19 The public transport accessibility is comparable to proposed allocations. It does not represent an unresolvable constraint.

Highway Network Capacity

- 4.20 iTransport has considered this issue and to advise that access to the Strategic Highway Network is not via the Four Elms Roundabout, as suggested. Therefore there would be little if any traffic arising from Cliffe routing through the roundabout. (It appears that this section may have been copied and pasted from the Lodge Hill Proforma). The Transport Assessment further advises that the traffic impact of the development on

the wider highway network would be considered in detail as part of any future planning application. This will demonstrate how the traffic generated could be accommodated on the highway network. It also notes that as the distance from Cliffe increases traffic disperses over the wider network and as a result the impact reduces.

Site Access

- 4.21 The Preliminary Masterplan illustrates how the site can be accessed in a satisfactory way. The accompanying Transport Appraisal includes more detailed drawings showing how the site can be accessed and confirms that a safe and suitable access is achievable.

Ecological Potential and Designated Habitats

- 4.22 In July 2015, Bioscan (UK) Limited undertook an ecological appraisal of Trenport's land at Cliffe, including an assessment of the potential of the study area to support any protected species. A copy of the Ecological Appraisal (November 2015) accompanies this statement.

- 4.23 In response to the identified issues Bioscan advise that:

the masterplan has been designed with particular regard to the proximity of the European Site (SPA/Ramsar Site/SSSI) designations encompassing Buckland and Omya Lake to the west/south-west and Cliffe Pools RSPB reserve to the north-west, and which extend from here towards the Thames. Generous provision of on-site green infrastructure, including circular rights of way options of a type and attractiveness likely to absorb a large proportion of any additional recreational pressure generated by the new dwellings, including dog-walking in particular, have been designed in at an early stage, along with buffers to ensure the proximity of built development to the designated area is no more than existing. The site promoters envisage early engagement with relevant stakeholders, including Natural England and the RSPB in particular, to tailor and finalise a multi-pronged approach to avoiding, absorbing, mitigating and/or offsetting any anticipated residual effects of concern.

- 4.24 For further details see the Ecological Appraisal.

- 4.25 The Appraisal has informed the preparation of the preliminary masterplan.

Landscape

- 4.26 We note that this issue is identified as amber in the RAG categorisation – 'further assessment of the potential impacts of development upon the local landscape would need to be undertaken through the Local Plan or

Development Management process, before development could be supported or rejected’.

- 4.27 David Jarvis Associates Limited (DJA) have undertaken an initial assessment of the predicted landscape and visual effects arising from residential development (including access and landscaping) in and around the settlement of Cliffe, and includes an assessment of the relative visual effects of development on different parts of the site. A copy of the Initial Landscape and Visual Impact Assessment (February 2016) accompanies this statement.

- 4.28 The assessment advises that:

Overall it is considered that the proposed development would result in limited landscape effects. There would be moderate adverse direct effects on local landscape character, rights of way, listed buildings and tranquillity.

- 4.29 For further details see the Initial Landscape and Visual Impact Assessment.

- 4.30 The Assessment, which includes a number of suggested landscape mitigation proposals, has informed the preparation of the preliminary masterplan.

Heritage

- 4.31 We note that this issue is identified as green in the RAG categorisation – ‘development is unlikely to have an impact upon any designated heritage assets’.

- 4.32 CgMs Consulting have prepared an Archaeological Desk-Based Assessment (September 2016, updated February 2016) and a Heritage Statement (November 2015, updated February 2016) which provide preliminary advice on the potential implications of development on archaeology and other potential heritage assets at Cliffe.

- 4.33 The Archaeological Desk-Based Assessment’s Executive Summary states:

The Three parcels of land (Plots A, B and C) at Cliffe, Kent are being promoted for residential development and have been assessed for their archaeological potential. Two proposed water attenuation areas have also been included within this assessment.

There are no Scheduled Monuments or other designated heritage assets on the site. Metal detecting across the site has identified a number of isolated finds dating from the prehistoric through to the post-medieval periods. In addition, a circular anomaly has been observed on aerial photographs in plot B, identified as a possible quarry pit, a former quarry pit lies in the south-

west of Plot C and World War II concrete vehicle obstacles lie in the north-western corner of plot C.

It is recommended that the World War II concrete obstacles are retained in any future development proposals.

In view of the finds recorded on the site, it can be anticipated that the Planning Authority's archaeological advisor is likely to seek further archaeological information to inform any future planning application. Currently, however, the available evidence suggests that any archaeological assets on the site will be in a plough-damaged condition and as such will be of local archaeological interest and consequently will not present an overriding constraint to development proposals.

[Note: Plot A is land to the west of Cliffe; Plot B is land to the east of Cliffe; and Plot C is land to the south of Cliffe].

4.34 The Heritage Statement makes the following conclusion:

This Heritage Statement has been prepared by CGMS on behalf of Trenport Investments Ltd. in order to provide preliminary advice in respect of securing a Local Plan allocation for development at Land at Cliffe, Kent (The Site).

The Site has been assessed in relation to both designated and non-designated heritage assets. The report has demonstrated that the Site is not within the Cliffe Conservation Area and neither is it in close proximity to the CCA; additionally, there is no intervisibility between the Site and the CCA, apart from some views of the top of the tower of the Church of St. Helen. There are views of three Grade II listed buildings from Plot 1, as well as views of one non-designated heritage asset.

In respect of Plan 1, the impact of the proposal would be neutral, causing no harm to any of the heritage assets.

With regard to Plan 2, the rural setting of Manor Farm will be subject to change, due to the transition from rural to village extension; enhanced vegetation and tree screening would thus be recommended to the western boundary line of the north field in Plot A. Change to the setting of Allens Hill Farmhouse is considered to be limited, due to restricted intervisibility between the Site and the farmhouse; additionally, any change will be reduced further by the recommended enhanced vegetation and tree screening to the western boundary line of the north field. The setting of West Street Farmstead is considered to be unaffected, due to the landscape screening proposed to the western boundary of the South field of Plot. The impact of the proposal would be neutral in respect of the Church of St. Helen.

The proposal meets the requirements of paragraph 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as the NPPF. It also accords with the Medway Local Plan (2003) Policy BNE18: Setting of Listed Buildings, however, this policy is inconsistent with the NPPF as it fails to allow for the weighing of public benefit against harm, therefore, less weight will be applied to it in respect of planning applications.

In conclusion, it is considered that there would be a neutral impact on the heritage assets with the implementation of Plan 1. In respect of the implementation of Plan 2, there will be some impact upon the wider setting of Manor Farm and limited impact to the setting of Allens Hill Farmhouse. However, if the recommended mitigation is implemented, this impact is considered to be neutral. We would be happy to discuss these proposals further with Medway Council.

[Note: Plan 1 relates to a smaller development as suggested in previous SLAA representations and Plan 2 relates to a larger development as suggested in these representations.]

- 4.35 For further details see these assessments which accompany this statement.
- 4.36 The assessments have informed the preparation of the Preliminary Masterplan.

Air Quality

- 4.37 We note that this issue is identified as amber in the RAG categorisation – ‘site may be constrained by air pollution but mitigation likely to be deliverable’.
- 4.38 We are surprised that the site may be constrained by air pollution, bearing in mind the location away from any major roads or significant industrial activities, and that the former Tilbury Power Station (approximately 6km to the west to the west) is closed and no longer operational, although we note that this comment has been made for virtually all other sites identified in the SLAA, so this is not an issue which is unique to Cliffe. We also concur with Medway Council that if it were to prove to be a constraint mitigation would be likely to be deliverable. However, Trenport will commission an Air Quality Assessment (either as part of the SLAA / Local Plan process or the Development Management process) if Medway considers that one is necessary.

Contamination

- 4.39 We note that this issue is identified as green in the RAG categorisation – ‘contamination is not suspected on this site’.

- 4.40 Waterman Infrastructure & Environment Limited have undertaken a Preliminary Environmental Risk Assessment for ground contamination at Cliffe (August 2015), including geology and geotechnical and controlled waters. The overall conclusion of which is that ‘given the proposed end use for the site the overall risk rating is assessed as low’.
- 4.41 For further details see the Preliminary Geo-Environmental Risk Assessment which accompanies this statement.
- 4.42 The Assessment has informed the preparation of the preliminary masterplan.

Site Developability

- 4.43 We note that this issue is identified as green in the RAG categorisation –‘the site is free from known development ‘abnormals’.
- 4.44 Site investigations have not identified any significant or abnormal constraints or features which would affect the proposed development and Trenport is confident that the site is developable and deliverable.

Agricultural Land

- 4.45 We note that this issue is identified as red in the RAG categorisation –‘the site is situated on the best and most versatile agricultural land.
- 4.46 It is accepted that the site is likely to comprise best and most versatile agricultural land but this needs to be balanced and weighed against other planning and environmental designations and considerations when considering the relative merits of different sites which might be required to meet Medway Council’s development needs.

Open Space

- 4.47 We note that this issue is identified as amber in the RAG categorisation – ‘part of the site is designated open space as amenity greenspace and outdoor sports facilities’, and that the site is larger than the area of open space and could potentially be accommodated in the development area.
- 4.48 It is confirmed that as part of the proposals, as illustrated on the Preliminary Masterplan, the existing sports ground would be relocated as part of the development, to provide a larger and much improved facility. In addition to this it is proposed to provide further playing fields (if required) and open space and parks, which would significantly increase the amount of open space at Cliffe.

SUITABILITY – HOUSING

Flood Risk

4.49 We note that this issue is identified as green in the RAG categorisation – ‘site is at low risk of flooding’.

4.50 Waterman are in the process of preparing a Flood Risk Assessment assessing the flood risk and drainage issues relating to the proposed development of land at Cliffe. However, prior to preparing this a Flood Risk and Drainage Advice Note (October 2015) has been prepared which gives preliminary advice on flooding and the drainage strategy. The Note includes the following conclusions:

6.1. Although a small part of the Site lies within Flood Zone 3, the developable area is located entirely within Flood Zone 1 and is therefore classified as having a low probability of flooding from tidal and fluvial sources. The risk of flooding from groundwater and reservoirs has also been assessed and found to be low.

6.2. The majority of the Site is shown to be at low risk of pluvial flooding. Some small areas within Plots E1, E2 and E4 are shown to be located within areas at low to medium risk of surface water flooding, however these can be easily mitigated and will not influence the Masterplan.

6.3. The western part of Plot S1 is low lying and is shown to be at low to high risk of surface water flooding. Assessment of the topography shows this area to be steeply sloping and an EA groundwater monitoring well and a telecommunication pole are also located within this area. Groundwater levels will also preclude infiltration drainage in this area. Therefore, ground raising would be required if it was necessary to develop this part of the Site.

4.51 For further details see the Flood Risk and Drainage Advice Note which accompanies this statement.

4.52 The Advice Note has informed the preparation of the preliminary masterplan, in particular the drainage strategy and the number, location and size of swales and other water attenuation areas.

Amenity / overlooking

4.53 We note that this issue is identified as amber in the RAG categorisation – ‘the site has the potential to impact upon amenity of nearby residential properties. Whilst this is likely to be resolvable through sensitive design, it is likely this would have implications for site capacity’.

4.54 Virtually every site has the potential to impact on the amenity of nearby residential properties and will need to be designed to ensure that the relationship between properties is acceptable in terms of amenity and overlooking. This is really a detailed issue for careful design and consideration at the development management stage.

4.55 However, the preliminary masterplan has been designed to ensure a satisfactory relationship to nearby residential properties.

Employment land

4.56 This issue is not relevant to the site.

Overall

4.57 We note that the proforma suggests that overall the site suitability for housing is identified as red in the RAG categorisation – ‘the site is considered unsuitable for development unless identified constraints can be addressed’.

4.58 However, we would point out that there are no red marks against the site under the ‘Suitability – Housing’ category. As mentioned a range of technical studies has been undertaken which, amongst other matters, have looked at and hopefully addressed the identified issues, which means that the site should be considered to be suitable for development.

4.59 We would add that we note that there are a number of red marks relating to ‘Facilities & Services Accessibility’ and ‘Public Transport’. However, we note that these issues have not been applied consistently to the sites, in particular to Lodge Hill (Chattenden). The Proforma for that site states:

Facilities & Services Accessibility

Whilst the site currently has poor access to services and facilities, given that the site has an estimated capacity in excess of 500 units, development has the potential to deliver an enhancement in the level of services and facilities locally, either through direct on-site provision or through contributions towards local off-site facilities...

Public Transport

Whilst the site currently has poor access to public transport opportunities, given that the site has an estimated capacity in excess of 500 units, development has the potential to deliver an enhancement to public transport opportunities locally.

4.60 Whilst we would question whether the land at Cliffe has poor access to services and facilities or public transport opportunities, the proposals are also for more than 500 dwellings, as at Lodge Hill, and so the comments

about the potential to deliver an enhancement in the level of services and facilities locally, either through direct on-site provision or through contributions towards local off-site facilities, and an enhancement to public transport opportunities locally, are also equally applicable to the land at Cliffe. In addition to this there is the added advantage that the proposals at Cliffe will benefit existing residents, which is not the case with Lodge Hill. The criteria should therefore be treated consistently and Cliffe should not be classified as red when Lodge Hill is amber.

- 4.61 Whilst commenting on Lodge Hill we note that that site is identified as amber under Ecological Potential and Designated Habitats, even though the criteria set out in the SLAA advises that *'sites were excluded from further assessment if they were constrained by one or more of the following restrictive designations that are present in Medway'*, which includes Chattenden Woods and Lodge Hill SSSI, which covers the site. If the issues were applied consistently, and as set out in the report, Lodge Hill would have been excluded as part of the Stage 1 Screening.
- 4.62 In the light of the above, including the reports which address the identified constraints, we would suggest that the overall conclusion on Cliffe should be that the site is considered to be suitable for development, and certainly should not be assessed as less suitable than Lodge Hill, which is subject to very significant constraints (ie SSSI designation, which may well not be able to be resolved).

SUITABILITY – ECONOMIC DEVELOPMENT

- 4.63 This is not relevant to the current proposals for a residential development, which do not propose significant economic development.

SUITABILITY – MIXED USE

- 4.64 This is not particularly relevant to the current proposals for residential development, although if desirable, it could include an element of mixed eg workshops or live work units, but would be limited to uses which would be compatible with a residential area to avoid any issues about residential amenity.

AVAILABILITY

- 4.65 We confirm that the landowner, Trenport Investments Limited, is actively promoting the site for residential development and would make the site available for development at the earliest possible opportunity. All of the site and much of the surrounding land is in the single ownership of Trenport so there are no site assembly or ransom issues. Trenport is also a development company.

[Note: Medway Council has a lease on the existing sports ground which was renewed in 2014 for a 3 year period].

OTHER MATTERS

4.66 Although this is not identified as an issue an Existing Utilities Report has been prepared by Watermans, in consultation with relevant utility companies, which is also submitted with this statement and has informed the preparation of the Preliminary Masterplan.

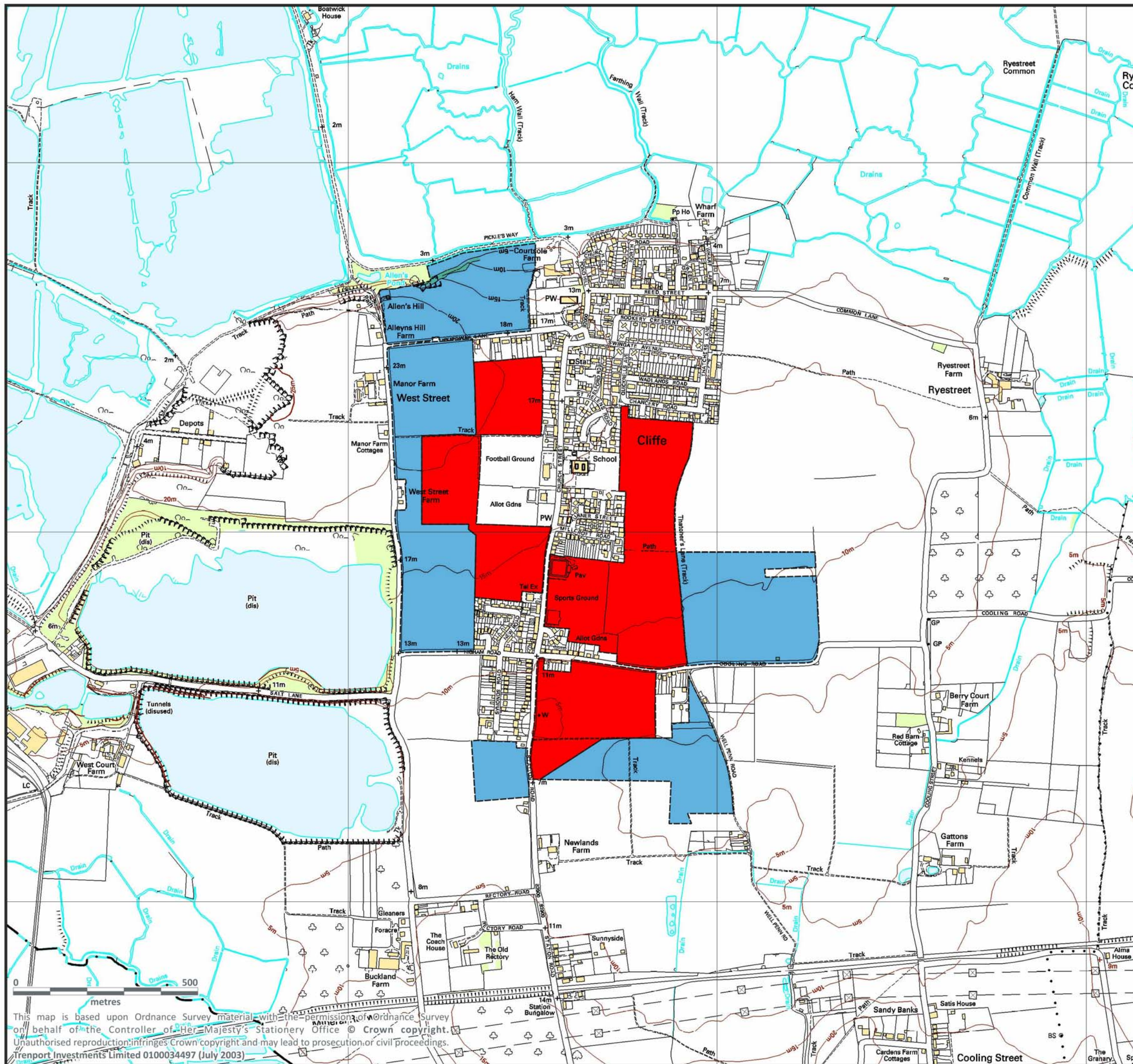
4.67 The report concludes that:


All major services are present within the area except surface water drainage which is assumed to be dealt with by means of soakaways. It would seem reasonable to assume that surface water disposal will be able to be dealt with by soakaways in the new development areas, although this will need to be confirmed by way of soakage tests and will be subject to the usual approvals.

Further consultations are being undertaken with the HSE.


5.0 CONCLUSIONS

- 5.1 The site is not subject to any planning or environmental policy designations or constraints. It is in a suitable and sustainable location for development close to existing services and facilities, which are within walking distance, with public transport services providing access to other facilities. There are no physical or infrastructure constraints which would constrain development. The land is in single ownership, available and development is achievable. Development at Cliffe would help to meet housing needs, enhance the existing village and help to maintain and enhance existing services and facilities.
- 5.2 In submitting this statement we believe that there is a significant question mark over whether Lodge Hill will be able to proceed and whether any mitigation can satisfactorily overcome the objection in principle to development inherent in the SSSI designation. At the very least the designation will further delay the delivery of housing at Lodge Hill, possibly by several more years, as it has done already, and so there is an urgent need to deliver other sites in the shorter term, which could include Trenport's land at Cliffe. The proposals for Cliffe could be progressed on an interim basis pending Lodge Hill being developed (assuming that it does proceed) or an alternative strategy for meeting Medway Council's housing needs. Assuming that Lodge Hill does not proceed, which we feel is very likely, there will be a general need to provide replacement housing, which could include the land at Cliffe.





POTENTIAL DEVELOPMENT AREA
(INCLUDING OPEN SPACE)



OTHER LAND IN TRENPORT
OWNERSHIP

REVISION D:
Amendment to land parcels and key plan!
HNA/22-02-2016

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PROJECT TITLE

Medway Local Plan

DRAWING TITLE

Cliffe - Site location plan

SCALE	DATE	CHECKED
1:10000	JANUARY 2009	
	DRAWN	DATE
	HP	

PROJECT No.		100	D
4325			

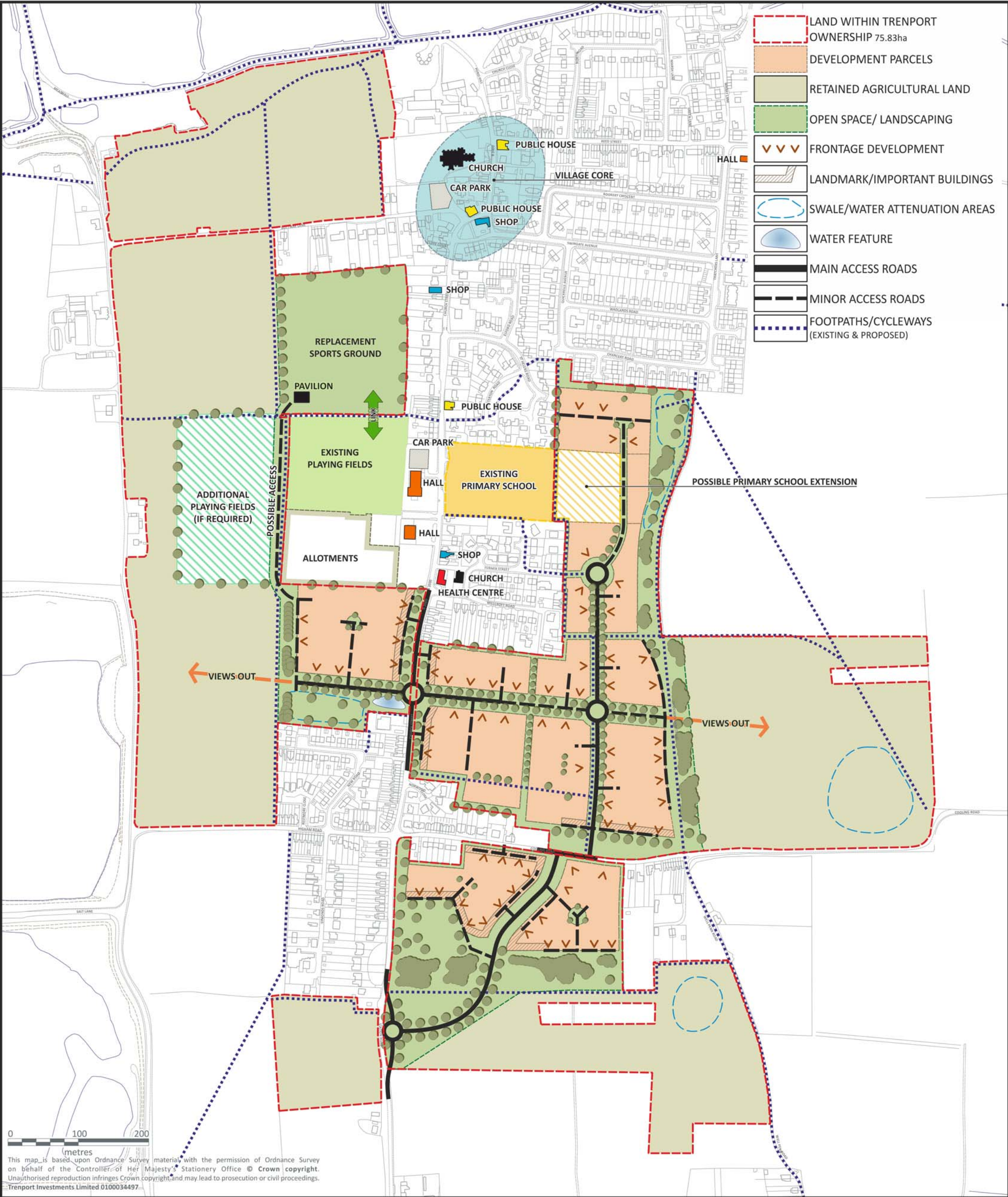
VINCENT AND GORRING

CHARTERED ARCHITECTS AND TOWN PLANNERS

STERLING COURT NORTON ROAD STEVENAGE HERTS

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REVISION A:
Amendments to masterplan following consultants comments
HNA/23-02-2016

PROJECT TITLE
Medway Local Plan

DRAWING TITLE
Preliminary masterplan

SCALE	DATE	CHECKED
1:5000	FEBRUARY 2016	
	DRAWN	DATE
	HNA	
PROJECT No.		
4325	N	110A
VINCENT AND GORBING		
CHARTERED ARCHITECTS AND TOWN PLANNERS		
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MEDWAY COUNCIL LOCAL PLAN 2012-2035

LAF NOTES ON CONSULTATION DRAFT

Vision & Strategic Objectives

2.5 Medway is an Unitary Authority not the largest City in Kent.

3.2 Developments planned for Hoo St.Werburgh, Chattenden and Deangate.

Residents had no chance to save Deangate!

Chattenden developments have begun already!

3.27 Hoo St.Werburgh will become a town!

3.28 All traffic will have to come through Strood!

3.42 Upgrading railway to include passenger traffic. Who is going to pay for this? Investment in the bus network and a new station!

3.45 Development at Hoo would save Capstone Valley and North Rainham from Development. Strood would pay the price with even more congestion on our roads.

3.49 The loss of commercial land to housing means less local jobs and more commuting elsewhere.

3.53 Homes England is proposing a new development at Lodge Hill. Ancient woodland and land to the north-east of the site would remain undeveloped.

3.56 Hoo rural town could have 2,000 homes, primary school, 29 hectares of public open space, mixed use facilities, for community uses, small shop units and commercial land!

Policy DS2 p.36 Chatham will provide the focus for new retail and community facilities? Hoo St. Werburgh will become a small town. The Council will consider developments around Rainham, Capstone, High Halstow, Lower Stoke, Allhallows, Grain and Halling.

HOUSING

4.3 The local Plan needs to provide for 29,463 new homes!

4.4 17,112 affordable homes are needed over the plan period. Hoo could provide homes for different groups in society

4.8 A mix of types of housing cannot be delivered in practice if it would be harmful to a heritage asset?

4.9 Welfare reform could increase the number of people under 35 looking to rent and may have impacts on the housing market.

Policy H3 Affordable housing provision: rural Medway 30% on 15 or more and urban Medway 25% on developments over 15 dwellings. These should be integrated within developments, but the Council may consider off site provision where other policies objectives can be met and 106 monies are provided?

4.22 Over the next 17 years the number of over 65's who need some form of care, will rise by 63%.

Policy H4: Should the Council promote the development of retirement villages, supported housing or residential homes?

Policy H6: Mobile home sites will be protected from development plans but must adhere to latest Model Standards.

EMPLOYMENT

5.5 Medway has a slightly higher proportion of micro enterprises and fewer medium and large businesses.

5.8 Hoo could provide sites for businesses to make use of rail and water based freight transport

5.10 The Council supports opportunities for modular construction factories in employment sites like Kingsnorth.

5.18 The Council recognises opportunities around Chatham, Gillingham and Strood. Development of Hoo town could provide new employment complimenting sites at Grain and Kingsnorth.

RETAIL & TOWN CENTRES

6.5 Chatham is seen as the main shopping Centre?

NATURAL ENVIRONMENT & GREEN BELT

7.9 The Council is updating the Medway Rights of Way Improvement Plan for publication in late 2018.

Policy NE5: The Council **will consider** the need to protect the special features of Regionally Important Geological Sites, Local Wildlife Sites & Local Nature Reserves. **Surely they should protect not merely consider.**

Opportunities will be sought to promote and enhance the public rights of way network, including footpaths, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside.

7.27 If exceptional circumstances existed the Council would justify a revision to the Green Belt boundary in Medway.

7.37 Where an air quality objective has not been met the planning authority must declare an Air Quality Management Area and put in an action plan to bring pollutant levels below the objective.

HEALTH & COMMUNITIES

9.5 Obesity levels in Medway are above average.

9.9 Many local people have asked that the Local Plan looks at identifying a site for a new hospital. Has this been done?

Policy HC1: The Council will seek to investigate the redevelopment of the present Medway Maritime Hospital. If deemed necessary the relocation, or partial relocation of some services to a new site within Medway will be considered.

INFRASTRUCTURE

10.4 There are infrastructure deficiencies in many areas.

10.6 The Council is producing an infrastructure delivery plan to sit alongside the Local Plan.

10.19 The Council supports early engagement with water services to plan strategically for growth as set out in the Local Plan.

10.26 Open space and sports facilities should be protected but Sport England can override if the development meets one or more of five specific exceptions. This is what happened to Deangate Ridge, as it is included in the Local Plan.

10.29 Medway has a shortfall of open spaces for sport save for parks surplus in Chatham & Rainham. Strood and the Hoo Peninsular has lots of natural greenspace?

TRANSPORT

11.3 The Coastal path will run along the land to the south of the Medway Estuary and around the Hoo Peninsular.

11.4 The LTP is supported by the Cycling Action Plan and the PROW improvement Plan.

11.12 Any new rail franchise will be required to trial Pay-as-you-Go ticketing such as Oyster-type card or contactless payment cards.

11.17 The development of Hoo will depend on upgrades to transport.

11.19 A rail connection to Grain would relieve local congestion and improve employment opportunities.

11.20 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.

11.35 The Council supports the potential for new services on the river. The introduction of a new river crossing could facilitate the use of Medway Tunnel for pedestrians and cyclists?

Policy T6: Waterfront developments will incorporate public space for walking and cycling.

11.40 There is potential for growth to facilities for visiting vessels.